

Super Star Car Wash
Class 32 CEQA Exemption Analysis
March 2024



CITY OF SANTEE
Department of Development Services

Super Star Car Wash
Class 32 CEQA Exemption Analysis

March 2024

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CLASS 32 CATEGORICAL EXEMPTION

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I. PROJECT CHARACTERISTICS

1. Project Title:

Super Star Car Wash

2. Lead Agency Name and Address:

City of Santee
Department of Development Services
10601 Magnolia Avenue
Santee, CA 92071

3. Contact Person and Phone Number:

Christina Rios
Senior Planner
(619) 258-4100 x157
10601 Magnolia Avenue
Santee, CA 92071
crios@cityofsanteeca.gov

4. Project Location:

8837 Magnolia Avenue
Assessor's Parcel Number: 384-470-33-00

5. Project Sponsor's Name and Address:

SSCW 22608 Rockville LLC
Attn: Luke Eid, Senior Project Manager of Site Development
960 W Behrend Drive, Suite 1
Phoenix, AZ 85027

6. Property Owner:

SSCW 22608 Rockville LLC
960 W Behrend Drive, Suite 1
Phoenix, AZ 85027

7. Existing General Plan Designation:

General Commercial and Light Industrial

8. Existing Zoning:

General Commercial and Light Industrial

II. EXECUTIVE SUMMARY

The project applicant, Super Star Car Wash, has submitted a Conditional Use Permit Application (P2023-2) to construct and operate a car wash at the northwest corner of Magnolia Avenue and Rockvill Street in the City of Santee. The Proposed Project would include the demolition of the existing RV automobile dealership, including its office building and on-site surface parking, for the construction, use, and maintenance of a 4,980 square-foot car wash center with 31 vacuum stations. The Proposed Project would also provide three employee parking spaces and ornamental landscaping along the periphery of the Project Site, which would include trees, shrubs, and grass.

The analysis provided herein evaluates the Proposed Project with respect to the qualifying criteria to be deemed categorically exempt from CEQA review as a Class 32 Infill Development Project as set forth in CEQA Guidelines Section 15332. Based on the information and conclusions set forth on the following pages, this CEQA analysis provided substantial evidence to support the determination that the Proposed Project meets the criteria of a Class 32 Infill Development Project and that none of the exceptions to categorical exemptions exist or are applicable to the Proposed Project. As such the Proposed Project is categorically exempt from CEQA review and no additional environmental documentation or analysis is required.

III. PROJECT DESCRIPTION

Project Site Location

The Project Site is located in the City of Santee (City). The Project Site's location within the City and the greater San Diego region is depicted in Figure 3.1, Project Location Map. The Project Site encompasses 1 parcel and includes approximately 54,450 square feet (approx. 1.26 acres). The Project Site is generally bound by general commercial to the north and east, Rockvill Street to the south, and Magnolia Avenue to the west. The Project Site's property address, Assessor's Parcel Number (APN), land use, and lot area are summarized in Table 3.1, Summary of Project Site, below.

**Table 3.1
Summary of Project Site**

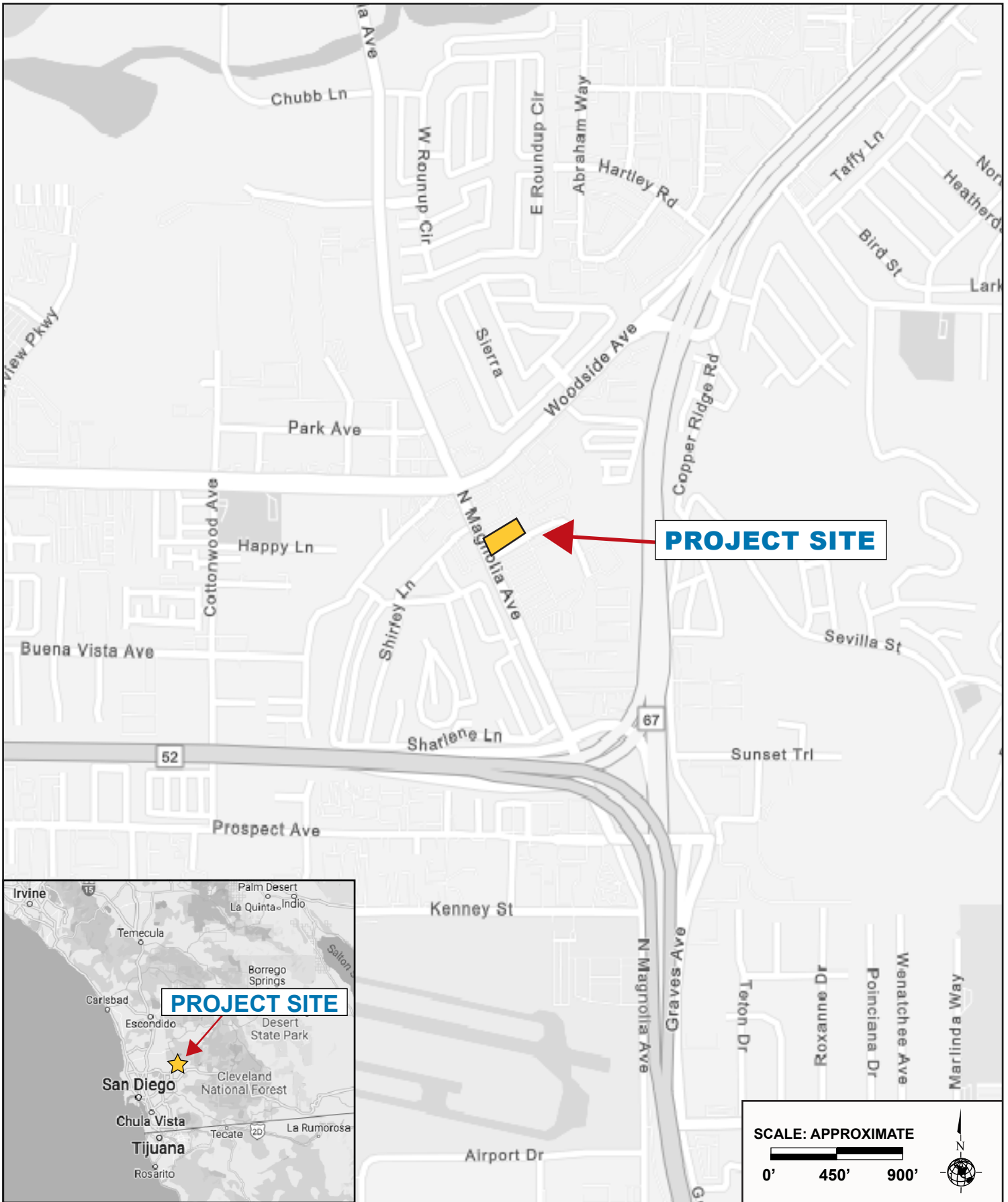
| Address | APN | Existing Land Use | Lot Area (square feet) |
|--|---------------|--------------------------|-----------------------------------|
| 8837 Magnolia Avenue | 384-470-33-00 | Automobile Dealership | 54,450 sf |
| <i>Source: San Diego Geographic Information Source, SanGIS, Interactive Map, https://sdgis.sandag.org/, accessed January 2023.</i> | | | |

Local access is provided by the roadway system surrounding the Project Site. The City's Mobility Plan classifies street designations in the Project vicinity.¹ Magnolia Avenue is a northbound-southbound street and borders the Project Site to the west. It is a two-way street providing two travel lanes in each direction and is classified as a Prime Arterial in the City's Mobility Plan. Rockvill Street travels both east-west and north-south and terminates in a cul-de-sac. Rockvill Street provides one travel lane in each direction and some street parking and is classified as a Collector Industrial street in the City's Mobility Plan. Regional access is provided by State Route (SR) 67, located approximately 950 feet to the east, and SR 52, located 0.28-mile to the south.

The Project Site is served by the San Diego Metropolitan Transit System (MTS) bus route 832 (Santee Town Center) and 833 (Santee Trolley), with the nearest bus stop at Magnolia Avenue and Rockvill Street, located approximately 125 feet southwest of the Project Site.²

¹ *City of Santee, General Plan Mobility Element, adopted October 25, 2017, <https://www.cityofsanteeca.gov/home/showpublisheddocument/11054/636446327420070000>, accessed January 2023.*

² *San Diego Metropolitan Transit System, Bus Route Schedules, Interactive Map, <https://www.sdmts.com/getting-around/departures-and-schedules/schedules/832>, accessed January 2023.*



Source: ArcGIS, 2021.

Figure 3.1
Project Location Map

Existing Conditions and Surrounding Land Uses

Existing Site Conditions

The Project Site is currently developed with a Recreational Vehicle (RV) rental facility and sales dealership, including an approximately 2,100 square foot office building and associated on-site parking. Access to the Project Site is provided via two vehicular driveways along Rockvill Street. Vegetation on the site is limited to ornamental landscaping consisting of a row of pine trees planted along the northern and eastern property lines.

Surrounding Land Uses

Properties surrounding the Project Site include a mix of religious and general commercial land uses that range in height from one- to two-stories above grade. Figure 3.2, Aerial Photograph of the Project Site and Surrounding Land Uses, shows an aerial view of the Project Site and identifies the photograph locations for the Project Site and surrounding land use photographs shown in Figure 3.3, Photographs of the Project Site, Views 1-6, and Figure 3.4, Photographs of the Surrounding Land Uses, Views 7-12. Below is a description of the existing conditions in the surrounding area.

North: The Project Site is immediately bordered by a surface parking lot associated with the commercial uses further north of the Project Site, which include a church, two auto repair shops, a pest management business, and a glass shop.

East: The Project Site is immediately bordered by a large one-story commercial strip mall with associated surface parking to the east.

South: Rockvill Street borders the Project Site to the immediate south. Further south, across Rockvill Street, there is a Park & Ride surface parking lot and a church.

West: Magnolia Avenue borders the Project Site to the immediate west. Further west, across Magnolia Avenue, there are commercial retail and restaurant land uses and associated surface parking areas.



Figure 3.2
Aerial Photograph of the Project Site and Surrounding Land Uses



View 1: From the west side of Magnolia Avenue, looking northeast at the Project Site.



View 2: From the west side of Magnolia Avenue, looking east at the Project Site.



View 3: From the south side of Rockvill Street, looking southwest at the Project Site.



View 4: From the south side of Rockvill Street, looking north at the Project Site.



View 5: From the east side of Magnolia Avenue, looking southeast at the Project Site.



View 6: From the north side of the adjacent surface parking lot, looking south at the Project Site.

Source: Parker Environmental Consultants, January 18, 2023.



View 7: From the west side of Magnolia Avenue, looking northeast at the commercial and institutional properties north of the Project Site.



View 8: From the south side of Woodside Avenue, looking southeast at the commercial properties north of the Project Site.



View 9: From the south side of Rockvill Street, looking northeast at the commercial property east of the Project Site.



View 10: From the west side of Magnolia Avenue, looking southeast at the commercial properties south of the Project Site.



View 11: From the east side of Magnolia Avenue, looking northwest at the commercial properties west of the Project Site.



View 12: From the east side of Magnolia Avenue, looking south at the residential properties southwest of the Project Site.

Source: Parker Environmental Consultants, January 18, 2023.

Figure 3.4
Photographs of the Surrounding Land Uses

General Plan and Zoning

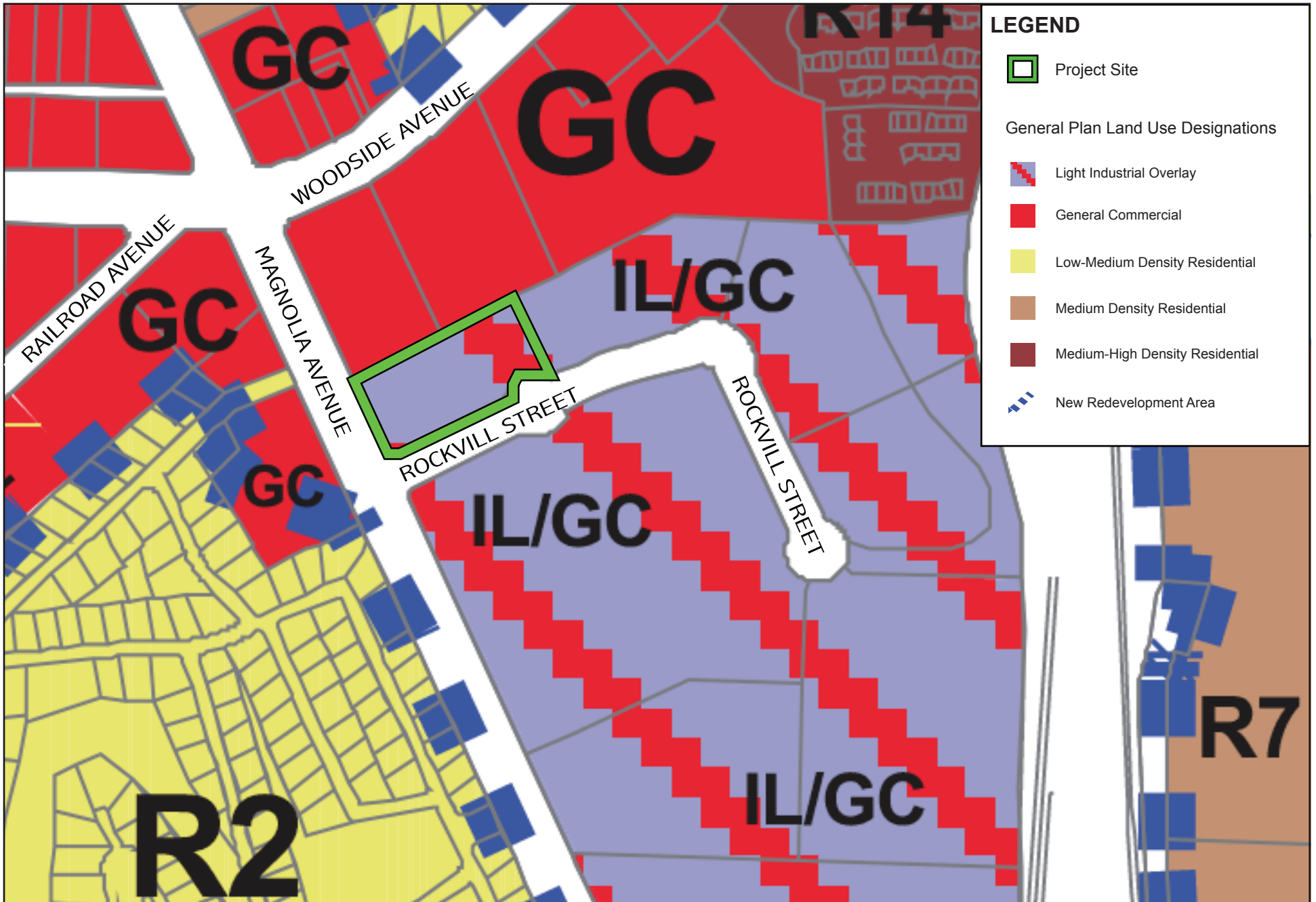
Zoning and Land Use Designations

Figure 3.5, Zoning and General Plan Land Use Designations, shows the existing and proposed zoning and land use designations of the Project Site and surrounding area. The zoning for the Project Site is IL/GC, with a General Plan Land Use Designation of Light Industrial Overlay.³ As shown in Table 3 Land Use Plan – Statistical Summary of the City’s Land Use Element, land designated as part of the Light Industrial Overlay encompasses a total of 10 acres within the City, which comprises approximately 0.2 percent of the City’s total land mass.

