

Appendix A. NOP and NOP Comments Received

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CITY OF SANTEE

MAYOR
John W. Minto

CITY COUNCIL
Ronn Hall
Stephen Houlahan
Brian W. Jones
Rob McNelis

Notice of Preparation of a Draft Revised Environmental Impact Report

TO: Agencies, Organizations, and Interested Parties

SUBJECT: Notice of Preparation (NOP) of a Draft Revised Environmental Impact Report for the Fanita Ranch Project (SCH# 2005061118)

The City of Santee (City) is the lead agency, in accordance with the California Environmental Quality Act (CEQA), in the preparation of a Draft Revised Environmental Impact Report (EIR) for the Fanita Ranch project. The Fanita Ranch project is considered a project under CEQA (Guidelines Section 15378), and the City has discretionary authority over the project (CEQA Guidelines Section 15357).

Agencies: The City requests the view of your agency as to the scope and content of the environmental analysis relevant to your agency's statutory responsibilities and interests in connection with the proposed project. Your agency may need to use the EIR prepared by the City when considering any required permits issued by your agency or when authorizing other approvals related to the project.

Organizations and Interested Parties: The City requests any comments related to environmental concerns associated with this project.

Deadline: CEQA requires a 30-day scoping period. The public review period on the NOP is scheduled to begin on November 10, 2018 and close on December 10, 2018. Because of the time limits mandated by State law, your response must be received by this deadline. Please indicate a contact person and send your response to:

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov
(619) 258-4100, Ext. 182

A public scoping meeting will be held on Thursday, November 29, 2018 at City of Santee City Hall, 10601 Magnolia Avenue, Building 8 from 5:30 PM to 7:30 PM. All parties are welcome to attend and are encouraged to recommend environmental issues, mitigation measures, and alternatives to the project that they believe should be addressed in the Draft Revised EIR.

Project Title: Fanita Ranch

Project Location: The Fanita Ranch project site consists of approximately 2,635 acres of land located in the northern portion of the City of Santee (City) in eastern San Diego County. The City is located approximately 18 miles east of downtown San Diego and the Pacific Ocean. The proposed project lies north of State Route (SR) 52 and west of SR-67 and would be accessed from the future northerly extensions of Fanita Parkway and Cuyamaca Street via Mast Boulevard and the future extension of Magnolia Avenue to Cuyamaca Street. The project site is bordered by Marine Corps Air Station Miramar and Padre Dam Municipal Water District (PDMWD) facilities to the west including Santee Lakes Recreation Preserve; open space/recreational areas including Goodan Ranch Regional Park and Sycamore Canyon Open Space Preserve to the north and west; City residential neighborhoods to the south and the unincorporated residential community of Eucalyptus Hills to the east. Figure 1 provides the Regional Location Map and Figure 2 provides the Project Site Location Map.

Project Approval History: The Fanita Ranch project site has been subject to environmental review and land use planning for the past 40 years. Prior to the current project, the most recent application for development on the project site was filed in 2005. At that time, a Tentative Map and Development Review Permit application were submitted to build four villages containing 1,380 single-family dwelling units, 15 live-work units, commercial and mixed use space, parks, and open space. The City Council certified the Final EIR (SCH# 2005061118) and approved the project in 2007.

From 2008 through 2012, the approvals were subject to litigation. Ultimately, portions of the 2007 EIR related to biological resources and water supply, as well as a Revised EIR on the single issue of fire safety adopted by the City in 2009, were found inadequate. (See *Preserve Wild Santee, et al. v. City of Santee, et al.* (2012) 210 Cal.App.4th 260; *Preserve Wild Santee, et al. v. City of Santee, et al.*, San Diego Superior Court Case No. 37-2009-00097042-CU-TT-CTL.) In 2013, the City set aside the certification of the 2007 EIR and 2009 Revised EIR and vacated related project approvals.

In August 2018, the current owner of the property, HomeFed Fanita Rancho, LLC and JWO Land, LLC, a wholly owned subsidiary of HomeFed Fanita Rancho, LLC, submitted a complete application that modifies the project. This Notice of Preparation is for a revised EIR evaluating the modified project and addressing the portions of the prior environmental analysis for the project approved in 2007 that were found inadequate.

Revised Project Description: Fanita Ranch would be a master planned community consisting of up to 2,949 housing units with a school, or 3,008 units without a school, up to 80,000 square feet of commercial uses, parks, open space, and agriculture uses. The Santee General Plan identifies Fanita Ranch as Planned Development (PD). A General Plan Amendment would be processed concurrently with a Specific Plan to designate the Fanita Ranch project site with a Specific Plan (SP) land use designation and to ensure that the Fanita Ranch project is in compliance with the City's General Plan, as amended.

Development within the Fanita Ranch Specific Plan Area would be clustered, preserving more than 60 percent of the site as Habitat Preserve (see Figure 3, Land Use Plan). Development would be distributed into three villages named according to their design theme: Fanita Commons, Orchard Village, and Vineyard Village. Each village would be defined by its location, unique physical characteristics, and mix of housing types and uses. In addition, the application identifies a Special Use Area located in the southwest corner of the site. Each of the development areas and key project components are summarized below.

Fanita Commons

Fanita Commons would be located in the northwest portion of the site and would serve as the main common village for all of Fanita Ranch. It would include an active-adult neighborhood, K-8 school site, a community park, two natural drainages preserved as open space with adjoining linear parks, a working Farm, and a mixed-use village center. With the Farm as its focal point, orchards, vineyards, fields, and an event barn would serve as defining elements of this village. The mixed-use village center would allow for commercial, residential, recreational, and civic uses, including a fire station site, and a congregate care facility. The 19-acre school and joint use area would accommodate up to 1,000 students. If the Santee School District does not acquire the property, the underlying medium density residential (MDR) land use designation may be implemented. In that case, the maximum total number of units permitted in the Specific Plan Area would increase by 59 units to a total of 3,008 units.

Orchard Village

Located directly south of Fanita Commons, Orchard Village would consist of low and medium density residential housing types, neighborhood and mini-parks, and a centrally located Village Center. Orchard Village would be geographically and topographically separated from Fanita Commons by Open Space and a linear riparian area, but would be physically connected by roadways, trails, and a pedestrian bridge. This smaller, mixed-use village center would include neighborhood serving retail, office, and commercial uses. The Farm would border Orchard Village to the northeast.

Vineyard Village

Vineyard Village, located in the northeastern portion of the project site, would be the largest of the three proposed villages. Vineyard Village would be separated from the other two villages by a Habitat Preserve corridor, but would be connected to the other villages by two access roads. In addition to vineyards, this village would contain multi-family and single-family residential housing types, a neighborhood-serving village center providing retail, office uses, and neighborhood and mini-parks.

Habitat Preserve

More than half of the project area (approximately 60 percent or approximately 1,600 acres) would be preserved as permanent native habitat. The bulk of the preserve area, approximately 900 acres, would be located in the southern portion of the site. An approximately 35-acre trail system through the Habitat Preserve would be designed to provide public access, where appropriate. Open Space within the Habitat Preserve would be dedicated to the Multiple Species Conservation Program (MSCP) Subarea Plan Preserve currently being prepared by the City for long-term preservation and management. A Habitat Management Plan (HMP) would be adopted for the Habitat Preserve to direct the long-term management of biological resources and meet the requirements of the Subarea Plan.

The Farm

The Farm would be the community focal point of Fanita Ranch. The approximately 27-acre Farm would be located along the eastern border of Fanita Commons and Orchard Villages, near the center of the proposed development. The Farm would include an iconic event barn that would set the architectural theme of the community and provide a venue for special events and farming operations. The working Farm would also include terraced vegetable fields, pasture lands, limited housing for employees, raised gardens, and limited animal keeping. A Community Supported Agriculture (CSA) program, where the consumer receives produce from the Farm on a regular basis, would also be proposed. Food grown on the Farm may also be distributed to local schools, restaurants, and other institutional facilities such as the congregate care and assisted living facilities.

Open Space

Outside of the Habitat Preserve, the Fanita Ranch project would contain approximately 228 acres of Open Space maintained and managed by the Homeowners Association. This would include brush management areas at the edge of the development, slopes adjacent to roads and within villages, detention basins, trailheads, and two riparian areas in Fanita Commons.

Special Use Area

An approximately 33-acre Special Use Area would be designated in the southerly portion of the project site. This site currently has restricted development potential due to geotechnical conditions. Potential uses could include a solar farm, recreational vehicle (RV) and boat storage, above ground agriculture, such as greenhouses, or other similar uses. The Special Use Area would take access off Carlton Hills Boulevard.

On-Site Mobility

The onsite roadway network for Fanita Ranch would be designed as a system of complete streets that support motorists, pedestrians, bicyclists, and transit riders. On-site streets would generally be two lanes and would include a variety of design elements including roundabouts, split streets, landscaped medians, and parkways. Roadways that pass through Open Space would be designed to minimize impacts to habitat and encourage safe wildlife crossings. Alternative modes of transportation would be encouraged by providing on-street bike lanes, off-street multi-purpose trails, bike stations, and shuttle stops. The pedestrian circulation system would include interconnected sidewalks, perimeter trails, nature trails, and pedestrian bridges. Figure 4 depicts the proposed Circulation Plan.

A Transportation Demand Management (TDM) Plan would be prepared and implemented to support alternative transportation modes, manage shared facilities to optimize modes, implement and support appropriate advanced technologies, and reduce greenhouse gas emissions.

Off-Site Improvements

The project would improve and construct new segments of three Mobility Element roads. Both Fanita Parkway and Cuyamaca Street would be improved from Mast Boulevard to their current northern limits. The extension of Fanita Parkway would be constructed north of Ganley Road, and the extension of Cuyamaca Street would be constructed north of Chaparral Drive. The project would also construct the extension of Magnolia Avenue from its current northerly terminus west to intersect with the extended Cuyamaca Street.

Parks, Trails and Recreational Facilities/Regional Connectivity

The Fanita Ranch project would provide a coordinated system of parks and non-motorized use trails that would connect to the three villages, regional trails, and open space. The trail system would connect to existing offsite trails in Sycamore Canyon Open Space Preserve, Goodan Ranch Regional Park, Mission Trails Regional Park, and Santee Lakes Recreation Preserve. Approximately 73 acres of parks would be provided throughout the project site. The Community Park in Fanita Commons would provide the main location for active recreational activities within Fanita Ranch. Neighborhood parks would be provided in key locations to define neighborhoods and provide gathering spaces. Mini-parks and linear parks would be distributed throughout the community to provide opportunities for recreation, activity, and relaxation within walking distance of all homes. Many of the mini-parks would serve as trailheads to the primitive trail system within Fanita Ranch. A series of trails and paths would connect the Farm to all of the villages within Fanita Ranch (see Figure 5, Parks and Trails Plan).

Fanita Ranch would provide a system of on-street and off-street trail facilities totaling approximately 35 miles that would accommodate and promote bicycle and pedestrian use as an alternative mode of transportation or for recreational purposes. Multi-purpose trails for walking, biking, and jogging would be provided adjacent to roadways but physically separated from motor vehicle traffic by a landscaped buffer. Village access trails would be concrete-paved paths that connect village urban centers to the community-wide trail system for transportation and recreational uses. Perimeter trails would be eight-foot wide native earth trails that loop around Vineyard Village and would be intended for recreational use. Village nature trails would connect Vineyard Village to Fanita Commons and the Farm. Native trails would be unpaved pathways that provide access from developed areas to existing primitive trails within the Habitat Preserve. The primitive trail system has been planned to accommodate recreational opportunities as well as to restore areas of native habitat.

Grading and Utilities

There would be approximately 27,000,000 cubic yards of cut and fill, which would be balanced onsite. The site would be graded into development pads using a maximum 2:1 slope ratio for fill slopes and a maximum 1.5:1 for cut slopes. Significant cut and fill slopes, when visible from the public rights-of-way, would utilize landform grading techniques where the proposed contours mimic natural contours to complement the natural surroundings. Blasting may be required in some geologic formations. Proposed development within the project site contemplates the use and reuse of onsite rock materials such as large boulders, rock cobble, decomposed granite, and processed rock. Aggregate plants used for rock crushing and production of aggregate materials would be located onsite during construction. Utilization of these onsite materials would eliminate the need for importing rough or finished materials thus reducing construction-related vehicle emissions in support of the Sustainable Santee Plan currently being prepared.

Stormwater would be collected using low impact development (LID) techniques and best management practices to treat stormwater near the source and ensure that runoff is clean prior to discharging into the natural watershed. The system would collect stormwater through a series of swales, catch basins, and culverts that direct storm water to water quality basins. This system would allow natural infiltration, evapotranspiration, and filtering of the stormwater to remove microscopic organisms, suspended solids, organic material, nitrogen, and phosphorous.

PDMWD would provide domestic water service through their Advanced Water Purification Program. The proposed water system would include two new storage reservoirs, and three pump stations. PDMWD may provide recycled water to Fanita Ranch for construction purposes on a limited and seasonal basis.

PDMWD would also provide sewer services for Fanita Ranch. A new gravity sewer system, consisting of 8-inch to 12-inch pipes, is proposed on-site to collect and convey wastewater to a 15-inch trunk sewer at the west edge of Orchard Village. Wastewater would then be conveyed to an influent lift station that would pump flow to the Padre Dam Water Recycling Facility.

San Diego Gas & Electric Company (SDGE) provides electricity and natural gas for San Diego County including Santee. These utilities would be extended into the project site from existing local distribution systems in the region.

Public Services

Fire protection services would be provided by the City of Santee Fire Department. The proposed project would designate a 1.5-acre site for a new City Fire Station which would be located in Fanita Commons. A Fire Protection Plan would be prepared to establish fire protection through a system of fire safety

features and design measures that have proven to perform well in wildland urban interface and high fire hazard severity zones. The system of fire protection would include redundant layering so that no single feature is relied upon for protection. An Evacuation Plan would also be prepared that focuses on resident awareness and preparedness and provides an evacuation route map along with various family evacuation preparation tools. In order to ensure fire safety during construction, a Construction Fire Prevention Plan would be prepared to provide basic direction for fire safety awareness during construction. The Construction Fire Prevention Plan would present standard protocols and approaches for reducing the potential of ignitions for typical construction site activities. These plans would be put in place to provide a multi-layer approach incorporating a variety of techniques including ignition-resistant materials, interior sprinklers, vegetation buffers, and multiple ingress/egress points for emergency traffic.

Police protection would be provided through the San Diego County Sheriff's Department through an existing contract with the City. The Village Center land use designation permits a law enforcement substation within Fanita Commons should it be desired.

Commercial and residential trash hauling, as well as industrial solid waste and recycling collection and disposal services would be provided by Waste Management, Inc. under a contractual franchise agreement with the City. The waste would be hauled to Sycamore Landfill, a 349-acre site located to the southwest of the project site off Mast Boulevard.

The 19-acre school site and adjoining joint use area in Fanita Commons is discussed above. The site is intended to accommodate a K-8 school for up to 1,000 students. High school students living in Fanita Ranch are anticipated to attend existing Santee schools in the Grossmont Union High School District.

Library services would be provided by the Santee Branch Library of San Diego County located on Carlton Hills Boulevard approximately one mile south of the project site.

Development Phasing

Construction is anticipated to occur in four phases over a 10 to 15 year period. Phases may overlap or vary depending upon market conditions and may be broken down into smaller sub-phases. Construction is anticipated to begin in 2021. The Special Use Area is not tied to the development phasing and may be developed anytime during project build-out.

Discretionary Actions Required: The following City discretionary actions are associated with the project and would be required for project approval:

- General Plan Amendment
- Zone Reclassification
- Specific Plan
- Development Agreement
- Environmental Impact Report Certification
- Tentative Subdivision Map(s)
- Grading Permit
- Development Review Permit(s)
- Conditional Use Permit
- Encroachment Permit(s)
- Vacations, as needed

Additionally, implementation of the project may require the applicant to obtain approval, permits, licenses, certifications, or other entitlements from various federal, state, and local agencies including but not limited to:

- U.S. Army Corps of Engineers: Section 404 – Clean Water Act
- U.S. Fish and Wildlife Service: Endangered Species Act – Section 7 Consultation or Section 10(a) Incidental Take Permit
- California Department of Fish and Wildlife: Fish and Game Code Section 1600 – Streambed Alteration Agreement/Memorandum of Understanding
- California State Water Resources Control Board: National Pollutant Discharge Elimination System Permit; General Construction Activity Storm Water Permit, including Storm Water Pollution Prevention Plan
- San Diego Regional Water Quality Control Board: Clean Water Act Section 401 Permit – Water Quality Certification

Preliminary Environmental Review: The following environmental topics would be evaluated in detail in the Draft Revised EIR, and mitigation measures would be identified as necessary to reduce potentially significant effects.


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

The following comprehensive technical studies and supporting documents would be prepared and included as appendices to the EIR:

- General Plan Compatibility Analysis
- Aggregate Crushing and Reuse Plan
- Air Quality Technical Report
- Biological Resources Technical Report
- Potential Critical Course Sediment Yield Area Analysis
- Cultural Resources Studies (Confidential - will not be appended to the EIR)
- Energy Analysis
- Wildland Fire Evacuation Plan
- Fire Protection Plan including Construction Fire Protection Plan
- Geotechnical Investigations
- Green Streets Priority Development Project Exempt Stormwater Quality Management Plan
- Greenhouse Gas Emissions Technical Report
- Noise Technical Report
- Paleontological Resources Report

- Parking Management Plan
- Phase I Environmental Site Assessment
- Priority Development Project Stormwater Quality Management Plan
- Preliminary Drainage Study
- Sewer Service Study
- Stormwater Infiltration Feasibility Study
- Traffic Impact Analysis
- Transportation Demand Management Plan
- Water Service Study
- Water Supply Assessment Report

For questions regarding this notice, please contact me at (858) 258-4100 ext. 182.



John O'Donnell
Principal Planner

11/5/2018
Date

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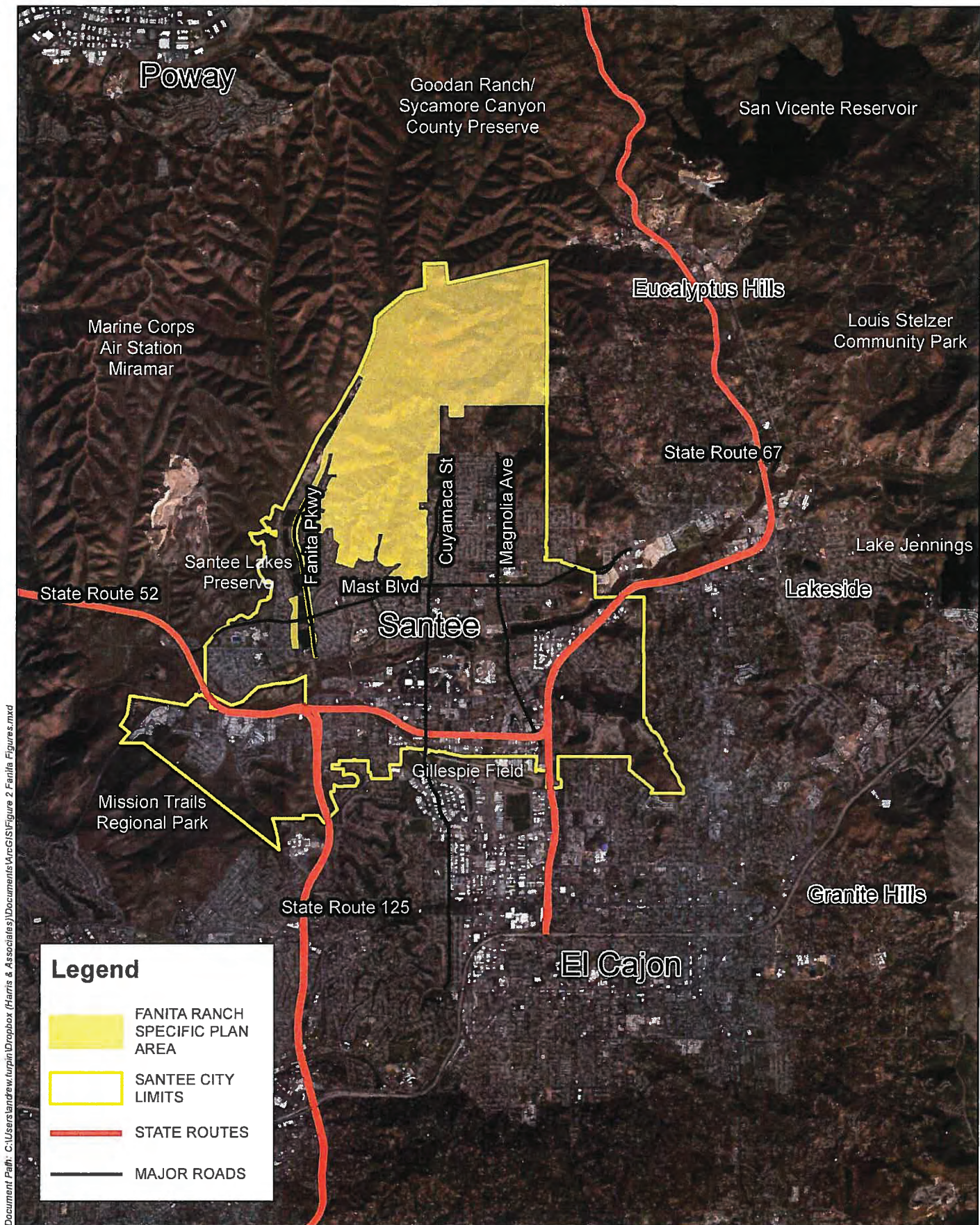
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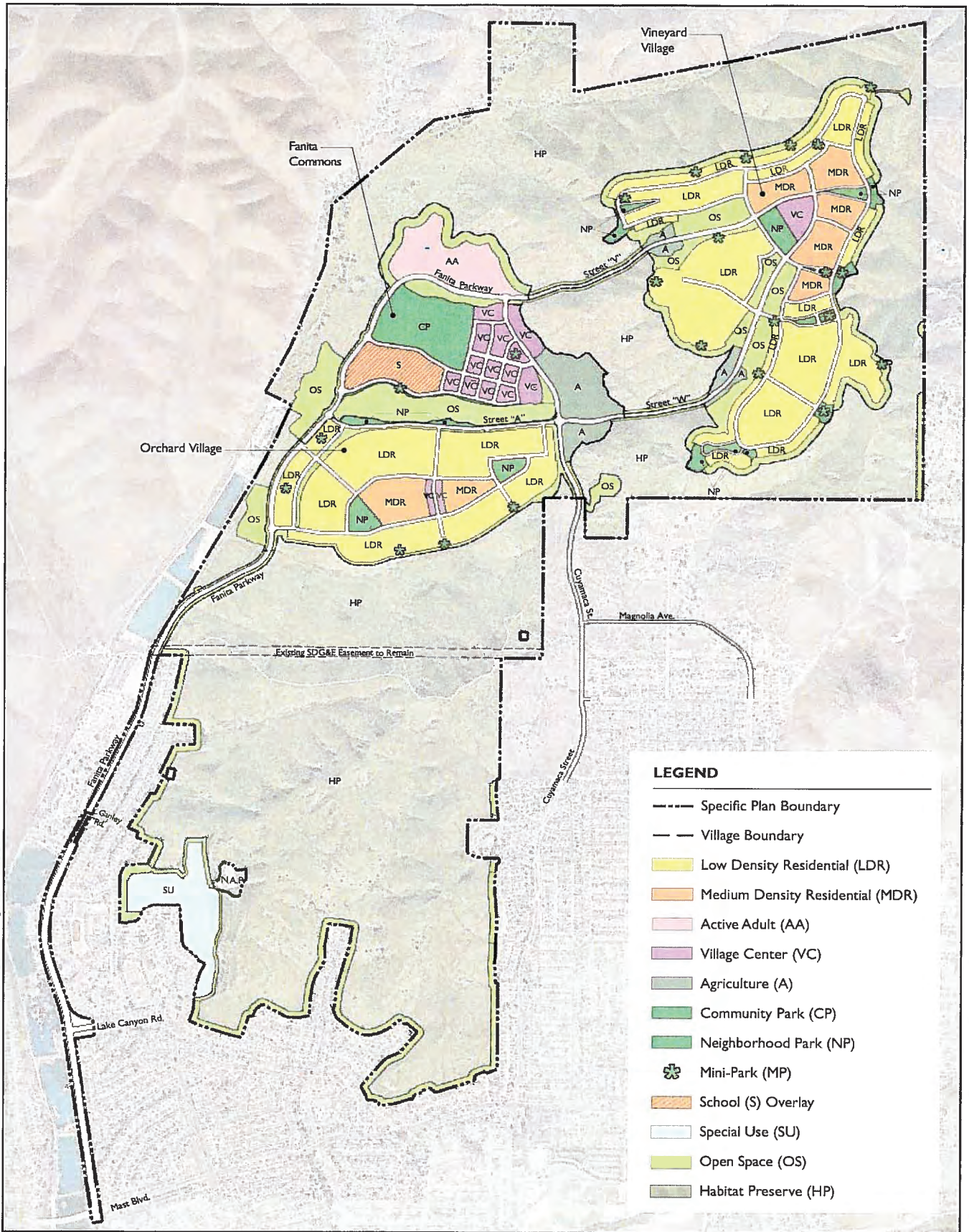
Figure 1
Regional Location Map



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LEGEND

- Specific Plan Boundary
- - - Village Boundary
- Low Density Residential (LDR)
- Medium Density Residential (MDR)
- Active Adult (AA)
- Village Center (VC)
- Agriculture (A)
- Community Park (CP)
- Neighborhood Park (NP)
- Mini-Park (MP)
- School (S) Overlay
- Special Use (SU)
- Open Space (OS)
- Habitat Preserve (HP)

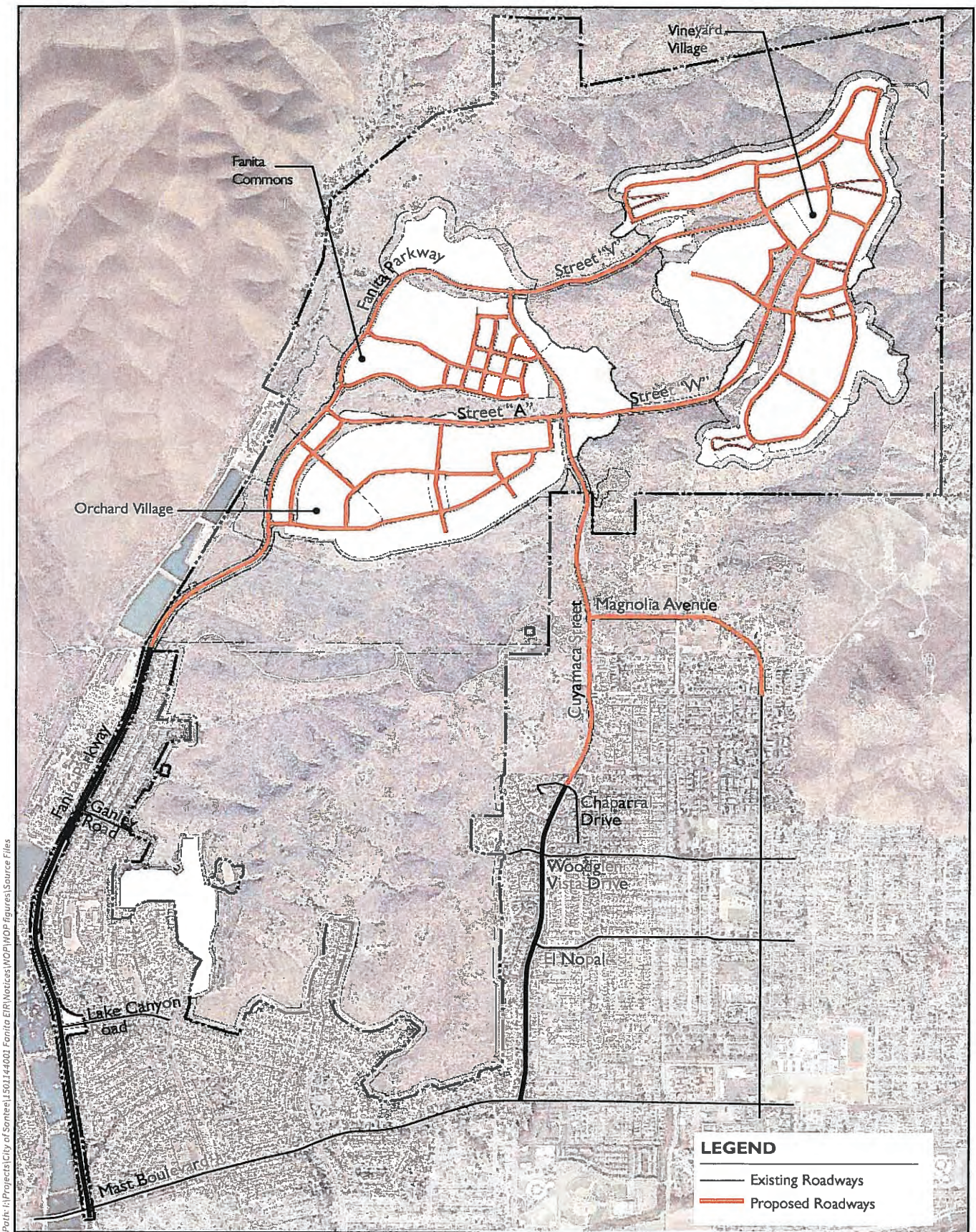
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Figure 3
Land Use Plan



Source: KTG Planning + Architecture



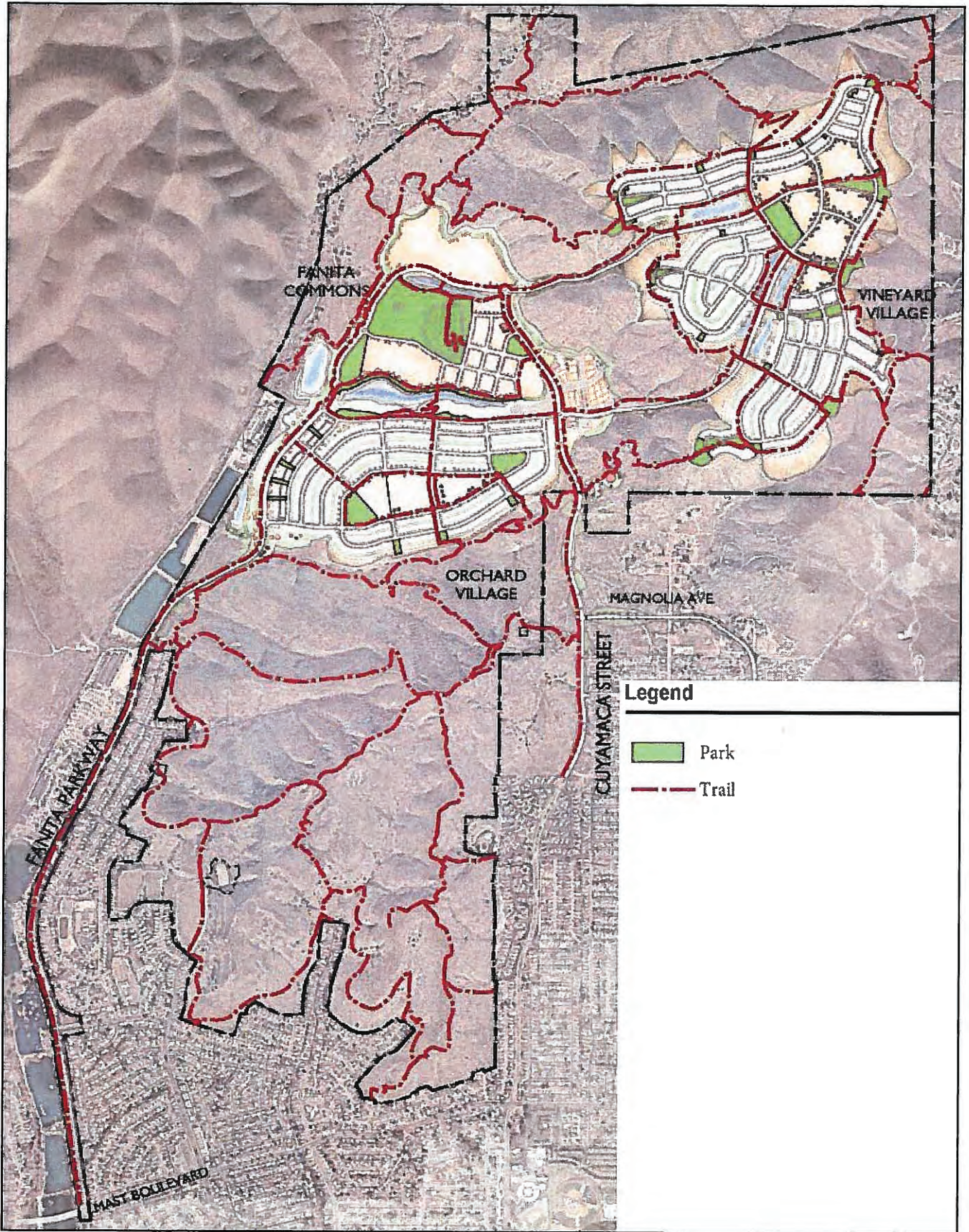
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Figure 4
Circulation Plan

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Source: KTG Planning + Architecture



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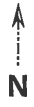


Figure 5
Parks and Trails Plan

NOP - Scoping Meeting Comment Letters Matrix

Committer	Location in EIR where comment is addressed
Federal	
US Fish and Wildlife Service	<p>Biological Resources EIR section</p> <p>Global throughout entire EIR, as applicable</p> <p>Planning Issue; Project Description</p> <p>Planning Issue; Biological Resources EIR section</p> <p>Planning Issue; Wildfire EIR section</p> <p>Biological Resources EIR section</p> <p>Project Description</p> <p>Biological Resources EIR section</p>
State	
Governor's Office of Planning and Research State Clearinghouse (Scott Morgan)	Comment does not require response in the EIR.
CA Department of Fish and Wildlife	<p>Planning Issue; Project Description</p> <p>Planning Issue; Biological Resources EIR section</p>

	Wildfire EIR section
	Biological Resources EIR section
	Project Description
	Biological Resources EIR section
	Biological Resources EIR section
	Biological Resources EIR section
	See above.
CA Department of Transportation District 11	Transportation EIR section; Traffic Study
Native American Heritage Commission (Katy Sanchez)	Cultural and Tribal Cultural Resources EIR section
Local	
City of San Diego (Alyssa Muto)	Biological Resources EIR section
	Not applicable to the EIR
	Project Description; Geology and Soils EIR section
	Hydrology and Water Quality EIR section
	Project Description
	Hydrology and Water Quality EIR section
	Recreation EIR section
	Transportation EIR section

	Alternative EIR section
	Transportation EIR section
	Throughout EIR, as appropriate
	Transportation EIR section
County of San Diego Department of Planning and Development Services (Eric Lardy)	Global throughout entire EIR, as applicable
	Transportation EIR section; Traffic Study
	Global change throughout entire EIR
	Biological Resources EIR section; Recreation section
	Recreation EIR section; Biological Resources EIR section
	Hazards and Hazardous Materials EIR section
	Hazards and Hazardous Materials EIR section; Biology EIR section
Padre Dam Municipal Water District (PDMWD) (Courtney Mael)	Project Description; Transportation EIR section

Utilities and Service Systems EIR section

Hazards and Hazardous Materials EIR section

Utilities and Service Systems EIR section

Utilities and Service Systems EIR section; Energy EIR section

Project Description; Utilities and Service Systems EIR section; Recreation EIR section

Transportation EIR section

	Planning Issue
	Hydrology and Water Quality EIR section
	Transportation EIR section
San Diego Association of Governments (SANDAG) (Seth Litchney)	Transportation EIR section, Project Description if making project features
San Diego County Regional Airport Authority (Ed Gowens)	Noise EIR section
Organizations	
Barona Band of Mission Indians (Art Bunce)	Cultural Resources Phase and Phase II reports; Cultural and Tribal Cultural Resources EIR section
California Native Plant Society, San Diego	Planning Issue; not applicable to the EIR
	Wildfire EIR section
	Planning Issue; not applicable to the EIR
	Biological Resources EIR section
	Alternatives EIR section
	Wildfire EIR section
	Public Services EIR section; Wildfire EIR section
	Public Services EIR section; Wildfire EIR section
	Greenhouse Gas Emissions EIR section
	Planning Issue; not applicable to the EIR
	Utilities and Service System EIR section
	Alternatives EIR section
	Transportation EIR section; Wildfire EIR section
	Alternatives EIR section
Preserve Wild Santee (Van Collinsworth)	Greenhouse Gas Emissions EIR section
	Public Services EIR section; Wildfire EIR section

	Geology and Soils EIR section
	Wildfire EIR section
	Hazards and Hazardous Materials EIR section
	Wildfire EIR section; Public Services EIR section
	Hydrology and Water Quality EIR section
	Biological Resources EIR section
	Alternatives EIR section
San Diego County Archeological Society	Cultural and Tribal Cultural Resources EIR section
Sierra Club San Diego, Conservation Committee	Wildfire EIR section
	Alternatives EIR section
	Alternatives EIR section
Southwest Regional Council of Carpenters (Nicholas Whipps)	CEQA attorney question
	Air Quality EIR section
	Greenhouse Gas Emissions EIR section
	Alternatives EIR section
	Geology and Soils EIR section; Hazards and Hazardous Materials EIR section; Wildfire section
	Public Services EIR section; Recreation EIR section; Utilities and Service Systems EIR section
Viejas Band of Kumeyaay Indians (Ray Teran)	Hydrology and Water Quality EIR section; Utilities and Service Systems EIR section
	Cultural and Tribal Cultural Resources EIR section
	Global throughout entire EIR, as applicable
	Cultural and Tribal Cultural Resources EIR section
Individuals	
Rob Aaronson	Project Description; Biological Resources EIR section; Land Use and Planning EIR section; Recreation EIR section
Anonymous	Project Description; Land Use and Planning EIR section; Recreation EIR section
William Apfelbaum	Transportation EIR section
Jenn Arindaque	Refer to Rob Aaronson letter above
Scott Armstrong	Refer to Rob Aaronson letter above
Hector Ayala	Refer to Rob Aaronson letter above

Janet Barnett	Planning issue; Transportation EIR section
	Planning issue; Transportation EIR section; Utilities section
	Transportation EIR section
	Project Description; Transportation EIR section
	Transportation EIR section
Matthew Bartelt	Refer to Rob Aaronson letter above
Kris Beecher	Refer to Rob Aaronson letter above
Frank Bennett	Planning Issue; Recreation EIR section
Jay Bernal	Refer to Rob Aaronson letter above
Bryan Boyd	Refer to Rob Aaronson letter above
Cinda Brown	Refer to Rob Aaronson letter above
Zach Bryan	Refer to Rob Aaronson letter above
Michael Candra	Refer to Rob Aaronson letter above
Dan Carter	Refer to Rob Aaronson letter above
Vince Carter	Refer to Rob Aaronson letter above
Ronnie Casas	Refer to Rob Aaronson letter above
Bill Caswell	Project Description; Recreation EIR section
Mary Chavez	Hazards and Hazardous Materials EIR section; Transportation EIR section; Public Services EIR section; Wildfire EIR section
Dan Chusid	Aesthetics EIR section
	Transportation EIR section
	Population and Housing EIR section; Public Services EIR section; Wildfire EIR section
David Comell	Project Description; Recreation EIR section
Tamara Cook	Refer to Rob Aaronson letter above
Tom Cook	Refer to Rob Aaronson letter above
Katherine Curtis	Greenhouse Gas Emissions EIR section
	Transportation EIR section
	Planning Issue; not applicable to EIR
	Biological Resources EIR section; Aesthetics EIR section; Recreation EIR section
Thomas Cvek	Refer to Rob Aaronson letter above
Anne Daugherty	Project Description; Recreation EIR section
	Transportation EIR section
Amy De Leon	Refer to Rob Aaronson letter above
Ronnie Dellarsina	Refer to Rob Aaronson letter above
Jason DeMendonca	Refer to Rob Aaronson letter above
Dom Dias	Planning Issue; Recreation EIR section
Matt DiBattista	Planning Issue; Recreation EIR section
Mike Dolan	Biological Resources section; Land Use and Planning EIR section
Brian Eddery	Refer to Rob Aaronson letter above
Alice Eyerman	Air Quality EIR section; Noise EIR section; Transportation EIR section
	Planning Issue; Biological Resources EIR section
Keith Finch	Cultural and Tribal Cultural Resources EIR section
	Refer to Rob Aaronson letter above
Mark Forte	Refer to Rob Aaronson letter above
Jose Galaz	Refer to Rob Aaronson letter above
Janet Garvin	Wildfire EIR section
	Transportation EIR section
	Hazards and Hazardous Materials EIR section; Transportation EIR section

	Biological Resources EIR section
	Public Services EIR section
	Alternatives EIR section
	Hazards and Hazardous Materials EIR section
	Cultural and Tribal Cultural Resources EIR section
	Not applicable to the EIR
Ronald and Gloria Gerak	Not applicable to the EIR
John Gerstenberg	Planning issue; Hazards and Hazardous Materials EIR section; Noise EIR section; Utilities and Service Systems EIR section
	Planning Issue; Wildfire EIR section
	Planning Issue; not applicable to the EIR
	Planning Issue; Project Description; Recreation EIR section
Zach Gianino	Transportation EIR section; Wildfire EIR section
	Hydrology and Water Quality EIR section
	Cultural and Tribal Cultural Resources EIR section
	Alternatives EIR section
Ricardo Gomez	Refer to Rob Aaronson letter above
Grady Gardner	Alternatives EIR section
Joseph Graf	Refer to Rob Aaronson letter above
Paul Greco	Refer to Rob Aaronson letter above
Ron and Danielle Griffin	Not applicable to the EIR
Bill Grolz	Biological Resources EIR section
	Alternatives EIR section
	Wildfire EIR section
Michael Gruber	Refer to Rob Aaronson letter above
Kyle Gunderman	Refer to Rob Aaronson letter above
Chris Haringer	Biological Resources EIR section; Transportation EIR section; Wildfire EIR section
	Refer to Rob Aaronson letter above
	Planning Issue; Recreation EIR section
David Hernandez	Refer to Rob Aaronson letter above
Sean Highfield	Refer to Rob Aaronson letter above
Tim Hill	Existing Condition Issue; Transportation EIR section
Eric Hollander	Refer to Rob Aaronson letter above
William Hooper	Refer to Rob Aaronson letter above
James Hoyle	Refer to Rob Aaronson letter above
Robert Hubbard	Refer to Rob Aaronson letter above
Howard and Marge Hudson	Transportation EIR section
Mary Hyder	Not applicable to the EIR
	Transportation EIR section
Jessica Iburg	Refer to Rob Aaronson letter above
Tim Ingersoll	Planning Issue; Recreation EIR section
Clark Jackson	Refer to Rob Aaronson letter above
Matthew Judge	Refer to Rob Aaronson letter above
Robert Kay	Refer to Rob Aaronson letter above
Colin Kennedy	Planning Issue; Recreation EIR section

Pam Kerzner	Not applicable to the EIR
	Alternatives EIR section
Andrew Khodaverdian	Refer to Rob Aaronson letter above
Kerstin Kirchsteiger	Refer to Rob Aaronson letter above
Austin Kruisheer	Refer to Rob Aaronson letter above
Patti Labouff	Not applicable to the EIR
	Wildfire EIR section
	Alternatives EIR section
	Alternatives EIR section; Recreation EIR section
Greg Lambert	Public Services EIR section; Transportation EIR section
	Planning issue; Not applicable to the EIR
	Biological Resources EIR section
	Cultural and Tribal Cultural Resources EIR section
	Hydrology and Water Quality EIR section; Utilities and Service Systems EIR section
Alison Liebrecht	Transportation EIR section; Wildfire EIR section
	Planning Issue; Recreation EIR section
	Utilities and Service Systems EIR section
Carol Livingston	Refer to Rob Aaronson letter above
David Loughlin	Refer to Rob Aaronson letter above
Jonathan Major	Refer to Rob Aaronson letter above
	Transportation EIR section
Jason McDonald	Refer to Rob Aaronson letter above
Sean McKelvey	Refer to Rob Aaronson letter above
Jim Messick	Utilities and Service Systems EIR section
	Transportation EIR section
Tina Meyer	Refer to Rob Aaronson letter above
Jacklin Mikhael-Fox	Noise EIR section; Traffic EIR section
	Biological Resources EIR section
	Planning issue; not applicable to EIR
James Miller	Refer to Rob Aaronson letter above
Mike Miller	Refer to Rob Aaronson letter above
Katie Molidor	Acknowledged and no response required.
Kyle Montgomery	Refer to Rob Aaronson letter above
Jerry Moseley	Transportation EIR section
	Not applicable to the EIR
	Project Description, Transportation EIR section, Noise EIR section
	Utilities and Service Systems EIR section
Josh Mundt	Refer to Rob Aaronson letter above
Sean Murphy	Planning Issue; Recreation EIR section
Susie Murphy	Refer to Rob Aaronson letter above
James Murren	Refer to Rob Aaronson letter above
Thomas Myrick	Refer to Rob Aaronson letter above
Jonathan Naguit	Refer to Rob Aaronson letter above
John Nobil	Refer to Rob Aaronson letter above

John Olsen	Transportation EIR section to the extent relevant to the project
Landon Pann	Refer to Rob Aaronson letter above
Michele Perchez	Wildfire EIR section
	Alternative EIR section
Walter Pershing	Refer to Rob Aaronson letter above
Jonathan Peverall	Refer to Rob Aaronson letter above
Chris Pickford	Refer to Rob Aaronson letter above
Daniel Pitard	Refer to Rob Aaronson letter above
Kathryn Prescott	Transportation EIR section
Michelle Racicot	Refer to Rob Aaronson letter above
Erasmus Ramos	Refer to Rob Aaronson letter above
Michael Ranson	Noise EIR section
	Planning Issue; not applicable to the EIR
	Aesthetics EIR section
	Planning Issue; not applicable to the EIR
	Hazards and Hazardous Materials EIR section; Transportation EIR section
Ben Raymond	Refer to Rob Aaronson letter above
Rudy Reyes	Cultural and Tribal Cultural Resources EIR section
	Not applicable to the EIR
Julie Riklin	Refer to Rob Aaronson letter above
	Transportation EIR section
Kirk Riley	Transportation EIR section
	Recreation EIR section
Jodie Rock	Refer to Rob Aaronson letter above
Trevor Rose	Refer to Rob Aaronson letter above
Ryen Russo	Refer to Rob Aaronson letter above
Susan Russo	Public Services EIR section; Transportation EIR section; Utilities and Service Systems
	Biological Resources EIR section
	Cultural and Tribal Cultural Resources EIR section
	Planning issue; not applicable to the EIR.
Sandy Schielke	Alternatives EIR section.
	Not applicable to the EIR.
	Planning issue; not applicable to the EIR.
	Biological Resources EIR section
	MSCP issue; not applicable to the EIR
	Transportation EIR section
	Geology and Soils EIR section

	Wildfire EIR section
	Hydrology and Water Quality EIR section
	Public Services EIR section
	Hazards and Hazardous Materials EIR section
	Transportation EIR section
	Air Quality EIR section
	Transportation EIR section
Gary Siebenlist	Refer to Rob Aaronson letter above
Evan Sollberger	Recreation EIR section
Aaron Starns	Refer to Rob Aaronson letter above
Alex Stillman	Recreation EIR section; Transportation EIR section
Jenece Tagg	Hazards and Hazardous Materials EIR section; Transportation EIR section
Martha Tassi	Alternatives EIR section
Mary Ann Valledor	Refer to Rob Aaronson letter above
Elizabeth Walk	Aesthetics EIR section
David Walsh	Refer to Rob Aaronson letter above
Kevin Westfall	Refer to Rob Aaronson letter above
Tanner Wheatley	Refer to Rob Aaronson letter above
Brandy Wirtz	Refer to Rob Aaronson letter above
Cynthia Wootton	Planning issue; not applicable to the EIR
	Air Quality EIR section; Hazards and Hazardous Materials EIR section; Wildfire EIR section
Nicholas Zahner	Refer to Rob Aaronson letter above

From: Rob Aaronson <no-reply@memberleap.com>
Sent: Sunday, December 9, 2018 9:53 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Rob Aaronson
7867 Rancho Fanita Dr, Unit G

Santee, CA 92071
8583441828

From: Abboud, Roy@DOT <roy.abboud@dot.ca.gov>
Sent: Monday, December 10, 2018 4:20 PM
To: Minjie Mei; John O'Donnell
Cc: Clark, Trent S@DOT; Fox, Ann M@DOT; Armstrong, Jacob M@DOT
Subject: Fanita Ranch NOP
Attachments: Fanita Ranch NOP 20181210.pdf

Hello John,

Please find the Caltrans Comment letter for the Fanita Ranch NOP SCH# 2005061118.
We hoping to have a meeting between Caltrans Planning and City of Santee staff to discuss the Fanita Ranch project and the efforts of HomeFed as they relate to the SR-52 Corridor improvement efforts.
Please let me know your availability to meet.

Thank you,
Roy Abboud
Associate Transportation Planner
619.688.6968
Caltrans District 11
4050 Taylor Street MS 240
San Diego, CA 92110

From: Evlyn Andrade-Heymsfield <evlyn57@gmail.com>
Sent: Monday, November 19, 2018 2:20 PM
To: John O'Donnell
Subject: Fanita Ranch

Hi John,

Could you please add me to list to receive notification of all information regarding the revision of the Environmental Impact Report for the Fanita Ranch Project.

Thanks,
Evlyn

From: Michael Andrade-Heysfield <mcheysfield@gmail.com>
Sent: Wednesday, November 21, 2018 2:52 PM
To: John O'Donnell
Subject: Fanita Ranch

Hi John,

I'd like to request notification of all information regarding the revision of the environmental impact report for the Fanita Ranch Project.

Have a happy Thanksgiving!

Thanks,

Mike

--

Mike Andrade-Heysfield

mcheysfield@gmail.com



FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: _____ Date: _____

request finer detail / distinction between various trail types on trail figure 5. (village access vs. nature trails). would trails be open to equestrians? dog friendly?

From: santeebutch <santeebutch@gmail.com>
Sent: Tuesday, November 27, 2018 3:20 PM
To: John O'Donnell
Subject: Fanita Ranch

Please do not move forward on this project. Our streets are already too congested and this project will make it worse. We the residents have voted this project down several times yet it keeps coming back.

Please do not allow the developers to buy Santee.

Sincerely,

William Apfelbaum

Sent from my Galaxy Tab A

From: Jem Arindaque <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Jem Arindaque
10167 Leavesly Trl.

Santee, CA 92071
6192089807

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING

4050 TAYLOR ST, M.S. 240

SAN DIEGO, CA 92110

PHONE (619) 688-6960

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life.*

December 10, 2018

11-SD-52

PM 13.27

NOP SCH 2005061118

Mr. John O'Donnell
City of Santee
10601 Magnolia Avenue
Santee, CA 92071-1266

Dear Mr. O'Donnell:

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Notice of Preparation (NOP) for the Fanita Ranch project, which will be located north of State Route 52 (SR-52) and State Route 67 (SR-67). Thank you for including Caltrans in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all land development projects. Caltrans would like to submit the following comments:

Caltrans entered into a Highway Improvement Agreement (HIA) with the Fanita Ranch project Applicant to fund a Project Initiation Document (PID) to help identify potential transportation improvements along the SR-52 Corridor. Those improvements are understood to be potential mitigations measures for the Fanita Ranch project.

The PID is anticipated to be completed by the early 2019. It is understood by Caltrans that subsequent HIA's will be developed that will cover the Environmental Clearance and Design of the preferred alternatives within Caltrans right-of-way (R/W) or included in the Fanita Ranch project California Environmental Quality Act (CEQA) document.

The alternatives that are being considered include:

- Constructing a two-way Bikeway (Separated Bikeway) on the south side of SR-52 (eastbound side) from Santo Road to Mast Boulevard
- Addition of a westbound SR-52 truck climbing lane from Mast Boulevard to I-15
- Addition of an eastbound SR-52 auxiliary lane from southbound I-15 loop ramp to the Santo Road eastbound off-ramp

- Restripe eastbound SR-52 from 2 lanes to 3 lanes from Mast Boulevard to just east of the San Diego River Bridge
- Widen the westbound on-ramp to SR-52 from Mast Boulevard
- Restripe westbound SR-52 to include a third lane from just east of the San Diego River Bridge to Mast Boulevard

The Fanita Ranch CEQA document, Traffic Impact Study (TIS), and mitigation measures should be consistent with assumptions in the PID. Continued coordination with Caltrans, City, and Applicant is recommended.

Please provide Caltrans an opportunity to be involved in an early review of the Fanita Ranch project TIS to determine its potential near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures. The data used in the TIS should not be more than 2 years old. Please also provide the complete set of electronic Synchro version 10 files.

All freeway entrance and exit ramps where a proposed project will add a significant number of peak-hour trips that may cause any traffic queues to exceed storage capacities should be analyzed. If ramp metering is to occur, a ramp queue analysis for all nearby Caltrans metered on-ramps is required to identify the delay to motorists using the on-ramps and the storage necessary to accommodate the queuing. The effects of ramp metering should be analyzed in the traffic study.

Caltrans endeavors that any direct and cumulative impacts to the State Highway System be eliminated or reduced to a level of insignificance pursuant to the CEQA and National Environmental Policy Act (NEPA) standards.

Mitigation measures to State facilities should be included in TIS. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation. This includes the actual implementation and collection of any “fair share” monies, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Control Evaluation (ICE) policy (Traffic Operation Policy Directive 13-02). Alternative intersection design(s) will need to be considered in accordance with the ICE policy. Please refer to the policy for more information and requirements. <http://www.dot.ca.gov/trafficops/ice.html>

Any work performed within Caltrans (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Mr. John O'Donnell

December 10, 2018

Page | 3

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits. If you have any questions or need further assistance, please contact Trent Clark at (619) 688-3140 or by email at trent.clark@dot.ca.gov.

Sincerely,



JACOB ARMSTRONG, Chief
Development Review Branch

From: Scott Armstrong <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

Scott Jordan Armstrong

From:
Scott Armstrong
3841 Park Blvd

San Diego, CA 92103
6192289220

From: Hector Ayala <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Hector Ayala
2106 Clairton pl

San Diego, CA 92154
7876493399

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsantee.ca.gov.

Name: Janet Barnett Date: 11/29/18

You must consider widening Mast Blvd. The commuting time traffic is already stop & go to the 52. When you add 3,000 ^{more} homes, the traffic on Mast will be unbearable. And I don't support tax

payer money going towards all the road widening to enable this huge development in an already crowded Santee.

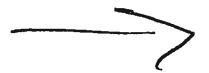
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Name: Janet Barnett Date: 11/29/18

- Consider the impact of needing more city infrastructure like grocery stores.
- Also consider the impact of that many more residents on all the roads in Santee that are such heavy traffic already



Will Fanita Parkway be widened first before any other work is started in the new development?

- Is there really room to add 2 more lanes on Fanita and a median (to keep 2 way traffic a little safer) and keep the bike lanes?

From: Anne Barron <barronsings@gmail.com>
Sent: Monday, November 19, 2018 9:01 AM
To: John O'Donnell
Subject: notification of materials related to the Fanita Ranch Project

John O'Donnell, Principal Planner -

I am requesting notification of all information regarding the revision of the Environmental Impact Report for the Fanita Ranch Project.

sincerely

Anne Barron

barronsings@gmail.com

9459-14 Mission Gorge Rd

Santee

--

"Another world is not only possible, she is on her way. On a quiet day, I can hear her breathing."

- [Arundhati Roy](#)

From: Matthew Bartelt <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Matthew Bartelt
9074 Meadowrun Way

San Diego, CA 92129
8582430047

From: Kris Beecher <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Kris Beecher
690 First Ave

Chula Vista, CA 91910
6299778644

FEEDBACK FORM

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Name: FRANK BENNETT

Date: 11/29/18

THIS DEVELOPMENT WILL RESULT IN THE LOSS OF MANY ESTABLISHED MOUNTAIN BIKE TRAILS. WHILE I UNDERSTAND THIS PROJECT WILL BE MOVING FORWARD, I URGE YOU TO WORK CLOSELY WITH THE SAN DIEGO MOUNTAIN BIKE ASSOCIATION FOR DESIGN AND CONSTRUCTION OF NEW TRAILS. WE PROVIDE HUNDREDS OF HOURS OF VOLUNTEER TRAIL LABOR EVERY YEAR AND CONSTRUCT TRAILS THAT ARE ENVIRONMENTALLY SUSTAINABLE AND STILL →

CHALLENGING TO RIDE. PLEASE DO NOT LEAVE NEW TRAIL DESIGN UP TO DEVELOPERS. FLAT DECOMPOSED GRANITE TRAILS ARE NOT WHAT WE ARE LOOKING FOR. LOSS OF THESE EXISTING TRAILS WILL LIKELY LEAD TO ILLEGAL CONSTRUCTION BY OTHER GROUPS IF A SUITABLE REPLACEMENT IS NOT CREATED.

From: Bennett <emailtobennett@gmail.com>
Sent: Wednesday, November 28, 2018 8:14 AM
To: John O'Donnell
Subject: Fanita Ranch

John,

Please place me on the notification list for any information regarding Fanita Ranch, including EIRs and traffic studies.

Thank you,

Mary Ann Bennett

From: Jay Bernal <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Jay Bernal
3036 Mission Village Drive

San Diego, CA 92123
619 459 2567

From: Bryan Boyd <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

From:
Bryan Boyd
4002 Mount Everest blvd

San Diego , CA 92111
8582321514

From: Bill Breeding <bbinsd@gmail.com>
Sent: Tuesday, November 27, 2018 5:23 PM
To: John O'Donnell
Subject: Fanita Ranch Notification List

Mr O'Donnell

Please add me to the Fanita Ranch notification list. I live at 10116 Sir Lancelot Dr Santee Ca 92071 and have a huge interest in this potential project.

Thank you.

William Breeding

From: Cinda Brown <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Cinda Brown
10316 Julio place

Santee, CA 92071
6199800697

From: Zach Bryan <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:31 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Zach Bryan
2315 desert zinnia rd

Rio Rancho , NM 87144
505 8991994

From: buncelaw@aol.com
Sent: Friday, December 7, 2018 10:24 AM
To: John O'Donnell
Subject: Comments of Barona Band of Mission Indians on Fanita Ranch Project
CEQA scoping
Attachments: O'Donnell Letter Dec. 6, 2018.pdf

Dear Mr. O'Donnell,

Attached is a letter that sets forth the concerns of the Barona Band of Mission Indians for the scoping of the CEQA compliance for the above project.

Please call me for any follow-up.

Sincerely,

Art Bunce

Tribal Attorney

LAW OFFICES OF ART BUNCE

ART BUNCE
ATTORNEY AT LAW

December 6, 2018

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

RE: Comments of Barona Band of Mission Indians on
Notice of Preparation of Draft Revised EIR for
Fanita Ranch Project (SCH #2005061118)

Dear Mr. O'Donnell,

On behalf of the Barona Band of Mission Indians, for which I serve as Tribal Attorney, I have already started engaging in consultation with you on behalf of the City of Santee under AB52 concerning the above project. You have already provided to me a disc containing the confidential Phase I Cultural Resources Report. I am following up now on the cultural resources issues for the draft revised EIR. The comment period extends until December 10, 2018.

The Phase I cultural resources report reviews all the previous reports and surveys of the area, and also describes and evaluates a current walk-over of the project area in light of those previous surveys and reports. Together, they confirm what has been known for some time: much of the area proposed to be developed is an extensive pre-European contact Native American village site. So far, at least four sets of human remains have been identified. The Barona Band is almost certainly the Most Likely Descendant of those whose remains have been discovered. The Barona Band is the successor to the Capitan Grande Band of Mission Indians, which inhabited the entire San Diego River Valley, with its primary villages on the Capitan Grande Indian Reservation. Where human remains and a major village site have already been discovered, there is a great likelihood of further human remains and associated funerary objects. All these, as well as the village site itself, are the patrimony of the Barona Band.

Because this is a major village site, whose extent and nature are not known, and because further human remains are likely to be involved, the Barona Band will expect the project proponent to do considerably more than the usual surface survey and monitoring that may be sufficient for smaller resources of less significance and without human remains. In particular, in terms of scoping the Phase II report, the Barona Band requests that the on-site surveys be much more intensive (e.g., closer transects, etc.) so that we will know much more about the exact spatial extent and nature of the village site, especially CA-SDI-8243, parts of which subsumed

101 STATE PLACE, SUITE C, ESCONDIDO, CA 92029
MAILING ADDRESS: P.O. BOX 2516, ESCONDIDO, CA 92033-2516
TELEPHONE: 760-489-0329 FAX: 760-489-1671

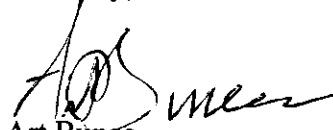
CA-SDI-8338 and its earlier components identified as CA-SDI-8338a, 8338b, and 8338c. The Phase I report links or consolidates several previously separately-identified sites in light of new information, and it is likely that the Phase II report will also do so. Further information will likely link all these sites into one village site which, if possessing the necessary integrity and other necessary features, may qualify it for inclusion on the National Register or the state equivalent.

In addition, p. 34 of the Phase I report notes that "the current project did not survey the low granitic hilltops previously recorded as CA-SDI-8243a which are known to contain the highest concentrations of cultural materials . . . [and] the valley floor between CA-SDI-8243a and CA-SDI-8338a". The Phase II survey must include these areas in full in order to determine the true extent and nature of the apparent village site.

Lastly, p. 38 of the Phase I report notes that the 2016 survey of CA-SDI-8345 "identified 1 likely and 3 possibly human bone fragments which were burned at high temperature, indicating cremation", and that "it is extremely likely that this bone represents human cremations which may extend into the subsurface." This is exactly the kind of site that requires further careful surface examination plus non-intrusive and respectful subsurface evaluation to determine the extent of the cremations.

The Barona Band will have much more to say on these subjects, based on the Phase II report and its analysis. But the above points will suffice to describe the scope of the Phase II report while we are still at the scoping stage of the CEQA process. Please call me with any questions.

Sincerely,


Art Bunce
Tribal Attorney

cc: Edwin "Thorpe" Romero, Chairman

LAW OFFICES OF ART BUNCE

ART BUNCE
ATTORNEY AT LAW

December 6, 2018

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

RECEIVED

DEC 10 2018

Dept. of Development Services
City of Santee

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Notice of Preparation of Draft Revised EIR for
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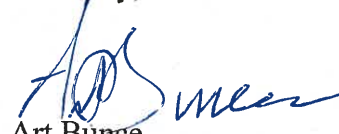
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Sincerely,


Art Bunce
Tribal Attorney

cc: Edwin "Thorpe" Romero, Chairman

From: Michael Candra <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 4:12 PM
To: John O'Donnell
Subject: Bitterroot Travel Plan Objection

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Michael Candra
5101 Barstow Street

San Diego, CA 92117
8588827289

From: MC <rotnacm@gmail.com>
Sent: Monday, November 26, 2018 8:14 PM
To: John O'Donnell
Subject: Environmental Impact Report

Mr O'Donnell:

Please place me on the notification list for Release of the Environmental Impact Report for Fanita Ranch.

Matt Cantor

From: Dan Carter <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Dan Carter
1822 N. Nutmeg St

Escondido, CA 92026
7603681108

From: Vince Carter <no-reply@memberleap.com>
Sent: Sunday, December 9, 2018 9:53 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Adding homes to this land will also increase the daily traffic by the 1000+™s. This will have a massive negative impact on the already overcrowded routes into and out of Santee. On bad days it takes over 45 minutes to get from central Santee to at least the 15, a drive which normally takes 10 minutes. Adding more homes and the ensuing traffic will be insane. Also there will be more air pollution with the added vehicles, all of which will directly limit access to the local High School and numerous elementary schools in West Santee.

Thank you for taking my feedback into account on this project,

From:
Vince Carter
7908 Rancho Fanita Drive Spc 71
Santee, CA 92071-3425
9499034404

From: Ronnie Casas <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Ronnie Casas
172 CITYSCAPE GLEN

Escondido , CA 92027
619-578-3255

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsantee.ca.gov.

Name: Bill Caswell Date: 11/29/18

These trees are I why I bought my house
in the neighborhood. Please Don't remove them.

Help us Improve Access.

From: Duarte, Dolores@Wildlife <Dolores.Duarte@wildlife.ca.gov>
Sent: Monday, December 10, 2018 8:29 AM
To: John O'Donnell
Cc: Beck, Christine@Wildlife; Williams, Carol@Wildlife; Mayer, David@Wildlife; Esguerra, Margarita@Wildlife; Sevens, Gail@Wildlife; 'state.clearinghouse@opr.ca.gov'; 'karen_goebel@fws.gov'; joconnor@hfc-ca.com
Subject: Copy of comment letter Re-Fanita Ranch City of Santee Project NOP-SCH2005061118-San Diego county
Attachments: pdf Fanita Ranch City of Santee NOP.pdf

Mr. O'Donnell,
Please see attached copy for your records. Original will follow.

If you have any questions, please contact Christine Beck at (858) 637-7188.

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

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Name: MARY CHAVEZ Date: 11-29-18

AM AWARE OF NEED TO BUILD. NOT 3,000. CAN LIVE WITH 1,500 IF EVACUATION NEEDS ARE MET. CURRENTLY I AM UNABLE TO ACCESS CARLTON OAKS AT CERTAIN HOURS. I LIVE IN HEARNY CR + HAVE TO USE LIGHT @ STOVER TO GET TO CARLTON HILLS BL.

From: Dan Chusid <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

I am against this development. It will ruin Santee's charm and bring gridlock to the areas approaching SR52 every day. A truly BAD idea.

Hard to believe anyone would want this overdevelopment in an area with limited access and fire dangers. Just widening streets everywhere is NOT a solution. Think about this. This development will cause many long time residents to leave due to the overcrowding it will bring to the area. Shame on these money hungry developers!

Thank you for taking my feedback into account on this project.

From:
Dan Chusid
9834 Settle Ct
Santee , CA 92071
8582121016

December 10, 2018

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

**Subject: CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT REVISED ENVIRONMENTAL IMPACT REPORT FOR THE FANITA
RANCH PROJECT (SCH #2005061118)**

Dear Mr. O'Donnell:

The City of San Diego ("City") Planning Department has received the Notice of Preparation (NOP) prepared by the City of Santee and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the NOP and appreciates this opportunity to provide comments to the City of Santee. Continued coordination between the City, the City of Santee, and other local, regional, state, and federal agencies will be essential, especially if future ministerial or discretionary actions on behalf of the City are required. In response to this request for public comments, the City has the following comments on the NOP for your consideration.

• • •

**TRANSPORTATION & STORM WATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE
PLANNER – MGStephens@sandiego.gov, 858-541-4361**

With the approximately 2,600-acre project site located entirely within the San Diego River watershed upstream from the City of San Diego, the Storm Water Division has a direct interest in the Draft Revised Environmental Impact Report (EIR). This includes any potential effects on downstream flows and water quality. The following comments are listed by heading and page number in the City of Santee NOP.

1. **Habitat Preserve, Page 3.** Will this project result in excess mitigation that will be available for purchase?
2. **Orchard Village/The Farm, Page 3.** Please consider reorganizing and placing "The Farm" section before the Orchard Village section or revise the last sentence to read... "The Farm, described below, would border Orchard Village to the northeast." Currently the Orchard Village section makes references to "The Farm" (described as "the

community focal point of Fanita Ranch”) without providing context until further down the page.

3. **Grading and Utilities, Page 5.** The fill and cut slopes should be designed with a stable slope ratio. Also consider the varying rock and soil conditions.
4. **Grading and Utilities, Page 5.** The NOP addresses pollutant control but does not specifically call out hydromodification. The EIR needs to address the potential for hydromodification as extensive grading (approximately 27,000,000 cubic yards of cut and fill) is expected to occur onsite.
5. **Development Phasing, Page 6.** With buildout anticipated to occur over a 10 to 15-year period, development phasing is a key consideration for a project of this magnitude.
6. **Preliminary Environmental Review, Page 7.** In developing the Hydrology and Water Quality section, include consideration of the San Diego River Watershed Management Area Water Quality Improvement Plan (WQIP).
7. **Preliminary Environmental Review (list of technical studies and supporting documents), Page 7.** Please clarify what is anticipated for “Green Streets Priority Development Project Exempt Stormwater Quality Management Plan.”
8. **Preliminary Environmental Review (list of technical studies and supporting documents), Page 8.** Will the Priority Development Stormwater Quality Management Plan and the Stormwater Infiltration Feasibility Study be sufficient to analyze effects on drainage patterns caused by constructing roads in existing natural drainages, or will a Hydrologic and Hydraulic Study be needed as well?

PLANNING DEPARTMENT – MYRA HERRMANN, SENIOR PLANNER –
MHerrmann@sandiego.gov, 619-446-5372

1. Incorporate a review of the draft Mission Trails Regional Park Master Plan Update and consider the effects of the Fanita Ranch Project on the proposed East Elliot trail system. Coordinate with the City of San Diego Planning Department and the City Parks and Recreation Department to ensure that there are no conflicts with the proposed trail system and that adequate access is provided and maintained as shown in the Master Plan Update.

DEVELOPMENT SERVICES DEPARTMENT – LEO ALO, ASSOCIATE TRAFFIC ENGINEER –
LAlo@sandiego.gov, 619-446-5033


1. The Transportation Impact Analysis in the DEIR should follow the guidelines of the *City of San Diego Traffic Impact Study Manual, July 1998*, including various scenarios to be included, for all transportation facilities within the City of San Diego evaluated.

2. The Transportation Impact Analysis in the DEIR should apply the *City of San Diego Significance Determination Thresholds, July 2016* for all transportation facilities within the City of San Diego evaluated.
3. The DEIR should include alternatives that avoid or lessen expected transportation/circulation/parking impacts, including at least one alternative that would avoid unmitigated significant impacts to the City of San Diego's transportation facilities.
4. Potentially impacted transportation facilities within the City of San Diego should be evaluated, and significant traffic impacts to these transportation facilities should be mitigated.
5. The DEIR should analyze the separate phases of the project with approximate timelines for each phase.
6. The DEIR should evaluate opportunities for enhanced access to the site via transit, bicycle, pedestrian or other modes.
7. The DEIR transportation impact analysis should include analysis of all mitigation for any construction traffic impacts, especially any additional impacts if staging cannot be accommodated onsite.
8. Pursuant to SB 743, we recommend the vehicle miles traveled analysis be included in the transportation impact analysis and DEIR.



Thank you for the opportunity to provide comments on the NOP. Please contact me directly if there are any questions regarding the contents of this letter or if the City of Santee would like to meet with City staff to discuss our comments. Please feel free to contact Rebecca Malone, Senior Planner, directly via email at RMalone@sandiego.gov or by phone at 619-446-5371.

Sincerely,



for

Alyssa Muto, Deputy Director
Planning Department

RM/ep

cc: Reviewing Departments (via email)
Review and Comment online file

From: Marni Borg <mborg@CityofSanteeCa.gov>
Sent: Thursday, November 15, 2018 12:42 PM
To: Diane Sandman
Subject: FW: Fanita Ranch

From: John O'Donnell
Sent: Wednesday, November 14, 2018 11:29 AM
To: Marni Borg
Cc: Melanie Kush
Subject: FW: Fanita Ranch

John O'Donnell | AICP | Principal Planner
(619) 258-4100, Extension 182
City of Santee | 10601 Magnolia Avenue
Santee, CA 92071

From: Clark, Trent S@DOT [<mailto:trent.clark@dot.ca.gov>]
Sent: Wednesday, November 14, 2018 10:16 AM
To: John O'Donnell; Minjie Mei
Cc: Abboud, Roy@DOT
Subject: Fanita Ranch

Hello John and Minjie,
CT just received the NOP notice for the Fanita Ranch project.
When the traffic impact study becomes available, can you send that our way for review and comment? Also, please have the consultant provide CT with the electronic synchro files.
Thanks so much.

Trent Clark, Associate Transportation Planner
CALTRANS District 11 – San Diego
Planning Division, Development Review Branch
4050 Taylor Street, M.S. 240
San Diego, CA 92110

Office: (619) 688-3140
Bldg 2 Fl 4 C14
trent.clark@dot.ca.gov

From: L Cole <lpcsun@yahoo.com>
Sent: Thursday, November 29, 2018 10:32 AM
To: John O'Donnell
Subject: Fanta Ranch

Please send me environmental impact reports and any other reports related to the Fanta Ranch project.