The Light Industrial Overlay designation is intended to allow opportunities for development of Light Industrial uses in combination with general commercial uses and activities.⁴ Such uses shall be located in transitional areas that provide a compatible mix of both general commercial and light industrial uses. Development proposed under this designation is required to undergo Site Plan Review, as required by the City of Santee Municipal Code (SMC).

³ *City of Santee, Planning and Zoning Services, Zoning District Map,*
<https://www.cityofsanteeca.gov/home/showpublisheddocument/8549/637952158010870000>,
accessed January 2023.

⁴ *City of Santee, General Plan Land Use Element,*
<https://www.cityofsanteeca.gov/home/showpublisheddocument/7191/638066251819800000>,
accessed January 2023.



Source: City of Santee, General Plan Land Use Element, 2020.

Figure 3.5
Zoning and General Plan Land Use Map

Proposed Project

The Proposed Project includes the demolition of the existing RV rental facility and dealership, including its office building and on-site surface parking, and the construction, use, and maintenance of a 4,980 square-foot car wash center with 31 vacuum stations, three on-site queuing lanes for cars to enter the car wash. Three employee parking spaces would be provided, along with three bicycle parking spaces. The Proposed Project would also provide ornamental landscaping along the periphery of the Project Site and along the vacuum stations, which would include, trees, shrubs, and grass. Table 3.2 summarizes the characteristics of the Proposed Project.

**Table 3.2
Proposed Development Program**

| Land Uses | Dimensions (Square Feet) | Floor Area (Square Feet) |
|---|-----------------------------|-----------------------------|
| Commercial | | |
| Car Wash | 4,980 | 4,980 |
| Total Floor Area: | | 4,980 |
| Total Lot Area: | | 54,450 |
| Floor Area Ratio (FAR): | | 0.091:1 |
| <i>Source: Architects Orange, September 11, 2023.</i> | | |

Floor Area

The Proposed Project includes a total lot area of 54,450 square feet, of which 4,980 square feet would be the proposed buildable floor area for the car wash building. As such, the Proposed Project would include a 0.091:1 Floor Area Ratio (FAR).

Proposed Project Operations

The Proposed Project (Super Star Car Wash) facility will utilize an Express Exterior Model to process a high volume of cars washed without any backup at the entrance through the use of the following tools and processes:

Express Pay Terminal (XPT) and Queueing Lanes:

There will be three XPT lanes available, with each terminal capable of processing up to 80 cars per hour. Customers will enter the XPT lanes to select the level of wash service desired and complete the payment transaction. There will be attendants to assist the customer through this process.

The Proposed Project is expected to process 50 vehicles per hour at weekday peak hour and 75 vehicles per hour at Saturday peak hour. Due to the capacity and speed at which the equipment can process cars, as stated below, there are no anticipated issues with the driveway/entrance into the XPT lanes being blocked or backed up to

the street or common drive at any time. There will always be one or two attendants positioned at the XPTs to ensure the smooth and quick process of getting the cars into the wash tunnel. The attendants also help those customers that do not understand how to operate the XPT and those who need help with processing their payment with cash or credit card.

Additionally, Super Star Car Wash sells Unlimited Car Wash Monthly plans. At other existing Super Star Car Wash locations nearly 60% of customers purchase and use these plans. When these plan members come in to receive their car wash, the payment process is sped up dramatically as all they have to do is pull into a lane, the LPR automatically reads their License Plate and the XPT terminal issues their wash and opens the gate with the customer never having to open their window to pay, which significantly increases the speed of vehicles through the queuing process.

Once the lane gate opens and allows the customer to move forward to enter the wash tunnel, there are vehicle sensors built into the concrete that monitor the order of the cars as they leave the XPT terminals and merge into the car wash tunnel. This keeps cars entering the wash tunnel in the order of which they have paid making for a smooth and seamless transition into the wash tunnel. This queuing process helps eliminate traffic pileups and keeps everyone moving quickly.

Finally, because of the speed and efficiency of the XPT and LPR process, there are no anticipated issues with queuing lanes blocking and/or backing up to the street or common drive at any time. However, in the extremely rare occasion that the car wash volume reaches maximum capacity or has a mechanical issue and vehicle stacking becomes a problem, one of the attendants will post a moveable sign in front of the carwash queuing entrance that says, "Wash Full". They will send those customers into the free vacuum bays to perform their vacuuming or ask them to come back later. The sign is only removed once the stack of cars dissipates, or mechanical issue is resolved.

Automated Wash Tunnel

The automated wash tunnel is capable of processing up to 180 vehicles per hour while still delivering the desired optimal washing quality. The conveyor speed can be increased to process more vehicles per hour, however it is not anticipated to ever have to increase the speed of the car wash conveyor beyond 180 vehicles per hour based on the volume of vehicles projected. There is an attendant at the tunnel entrance to guide the customer onto the conveyor and to give proper instructions to the customer for a safe and easy loading of the vehicle onto wash tunnel conveyor with the customer still inside the car. The automated tunnel conveyor will take the vehicles through the tunnel completing the wash chosen by the customer at the XPT. Vehicles are automatically discharged at the end of the tunnel where a green light will notify them to put their vehicle in drive and proceed to the exit(s) or free vacuum bays.

Vacuum area

After exiting the wash tunnel the customer has the option to park at the vacuum stations to vacuum their car and wipe any remaining water drops still on the car's surface with soft, clean microfiber towels that are provided by Super Star Car Wash at no cost to the customer. There will be attendants in this area to guide the customer in and out of the vacuum stations safely. In the car wash Industry's Express model, approximately 25% of customers that go through the wash tunnel will stop and vacuum their cars.

Emergency Provisions

The Super Star Car Wash would include several fail-safe emergency shut offs within the Automated Wash Tunnel. There would be two manual emergency shut offs and four automated emergency shut offs.

Wastewater Recycling

The Super Star Car Wash would use the highest grade and best water recycling equipment for its water discharge. All carwash sewer discharge water would be routed into separator tanks where 80% of the water is recycled into the operation for re-use.

Restrooms / Vending Machines

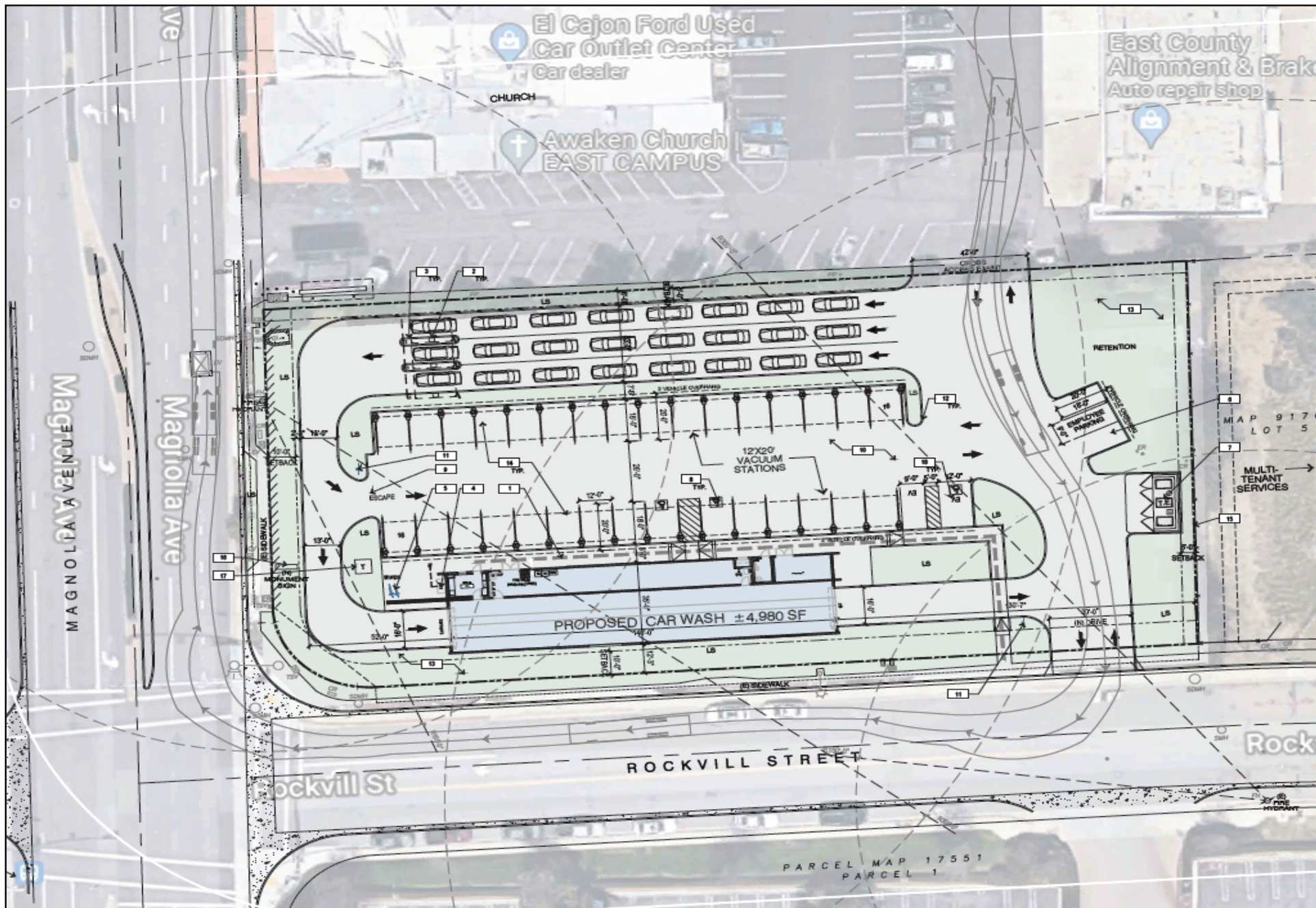
A restroom would be provided on-site for customer use. There would be no vending machines provided on-site for customer use.

Operation Hours and Staffing

This facility will operate from 7 A.M. to 8 P.M. seven days a week. During slow to moderate business traffic there will be a minimum of 3 employees on staff and at the busiest times there will be 5 employees on staff, one of which is a Store Manager. Deliveries are made at 5 A.M. as needed each week by means of a Super Star pickup truck from the local DC. Super Star has a full service monitored security system. Landscaping maintenance is performed every 2 weeks by a Landscape Contractor. Daily trash and debris cleanup around the site is performed by staff and trash service comes 3 days a week to empty the dumpster(s).

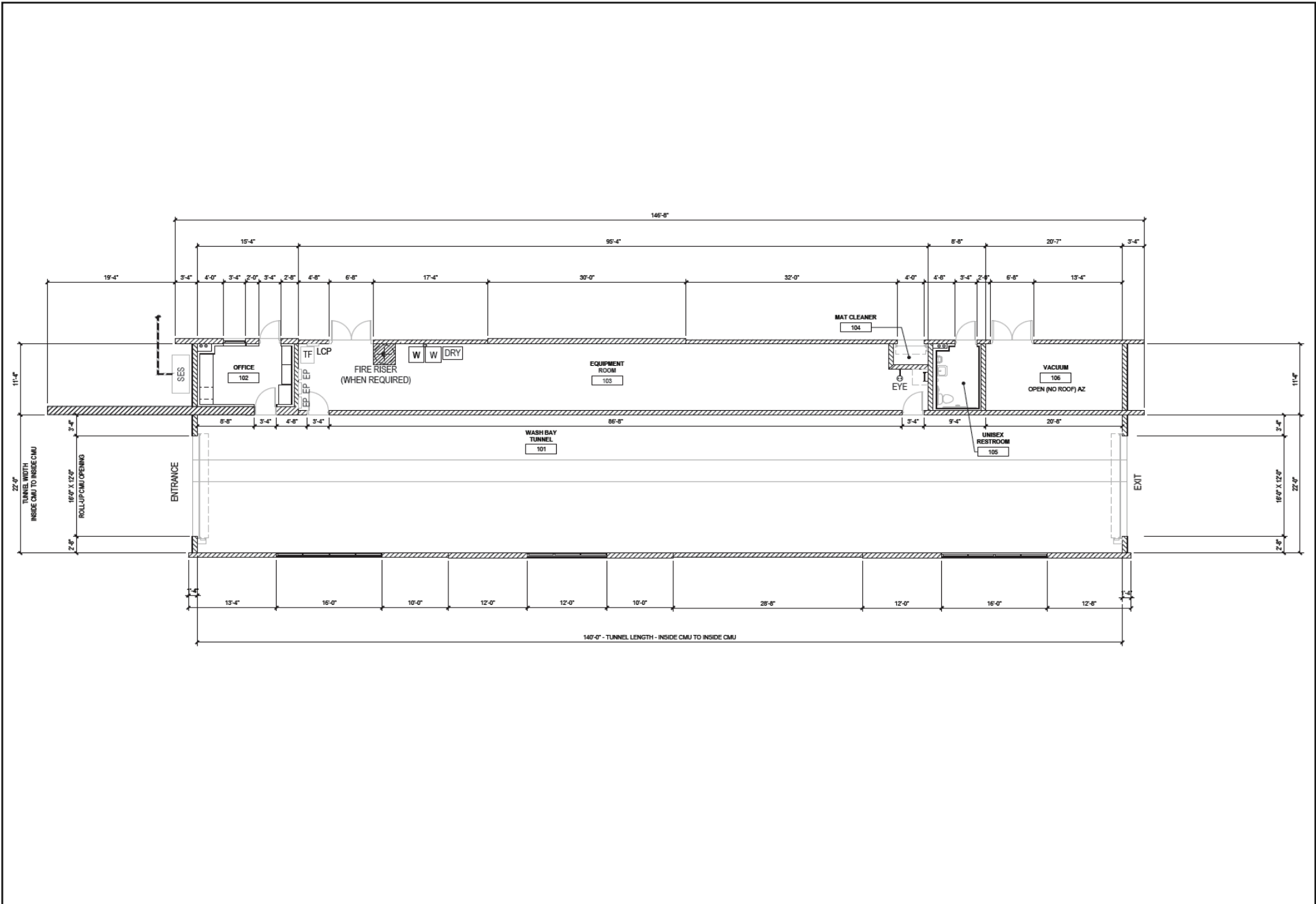
Santee Municipal Code

The Project Site has a Zoning and General Plan designation as IL/GC. SMC 13.04.020 states that when a property is developed in accordance with dual zones the least restrictive development, performance and maintenance standards shall apply. Therefore, the General Commercial standards were utilized.