[Sent from Yahoo Mail on Android](#)

From: Save Fanita <savefanita@gmail.com>
Sent: Monday, December 10, 2018 4:54 PM
To: John O'Donnell
Cc: John Minto; Rob McNelis; Stephen Houlahan; Brian Jones; Ronn Hall
Subject: Fanita Ranch Scope of DREIR
Attachments: Fanita Ranch NOP Comment Letter 12102018.pdf

Dear Mr. O'Donnell and City Council members,

Please find our letter attached on the scope of the Fanita ranch DREIR.

Van K. Collinsworth, M.A.
Geographer, Director
Preserve Wild Santee
9222 Lake Canyon Road
Santee, CA 92071
Tel. (619) 258-7929

savefanita@gmail.com

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Preserve Wild Santee

December 10, 2018

John O'Donnell, Principal Planner
Santee City Council
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

RE: Notice of Preparation (NOP) of a Draft Revised Environmental Impact Report for the Fanita Ranch Project (SCH# 2005061118)

Dear Mr. O'Donnell and Santee City Councilmembers,

Preserve Wild Santee has provided input on Fanita Ranch project proposals for nearly 25 years. For more than a decade, the Center for Biological Diversity has joined Preserve Wild Santee's comments and litigation on Fanita Ranch developments. Our past comments and legal briefs are relevant to the new project application and could be reviewed.

The "New Abnormal"¹

Climate is breaking down because the atmosphere continues to be used as a waste disposal medium worldwide.² Global GHG emissions are rising again after a 3-year period of stabilization.³ The opportunity to limit warming to a manageable level has passed.⁴ Prior environmental documents for project proposals have not considered the "New Abnormal" climatic conditions that have brought extended droughts, lingering heat waves and expanded the fire season to a year round threat at the project site. The extreme conditions have serious implications for both people and endangered wildlife within the proposed project vicinity.

California has broken records repeatedly over the last two years for the largest⁵, the most deadly⁶ and the most destructive⁷ wildfires in state history. The Camp Fire destroyed the town of Paradise killing at least 88 people and burning 18,804 structures. The proposed project site and proposed circulation system has significant geographic similarities to Paradise that require analysis and disclosure in the Draft Revised Environmental Impact Report (DREIR).

The DREIR should consider all aspects of the project through the perspective of worsening climatic conditions.

California is failing to meet its 2020 Greenhouse Gas reduction targets according to a key finding of the California Air Resources Control Board. Vehicle Miles Travelled per Capita is trending up in the wrong direction.⁸ Approval of the auto-dependent Fanita Ranch project would be a significant cumulative impact upon the Climate and the State's ability to meet GHG reduction targets.⁹

How does the project and project alternatives (such as an open space conservation alternative) impact the effectiveness of a Santee Climate Action Plan and the ability to meet region-wide and state climate action targets? Differences should be quantified. The destiny of Fanita Ranch will determine the viability of Santee's Climate Action Plan and its Multiple Species Conservation Program Subarea Plan.

The City has failed to complete its Multiple Species Conservation Program Subarea Plan due in 2003. The deteriorating climate makes it even less plausible for a viable plan to be adopted that includes a development footprint on the Fanita Ranch. The Wildlife Agencies have been highly critical of the project footprint and density. What is the status of the Santee MSCP Subarea Plan relative to the project?

Besides lobbying at high levels in an attempt to get Wildlife Agency comments critical of the project withdrawn by superiors who are subject to political pressures, how does the project address the Wildlife Agency comments that are already public record?¹⁰

Wildfire and Public Safety

Fact: Highway 52 was closed during the 2003 Cedar Fire as the fire front moved across MCAS-Miramar, jumped the freeway and burned homes in Tierrasanta southwest of this failed multilane firebreak. In the subsequent fifteen years, thousands of new homes have been added to the region that have reduced the utility of SR-52 and attached routes to function as evacuation routes for existing and prospective Santee residents. The conditions conducive for extreme firestorms are becoming worse every year by increasingly congested roads and local weather extremes.

Evacuation should be considered for all of Santee under worst-case scenario fires with differing ignition points, wind speeds and directions under different project alternatives. Fire arrival times relative to evacuation requirement times must be disclosed. The changes in public safety for better or worse should be quantified under the different project alternatives. The likelihood of failure for those that are trapped and forced to shelter on site should be considered for both the project and



for those on the existing WUI that would be less able to evacuate due to increased traffic volumes/congestion originating from the project.



Mast Boulevard conditions are an impediment to evacuation

Multiple fire events in the region/state should be modeled to determine quantitatively how police and fire response is impacted and quantitatively impacts the timing and feasibility of evacuating the site. Failed evacuations were once again the source of fatalities in the past two devastating California fire seasons.¹¹ Paradise, during the Camp Fire is the most recent tragedy. The community of Paradise had planned and executed practice evacuation, yet it became California's deadliest wildfire. How often would there be practice evacuations of the project site?

Cal Fire should be requested to evaluate the project footprint, design, fire protection and evacuation plans in the same way that Wildlife Agencies are requested to evaluate biological impacts of projects. There is too much political pressure at the local level from office holders that hold the keys to department budgets for any local department to be relied upon for a sole independent opinion on fire safety for a prospective development in a known high fire hazard zone.¹²

There should be a detailed discussion of what the fire codes do and do not address and how that relates to good site planning. How does the site design of project alternatives differ in relation to the feasibility of executing fire suppression tactics? Fire officials try to avoid providing opinions about the feasibility of evacuations and shelter on site when evacuation routes are cut off. Elected officials like to pretend that a project is reasonably safe because a fire department official under their supervision has checked off the limited boxes. The reality is that local fire officials defer to city councils and refrain from providing input on planning issues essential for public safety.



Please evaluate and quantify the levels of human casualty risk associated with different project designs/alternatives and mitigation measures. What is the full range of specific risks resulting to first responders of the alternatives and mitigation measures considered? Consider that different designs provide different levels of risk for the first responders that are drawn by circumstance to risk their lives for people that should have evacuated or could not evacuate.

The Fanita Ranch has many geographic constraints to development. The further north homes are located on the site the greater the direct alignment of those homes to the continuous vegetation within the Santa Ana wind driven fire corridor. Fanita Mountain on the northeast portion of the site has numerous drainages that act as heat chimneys to the housing to be embedded within chaparral. Fire accelerates up where seasonal rainwater runs down.

The southern portion of Fanita consists of steep unstable soils with 24 ancient landslides documented in prior geologic analysis. All of Fanita, except the riparian area of Sycamore Canyon Creek is mapped as a "Very High Fire Hazard Severity Zone" (VHFHSZ). Building on or below unstable slopes can leave homes that might survive a fire under moderate conditions vulnerable to mudslides.

When considering the VHFHSZ, geologic instability of Friars formation soils in the south and the flood plain for Sycamore and Clarke Canyon Creeks, there is little or no land available for development from a public safety prospective. The resource values of this land supersede any short-term profit benefits that will transform into long-term public liabilities if developed.

As part of its fire safety analysis, the EIR should evaluate the project's impacts on fire evacuation, including for existing residents. Evacuation of Fanita during Santa Ana wind driven firestorms may be impossible dependent upon distance away and orientation of ignition points. Evacuation requirements relative to ignition points need to be disclosed relative to the existing constraints of the two exit roads connecting to the already congested Mast Boulevard.

There should be a discussion of how fuel loads will or will not be managed over time on all developed and undeveloped lands, including the full environmental consequences of fuel management. While it is possible to create defensible space zones that prevent direct flame impingement originating from undeveloped lands, embers may threaten structures that originate from well beyond the defensible space zones. Fire resistant structures are not fire proof. Vulnerabilities of structures should be analyzed and disclosed. Lot sizes and specifically the distances between structures are critical factors when a wildfire transforms into an urban fire capable of cluster burning entire neighborhoods.



New structures are composed of different fuels than exist on a natural site. What are the toxins contained in new subdivisions and how would the release of massive toxicity from their combustion impact biological resources and the only clean waterways left in Santee?

The total length of the Wildland-Urban-Interface (WUI) in Santee should be calculated and compared to the amount of WUI that will be added by the project. What is the Santee Fire Department's current estimated response time and how has that changed over time? What is the total capacity of the department in personnel, engines, type of engines and utility for WUI firestorms?

What input on the land-use design footprint of the project has Cal Fire and the Santee Fire Department provided? Not defensible space zones – but actual locations of development relative to site topography / geography. Are roads and parks used as buffers, escape routes or safety zones? Are housing features like large windows, vents, doors and garage doors oriented to be sheltered away from Santa Ana winds? Considering the impracticality of evacuating the project, where are the safety zones on the site? Shelter in homes should not be used as a safety strategy due to the density of the proposed project and its potential for cluster burns. The closer homes are to each other the more likely they are to burn when a wildfire transitions into an urban fire.¹³

Evacuation becomes chaotic and deadly when emergency responders are overwhelmed by rapidly spreading firestorms.¹⁴ Chaos similar to the Camp Fire is probable on Fanita Ranch due to the alignment with the Santa Ana wind driven fire corridor.

“There was little to nothing anyone could do once this firestorm got started. First responders did the correct thing in just evacuating and tending to their own personal safety. Getting out of the way of this firestorm was all anybody could do...You are not going to be able to rely upon anybody else but yourself if caught in one of these events. You have to rely upon yourself to get yourself out of harms way in a timely fashion. All systems, all emergency systems, all emergency responders, everybody was absolutely overwhelmed to respond to this firestorm. Folks simply could not respond quick enough.”¹⁵



Water Supply

What source of energy will be required to provide water to the project? What are the vulnerabilities of that power supply and pump mechanism? If the water supply infrastructure to the project fails, how much water would remain for emergency use and at what pressure at the most distant portions of the project?

Water supply for the entire project should be examined under the recognition that climate breakdown is resulting in mining of groundwater supplies and drought in the western United States that is capable of eliminating supplies.¹⁶

Biological Resources

Fanita Ranch is core biological habitat for numerous sensitive and endangered species that would be significantly impacted directly and indirectly by the project. Project impacts to species would now be compounded by extended droughts, extended heat waves and other extreme weather patterns associated with climate breakdown, such as infrequent, but more intense rain events. Therefore, traditional methods of mitigation, monitoring and management may be insufficient to maintain the diversity of species at the site that are not directly impacted by grading.

The impacts to narrow endemic species do not conform to requirements of the multi-decade “draft” Santee Multiple Species Subarea Plan.

Fanita Ranch could be an essential part of a recovery unit for the endangered Quino checkerspot butterfly. However, the project would preclude the ability to sustain Quino on site and undermine the viability of any recovery unit established in the vicinity. Quino has declined significantly over the last decade due to loss of its habitat from increased urban development. Climate change, drought, pollution, invasive plants and fire threaten the butterfly as well.¹⁷ The EIR should consider the project’s potential to impair recovery of Quino. In addition, the EIR’s analysis of cumulative impacts should consider an updated set of other past, present, and future projects that may affect Quino and Quino recovery, including the Otay Ranch Village 13 and 14 projects and the international border wall.

Alternatives

100% Conservation Alternative

Please include a “100% Conservation of Open Space Alternative” within the Draft Revised Environmental Impact Report (DREIR) distinct from the no project alternative. A thorough documentation of conservation funding sources (and those sources current status and eligibility requirements) would provide essential distinction from a no project alternative.



A Conservation Alternative would be a win for both the proponent and the community, especially since HomeFed obtained Fanita Ranch after the auction process with clean title at an extremely low price of approximately \$12 million.

The Conservation Alternative should consider the current status of funding sources such as the Department of Defense Readiness and Environmental Protection Integration Program, Transnet conservation funds, Wildlife Agency funding sources, the Federal Land and Water Conservation Fund, State sources and prominent private funding sources.

Climate Action Alternative

A net zero energy consumption and net zero GHG emission alternative (including mobile sources) should be analyzed. Considering the dire circumstances of climate breakdown, net zero should be the goal of any alternative analyzed including the project.

Limited Development Alternatives

Alternatives that limit development to under 20% and under 10% of the Fanita Ranch site and an alternative consistent with the Santee General Plan should be considered. There should be a comprehensive discussion about how much of the site presents the highest fire risk and how a 10% development alternative might align with avoiding the areas of the site most vulnerable to firestorms.

The Wildlife Agencies stated that development of Fanita Ranch requires conservation of 15 pair of California gnatcatchers offsite west of I-15 on a minimum of 210-acres of high quality habitat that is part of a larger block of habitat. It must add linkage and function to the regional Multiple Species preserve.¹⁸ The project fails to meet this requirement. If the applicant cannot meet this requirement, a development alternative limited to 10% of the site, potentially expanded by conservation offsite in the "Magnolia Bowl" just south of the site boundary should be analyzed.

Any partial development alternative should be composed in a consolidated footprint. The most southeast portion of the site should be the first place considered for a limited development alternative.

Again – conservation of the entire site would be a win for the applicant and the public interest.



Thank you for considering these comments.



Van K. Collinsworth
Geographer/ Director
Preserve Wild Santee

John Buse



John Buse
Senior Staff Attorney, Center for Biological Diversity

Attachments

¹ The “New Abnormal” are the words of Governor Jerry Brown recognizing the climatic conditions that established the setting for the catastrophic Camp Fire

² Carrington, Damian. “Climate-heating greenhouse gases at record levels, says UN” The Guardian, 11/22/2018.

<https://www.theguardian.com/environment/2018/nov/22/climate-heating-greenhouse-gases-at-record-levels-says-un>

³ UN Environment 2018 Emissions Gap Report. 11/27/2018

<https://www.unenvironment.org/resources/emissions-gap-report-2018>

⁴ World Meteorological Organization Greenhouse Gas Bulletin. 11/22/2018

https://library.wmo.int/doc_num.php?explnum_id=5455

⁵ Cal Fire. Top 20 Largest California Wildfires.

https://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Acres.pdf

⁶ Cal Fire. Top 20 Deadliest California Wildfires.

https://calfire.ca.gov/communications/downloads/fact_sheets/Top20_Deadliest.pdf

⁷ Cal Fire. Top 20 Most Destructive California Wildfires.

http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Destruction.pdf

⁸ California Air Resources Board. 2018 Progress Report California Sustainable Communities and Climate Protection Act, November 2018. Page 4.

https://ww2.arb.ca.gov/sites/default/files/2018-11/Final2018Report_SB150_112618_02_Report.pdf

⁹ Pierre-Louis, Kendra. “Greenhouse Gas Emissions Accelerate ‘Like a Speeding Freight Train’ in 2018. New York Times. 12/05/2018.

<https://www.nytimes.com/2018/12/05/climate/greenhouse-gas-emissions->



[2018.html?fbclid=IwAR0L3NYGsadmVqn-J4i-xNE -diwDne-tSrMmCvENWHVIPkcJGTGoWCUj9Q](#)

¹⁰ Goebel, Karen A. and Sevrins, Gail. 12/20/2016. USFWS & CADFW joint letter. "Proposed Fanita Ranch Project within the City of Santee Draft MSCP Subarea Plan, City of Santee, San Diego County, California".

¹¹ Johnson, Lizzy. "150 Minutes of Hell." San Francisco Chronicle. December 5, 2018. <https://projects.sfchronicle.com/2018/carr-fire-tornado/?fbclid=IwAR3zp3NNnwU-wj9GIW34P0gVjGf-pvAWALfyJWSpEbp-FTD40798C2NnlX4#nws=mcnewsletter>

¹² LA Times Editorial Board. "Just say no to more Southern California sprawl." 12/08/2018. <https://www.latimes.com/opinion/editorials/la-ed-centennial-development-20181208-story.html?fbclid=IwAR1138kyqnhwaRxFV09Op1QFsT80K1kSWaAQuaqkvmp6Ql7L31e6G2r14zA>

¹³ Browne, Juan. "Paradise Ca, Camp fire flyover." Video 19:30. November 30, 2018. <https://www.youtube.com/watch?v=3LxWKaiZ5o4>

¹⁴ Rong-Gong Lin II and Maria L. La Ganga. "As fire traps 150, 'are we gonna die?'" LA times, 12/2/2018. <https://www.pressreader.com/usa/los-angeles-times/20181202/281496457351546>

¹⁵ Brown, Juan. "Paradise Ca, Camp Fire flyover." Video 21:40. November 30, 2018. <https://www.youtube.com/watch?v=3LxWKaiZ5o4>

¹⁶ US Environmental Protection Agency. Understanding the Link between Climate Change and Extreme Weather. 2013.

¹⁷ Cox, Lisa. San Diego National Wildlife Refuge Complex, Pacific Southwest Region. June, 5, 2017 <http://wildlife.org/rare-butterfly-reintroduced-on-san-diego-nwr/>
Strahm, Spring. Quino Checkerspot Butterfly Recovery. Conservation Biology Institute. 2017. <https://consbio.org/newsroom/news/quino-checkerspot-butterfly-recovery>

¹⁸ Wynn, Susan E. and Tippets, "Fanita Ranch MSCP Agreement." US Fish & Wildlife Service & California Department of Fish & Game, December 6, 2002.



From: Save Fanita <savefanita@gmail.com>
Sent: Monday, December 10, 2018 9:35 PM
To: John O'Donnell
Cc: John Minto; Rob McNelis; Stephen Houlahan; Brian Jones; Ronn Hall
Subject: End Note References - Scope of Fanita DREIR
Attachments: End Notes Binder PWS CBD Fanita 12102018.pdf

Dear Mr. O'Donnell and City Council members,

Attached is an End Note Reference Binder for our Fanita scope letter submitted earlier today.

Best Regards

Van K. Collinsworth, M.A.
Geographer, Director
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9222 Lake Canyon Road
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(619) 258-7929

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Climate-heating greenhouse gases at record levels, says UN

Carbon dioxide, methane and nitrous oxide are far above pre-industrial levels

Damian Carrington *Environment editor*

Thu 22 Nov 2018 04.00 EST

The main greenhouse gas emissions driving climate change have all reached record levels, the UN's meteorology experts have reported.

Carbon dioxide, methane and nitrous oxide are now far above pre-industrial levels, with no sign of a reversal of the upward trend, a World Meteorological Organization report says.

“The last time the Earth experienced a comparable concentration of CO₂ was 3-5m years ago, when the temperature was 2-3C warmer and sea level was 10-20 metres higher than now,” said the WMO secretary general, Petteri Taalas.

“The science is clear. Without rapid cuts in CO₂ and other greenhouse gases, climate change will have increasingly destructive and irreversible impacts on life on Earth. The window of opportunity for action is almost closed.”

Levels of CO₂ rose to a global average of 405.5 parts per million in the atmosphere in 2017 - almost 50% higher than before the industrial revolution.

Levels of methane, a potent greenhouse gas responsible for about 17% of global warming are now 2.5 times higher than pre-industrial times owing to emissions from cattle, rice paddies and leaks from oil and gas wells.

Nitrous oxide, which also warms the planet and destroys the Earth’s protective ozone layer, is now over 20% higher than pre-industrial levels. About 40% of N₂O comes from human activities including soil degradation, fertiliser use and industry.

The WMO also highlighted the discovery of illicit production of CFC-11, a banned chemical that also both warms the planet and destroys ozone. Investigations indicate that at least some of the production is in China.

In October the world’s scientists said global warming of even 1.5C would have severe consequences for humanity. International climate agreements had for two decades set 2C as a limit.

“Every fraction of a degree of global warming matters, and so does every part per million of greenhouse gases,” said the WMO deputy secretary general, Elena Manaenkova. “CO₂ remains in the atmosphere for hundreds of years and in the oceans for even longer. There is currently no magic wand to remove all the excess CO₂ from the atmosphere.”

Prof Corinne Le Quéré, of the University of East Anglia, said she was not surprised by the new record levels of greenhouse gases. “But I am very concerned that all three gases most responsible for climate change are rising upwards unabated. It seems the urgency and extent of the actions needed to address climate change have not sunk in.

“Low-carbon technologies like wind, solar, and electric transport need to become mainstream, with old-fashioned polluting fossils pushed out rapidly.”

Efforts to cut emissions are increasing and on Wednesday the UN’s climate change body published a report on the commitments made in 2018. It found 9,000 cities in 128 countries were taking action, along with 240 states and regions in 40 countries and more than 6,000 businesses in 120 countries.

Patricia Espinosa, head of the UN framework convention on climate change, said: “On one hand, greenhouse gas emissions have yet to peak and countries struggle to maintain the concentrated attention and effort needed for a successful response to climate change. On the other hand, climate action is occurring, it is increasing and there is a will to do more. I highlight this because falling into despair and hopelessness is a danger equal to complacency, none of which we can afford.”

●. This article was corrected on 22 November 2018. An earlier version said that at an average of 405.5 parts per million CO₂ levels in recent times were two-and-a-half times higher than before the industrial revolution, and that methane levels were 3.5 times higher. Nitrous oxide levels were said to be at more than double pre-industrial levels.

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Emissions Gap Report 2018

27 November 2018

Authors: UN Environment



Emissions Gap Report



The goal of the Paris Agreement on climate change, as agreed at the Conference of the Parties in 2015, is to keep global temperature rise this century to well below 2 degrees Celsius above pre-industrial levels. It also calls for efforts to limit the temperature increase even further to 1.5 degrees Celsius.

The annual UN Environment Emissions Gap Report presents an assessment of current national mitigation efforts and the ambitions

countries have presented in their Nationally Determined Contributions, which form the foundation of the Paris Agreement.

What's new in this year's report?

Update on global emissions

This year, the Emissions Gap Report includes an assessment of the emissions associated with the Nationally Determined Contributions and current policies of each of the G20 members, including the European Union. This is in addition to presenting an update on global greenhouse gas emissions and national actions to meet the earlier Cancun pledges.

Update on emissions gap

The Report features new information on the 'emissions gap', which is the gap between where we are likely to be and where we need to be. It takes into

account the latest scientific information, including the IPCC Special Report on 1.5°C.

Ways to bridge the emissions gap

Every year, the report also features ways to bridge the still existing emissions gap. This year these topics are fiscal policy, the role of innovation, the role of non-state and subnational action and ways to increase the ambition of the Nationally Determined Contributions. The report has been prepared by an international team of leading scientists, assessing all available information.

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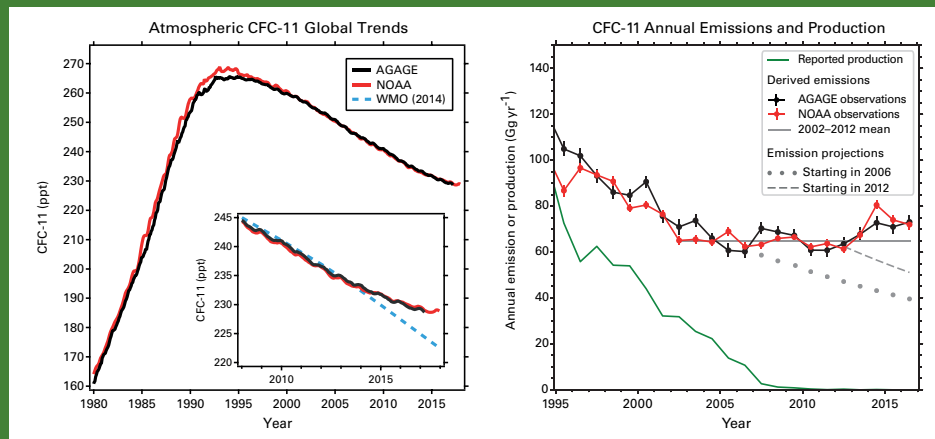
WMO GREENHOUSE GAS BULLETIN

The State of Greenhouse Gases in the Atmosphere
 Based on Global Observations through 2017

No. 14 | 22 November 2018

ISSN 2078-0796

Unexpected Increases in Global Emissions of CFC-11



the Advanced Global Atmospheric Gases Experiment (AGAGE; shown in black) and the National Oceanic and Atmospheric Administration (NOAA; shown in red) measurement networks. Also shown in the inset to this graph is the trend that was predicted in 2014 by WMO (blue dashed) assuming adherence to the Montreal Protocol [3].

Modelling results lead to the robust conclusion that these changes are predominately related to increased CFC-11 emissions rather than to other

Measurements of the atmospheric abundance of the chlorofluorocarbon CFC-11, a potent greenhouse gas (GHG) and a stratospheric ozone-depleting substance (ODS) regulated under the Montreal Protocol on Substances that Deplete the Ozone Layer, show that since 2012 its rate of decline has slowed to roughly two thirds of its rate of decline during the preceding decade [1, 2]. The most likely cause of this slowing is increased emissions associated with production of CFC-11 in eastern Asia. This discovery illustrates the importance of long-term measurements of atmospheric composition, such as are carried out under the auspices of the Global Atmosphere Watch (GAW) Programme of WMO, in providing effective support and additional constraints for emissions-control legislation.

The Montreal Protocol was designed to protect the stratospheric ozone layer by restricting the production of ODSs such as CFCs. As a consequence, CFC-11 (trichlorofluoromethane, or CCl_3F) production reported under the Montreal Protocol declined to zero by 2010. As CFC-11 was phased out, its atmospheric abundance peaked in the early 1990s and then declined in a manner largely consistent with declining production combined with residual emissions of CFC-11 gradually escaping from stored “banks” in existing products and equipment.

Atmospheric measurements of CFC-11 made by independent global networks show that since 2012 the rate of decrease in atmospheric CFC-11 has slowed to roughly two thirds of the rate that was observed between 2002 and 2012 [1, 2]. These global trends are shown in the left graph of the figure for

possible causes such as changing atmospheric transport. This conclusion is supported by recent increases in the northern to southern hemisphere difference in atmospheric concentration levels. Correlations between elevated abundances of CFC-11 and other measured gases further suggest that these increases originate from emissions in eastern Asia [1].

Separate CFC-11 emission trends resulting from model calculations taken from the 2018 WMO ozone assessment [2], based on data from each of the global measurement networks AGAGE (black) and NOAA (red), are shown in the graph on the right of the figure. They are contrasted to CFC-11 production as reported under the Montreal Protocol (green). These results show a levelling off of CFC-11 emissions around 2005, followed by an emission increase of about 15% after 2012. Emission scenario projections for the years 2006 and 2012 based on atmospheric data, reported production and releases from banks are shown as dots and dashes (grey), respectively.

This work demonstrates the importance of long-term measurements of atmospheric composition, such as are carried out under the auspices of the GAW Programme, in providing observation-based information to support national emission inventories, especially in the context of agreements to address anthropogenic climate change, as well as for the recovery of the stratospheric ozone layer.

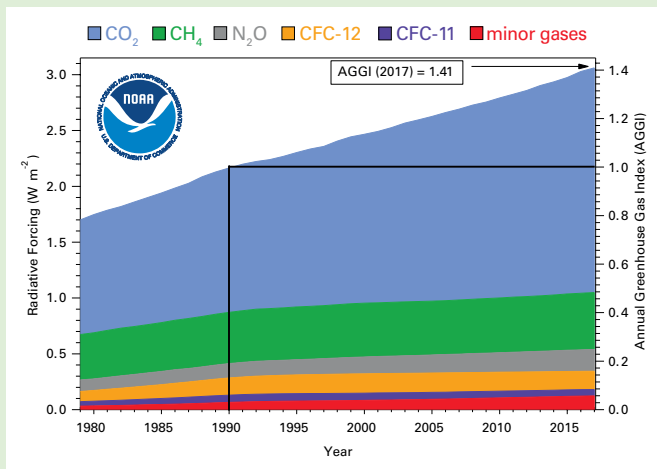


Figure 1. Atmospheric radiative forcing, relative to 1750, of LLGHGs and the 2017 update of the NOAA AGGI [4]

Table 1. Global annual surface mean abundances (2017) and trends of key GHGs from the WMO GAW global GHG observational network. Units are dry-air mole fractions, uncertainties are 68% confidence limits [5], and the averaging method is described in [7]. The numbers of stations used for the analyses are 129 for CO₂, 126 for CH₄ and 96 for N₂O.

	CO ₂	CH ₄	N ₂ O
Global abundance in 2017	405.5±0.1 ppm	1859±2 ppb	329.9±0.1 ppb
2017 abundance relative to year 1750*	146%	257%	122%
2016–2017 absolute increase	2.2 ppm	7 ppb	0.9 ppb
2016–2017 relative increase	0.55%	0.38%	0.27%
Mean annual absolute increase of last 10 years	2.24 ppm yr ⁻¹	6.9 ppb yr ⁻¹	0.93 ppb yr ⁻¹

* Assuming a pre-industrial mole fraction of 278 ppm for CO₂, 722 ppb for CH₄ and 270 ppb for N₂O.

Executive summary

The latest analysis of observations from the WMO GAW Programme shows that globally averaged surface mole fractions⁽¹⁾ calculated from this in situ network for carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O) reached new highs in 2017, with CO₂ at 405.5 ± 0.1 ppm⁽²⁾, CH₄ at 1859 ± 2 ppb⁽³⁾ and N₂O at 329.9 ± 0.1 ppb. These values constitute, respectively, 146%, 257% and 122% of pre-industrial (before 1750) levels. The increase in CO₂ from 2016 to 2017 was smaller than that observed from 2015 to 2016 and practically equal to the average growth rate over the last decade. The influence of the El Niño event that peaked in 2015 and 2016 and contributed to the increased growth rate during that period sharply declined in 2017. For CH₄, the increase from 2016 to 2017 was lower than that observed from 2015 to 2016 but practically equal to the average over the last decade. For N₂O, the increase from 2016 to 2017 was higher than that observed from 2015 to 2016 and practically equal to the average growth rate over the past 10 years. The NOAA Annual Greenhouse Gas Index (AGGI) [4] shows that from 1990 to 2017 radiative forcing by long-lived GHGs (LLGHGs) increased by 41%, with CO₂ accounting for about 82% of this increase.

Overview of the GAW in situ network observations for 2017

This fourteenth WMO Greenhouse Gas Bulletin reports atmospheric abundances and rates of change of the most important LLGHGs – CO₂, CH₄ and N₂O – and provides a summary of the contributions of other gases. These three, together with CFC-12 and CFC-11, account for approximately 96%⁽⁴⁾ of radiative forcing due to LLGHGs (Figure 1).

The GAW Programme (<http://www.wmo.int/gaw>) coordinates systematic observations and analysis of GHGs and other trace species. Sites where GHGs have been measured in the last decade are shown in Figure 2. Measurement data are reported by participating countries and archived and distributed by the WMO World Data Centre for Greenhouse Gases (WDCGG) at the Japan Meteorological Agency.

The results reported here by WDCGG for the global average and growth rate are slightly different from results reported by NOAA for the same years [6] due to differences in the

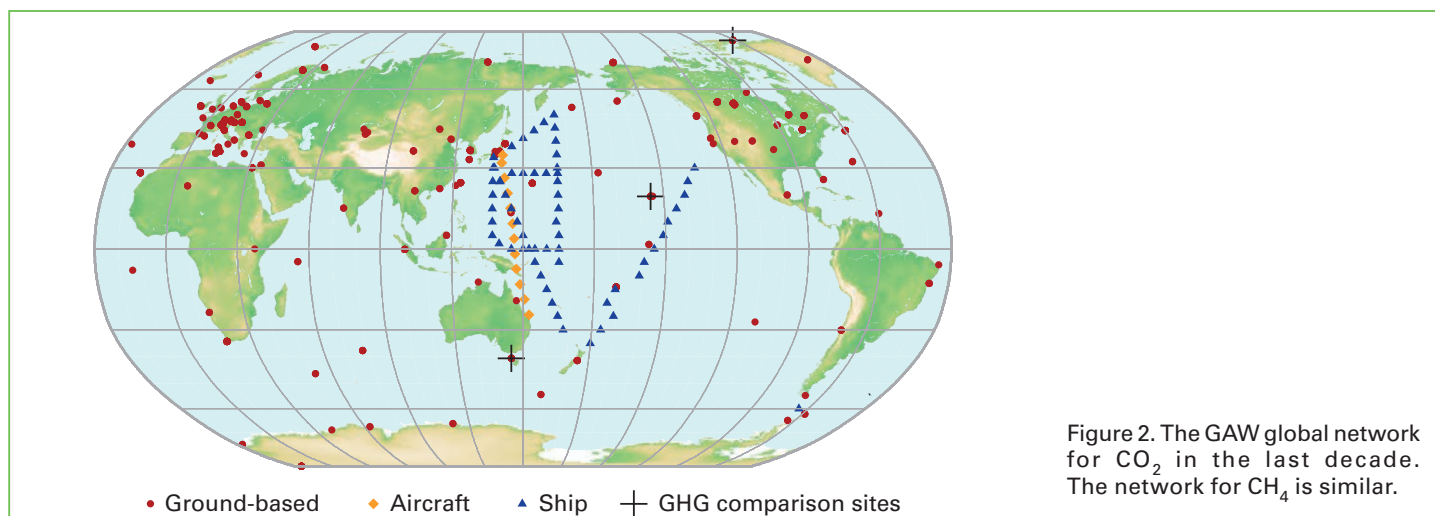


Figure 2. The GAW global network for CO₂ in the last decade. The network for CH₄ is similar.

with the exception of NOAA sampling in the eastern Pacific, are not used for this global analysis.

The three GHGs shown in Table 1 are closely linked to anthropogenic activities and also interact strongly with the biosphere and the oceans. Predicting the evolution of the atmospheric content of GHGs requires quantitative understanding of their many sources, sinks and chemical transformations in the atmosphere. Observations from GAW provide invaluable constraints on the budgets of these and other LLGHGs, and they are used to support emission inventories preparation and evaluate satellite retrievals of LLGHG column averages. The Integrated Global Greenhouse Gas Information System (IG³IS), promoted by WMO, provides further insights on the sources of GHGs on the national and sub-national level. Some examples of the information that is delivered by the IG³IS projects can be found in the central insert of this Bulletin.

The NOAA AGGI [4] in 2017 was 1.41, representing a 41% increase in total radiative forcing⁽⁴⁾ by all LLGHGs since 1990 and a 1.6% increase from 2016 to 2017 (Figure 1). The total radiative forcing by all LLGHGs in 2017 (3.062 W m⁻²) corresponds to an equivalent CO₂ mole fraction of 493 ppm [4]. Relative contributions of the other gases in the total radiative forcing since pre-industrial time are presented in Figure 3.

Carbon dioxide

Carbon dioxide is the single most important anthropogenic GHG in the atmosphere, contributing approximately 66%⁽⁴⁾ of the radiative forcing by LLGHGs. It is responsible for approximately 82%⁽⁴⁾ of the increase in radiative forcing

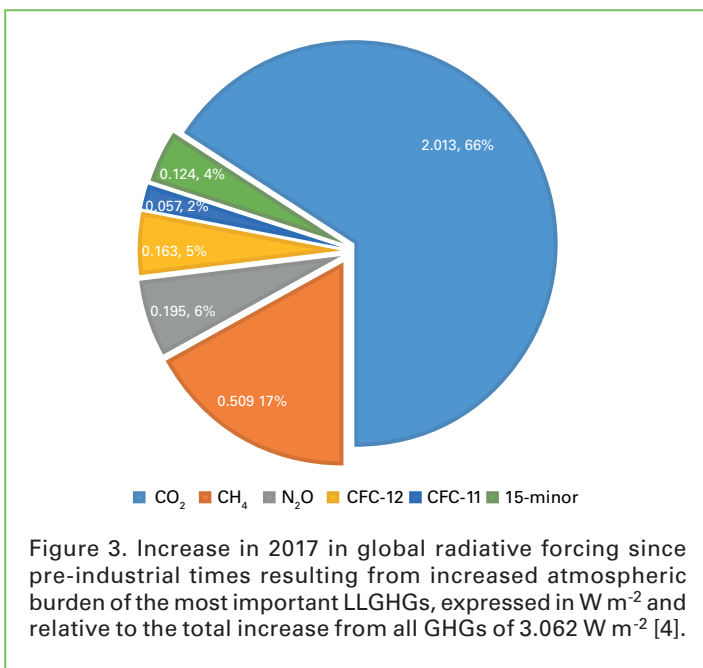


Figure 3. Increase in 2017 in global radiative forcing since pre-industrial times resulting from increased atmospheric burden of the most important LLGHGs, expressed in W m⁻² and relative to the total increase from all GHGs of 3.062 W m⁻² [4].

stations used, differences in the averaging procedure and a slightly different time period for which the numbers are representative. WDCGG follows the procedure described in detail in [7].