Source: Architects Orange, September 11, 2023.

Figure 3.6
Site Plan



Source: Architects Orange, September 11, 2023.

Figure 3.7
Floor Plan



North Elevation



South Elevation

Source: Architects Orange, September 11, 2023.

Figure 3.8
North and South Elevations

Building Height

For General Commercial development, the SMC provides a height restriction of 40 feet, with proposals for development exceeding this height requiring approval of a conditional use permit. As shown in Figure 3.8, North and South Elevations and Figure 3.9, East and West Elevations, the Proposed Project car wash would be 28 feet above grade at the top of the parapet. As such, the Proposed Project is consistent with the applicable height restriction.

Setbacks

As shown in Table 13.12.040B Setbacks, in the SMC, for all streets there are requirements for a 10-foot building setback, a 10-foot parking setback, and an entire front setback for landscaping. Along the rear property line, for proposed development adjacent to a commercial or industrial zone, there are requirements for a 5-foot building setback, no required setback for parking, and no required setback for landscaping. For the interior side property line, for proposed development adjacent to a commercial or industrial zone, there are requirements for a 5-foot building setback, a 5-foot parking setback, and a 5-foot landscaping setback.

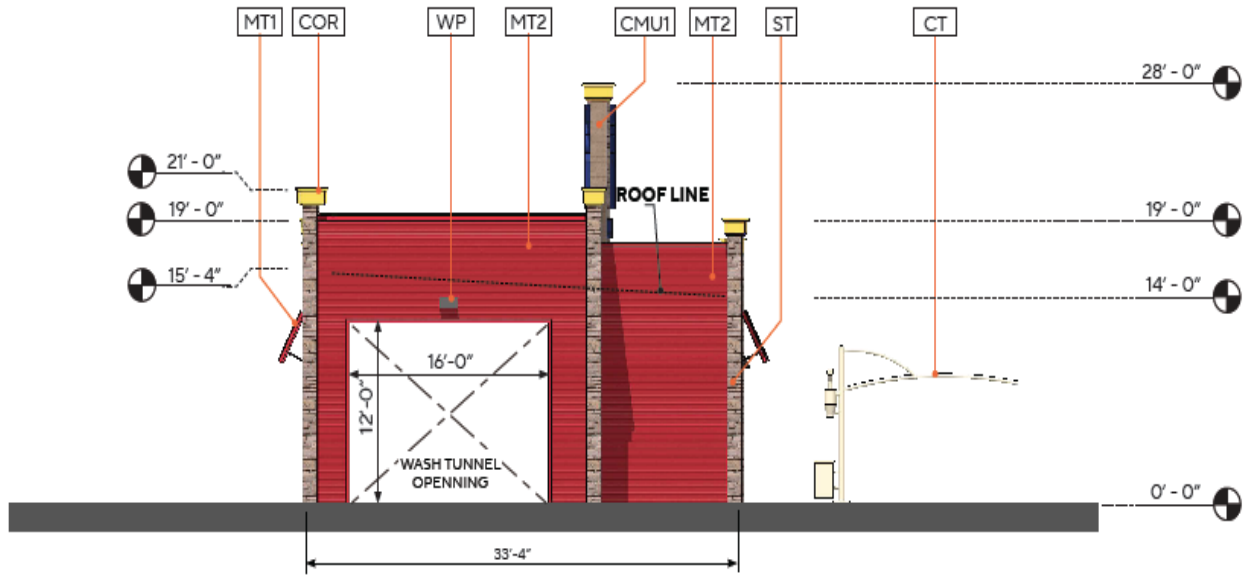
As shown in Figure 3.6, Site Plan, the Proposed Project would exceed the minimum 10-foot setback along Magnolia Avenue and Rockvill Street, along the western and southern property lines respectively, in addition would exceed the minimum 5-foot setback along the northern property line and a 5-foot setback along the eastern property line. As such, the Proposed Project would be consistent with the applicable setback requirements.

Design and Architecture

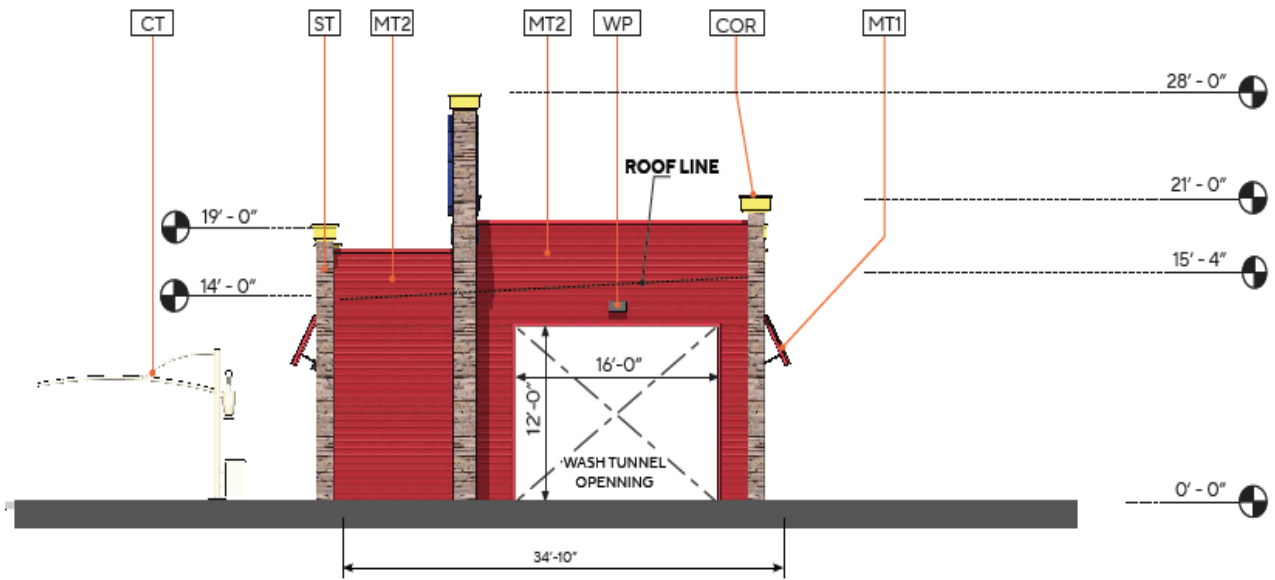
The Proposed Project one-story car wash would be designed with modern architectural materials, such as masonry, metal canopy and metal panes, concrete trim, stucco, and stone veneer.

Open Space and Landscaping

The Proposed Project would provide additional ornamental landscaping along the periphery of the Project Site and along the vacuum stations, which would include trees, shrubs, and grass. The Proposed Project would comply with the Landscape Development Standards outlined in Section 13.36.100 of the SMC, specifically regarding Parking Landscape Standards and General Landscape Standards. California native or drought-tolerant plants shall be used to the maximum extent feasible to minimize the need for irrigation. Where irrigation is necessary, the system shall be designed and installed to prevent overspray or irrigation runoff during normal operations and during a break in the line, in accordance with City policy. See Figure



East Elevation



West Elevation

Source: Architects Orange, September 11, 2023.

Figure 3.9
East and West Elevations



View 1: Near the southeastern corner of the Project Site, looking northwest at the car facility and tunnel exit.



View 2: Along the western border of the Project Site, looking southeast at the car wash tunnel entrance and southern aisle of vacuum stations.



View 3: Inside the Project Site, near the eastern border, looking southwest at the northern aisle of vacuum stations.

Source: Architects Orange, September 11, 2023.

Figure 3.10
Architectural Renderings and Perspectives

Access, Circulation, and Parking

As shown in Figure 3.6, Site Plan, access to the Project Site would be provided via one full-access driveway along Rockvill Street and one full-access driveway located along the northern property line abutting a surface parking lot area for the commercial development north of the Project Site, for which approval of a cross-access easement would be applied. Chapter 13.24, Parking Regulations, in the SMC provides parking stall standards for proposed development. Under Section 13.24.030 Design Standards, the Project Site is required to comply with the general parking provisions governing stall size, handicapped spaces, paving, drainage, safety features, lighting, noise, screening, striping, maneuvering, design standards specific to commercial, industrial, institutional, and community facilities, and parking lot striping and marking standards. The Project Site is also required to comply with Section 13.24.040 Parking Requirements for nonresidential land uses and bicycle parking spaces. Additionally, Ordinance 611, which was established in May 2023 and amends Title 13 of the SMC, establishes that parking requirements for a self-service car wash is determined by a parking study approved by the Director. A Parking Demand Analysis was prepared for the Proposed Project Y2K Engineering, LLC (see Attachment 9 of this Categorical Exemption). Based on the Parking Demand Analysis, the car wash land use is stated to obtain a maximum average of 9 occupied parking spaces per wash stall at the peak time. Therefore, it is expected that the proposed 31 vacuum parking stalls will be adequate due to an anticipated average of 9 vehicles utilizing the stalls during the weekday or Saturday peak hour.

Additionally, based on data from existing Super Star Car Wash facilities a maximum of 40% of the traffic visiting their locations utilizes the parking spaces to vacuum or wipe down their vehicle. Based on this information and the 75 typical weekend visitors during the peak hour, the maximum parking demand expected at the Proposed Project is between 8 and 15 vehicles. Therefore, it is expected that the proposed 31 parking spaces will adequately serve the Project Site.

The Proposed Project would also comply with the bicycle parking requirements as shown in Table 3.4, Summary of Required and Proposed Bicycle Parking Spaces. The Proposed Project would provide three employee parking spaces and three bicycle parking spaces.

**Table 3.4
Summary of Required and Proposed Bicycle Parking Spaces**

| Description | Rate | Total Spaces Required |
|---|--|-----------------------|
| Short-Term | | |
| Super Star Car Wash | 5% of parking capacity, minimum two ^a | 2 |
| Total Required Bicycle Parking Spaces: | | 2 |
| Total Proposed Bicycle Parking Spaces: | | 3 |
| ^a Per Chapter 13.24 Parking Regulations, Section 13.24.040 C.2.a. states that if the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitors' entrance, for five percent of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack. Source: Architects Orange, September 11, 2023. | | |

Lighting and Signage

Exterior lighting features within the Project Site would consist of low-level illuminated pedestrian walkways, illuminating the vacuum stations, and lighting within the car wash. One monument sign would be placed on the corner of Magnolia Avenue and Rockvill Street, in accordance with Table 13.32.050A of Section 13.32.050, Sign Regulations, of the SMC.

Site Security

The Project Site would be bordered by security fencing, which would be subject to and compliant with the recommendations of the Crime Prevention Through Environmental Design (CPTED) program that the Sheriff's Department's utilizes.⁵ This program emphasizes the application of preventative measures in new construction as well as existing buildings or locations. CPTED provides recommendations on the location and design of common areas and walking paths, lighting, fencing, and landscaping, among others.

Project Construction

For the purposes of analyzing impacts associated with air quality, this analysis assumes a Proposed Project construction schedule of approximately 6 months, with final buildout occurring in 2024. Construction activities would include four main steps: (1) demolition/site clearing; (2) building construction; (3) architectural coatings/finishings; and (4) paving. All construction activities would be performed in accordance with all applicable City, state, and federal laws with respect to building construction and activities. Construction activities occurring as part of the Proposed Project shall be subject to the limitations and requirements of SMC Chapter 5.04, which

⁵ City of Santee, General Plan Safety Element, <https://www.cityofsanteeca.gov/home/showpublisheddocument/7205/636336570205470000>, accessed January 2023.

states that construction activities may occur between 7:00 a.m. and 7:00 p.m. Mondays through Saturdays. No construction activities shall be permitted outside of these hours or on Sundays and federal holidays. No construction activity will be permitted outside of these hours except in emergencies.

Demolition/Site Clearing

This phase would include the demolition of the existing RV automobile dealership, including its office building and on-site surface parking. In addition, this phase may include the removal of walls, fences, and associated debris. The demolition/site clearing phase would be completed in approximately one month.

Building Construction

The building construction phase consists of the construction of the proposed car wash and vacuum stations, connection of utilities to the building, building foundations, laying irrigation for landscaping, and landscaping the Project Site. The building construction phase would be completed in approximately three months.

Architectural Coatings/Finishings

This phase is expected to occur over approximately one month and includes the installation of interior cabinets and lighting fixtures, interior and exterior wall finishings and paint, and the installation of windows and doors.

Paving

The paving phase would entail paving the Project Site to make it automobile accessible and also involves the laying of concrete or asphalt along adjacent roads, and setbacks. This phase is expected to occur for approximately one month.

IV. CLASS 32 CATEGORICAL EXEMPTION ANALYSIS

Every discretionary action requires environmental review pursuant to CEQA. However, the CEQA Guidelines (Sections 15300 to 15332) include a list of classes of projects, which have been determined not to have a significant effect on the environment, known as Categorical Exemptions. If a project falls within one of these classes, it is exempt from the provisions of CEQA and no further environmental review is required. The Class 32 “Infill Development” Categorical Exemption (CEQA Guidelines Section 15332), hereafter referred to as the Class 32 Exemption, exempts infill development within urbanized areas if it meets certain criteria. Projects within this class must be consistent with the local General Plan and Zoning designations and cannot result in any significant traffic, noise, air quality, or water quality impacts. This exemption may apply to residential, commercial, industrial, and/or mixed-use projects. As supported by the information presented herein, the Proposed Project falls under the Class 32 Exemption.

Class 32 Categorical Exemption: Class 32 consists of projects characterized as in-fill development meeting the conditions described below:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

As presented herein, the Proposed Project qualifies for a Class 32 Infill Development Project under the CEQA (P.R.C. 21000-21189.2), and the State CEQA Guidelines (C.C.R. Title 14, Division 6, Chapter 3, 15000-15387). The Proposed Project meets all of the criteria necessary to qualify for a CEQA Exemption as a Class 32 (Infill Development Project) pursuant to CEQA Guideline Section 15332, respectively, and none of the exceptions section set forth in CEQA Guidelines Section 15300.2 apply. Therefore, no further environmental analysis is warranted.

Criterion Section 15332(a): General Plan and Zoning Consistency

Yes No



The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations adopted for the purpose of avoiding mitigating an environmental effect. Plan inconsistencies in and of themselves are not a significant impact on the environment under CEQA. CEQA recognizes only direct physical changes or reasonably foreseeable indirect physical changes in the environment.⁶ As such, the analysis below only addresses those policies that have the potential to result in physical impacts to the environment.

General Plan

The General Plan Land Use Designation for the site is Light Industrial Overlay. In accordance with the Land Use Element of the General Plan, the Light Industrial Overlay designation is intended to allow opportunities for development of light industrial uses in combination with general commercial uses and activities. Such uses shall be located in transitional areas that provide a compatible mix of general commercial and light industrial uses. Development proposed under the Light Industrial Overlay is required to undergo site plan review, as required by the SMC.

Zoning

Santee Municipal Code

SMC 13.04.020 states that when a property is developed in accordance with dual zones the least restrictive development, performance and maintenance standards shall apply. Therefore, the General Commercial standards were applied to this project.

Land Use

As stated in the City's Land Use Element, General Commercial (GC) provides for commercial areas with a wide range of retail and service activities. Intended uses include community shopping centers, department stores, restaurants, financial institutions, automotive uses, and other specialized services. General Commercial encourages the groupings of commercial outlets into consolidated centers. Appropriate areas to be established with General Commercial activities should have direct access to major roads, prime arterials, or freeways. As stated in the City's Land Use Element, Light Industrial (IL) land uses include areas where activities such as fabricating,

⁶ See CEQA Statute and Guidelines, Section 15064(d)-(e).

assembly, research and development, electronics, low intensity warehousing, and other such similar industrial uses are appropriate. Light Industrial is appropriate as a buffer between the general industrial areas and non-industrial uses where the site is visible from residential areas or major transportation routes.

Regarding the Project Site's zoning, as stated previously, the IL/GC Zone is intended to encourage a combination of light industrial land uses with general commercial land uses and activities. Light Industrial Overlay uses are planned for development in transitional areas that provide a compatible mix of both Light Industrial uses and General Commercial uses. The Proposed Project is consistent with the intent of the IL/GC Zone, as it is an automotive use that would provide a specialized service to the community, would be located along a major transportation route of Magnolia Boulevard, which is designated as a Prime Arterial in the City's Mobility Element, and would be compatible with the surrounding general commercial uses in the Project Site vicinity. In addition, Table 13.12.030A Use Regulations for Commercial/Office Districts, in the SMC, shows land uses that are permitted, conditionally allowed, and not permitted. As shown in Table 13.12.030A, the Proposed Project's car wash would be a permitted use and thus consistent with the SMC governing land use regulations.

Floor Area

No floor area restrictions are currently present in the SMC regarding either General Commercial or Light Industrial land uses. The Proposed Project includes a total lot area of 54,450 square feet, of which 4,980 square feet would be the proposed buildable floor area for the car wash building. As such, the Proposed Project would include a 0.091:1 Floor Area Ratio (FAR).

Building Height

For General Commercial development, the SMC provides a height restriction of 40 feet, with proposals for development exceeding this height requiring approval of a conditional use permit. As shown in Figures 3.8 and 3.9, the Proposed Project car wash would be 28 feet above grade at the top of the parapet. Therefore, the Proposed Project would not exceed 40 feet and be consistent with the underlying zoning height restrictions on the Project Site.

Setbacks

As shown in Table 13.12.040B Setbacks for General Commercial, in the SMC, for all streets there are requirements for a 10-foot building setback, a 10-foot parking setback, and an entire front setback for landscaping. Along the rear property line, for proposed development adjacent to a commercial or industrial zone, there are requirements for a 5-foot building setback, no required setback for parking, and no required setback for landscaping. For the interior side property line, for proposed development adjacent to a commercial or industrial zone, there are requirements for a 5-foot building setback, a 5-

foot parking setback, and a 5-foot landscaping setback.

As shown in Figure 3.6, Site Plan, the Proposed Project would exceed the minimum 10-foot setback along Magnolia Avenue and Rockvill Street, along the western and southern property lines, respectively, and would exceed the minimum 5-foot setback along the northern property line and a 5-foot setback along the eastern property line. Therefore, the Proposed Project would be consistent with the underlying zoning setback requirements of the SMC.

Open Space and Landscaping

The Proposed Project would also provide ornamental landscaping along the periphery of the Project Site and along the vacuum station aisles, which would include trees, shrubs, and grass. The Proposed Project would comply with the Landscape Development Standards outlined in Section 13.36.100 of the SMC, specifically regarding Parking Landscape Standards and General Landscape Standards.⁷ As such, the Proposed Project would be consistent with the underlying zoning on open space and landscaping requirements of the SMC.

Vehicle Parking and Bicycle Parking

As shown in Figure 3.6, Site Plan, access to the Project Site would be provided via one full-access driveway along Rockvill Street and one full-access driveway located along the northern property line abutting a surface parking lot area for commercial development north of the Project Site, for which approval of a cross-access easement would be applied.

Chapter 13.24, Parking Regulations, in the SMC, provides parking stall standards for proposed development. Under Section 13.24.030 Design Standards, the Project Site is required to comply with the general parking provisions governing stall size, handicapped spaces, paving, drainage, safety features, lighting, noise, screening, striping, maneuvering, design standards specific to commercial, industrial, institutional, and community facilities, and parking lot striping and marking standards. The Project Site is also required to comply with Section 13.24.040 Parking Requirements for General Commercial land uses and bicycle parking spaces. As such, the Proposed Project would provide 34 vehicle parking spaces. Ordinance 611, which was established in May 2023 and amends Title 13 of the SMC, establishes that parking requirements for a self-service car wash is determined by a parking study approved by the Director. A Parking Demand Analysis was prepared for the Proposed Project Y2K Engineering, LLC (see Attachment 9 of this Categorical Exemption). Based on the Parking Demand Analysis, the car wash land use is stated to obtain a maximum average of 9 occupied parking spaces per wash stall at the peak time. Therefore, it is

⁷ See Figure 3.10, Architectural Renderings and Perspectives, to this Categorical Exemption.

expected that the proposed 31 vacuum parking stalls will be adequate due to an anticipated average of 9 vehicles utilizing the stalls during the weekday or Saturday peak hour.

Additionally, based on data from existing Super Star Car Wash facilities a maximum of 40% of the traffic visiting their locations utilizes the parking spaces to vacuum or wipe down their vehicle. Based on this information and the 75 typical weekend visitors during the peak hour, the maximum parking demand expected at the Proposed Project is between 8 and 15 vehicles. Therefore, it is expected that the proposed 31 parking spaces will adequately serve the Project Site.

The Proposed Project would continue to provide employee parking at the rate established in SMC 13.24.040 which requires three parking spaces. For short-term bicycle parking, the Proposed Project would provide three bicycle parking spaces, exceeding the SMC short-term bicycle parking requirements. No long-term bicycle parking is required, as the Proposed Project does not include over ten tenant-occupants.

Land Use Element

The Land Use Element of the Santee General Plan provides goals and objectives to establish an official guide to the future development of the City of Santee. The purpose of the Land Use Element is to establish a framework to direct physical development of the City and form the organization of the City’s environment. It serves as the primary vehicle for ensuring the logical organization of residential, commercial, industrial, and public facilities, and for encouraging the timely provision of public facilities to meet the needs of the community. A detailed analysis of the consistency of the Proposed Project with applicable goals, objectives, and policies is presented in Table 4.1, below.

**Table 4.1
Project Consistency with Applicable Objectives and Policies of the Land Use Element**

| Goal / Objective / Policy | Project Consistency Analysis |
|--|--|
| <i>Land Use Element</i> | |
| <p>Goal 1: Promote development of a well-balanced and functional mix of residential, commercial, industrial, open space, recreation, and civic uses that will create and maintain a high quality environment.</p> | <p>No Conflict. The Proposed Project would include the demolition of the existing RV rental facility and dealership, including its office building and on-site surface parking, for the construction, use, and maintenance of a 4,980 square-foot car wash center that includes the car wash building, 31 vacuum stations, and three marked queue lines for cars to utilize the facility. The Proposed Project would locate general commercial uses in a hybrid zoning overlay (IGL/GC – Light Industrial Overlay), which encourages a mix of both light industrial land uses and general commercial land uses. This overlay zone encompasses a total of only 24 acres in the entire City, which only comprises approximately</p> |

| Goal / Objective / Policy | Project Consistency Analysis |
|--|---|
| | 0.2 percent of the City's entire land mass. ⁸ Thus, development of the Proposed Project's compatible general commercial uses would be consistent with the on-site zoning that promotes a mix of light industrial and general commercial uses. Therefore, the Proposed Project would facilitate development of a well-balanced mix of commercial and industrial uses that would create and maintain a high-quality environment in the City. Thus, the Proposed Project would not conflict with this Goal. |
| Objective 5.0: Develop industrial uses which are compatible with adjacent land uses. | No Conflict. While the Proposed Project would provide general commercial uses on-site, the Project Site is currently zoned for a mix of both general commercial and industrial uses. The Proposed Project would maintain its current zoning and thus be open to redevelopment in the future that may be industrial in nature. Therefore, the Proposed Project would not conflict with this Objective. |
| Policy 5.3: The City shall ensure that industrial development creates no significant off-site impacts related to access and circulation, noise, dust, odors, visual features, and hazardous materials, that cannot be adequately mitigated. | No Conflict. The proposed car wash facility would not create any significant impacts (on-site or off-site) related to access and circulation, noise, dust, odors, visual features, or hazardous materials. The proposed access and circulation plan has been reviewed by the City's Engineering Department, which has provided comments and conditions and Engineering Division Requirements for the project to comply with (See City Inter-Office Memo dated October 18, 2022). The project would utilize water and car wash cleaning solvents, which would be contained on site within the car wash facility and will not be released into the environment. The car wash facility would not produce any odors or emissions, with the exception of emissions generated by car exhaust, which is consistent with that generated by traffic along Magnolia Avenue. The driveway, queuing lanes and vacuum parking stalls will be entirely paved and therefore will not produce dust. As such, the Proposed Project would not conflict with this Policy. |
| Policy 8.3: The City should encourage an innovative mix of land uses when such a mix could enhance the viability of development and provide for common public services and site planning requirements. | No Conflict. This Policy is directed toward City goals and is not specifically applicable to the Proposed Project. Nonetheless, the Project Site is currently zoned IL/GC with a General Plan Land Use Designation of Light Industrial Overlay, which encourages the siting and development of both light industrial uses and general commercial uses. The Proposed Project would maintain its current zoning and provide general commercial uses on-site. Thus, the Proposed Project would facilitate a mix of land uses and would not conflict with this Policy. |
| Source: Santee General Plan Land Use Element. | |

Therefore, as discussed in preceding paragraphs, the Proposed Project would be consistent with applicable General Plan designations and all applicable General Plan

⁸ City of Santee, General Plan Land Use Element, Table 3, Land Use Plan – Statistical Summary.

policies, as well as with applicable zoning designations and regulations. As such, the Proposed Project would be consistent with Criterion Section 15332(a).

Criterion Section 15332(b): Project Location, Size, and Context

- Yes** **No** The proposed development occurs within city limits on a project site of no more than 5 acres substantially surrounded by urban uses

As shown in Figure 3.2, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site is located in an urbanized area of the City of Santee, entirely surrounded by parcels developed with urban land uses and paved public streets. The Project Site encompasses one parcel and is identified by the following Assessor’s Parcel Number APN: 384-470-33-00. The Project Site comprises approximately 54,450 square feet of lot area (1.26 acres). Therefore, the Project Site occurs within City limits on a site of no more than 5 acres and is surrounded by urban uses. Therefore, the Proposed Project would be consistent with the Criterion Section 15332(b).

Criterion Section 15332(c): Endangered, Rare, or Threatened Species

- Yes** **No** The project site has no value as habitat for endangered, rare or threatened species.

The Project Site is located in an urbanized area of the City of Santee. As shown in Figure 3.2, Aerial Photograph of the Project Site and Surrounding Land Uses, the Project Site and surrounding area are fully developed with urban infrastructure and do not contain any significant areas of natural open spaces or areas of significant biological resource value. The Project Site is currently developed with an RV rental facility and dealership, which includes an office building and on-site surface parking. Vegetation on the Project Site is limited to a linear row of pine trees, shrubbery, and ornamental landscaping along the northern and eastern property lines. Additionally, there is one street tree along Magnolia Avenue, which is owned and maintained by the City. The street tree is not proposed for removal. Tree removals would be conducted in accordance with City policy. The Proposed Project would comply with the Landscape Development Standards outlined in Section 13.36.100 of the SMC, specifically regarding Parking Landscape Standards and General Landscape Standards. California native or drought-tolerant plants shall be used to the maximum extent feasible to minimize the need for irrigation. Where irrigation is necessary, the system shall be designed and installed to prevent overspray or irrigation runoff during normal operations and during a break in the line, in accordance with City policy. The Project Site does not contain any critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the

California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.^{9,10,11}

The Coastal California Gnatcatcher (threatened), Least Bell's Vireo (endangered), Southwestern Willow Flycatcher (endangered), Arroyo Toad (endangered), Monarch Butterfly (candidate), and Quino Checkerspot Butterfly (endangered) are reported to occur within the broader project locale, but the location of the critical habitat for these species does not include the Project Site.¹² Several types of flowering plants were also identified as occurring in the broader project locale, but critical habitat has either not been designated or the designated critical habitat does not include the Project Site.¹³

Endemic Environmental Services conducted a biological field survey at the Project Site on July 25, 2023 (see Attachment 8 of this Categorical Exemption). The land cover on the Project Site, including the minimal landscaping, does not provide suitable habitat for the special-status species identified as having the potential to occur through the California Natural Diversity Database (CNDDDB) query and the list of species covered under the San Diego Multiple Species Conservation Program (MSCP). The nearest potentially suitable habitat for special-status wildlife species observed during the biological field survey was sage scrub that may serve as coastal California gnatcatcher (*Polioptila californica californica*) habitat. This area, however, is located approximately 500 feet away from the Project Site. As such, no special-status wildlife species are expected to occur on the Project Site. Additionally, no special-status plants were observed during the biological field survey, nor is the Project Site expected to provide suitable habitat for any special-status plant species.

The Project Site is not located within any of the designated open space or managed preserve lands established in the City of Santee Draft Multiple Species Conservation Program (MSCP) Subarea Plan. The Project Site is fully developed and is located in a built-up, urban area. Therefore, the Proposed Project would not conflict with the City of Santee Draft MSCP Subarea Plan.

The Proposed Project would result in the removal of trees, shrubs, and vegetation on the Project Site, which are ornamental in nature. During the biological field survey, the Project Site was determined to have suitable nesting habitat for birds protected under the Migratory Bird Treaty Act (MBTA), and seven native bird species protected under

⁹ U.S. Fish and Wildlife Service, *Critical Habitat for Threatened and Endangered Species*, <https://fws.maps.arcgis.com/home/webmap/viewer.html?webmap=9d8de5e265ad4fe09893cf75b8dbfb77>, accessed January 2023.

¹⁰ U.S. Fish and Wildlife Service, *Information for Planning and Consultation (IPaCs) Webpage*, <https://ipac.ecosphere.fws.gov/>, accessed January 2023. See Attachment 6 of this Categorical Exemption.

¹¹ California Department of Fish and Wildlife, *California Natural Diversity Database, CNDDDB Maps and Data*, <https://apps.wildlife.ca.gov/bios6/?tool=cnddbqv>, accessed January 2023.

¹² U.S. Fish and Wildlife Service, *Information for Planning and Consultation (IPaCs) Webpage*, <https://ipac.ecosphere.fws.gov/>, accessed January 2023. See Attachment 6 of this Categorical Exemption.