Table 1 provides globally averaged atmospheric abundances of the three major LLGHGs in 2017 and changes in their abundances since 2016 and 1750. Data from mobile stations (blue triangles and orange diamonds in Figure 2),

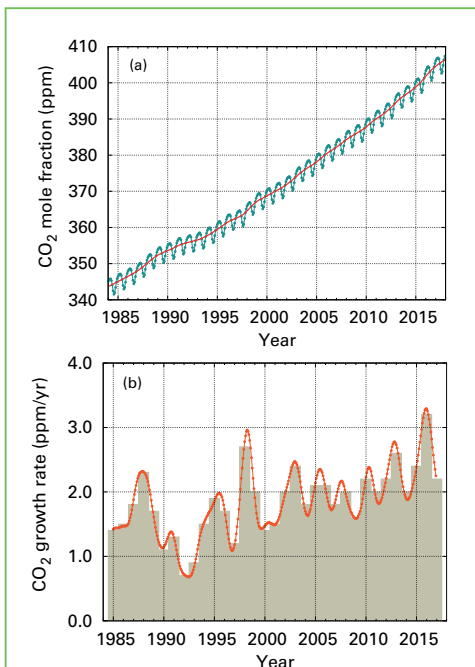


Figure 4. Globally averaged CO₂ mole fraction (a) and its growth rate (b) from 1984 to 2017. Increases in successive annual means are shown as the shaded columns in (b). The red line in (a) is the monthly mean with the seasonal variation removed; the blue dots and line depict the monthly averages. Observations from 129 stations have been used for this analysis.

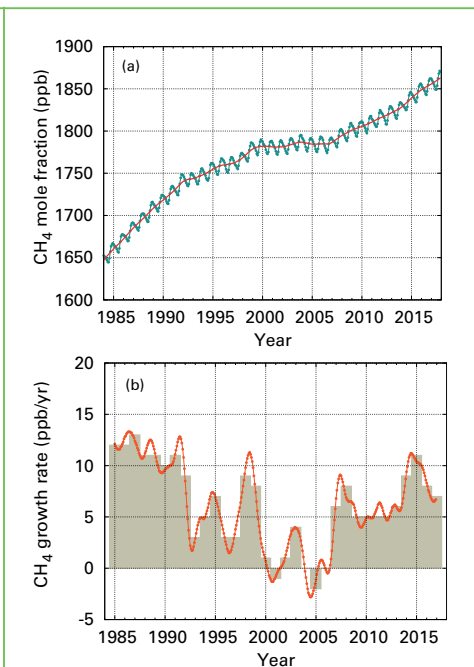


Figure 5. Globally averaged CH₄ mole fraction (a) and its growth rate (b) from 1984 to 2017. Increases in successive annual means are shown as the shaded columns in (b). The red line in (a) is the monthly mean with the seasonal variation removed; the blue dots and line depict the monthly averages. Observations from 126 stations have been used for this analysis.

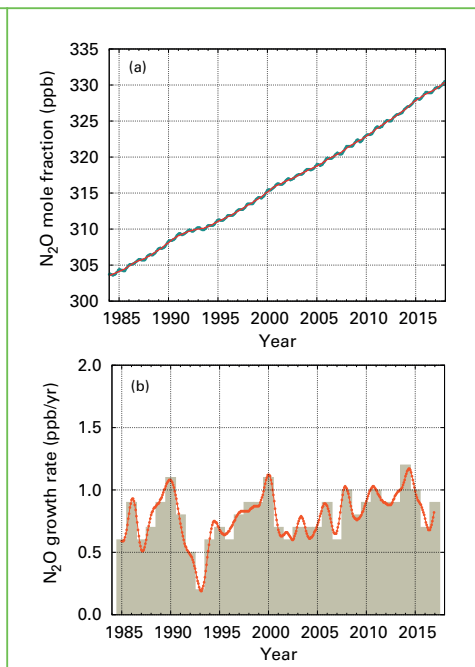


Figure 6. Globally averaged N₂O mole fraction (a) and its growth rate (b) from 1984 to 2017. Increases in successive annual means are shown as the shaded columns in (b). The red line in (a) is the monthly mean with the seasonal variation removed; in this plot it is overlapping with the blue dots and line that depict the monthly averages. Observations from 96 stations have been used for this analysis.

ATMOSPHERIC OBSERVATIONS AND ANALYSIS IN SUPPORT OF GHG EMISSION MITIGATION – EXAMPLE PROJECTS OF THE GAW IG³IS PROGRAMME

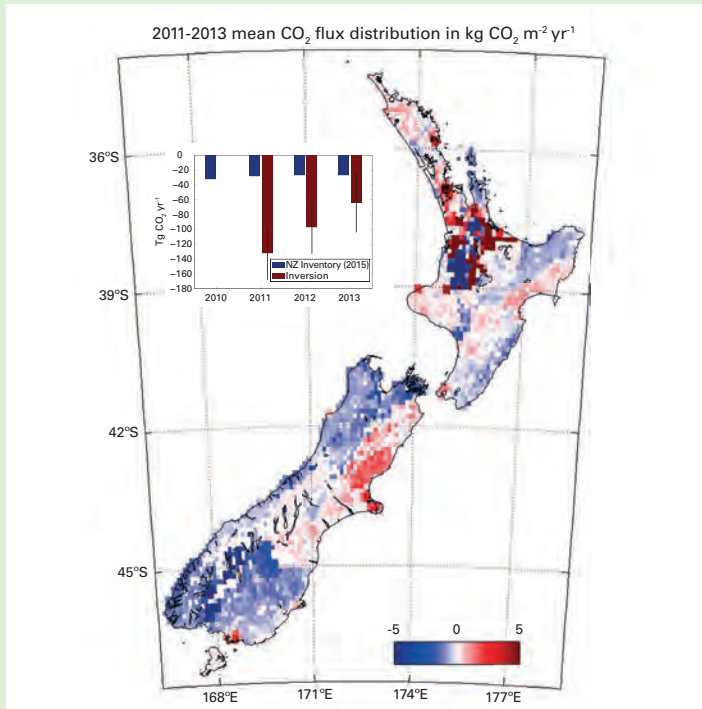


Figure 8. Geographic distribution of land-to-air CO₂ flux, averaged over 2011–2013 [10]. Blue and red regions indicate net carbon uptake and release, respectively. Per-area ocean fluxes are too small to show on this scale. Fossil fuel emissions are included and reach up to 20 kg CO₂ m⁻² yr⁻¹ in a few grid cells (Auckland area). The colour scale is capped to focus on natural fluxes. Inset: annual mean inverse model results [12] compared to the National Greenhouse Gas Inventory Report.

1. Atmospheric measurements reveal strong forest carbon sink in New Zealand

By Sara Mikaloff-Fletcher (National Institute of Water and Atmospheric Research Ltd, New Zealand) and Jocelyn Turnbull (GNS Science, New Zealand)

Net CO₂ uptake from land use, land-use change and forestry currently offsets approximately 30% of New Zealand’s GHG emissions [10]. These land carbon sinks played a key role in meeting New Zealand’s past GHG emission targets under the United Nations Framework Convention on Climate Change (UNFCCC), and they are expected to be a major component of the nation’s strategy for future GHG mitigation. New Zealand’s National Inventory Report (NIR) estimates forest carbon uptake based on tree diameter and height measurements at a national network of study sites, and allometric equations that infer carbon mass from these measurements. This approach, which is required by current Intergovernmental Panel on Climate Change (IPCC) guidelines [11], has substantial uncertainty.

Atmospheric CO₂ observations and inverse model simulations [12], illustrated in Figure 8, suggest that New

Zealand’s forest carbon sink may far exceed estimates from the NIR [10] and land process models [12]. Furthermore, the atmospheric observations reveal significant interannual variability that is not detected by the NIR methodology. This study combined in situ observations of atmospheric CO₂ at a network of sites with a high-resolution atmospheric model. The spatial pattern of the sink suggests that much of this missing carbon uptake occurs in Fiordland, a high rainfall region dominated by indigenous forests. The research team of New Zealand is launching a new research programme to further evaluate the processes that drive this sink. Through close engagement with users in the carbon accounting, land management and policy communities, this nationally funded programme will support the IG³IS mission to provide a bridge between science and policy for GHG monitoring and emission estimation.

2. Use of atmospheric observations of greenhouse gases to inform the United Kingdom national inventory

By Alistair Manning (UK Met Office)

To support the emission estimates that follow the IPCC protocol (“bottom-up”) [11] and are reported annually to UNFCCC, the United Kingdom uses a completely independent method (“top-down”) [13] for informing on its GHG emission estimates. The method uses a combination of atmospheric observations and modelling, and the results are also reported annually in the United Kingdom National Inventory Report to UNFCCC. Significant differences in the emissions estimated utilizing the two approaches are used by the United Kingdom Government Department of Business, Energy and Industrial Strategy (BEIS) to identify areas worthy of further investigation.

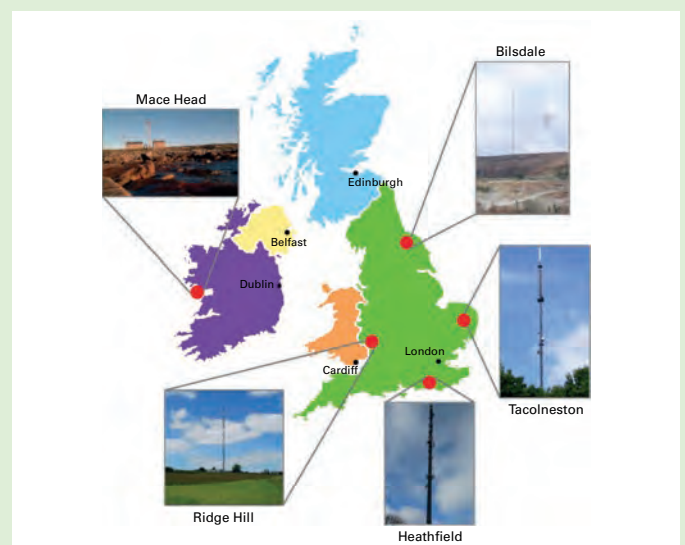


Figure 9. United Kingdom-funded DECC network of observation sites

3. Oil and gas methane emissions in Alberta, Canada: Collecting policy-relevant atmospheric data

By Daniel Zavala-Araiza (Environmental Defense Fund, United States of America)

The oil and gas sector in Canada accounts for roughly half of total CH₄ emissions in the national inventory [16]. The federal government recently announced regulations that support the goal of a 40–45% reduction of CH₄ emissions from the oil and gas system below 2012 levels by the year 2025 [17].

For emission reduction goals and policies to be realistically achieved, knowledge of the current emissions baseline as well as the characteristics of the major emitting sources is a necessary condition. Therefore, a multi-scale campaign, targeting oil and gas production regions in Alberta was conducted in the fall of 2016 [18–20] and the data were used to estimate the emissions (mass balance approach). These top-down estimates were then compared with spatially explicit, region-specific inventories and industry-reported emissions. In addition, ground-based mobile (downwind, site-wide characterization using dual tracer release and Gaussian dispersion modelling) measurements allowed the characterization of the emission distributions and major sources of emissions (see Figure 11a).

In the Lloydminster region of Alberta, the major source of emissions is related to direct venting of methane to the atmosphere from the production casing. The results based on atmospheric observations suggest that emissions are three to five times greater than inventories. This large discrepancy is particularly relevant in the context of proposed regulations and emission reduction policies in Canada. If these results are conservatively extrapolated to the larger population of similar sites in Alberta, actual methane emissions from oil and gas production in the province are likely to be 25–50% higher as illustrated in Figure 11b.

All the references in this section can be accessed in the extended version online at: <http://www.wmo.int/pages/prog/arep/gaw/ghg/ghg-bulletin14.html>.

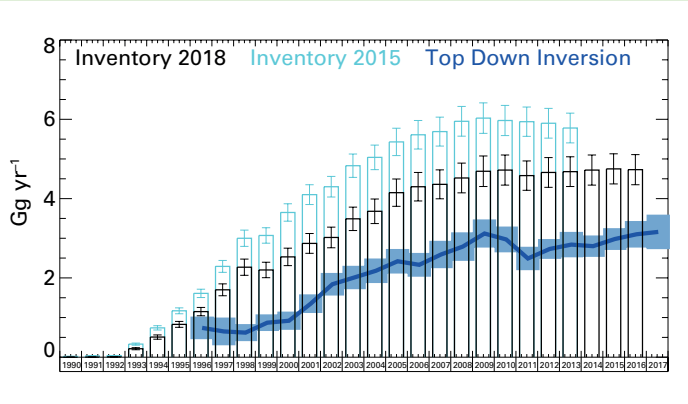


Figure 10. United Kingdom emission estimates of HFC-134a. Inventory estimates from two reporting years compared against top-down (InTEM) estimates.

In 2012, BEIS invested in a network of observation sites (Figure 9) called the UK Deriving Emissions related to Climate Change (DECC) network [14]. These are primarily tall-tower telecommunication masts equipped with state-of-the-art observation equipment measuring CO₂, CH₄, N₂O, HFCs, perfluorocarbons, SF₆ and nitrogen trifluoride (NF₃) to high precision and quality.

A recent example of how the top-down approach has been used to inform the bottom-up estimate is demonstrated in Figure 10. The country's 2015 bottom-up estimate for HFC-134a is shown in the figure as the light blue bars with an estimated uncertainty of 8%. The top-down estimate was consistently approximately 50% of this value throughout the time series from 1994, when the observations started, until 2013, the last year of that inventory. This result, and the subsequent work undertaken [15], motivated BEIS to investigate this further and an industry expert partly revised the United Kingdom HFC-134a inventory estimates.

The result of the revised bottom-up estimate is shown in Figure 10 as black bars – it has moved to be considerably nearer to the top-down estimates. The remaining discrepancy is believed to arise from the use of assumption on a refill rate.

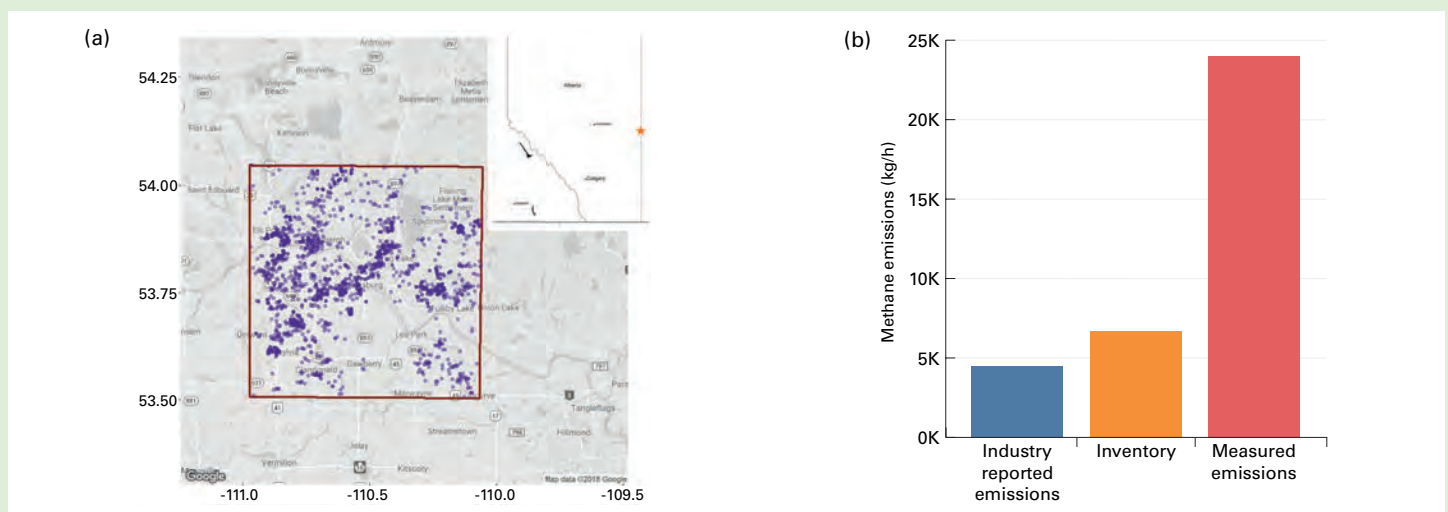


Figure 11. (a) Sampling region near Lloydminster, Alberta. The red box illustrates the source envelope where the aircraft took measurements. Purple dots inside the box represent active oil wells. (b) Comparison between measured CH₄ emissions and “bottom-up” estimates based on inventory and industry reports.

over the past decade and over the past five years. The pre-industrial level of 278 ppm represented a balance of fluxes among the atmosphere, the oceans and the land biosphere. Atmospheric CO₂ reached 146% of the pre-industrial level in 2017, primarily because of emissions from combustion of fossil fuels and cement production (the sum of CO₂ emissions was 9.9 ± 0.5 PgC⁽⁵⁾ in 2016 [8]), deforestation and other land-use change (1.3 ± 0.7 PgC average for 2007–2016). Of the total emissions from human activities during the period 2007–2016, approximately 44% accumulated in the atmosphere, 22% in the ocean and 28% on land; the unattributed budget imbalance is 5% [8]. The portion of CO₂ emitted by fossil fuel combustion that remains in the atmosphere (airborne fraction), varies inter-annually due to the high natural variability of CO₂ sinks without a confirmed global trend.

The globally averaged CO₂ mole fraction in 2017 was 405.5 ± 0.1 ppm (Figure 4). The increase in annual means from 2016 to 2017, 2.2 ppm, is smaller than the increase from 2015 to 2016 (3.2 ppm) and practically equal to the average growth rate for the past decade (2.24 ppm yr⁻¹). The higher growth rates in 2016 and 2015, in comparison with the years before 2016 and the increase from 2016 to 2017, are due in part to increased natural emissions of CO₂ related to the most recent El Niño event, as explained in the twelfth edition of this Bulletin.

Methane

Methane contributes approximately 17%⁽⁴⁾ of the radiative forcing by LLGHGs. Approximately 40% of methane is emitted into the atmosphere by natural sources (e.g., wetlands and termites), and about 60% comes from anthropogenic sources (e.g., ruminants, rice agriculture, fossil fuel exploitation, landfills and biomass burning). Atmospheric CH₄ reached 257% of the pre-industrial level (approximately 722 ppb) due to increased emissions from anthropogenic sources. Globally averaged CH₄ calculated from in situ observations reached a new high of 1859 ± 2 ppb in 2017, an increase of 7 ppb with respect to the previous year (Figure 5). This increase is lower than the increase from 2015 to 2016 but practically equal to the average annual increase over the past decade. The mean annual increase of CH₄ decreased

from approximately 12 ppb yr⁻¹ during the late 1980s to near zero during 1999–2006. Since 2007, atmospheric CH₄ has been increasing again. Studies using GAW CH₄ measurements indicate that increased CH₄ emissions from wetlands in the tropics and from anthropogenic sources at mid-latitudes of the northern hemisphere are likely causes of this recent increase.

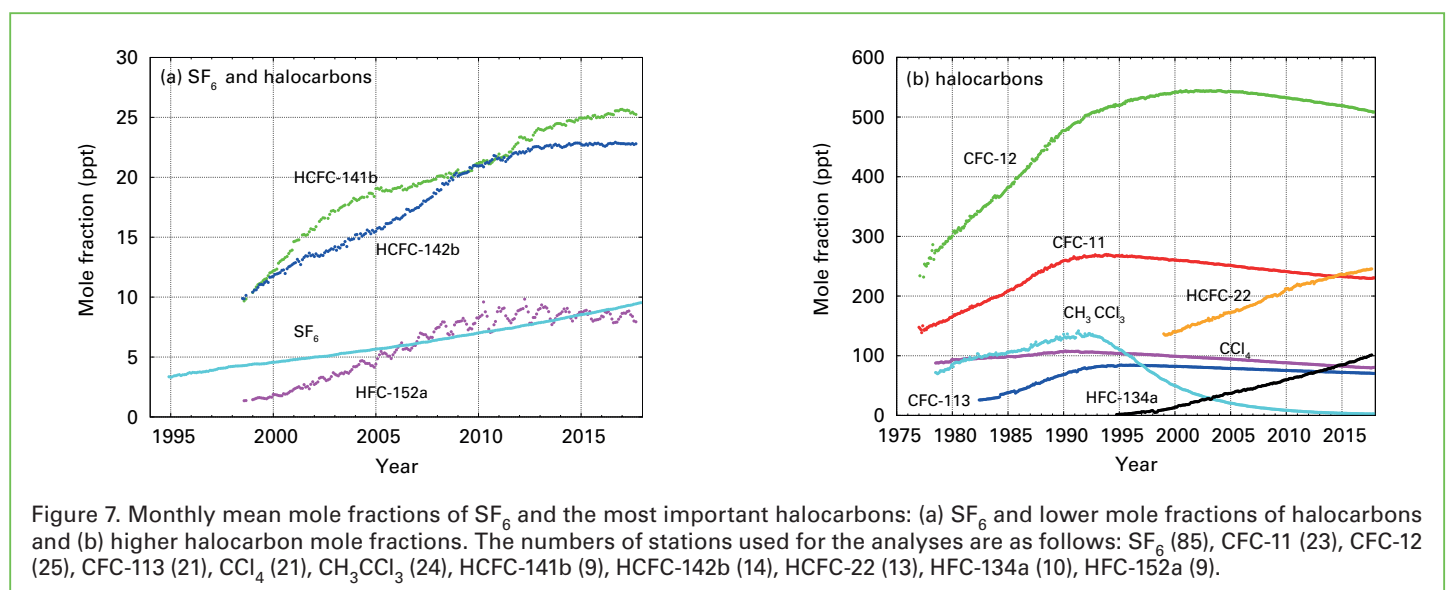
Nitrous oxide

Nitrous oxide contributes approximately 6%⁽⁴⁾ of the radiative forcing by LLGHGs. It is the third most important individual contributor to the combined forcing. N₂O is emitted into the atmosphere from both natural (about 60%) and anthropogenic sources (approximately 40%), including oceans, soils, biomass burning, fertilizer use and various industrial processes. The globally averaged N₂O mole fraction in 2017 reached 329.9 ± 0.1 ppb, which is 0.9 ppb above the previous year (Figure 6) and 122% of the pre-industrial level (270 ppb). The annual increase from 2016 to 2017 is higher than the increase from 2015 to 2016 and practically equal to the mean growth rate over the past 10 years (0.93 ppb yr⁻¹). The likely causes of N₂O increase in the atmosphere are an increased use of fertilizers in agriculture and increased release of N₂O from soils due to an excess of atmospheric nitrogen deposition related to air pollution.

Other greenhouse gases

Sulphur hexafluoride (SF₆) is a potent LLGHG. It is produced by the chemical industry, mainly as an electrical insulator in power distribution equipment. Its current mole fraction is more than twice the level observed in the mid-1990s (Figure 7a). The stratospheric ozone-depleting CFCs, together with minor halogenated gases, contribute approximately 11%⁽⁴⁾ of the radiative forcing by LLGHGs. While CFCs and most halons are decreasing, some hydrochlorofluorocarbons (HCFCs) and hydrofluorocarbons (HFCs), which are also potent GHGs, are increasing at relatively rapid rates, although they are still low in abundance (at ppt⁽⁶⁾ levels).

This Bulletin primarily addresses LLGHGs. Relatively short-lived tropospheric ozone [9] has a radiative forcing comparable to that of the halocarbons. Many other pollutants,



such as carbon monoxide, nitrogen oxides and volatile organic compounds, although not referred to as GHGs, have small direct or indirect effects on radiative forcing. Aerosols (suspended particulate matter) are short-lived substances that alter the radiation budget. All gases mentioned herein, as well as aerosols, are monitored by the GAW Programme, with support from WMO Members and contributing networks.

Acknowledgements and links

Fifty-three WMO Members have contributed CO₂ and other GHG data to WDCGG. Approximately 41% of the measurement records submitted to WDCGG were obtained at sites of the NOAA Earth System Research Laboratory cooperative air-sampling network. For other networks and stations, see GAW Report No. 229. AGAGE also contributed observations to this Bulletin. Furthermore, the GAW observational stations that contributed data to this Bulletin, shown in Figure 2, are included in the list of contributors on the WDCGG web page (<https://gaw.kishou.go.jp/>). They are also described in the GAW Station Information System (<https://gawsis.meteoswiss.ch/>) supported by MeteoSwiss.

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(1) Mole fraction = the preferred expression for abundance (concentration) of a mixture of gases or fluids. In atmospheric chemistry it is used to express the concentration as the number of moles of a compound per mole of dry air.

(2) ppm = number of molecules of the gas per million (10⁶) molecules of dry air.

(3) ppb = number of molecules of the gas per billion (10⁹) molecules of dry air.

(4) This percentage is calculated as the relative contribution of the mentioned gas(es) to the increase in global radiative forcing caused by all LLGHGs since 1750.

(5) 1 PgC = 1 petagram (10¹⁵ gram) of carbon.

(6) ppt = number of molecules of the gas per trillion (10¹²) molecules of dry air.

The Integrated Carbon Observation System (ICOS) atmosphere network



The ICOS atmosphere station network: yellow dots are combined atmosphere/ecosystem stations, red dots only observe the atmosphere. Not shown are the stations in French Guyana, La Reunion and Cabo Verde. Some example stations are: Pallas (Finland), Jungfrauoch (Switzerland), Svartberget (Sweden), Lampedusa (Italy).

Since mid-2018, the European atmosphere station network of the ICOS Research Infrastructure (<https://www.icos-ri.eu>) is a GAW-contributing network consisting of 33 stations (of which 22 are tall towers). Many ICOS atmosphere stations have already been in operation a long time, but ICOS has now also been extended into new regions and with new sites. ICOS has developed community-defined standardized measurement designs and protocols that for atmospheric GHG observations build and extend upon the WMO recommendations with regards to compatibility, calibration to WMO mole fraction scales and transparency of the data lifecycle. All ICOS stations have to meet the agreed standards. All data are processed by the ICOS Atmosphere Thematic Centre and checked and annotated on a daily basis by the responsible station managers. The Central Analytical Laboratories perform analyses of flask samples, e.g. for $^{14}\text{CO}_2$ radiocarbon detection of fossil fuel emissions, and provide all stations with WMO scale calibrated working standards. All fully quality-controlled ICOS atmosphere data are published as open data through the ICOS Carbon Portal (<https://data.icos-cp.eu/portal>) and are updated currently about twice per year. Near-real-time data, utilizing automatic quality control, are published with a maximum delay of one day from the time of the last final full quality-controlled release onwards. The atmospheric data will also be accessible through WDCGG, are part of the regular updates of the NOAA Obspack data products, and are delivered on a daily basis to the COPERNICUS services (<http://www.copernicus.eu/main/overview>).

Research vessel I (RVI) *Investigator*, the first mobile station in the GAW network

The RV *Investigator* of the Australian Marine National Facility has two dedicated atmospheric sampling laboratories providing continuous, high-quality, in situ measurements of CO_2 , CH_4 and N_2O along with other important trace gases such as carbon monoxide, tropospheric ozone and radon. A wide range of aerosol and meteorological parameters are also measured. In 2018, the *Investigator* became the first mobile station in the GAW network.

The *Investigator* sails 300 days a year in the waters around Australia, voyaging from the Equator to the Antarctic ice edge, perpetually collecting atmospheric composition data from highly under-sampled parts of the atmosphere. During its frequent voyages through the remote Southern Ocean, this new GAW station is providing insight into the closest analogue we have to a pristine or undisturbed atmosphere. This new understanding is invaluable for improving climate models.



The RV *Investigator* steams past a colossal iceberg in the Southern Ocean.

CSIRO

Top 20 Largest California Wildfires

	FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1	MENDOCINO COMPLEX <i>(Under Investigation)</i>	July 2018	Colusa County, Lake County, Mendocino County & Glenn County	459,123	280	1
2	THOMAS <i>(Under Investigation)</i>	December 2017	Ventura & Santa Barbara	281,893	1,063	2
3	CEDAR <i>(Human Related)</i>	October 2003	San Diego	273,246	2,820	15
4	RUSH <i>(Lightning)</i>	August 2012	Lassen	271,911 CA / 43,666 NV	0	0
5	RIM <i>(Human Related)</i>	August 2013	Tuolumne	257,314	112	0
6	ZACA <i>(Human Related)</i>	July 2007	Santa Barbara	240,207	1	0
7	CARR <i>(Human Related)</i>	July 2018	Shasta County, Trinity County	229,651	1,604	7
8	MATILIJA <i>(Undetermined)</i>	September 1932	Ventura	220,000	0	0
9	WITCH <i>(Powerlines)</i>	October 2007	San Diego	197,990	1,650	2
10	KLAMATH THEATER COMPLEX <i>(Lightning)</i>	June 2008	Siskiyou	192,038	0	2
11	MARBLE CONE <i>(Lightning)</i>	July 1977	Monterey	177,866	0	0
12	LAGUNA (POWERLINES)	September 1970	San Diego	175,425	382	5
13	BASIN COMPLEX <i>(Lightning)</i>	June 2008	Monterey	162,818	58	0
14	DAY FIRE <i>(Human Related)</i>	September 2006	Ventura	162,702	11	0
15	STATION <i>(Human Related)</i>	August 2009	Los Angeles	160,557	209	2
16	CAMP FIRE (Under Investigation)*	November 2018	Butte	153,336	18,804	85
17	ROUGH <i>(Lightning)</i>	July 2015	Fresno	151,623	4	0
18	McNALLY <i>(Human Related)</i>	July 2002	Tulare	150,696	17	0
19	STANISLAUS COMPLEX <i>(Lightning)</i>	August 1987	Tuolumne	145,980	28	1
20	BIG BAR COMPLEX <i>(Lightning)</i>	August 1999	Trinity	140,948	0	0

* Fire totals are likely to change.

*There is no doubt that there were fires with significant acreage burned in years prior to 1932, but those records are less reliable, and this list is meant to give an overview of the large fires in more recent times.

**This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, or local responsibility.



Top 20 Deadliest California Wildfires

FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1* Camp Fire (<i>Under Investigation</i>)	November 2018	Butte County	153,336	18,804	85
2 GRIFFITH PARK (<i>Unknown</i>)	October 1933	Los Angeles	47	0	29
3 TUNNEL - Oakland Hills (<i>Rekindle</i>)	October 1991	Alameda	1,600	2,900	25
4 TUBBS (<i>Under Investigation</i>)	October 2017	Napa & Sonoma	36,807	5,643	22
5 CEDAR (<i>Human Related</i>)	October 2003	San Diego	273,246	2,820	15
6 RATTLESNAKE (<i>Arson</i>)	July 1953	Glenn	1,340	0	15
7 LOOP (<i>Unknown</i>)	November 1966	Los Angeles	2,028	0	12
8 HAUSER CREEK (<i>Human Related</i>)	October 1943	San Diego	13,145	0	11
9 INAJA (<i>Human Related</i>)	November 1956	San Diego	43,904	0	11
10 IRON ALPS COMPLEX (<i>Lightning</i>)	August 2008	Trinity	105,855	10	10
11 REDWOOD VALLEY (<i>Under Investigation</i>)	October 2017	Mendocino	36,523	544	9
12 HARRIS (<i>Under Investigation</i>)	October 2007	San Diego	90,440	548	8
13 CANYON (<i>Unknown</i>)	August 1968	Los Angeles	22,197	0	8
14 CARR (<i>Human Related</i>)	July 2018	Shasta County, Trinity County	229,651	1,604	8
15 ATLAS (<i>Under Investigation</i>)	October 2017	Napa & Solano	51,624	781	6
16 OLD (<i>Human Related</i>)	October 2003	San Bernardino	91,281	1,003	6
17 DECKER (<i>Vehicle</i>)	August 1959	Riverside	1,425	1	6
18 HACIENDA (<i>Unknown</i>)	September 1955	Los Angeles	1,150	0	6
19 ESPERANZA (<i>Arson</i>)	October 2006	Riverside	40,200	54	5
20 LAGUNA (<i>Powerlines</i>)	September 1970	San Diego	175,425	382	5

* Fires are uncontained and totals are likely to change.

** Fires with the same death count are listed by most recent. Several fires have had 4 fatalities, but only the most recent are listed.

***This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, or local responsibility.



12/4/2018

Top 20 Most Destructive California Wildfires

FIRE NAME (CAUSE)	DATE	COUNTY	ACRES	STRUCTURES	DEATHS
1* Camp Fire (<i>Under Investigation</i>)	November 2018	Butte County	153,336	18,804	85
2 TUBBS (<i>Under Investigation</i>)	October 2017	Napa & Sonoma	36,807	5,636	22
3 TUNNEL - Oakland Hills (<i>Rekindle</i>)	October 1991	Alameda	1,600	2,900	25
4 CEDAR (<i>Human Related</i>)	October 2003	San Diego	273,246	2,820	15
5 VALLEY (<i>Electrical</i>)	September 2015	Lake, Napa & Sonoma	76,067	1,955	4
6 WITCH (<i>Powerlines</i>)	October 2007	San Diego	197,990	1,650	2
7 CARR (<i>Human Related</i>)	July 2018	Shasta County, Trinity County	229,651	1,604	8
8 NUNS (<i>Under Investigation</i>)	October 2017	Sonoma	54,382	1,355	3
9 THOMAS (<i>Under Investigation</i>)	December 2017	Ventura & Santa Barbara	281,893	1,063	2
10 OLD (<i>Human Related</i>)	October 2003	San Bernardino	91,281	1,003	6
11 JONES (<i>Undetermined</i>)	October 1999	Shasta	26,200	954	1
12 BUTTE (<i>Powerlines</i>)	September 2015	Amador & Calaveras	70,868	921	2
13 ATLAS (<i>Under Investigation</i>)	October 2017	Napa & Solano	51,624	783	6
14 PAINT (<i>Arson</i>)	June 1990	Santa Barbara	4,900	641	1
15 FOUNTAIN (<i>Arson</i>)	August 1992	Shasta	63,960	636	0
16 SAYRE (<i>Misc.</i>)	November 2008	Los Angeles	11,262	604	0
17 CITY OF BERKELEY (<i>Powerlines</i>)	September 1923	Alameda	130	584	0
18 HARRIS (<i>Under Investigation</i>)	October 2007	San Diego	90,440	548	8
19 REDWOOD VALLEY (<i>Under Investigation</i>)	October 2017	Mendocino	36,523	546	9
20 BEL AIR (<i>Undetermined</i>)	November 1961	Los Angeles	6,090	484	0

* Fires are uncontained and totals are likely to change.

***"Structures" include homes, outbuildings (barns, garages, sheds, etc) and commercial properties destroyed.

***This list does not include fire jurisdiction. These are the Top 20 regardless of whether they were state, federal, or local responsibility.



2018 PROGRESS REPORT

California's Sustainable Communities and Climate Protection Act



NOVEMBER 2018



Electronic copies of this document can be found on CARB's website at

<http://www.arb.ca.gov/cc/sb375/sb375.htm>

and

<https://ww2.arb.ca.gov/legislatively-mandated-reports>

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Metropolitan Planning Organizations

Association of Monterey Bay Area Governments

Butte County Association of Governments

Fresno Council of Governments

Kern Council of Governments

Kings County Association of Governments

Madera County Transportation Commission

Merced County Association of Governments

Metropolitan Transportation Commission / Association of Bay Area Governments

Sacramento Area Council of Governments

San Diego Association of Governments

San Joaquin Council of Governments

San Luis Obispo Council of Governments

Santa Barbara County Association of Governments

Shasta Regional Transportation Agency

Southern California Association of Governments

Stanislaus Council of Governments

Tahoe Metropolitan Planning Organization

Tulare County Association of Governments

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Abbreviations

AMBAG	Association of Monterey Bay Area Governments
AB	Assembly Bill
AHSC	Affordable Housing and Sustainable Communities
AV	Automated Vehicles
BCAG	Butte County Association of Governments
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCI	California Climate Investment Program
CDTFA	California Department of Tax and Fee Administration
CEC	California Energy Commission
CO ₂	Carbon Dioxide
CPUC	California Public Utilities Commission
CTC	California Transportation Commission
FCOG	Fresno Council of Governments
FMRP	Future Mobility Research Program
HCD	California Department of Housing and Community Development
HPMS	Highway Performance Monitoring System
HQTA	High-Quality Transit Areas
KCAG	Kings County Association of Governments
KCOG	Kern Council of Governments
MAP for Healthy Communities	State Mobility Action Plan for Healthy Communities
MCAG	Merced County Association of Governments
MCTC	Madera County Transportation Commission
MPO	Metropolitan Planning Organization
MTC/ABAG	Metropolitan Transportation Commission/Association of Bay Area Governments
OPR	Governor's Office of Planning and Research
RTP	Regional Transportation Plan
SACOG	Sacramento Area Council of Governments
SALC	Sustainable Agricultural Land Conservation
SANDAG	San Diego Association of Governments
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SCAG	Southern California Association of Governments

SCS	Sustainable Communities Strategy
SEAM/SEAT	Social Equity Analysis Methodology and Tool
SJCOG	San Joaquin Council of Governments
SLOCOG	San Luis Obispo Council of Governments
SRTA	Shasta County Regional Transportation Planning Agency
StanCOG	Stanislaus Council of Governments
TCAG	Tulare County Association of Governments
TCC	Transformative Climate Communities
TIP	Transportation Improvement Program
TMPO	Tahoe Metropolitan Planning Organization
TNC	Transportation Network Company
VMT	Vehicle Miles Traveled
ZEV	Zero Emission Vehicles

Executive Summary

In 2008, the California Legislature passed the [Sustainable Communities and Climate Protection Act of 2008, Senate Bill \(SB\) 375](#)¹ as a first-of-its-kind law to recognize the critical role of integrated transportation, land use, and housing decisions to meet state climate goals. The law requires each of California's 18 regional Metropolitan Planning Organizations (MPOs) to include a new element in their long-range regional transportation plans – a Sustainable Communities Strategy (SCS). In the SCS, the MPO, in partnership with their local member agencies and the State, identifies strategies to reduce greenhouse gas emissions from driving, which can also foster healthier and more equitable and sustainable communities. Under SB 375, MPOs have spent almost 10 years engaged in planning and developing SCSs tailored to each region that outline multiple benefits for public health, the environment, social justice, and access to opportunities, if implemented.

Recognizing the importance of realizing and measuring the benefits identified through this SB 375 planning work, in 2017, the Legislature tasked the California Air Resources Board (CARB) with issuing a report every four years analyzing the progress made under SB 375 pursuant to SB 150 (Allen, Chapter 646, Statutes of 2017). SB 150 tasks CARB with preparing a report that assesses progress made toward meeting the regional SB 375 greenhouse gas emissions reduction targets, and to include data-supported metrics for strategies utilized to meet the targets. The report is also required to include a discussion of best practices and challenges faced by MPOs in meeting the targets, including the effect of state policies and funding.

This report is the first in the series that responds to that legislation and includes the fundamental finding that California is not on track to meet greenhouse gas reductions expected under SB 375. This finding is based on CARB's analysis of 24 data-supported indicators to help assess what on-the-ground change has occurred since SB 375 was enacted related to strategies identified in SCSs to meet the targets (e.g., travel patterns, funding for high-quality transit and making communities safe and convenient for walking and cycling, and building homes at all income levels near jobs and other opportunities). CARB also includes a discussion of 68 best practices and 8 challenge areas for SCS implementation that were identified through consultation with MPOs and other affected stakeholders.

In addition to these required reporting elements, CARB incorporates suggestions on ways to overcome the 8 SCS implementation challenges identified in this report. When interviewing MPOs and affected stakeholders for this report, CARB consistently heard concerns over the continued pervasive and longstanding disconnect between the factors that shape regional growth and development in California – such as transportation investment, regulatory and housing market conditions at the local,

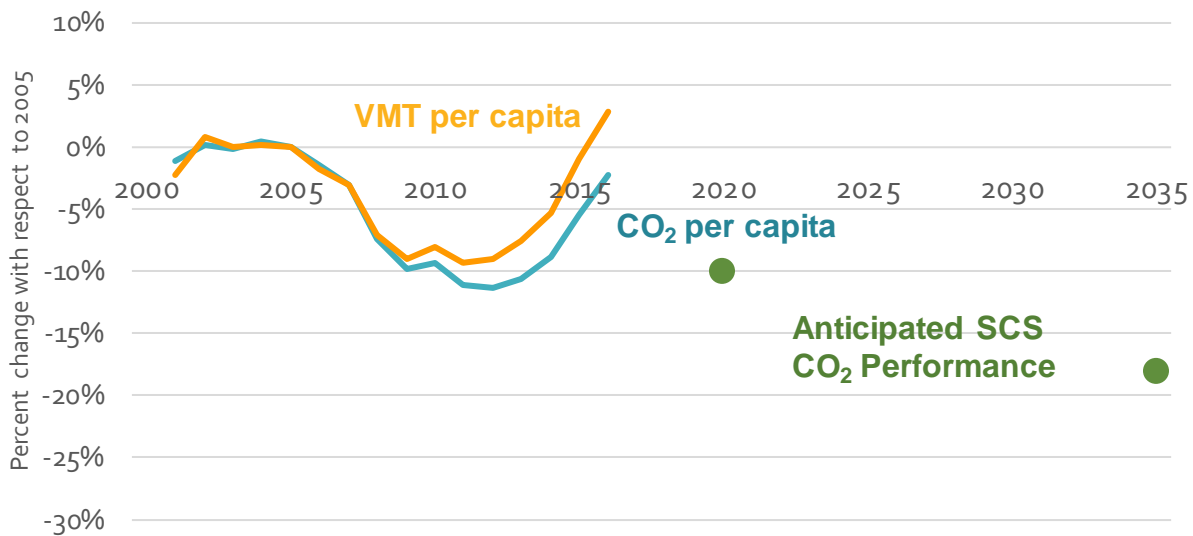
¹ SB 375 (Steinberg, Chapter 728, Statutes of 2008).

regional, and state levels – and the state’s environmental, equity, climate, health, economic, and housing goals. While positive gains have been made to improve the alignment of transportation, land use, and housing policies with state goals, the data suggest that more and accelerated action is critical for public health, equity, economic, and climate success. SB 375 focused its efforts on MPOs and initiating change in the way planning for growth and travel occurs, but structural changes and additional work by all levels of government are still needed to implement what regions have identified to be needed strategies. While no single agency or level of government alone bears the responsibility for this work; there is an important opportunity to partner across many agencies, with regional and local government staff and elected officials, and with communities on taking collaborative action toward better results.

CALIFORNIA IS NOT ON TRACK TO MEET GREENHOUSE GAS REDUCTIONS EXPECTED UNDER SB 375 – MORE NEEDS TO BE DONE

A key finding of this report is that California is not on track to meet the greenhouse gas reductions expected under SB 375 for 2020, with emissions from statewide passenger vehicle travel per capita increasing and going in the wrong direction as shown in the figure below.

Statewide CO₂ and Vehicle Miles Traveled (VMT) Per Capita Trend with Respect to Anticipated Performance of Current SB 375 SCSs²



Source: CDTFA, U.S.EIA, U.S.EPA, CARB

² CO₂ and VMT calculated based on California Department of Tax and Fee Administration (CDTFA) gasoline fuel sales data.

While overall, California has hit its 2020 climate target ahead of schedule due to strong performance in the energy sector, meeting future targets will require a greater contribution from the transportation sector. With emissions from the transportation sector continuing to rise despite increases in fuel efficiency and decreases in the carbon content of fuel, California will not achieve the necessary greenhouse gas emissions reductions to meet mandates for 2030 and beyond

without significant changes to how communities and transportation systems are planned, funded, and built. Specifically, CARB's *2030 Scoping Plan Update*³ identifies reduction in growth of single-occupancy vehicle travel as necessary to achieve the statewide target of 40 percent below 1990 level emissions by 2030. Even more will be needed to achieve Governor Brown's new carbon neutrality goal by 2045.⁴

Lack of progress to date puts California at risk of not achieving the important public health, equity, economic, mobility, housing, and other benefits that SB 375 SCSs are expected to deliver.

This lack of progress to date also puts California at risk of not achieving the important public health, equity, economic, mobility, housing, and other benefits that SB 375 SCSs are expected to deliver. The vision for how a region will grow, as embodied in the SCSs, and whether those visions ultimately are implemented will shape the daily lives of Californians both today and for generations to come.

Historic patterns of growth continue to shape the state today. While California has grown to be the fifth largest economy in the world, with world-class cities and thriving communities, its residents, in search of an affordable place to live, and with insufficient transportation options, are too often left with little choice but to spend significant time and money driving from place to place. The way we grow also imposes and often reinforces long-standing racial and economic injustices by placing a disproportionate burden on low-income residents, who end up paying the highest proportion of their wages for housing and commuting. These residents also often live in communities with the most health impacts from lack of active transportation infrastructure and transportation pollution. The greatest burden of health impacts in the state are from

³ California Air Resources Board. November 2017. *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. Retrieved from https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

⁴ Executive Order B-55-18. September 2018. <https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>.

chronic diseases related to lack of physical activity, which would be significantly improved by more walking, cycling, and public transit use.^{5,6,7}

In this way, growth patterns have a profound impact on both the health of individuals and the environment. Where jobs are located and homes are built, and what roads, bike lanes, and transit connect them, create the fabric of life. How regions grow impacts where people can afford to live, how long it takes to get to work, how people travel, who has easy access to well-paying jobs and educational opportunities, the air people breathe, whether it is easy to spend time outdoors and with friends, social cohesion and civic engagement, and ultimately, how long people live.

CHALLENGES IN MEETING SB 375 TARGETS AND WAYS TO OVERCOME THOSE CHALLENGES

California – at the state, regional, and local levels – has not yet gone far enough in making the systemic and structural changes to how we build and invest in communities that are needed to meet state climate goals. To meet the potential of SB 375 will require state, regional, and local agency staff and elected officials to make more significant changes across multiple systems that address the interconnected relationship of land use, housing, economic and workforce development, transportation investments, and travel choices.

Some positive changes have already occurred. Over the last decade, efforts have been made to better align state climate and transportation funding with sustainable communities goals. This includes implementation of a number of transportation and sustainable communities focused California Climate Investments programs funded with cap-and-trade auction proceeds. It also includes gains in statewide transit and rail investment, which has risen, both for operations and capital, through investments in high-speed rail, Road Repair and Accountability Act of 2017 (SB 1) transit funding, and some recent local measures with transit components. At the regional level, transportation investment plans are showing more funding for walking and cycling in some regions, as well as some shift within road expenditures toward road maintenance over road expansion and toward managed or high-occupancy vehicle lanes over general-purpose lanes.

Yet many challenges continue to impede the changes that will be needed to meet the targets. For example, the portion of commuters driving alone to work instead of

⁵ California Department of Public Health. 2013. *The Burden of Chronic Disease and Injury*. Retrieved from: https://www.cdph.ca.gov/Programs/CCDPHP/DCDIC/CDCB/CDPH%20Document%20Library/BurdenReport04-04-13_ADA.pdf.

⁶ See also the National Center for Health Statistics' "Stats of the State of California" data available at: <https://www.cdc.gov/nchs/pressroom/states/california/california.htm>.

⁷ California Department of Public Health. August 2017. *Increasing Walking, Cycling, and Transit: Improving Californians' Health, Saving Costs, and Reducing Greenhouse Gases*. 2017. Retrieved from: <https://www.cdph.ca.gov/Programs/OHE/CDPH%20Document%20Library/Maizlish-2016-Increasing-Walking-Cycling-Transit-Technical-Report-rev8-17-ADA.pdf>.

carpooling, taking transit, walking or cycling is rising in almost every region. The supply of housing in many regions is a small fraction of the need, particularly homes affordable to low-income communities, which is contributing to lengthening commutes. The overall ratio of dollars planned to be spent on roads versus on infrastructure for other modes in the largest regions of California has shown remarkably little shift. The changes that have been made so far are clearly not of the magnitude necessary to have yet had a significant impact on these challenges.

CARB interviewed a number of transportation and land use planners and stakeholders to better understand these challenges and what could be done to overcome them. Through these interviews, CARB identified many regional best practices that exemplify innovative MPO approaches in using transportation dollars to support housing, land use, accessibility, transit, and active transportation goals, partnering with local jurisdictions on delivering alternative mode plans and projects, and more (see Appendix C).

On the whole, however, CARB finds that structural changes and additional work by all levels of government are still necessary to achieve state climate goals and other expected benefits. Staff and elected officials of local, subregional, regional, and state government bodies all have critical authorities and roles to contribute and could take steps to improve the outcomes now, via robust implementation of existing and emerging tools as well as enacting new policy. But so far, all – acting rationally within the state’s current structure of incentives, political forces, and policy restrictions – have not been able to enact the magnitude of change needed. As this report’s findings suggest, the state’s current structure of policies and lack of incentives will continue to produce and exacerbate the

WHAT THE DATA SHOW

TRANSPORTATION

In California’s four largest regions, the proportion of overall transportation spending planned by mode remained nearly the same. The portion of people driving alone to work rose or stayed the same in most regions.

HOUSING

Housing construction and permitting are significantly behind needs. Jobs/housing imbalances are increasing in many regions. Housing cost burdens have increased in every region.

LAND DEVELOPMENT


The loss of agricultural land from 2000-2014 was highest in Southern California and the San Joaquin Valley. But community development patterns have led a high and increasing number of Californians to have fairly high accessibility to at least some of their daily needs, as most live near a full-service grocery store.

EQUITY

Over 45 percent of all California renters spend more than 35 percent of their income on housing. Low-income and communities of color are more likely to be overburdened by housing costs.

insufficient results outlined in this report unless shared responsibility, changes in authority or mandates and incentives, and strong, deliberate, collaborative action is taken by state, regional, and local policymakers to foster a policy environment that enhances the way we live, work, and travel.

To address these entrenched challenges, substantive changes are needed, with increased focus and leadership from the State, regional, and local agencies in close coordination.



CARB recommends that an interagency body involving the Secretaries and Chairs of key California agencies and Commissions, and representatives from regional and local governments produce and implement a new “State Mobility Action Plan for Healthy Communities” that responds to this report’s findings on challenges, opportunities, and data gaps.

The State Mobility Action Plan for Healthy Communities (MAP for Healthy Communities) should identify near- and long-term actions to help address the challenges identified in this report to increase and sustain progress toward the SB 375 targets. The MAP for Healthy Communities should identify (a) responsible parties at the state, regional, and local levels; (b) timelines for work on state policy, investment strategy, data and information collection and distribution; and (c) recommended improvements to state law, including, but not limited to any possible revisions needed to SB 375. The plan should be developed through a collaborative process with appropriate state agencies, regional and local leaders, industry experts, and the public. It should build upon key recent reports including *The Governor’s Environmental Goals and Policy Report*⁸ and CARB’s *2030 Scoping Plan Update*.⁹ It should also build upon the work of existing state interagency bodies that are equipped to address intersections of housing, transportation, and land use policy.

As a starting point, this report identifies eight priority challenge and opportunity areas for the MAP for Healthy Communities work.

⁸ Governor’s Office of Planning and Research. *A Strategy for California @ 50 Million: Supporting California’s Climate Change Goals - The Governor’s Environmental Goals and Policy Report*. November 2015. Retrieved from http://www.opr.ca.gov/docs/EGPR_Nov_2015.pdf.

⁹ In addition to the main body of the Scoping Plan, see also California Air Resources Board. November 2017. *Appendix C: Vibrant Communities and Landscapes and Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT)*. Retrieved from https://www.arb.ca.gov/cc/scopingplan/2030sp_appc_vmt_final.pdf.

1 **Improve the way the State targets transportation, housing, and climate-incentive funds to better align projects with state health, equity, economic, and environmental priorities.**

Over \$1.1 trillion will be spent on transportation over the life of current transportation plans alone – yet these spending plans are slow to align with key goals.

Identify, review, and revise relevant state transportation, housing, and climate-incentive funding guidelines and plans, and identify opportunities to: 1) link these funds to encourage equitable growth in housing and transportation that is better-aligned with state planning priorities for growth;¹⁰ 2) fund clean transportation options such as public transit, active transportation, new mobility innovations, and traveler incentives, particularly for low-income communities; 3) prepare for climate change by creating more resilient communities, infrastructure, and natural land; and 4) introduce requirements and local decision-support tools to support further review of projects that do not align with vehicle miles traveled, greenhouse gas emissions, and other health, equity, and conservation goals. Work on relevant state funding guidelines and plans could align with the joint meetings held between CARB and the California Transportation Commission to discuss coordination on SB 375 implementation, among other key transportation-related topics that began in 2018 pursuant to AB 179.¹¹

¹⁰ AB 857 (Wiggins, Chapter 1016, Statutes of 2002) established state planning priorities to promote infill development for people of all incomes, protect natural resources and farmland, and grow efficiently.

¹¹ AB 179 (Cervantes, Chapter 737, Statutes of 2017), directs CTC and CARB to hold at least two joint meetings per calendar year to coordinate implementation of transportation policies.

2 Improve incentives and legal certainty for projects that provide affordable housing choices near jobs, transit, and other high-opportunity locations.

Only about one-quarter of the affordable homes needed for low-income families have been built¹² – with homes especially needed near quality jobs, transit, and in healthy communities that offer other opportunities too.

Assess what additional incentive (e.g., resources for local planning, funding for enabling infrastructure, financing mechanisms for transit-oriented and transit-ready development, etc.), local decision-support tools, regulatory, and other legal mechanisms can be put in place to increase homes in high-opportunity areas for low-income households and to make it easier to build homes in places aligned with the state’s planning priorities, SCS goals, and Regional Housing Needs Allocation (RHNA) goals¹³ than elsewhere. One effort that can be built upon began this year (2018), with CARB and the Governor’s Office of Planning and Research working on guidance and evidence that developers and local jurisdictions can use to show how well-designed, transportation-efficient, and affordable projects comply with the California Environmental Quality Act and State greenhouse gas emissions reduction goals for housing development in California.

¹² This statistic includes Very Low- and Extremely Low-Income California renter households, using data from the 2016 National Low Income Housing Coalition tabulations of 2014 American Community Survey Public Use Microdata Sample (PUMS) housing file. See: California Department of Housing and Community Development. February 2018. *California’s Housing Future: Challenges and Opportunities. Final Statewide Housing Assessment 2025*. Retrieved from http://www.hcd.ca.gov/policy-research/plans-reports/docs/SHA_Final_Combined.pdf.

¹³ Gov. Code § 65584(d) and §65583(c)(5).

3 Develop a state vision for increasing travel choices, economic development, and access to jobs and other opportunities, as well as affordable housing for under-served communities – and by doing so, accelerate progress toward state climate, infill, health, and equity benefits.

A healthy place to live and basic mobility are human rights, and the inequity is clear when life expectancy between neighboring communities differs by 20 years. A new multi-stakeholder solutions-oriented approach must emerge that breaks through historical silos.

Develop a state vision and strategy for advancing equity and reversing historic and systemic injustices, including health inequities that result in significant health disparities between populations,^{14,15} via state transportation, housing, climate and air quality outreach, planning, and funding. Development of a state equity strategy for the areas identified above should balance state planning priorities for growth¹⁶ and public health considerations, incorporate considerations from a review of best practices and cutting-edge efforts nationwide, as well as the input of communities directly. The strategy should outline ways to monitor progress and advance state climate goals, as well as identify where development of local decision-support tools would be useful. Finally, special attention should be paid to strategies that help prevent the displacement of low-income communities and communities of color. Strategy development must expand upon CARB and other agencies' efforts to promote low-income

¹⁴ Life expectancy in the San Joaquin Valley varies by zip code by 21 years. Source: Joint Center for Political and Economic Studies; Fresno State's Central Valley Health Policy Institute. 2012. *Place Matters for Health in the San Joaquin Valley: Ensuring Opportunities for Good Health for All*. Retrieved from <https://jointcenter.org/sites/default/files/PM%20English.pdf>.

¹⁵ "Health equity" is defined as efforts to ensure that all people have full and equal access to opportunities that enable them to lead healthy lives. "Health disparities" are the differences in health and mental health status among distinct segments of the population, including differences that occur by gender, age, race or ethnicity, sexual orientation, gender identity, education or income, disability or functional impairment, or geographic location, or the combination of any of these factors. "Health inequities" are defined as disparities in health or mental health, or the factors that shape health, that are systemic and avoidable and, therefore, considered unjust or unfair. Source: *Portrait of Promise: The California Statewide Plan to Promote Health and Mental Health Equity. A Report to the Legislature and the People of California by the Office of Health Equity*. Sacramento, CA: California Department of Public Health, Office of Health Equity; August 2015. Retrieved from http://www.ochealthieretogether.org/content/sites/ochca/CDPH_Portrait_of_Promise_Aug_2015.pdf.

¹⁶ AB 857 (Wiggins, Chapter 1016, Statutes of 2002).

communities' access to clean transportation and mobility options and to reduce exposure to air pollution in disproportionately-burdened communities.^{17,18}

4 Pilot test innovative ideas to speed the adoption of clean, efficient transportation solutions across the state.

We all need to be asking – (1) What strategies will deliver positive transportation outcomes in the next five years? (2) How can we shift travel behavior now?

Promote the use of pilot projects that bring together innovators, technical experts, community members, and decision-making partners to find creative solutions for accelerating a change in travel choices away from single-occupancy vehicles while improving accessibility and access to opportunity, particularly for low-income communities. Outline a plan to initiate pilot projects and to publish their results, lessons learned, and how they can be more widely deployed throughout California. Pilot projects might test which incentives best motivate travelers to shift to more sustainable travel modes; provide real-time consumer information; develop strategies for making the traveler experience outside of the single-occupancy vehicle more seamless; explore enhancements to transit operations; and/or better integrate walking, cycling, transit, and carpool options via mobility hubs or other approaches.

¹⁷ SB 350 (de León, Chapter 547, Statutes of 2015).

¹⁸ AB 617 (C. Garcia, Chapter 136, Statutes of 2017).

5 Develop fiscally-sustainable and equitable methods of funding the transportation system, in ways that increase climate-friendly travel choices for everyone.

Changing the structure of costs people incur to access the transportation system provides an opportunity to more equitably and sustainably increase transportation choices, reduce congestion, and fund the transportation system as a whole.

Pair efforts to increase transportation choices with efforts to fund the transportation system more equitably and sustainably, in a manner that aligns with environmental and health goals and that reduces congestion for those who still need to drive. Funding from pricing tools could be used to implement or fund pilot tests of strategies for improving transportation efficiency, such as shuttles, enhanced transit service, pooling facilitated by ride-hailing, protected bike lanes, and bike- and scooter-sharing, possibly to make travel easier in key zones that are currently highly congested, such as urban downtowns. Other financial incentives could be deployed more broadly as well, such as lower-cost transit passes, parking pricing, per-mile car insurance pricing options, and pricing structures for Transportation Network Companies (TNCs) that encourage carpooling and traveling at lower-demand times.

6 Complement deployment of new mobility options and technologies with policies supporting state environmental and equity priorities.

New mobility options offer a great opportunity to reduce driving while expanding overall access to destinations, but only with the right supporting policies in place.

Convene a transportation system think tank to provide insight into the demands on the future transportation system (e.g., further system electrification, new mobility options and technologies, such as ride-hailing and automated vehicles and the economics of those technologies). The group should also identify the transformative technologies, solutions, partnerships, and critical steps to meet those demands, in a way that provides clear environmental benefits and fosters greater livability, access to destinations, and compact infill development rather than accelerating sprawl. To address one facet of new mobility, CARB began work this year (2018) to assess possible regulatory

approaches to ensure greater inclusion of zero emission vehicles in public and private light- and heavy-duty vehicle fleets, including emerging new mobility services such as ride-hailing fleets with emphasis on pooling and connections to transit. At the same time, the State has initiated a Multi-agency Workgroup on Automated Vehicles to address deployment of connected and automated vehicles in California. SB 1014¹⁹ now directs CARB, the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) to foster the use of cleaner cars and more carpooling in ride-hailing trips and directs CARB to set goals for reducing the greenhouse gas emissions per passenger-mile traveled, including targets for the use of zero emission vehicles.

7 Improve and increase access to data to assist with planning and monitoring success of state policies in meeting transportation, housing, health, and environmental goals.

“If you cannot measure it, you cannot improve it.”

Develop a research and monitoring plan to fill data gaps and allow more comprehensive tracking of progress in each of the efforts identified here. Going forward, to address state goals more holistically, more and different types of data than what has historically been tracked are needed. In preparing this report, CARB documented numerous gaps in our ability to track key metrics in areas related to public health, social justice, economic opportunity, accessibility to daily needs, and natural resource values. Pages 37, 48, and 55 highlight priority data and information gaps that should be addressed.

¹⁹ SB 1014 (Skinner, Chapter 369, Statutes of 2018).

8 Update and strengthen SB 375 to better connect state climate, transportation, health, equity, and conservation goals with regional and local planning, and to improve implementation.

Improving implementation also means doing better on aligning state, regional, and local plans.

Develop recommendations to update SB 375 that better connect state goals and priorities with regional and local planning and implementation. While amending SB 375 alone will not solve the challenges outlined in this report, doing so can strengthen and make greater use of efforts underway in this area. Issues to consider: (1) Regional planning has many benefits and is a useful scale for examining multiple issues. While SB 375 provides regional climate-related planning targets, there are no associated state health, equity, and conservation planning goals for regional planning. Are there ways that state targets for climate and transportation, health, equity, and conservation, including those from documents such as the Scoping Plan and the California Transportation Plan, could be more directly addressed in regional plans?; and (2) Currently, SB 375 addresses planning horizon years of 2020 and 2035, but California's goals are urgent and extend beyond 2035. Should SB 375 regional planning timelines be amended to align with current state planning timelines, and reflect the importance of cumulative reductions?

Background

The California legislature passed the [Sustainable Communities and Climate Protection Act of 2008, Senate Bill \(SB\) 375, \(Chapter 728, Statutes of 2008\)](#), as a first-of-its-kind law to recognize the critical role of integrated land use, transportation, and housing decisions in order to meet State climate goals. The law requires each of California's regional Metropolitan Planning Organizations (MPOs), who develop long-range regional transportation plans (minimum of 20 years), to include a Sustainable Communities Strategy (SCS). In the SCS, the MPO identifies strategies to reduce greenhouse gas emissions from driving and to foster healthy, equitable, and sustainable communities.

Why Sustainable Communities Strategies Matter

State and regional partners have spent almost 10 years developing SCSs tailored to each region. The first round of SCSs for California's 18 regions is complete, and the second and third rounds of SCS planning and implementation are underway. Through

"My goal in authoring SB 375 was to change our transportation and land use patterns to encourage more compact development where people live close to jobs and enjoy a diversity of low-carbon mobility options, such as walking, biking, or transit. In doing so, we combat climate change, improve public health, and create more livable communities for all. Realizing the vision of SB 375 requires time and hard work. Ongoing monitoring to measure progress, identifying barriers to success, and implementing policies to overcome those barriers are key."

*- Mayor Darrell Steinberg
City of Sacramento*

this work, policymakers and stakeholders have found that the importance of SB 375 goes beyond its impact on climate. Integrating land use, transportation, and housing planning shapes residents' daily lives and can advance other regional goals – to preserve farmland and natural resources for future generations, save families money on housing and transportation, clean the air we breathe, provide opportunities for physical activity, and help people spend less time stuck in traffic and more time at home or play. The SCSs contain long-term actions that each region has identified to support these goals. These include policy actions to coordinate housing, jobs, and transportation

investments to expand the clean, reliable, and affordable transportation options (i.e., cycling, walking, pooling, and transit) that Californians can access for getting from place to place.

The Role of Carb in Monitoring SB 375 Implementation

Because SCSs are long-term plans covering multiple decades, a significant amount of effort to date has been spent looking forward and forecasting where California's regions might be in the future, while less effort has been spent looking back to assess progress. To assure future success, interim assessments must evaluate whether the strategies in the SCSs are being implemented, and how well they are working. With this information, policymakers can better understand if the state is on the right trajectory, and how to adjust course if not.

This report is the first of a series that CARB will prepare at least every four years to take stock of what progress has occurred under SB 375 to date, pursuant to SB 150 (Allen, Chapter 646, Statutes of 2017). Per the statute, CARB must assess each region's progress on achieving regional greenhouse gas emissions reduction targets. The report must include a description of the changes to greenhouse gas emissions in each region, data-supported metrics for the strategies utilized to meet the targets, as well as the challenges faced by the MPOs in meeting the targets, including the effect of State policies and funding. To this end, CARB's goal in preparing this inaugural progress report is two-fold: (1) to put forward the foundation for an effective monitoring and evaluation framework for the SB 375 program, and (2) to initiate a discussion about possible State and regional action that could overcome the challenges identified.

If we are going to meet California's bold climate goals, we must hold ourselves accountable. To do that effectively we need to understand our progress through active monitoring and real-time data, and be ready to make the changes needed to get us on target.

- Senator Ben Allen (D-26)

California Senate

About This Report

This report seeks to present policymakers and practitioners with relevant information to help determine if implementation of the SB 375 program is achieving greenhouse gas emissions reductions and other associated benefits, to understand areas of progress and success, and to identify how future efforts might be improved. In order to develop and collect this information, CARB engaged with and relied on input from MPOs; academic experts; builders; environmental, public health, and equity advocates; State and local government practitioners; and public stakeholders. CARB conducted a written survey of MPO staff, held one-on-one interviews with a diverse set of experts and

received testimonials exemplifying community transportation challenges, asked for public input in April and May 2018, participated in stakeholder-organized events, and held four public workshops across the state in June 2018.

Over the past 9 months in the development of this report, CARB has focused its efforts in the following two areas:

- Compiling data. CARB collected and processed a set of 24 data-supported indicators to help assess what on-the-ground change has occurred since SB 375 was enacted, including indicators related to greenhouse gas emissions reductions and strategies utilized to meet the targets. CARB chose data that was publicly available, updated frequently enough to support ongoing monitoring, and of adequate quality and spatial resolution.²⁰ CARB avoided using proprietary metrics that could not be reproduced internally. These criteria had two implications:

First, a number of important measures could not be included in this inaugural report. An omission does not indicate that CARB felt that a particular issue or metric lacked value. In fact, some key conclusions of this report are that there is a need to more systematically collect and compile data that are already available, and that new data sources need to be developed to better measure California's progress in reducing greenhouse gas emissions in ways that advance health, equity, and sustainability. Second, in some cases, CARB needed to rely on existing data from MPOs, and for this reason, region-to-region comparisons of any particular data point may not be accurate or appropriate. Staff have made an effort to note these instances where possible.

- Identifying best practices, challenges, and impacts of State policies and funding to the extent possible. CARB asked MPOs, technical experts, and other stakeholders to help identify successes and challenges to date, including regional best practices and the impact of recent State policies and funding. This report distills the feedback provided by these stakeholders to CARB through surveys, interviews, and workshop discussions. In generating and summarizing this input, CARB sought to be as inclusive as possible. In this way, this report attempts to highlight the perspectives of many people who have been involved in SB 375 implementation, in one role or another, for many years.

²⁰ Indicators reported as statewide in this report refer to the area covered by California's 18 MPOs. Because 97 percent of California's population lives in these regions, a full accounting of statewide changes would likely not differ significantly.

This report begins with a focused look at a critical question: is California meeting SB 375 climate goals; providing Californians with meaningful alternatives to vehicle travel; and coordinating land use, transportation, and housing planning and decisions? The report first provides a snapshot of progress on whether the state is on track to meet SB 375 greenhouse gas emissions targets. It then analyzes three key strategy areas for meeting the targets: transportation, housing, and land use. Each of these sections provides data-supported indicators for these strategies, explaining what is known and what requires further data. Finally, the Challenges and Opportunities section identifies and discusses challenges, regional best practices, the impacts of state policies and funding on the progress towards the SB 375 goals, as well as opportunities to help overcome identified challenges, organized by eight key areas.

For additional information and charts on the statewide and region-level data-supported metrics used in this report as shown in Table 1, see Appendices A and B. For further description and resource links to regional best practices, see Appendix C.

Table 1. Key Questions and SB 375 Progress Performance Indicators

HAVE GREENHOUSE GASES FROM PERSONAL VEHICLE TRAVEL DECLINED?
Greenhouse Gas Emissions Per Capita
Passenger Vehicle Miles Traveled (VMT) Per Capita
HOW HAVE OTHER FACTORS INFLUENCED PERSONAL VEHICLE TRAVEL?
Fuel Prices
Unemployment Rate And Available Jobs
Vehicle Ownership
HOW HAVE TRAVEL PATTERNS CHANGED?
Commute Mode Share
Commute Trip Travel Time By Mode, Including For Low-Income And Unincorporated Areas
Transit Ridership Per Capita
WHAT TRANSPORTATION CHOICES ARE AVAILABLE?
Transit Service Hours Per Capita
Lane Miles Built
ARE INVESTMENTS SHIFTING TOWARD MORE SUSTAINABLE TRANSPORTATION CHOICES?
Change In Long-Term Spending Plans By Mode
Change In Short-Term Spending Plans By Mode
Change In Transit Operations Spending
HOW HAS HOUSING SUPPLY CHANGED?
New Homes Built By Type
Vacancy Rate
Jobs-Housing Balance
WHAT ARE THE IMPACTS OF HOUSING COSTS ON CALIFORNIA HOUSEHOLDS?
Housing Cost Burden
Moving Trends And Displacement Risk Within California
HOW ARE LOCAL JURISDICTIONS PLANNING AND PERMITTING HOME CONSTRUCTION?
Percent Of Jurisdictions With A Certified Housing Element
Housing Units Permitted Compared To Housing Needs Allocation
IS GROWTH MORE COMPACT?
Acres Developed
Agricultural Land Lost
Land Conservation
ARE WE BUILDING NEIGHBORHOODS THAT ARE ACCESSIBLE TO DAILY NEEDS?
Percentage Of Population Living Near A Grocery Store

Snapshot: Is California On Track To Meet Sustainable Communities Targets?

Initial indications suggest that while California has put in place appropriate long-range greenhouse gas emissions reduction targets, as well as the regional growth and investment plans that would allow it to slow growth in vehicle travel, the real-world results are falling significantly short of the SB 375 targets and are moving in the wrong direction (see Figure 1).

California's SB 375 targets are specific to each region and tied to two milestone years: 2020 and 2035. CARB originally set the targets in 2010 and recently updated them in March 2018 to address more ambitious State climate law, including SB 32.²¹ This report assesses progress made toward the original 2010 targets, as planning and implementation actions for the recently updated targets has yet to occur.

SB 375 passenger vehicle greenhouse gas emissions reductions²² cannot be directly measured because greenhouse gas emissions come from many sources. Therefore, progress in this area was estimated using gasoline fuel sales data. This was used to estimate changes in both SB 375-targeted carbon dioxide (CO₂) emissions and VMT.^{23,24}

²¹ For more information on updated targets approved by CARB in March 2018 see: California Air Resources Board. February 2018. *Updated Final Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*. Retrieved from https://www.arb.ca.gov/cc/sb375/sb375_target_update_final_staff_report_feb2018.pdf.

²² Greenhouse gas emissions considered under the SB 375 program reflect carbon-dioxide (CO₂) emissions only from light-duty passenger vehicles.

²³ VMT was calculated because all SCS plans anticipate progress via passenger VMT reduction.

²⁴ In the SB 375 program, CARB estimates greenhouse gas emissions by converting changes in estimated VMT into CO₂ emissions using its emissions factor (EMFAC) model that reflects the vehicle fleet mix and the fuel efficiency of different vehicles, vehicle speeds, and other factors that influence greenhouse gas emissions. In measuring progress under SB 375, CARB does not include greenhouse gas emissions reductions from State policies in its calculations, such as the Pavley Clean Car Standards and the Advanced Clean Cars Program, as those are counted elsewhere in the Scoping Plan.

Have Greenhouse Gases From Personal Vehicle Travel Declined?

Actual SB 375 greenhouse gas emissions and VMT per capita have not declined as expected, even though all regions have prepared SCSs that plan to meet the SB 375 targets with strategies that reduce greenhouse gas emissions from VMT.

Across California, all MPOs have prepared and adopted SCSs with strategies to reduce greenhouse gas emissions reductions, specifically CO₂ per capita emissions reductions resulting from VMT and other greenhouse gas emissions reduction strategies (e.g., traffic improvements and clean vehicle infrastructure), which have been approved by CARB to meet the targets set in 2010. However, Figure 1 reveals that on average, from 2005 to 2016, the trend in California's CO₂ attributed to VMT per capita has not declined as expected. Over this time period, California Department of Tax and Fee Administration (CDTFA) gasoline fuel

sales data show that the statewide decline in SB 375-targeted per capita CO₂ was 2 percent as depicted by the blue line.²⁵ However, when further excluding all the benefits of fuel efficiency improvements, the data suggest that statewide passenger vehicle travel per capita (per capita VMT) has actually increased, as shown by the orange line.²⁶ In other words, the overall 2 percent decline in per capita CO₂ represents the combined effect of fuel efficiency gains and increases in VMT.

Statewide, current MPO SCSs plan for a 9.6 percent reduction in per capita passenger vehicle CO₂ emissions by 2020 and an 18 percent reduction by 2035 compared to

"Transportation emissions are increasing and we must understand what Californians need to help reverse that trend. This is critical since all signs indicate climate change is happening faster than expected."