¹³ *Ibid.*

the MBTA were observed. Raptors were not observed during the survey and suitable raptor nesting habitat is not present on the Project Site or within approximately 1,000 feet of the site. A list of plant and wildlife species observed during the biological field survey is included in Appendix A of the Biological Survey Memorandum. A list of CNDDDB occurrences within one mile of the Project Site is included in Appendix B of the Biological Survey Memorandum. While the removal of non-protected trees would not be considered a significant impact under CEQA, the removal of trees has the potential to impact nesting bird species, if they are present at the time of tree removal. Nesting birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (*Title 16, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulations, Part 20*) and Section 3503 of the California Department of Fish and Game Code. As a standard condition imposed for compliance with these regulatory requirements, the Proposed Project would avoid tree removal activities during the breeding season and/or follow other regulatory guidelines to ensure that the trees proposed for removal are not occupied by nesting birds. Moreover, the following standard condition of approval imposed for compliance with the regulatory requirements in the MBTA will operate to limit construction activities during nesting seasons:

Construction, including tree removal, shall not occur during bird nesting season, which is generally between February 15 and August 15. If it is not feasible to avoid construction, including tree removal, during the bird nesting season, then a pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to the start of construction to determine if active nests are present in trees to be removed. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least two years of experience conducting biological field surveys, including surveys for nesting birds.

Therefore, the Project Site has no value as habitat for endangered, rare, or threatened species, and the Proposed Project would not have a significant impact on any sensitive species or habitat. As such, the Proposed Project would be consistent with Criterion Section 15332(c).

Criterion Section 15332(d): Traffic, Noise, Air Quality, or Water Quality

Yes

No

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Traffic

The following information summarizes the findings and conclusions of the Traffic Impact Statement submitted by Y2K Engineering, LLC.¹⁴

Existing Transportation Network

Magnolia Avenue is a northwest-southeast-aligned roadway classified as a Prime Arterial in the City's Mobility Plan. Three through-lanes are provided in each direction, separated by a raised median. Streetlights, sidewalks, curbs, and gutters are available on both sides of the road. Bike lanes are not present along this roadway within the vicinity of the Project Site.

Rockvill Street is a northeast-southwest-aligned roadway classified as a Collector Industrial Street in the City's Mobility Plan and provides a two-lane undivided roadway which extends approximately 700 feet beyond its intersection at Magnolia Avenue before making a 90 degree right turn and terminates in a cul-de-sac. Roadway improvements such as a curb, gutter, sidewalks, and streetlights are located on both sides. Bike lanes are not present along this roadway.

Proposed Development and Access

The Proposed Project would demolish the existing RV rental and dealership facility and construct an automated car wash facility with a 140-foot wash tunnel, 31 vacuum stations, and three queue lines with pay stations. Access to the proposed car wash would be through two driveways: one full-access driveway along Rockvill Street (the existing two driveways would be consolidated into one full access driveway on the southeastern side of the Project Site) and a cross-access agreement with the adjacent parcel north to provide a full-access driveway on the northeastern side of the Project Site. It is expected, however, that the majority of vehicles will enter the car wash through the southeastern driveway along Rockvill Street.

Trip Generation

The Institute for Transportation Engineers Trip Generation Manual, 11th Edition (ITE Trip Generation Manual) contains data collected by various transportation professionals for a wide range of different land uses. The ITE Trip Generation Manual does not provide

¹⁴ See Attachment 3 to this Categorical Exemption.

data for the daily and A.M. peak hour for the Automated Car Wash land use, and as such, data from the “(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region” (SANDAG) was used. Trip generation estimates for the weekday A.M. and P.M. peak hour are provided in Table 4.2, below.

**Table 4.2
Proposed Project Trip Generation**

| Description of Land Use | | Vehicle Generated Trips | | | | | | |
|---|-------------------|-------------------------|----------------|------|----------------|-------|------|-------|
| | | Daily | A.M. Peak Hour | | P.M. Peak Hour | | | |
| Land Use | Size | Total | Enter | Exit | Total | Enter | Exit | Total |
| Super Star Car Wash ^a | 1 Car Wash Tunnel | 900 | 18 | 18 | 36 | 41 | 41 | 82 |
| <i>Note:</i> ^a Based on “(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region.” Source: Y2K Engineers, LLC. (See Attachment 3 to this Categorical Exemption). | | | | | | | | |

As shown above, the Proposed Project is anticipated to generate a total of 36 A.M. peak hour trips (entering and exiting) and 82 weekday P.M. peak hour trips (entering and exiting). However, a significant number of trips to and from the Project Site would be considered “pass-by” in nature, meaning they are trips that are already occurring on the surrounding roadway network and would convert from a through-movement into a turning movement to access the Proposed Project’s car wash services. According to the City of Santee VMT Analysis Guidelines dated April 2022, local serving projects do not require a VMT analysis. The Proposed Project is a car wash and is considered local serving, therefore, a VMT analysis is not required. As such, the trips generated by the proposed car wash are not anticipated to equate to the total net trips added to the roadway as a result of the Proposed Project.

On-Site Circulation and Queueing

As shown in Figure 2 and Attachment A of the Traffic Impact Analysis provided by Y2K Engineers, LLC, three proposed queue lanes on the northern side of the Project Site would allow customers to order, pay, and wait to proceed through the car wash tunnel. The queue lanes are provided in advance of the car wash tunnel, which would allow for approximately 200 feet of queueing per lane. It is estimated that around 24 vehicles (8 per lane) would be able to queue before impacting access to the drive aisle within the Project Site. The queue in each of the three lanes would only be for payment before entering the car wash tunnel, as the Proposed Project is not a full-service car wash site that vacuums vehicles prior to entering the tunnels. Vacuum stations are provided for customer use and are located along a bidirectional drive aisle in the middle of the Project Site. Thus, the queue is not anticipated to extend more than three or four vehicles at once, and ample storage is expected to be provided in the designated queueing area, per the site plan. Between the car wash pad, queueing lane connections, and vacuum stalls drive aisle, there is expected to be sufficient internal circulation on the Project Site

which would not be anticipated to impact the surrounding existing environment.

Conclusions

Y2K Engineers, LLC, concluded that the Proposed Project is anticipated to generate a total of 36 trips entering and exiting the Project Site during the weekday A.M. peak hour and a total of 82 trips entering and exiting the Project Site during the weekday P.M. peak hour. However, a significant number of these trips to and from the Project Site would be considered “pass-by” in nature, meaning they are trips that are already occurring on the surrounding roadway network and would convert from a through-movement into a turning movement to access the Proposed Project’s car wash services. As such, the trips generated by the proposed car wash are not anticipated to equate to the total net trips added to the roadway as a result of the Proposed Project. Based on SANDAG’s Brief Guide of Vehicular Traffic Generation rates for the San Diego Region, the Proposed Project is expected to generate approximately 900 daily vehicle trips. Because the daily trips generated by the Proposed Project are under 1,000 trips, a full traffic study with LOS analysis is not required. Therefore, the Proposed Project is not expected to have a significant impact on the surrounding roadway network. Additionally, the Proposed Project is considered a local serving project, therefore, a VMT analysis was not required. Approximately 24 vehicles may queue within the three queue lanes before impacting the internal drive aisle within the Project Site. Significant queuing is not anticipated and is not expected to extend beyond the Project Site at either driveway access point. Therefore, the Proposed Project would not result in any significant impacts to traffic.

Noise

The following information summarizes the findings and conclusions of the Noise Impact Study submitted by MD Acoustics (see Attachment 2 to this Categorical Exemption).

Noise levels are often measured in decibels (dB) and are expressed in A-weighted decibels (dBA), which is a more accurate representation of how the human ear perceives sound. For purposes of determining the Proposed Project’s construction noise impacts, a significant impact would occur if the Proposed Project were not in conformance with either the City’s General Plan Noise Element (Noise Element) or the SMC, specifically Chapter 5.04, Noise Abatement and Control.

General Plan Noise Element

Regarding thresholds of significance pertaining to CEQA analysis, the City’s Noise Element states that noise impacts shall be considered significant if any of the following occur as a result of a proposed development:

1. If, as a direct result of the proposed development, noise levels for any existing or planned development will exceed the noise levels considered compatible for that

use as identified in Figure 7-3, Noise / Land Use Compatibility Guide.

2. If, as a direct result of the proposed development, noise levels which already exceed the levels considered compatible for that use are increased by 3 or more decibels.

The Noise Element further states that development standards should be applied to future projects during the discretionary review process and should include the following:

1. Whenever it appears that new development will result in any existing or future noise sensitive uses being subjected to noise levels above 65 dBA L_{dn} , or greater, an acoustical study will be required. (L_{dn} is an abbreviation of the Day-Night-Average Sound Level, which is a measurement of the overall noise experienced during an entire day. In the L_{dn} scale, noise levels that occur during the night (10:00 p.m. to 7:00 a.m.) are penalized by 10 dB to reflect the fact that noise at these times is perceived as being louder and to account for increased human sensitivity to noise during the quieter period of the day, where home and sleep is the most probable activity).
2. If the acoustical study shows that the noise levels at any noise sensitive area will exceed 65 dBA L_{dn} , the development should not be approved unless the following findings are made:
 - a. Modifications to the development have been or will be made which will reduce the exterior noise level in noise sensitive areas to 65 dBA L_{dn} or less, or
 - b. If, with current noise abatement technology, it is not feasible to reduce the exterior noise level to 65 dBA L_{dn} or less, then modifications to the development will have been or will be made which reduce the exterior noise level to the maximum extent feasible and the interior noise level to 45 dBA L_{dn} or less. Particular attention shall be given to noise sensitive spaces such as bedrooms.

For rooms in noise sensitive areas which are occupied only for a part of the day (schools, libraries, or similar), the interior on-hour average sound level during occupation, due to noise outside, should not exceed 45 dBA L_{eq} .

Municipal Code Chapter 5.04, Noise Abatement and Control

Chapter 5.04, Noise Abatement and Control contains the following noise regulation that will be required to the Proposed Project's temporary construction activities:

5.04.090 Construction Equipment

- A. Prohibitions. Except for emergency work or work that has been expressly

approved by the City, it is unlawful for any person to operate any single or combination of powered construction equipment at any construction site, as follows:

1. It is unlawful for any person to operate any single or combination of powered construction equipment at any construction site on Mondays through Saturdays except between the hours of 7:00 a.m. and 7:00 p.m., unless expressly approved by the Director of Planning & Building.
2. It is unlawful for any person to operate any single or combination of powered construction equipment at any construction site on Sundays or City recognized holidays unless expressly approved by the Director of Planning & Building.
3. No construction equipment is permitted to be started, idled, moved or operated at any location before 7:00 a.m. or after 7:00 p.m. on Mondays through Saturdays and all times on Sundays and holidays, described in subsection (A)(2) of this section. Specific exemptions may be authorized by the Director of Planning & Building.
4. Construction equipment with a manufacturer's noise rating of 85 dBAL_{MAX} or greater, may only operate at a specific location for 10 consecutive workdays. If work involving such equipment will involve more than 10 consecutive workdays, a notice must be provided to all property owners and residents within 300 feet of the site no later than 10 days before the start of construction. The notice must be approved by the City and describe the project, the expected duration, and provide a point of contact to resolve noise complaints. (Ord. 558 § 3, 2019).

Section 5.04.160 Limitations on Noise Not Otherwise Addressed

For any noise source not specifically addressed in this chapter, except where exempted or excluded by Section 5.04.170, the following general limitations apply:

- A. Between 10:00 p.m. and 7:00 a.m., it is unlawful for any person to generate any noise on the public way that is louder than average conversational level at a distance of 50 feet or more, vertically or horizontally, from the source.
- B. Between 10:00 p.m. and 7:00 a.m., no person is permitted to generate any noise on any private open space that is louder than average conversational level at a distance of 50 feet or more, measured from the property line of the property which the noise is being generated.

Construction Noise

SMC Compliance

The Proposed Project would have the potential to generate increased noise levels during project construction activities. Construction noise would be temporary and intermittent during the anticipated 6 month construction process. The Proposed Project would be required to comply with all City regulations regarding construction noise pursuant to Sections 5.04.090 of the SMC, as identified above. Compliance with these standard citywide regulations would reduce construction noise impacts to less than significant levels.

The following summarizes and incorporates by reference the Noise Impact Study prepared and submitted by MD Acoustics on August 25, 2023.¹⁵

Construction Noise

Construction noise is considered a short-term impact and would be considered significant if construction activities occur outside the allowable times as Section 5.04.090 of the SMC. Construction of the Proposed Project is anticipated to occur during the permissible hours according to Section 5.04.090 of the SMC. Construction noise will have a temporary or periodic increase in the ambient noise level above the existing within the Project vicinity. Additionally, noise reduction regulatory compliance measures are provided below to further reduce construction noise. Because construction of the Proposed Project would occur during the permissible hours described by the SMC, construction noise impacts would be less than significant. However, for informational purposes, construction noise level projections are provided in Appendix D of the Noise Impact Study and typical construction equipment for the Proposed Project is listed in Table 5 of the Noise Impact Study. Noise levels will be loudest during the paving phase. A likely worst-case construction noise scenario during paving assumes the use of a paver, two rollers, a backhoe, paving equipment, and a concrete mix truck operating at 140 feet from the nearest sensitive receptor (measured from the center of the Project Site to the church façade to the north). The Noise Impact Study concluded that the construction noise impact is considered less than significant because construction of the Proposed Project would occur during the permissible hours detailed in Section 5.04.090 of the SMC.

Construction Vibration

Construction activities can produce vibration that may be felt by adjacent land uses. The primary vibration source during construction of the Proposed Project may be from a bulldozer. As shown in Table 6 of the Noise Impact Study, the threshold for maximum Peak Particle Velocity (PPV) (in/sec) from continuous/frequent intermittent sources

¹⁵ See Attachment 2 of this Categorical Exemption.

ranges from 0.08 PPV to 0.5 PPV depending on the structure and condition of the adjacent land uses. At a distance of 65 feet (measured from the Project Site property line to the church façade to the north), a large bulldozer would yield a worst-case 0.031 PPV which may be perceptible for short periods of time during grading along the northern property line of the Project Site, but is below any threshold of damage. Therefore, construction vibration impacts are less than significant. Calculation sheets for construction vibration are provided in Appendix D of the Noise Impact Study.

Construction Noise Project Design Features

To further ensure that construction activities do not disrupt the adjacent land uses, the following construction Project Design Features will be required:

- Construction shall occur during the permissible hours as defined in Section 5.04.090 of the SMC.
- During construction, the contractor shall ensure all construction equipment is equipped with appropriate noise attenuating devices.
- The contractor shall locate equipment staging areas that will create the greatest distance between construction-related noise/vibration sources and sensitive receptors nearest the Project Site during all Project construction.
- Idling equipment shall be turned off when not in use.
- Equipment shall be maintained so that vehicles and their loads are secured from rattling and banging.