- Mary Nichols

Chair

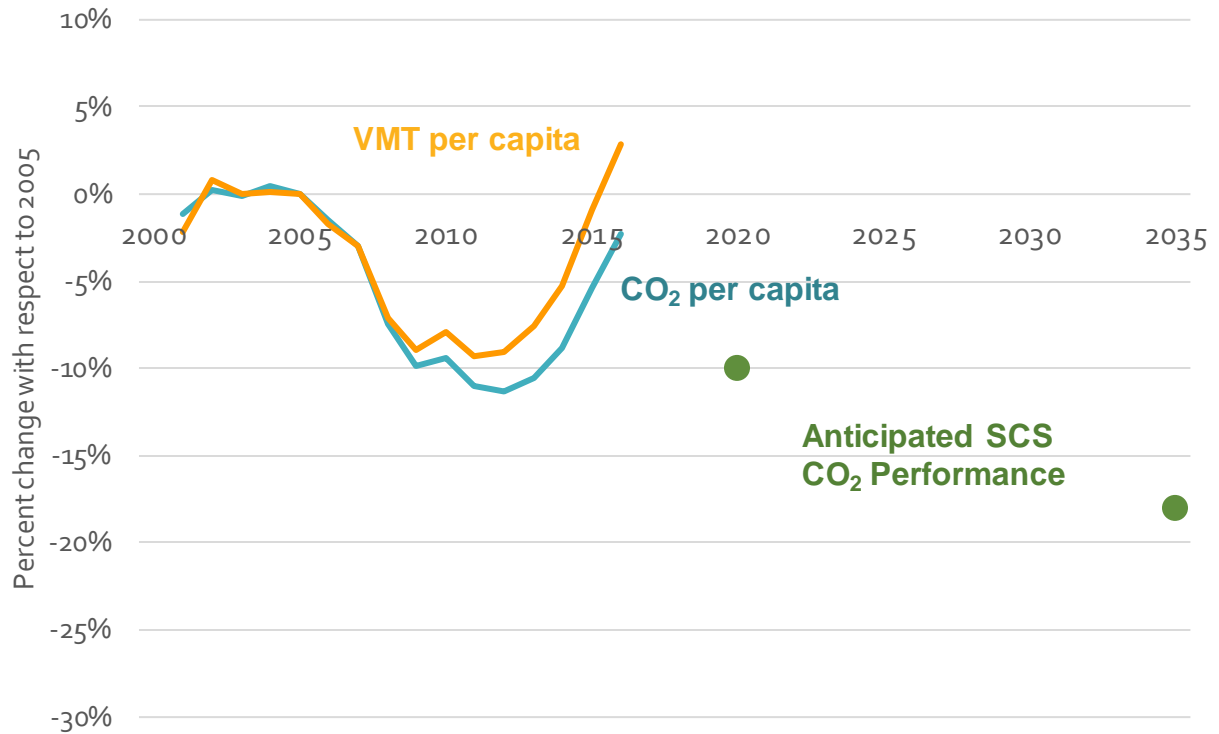
California Air Resources Board

²⁵ As estimated here, SB 375-targeted per capita CO₂ excludes the portion of CO₂ emissions reductions achieved by State policies. This CO₂ per capita indicator is not exactly the same as SB 375 CO₂ as it includes emissions attributable to non-MPO areas of the state, as well as pass-through travel in the regions, but is the closest surrogate.

²⁶ As estimated here, the trend in passenger vehicle VMT per capita includes all light-duty VMT. This VMT indicator is not exactly the same as SB 375 VMT as it includes VMT attributable to non-MPO areas of the state and pass-through light-duty VMT in the regions (external trips), but is the closest surrogate.

2005 levels, which exceed the targets CARB set in 2010, and are less aggressive than CARB’s latest target updates. This evidence shows that California is clearly not on the trajectory to meet SB 375 climate goals.

Figure 1. Statewide CO₂ and VMT Per Capita Trend with Respect to Anticipated Performance of Current SB 375 SCSs²⁷



Source: CDTFA, U.S.EIA, U.S. EPA, CARB

CARB is unable to report greenhouse gas emissions reduction progress by region due to data gaps.

SB 150 requires CARB to assess the progress made by each MPO in meeting the regional greenhouse gas emissions reduction targets. Unfortunately, CARB was unable to find a data source that would allow us to accurately report greenhouse gas emissions reductions by region. The CDTFA gasoline consumption data that was used for the statewide analysis above is not available at the county-level for use in a regional

²⁷ CO₂ and VMT calculated based on California Department of Tax and Fee Administration gasoline fuel sales data.

analysis. While alternative data sources, specifically the California Department of Transportation's (Caltrans') Highway Performance Monitoring System (HPMS) does provide an estimate of VMT by county, CARB found irregularities that need to be addressed before this information can be used for monitoring change for this report. See Appendix A for additional discussion.

The available data make it clear that progress and challenges vary greatly by region. Other indicators such as the portion of commuters who drive alone to work, growth in the highway network as compared to change in transit service, housing production, and the increase in compact growth suggest that regions are on different trajectories, some of which may increase VMT and some of which may decrease VMT.

California's greenhouse gas emissions under SB 375 and VMT per capita for passenger travel are actually heading in the wrong direction, even though every region has prepared an SCS outlining an expected growth pattern and set of investments that will allow it to meet its greenhouse gas emissions reduction targets. This suggests that the original SCS plans are not being implemented as envisioned or are not yielding the expected results. Challenges that impede plan implementation are discussed in the Challenges and Opportunities section.







What Factors Are Influencing Travel Decisions?

Many factors influence an individual's travel choices, and they interact with one another in a complex manner that is not always well understood. Figure 2 summarizes the key factors that CARB explored in this report. SB 375 acknowledges the important roles that investments in viable travel alternatives such as transit, cycling, and walking, as well as regional growth patterns play in influencing a person's decision. This report focuses on efforts and progress made in these areas, which are discussed in more depth across the remainder of this report.

While not the focus of SB 375, it is important to acknowledge that other factors determined at a macro-level, such as gas prices and employment, play a significant role in influencing personal travel behavior and affect SB 375 implementation. At the time targets were set in 2010 and many of the regions were preparing their SCSs in 2011-2014, gas prices had been trending upwards and were not anticipated to drop significantly. California was recovering from a significant recession, which had left many regions unsure what to assume about a future economic recovery. Beginning in 2014, however, gas prices began to make a steep decline, the unemployment rate approached pre-recession levels, available jobs finally exceeded 2005 levels, and auto ownership was in the middle of a steep upward rise.

In practice, these unforeseen shifts partially resulted in a number of SCSs projecting greater reductions in personal travel than the current trends. However, even at a time of falling gas prices, some regions' VMT declined, while others' rose, suggesting that other factors have an important impact as well. Given that these trends will continue to change over time, policymakers must think through what tools and practices will allow each region to meet its goals despite continued variability.

Figure 2. Factors Influencing Travel Decisions²⁸

	<p>Transportation: Around 75 percent of commuters drove alone to work, an amount that is staying the same or growing in most regions. Transit operations spending increased, but just enough to keep pace with population growth and rising costs, and ridership fell in recent years. Spending on active transportation, such as infrastructure to support safer walking and cycling, also grew. But in California’s four largest regions,²⁹ the proportion of overall transportation spending by mode remained nearly the same. From 2010 to 2016, Californians spent more time on their commute, whether they drove or took public transit.</p>
	<p>Housing: New home construction began to recover from the recession, led by multi-family home construction, mostly in the more urbanized regions. While a strong majority of localities have created certified Housing Elements, housing construction and permitting were significantly behind housing allocations and SCS plans, especially in lower income categories. Jobs/housing imbalances have recently increased in many regions. Housing cost burdens also increased in every region. Low-income residents moved more and are less likely to move into different geographic areas of the State than higher-income residents.</p>
	<p>Land Development: The number of acres being developed fell greatly during the recession but then began to rebound. While growth became more efficient (measured in persons / developed acre), the pattern differed substantially in rural and urban regions and recently began to become less efficient in some places. The loss of agricultural land from 2000-2014 was highest in Southern California and the San Joaquin Valley.</p>
	<p>Access to Goods and Services: The vast majority and an increasing portion of Californians had access to a grocery store within one mile of their home if they lived in an urban area or ten miles in a rural area. Neighborhoods with convenient or even walkable goods and services can make it easy to drive less.</p>
	<p>Equity: Low-income communities tended to have shorter auto and transit commutes, commutes for unincorporated communities tended to be longer, compared to regional averages. However, renters of color and Hispanic renters were more likely to be overburdened by housing costs than white renters. This report identifies a number of steps that California can take to better track whether health, mobility, and access to opportunities are improving, and whether burdens are easing, as efforts are made to reduce greenhouse gases.</p>
	<p>Economy: Around 2011-2013, employment and vehicle ownership rose, while gas prices fell.</p>

²⁸ The information provided in this table are findings from this report. Further detail is provided in the report that follows. A full description of sources and methods is available in Appendix A.

²⁹ The report often focuses on the four largest regions: Southern California, the San Francisco Bay Area, San Diego County, and the Sacramento region.

Additional Action Is Needed

These findings indicate the need for additional action. The State is not on track to meet the greenhouse gas reductions expected under SB 375 for 2020. Furthermore, despite meeting California's overall 2020 climate target ahead of schedule, greenhouse gas emissions from the transportation sector continue to rise across the State.

Meeting future targets will thus require a stronger contribution from this sector, and specifically the transportation system. Without a significant change to the current trajectory, California will not achieve the necessary greenhouse gas reduction mandates for 2030. Specifically, CARB's *2030 Scoping Plan Update*³⁰ identifies additional VMT reduction beyond that included in the SB 375 targets as necessary to achieve a statewide target of 40 percent below 1990 level emissions by 2030. Even greater reductions will be needed to achieve the new carbon neutrality goal by 2045.³¹

"Planning decisions are ultimately health decisions. Unfortunately, the plans and investments to achieve healthier communities envisioned by SB 375 are falling short. Local, regional, and state leaders need to urgently rethink those decisions, listen to their communities and get on the right track."

- Will Barrett

*Clean Air Advocacy Director
American Lung Association in California*

By failing to meet its greenhouse gas emissions reduction targets through these strategies, California will put at risk all the other important benefits linked to reducing VMT. These benefits include improvements in public health, especially in communities that are already the most burdened by pollution, as well as conservation of natural and working landscapes, expanded access to homes at a range of income levels, reduced traffic congestion and road maintenance burden, and improved transportation choices for people of all incomes.

³⁰ California Air Resources Board. November 2017. *California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target*. Retrieved from https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

³¹ Executive Order B-55-18. September 2018. Retrieved from <https://www.gov.ca.gov/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>.

CAN WE NOT JUST REDUCE GREENHOUSE GASES BY SWITCHING TO CLEANER VEHICLES AND FUELS?

CARB's 2017 *Climate Change Scoping Plan Update* conducted a comprehensive assessment of greenhouse gas emissions reductions strategies. The plan concludes that California cannot meet its climate goals without curbing growth in single-occupancy vehicle activity.

Even if the share of new car sales that are ZEVs grows nearly 10-fold from today, California would still need to reduce VMT per capita 25 percent to achieve the necessary reductions for 2030.

Furthermore, strategies to curb VMT growth help address other problems that focusing exclusively on future vehicle and fuels technologies do not. For example, spending less time behind the steering wheel and more time walking or cycling home, with the family, or out with friends can improve public health by reducing chronic disease burdens and preventing early death through transport-related physical activity. Improving access to affordable homes in high opportunity areas that are walkable, bikable, and have public transit will ensure that more Californians are able to benefit from these improved health outcomes. Finally, reducing vehicle travel will be crucial to keep congestion from both bringing traffic to a standstill and continuing to put pressure on the state's roadway infrastructure as population grows.

Efforts to reduce vehicle travel are a key component of California's efforts to preserve our climate and build healthier, more sustainable, equitable and more prosperous regions for future generations.

Strategies for Meeting the Targets

In order to see greater results in the future policymakers need to better understand what has happened over the last decade. Indicators allow us to assess whether or not California's regions have begun the transition to building healthy, sustainable communities. This section of the report identifies and summarizes CARB's analysis of data-supported indicators for measuring progress across key strategies identified in SCSs to meet SB 375 targets in the areas of travel, housing, and land use.³²

³² SB 375 notes that achieving state climate goals requires achieving "significant greenhouse gas reductions from changed land use patterns and improved transportation" and strengthened the link between the allocation of regional housing needs and regional transportation planning.

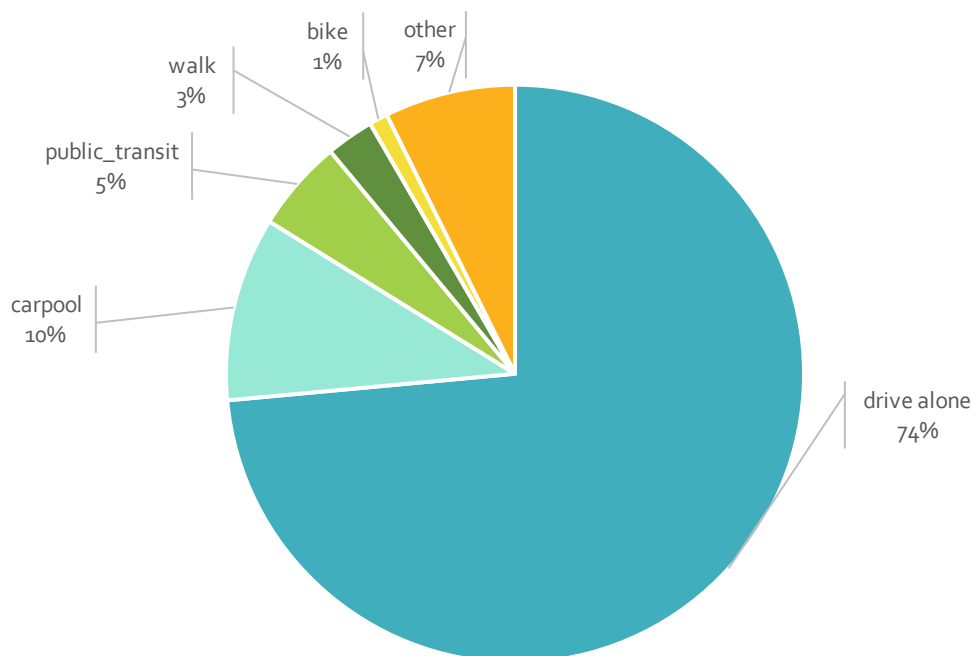
Transportation: Transforming the Way We Travel By Providing Viable Travel Alternatives

The following discussion is focused on data points that help answer whether efforts to date have changed how Californians are traveling. CARB examines whether dependence on automobiles is declining and whether transit, carpooling, and active transportation have become more convenient and frequent choices. Data is also used to look at the extent to which long-range and short-range spending plans are shifting in ways to provide those other travel choices. CARB also identifies where additional data gathering and analysis work in this area would be useful.

HOW HAVE TRAVEL PATTERNS CHANGED?

In general, Californians are continuing to drive more, and carpool less to work. Transit ridership has begun to fall across California and there continues to be a relatively small percentage of people that walk and bike to work, approximately 4.5 percent.

Figure 3. Travel mode to work (2016)*



* Travel to work represents approximately one-quarter of all trips, though it is generally also an employed person's longest trip. Other trip purposes include school, recreation, and shopping.

- **Drive Alone:** In both 2005 and 2016, around 75 percent of commuters drove alone to work, and the trend has either remained flat or risen in most regions. The most notable exception is the Bay Area region (MTC/ABAG), where not only do a smaller share of residents drive to work alone than in any other region, but from 2005 to 2016 that percentage fell steadily from 69 to 65 percent. The Monterey and Santa Barbara regions (AMBAG and SBCAG) also have drive-alone rates that are among the lowest in California.
- **Carpool:** Despite the growing use of ride-sharing and pooling services that can facilitate spontaneous carpools, high-occupancy lanes, and other efforts to promote commute carpooling, carpool rates are falling in California.
- **Walk and Bike:** In the four largest regions, the active transportation mode share is highest in the Bay Area, where it rose from 4.2 percent in 2005 to 5.5 percent in 2016. It also increased from 2.4 percent to 3.9 percent in SANDAG, while remaining more constant in the other large regions. Some rural regions such as Santa Barbara, Butte, and San Luis Obispo, have comparatively high rates, above 6 percent, with upward trajectories. Rates in the San Joaquin Valley are lower and more mixed.
- **Transit:** While transit operations funding increased statewide since 2005, starting around 2014, transit ridership has shown a continuing declining trend across California, including in urban regions like the Southern California Association of Governments (SCAG) and rural regions like Butte. At the same time, some regions such as Kings saw increases in transit service that resulted in significant increases in ridership. For travel to work, the percentage of people commuting via public transit remained flat and at or below 5 percent in the large urban regions, except for the Bay Area, which rose from 9.4 to 11.9 percent. Other regions were generally below 2 percent for most years, except for the San Luis Obispo and Monterey regions, which were a bit higher.

Transit ridership data gathered through year 2017 falls far short of the 2020 performance expectations in the SCSs.

Eight of 18 MPOs reported information on transit ridership assumptions included in their adopted SCSs for 2020 and 2035. When comparing the reported information for the nearest year (2020) to observed transit ridership information gathered through year 2017, CARB found that in all cases each plan's projections were higher than the recent trends indicate in those regions. (See Appendix B.)

Furthermore, most Californians are spending more time on their commutes and in traffic.

- Overall Commute Times: From 2010 to 2016, overall commute-trip travel time increased in most regions, both for automobile commuters in 13 out of 17 regions and for public transit commuters in 12 out of 15 regions.³³ Travel time was generally longest in the most urban regions, and travel times for transit commuters generally increased by more than for auto commuters.
- Low-Income and Rural Area Commute Times: This report also compared travel times in low-income and rural communities, and how they changed from 2010 to 2016, to regional averages. In 2016, low-income census tracts³⁴ had shorter automobile and public transit commute times than the regional averages in nearly two-thirds of regions, including the four largest. Unincorporated rural areas, which tend to be further from job centers and less well-served by public transit, did have longer commute times than regional averages: the driving time was higher in every observed region, and the public-transit commute time was higher in over three-quarters of regions. Between 2010 and 2016, average travel times changed substantially in some places and very little in others, with greater changes observed for public transit than for driving. For more information on commute times and how they changed, see Appendix A.

³³ Not all regions' commute-trip travel times were reported.

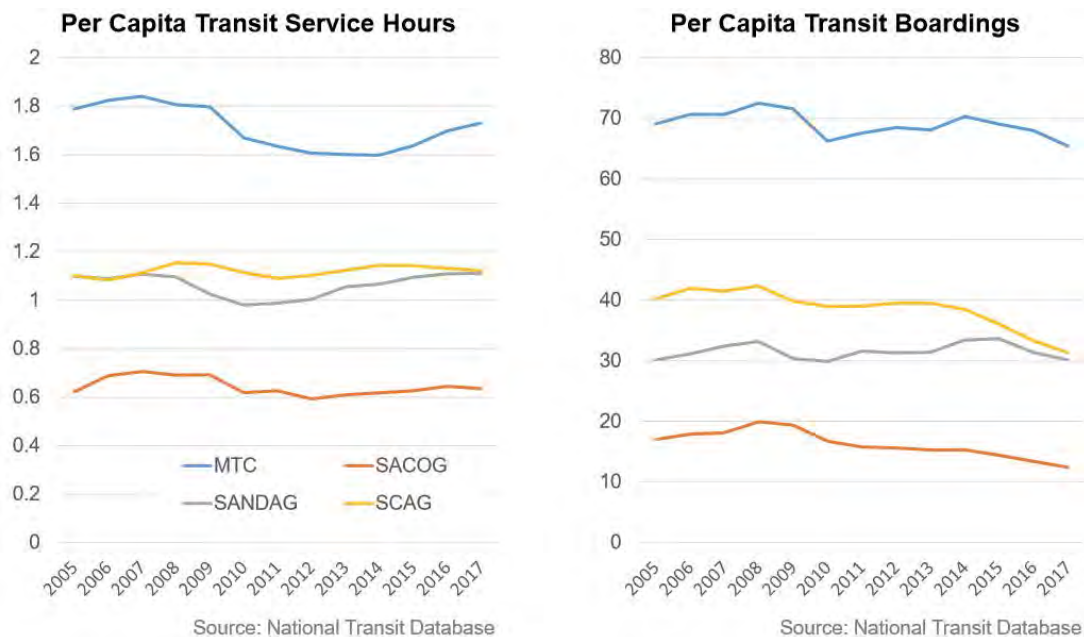
³⁴ Census tracts with median household incomes below 80 percent and below 50 percent of the county median income.

WHAT TRANSPORTATION CHOICES ARE AVAILABLE?

Transportation choices have not yet advanced enough to help slow VMT growth. Roadways that primarily facilitate driving have continued to expand, and transit service per capita has barely rebounded to pre-recession levels.

- **Roadways:** From 2005 to 2014, total statewide interstate and principle arterial lane miles built increased by 7.9 percent, or 0.4 percent per capita. Region-specific data on road expansion was available only for 2012-2014. During this time period, the road expansion rate was highest in several San Joaquin Valley Counties, especially Fresno and Merced, as well as Butte and Sacramento regions. While this roadway capacity expansion is intended to address congestion and public safety, it is well understood that new roadway capacity results in additional driving, increased air pollution, and has environmental, equity, health, and other societal impacts, and may not always result in overall reductions in congestion.
- **Transit Service:** In many places, transit service hours per capita started declining in 2007-2008 during the recession. Service hours per capita started to rebound slowly in the most urban regions in 2012, but as of 2017, this has not gone above pre-recession levels.

Figure 4. Transit Service and Transit Boardings (2005-2017)



BEYOND THE NUMBERS: PUBLIC TRANSIT COMMUTING IN LOW-INCOME COMMUNITIES



One Resident from the Barrio Logan neighborhood of San Diego shares this story: “[I] utilize various modes of transportation to be part of the solution to reduce emissions, for exercise, and for fun. My commute to work would be a 30-minute drive on the freeway, but by using transit and my bike, that journey turns into a 3 hour long commute each way. To get to work, I wake up at 4 am to get ready. I leave the house at 5:30 am and bike for an hour and a half to the bus stop in order to catch the bus at 7:05 am. An hour and a half later, I finally arrive at work. At the end of my work day at approximately 5:30 pm, I begin my journey home and arrive three hours later at 8:30 pm. I [have to] make my own path to work using connecting streets, roads, trails & the public bus system. There are no signs on this daily commute that keeps me safe as a biker. I must use my protective gear, biking experience, good judgement and ultimately pray that drivers see me and make the right choice to share the road.”

In public input for this project, CARB heard many similar stories, about long journeys to work and about certain trips that cannot be taken due to the limits of the transportation network. When reliable transportation is not available, a person may not be able to take a given job, class, shopping trip, or medical appointment. The numbers cannot measure trips not taken. They cannot adequately convey how transportation options impact daily lives, health and safety, and economic futures, nor what a region or the state as a whole loses when these connections are not made.³⁵

³⁵ For one resource showing statistical correlation between efforts to advance economic and racial equity, including by MPOs, and regional economic growth see: Benner, C. & Pastor, M. 2012. *Just Growth: Inclusion and Prosperity in America's Metropolitan Regions*. Routledge: New York.

This report found that a major increase in car ownership occurred in the last eight years. There is not data available on which groups purchased cars and why. It is possible that this increase may reflect a low-income community member being able to more quickly get to a job or school. It is also possible that the owners would have preferred to avoid the expense of car ownership if travel via walking, cycling, carpooling, and public transit were more convenient. Expanding low-cost transportation choices for those who need it most, especially low-income community members, can help promote achievement of California's climate goals and also improve the economic futures, health outcomes, and quality of life of local residents and the region as a whole. Under SB 350,³⁶ CARB has been working with community members to identify barriers to access clean transportation and mobility options in low-income communities, and to take action to address them.³⁷

ARE INVESTMENTS SHIFTING TOWARD MORE SUSTAINABLE TRANSPORTATION CHOICES?

Important strides to increase funding for transportation choices have been made, including the largest regions of California increasing public transit, road maintenance, and active transportation spending, but current data suggest more must be done to shift transportation investments to accelerate progress on climate, accessibility, health, and equity benefits.

- Overall Investments by Mode: Looking at the two most recent long-term spending plans in the largest four MPOs' RTP/SCSs, and the three most recent Transportation Improvement Programs (TIP), there is remarkably little shift in the overall spending allocations across roadway, transit, and bike and pedestrian infrastructure modes. However, within the smaller shifts, CARB notes some important observed trends that are described below.
- Transit Spending: From 2005 to 2016, statewide public transit operations spending increased by 60 percent from 2005 to 2016, and statewide transit capital spending increased by a factor of 2.5. However, in the largest regions, this increase in spending has been just a bit more than enough to allow providers to keep pace with rising costs and growing population. Per capita, overall transit service hours are 1.4 percent higher than in 2005, but lower in many regions than

³⁶ SB 350 (de León, Chapter 547, Statutes of 2015).

³⁷ For more information see: California Air Resources Board. February 2018. *Low-Income Barriers Study: Overcoming Barriers to Clean Transportation Access for Low-income Residents*. Retrieved from https://www.arb.ca.gov/msprog/transoptions/sb350_final_guidance_document_022118.pdf.

they were at their pre-recession peak. See Appendix A for greater detail. In the decades to come, 4 out of 18 regions – MTC, SCAG, SANDAG, and Tahoe – have budgeted to spend more on transit than on roadways.

- Active Transportation Spending: In a number of regions, active transportation funding in their most recent short- and long-term spending plans was higher than previous years. However, the exact degree of change was difficult to ascertain, as regions are also simultaneously improving their ability to document active transportation expenditures, which were previously often included in road projects. In Southern California, the amount programmed for walking and cycling infrastructure grew from \$520 million for the 6 years beginning in 2015 to \$1.04 billion for the 6 years beginning in 2017. Impressive as this increase is, the amount to be spent on active transportation is still below 3 percent of total funds to be spent in SCAG’s Regional Transportation Plan.
- Roadway Spending: In the planning areas covered by MTC/ABAG, Sacramento Area Council of Governments (SACOG), and SCAG, road maintenance funding in the most recent RTP increased, and funds for road and highway expansion decreased, even as total budgets increased. In SANDAG, nearly three times as much is planned to be spent on building high-occupancy vehicle and/or toll lanes than on general purpose highway capacity in the long-term RTP, and over three times as much in the short-term TIPs. (Note: CARB received limited data on this trend from other regions.)

Looking beyond spending plans for the largest four MPOs, CARB observed some spending shifts in California’s smaller regions.

There are not large shifts in most regions in terms of what portion of transportation budgets are devoted to roads versus transit, walking, and cycling. However, transformative projects are being built. Expanding LA Metro’s rail lines, ACE Rail to Merced, BART to San Jose, and many other significant public transit investments are expected to provide new beneficial transportation options.

These findings suggest that changing spending budgets is not an easy task. The “Challenges and Opportunity Areas” section of this report includes a more detailed discussion on “State Funding for Transportation and Development Projects.” It outlines challenges such as the interplay between local, regional, and State authority; impacts of recent State actions, and some possible next steps. Important caveats to better understand the data are also included in Appendix A.

WHAT DO WE NOT KNOW YET, AND WHERE IS ADDITIONAL WORK NEEDED?

Transportation spending is administered and tracked by many different agencies, but these spending streams are not compiled to help understand whether current investments align with long-term goals. In order to verify investments in long-range RTPs are being implemented through short-term spending, there is a need for better compilation of the different short-term spending streams.

Many transportation data points are not collected at the community-scale, which makes it difficult to assess whether transportation investments provide equitable benefits and avoid harm for low-income and disadvantaged communities. Some examples of data needs include where new arterials and highway lane miles are being built in proximity to low-income communities or high-minority populations, as well as whether transit service hours, measures of transit crowding, and vehicle quality are increasing or decreasing in communities that have been historically underserved.

Air quality data is not collected at the community-scale, which makes it difficult to assess the impacts of shifting travel patterns on California's most pollution-burdened communities. As a first step to helping further inform this discussion, CARB is now in the process of identifying disproportionately-burdened communities, building community-scale emissions inventories, and developing criteria and guidance for community air monitoring pursuant to AB 617 (C. Garcia, Chapter 136, Statutes of 2017).

Cyclist and pedestrian infrastructure data are not compiled in a standard format across multiple jurisdictions to track whether and how these options are expanding. More systematic and region-specific data on cyclist and pedestrian infrastructure and safety, such as the lane-miles or lane-miles per capita of cyclist and/or pedestrian facilities, the percent of residents or jobs located near high-quality bicycle lanes, the level of traffic stress or maintenance conditions on cycling facilities, and cyclist and pedestrian fatalities and injuries is needed. As a first step, Caltrans is now in the process of obtaining some of these data sets.

Transportation Network Company (TNC) trip-level data is not available to State, regional, and local public agencies, nor to academic researchers in California to understand how they are affecting VMT and transit travel. There is a need to obtain proprietary data from ride-hailing service providers.

Transportation data is not collected at the resolution necessary to understand whether, how, and why people are shifting their travel patterns for their most prevalent trip types like errands, education, and recreation. There is a need for data on non-work trips, such as from data available through big data sources or by updating travel-demand surveys.

Housing: Providing Housing Choices for All Income Levels in Neighborhoods with Access to Sustainable Transportation Choices and Economic Opportunities

California currently faces a crisis of housing affordability. The California Department of Housing and Community Development (HCD) estimates that builders around the state need to construct 180,000 homes every year. Instead, for the past ten years, the state has built an annual average below 80,000, which is less than half of the need. As prices have soared in job centers, high housing costs may lengthen commutes if people have to drive further to find a home they can afford. The following discussion is focused on data points for housing construction, local planning for housing, affordability, and displacement. Data is used to look at the extent to which housing growth assumptions in the SCSs compared to what is happening on-the-ground are similar or not, and how this affects travel patterns. CARB also identifies where additional data gathering and analysis work in this area would be useful.

HOW HAS HOUSING SUPPLY CHANGED?

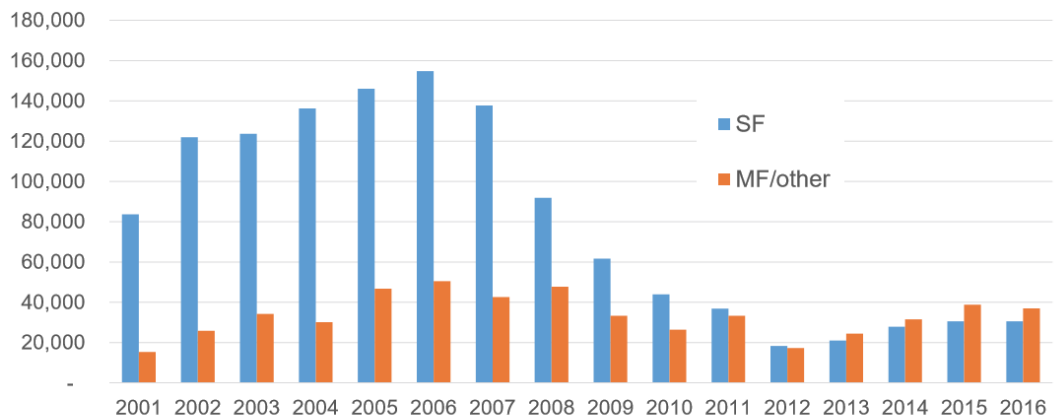
Coordination of housing and transportation planning is key to SB 375 success. Housing production is falling far short of demand and what was planned in the SCSs.

New home construction and vacancy rates have declined and remained at low levels in most regions. During the same period, the balance of jobs and housing supply within most regions has continued to diverge. The housing growth that has occurred has happened in the most urban regions as multi-family housing construction, but is far below the levels assumed in the SCSs for 2020 and 2035.

- **New Home Construction:** As shown in Figure 5, starting in 2007, overall home construction began to decline and has remained at low levels between 2010-2016. This pattern occurred in every region. Some of the more urbanized regions have seen a rebound in housing construction, led by multi-family home construction, which surpassed single-family home construction beginning in 2013.

Figure 5. New Homes in California by Type

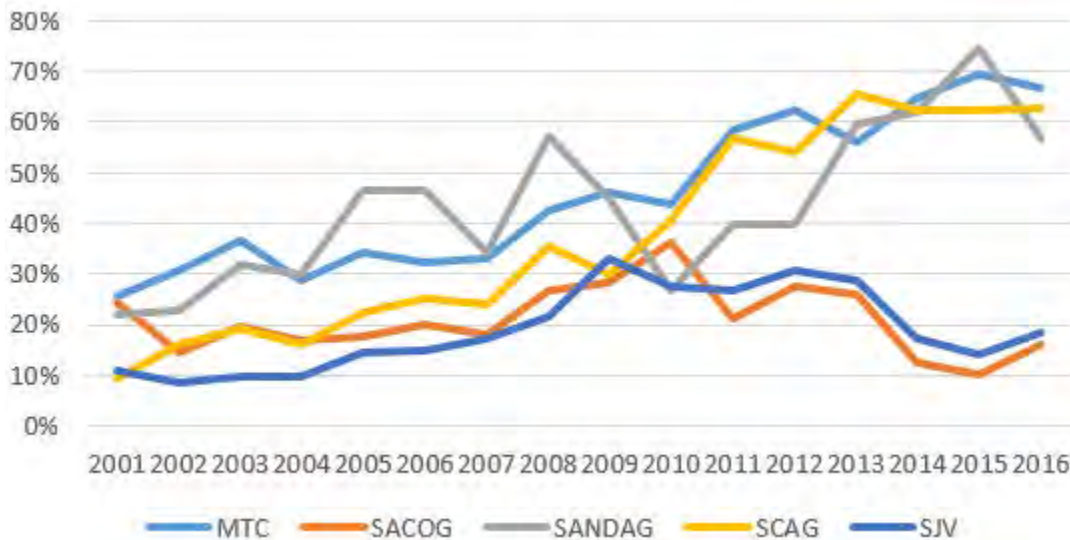
(Single Family vs. Multi-Family, 2001–2016)



Source: CA Department of Finance

However, multi-family home construction varies greatly by region. In the San Diego, Bay Area, and Southern California regions, 50 to 75 percent of new homes have been multi-family in recent years, while in the Sacramento and San Joaquin Valley regions, it has been under 20 percent.

Figure 6. Percent of New Homes That are Multi-Family in the Largest Regions (2001-2016)



Source: CA Department of Finance

Thirteen of 18 MPOs reported information on total new home construction included in their adopted SCSs for 2020 and 2035. When comparing the reported information for the nearest year (2020) to observed housing information gathered through year 2016, CARB found that in all cases what is happening today falls far short of what is assumed in the plans. The plans forecasted housing growth from 2 to over 500 percent greater than the recently observed trends in those regions. These MPOs also reported information on the type of new housing construction in their adopted SCSs (e.g., single-family and multi-family housing). CARB found that the gap between plans' forecasts and the observed data was generally greatest for multi-family construction.

- **Vacancy Rate:** At their peak in 2010-2011, housing vacancies have since continued to fall in most regions, with the most dramatic declines in the Bay Area and adjacent counties of Merced and San Joaquin, as well as in San Diego County. Other San Joaquin Valley and rural counties have seen more gradual or even rising trends. Vacancy rates vary greatly across regions, from 5 to 13 percent.

- Jobs-Housing Balance: CARB looked at the degree to which jobs-housing supplies within counties diverged from the overall regional jobs-housing supply. By this metric, MTC/ABAG, SACOG, and AMBAG grew more divergent, while SCAG's balance improved over earlier years, though its imbalance is now increasing. The San Joaquin Valley counties have very similar jobs-housing balances.

"Transportation in the Bay Area is all about managing the flow of people going from the east, where many people can afford to live, to the west, where many of the jobs are. Until that problem gets fixed, we can make the best transportation decisions in the world, and it won't solve this enormous problem."

- Ken Kirkey

*Director of Planning
Metropolitan Transportation Commission*

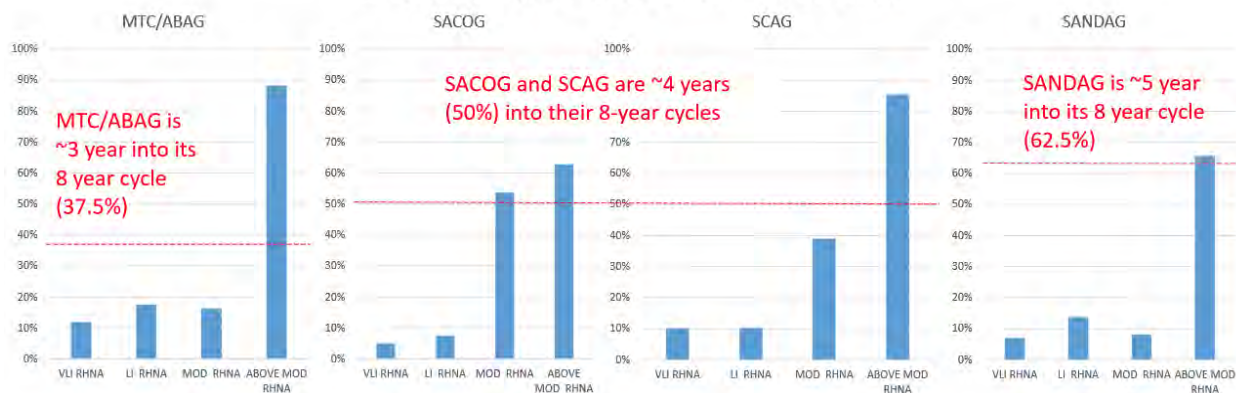
WHAT ARE THE IMPACTS OF HOUSING COSTS ON CALIFORNIA HOUSEHOLDS?

Local Housing Element planning is nearly fully compliant, but actual permits issued are lagging, especially for affordable housing.

Across California, 89 percent of local jurisdictions have certified Housing Elements with HCD. While creating a Housing Element is an important first step to show how future needs can be accommodated, it does not guarantee that housing will get built. Localities are required to submit Annual Progress Reports showing how many permits for homes they have issued in each income category to developers. However, this data is spotty, as jurisdictions with only 79.6 percent of the housing need have completed all of their Annual Progress Reports for this cycle. In the four largest regions, according to the reports that were submitted, most regions are ahead of schedule in issuing permits for housing for the wealthiest “above-moderate” housing product but are falling short in the three more affordable categories: moderate, low-income, and very low-income. In the San Joaquin Valley, local governments have issued more permits in the moderate income category. The remaining 6 rural regions, especially SLOCOG, are closest to being on track for issuing permits for housing needs at all income levels.

Figure 7. Housing Need Permitted, By Income Level

Percentage of total Regional Housing Needs Allocation (RHNA) for which building permits have been issued, reported by household income: Very Low Income (VLI), Low-Income (LI), Moderate (Mod), and Above Moderate (Above Mod).



Source: CA HCD, 5th Cycle Annual Progress Report Permit Summary. Data shown includes only jurisdictions with complete reporting in 2017.

As housing is becoming less affordable, California’s low-income residents are relocating at greater rates than the rest of the population.

Housing cost burden is rising in every region, for all income-levels. At the same time, moving trends indicate that low-income persons are relocating at greater rates to inland areas outside of the larger coastal cities of Southern California and the Bay Area compared to other Californians.

- **Housing Cost Burden:** From 2010 to 2016 the percent of rental households that are burdened – defined as paying over 35 percent of their income in rent – rose in almost every income group, as shown in Figure 8. The largest percentage point increase occurred for households in the \$35k-74k categories, which rose by over 10 percentage points, however four out of every five households making less than \$20k were and remain overburdened. The data also shows differences by race and ethnicity, with African American renters the most likely to be over-burdened and with white renters the least likely to be overburdened.

Figure 8. Statewide Housing Burden by Income

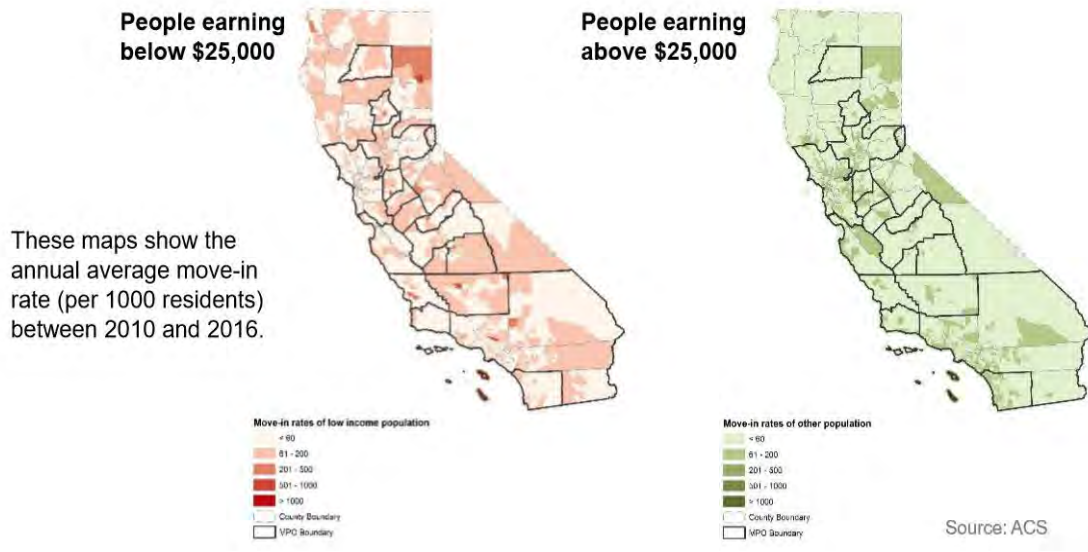


Source: ACS

- Relocation Trends and Displacement Risk: People earning less than \$25,000 per year are moving at a rate of about 18 percent higher than those earning more (71 and 60 people per 1000, respectively). Figure 9 shows where people are moving. Low-income residents are moving at greater rates to inland parts of Southern California and to the San Joaquin Valley, especially near the boundary of the Bay Area. Few are moving into the coastal areas of Southern California and the Bay Area, the latter of which has the highest displacement risk in the state.³⁸ If individuals are commuting into these job centers and unable to live closer due to housing costs, that could increase VMT and greenhouse gas emissions, as well as exacerbate the health and mental health impacts associated with displacement and long commutes.

³⁸ Displacement risk was measured as the percentage of its counties' low-income households living in census tracts that experienced a net loss in low-income population.

Figure 9. Annual Average Move-In Rate per 1000 Residents (2010-2016)



HOUSEHOLDS MOVING AWAY FROM HIGH-QUALITY TRANSIT AREAS ARE MORE LIKELY TO PURCHASE ANOTHER AUTOMOBILE, AND DRIVE MORE

A recent study on falling transit ridership in Los Angeles found possible links between increased auto ownership and displacement of low-income populations from transit areas. CARB undertook a single-year pilot study (2013-2014) to learn more about the travel and auto ownership patterns of households moving to and away from high-quality transit areas (HQTAs) and found that:

- Statewide, for every 100 car-owning households that moved out of a high-quality transit area, only 95 moved in, possibly replaced by car-free households. Households moving away from transit added cars more than did households who moved to HQTAs.
- Vehicles in households that had moved out of transit areas accrued 75 million more annual miles in subsequent years than those that moved to transit areas. This was both because there were 5,080 more vehicles owned by households moving from transit with their mileage tracked, and because these vehicles traveled an average of 182 more miles per year.
- This increase in VMT for households moving from transit areas was greater for older cars: cars less than 5 years old travelled 47 more miles per year on average, those 10 to 15 years old travelled 198 more miles, and those 20 to 25 years old travelled 519 more miles than those moving to HQTAs. Although individual household income data was not available, the longer distances driven by households that drive older and less efficient cars suggests a possible link between income, distances to work and other destinations, and greenhouse gas emissions.

While these findings are preliminary and reflect just one year, they add to a body of research that has found that displacement may be occurring near transit, that lower-income households are commuting longer distances possibly due to a shortfall in affordable housing construction, and that falling public transit ridership may partially stem from displacement.

BEYOND THE NUMBERS: THE COST OF DISPLACEMENT



Valoria was born and raised in San Francisco, but when she couldn't afford to raise a family there, she moved across the bay to San Leandro. When her landlord converted her apartment into a condo, the nurse's assistant moved to Vacaville. Valoria still visits her hometown five days per week, when she drives her 21-year-old Honda Accord nearly two hours to her job at Laguna Honda Hospital. "The nurses that I work with — none live in San Francisco," she said. She has 21 years vested in her pension, making it difficult to leave her job. After raising four children largely on her own, she now lives with her parents, who also fled San Francisco's high prices. Both her parents worked in the city for 35 years, her father as a longshoreman, her mother a nurse. With Valoria's earning power plateauing as she reaches retirement age, she may never be able to live in San Francisco again.³⁹

Displacement is a complex topic, and one that is difficult to measure. For example, it is challenging to identify who moved due to a loss of housing versus who moved by choice. What is even more difficult to measure are what stakeholders asked CARB to highlight when consulted during the development of this SB 150 report – the impacts on the communities and people. Those who move are no longer near their former neighbors and friends, and may have to maintain that connection via long drives on the highway. Neighborhoods can become informal networks of mutual assistance when neighbors lend tools to one another, let one another pick fruit from their fruit tree, take care of the children while someone runs a quick errand, and so forth. They also form a cultural milieu – the social environment of life – and offer a sense of belonging. Social connectedness and cohesion is a major determinant of health,⁴⁰ mental health,⁴¹ and personal resilience.⁴² The loss of these connections hurts both the neighbors who leave and the neighbors who are left behind in a neighborhood they no longer recognize as home. Protecting renters and maintaining an ample supply of affordable housing for people who would like to stay in their current neighborhood not only avoids VMT as people commute back for work and social events, but also preserves neighborhood connections that can be invaluable.

WHAT DO WE NOT KNOW YET, AND WHERE IS ADDITIONAL WORK NEEDED?

Data on how the balance of affordable housing to job wage levels is changing is not collected or reported on a regular basis. There is limited regional-level data and tracking on the balance of low-wage jobs and low-cost housing. CARB and Caltrans are jointly working to further develop this information statewide through our SB 375 indicators research project.⁴³

No research-supported method exists for tracking the extent to which housing unaffordability is increasing VMT. A method is needed to track the extent to which housing costs and lack of housing supply are increasing VMT across income brackets.

Displacement, its effects, and efforts to address it are not monitored by any public entity in California. From an SB 375 perspective, the relationship of displacement to driving is important, especially as it relates to households moving away from more transit-rich areas. There is a need to track actual displacement and its impacts on access to opportunity through data such as move-out rates or evictions, and community accessibility measures. Similarly, further tracking of local anti-displacement strategies, especially in California's largest urban regions is needed to better evaluate the relative effectiveness of diverse policies.

³⁹ Source: <https://www.sfchronicle.com/business/article/Commutes-to-San-Francisco-getting-longer-for-all-6685115.php>

⁴⁰ Umberson D, Montez JK. Social relationships and health: a flashpoint for health policy. *J Health Soc Behav.* 2010;51 Suppl(Suppl):S54-66.

⁴¹ Almedom AM. Social capital and mental health: An interdisciplinary review of primary evidence. *Social Science & Medicine.* 2005;61(5):943-964.

⁴² Klinenberg, Eric. *Heat wave: A social autopsy of disaster in Chicago.* 2015 (2nd Edition). Chicago: University of Chicago Press.

⁴³ For more information, see: https://www.arb.ca.gov/research/single-project.php?row_id=65256.

Efficient Land Use: Building Compact Neighborhoods That Are Accessible To and Near Daily Needs

Building compact neighborhoods where people of all incomes live within safe walking or cycling distance of daily errands could have significant climate benefits. By increasing physical activity, it could also greatly improve public health by significantly reducing the health burdens of chronic conditions like heart disease, diabetes, obesity, certain cancers, and depression, and preventing premature deaths.^{44,45}

The following discussion is focused on data points that explore where and how new development is happening, and whether that has changed since the passage of SB 375. Data is used to look at the regional pattern of growth and conservation, as well as at the evidence available regarding whether growth is happening in healthy, walkable neighborhoods near jobs, public transportation, and daily needs. CARB also identifies where additional data gathering and analysis work in this area would be useful.

⁴⁴ California Department of Public Health. 2013. *The Burden of Chronic Disease and Injury*. Retrieved from: https://www.cdph.ca.gov/Programs/CCDC/DCDCB/CDPH%20Document%20Library/BurdenReport04-04-13_ADA.pdf.

⁴⁵ California Department of Public Health. August 2017. *Increasing Walking, Cycling, and Transit: Improving Californians' Health, Saving Costs, and Reducing Greenhouse Gases*. 2017. Retrieved from: <https://www.cdph.ca.gov/Programs/OHE/CDPH%20Document%20Library/Maizlish-2016-Increasing-Walking-Cycling-Transit-Technical-Report-rev8-17-ADA.pdf>.

IS GROWTH MORE COMPACT?

Overall, California’s recent growth trend has been more compact, however urban expansion may again be on the rise.

The pace of urbanization declined significantly during the recession and overall the amount of land used to accommodate new population in California has decreased. Agricultural land loss followed a similar trajectory as that of overall urbanization, while lands preserved for conservation increased in most regions. However, data for the latest period of time for each of these indicators suggest that these trends may not be lasting.

- **Acres Developed:** From 2000 to 2014, approximately 740 square miles of land were developed in California, which is an area approximately twice the size of the city of San Diego. As shown in Figure 10, the majority of that development (75 percent) occurred by 2008, just over halfway through the time period, and then during the recession there was a significant decline. Data for the latest period from 2012-2014 suggests that urban expansion may again be on the rise.

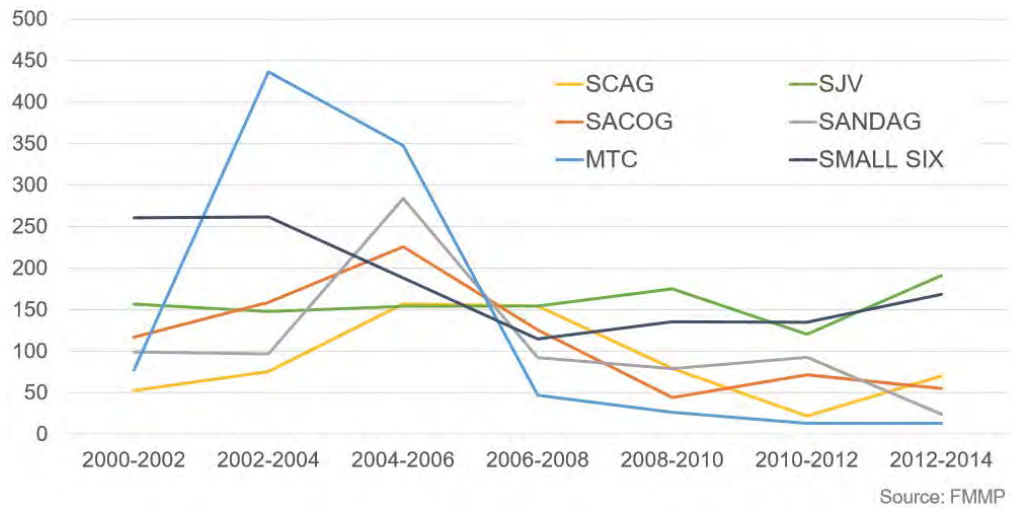
Figure 10. Newly Developed Land Acres Statewide



Source: FMMP

Of the development that occurred post-2008 in California, the rate of land developed per increase in population decreased and overall was more efficient. These changes in development efficiency could mean that more growth was happening as infill on already-urbanized land or at higher densities, but it could also reflect the housing shortage and declining vacancy rates discussed earlier in the report. As shown in Figure 11, variations in land use efficiency can be observed by region with rural regions generally less efficient in the use of land than the more urbanized regions.

Figure 11. Newly Developed Land Acres (per 1000 new residents)



- Agricultural Land Loss:** Taking a more specific look at type of land loss over the same period, total farmland and rangeland followed a similar trajectory over time as that of overall developed acres. There were increasing losses prior to the recession and decreasing losses thereafter. Data for the most recent period 2012-2014 suggests that losses of these lands may again be on the rise with total farmland loss outpacing total developed acres, largely through its conversion to other non-urban land, which can include uses such as low density rural developments. As shown in Figure 12, total losses were greatest in Southern California and nearly as high in the San Joaquin Valley.

Figure 12. Total Acres of Agricultural Land and Total Land Developed by MPO Region (2004-2014)



- Land Conservation: Between 2014 and 2017 lands conserved have steadily increased, except in Southern California and in Merced, San Joaquin, and Stanislaus Counties. The largest increases occurred in the Tahoe, Bay Area, Kern, and Sacramento regions.

Assumptions of land consumption in regional SCSs have varied in how well they compare to recent growth patterns.

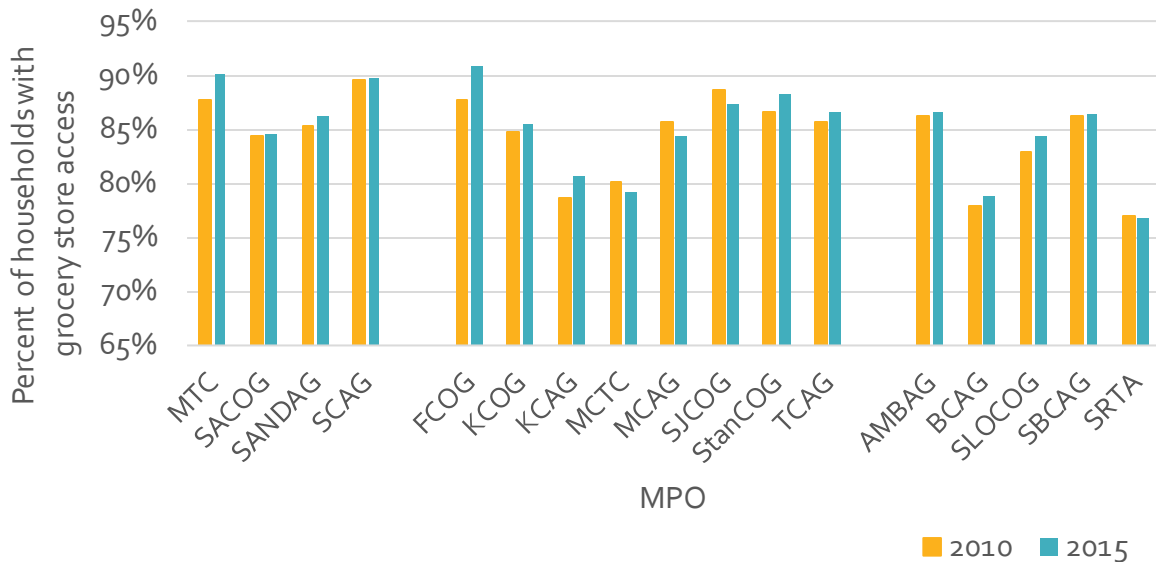
Eleven of 18 MPOs reported information on total developed land acres included in their adopted SCSs for 2020 and 2035. When comparing the reported information for the nearest year 2020 to the observed data gathered through year 2014, CARB found varied results amongst the MPOs. The SCSs for the largest MPOs assumed land consumption that is either in line or above the current trend. However, a number of Valley and smaller MPOs assumed growth patterns would be more compact, especially for the latest period from 2012-2014. If urban expansion is indeed again on the rise and barriers to infill development continue, it may be challenging for those later regions to achieve the land use patterns included in their SCSs.

ARE WE BUILDING NEIGHBORHOODS THAT ARE ACCESSIBLE TO DAILY NEEDS?

Some initial indicators show California’s neighborhoods are progressing toward providing daily needs within closer proximity to homes.

Most driving occurs for non-work travel, such as for shopping, school, and socializing. Increasing proximity of these destinations to people’s homes is one factor in helping to promote walking and cycling for these daily need trips. This report used grocery store access as a proxy for the extent to which neighborhoods provide easy access to daily needs.⁴⁶ The good news is that most Californians, approximately 88 percent, have grocery store access within one mile of their home if they live in an urban area or ten miles if they live in a rural area, and proximity is increasing.⁴⁷ Access was best in the Bay Area and Southern California regions, and Fresno County. Access generally improved between 2010 and 2015, except in Madera, Merced, San Joaquin, and Shasta counties.

Figure 13. Change in Grocery Store Access by Region



Source: USDA Food Environment Atlas

⁴⁶ Grocery stores in this project were stores that “reported at least \$2 million in annual sales and contained all the major food departments found in a traditional supermarket, including fresh meat and poultry, dairy, dry and packaged foods, and frozen foods.”

⁴⁷ This distance reflects the data available and may or may not be the ideal distance metric to reflect accessibility.

BEYOND THE NUMBERS: WALKABLE COMMUNITIES



Amanda lived in Orange County and Los Angeles for her entire adult life and never had a commute to work that was less than an hour. At her last position, she drove 1.5 hours each way in traffic, from Long Beach to Los Angeles, for a total of 3 hours in the car. "I was exhausted by the time I got home. I lived in this great community, but I was too tired to experience it. I said no to friends all the time. I basically came home and went to bed." Amanda's diet consisted of a lot of fast food and little exercise, which started to impact her health and quality of life. Unable to find an affordable apartment closer to her job or a well-paying job closer to her apartment, Amanda decided to accept a position in Sacramento, a smaller and more affordable city, and found an apartment close to work. Her commute went from 1.5 hours one-way, to a 10 minute bike ride. After just a few months, she was able to get rid of her car and saw a major improvement in her mental, emotional, and physical health. "I'm not trapped in the car anymore. In fact, I don't even own one – the battery kept dying because I hardly drove it. I actually get home at a decent hour now, with plenty of energy to cook dinner or meet friends after work. My exercise is my commute. And I don't have to worry about my car, I ended up saving a lot of money not paying for maintenance, gas, or insurance."

Research is beginning to find ways to measure the health impacts of walkable communities and short commutes. For example, in *Bowling Alone*, Robert Putnam identifies long commutes as a key predictor of social isolation. Research shows that people with long commute times suffer from disproportionate pain, stress, dissatisfaction, and there is a strong correlation with obesity.⁴⁸ Sitting in traffic has also been shown to increase the risk for heart attack and stroke.⁴⁹ However well-documented these associations are, the numbers alone cannot fully convey the benefits of walkable neighborhoods that allow for short commutes, convenient errands on foot or by bike, and having extra time to devote to hobbies or spend with family and friends. The joy and satisfaction that these can bring to a person's life are ultimately immeasurable, but nonetheless important reasons for policymakers to support the ability of all Californians to access the benefits of living in compact, high-amenity areas.

WHAT DO WE NOT KNOW YET, AND WHERE IS ADDITIONAL WORK NEEDED?

Statewide public data on transit service and development locations is not available to track progress on implementation of transit-oriented development.

When exploring whether CARB would be able to independently monitor changes in transit-oriented development, CARB found data shortfalls related to both transit and development. Specifically, this included lack of a statewide public transit data layer, as well as available public information on building permit locations of new development.

Information on the proximity of retail, park, health care, and other services to communities is not available to track progress on neighborhood accessibility to daily needs. This report used grocery store access as a proxy due to limited available data sources, but there is a need for data and tracking of changes in other important indicators of neighborhood accessibility, such as neighborhood parks, retail density, health services, and education services. Additional data on neighborhood accessibility would also allow researchers to understand how demographics shift in response to the addition of more amenities, and what policies mitigate displacement of long-time residents.

Local jurisdictions are beginning to explicitly address equity issues in their planning but no one is tracking how these efforts tie to expanding access to opportunities and promoting transportation equity. One recent piece of legislation, Senate Bill 1000 (Leyva, Chapter 587, Statutes of 2016), “The Planning for Healthy Communities Act,” could accelerate action in this area. Further specific data on the types of local policies being adopted in General Plans as a result of this bill could be used to track local progress on planning in this area.

⁴⁸ McCormack, G., & Virk, J. September 2014. *Driving towards obesity: A systematized literature review on the association between motor vehicle travel time and distance and weight status in adults.* Preventative Medicine, Volume 66, P. 49-55.

⁴⁹ Nawrot, T., Perez, L., Kunzli, N., Munters, E., & Nemery, B. February 2011. *Public health importance of triggers of myocardial infarction: a comparative risk assessment.* The Lancet, Volume 377, Issue 9767, P. 732-740.

Challenges and Opportunity Areas

The data analysis in this report reveals that California is off-track from hitting its SB 375 targets, and that the state as a whole – at the State, regional, and local levels – is not making the systemic and structural changes to building and investing in communities that are needed to meet the State’s climate goals.

During preparation of this report, CARB interviewed a number of transportation and land use planning planners and stakeholders to understand the challenges that must be overcome to advance progress on SB 375 implementation. One consistent message CARB heard was that there continues to be a pervasive and longstanding disconnect between the factors that shape regional growth and development – such as transportation investment, regulatory and housing market conditions at the local, regional, and state levels – and the state’s environmental, equity, climate, health, and housing goals. While SB 375 focused its efforts on MPOs and initiating change in the way planning for growth and travel occurs, structural changes and additional work by all levels of government are still needed to implement what regions have identified to be needed strategies. Staff and elected officials of local, subregional, regional, and state government bodies all have critical authorities and roles to contribute and could take steps to improve the outcomes now, via robust implementation of existing and emerging tools⁵⁰ as well as enacting new policy. But so far, as a whole, all actors responding rationally to the incentives, political forces, and policy restrictions in front of them, have not been able to enact the magnitude of change needed.

As this report’s findings suggest, state, regional, and local policymakers throughout California have a shared responsibility to work with communities to foster a policy environment needed to enhance the way we live and travel. The current structure of policies and lack of incentives will continue to produce and exacerbate the insufficient results outlined in this report, unless shared responsibility, changes in authority or mandates and incentives, and strong, deliberate, collaborative action is taken to change them. CARB finds that this disconnect impedes progress on attaining the SB 375 targets and their co-benefits. In light of this report’s finding that more ambitious and accelerated efforts are needed, CARB has not only included a discussion of these key challenges, as well as regional best practices for helping to address these challenges in response to the statute, but also incorporated suggestions on further opportunities and next steps to help overcome these challenges and get the state back on track.

⁵⁰ One example is Senate Bill 743 (SB 743, Steinberg, Chapter 386, Statutes of 2013), discussed more in the “Growth and the Housing Crisis” section.

To address these entrenched challenges, substantive changes are needed, with increased focus and leadership from the State, regional, and local agencies in close coordination. As a first step in this direction, CARB recommends the following key action:



CARB recommends that an interagency body involving the Secretaries and Chairs of key California agencies and Commissions, and representatives from regional and local governments produce and implement a new “State Mobility Action Plan for Healthy Communities” that responds to this report’s findings on challenges, opportunities, and data gaps.

The State Mobility Action Plan for Healthy Communities (MAP for Healthy Communities) should identify near- and long-term actions to help address the challenges identified in this report to increase and sustain progress toward the SB 375 targets. It should identify (a) responsible parties at the State, regional, and local levels; (b) timelines for work on state policy, investment strategy, data and information collection and distribution; and (c) recommended improvements to state law, including but not limited to any revisions needed to SB 375. The plan should be developed through a collaborative process with appropriate state agencies, regional and local leaders, industry experts, and the public. It should build upon key recent reports including *The Governor’s Environmental Goals and Policy Report*⁵¹ and CARB’s *2030 Scoping Plan Update*.⁵² It should also build upon the work of existing state interagency bodies that are equipped to address intersections of housing, transportation, and land use policy.

As a starting point, this section identifies eight challenge and opportunity areas, which can serve as action areas for the recommended MAP for Healthy Communities effort. These include (1) State funding for transportation and development projects; (2) growth and the housing crisis; (3) under-served communities; (4) traveler incentives; (5) transportation pricing; (6) new mobility; (7) data and research needs; and (8) limitations of SB 375. For each challenge and opportunity area, CARB summarizes information gathered through stakeholder discussions during preparation of this report on what actions are already being taken, where there are potential opportunities to address each challenge, and ideas that can be considered for next steps.

⁵¹ Governor’s Office of Planning and Research. November 2015. *A Strategy for California @ 50 Million: Supporting California’s Climate Change Goals - The Governor’s Environmental Goals and Policy Report*. Retrieved from http://www.opr.ca.gov/docs/EGPR_Nov_2015.pdf.

⁵² In addition to the main body of the Scoping Plan, see also: California Air Resources Board. November 2017. *Appendix C: Vibrant Communities and Landscapes and Potential State-Level Strategies to Advance Sustainable, Equitable Communities and Reduce Vehicle Miles of Travel (VMT)*. Retrieved from https://www.arb.ca.gov/cc/scopingplan/2030sp_appc_vmt_final.pdf.

State Funding For Transportation and Development Projects

ISSUE: The State’s role in developing regional and local plan funding guidelines – and in some cases, project selection – for transportation and development projects that utilize State money, offers an opportunity to improve the alignment of the projects that are approved and eventually constructed with the State’s health, equity, economic, conservation, and climate goals.

OPPORTUNITY AREA: Identify, review, and revise relevant State transportation, housing, and climate-incentive funding guidelines and plans to: 1) link these funds to encourage equitable growth in housing and transportation that is better aligned with State planning priorities (AB 857);⁵³ 2) fund clean transportation options such as public transit, active transportation, new mobility innovations, and traveler incentives, particularly for low-income communities, 2) link these funds to housing goals and encourage equitable growth that is better-aligned with 3) prepare for climate change by creating more resilient communities, infrastructure, and natural land; and 4) identify opportunities to require further scrutiny and introduce local decision-support tools when considering funding project types with poor performance on VMT, greenhouse gas emissions, and other health, equity, and conservation goals.

KEY CHALLENGES

CARB heard in numerous interviews and workshops that a critical test of SB 375’s progress is whether investments have shifted in ways that improve transportation choices, especially those that make it easy for people to drive less. Improving the alignment of funding, especially transportation funding, with State and regional goals is seen as a necessary strategy for success. Yet aligning funds with climate, health, and other goals can be a challenge.

Few transportation-funding sources exist that prioritize climate mitigation or VMT reduction. Some programs, particularly those funded by the Greenhouse Gas

⁵³ AB 857 (Wiggins, Chapter 1016, Statutes of 2002) established State planning priorities to promote infill development for people of all incomes, protect natural resources and farmland, and grow efficiently.

Reduction Fund, do focus on greenhouse gas emissions reductions. And recently, the Road Repair and Accountability Act of 2017 (SB 1) made significant and supportive

"There is a fundamental disconnect in trying to align transportation policy and climate policy. We receive federal funds that all have specific goals and purposes, which are not climate. Yet we try so hard in California to make it fit, but it is very difficult."

- Kome Ajise

Director of Planning

Southern California Association of Governments

shifts away from past transportation packages. These included focusing the majority of funds on fixing existing infrastructure, while including historic increases in transit investments, and doubling active transportation program investments. CARB heard that these funds were absolutely essential for regions and cities. SB 1 also includes statutory provisions that require its competitive multi-modal funding programs in which highway expansion might also be funded to be restricted to only MPOs with an SCS that CARB has determined will meet the greenhouse gas emissions reduction targets. Other

State investments including High Speed Rail and those funded via cap-and-trade have also increased investment in clean transportation solutions.

But looking at State transportation funding in particular, structural factors make it difficult to align SCS planning and transportation funding allocations. Many transportation-spending decisions are not controlled by the MPOs who create the regional plans to achieve the SB 375 climate goals.⁵⁴ Caltrans, the California Transportation Commission (CTC), county authorities such as County Transportation Commissions, transit agencies, and local jurisdictions all hold decision-making authority over transportation funds.

Also, twenty-four counties across California have passed local transportation sales tax measures, which comprise a significant portion of many regions' transportation funds.⁵⁵ These measures often list specific projects, locking them in for years or decades. Often, these measures do not fully fund their listed projects, and go on to capture a

⁵⁴ As of 2011, only 10 percent of transportation funding was under MPOs' direct control, ranging from 0 percent in SCAG to over 70 percent in Stanislaus. See: Rose, E. May 2011. *Leveraging a New Law: Reducing Greenhouse Gas Emissions under Senate Bill 375*. Center for Resource Efficient Communities: Berkeley, CA. Retrieved from https://www.ca-ilg.org/sites/main/files/file-attachments/leveraging_a_new_law.pdf.

⁵⁵ In 2018-2019, almost half of transportation funds in the State were local sources, including sales taxes along with local general funds, transit fares, and other local revenue. See: Legislative Analyst's Office. June 2018. *California's Transportation System*. Retrieved from <https://lao.ca.gov/reports/2018/3860/californias-transportation-060418.pdf>.

region's otherwise-flexible State and Federal funds. In some regions, these measures have been remarkably supportive of SB 375 goals, while not in others. Some of these measures do include explicit methods for making changes to their project lists, but regional and local leaders hesitate to diverge from the original proposal to voters, even if prevailing evidence suggests the project will not perform as originally expected, or that surrounding circumstances have changed (e.g., the emergence of State climate policies) to make another approach better.

"We need to more aggressively align our transportation policies and investments with our climate change goals. Focusing on cleaner transportation modes and prioritizing these investments in our most economically disadvantaged communities will help us turn this corner towards achieving climate equity and a healthier California for all."

*- Assemblymember Eduardo Garcia (D-56)
California Assembly*

Some stakeholders wondered whether more of the regional transportation budgets could be used to deliver SB 375 supportive projects.⁵⁶ CARB heard from State and regional transportation staff, however, that many transportation funding sources could not shift, either for legal or practical reasons. Specifically, considerations such as requirements for reporting and timing, as well as constitutional limitations such as Article 19 impede use of funds for these purposes. CARB also heard that it will be important to prioritize and set

aside money for strategic projects that can build the transportation system of tomorrow, given that maintenance backlogs may continue to grow despite SB 1's significant strides to address that shortfall.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

A number of MPOs across the State have begun implementing practices to help work around and overcome these challenges. Some of the best practices that individual regions have undertaken, all of which are described in further detail in Appendix C, include:

- Prioritizing certain transportation projects for funding by their performance toward multiple regional goals (e.g., greenhouse gas emissions reductions, health, equity, conservation).

⁵⁶ For example, some advocates point to the regional portion of the State Transportation Improvement Program, which can fund active transportation and some types of public transit investments.

- Frontloading transportation projects that promote VMT reduction.
- Putting policies in place to mitigate highway capacity increases with measures that reduce VMT.
- Creatively engaging the public, such as by providing funding for underserved communities to help identify transportation needs and prioritize projects.

While increased uptake of regional practices identified above can help, further work by State, regional, and local partners is also needed to better align available funding sources (e.g., transportation, housing, and climate-incentive funds) for transportation and development projects with the State’s health, equity, conservation, and climate goals.

OPPORTUNITIES AND NEXT STEPS

In June 2018, per the requirements of AB 179,⁵⁷ CTC and CARB held the first of two joint meetings for the year, during which the Commission and Board jointly identified a key area of future joint work to be further aligning State transportation funds with climate goals. The CTC oversees many transportation funding programs across the State, while CARB oversees development and implementation of the State’s climate and air quality programs.

As a next step for productive collaboration on this topic, CTC and CARB – along with other State agencies such as the California State Transportation Agency (CalSTA), Caltrans, SGC, and HCD – should work together through their AB 179 joint meetings, in collaboration with

regional and local partners, to inform and initiate appropriate actions that help better align State funding guidelines and funding decisions with crucial climate, health, equity, and conservation goals by:

"It's time to invest our transportation dollars to meet our climate goals. It's time to invest in low income communities and communities of color. We need to make a choice to shape California's future toward the future we want."

*- Chanell Fletcher
Director
ClimatePlan*

⁵⁷ AB 179 (Cervantes, Chapter 737, Statutes of 2017).

- Identifying relevant State transportation, housing, and climate-incentive funding pools, for which the State sets guidelines, plans, and/or establishes performance measures for review.
- Setting forth guiding principles on review and revision of relevant funding pools that help identify opportunities to: 1) link these funds to encourage equitable growth in housing and transportation that is better aligned with State planning priorities (AB 857); 2) fund clean transportation options such as public transit, active transportation, new mobility innovations, and traveler incentives, particularly for low-income communities, 3) prepare for climate change by creating more resilient communities, infrastructure, and natural land; and 4) introduce requirements and local decision-support tools to support further review of projects that do not align with VMT, greenhouse gas emissions, and other health, equity, and conservation goals.
- Initiating work to monitor how identified funding sources are being deployed over time in order to understand how they are changing or not changing to align with the current direction.

Growth and the Housing Crisis

ISSUE: Not enough housing is being built for people at every income level, but especially for lower-income households, driving up costs and lengthening commutes. Furthermore, where housing is being built, it is not well aligned with State planning priorities to promote infill development for people of all incomes, protect natural resources and farmland, and grow efficiently.