Operational Noise

The following summarizes and incorporates by reference the Noise Impact Study prepared and submitted by MD Acoustics on August 25, 2023.¹⁶

Noise Sensitive Receptors

A total of four receptors were modeled to evaluate the Proposed Project's operational impacts. Receptors 1 and 2 include the church to the north of the Project Site; receptor 3 represents the light industrial use to the east of the Project Site; and receptor 4 represents the church located southeast of the Project Site, across Rockvill Street.¹⁷

¹⁶ See Attachment 2 of this Categorical Exemption.

¹⁷ See Exhibit F in Attachment 2 of this Categorical Exemption.

Existing Baseline Noise

Noise monitoring locations were selected based on the distance of the Proposed Project's stationary noise sources to the nearest sensitive receptors. One 24-hour noise measurement was conducted near the Project Site to represent the existing noise level in the surrounding area, which determined that the ambient noise level was 53.2 dBA L_{dn}. The Noise Impact Study utilizes this ambient noise measurement as a basis for comparison with the Proposed Project's operational noise. The location of the noise measurement is illustrated in Exhibit E of the Noise Impact Study.¹⁸

Proposed Project Operational Noise

To determine the Proposed Project's operational noise impacts, a worst-case scenario was modeled, assuming that all blowers, vacuums, turbines, and equipment is all operated at the same time between the hours of 7:00 a.m. and 8:00 p.m. The Noise Impact Study compares the Proposed Project's operational noise levels to two different noise assessment scenarios: (1) Project-Only Operational Noise Level, and (2) Project Plus Ambient Noise Level Projections.

Project-Only Operational Noise Levels

Operational noise levels for the Project-Only scenario are anticipated to range between 56 dBA L_{dn} to 58 dBA L_{dn} at adjacent uses, which does not exceed the City's 65 dBA L_{dn} threshold.

Project Plus Ambient Operational Noise Levels

The Proposed Project plus ambient noise level projections are anticipated to range between 58 dBA L_{dn} and 59 dBA L_{dn} at adjacent receptors, which still does not exceed the City's 65 dBA L_{dn} threshold.¹⁹

Findings and Conclusions

The Noise Impact Study concluded that the existing baseline noise level of 53.2 dBA L_{dn} is exceeded by the Proposed Project's worst-case operational noise level under both the Project-Only Operational Noise Levels scenario and the Project Plus Ambient Operational Noise Levels scenario. In addition, the increase in ambient noise level to the sensitive noise receptors is noticeable. However, these impacts remain less than significant since the projected noise levels from both the Project-Only scenario and the Project Plus Ambient scenario are both below the established City noise regulations. The following project design feature shall be implemented to ensure the Proposed Project's operational noise compliance with the City's noise regulations:

¹⁸ See Attachment 2 of this Categorical Exemption.

¹⁹ See Tables 3 and 4 in Attachment 2 of this Categorical Exemption.

Project Design Feature – Operational Noise

- The Proposed Project shall incorporate a 120 HP International Dryer Company dryer system or equivalent to meet the acoustical benchmarks. Any modification would require a re-evaluation.²⁰
- The use of the 120 HP International Dryer Corporation equipment is proposed as a Project Design Feature and is recommended for Proposed Project approval.

With the implementation of standard regulatory compliance and the project design features listed above, construction and operational noise levels would be compliant with the noise abatement requirements of Chapter 5.04 of the SMC and the Noise Element. Therefore, both temporary construction-related noise and operational noise impacts would be considered less than significant in accordance with the City's municipal code and Noise Element requirements and standards.

Air Quality

The Project Site is located in the San Diego Air Basin (SDAB). The SDAB is classified as in attainment of National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for all criterion pollutants except ozone, particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5}). However, PM_{2.5} is in attainment for the state standard but not the federal standard. Ozone is not emitted directly but is a result of atmospheric activity on ozone precursors of nitrogen oxide (NO_x) and volatile organic compounds (VOCs), which react in the presence of sunlight to produce ozone.

The San Diego Air Pollution Control District (SDAPCD), which regulates air pollutant emissions in the SDAB, does not provide specific numeric significance thresholds for a project's air pollutant emissions for determining the significance of air quality impacts under CEQA. However, SDAPCD does specify screening-level thresholds that would trigger an Air Quality Impact Analysis for new or modified stationary sources.^{21,22} These screening-level thresholds were used to evaluate existing baseline emissions on the Project Site and for the Proposed Project's construction and operational emissions.

²⁰ See Appendix B of Attachment 2 of this Categorical Exemption.

²¹ San Diego Air Pollution Control District, Rule 20.2 New Source Review Non-Major Stationary Sources, 2020, <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-20.2.pdf>, accessed January 2023.

²² San Diego Air Pollution Control District, Rule 20.3 New Source Review, Major Stationary Sources and PSD Stationary Sources, 2022, <https://www.sdapcd.org/content/dam/sdapcd/documents/rules/current-rules/Rule-20.3.pdf>, accessed January 2023.

Construction Emissions

With respect to air quality emissions from construction activities, the Proposed Project would be required to comply with all applicable City, regional, state, and federal regulatory compliance measures from agencies including, but not limited to, the City of Santee, the SDAPCD, and the California Code of Regulations. As required by CEQA, the Proposed Project's construction emissions were quantified utilizing the California Emissions Estimator Model (*CalEEMod Version 2020.4.0*). Table 4.3, below, identifies daily emissions that are estimated to occur on peak construction days for each phase of the Proposed Project's construction.

This analysis assumes a Project construction schedule of approximately 6 months, with final buildout occurring in 2024. Construction activities associated with the Proposed Project would be undertaken in four main steps: (1) demolition/site clearing, (2) building construction, (3) architectural coatings/finishings, and (4) paving.

As shown in Table 4.3, construction-related daily emissions associated with the Proposed Project would not exceed any regional SDAPCD significance thresholds for criteria pollutants during construction. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required and regulated by SDAPCD Rule 55 – Fugitive Dust Control. Therefore, temporary construction-related air quality impacts would be considered less than significant.

**Table 4.3
Estimated Peak Daily Construction Emissions**

| Emission Source | Emissions in Pounds per Day | | | | | |
|---|-----------------------------|-----------------|--------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO ₂ | PM ₁₀ | PM _{2.5} |
| Demolition/Site Clearing | | | | | | |
| On-Site Fugitive Dust | -- | -- | -- | -- | 0.04 | <0.01 |
| On-Site Off-Road Diesel Equipment | 2.49 | 24.03 | 20.22 | 0.04 | 1.13 | 1.06 |
| Off-Site Hauling/Vendor/Worker Trips | 0.05 | 0.10 | 0.45 | <0.01 | 0.16 | 0.04 |
| Total Emissions | 2.54 | 24.13 | 20.67 | 0.04 | 1.33 | 1.10 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Building Construction | | | | | | |
| On-Site Off-Road Diesel Equipment | 1.32 | 9.22 | 11.54 | 0.02 | 0.41 | 0.40 |
| Off-Site Hauling/Vendor/Worker Trips | 0.05 | 0.08 | 0.45 | <0.01 | 0.16 | 0.04 |
| Total Emissions | 1.37 | 9.30 | 11.99 | 0.02 | 0.57 | 0.44 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Architectural Coating | | | | | | |
| On-Site Architectural Coating | 6.32 | -- | -- | -- | 0.00 | 0.00 |
| On-Site Off-Road Diesel Equipment | 0.64 | 4.98 | 7.62 | 0.01 | 0.23 | 0.23 |
| Off-Site Hauling/Vendor/Worker Trips | 0.04 | 0.02 | 0.31 | <0.01 | 0.11 | 0.03 |
| Total Emissions | 7.00 | 5.00 | 7.93 | 0.01 | 0.34 | 0.26 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| Paving | | | | | | |
| On-Site Off-Road Diesel Equipment | 0.64 | 6.24 | 8.80 | 0.01 | 0.31 | 0.28 |
| Off-Site Hauling/Vendor/Worker Trips | 0.04 | 0.02 | 0.31 | <0.01 | 0.11 | 0.03 |
| Total Emissions | 0.68 | 6.26 | 9.11 | 0.01 | 0.42 | 0.31 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Significant Impact? | No | No | No | No | No | No |
| <p><i>Note:</i> SDAPCD Screening-Level Thresholds found in Table 5 of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirement – Air Quality, dated March 19, 2007, https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf, accessed January 2023. Calculation sheets are provided in Attachment 4 to this Categorical Exemption. Source: CalEEMod Version 2020.4.0; Parker Environmental Consultants.</p> | | | | | | |

Operational Emissions

Existing Emissions

The Project Site is currently developed with an RV rental facility and dealership, including an office building and associated on-site parking. The existing uses generate air pollutant emissions from space sources, such as space and water heating, architectural coatings (paint), and mobile sources, such as vehicular traffic traveling to and from the Project Site. The average daily emissions generated by the existing uses at the Project Site have been estimated utilizing CalEEMod. As shown in Table 4.4, mobile sources are the primary source of air pollutant emissions associated with existing uses at the Project Site.

**Table 4.4
Existing Daily Operational Emissions from the Project Site**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|--|-----------------------------|-----------------|-------------|-----------------|------------------|-------------------|
| | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Summertime (Smog Season) Emissions | | | | | | |
| Area Sources | 0.06 | 0.00 | <0.01 | 0.00 | 0.00 | 0.00 |
| Energy Sources | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 |
| Mobile Sources | 0.03 | 0.03 | 0.28 | <0.01 | 0.06 | 0.02 |
| Total Emissions | 0.09 | 0.03 | 0.28 | <0.01 | 0.06 | 0.02 |
| Wintertime (Non-Smog Season) Emissions | | | | | | |
| Area Sources | 0.06 | 0.00 | <0.01 | 0.00 | 0.00 | 0.00 |
| Energy Sources | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 | <0.01 |
| Mobile Sources | 0.03 | 0.04 | 0.29 | <0.01 | 0.06 | 0.02 |
| Total Emissions | 0.09 | 0.04 | 0.29 | <0.01 | 0.06 | 0.02 |
| <i>Note: Calculation worksheets are provided in Attachment 4 to this Categorical Exemption. Source: CalEEMod Version 2020.4.0; Parker Environmental Consultants.</i> | | | | | | |

Proposed Project Emissions

The Proposed Project would result in the demolition of the RV rental facility and dealership office building and associated on-site surface parking for the construction, use, and maintenance of a car wash center that includes 31 vacuum stations. The Proposed Project would generate both stationary and mobile emissions, including the consumption of electricity for facility operations, and vehicles traveling to and from the Project Site. The analysis of daily operational emissions associated with the Proposed Project has been prepared utilizing CalEEMod. As shown in Table 4.5, Proposed Project Estimated Daily Regional Operational Emissions, below, operational emissions generated by the Proposed Project would not exceed the regional thresholds of significance set by the SDAPCD. Therefore, impacts associated with regional operational emissions from the Proposed Project would be less than significant.

In addition, as with other projects in the SDAB, the Proposed Project would be required to comply with SDAPCD Rules and Regulations, such as preventing “track out” onto streets, and limitations on idling time. Specific rules applicable to the Proposed Project and other construction sites in the air basin include the following: Rule 50 (Visible Emissions), Rule 51 (nuisance), Rule 52 (particulate matter), Rule 54 (dust and fumes), Rule 55 (Fugitive Dust Control), and Rule 67 (architectural coatings), all of which shall be adhered to as required by SDAPCD. Compliance with these standards would ensure that cumulative air quality impacts would be reduced to less than significant.

**Table 4.5
Proposed Project Estimated Daily Regional Operational Emissions**

| Emissions Source | Emissions in Pounds per Day | | | | | |
|---|-----------------------------|-----------------|---------------|-------------------|------------------|-------------------|
| | ROG | NO _x | CO | SO _x | PM ₁₀ | PM _{2.5} |
| Summertime (Smog Season) Emissions | | | | | | |
| Area Sources | 0.16 | <0.01 | <0.01 | 0.00 | 0.00 | 0.00 |
| Energy Sources | <0.01 | 0.02 | 0.02 | <0.01 | <0.01 | <0.01 |
| Mobile Sources | 1.10 | 0.95 | 8.28 | 0.02 | 1.75 | 0.48 |
| Stationary Sources | 0.82 | 3.67 | 2.09 | <0.01 | 0.12 | 0.12 |
| Total Project Emissions: | 2.08 | 4.64 | 10.39 | 0.02 | 1.87 | 0.60 |
| <i>Less Existing Emissions:</i> | <i>(0.09)</i> | <i>(0.03)</i> | <i>(0.28)</i> | <i>(<0.01)</i> | <i>(0.06)</i> | <i>(0.02)</i> |
| NET Project Site Emissions: | 1.99 | 4.61 | 10.11 | 0.02 | 1.81 | 0.58 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Potentially Significant | No | No | No | No | No | No |
| Wintertime (Non-Smog Season) Emissions | | | | | | |
| Area Sources | 0.16 | <0.01 | <0.01 | 0.00 | 0.00 | 0.00 |
| Energy Sources | <0.01 | 0.02 | 0.02 | <0.01 | <0.01 | <0.01 |
| Mobile Sources | 1.06 | 1.03 | 8.69 | 0.02 | 1.75 | 0.48 |
| Stationary Sources | 0.82 | 3.67 | 2.09 | <0.01 | 0.12 | 0.12 |
| Total Project Emissions: | 2.04 | 4.72 | 10.80 | 0.02 | 1.87 | 0.60 |
| <i>Less Existing Emissions:</i> | <i>(0.09)</i> | <i>(0.04)</i> | <i>(0.29)</i> | <i>(<0.01)</i> | <i>(0.06)</i> | <i>(0.02)</i> |
| NET Project Site Emissions: | 1.95 | 4.68 | 10.51 | 0.02 | 1.81 | 0.58 |
| SDAPCD Thresholds | 75 | 250 | 550 | 250 | 100 | 55 |
| Potentially Significant | No | No | No | No | No | No |
| <p><i>Source:</i> SDAPCD Screening-Level Thresholds found in Table 5 of the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirement – Air Quality, dated March 19, 2007, https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Guidelines.pdf, accessed January 2023. Calculation sheets are provided in Attachment 4 to this Categorical Exemption. Source: CalEEMod Version 2020.4.0; Parker Environmental Consultants.</p> | | | | | | |

Compliance with applicable regulations discussed above would ensure that the Proposed Project would not cause or result in a cumulatively considerable net increase of any criterion pollutant or increase the frequency or severity of any existing non-attainment status. As a result, the Proposed Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant.

Greenhouse Gas Emissions

Guidance from the State on Class 32 Categorical Exemptions does not require the preparation of greenhouse gases analyses for projects eligible for exemptions. Specifically, Article 19 of the State’s CEQA Guidelines states that eligible projects that qualify for categorical exemptions are deemed not to have a significant effect on the environment. Under Section 15332, the Class 32 Exemption that governs in-fill

development projects identifies the conditions under which a project can qualify, noting that “[a]pproval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality...” There are no requirements to making findings about a project’s effects on greenhouse gases. As there is no requirement for preparation of greenhouse gases analyses to validate the Class 32 Exemption, the following is provided for informational purposes only.

The California Air Pollution Control Officers Association (CAPCOA) developed a screening level of an annual 900 metric tons of carbon dioxide equivalent (CO₂eMTY) limit in their CEQA & Climate Change white paper as a theoretical basis for screening-out from further analysis smaller residential and non-residential (commercial, office) uses that emit low-levels of greenhouse gas (GHG) emissions.²³ This annual 900 CO₂eMTY screening level is being used by San Diego County as a conservative criterion for determining the size of projects that would require further analysis and potential mitigation with regard to GHG emissions.²⁴ Thus, if a proposed general commercial or office space would be less than 35,000 square feet, it is presumed that the construction and operational GHG emissions would not exceed 900 CO₂eMTY and thus would not have a significant impact on existing conditions, nor create a cumulatively considerable amount of GHG emissions. It should also be noted that the 900 CO₂eMTY is among the most conservative proposed or used by any agency in California. For example, the South Coast Air Quality Management District is currently utilizing an annual threshold of 3,000 CO₂eMTY for residential projects of which they are the Lead Agency.²⁵

Because neither the City nor SDAPCD have adopted quantitative thresholds of significance for a commercial car wash project’s generation of GHGs, the following analysis is based on a combination of the Proposed Project’s consistency with applicable plans, policies, and building code regulations that have been adopted for the purpose of reducing GHG emissions and the requirements outlined in the CEQA Guidelines.

As required in Section 15064.4 of the CEQA Guidelines, this analysis includes an impact determination based on the following: (1) the extent to which the Proposed Project may increase or reduce greenhouse gas emissions as compared to the existing

²³ California Air Pollution Control Officers Association CAPCOA, *CEQA & Climate Change, Evaluating and Addressing Greenhouse Gas Emissions from Project Subject to the California Environmental Quality Act*, January 2008, <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf>, accessed January 2023.

²⁴ County of San Diego, *Planning and Development Services, 2015 GHG Guidance, Recommended Approach to Addressing Climate Change in CEQA Documents*, January 21st, 2015, <https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Sweetwater-Place/PDS2014-TM-5588-Greenhouse-Gas-Guidance-2015.pdf>, accessed January 2023.

²⁵ South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #15, September 28, 2010*, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf), accessed January 2023.

environmental setting; (2) whether the Proposed Project’s emissions exceed a threshold of significance that the lead agency determines applies to the Proposed Project; and (3) the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. The CEQA Guidelines do not mandate the use of absolute numerical thresholds to measure the significance of GHG emissions. As such, this analysis relies on the extent to which the Proposed Project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the purpose of reducing or mitigation of GHG emissions.

Construction

GHG emissions were calculated Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Site. Emissions of GHGs were calculated using CalEEMod (*Version 2020.4.0*) for the approximate six-month construction schedule for the Proposed Project. As shown below in Table 4.6, the total GHG emissions from construction activities related to the Proposed Project would be approximately 119 metric tons, with the greatest annual emissions occurring in 2023. Total construction greenhouse gas emissions are amortized over the 30-year life of the Proposed Project and added to the total operational impacts.

**Table 4.6
Proposed Project Construction-Related Greenhouse Gas Emissions**

| Year | CO₂e Emissions (Metric Tons per Year) ^a |
|---|--|
| 2023 | 118.67 |
| Total Construction GHG Emissions: | 118.67 |
| ^a Construction CO ₂ values were derived using CalEEMod Version 2020.4.0 Calculation data and results are provided in Attachment 5 Greenhouse Gas Emissions Worksheets. Source: Parker Environmental Consultants. | |

Operation

Baseline GHG Emissions

The existing Project Site is currently developed with an RV rental facility and dealership and on-site surface parking. The operation of the RV rental facility and dealership generate GHG emissions as a result of vehicle trips and office building operations involving the use of electricity, potable water, and generation of solid waste and wastewater. The average daily GHG emissions generated by the existing Project Site have been estimated utilizing the CalEEMod computer model. As shown in Table 4.7,

Existing Project Site Greenhouse Gas Emissions, the existing operations on the Project Site generate approximately 21.44 CO₂eMTY.

**Table 4.7
Existing Project Site Greenhouse Gas Emissions**

| Emissions Source | CO ₂ e Emissions (Metric Tons per Year) ^a |
|--|--|
| Area | <0.1 |
| Energy | 6.23 |
| Mobile | 9.95 |
| Waste | 4.03 |
| Water | 1.23 |
| Total | 21.44 |
| ^a Greenhouse gas emissions were estimated using CalEEMod Version 2020.4.0. Calculation data and results provided in Attachment 5 to this Categorical Exemption. Source: Parker Environmental Consultants. | |

Project GHG Emissions

GHG emissions resulting from operation of the Proposed Project, which involve the usage of on-road mobile vehicles, electricity, water, landscape equipment, and generation of solid waste and wastewater, was calculated using CalEEMod (Version 2020.4.0). The modeling analysis assumes implementation of Title 24 Building Energy Efficiency Standards, including Part 11 of Title 24, also called CALGreen. As shown below in Table 4.8, Proposed Project Operational Greenhouse Gas Emissions, the net increase in GHG emissions generated by the Proposed Project is approximately 302 CO₂eMTY, which is well below the 900 CO₂eMTY per year screening criteria considered by the County but not adopted by the City.

Plan Consistency

Through requirements of the Title 24 Building Energy Efficiency Standards, including CALGreen and the Project Site’s location on an infill site, the Proposed Project would be consistent with local and statewide goals and policies aimed at reducing the generation of GHG emissions, including SB 32 and CARB’s 2022 Scoping Plan.

Infill Development. The Project Site is located on an infill site that is currently developed with a commercial office building and adjacent surface parking. The Proposed Project is also located in an area that is adequately served by existing infrastructure and would not require the extension of utilities or roads to accommodate the proposed development.

**Table 4.8
Proposed Project Operational Greenhouse Gas Emissions**

| Emissions Source | Estimated Project Generated CO ₂ e Emissions (Metric Tons per Year) |
|--|---|
| Area | <0.01 |
| Energy | 15.78 |
| Mobile (Motor Vehicles) | 276.69 |
| Stationary | 4.59 |
| Waste | 5.76 |
| Water | 16.25 |
| Construction Emissions ^a | 3.96 |
| Proposed Project Total: | 323.03 |
| <i>Less Existing Emissions:</i> | <i>(21.44)</i> |
| Net Total GHG Emissions: | 301.59 |
| <p><i>Notes:</i> ^a <i>The total construction GHG emissions were amortized over 30 years and added to the operation of the Proposed Project. Calculation data and results provided in Attachment 5 to this Categorical Exemption. Source: Parker Environmental Consultants.</i></p> | |

Energy Conservation. The Proposed Project would include development standards such as high-efficiency equipment and fixtures that meet the Title 24 Building Energy Efficiency Standards, including Part 11 of Title 24, also called CALGreen.

Solid Waste Reduction Efforts. In 2011, the City adopted an ordinance to promote the recycling of construction and demolition debris to meet the City’s obligations under CALGreen and AB 939, which specifically requires the diversion of 65 percent of construction waste generated. As such, during construction activities, the Proposed Project would ensure implementation of applicable California Department of Resources, Recycling, and Recovery (CalRecycle) Sustainable (Green) Building Program Measures by recycling and/or reusing at least 65 percent of construction materials (including but not limited to soil, mulch, vegetation, concrete, lumber, metal, and cardboard). In addition, the Proposed Project would also comply with SMC 9.02 Solid Waste Management requirements, AB 1826, AB 341, and the City’s Trash Enclosure Standards regarding operational solid waste.

Water Conservation. The Proposed Project would comply with the Santee Water Efficient Landscape Ordinance, which promotes water conservation and efficiency by imposing various requirements related to evapotranspiration rates, irrigation efficiency, and plant factors.

Consistency with SB 32 Scoping Plan

California Senate Bill (SB) 375 requires integration of planning processes for transportation, land-use, and housing. Under the bill, each Metropolitan Planning

Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet the target provided in the SB 32 Scoping Plan, created by CARB, for reducing GHG emissions. SB 375 requires SANDAG to direct the development of the SCS for the region. The Proposed Project would be generally consistent with SB 32's 2022 Scoping Plan by complying with Title 24 Building Energy Efficiency Standards, including Part 11 of Title 24, also known as CALGreen, which includes incorporating design measures to reduce energy consumption, including, but not limited to, installing efficient lighting fixtures, and landscape irrigation design standards consistent with the City's Water Efficient Landscape Ordinance. Further as an infill development the Project would recycle a commercial land use that is on a developed lot that is already adequately served by existing infrastructure. As such, the Project would minimize the development footprint within the City and would avoid unnecessary infrastructure improvements as compared to developing the same use on a vacant undeveloped site that would require an extension of public utilities. Therefore, the Proposed Project's generation of GHG emissions would not conflict with any applicable plan, policy, or regulation for the purposes of reducing emissions of greenhouse gases.

Consistency with Sustainable Santee Action Plan

The City of Santee is committed to providing a more livable, equitable, and economically vibrant community through the incorporation of energy efficiency features and reduction of greenhouse gas emissions. Through the Sustainable Santee Action Plan, the City has established goals and policies that incorporate environmental responsibility into its daily management of its community and municipal operations.²⁶ The Sustainable Santee Action Plan proposes the following Project-applicable goals to help meet the designated reduction targets:

- Increase energy efficiency in new commercial units;
- Decrease energy demand through reducing urban heat island effect;
- Improve traffic flow.

The Proposed Project will comply with the mandatory measures consistent with 2022 Title 24 Building Energy Efficiency Standards. The Proposed Project would also provide ornamental landscaping along the periphery of the Project Site and along the vacuum stations, which would include trees, shrubs, and grass that would help reduce urban heat islands. The Proposed Project would be designed to include three queue lanes on-site prior to entering the car wash tunnel in order to reduce spillover traffic onto the surrounding roadways and improving traffic flow. Thus, the Proposed Project would be

²⁶ *City of Santee, Sustainable Santee Action Plan, December 2019, <https://www.cityofsanteeca.gov/home/showdocument?id=18422>, accessed January 2023.*

consistent with the applicable goals of the Sustainable Santee Action Plan.

As demonstrated above, the Proposed Project's compliance with mandatory regulatory measures, would be consistent with local and statewide goals and policies aimed at reducing the generation of GHG emissions, including SB 32 (which includes CARB's 2022 Scoping Plan). Therefore, the Proposed Project's generation of GHG emissions would not conflict with any applicable plan, policy, or regulation for the purposes of reducing emissions of GHGs and would also not create a cumulatively considerable increase in GHG emissions.

Water Quality

The Project Site is currently developed with an RV automobile dealership, which includes an office building and associated surface parking. Surface runoff leaving the Project Site is directed towards Rockvill Street and Magnolia Avenue, both of which contain storm drain inlets adjacent to the Project Site. The Proposed Project would continue to generate surface water runoff similar to existing conditions, and stormwater would be directed towards existing stormwater infrastructure currently serving the Project Site.

The Project Site is over one acre and therefore a Storm Water Pollution Prevention Plan (SWPPP) is required by the National Pollutant Discharge Elimination System (NPDES) Construction General Permit to be prepared and implemented. Through Best Management Practices (BMPs), the SWPPP would address erosion and sediment controls, pollution prevention standards, and requirements for inspections and corrective actions to reduce the effects of erosion and the potential for sedimentation and other pollutants entering the stormwater drainage system. Implementation of the BMPs identified in the SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality during construction. Additionally, ditch channels will prevent contaminated soapy water from entering the catch basin and storm drain system. Rinse and blow dry cycles will remove most contaminants prior to exiting the car wash tunnel, any remaining water will drain to the new stormwater inlet location for the exit lane which is now placed in landscape area adjacent the exit lane, water will be directed to flow through curb opening and through landscape prior to being collected by a catch basin and ultimately treated within the stormwater basin. In accordance with City policy, the Applicant shall also provide and submit a drainage study prepared by a registered Civil Engineer and which shall be designed to adequately convey stormwater runoff without damage or flooding of the surrounding properties or degradation of water quality. Additionally, as stated in SMC Section 9.06.250 Best Management Practices for New Development and Redevelopment, the Proposed Project would be required to be designed, constructed, and maintained to employ operational BMPs, consistent with the

BMP Design Manual, including Low Impact Development (LID) design techniques, as outlined in the County of San Diego’s LID Handbook, that intercept, store, infiltrate, evaporate, or evapotranspire on-site the pollutants contained in a volume of stormwater runoff produced from a 24-hour, 85th percentile storm event. Prior to the issuance of a building permit for any new development or significant redevelopment, the Applicant must prepare and submit project plans, including a Stormwater Quality Management Plan, BMP Plan Sheet, pollution control plan, and any other required plans to the City to demonstrate compliance. Prior to the issuance of a building permit, the Applicant shall also provide and submit for approval to the City a Stormwater Facilities Maintenance Agreement to be implemented throughout the life of the Proposed Project. Thus, Proposed Project compliance would ensure that the Proposed Project would not adversely affect water quality or significantly contribute to site runoff during the construction and operation of the Proposed Project. Therefore, the Proposed Project would result in less than significant impacts to the existing stormwater infrastructure serving the Project Site.

As such, and as discussed in the preceding paragraphs, the Proposed Project would therefore be consistent with Criterion Section 15332(d).

Criterion Section 15332(e): Utilities and Public Services

Yes **No** The site can be adequately served by all required utilities and public services.

Utilities

Water

The Project Site is located within the jurisdiction of the Padre Dam Municipal Water District (MWD). The MWD is divided into two major geographic service areas: the Western Service Area and Eastern Service Area. The Western Service Area encompasses the City of Santee, a small portion of El Cajon, and a small portion of the unincorporated County community of Lakeside. Within the Western Service Area, the MWD provides potable water service, wastewater collection and treatment, recycled water production and delivery, and parking and recreation services.

According to the MWD’s 2020 Urban Water Management Plan (2020 UWMP), in 2020 the average annual population within the entire water service area population was estimated to be 92,434 people, according to the San Diego Association of Governments (SANDAG). The total water demand for 2020 was approximately 9,558 AFY, with a per capita water demand of around 93 gallons per day. By 2045, the population is anticipated to increase to 117,701 based on SANDAG’s 2050 Regional Growth Forecast, with potable water demands under normal conditions anticipated to increase to 15,944 AFY by 2045. Supply availability was reviewed under a single-dry year and

five-consecutive-year drought. Based on the methodology used by the San Diego County Water Authority (SDCWA), projected supplies are anticipated to meet demands under both hydrologic scenarios. The MWD's successful implementation of conservation programs and local supply projects has assisted with providing supply reliability within the region.

As previously established, the Proposed Project would be consistent with the underlying land use and zoning regulations of the Project Site. New development that is consistent with the City's General Plan land use designation and zoning code is considered accounted for in the growth projections of SANDAG's 2050 Regional Growth Forecast. As the MWD's 2020 UWMP estimated projections of water demand are based on regional growth forecasts from SANDAG to calculate regional water demands for the SDCWA's service area, such as SANDAG's 2020 Regional Growth Forecast, the Proposed Project would be consistent with the present and future water demands established in the MWD's 2020 UWMP. This is further confirmed by the MWD's response letter dated September 16, 2022, which shows that the water infrastructure serving the Project Site would be reasonably expected to serve the Proposed Project car wash land use.²⁷ In accordance with this response letter, the Applicant shall submit landscape plans to the MWD for review and approval. The Proposed Project would also comply with the Santee Water Efficient Landscape Ordinance, which promotes water conservation and efficiency by imposing various requirements related to evapotranspiration rates, irrigation efficiency, and plant factors. Compliance with Title 24 and the City's Landscape Ordinance would further reduce the Proposed Project's operational water demands. Because the Proposed Project is consistent with the zoning and General Plan land use designations, the Proposed Project's increased water demand has already been accounted for in the 2020 UWMP. Further, the MWD confirmed through their response letter that existing water infrastructure would be reasonably expected to be able to serve the Proposed Project. Thus, impacts on water infrastructure capacity would be less than significant.

Wastewater

Within the Western Service Area the Padre Dam MWD provides wastewater collection and treatment services to the City of Santee. The MWD's sewer service area serves a population of approximately 72,600 as of 2020. According to the 2020 UWMP, the MWD contributed approximately 5,041 AFY of wastewater flow into the treatment plants that service the area. The Padre Dam MWD's has reviewed the Project and has confirmed that adequate wastewater infrastructure serving the Project Site is reasonably expected to be available serve the Proposed Project car wash land use within the next 5 years based on the capital facility plans of the district.²⁸ Therefore, the Proposed Project would be adequately served by wastewater service systems and impacts on wastewater

²⁷ See Attachment 7 to this Categorical Exemption.

²⁸ See Attachment 7 to this Categorical Exemption.

infrastructure capacity would be less than significant.

Solid Waste

Commercial and residential trash hauling, as well as industrial solid waste and recycling collection and disposal services for the City, are provided by Waste Management Inc. under an exclusive franchise agreement.²⁹ Currently, most of the waste collected in the City of Santee is disposed of at the Sycamore Landfill, located approximately 5.4 miles (driving distance) northwest of the Project Site. According to the June 2022 San Diego County Five-Year Review Report on landfill capacity, the Sycamore Landfill is estimated to undergo three expansions to its daily permitted capacity, which is expected to increase to 7,000 tons per day by 2025, increase to 9,000 tons per day by 2027, and increase again to 11,000 tons per day by 2030, the projected final expansion.³⁰

The Proposed Project is consistent with the underlying land use and zoning regulations of the Project Site. New development that is consistent with the City's General Plan land use designation and zoning code is considered accounted for in the growth projections of the Countywide Integrated Waste Management Plan and already accounted for in estimating the future regional and local solid waste needs for the county of San Diego. As such, the Proposed Project would be consistent with the Countywide Integrated Waste Management Plan projections and would have a less than significant impact on solid waste infrastructure.

In addition, the Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. As such, under the requirements of AB 939 and codified in SMC Chapter 9.04, Construction and Demolition Debris Recycling, the Proposed Project would comply with the requirements to divert a minimum of 65 percent of construction and demolition debris. In addition, the Applicant would comply with SMC Chapter 9.04 regarding the submittal of both a Construction and Demolition Debris Management Plan and a Construction and Demolition Debris Recycling Report, the former of which would identify all waste materials expected to be generated as a result of the Proposed Project at the time of demolition or building permit application, and the latter of which would show how construction and demolition debris generated by construction of the Proposed Project was diverted at established rates. The Proposed Project would also be required to comply with SMC Chapter 9.02 Solid Waste Management, AB 1826, AB 341, and the City's Trash Enclosure Standards regarding operational solid waste. Adherence to these regulatory compliance measures required by law, statute, or regulation would ensure that both construction and

²⁹ *City of Santee, Solid Waste & Recycling Services, Reduce, Reuse & Recycle Webpage, <https://www.cityofsanteeca.gov/services/solid-waste-recycling-services>, accessed January 2023.*

³⁰ *County of San Diego, Department of Public Works, Five-Year Review Report for the Countywide Integrated Waste Management Plan for the County of San Diego, September 28, 2022, https://www.sandiegocounty.gov/content/dam/sdc/dpw/SOLID_WASTE_PLANNING_and_RECYCLING/Files/2022%20Five-Year%20Review.pdf, accessed January 2023.*

operational solid waste generated by the Proposed Project would have a less than significant impact on solid waste infrastructure.

Public Services

Fire Services

The Santee Fire Department provides the City with fire and life safety education, inspection and prevention services, code enforcement, and by preparing for, responding to, and recovering from emergencies.³¹ The Santee Fire Department provides fire protection and paramedic services to the City, as well as roughly two square miles adjacent to Santee in the Pepper Drive area of the County. The Santee Fire Department maintains a minimum daily staffing of 16 emergency response personnel including the on-call Duty Chief. The City currently has two fire stations. The closest station is Fire Station No. 4, at 9130 Carlton Oaks Drive, located approximately 0.47-mile northwest of the Project Site.³² The Department's response times vary within the City, with the current goal being to provide an average maximum initial response time of no more than six minutes and no more than ten minutes for supporting paramedic transport units 90 percent of the time.³³

Regarding requirements for new development, the City utilizes and enforces the 2022 California Fire Code, also known as Part 9 of the Title 24 California Code of Regulations. The Proposed Project would conform to applicable requirements and amendments of the 2022 California Fire Code regarding construction and operational activities. To address fire and life safety issues on new development, the City's Fire Marshal reviews all proposed residential, commercial, and industrial projects through the City's Conditional Use Permit process. As such the Conditional Use Permit process would ensure that adequate fire hydrant locations, water flow pressures, access to emergency vehicles, and other requirements would be met on the Project Site. In addition, adherence to the 2022 California Fire Code would ensure that the Proposed Project's construction and operational impacts to existing fire services and infrastructure would be less than significant.

³¹ *City of Santee, General Plan Safety Element Webpage, <https://www.cityofsanteeca.gov/home/showpublisheddocument/7205/636336570205470000>, accessed January 2023.*

³² *City of Santee, Fire and Life Services, Emergency Operations & Emergency Medical Services Webpage, <https://www.cityofsanteeca.gov/government/fire-department/emergency-operations-emergency-medical-services>, accessed January 2023.*

³³ *City of Santee, General Plan Safety Element Webpage, <https://www.cityofsanteeca.gov/home/showpublisheddocument/7205/636336570205470000>, accessed January 2023..*

Police Services

The Santee Sheriff's Station serves as the City's police department and provides law enforcement services, including patrol, traffic, investigations, parking enforcement, emergency services, crime prevention programs, crime analysis, and narcotics enforcement to the City of Santee and the unincorporated communities of Lakeside and El Cajon. The Santee Sheriff's Station is located at 8811 Cuyamaca Street, approximately 1.7 miles (driving distance) west of the Project Site. According to the City's General Plan Safety Element, the ratio of officers to population is 1.42:12,000, which is higher than the county average, and the average priority call response time is 7.5 minutes. The City has one of the lowest crime rates in the County, but to help reduce the crime rate, the Sheriff's Department utilizes Crime Prevention Through Environmental Design (CPTED).³⁴ This program emphasizes the application of preventative measures in new construction as well as existing buildings or locations. CPTED provides recommendations on the location and design of common areas and walking paths, lighting, fencing, and landscaping, among other features. The Sheriff's Department reviews all new development proposals as part of the City Development Review Committee to incorporate safety recommendations and CPTED principles into the design of new projects. Therefore, the Proposed Project would be designed and reviewed to maximize on-site safety and would not conflict with the Sheriff Department's policies and procedures to reduce crime rates in the City. As such, the Proposed Project would have a less than significant impact on police services.

³⁴ *City of Santee, General Plan Safety Element*,
<https://www.cityofsantee.ca.gov/home/showpublisheddocument/7205/636336570205470000>,
accessed January 2023.

V. EXCEPTIONS TO CATEGORICAL EXEMPTIONS

Under the Class 32 Categorical Exemption Overview, even if a project is ordinarily exempt under any of the potential categorical exemptions, CEQA Guidelines Section 15300.2 provides specific instances where exceptions to otherwise applicable exemptions apply. The following section addresses whether any of the exceptions to the CEQA exemption apply to the project, consistent with CEQA Guidelines Section 15300.2.

Criterion 15300.2(a): Location

Yes No



Is there an exception to the exemption for the project due to its location in a particularly sensitive environment, such that the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies?

This exception applies only to CEQA exemptions under Classes 3, 4, 5, 6 or 11. Since the project qualifies as a Class 32 urban infill exemption, this criterion does not apply to the Proposed Project. There are no environmental resources of hazardous or critical concern that are designated, precisely mapped or officially adopted in the vicinity of the Project Site, or that could be adversely affected by the Proposed Project. Therefore, the exception under CEQA Guidelines Section 15300.2(a) does not apply.

Criterion 15300.2(b): Cumulative Impact

Yes No



Is there an exception to the exemption for the project due to significant cumulative impacts of successive projects of the same type and in the same place, over time?

As demonstrated in the analyses above, the Proposed Project would not result in any significant traffic, noise, air quality, or water quality impacts. The Proposed Project is consistent with the development density allowed under the General Plan and zoning for the site. Any successive projects of the same type and nature would reflect a development that would be consistent with the underlying land use designation and zoning and thus would be subject to the same regulations and requirements, including development standards and environmental impacts. The impacts of each subsequent related project would be mitigated, if necessary, and thus would not result in a cumulative impact. Therefore, the Proposed Project, when viewed in conjunction with other proposed, approved, or reasonably anticipated projects, would not generate impacts that are cumulatively considerable. Thus, the potential for the Proposed Project to result in cumulative impacts is less than significant. Therefore, the exception under CEQA Guidelines Section 15300.2(b) does not apply to the Proposed Project.

Criterion 15300.2(c): Significant Effect Due to Unusual Circumstances

Yes No

- Is there an exception to the exemption for the project because there is a reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances?

There are no unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions. The Project Site is located in an urbanized area and is consistent with the existing physical arrangement of the properties within the vicinity of the Project Site. The Proposed Project would maintain its existing zoning and General Plan land use designation of IL/GC and Light Industrial Overlay, respectively. Thus, the Proposed Project would be consistent with respect to allowable uses and density permitted on the Project Site. As such, there are no unique or unusual circumstances that exist in connection with the Proposed Project or surrounding environmental conditions that have the potential to result in a significant environmental impact upon the environment.

Criterion 15300.2(d): Scenic Highway

Yes No

- Is there an exception to the exemption for the project because project may result in damage to scenic resources including but not limited to, trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway?

The Project Site is developed with an RV automobile dealership. There are no rock outcroppings or unique geologic features on the Project Site. Magnolia Avenue is classified as a Prime Arterial in the City's Mobility Plan. Rockvill Street is classified as a Collector Industrial Street in the City's Mobility Plan. However, neither of these roads are designated as scenic highways. The nearest officially designated scenic highway is the SR 52 from approximately Santo Road to Mast Boulevard, located 3.7 miles west of the Project Site.³⁵ The SR 52 from approximately Mast Boulevard to the SR 67 is considered eligible but has not been officially designated as a scenic highway, the closest portion of which is located approximately 1,600 feet south of the Project Site. In addition, the Project Site does not contain any locally protected tree species. There are no historic buildings located on the Project Site. Based on the City's Conservation Element of the General Plan, the closest historic resource is the Edgemoor Polo Barn, located approximately 0.6-mile northwest of the Project Site.³⁶ The Edgemoor Polo Barn would not be demolished, destroyed, altered, or relocated as a result of the Proposed Project. The Proposed Project would have no impact on this historic resource, as the

³⁵ *California Department of Transportation (Caltrans), State Scenic Highway System Map, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed January 2023.*

³⁶ *United States National Park Service, National Park Gallery Digital Asset Management System, <https://npgallery.nps.gov/AssetDetail/NRIS/85001065>, accessed January 2023.*

Proposed Project does not abut this resource and would not result in a substantial adverse change to the degree that it would no longer be eligible for listing under national, state, or local landmark resources. Therefore, the Proposed Project would not result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings or similar resources within a state scenic highway. Thus, an exception to the exemption under CEQA Guidelines Section 15300.2(d) does not apply to the Proposed Project.

Criterion 15300.2(e): Hazardous Waste Sites

Yes No

- Is there an exception to the exemption for the project because the project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code?

The provisions of Government Code Section 65962.5 are commonly referred to as the "Cortese List." The provisions require the Department of Toxic Substance Control (DTSC), the State Water Resources Control Board, the California Department of Public Health, and the California Department of Resources Recycling and Recovery (CalRecycle) to submit information pertaining to sites associated with solid waste disposal, hazardous waste disposal, leaking underground tank sites, and/or hazardous materials releases to the Secretary of California Environmental Protection Agency (Cal/EPA).

The Project site is not identified on any lists compiled pursuant to Section 65962.5 of the Government Code.³⁷ Therefore, an exception to the exemption under CEQA Guidelines Section 15300.2(e) related to hazardous materials sites does not apply to the Proposed Project.

Criterion 15300.2(f): Historical Resources

Yes No

- Is there an exception to the exemption for the project because the project may cause a substantial adverse change in the significance of a historical resource?

A substantial adverse change in the significance of a historic resource means the demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The Project Site consists of an RV automobile dealership and associated surface parking. There are no historic buildings located on the Project Site. The closest historic resource is the Edgemoor Polo Barn, located approximately 0.6-mile northwest

³⁷ California Department of Toxic Substances Control, *EnviroStor Webpage*, <https://www.envirostor.dtsc.ca.gov/public/>, accessed January 2023.

of the Project Site.³⁸ The Project Site does not abut this property; further, construction and operation of the Proposed Project would not directly demolish, relocate, or significantly modify this designated historic resource or its surroundings such that its significance would be materially impaired. Therefore, an exception to the exemption under CEQA Guidelines Section 15300.2(f) does not apply to the Proposed Project.

³⁸ *United States National Park Service, National Park Gallery Digital Asset Management System, <https://npgallery.nps.gov/AssetDetail/NRIS/85001065>, accessed January 2023.*

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ATTACHMENTS

Attachment 1 – California Department of Toxic Substances Control

Attachment 2 – Noise Impact Study

Attachment 3 – Traffic Impact Statement

Attachment 4 – Air Quality Modeling Worksheets

Attachment 5 – Greenhouse Gas Emissions Worksheets

Attachment 6 – U.S. Fish and Wildlife Service Resource List

Attachment 7 – Service Request Letters

Attachment 8 – Biological Survey

Attachment 9 – Parking Demand Analysis

<https://www.cityofsanteeca.gov/government/planning-and-building/active-projects-and-environmental-documents-for-public-review>