OPPORTUNITY AREA: Assess what additional incentive (e.g., resources for local planning, funding for enabling infrastructure, financing mechanisms for transit-oriented and transit-ready development, etc.), local decision-support tools, regulatory, and other legal mechanisms can be put in place to increase homes in high-opportunity areas for low-income households, to protect renters, and to make it easier to build homes in places aligned with the State’s planning priorities (AB 857), SCS goals, and Regional Housing Needs Allocation (RHNA) goals.⁵⁸

KEY CHALLENGES

Cities and counties hold near-exclusive authority to regulate land use.⁵⁹ In discussions about why SB 375 implementation might fall short of goals, interviewees highlighted MPOs’ inability to control land use and pointed to local decisions that do not align with regional goals, such as allowing leapfrog development out in natural or agricultural areas, and failing to allow enough infill, especially affordable housing and growth in walkable or transit-oriented areas.

A particularly strong theme in the interviews was the housing shortage. Many people interviewed identified lack of housing supply in key places as the root cause of many of our transportation challenges.

⁵⁸ Gov. Code § 65584(d) and §65583(c)(5)

⁵⁹ SB 375 law states “Nothing in a sustainable communities strategy shall be interpreted as superseding the exercise of the land use authority of cities and counties within the region” (Gov. Code. § 65080(b)(2)(J)). The land use pattern must reflect the most recent planning assumptions considering local general plans and other factors (Gov. Code § 65080(b)(2)(B)). . . . Nothing in this section shall require a city’s or county’s land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy” (Gov. Code § 65080(b)(2)(K)).

The current imbalance in housing supply in California can be attributed to many factors that are prevalent across the US, including the 2008 recession. However, California's housing shortage is particularly acute due to our unique regulatory and taxation structures. Contributing policies include:⁶⁰

- Zoning restrictions that have led to a shortage of sites that allow high densities
- State and local tax and revenue structure that favors large scale retail over housing
- Variable, uncertain, and misaligned impact fee structures for new development
- Poorly calibrated, unenforced, or absent inclusionary housing and tenant-stabilization policies
- Lengthy, costly, and unpredictable review processes fueled at times by neighborhood opposition

"Business leaders and Bay Area residents tell us that rising traffic and housing costs are doing serious damage to our quality of life. We have to address them before they start to seriously impact our economy. These problems are intertwined—we cannot solve our transportation problems without addressing our housing problems. We can do it, but it will take bold thinking and decisive action."

*- Matt Regan
Senior Vice President, Public Policy
Bay Area Council*

AB 857 established State planning priorities: (a) to promote infill development and equity by improving existing infrastructure, particularly underserved areas, (b) to protect environmental and agricultural resources by protecting and enhancing the most valuable resource lands, and (c) to encourage efficient growth.

Builders interviewed for this project told CARB that building within existing communities continues to be more costly and difficult than building on greenfield parcels at the edge of town. Upgrading civic infrastructure in existing communities is more costly and difficult to finance than building new infrastructure. They report that regulatory and

⁶⁰ See: (1) O'Neill, M., Gualco-Nelson, G., & Biber, E. *Getting it Right: Examining the Local Land Use Entitlement Process in California to Inform Policy and Process*. February 2018. Retrieved from https://www.law.berkeley.edu/wp-content/uploads/2018/02/Getting_It_Right.pdf. (2) Mawhorter, S., Garcia, D., & Raetz, H. March 2018. *It All Adds Up: The Cost of Housing Development Fees in Seven California Cities*. Retrieved from <https://turnercenter.berkeley.edu/development-fees>. (3) California Department of Housing and Community Development. February 2018. *California's Housing Future: Challenges and Opportunities*. Retrieved from http://www.hcd.ca.gov/policy-research/plans-reports/docs/SHA_Final_Combined.pdf.

fiscal reform is needed if a market-driven system like real-estate development is to produce the desired results.

The issues listed above are primarily State and local issues. While MPOs do create SCSs that forecast regional growth patterns, local staff and elected officials have almost exclusive authority over land use decisions. Local agency staff told CARB that SCSs' impact on local planning decisions to date are minor, echoing other studies.⁶¹ But interviewees did cite the importance of MPOs' RHNA allocations. One recent study documented how the Bay Area successfully increased affordable housing in jobs-rich locations following a change to its RHNA.⁶²

"As a developer, I know first-hand that there are too few of my colleagues who are doing their projects in a sustainable way. They are simply trying to get good infill projects approved and financed and trying not to get sued under CEQA. They're not asking MPOs for anything. They're asking the cities who control land use decisions. If the State helped cities update their plans to be in alignment with the SCS, then elected officials could say to builders, 'this is what we're requiring.' The builder might check with the next town, but if the next town said that also, then you'd see a serious change in development in the state. But you need critical mass among cities to see real sustainable design from most developers."

*- Curt Johansen
Board of Directors President
Council of Infill Builders*

Local agencies cite the cost of planning and infrastructure as key challenges. While updating general plans and creating specific plans for areas such as near transit can make the development process more efficient, such work can cost millions of dollars, which local agencies often do not have. These plans can then be difficult to implement,

⁶¹ In a 2017 survey, a majority of county and city planning managers report that SB 375 had little to no influence on their adoption of the eight smart growth zoning strategies studied. But it also found that local government participation in developing an SCS and local understanding of the SCS "appear to increase the likelihood of smart growth oriented zoning" in those jurisdictions. See: Sciarra, G.C. & Strand, S. August 2017. *When Do Local Governments Regulate Land Use to Serve Regional Goals?: Results of a Survey Tracking Land Use Changes that Support Sustainable Mobility*. National Center for Sustainable Transportation and UC Davis Institute of Transportation Studies. Retrieved from https://ncst.ucdavis.edu/wp-content/uploads/2015/10/NCST-TO-025-Sciara-Tracking-Land-Use-Changes_FINAL-August-2017-1.pdf

⁶² When the Bay Area shifted its approach to allocating more growth to jobs-rich areas, local jobs-housing balance improved by 104 percent, affordable housing outpaced market-rate housing in jobs-rich places, and more affordable housing was built in jobs-rich areas there than in San Diego or LA. The Bay Area has also adopted several ambitious strategies that likely helped yield this result. See: Palm, M. & Niemeier, D. 2017. Achieving Regional Housing Planning Objectives: Directing Affordable Housing to Jobs-Rich Neighborhoods in the San Francisco Bay Area. *Journal of the American Planning Association*, 83:4, 377-388, DOI: 10.1080/01944363.2017.1368410

in part due to a lack of funding for civic infrastructure, especially since the costs of infill development are often higher than the costs of greenfield development.

The State does provide some planning and infrastructure funds:

- SB 1 increased funding available via Caltrans' Sustainable Transportation Planning Grant program. On top of the approximately \$9.5 million already available annually, approximately \$25 million was added to support and implement SCSs and achieve the State's greenhouse gas reduction targets.

- SB 2 provides a permanent source of funding intended to increase the affordable housing stock in California. In the first year (2019), 50 percent of the revenue will be used to establish a program that provides financial and technical assistance to local governments to update planning documents and zoning ordinances in order to streamline housing production, including, but not limited to, general plans; community plans; specific plans; implementation of SCSs; and local coastal programs.

"Climate change, California's housing crisis, and our growing infrastructure deficit are interconnected. We must invest our limited resources in integrated strategies that address these challenges together. We can grow in ways that advance economic development, improve public health, reduce climate emissions, and contribute to the vibrancy and equity of our diverse communities. Integrated solutions—like supporting growth in walkable, transit-served areas—should be at the core of our state's strategy moving forward."

- Kate Meis

Executive Director

Local Government Commission

- Cap-and-trade dollars through the California's Climate Investment (CCI) Program provides funding primarily for community infrastructure and affordable housing largely via Strategic Growth Council administered programs including the Affordable Housing and Sustainable Communities (AHSC), Transformative Climate Communities (TCC) and the Sustainable Agricultural Land Conservation (SALC).

Views shared during interviews identified that the process of applying for some funds can be cumbersome and expensive, with uncertain benefits. Twenty-five to 35 percent

of local jurisdictions surveyed in 2017 were not aware of key State funding programs.⁶³ The California State Library is now working to develop a clearinghouse of state funding programs that can help address this information gap pursuant to Assembly Bill 2252.⁶⁴

Some MPOs report that one State decision, the elimination of redevelopment agencies in 2012, continues to have a major impact. Redevelopment agencies facilitated tax-increment financing for new development and also allowed cities to assemble parcels and fund infrastructure. One-fifth of their financing was required to subsidize affordable housing. While legislation has restored certain powers of redevelopment, agencies reported continued implementation challenges.

In 2017, the Legislature passed and Governor Brown signed a package of 15 housing bills designed to address the housing shortage and affordability crisis. In particular, interviewed stakeholders highlighted SB 35⁶⁵, which requires certain localities to offer developers a new ministerial approval process for developments that meet certain requirements. It is too soon to know what net effect these new tools will have on the backlog of affordable housing need. But given the magnitude of current housing shortfalls and the limitations of streamlining policies, such as requirements that raise construction costs beyond what some markets may support, more tools that directly address California's biggest housing challenges will almost certainly be needed.

Interviewees also told CARB that SB 743⁶⁶ may ease one barrier to transit-oriented and infill development and push development in high-VMT areas to reduce its VMT with mitigation measures. It will change CEQA analysis of transportation impacts to better align with the goals of SB 375, removing measures of auto delay such as "level of service" to determine significant environmental impacts, and replacing them with analysis of VMT.

⁶³ Sciara, G.C. & Strand, S., 2017.

⁶⁴ AB 2252 (Limón, Chapter 318, Statutes of 2018).

⁶⁵ SB 35 (Wiener, Chapter 366, Statutes of 2017).

⁶⁶ SB 743 (Steinberg, Chapter 386, Statutes of 2013).

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

Some regions have developed effective approaches to influence local policymaking, and to help fund planning, community infrastructure, and affordable housing. These include the following best practices, which are detailed more in Appendix C:

- Building regional consensus on key topics, such as where growth should and should not go, or on new policy tools to address the affordable housing crisis.
- Allocating certain transportation funds in ways that support or incentivize key efforts via competitive grants that reward performance, eligibility requirements, and directly funding or establishing a revolving loan fund for key activities.

"I think MPOs, with help from ARB and CTC, could encourage cities to do the right thing by providing them funding. And I think we have done that in the past, and it works. I think many cities, if you incentivize them, will be willing to do the right thing."

- Hasan Ikhata

Outgoing Executive Director

Southern California Association of Governments

- Assisting local agencies in utilizing SB 375's CEQA streamlining provisions.
- Creating regional structures for funding land conservation and restoration.
- Educating local jurisdictions about the health, economic, equity, and conservation benefits of RTP scenarios and particular growth strategies.
- Forecasting and tracking displacement risk.

OPPORTUNITIES AND NEXT STEPS

To address the critical housing shortage additional effort is needed to improve regulatory, incentive, and other legal mechanisms for projects that provide more affordable housing choices near jobs, transit, and other high-opportunity locations. Some next steps to consider in this area include:

- Assessing what additional support could be offered at the regional and local levels to jumpstart development in areas where development has been identified

as supporting the State’s planning priorities and SCS goals (e.g., support for local planning, development of local decision-support tools, funding for enabling infrastructure, financing mechanisms for transit-oriented and transit-ready development, etc.).

- Building upon work that CARB and the Governor’s Office of Planning and Research (OPR) began this year (2018) to provide guidance and evidence that developers and local jurisdictions can use to show how well-designed, transportation-efficient, and affordable projects comply with CEQA and State greenhouse gas emissions reduction goals for housing development in California.
- Developing and maintaining a catalogue tracking current State regulations and incentives impacting the growth decisions of local agencies and builders, with particular attention to how they relate to providing strategic growth and affordable homes and preventing displacement.

Under-Served Communities

ISSUE: Regional SCS planning offers an opportunity to redress a range of important issues of social and transportation justice, rural mobility, public health, and quality of life for people of all incomes. State bodies can improve their ability to monitor and promote regional equity across the issues that an RTP/SCS addresses.

OPPORTUNITY AREA: Develop a state vision for increasing travel choices, economic development and access to jobs and other opportunities, as well as affordable housing for under-served communities – and by doing so, accelerate progress on state climate, infill, health, and equity benefits.

KEY CHALLENGES

SB 375, as a law, focuses on the reduction of greenhouse gas emissions. Many SCS plans forecast that their implementation will also promote public health and more livable communities, improve access to opportunity, and reduce households' housing and/or transportation costs.

However, this report found that positive change is occurring slowly in greenhouse gas emission reductions and other areas. Meanwhile, concerns about the cost of housing and transportation rise, and the gap between income groups continues to grow rapidly. Without efforts to monitor and improve implementation, regions may not succeed at meeting these important goals. As outlined above, data gaps often existed for these issues.

Questions of regional equity are particularly important given the unresolved history of racism, discrimination, and segregation in land use and transportation policy. Fifty years after redlining became illegal, its impacts can still be seen in neighborhood demographics and wealth disparities.⁶⁷ Highway construction, “slum clearance,” and white flight resulting from federal laws from the 1950s and beyond have contributed to the regional land use patterns and fiscal inequalities that exist today. Alarm bells have been raised about the “suburbanization of poverty,”⁶⁸ as some evidence shows there

⁶⁷ National Community Reinvestment Coalition. March 2018. “HOLC ‘Redlining’ Maps: The Persistent Structure of Segregation and Economic Inequality.” <https://ncrc.org/holc/>

⁶⁸ Urban Habitat. November 2016. “Race, Inequality, and the Resegregation of the Bay Area.” <https://urbanhabitat.org/sites/default/files/UH%20Policy%20Brief2016.pdf> Link to Urban Habitat report here

has been a significant increase nationally in poverty in suburban areas and that, as of 2015, more there were more poor residents living in suburbs than in cities.⁶⁹

The disparities between communities in California remain vast. One study by the Joint Center for Political and Economic Studies and Fresno State's Central Valley Health Policy Institute found that life expectancy in the San Joaquin Valley varies by zip code by 21 years, with the rate of premature death in some zip codes nearly double that of others.⁷⁰ Rural communities

throughout the state continue to lack access to transportation options, healthy drinking water, sewer and other civic infrastructure, even as infrastructure services are extended elsewhere.

SB 375 regional SCS development and implementation can affect equity in a number of ways. Below, CARB poses questions about how and whether various features of transportation and housing planning might affect equity.

"A lot of these programs tend to have urban centers in mind when they're created, not the needs of rural areas where walking, biking, and transit are not very realistic. Greenhouse gas reductions cannot come at the expense of disadvantaged rural communities losing options and mobility."

*- Mariah Thompson
Staff Attorney, Community Equity Initiative
California Rural Legal Assistance, Inc.*

- Transportation projects: Are transportation project investments in the RTP/SCSs harming vulnerable communities, as the highway expansions of the 1950s did? Do they reflect an equitable distribution of benefits to under-served communities? Are the identified projects for low-income and under-served areas ones that community residents have identified as helpful in meeting their needs?
- Neighborhood improvements: As localities engage in SB 375 supportive place-making and revitalization efforts, are these efforts benefiting low-income communities and communities of color? How does a focus on urban strategies such as infill, pedestrian, and transit-oriented development affect low-income rural communities? Are residents being given meaningful opportunities to engage in decision making around the future of their communities?

⁶⁹ "The Changing Geography of US Poverty, Elizabeth Kneebone, Senior Fellow at Brookings Institution, congressional testimony, Feb. 15, 2017 <https://www.brookings.edu/testimonies/the-changing-geography-of-us-poverty/>.

⁷⁰ Joint Center for Political and Economic Studies; Fresno State's Central Valley Health Policy Institute. 2012. *Place Matters for Health in the San Joaquin Valley: Ensuring Opportunities for Good Health for All*. Retrieved from <https://jointcenter.org/sites/default/files/PM%20English.pdf>.

- Secure, affordable housing: Is market-rate and affordable housing being planned and built in neighborhoods with access to opportunities like jobs, high-quality education, and transportation? As investments improve existing communities, are current residents able to benefit, or do rising rents push them out?
- Air quality: As transportation investments shift travel patterns and hopefully reduce VMT, will air quality improve or worsen in the communities that are already most burdened by pollution?

Recent legislation has improved the State’s ability to engage in these issues to improve regional equity. In 2018, legislation amended both the RHNA and housing element requirements. Assembly Bill 686⁷¹ requires public agencies to administer programs and activities related to housing and community development in a manner to affirmatively further fair housing, and to not take any action that is inconsistent with this obligation., and Assembly Bill 1771⁷² amended the methodology for RHNA to give greater consideration to equity factors and how distribution may affect the opportunity for low- and very-low income households.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

Many MPOs have conducted environmental justice and social equity analyses in their SCSs. Under federal regulation and State laws, regions must analyze, plan, and implement transportation system improvements that will provide a fair share of benefits to all residents, regardless of race, ethnicity or income level. The 2017 RTP Guidelines for MPOs⁷³ update by the CTC include Title VI Rights Act and other environmental justice considerations in RTP/SCS development.

"All Californians deserve cleaner air and shorter commutes. As we plan for climate resilience and sustainability we need to ensure clean air and better transportation alternatives in communities most affected by climate change. For California to strengthen its climate leadership, we must keep the needs of low-income communities at the center of our work."

- Senator Ricardo Lara (D-33)
California Senate

⁷¹ AB 686 (Santiago, Chapter 958, Statutes of 2018).

⁷² AB 1771 (Bloom, Chapter 989, Statutes of 2018).

⁷³ http://www.dot.ca.gov/hq/tpp/offices/orip/rtp/index_files/2017FINALDraft_MPORTPGuidelines.pdf.

Furthermore, the statutory goals of the Regional Housing Needs Allocation (RHNA) process were amended in 2018 to require every jurisdiction to “promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, familial status, or disability.”⁷⁴

Best practices in this area thread throughout the sections above and provide a foundation upon which to build. They seek to ensure that transportation investments improve public health, engage under-served communities in identifying projects to meet their unique transportation needs and then funding them, promote affordable housing and tenant-protection policies, improve air quality and access to services, and meet the needs of rural residents. SANDAG has recently been leading a process to develop a Social Equity Analysis Methodology and Tool (SEAM / SEAT) including a standard set of performance measures that other MPOs can use. See Appendix C for more detail.

OPPORTUNITIES AND NEXT STEPS

Currently, each region addresses these issues differently and in varying depth. In order to increase travel choices, economic development, access to jobs and other opportunities, affordable housing for under-served communities, and to reverse historic and systemic injustices, including health inequities that result in significant health disparities between populations,^{75,76} development of a State vision and strategy for advancing equity through State transportation, housing, and climate and air quality outreach, planning, and funding activities is needed.

Development of a state equity strategy for the areas identified above should balance state planning priorities for growth⁷⁷ and public health considerations, incorporate considerations from a review of best practices and cutting-edge efforts nationwide, as well as the input of communities directly. The strategy should outline ways to monitor

⁷⁴ AB 1397 (Low, Chapter 375, Statutes of 2018)

⁷⁵ Life expectancy in the San Joaquin Valley varies by zip code by 21 years. See: Joint Center for Political and Economic Studies; Fresno State’s Central Valley Health Policy Institute. 2012.

⁷⁶ “Health equity” is defined as efforts to ensure that all people have full and equal access to opportunities that enable them to lead healthy lives. “Health disparities” are the differences in health and mental health status among distinct segments of the population, including differences that occur by gender, age, race or ethnicity, sexual orientation, gender identity, education or income, disability or functional impairment, or geographic location, or the combination of any of these factors. “Health inequities” are defined as disparities in health or mental health, or the factors that shape health, that are systemic and avoidable and, therefore, considered unjust or unfair. Source: *Portrait of Promise: The California Statewide Plan to Promote Health and Mental Health Equity. A Report to the Legislature and the People of California by the Office of Health Equity*. Sacramento, CA: California Department of Public Health, Office of Health Equity; August 2015. Retrieved from http://www.ochealthieretogether.org/content/sites/ochca/CDPH_Portrait_of_Promise_Aug_2015.pdf.

⁷⁷ AB 857 (Wiggins, Chapter 1016, Statutes of 2002).

progress and advance state climate goals, as well as identify where development of local decision-support tools would be useful. Finally, special attention should be paid to strategies that help prevent the displacement of low-income communities and communities of color.

As a next step for productive collaboration on this topic, CTC and CARB – along with other State agencies such as CalSTA, Caltrans, OPR, SGC, and HCD – should continue to work together in collaboration with regional and local partners to inform and initiate appropriate actions related to their respective outreach, planning and funding activities by:

- Initiating development of best practice evaluation method/s, regular tracking, and statewide reporting mechanisms to monitor and inform planning on how transportation, housing and climate-incentive investments are expected to affect low-income residents' access to clean transportation and health in the most burdened places. As a starting point, begin developing best practices that agencies can use to assess community transportation needs based directly on community input and agreement on how to have these priorities rise to the top of near-term investment plans and transportation grant-making.

"When residents can envision a real opportunity to affect outcomes in the near term, in the form of investments or policies that address their priorities, they are much more likely to make time to engage, and in doing so bring forward solutions that benefit everyone."

*- Richard Marcantonio
Managing Attorney
Public Advocates Inc.*

- Building on and continue to actively pursue existing State efforts to promote low-income communities' access to clean transportation and mobility options (SB 350) and to reduce exposure to air pollution in disproportionately-burdened communities (AB 617) and further integrate them with work on SB 375.
- Initiating research that assesses the costs and benefits of different SCS-type growth and transportation strategies on low-income residents for future potential use in program implementation and reporting. For example, comparing multi-family or compact infill development with supportive transit, walk/bike, and road repair investments (in urban and rural settings), to single-family urban expansion with supportive highway and road-capacity investments.

- Working with the California Workforce Development Board to identify appropriate connections with their forthcoming work pursuant to AB 398,⁷⁸ to identify the need for increased education, career technical education, job training, and workforce development resources or capacity to help industry, workers, and communities transition to economic and labor-market changes related to state greenhouse gas emissions reduction goals.

⁷⁸ AB 398 (Garcia, Chapter 135, Statutes of 2017).

Traveler Incentives

ISSUE: Many efforts are underway to improve transportation networks and land use patterns, but some of these will take years to show results. In the near term, valuable gains could result from a focus on the traveler experience and providing incentives for consumers to walk, cycle, take public transit, or carpool now.

OPPORTUNITY AREA: Pilot test innovative ideas to speed the adoption of clean, efficient transportation solutions across the State (e.g., new traveler-oriented approaches to encourage behavior change, options for increasing funding to enhance transit operations for providers willing to support transit integration, contests between regions or transit providers).

KEY CHALLENGES

The data presented in this report show that in general, consumers are not changing their travel choices away from driving alone and toward walking, cycling, public transit, carpooling, and other options. Alongside long-term efforts to build infrastructure that makes alternatives to driving more accessible, reliable, safe, and convenient to navigate, a focus on what it will take to encourage more people to try these alternatives could accelerate progress toward State climate goals.

A number of simple and relatively low-cost solutions could improve non-auto travelers' experience. For instance, dedicated bike lanes and easy-to-access secure cycle parking can make cycling more safe and convenient. Transit stops could include weather shelters and amenities like water-filling stations. Clearly-marked pedestrian crosswalks can have count-down signals and mid-span safety features.

"There is not enough sense of urgency now, because 2035 feels so far away. We need to be asking – what strategies will deliver impacts in the next five years? How can we change travel behavior in the very near term?"

*- Amanda Eaken
Director, Transportation & Climate
Natural Resources Defense Council*

General consumer education, incentives, and offering support for those who would like to try alternatives to driving are areas ripe for innovation and learning from successful examples in other sectors. For instance, just as water and electricity districts have taken creative approaches to managing tight supply, such as providing small rebates for

the purchase of a water-efficient appliances or providing educational material on billing, transportation agencies could try new approaches to managing limited road capacity.

Transportation agencies could also learn from private-sector marketing, where new product promotions involve efforts like sales, free samples, peer-referral rewards, loyalty benefits, and more. Transportation solutions might explore deploying strategies developed following the mobile revolution for rewarding consumers, gamifying daily life, and exerting positive peer pressure. Smartphones could allow consumers to opt in to receive alerts and small rewards. Transportation investments might be used to subsidize commuter bike purchases, provide thank-you points to commuters who shift to transit or to consistently travel at off-peak periods, and offer other forms of social and material encouragement.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

MPOs have demonstrated success in testing new approaches for encouraging consumers to try alternative modes. Some of the best practices undertaken by various individual regions, all of which are described in further detail in Appendix C, include:

- Providing grants and toolbox resources to local agencies and individuals to encourage use of innovative transportation demand management strategies, such as Guaranteed Ride Home programs, parking management, new technology, and marketing.
- Partnering with TNC companies to provide free carpool ride experiences.
- Aligning transit services around a single payment system, thereby easing travel and facilitating employer subsidies and other incentive programs.
- Partnering with builders to provide car-share and other alternative travel choices especially at affordable housing developments.

OPPORTUNITIES AND NEXT STEPS

CARB heard from a number of MPOs and other stakeholders that much more remains to be done in this area, with needs in the near-term for additional pilot-testing to advance policy. Providing funding for regions and localities to explore and quantify the benefits of targeted consumer-based VMT-reduction incentives and provide education to local residents could accelerate progress in this area. In addition, increasing transit operations funding, the lack of which was repeatedly highlighted as a limiting factor, could also be valuable.

Transportation Pricing

ISSUE: As cars become more fuel-efficient and the use of zero emission vehicles increase, California’s fuel-based transportation system will receive declining revenues, with costs falling more heavily on lower-income drivers who own older vehicles. Adjusting price signals in ways that make it cheaper to travel via carpool, public transit, and active transportation than to drive alone can provide a powerful incentive to shift travel patterns, reduce congestion, and more equitably and sustainably fund the transportation system as a whole.

OPPORTUNITY AREA: Develop fiscally-sustainable and equitable methods of funding the transportation system, in ways that increase climate-friendly travel choices for everyone and incentivize shifts in travel behavior by building upon the findings of the California Road Charge Pilot Program, enabling further pilot-testing of alternatives to the gas tax, and examining other fee structures that touch on the broad set of costs people incur to access the transportation system (e.g., lower-cost transit passes, parking, per-mile car insurance, and TNC pricing that encourages pooling).

KEY CHALLENGES

Traditionally, California has funded the construction and maintenance of its extensive system of highways, local roadways, and bridges in large part through taxes on the fuel that drivers purchase to use this infrastructure, also known as a gas tax. Until the passage of SB 1, the gas tax had not been updated for inflation since 1994.⁷⁹ SB 1 made valuable strides toward more sustainable funding for road and bridge repair by adjusting the fuel tax for past inflation, returning it to its historic levels, and tying it to inflation going forward.

However, as part of California’s work to address climate change, the State has required automobiles to become more fuel-efficient and required an increasing number of zero emission vehicles (ZEVs) in California. The *2030 Scoping Plan Update* also sets a goal of having 1.5 million ZEVs on the road by 2025 and 4.2 million ZEVs by 2030. Because ZEVs and fuel-efficient vehicles require less gasoline fuel, per-capita revenues will decline over time, threatening the State with future shortfalls for road and bridge maintenance and other important transportation investments.

⁷⁹ CalSTA and Caltrans. 2017. *California Road Charge Pilot Program 2017 Highlights*. Retrieved from http://www.dot.ca.gov/road_charge/resources/final-report/docs/highlights.pdf.

The funding system may also grow less equitable. As more affluent residents buy newer, more fuel-efficient vehicles, the costs of funding the transportation system could fall more heavily on low-income residents, compared to a system in which drivers pay in proportion to their use of the roadways.

Recognizing these challenges, the Legislature passed SB 1077⁸⁰ directing the CalSTA, with support from the CTC, to conduct a road-usage charge pilot study, exploring a road-usage charge in which users pay per mile that they drive, instead of per gallon of fuel used. This pilot study was a clear success, with 81 percent of participants feeling that a road-usage charge should continue to be researched.⁸¹

Alternative pricing techniques can also be an important tool for cities or regions seeking to address congestion. When too many cars get on the roadway, traffic comes to a standstill and all drivers suffer. Even a small charge can cause a traveler to think twice about whether they need to drive, or if they could walk, cycle, take transit, or wait until after rush hour to travel, which can have a substantial impact on reducing congestion. Instituting a price for using certain lanes, driving into certain areas, parking in prime locations, or driving at peak times, can make scarce road resources available for those who have little option but to drive, and can generate resources to fund an array of other options for those who could use them.

In particular, some larger California cities have begun to discuss the possibility of seeking to improve traffic flow in key zones in their downtown by vastly increasing the alternatives for traveling to and from those areas, and funding those via a toll on automobiles entering or leaving the zone. Cordons have been successfully used in London and Stockholm in conjunction with efforts to provide an array of alternatives.⁸² These might include increased bus service, vanpools, bike- and scooter-share, as well as expanded sidewalks and cycling lanes. By keeping buses and drivers alike from having to sit in traffic, such an approach could make travel faster and easier for everyone. In California, legislation would be needed to allow local agencies to use this approach on their streets and roads.

Other pricing tools can also provide a financial incentive to support people who would like to travel in more sustainable ways, thereby also helping to reduce congestion for

⁸⁰ SB 1077 (de Saulnier, Chapter 835, Statutes of 2014).

⁸¹ CalSTA and Caltrans. 2017. *California Road Charge Pilot Program 2017 Final Report*. Retrieved from http://www.dot.ca.gov/road_charge/resources/final-report/docs/final.pdf.

⁸² For case studies on London and Stockholm's efforts, including their economic and health benefits, please see: San Francisco County Transportation Authority. December 2010. *San Francisco: Mobility, Access, and Pricing Study*. Retrieved from https://www.sfcta.org/sites/default/files/content/Planning/CongestionPricingFeasibilityStudy/PDFs/MAPS_study_final_lo_res.pdf.

those who need to drive. For example, reducing the cost of transit via transit passes provided or partially subsidized by property management companies, universities, and employers makes it cheaper for residents and employees to travel by bus or light rail. Cities and employers can institute parking charges in high-demand areas and/or provide lower cost or reserved parking spaces for carpools. Educating the public about the availability of per-mile car insurance pricing options can reduce costs on those who drive less. Finally, TNCs that utilize ridehailing services can continue or expand the use of surge pricing and lower costs for pooled service, and to encourage travel at times when the roads are less congested.

A key challenge is the need to structure any pricing efforts to avoid hurting low-income residents, many of whom work traditional shifts and are unable to telecommute or change their hours. Strategies can include low-income waiver programs, structuring any charges to fall at times and places when users are more likely to be moderate- and upper-income, and prioritizing low-income communities in the use of funds. The policies discussed in the “Growth and the Housing Crisis” section to ensure that affordable housing is built, and that low-income renters are protected, in locations convenient to transit and other transportation choices will also be important to avoid per-mile road charges from falling most heavily on them.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

"In the long-term, California cannot rely primarily on the gas tax to fund the maintenance and operations of our vital transportation system, which directly impacts the overall quality of life for Californians."

*- California Road Charge Pilot Program
Final Report*

While further progress on pricing strategies would require State action, many MPOs around the State have demonstrated success in testing new approaches for funding travel choices. Five regions report that they have already adopted or are beginning to consider pricing techniques, including some rural regions with heavy tourist traffic or heavy traffic passing through their region. Some leading practices, outlined further in Appendix C, include:

- Implementing congestion-based bridge tolls that vary the cost of the toll based on whether or not the driving occurs during peak commute hours.
- Creating networks of Express Lanes that are free to transit, carpools, vanpools, and motorcycles and that are available to single-occupant vehicles for a toll.

- Educating the public about the high costs of traffic congestion and the possibility of creating mobility zones via congestion pricing.
- Evaluating means-based pricing strategies for public transit.

OPPORTUNITIES AND NEXT STEPS

A variety of options exist for promoting alternative funding techniques, including:

- Building upon the findings identified in the Road Charge Pilot Program carried out by the California State Transportation Agency, the California Transportation Commission, and Caltrans. Next steps that were identified include further exploring technology and revenue-collection methods, as well as developing a phasing strategy and gathering public input.
- Authorizing design and implementation of further pilot projects that test the potential of alternatives to the gas tax for financing the transportation system (i.e., variable rate tolls, cordon tolling, distance charging) in conjunction with funding a suite of public transit, active transportation, carpooling, and other travel choices.
- Promoting the use of other strategies such as lower-cost transit passes, parking pricing, per-mile car insurance pricing options, and pricing structures for TNCs that encourage carpooling and traveling at lower-demand times.
- Identifying best practices for promoting benefits and minimizing negative impacts to low-income and disadvantaged communities of different pricing strategies. To the extent possible, seek community input and engage with communities in developing pricing strategies.

New Mobility

ISSUE: New technologies facilitated by the mobile revolution—such as car-sharing, bike-sharing, TNCs that utilize ridehailing services, and eventually fully-automated vehicles (AV)—offer the opportunity to transform our transportation system in ways that boost mobility and help meet State climate goals. But without additional State policy, they also risk increasing VMT and leaving low-income people behind.

OPPORTUNITY AREA: Convene a transportation system think tank to provide insight into the demands on the future transportation system and then identify the transformative technologies, solutions, partnerships, and critical steps to meet those demands, in a way that provides clear environmental benefits and fosters greater livability, access to destinations, and compact infill development rather than accelerating sprawl.

KEY CHALLENGES

The rise of new mobility solutions is rapidly transforming how people use transportation systems. Car-sharing, bike- and scooter-sharing, and TNCs that utilize ridehailing services may all play a critical role in a transition to a more low-carbon transportation system. They are already providing new options for some riders that need them and may also be slowing growth in auto ownership.

"The future has never been more uncertain, and we want to embrace that. We are funding experiments with microtransit, mobile apps, and more. Here in the "front yard" of the state capitol, we want to be a testbed and advance innovative pilot projects. We are ready to try new things, see what works and what fails, and grow the successful pilots into full-blown projects."

- James Corless

*Chief Executive Officer
Sacramento Area Council of Governments*

In particular, TNCs and other on-demand transportation providers offer great promise that is still largely untapped. Optimizing the linkages between ridesharing, ridehailing, and transit services could reduce VMT by offering better travel choices to those without cars or who do not drive, address first mile / last mile concerns for public transit, as well as helping to facilitate pooling.

However, TNC's and other on-demand transportation providers may also be putting former transit riders and cyclists back into automobiles and increasing

congestion on city streets. There is evidence that TNC trips are replacing walk and bike

trips to a lesser extent. One study found that 49 to 60 percent of TNC trips would have not been made or would have otherwise been made on foot, by bike, or by public transit.⁸³ Unfortunately, this may already be having an impact on VMT. Carefully crafted policy will be needed to ensure TNCs help, rather than undermine, state goals for climate, health, and environment, particularly in light of the coming arrival of automated vehicles, with which they could play a pivotal and helpful role.

Fully-automated vehicles may be the next step. While fully automated vehicles are not yet deployed in California, numerous interviewees emphasized the need for State and regional planning and policy work on this issue. If AVs are part of a shared fleet, sized appropriately, fueled via low-carbon electricity, used to facilitate pooling, and priced appropriately and in a manner that act to achieve the preceding objectives, they could simultaneously provide better access to destinations, and reduce driving and air pollution. However, academic research using various approaches are converging on the finding that, deployed without the appropriate policy framework ahead of their arrival, AVs are likely to significantly increase driving—particularly if they are personally owned.⁸⁴

California's four largest MPOs have launched a Future Mobility Research Program (FMRP) to collaboratively study the transportation and social equity impacts of innovative technologies, including ride-hailing, and to begin developing policy frameworks.⁸⁵ But because TNCs' data is proprietary and AVs have not yet been deployed, to begin educating policymakers on the potential impacts and about possible policy responses is difficult. Another central challenge is that many of the tools for managing travel patterns of these services are under local control or include multiple jurisdictions. Policy development will be needed at all levels of government, including local, regional, and state. For example, local governments can change curb-use regulations to encourage pickups in certain locations and discourage them in others.

⁸³ Clewlow, R. & Mishra, G. 2017. *Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States*. Institute of Transportation Studies, University of California, Davis, Research Report UCD-ITS-RR-17-07. Retrieved from https://itspubs.ucdavis.edu/wp-content/themes/ucdavis/pubs/download_pdf.php?id=2752.

⁸⁴ See: (1) Rodier, Caroline. April 2018. "Travel Effects and Associated Greenhouse Gas Emissions of Automated Vehicles." National Center for Sustainable Transportation; University of California, Davis, Institute of Transportation Studies. (2) Harb, M., Xiao, Y., Circella, G., Mokhtarian, P., & Walker, J. January 2018 (draft November 2017). *Projecting Travelers into a World of Self-Driving Vehicles: Estimating Travel Behavior Implications via a Naturalistic Experiment*. Presented at the Transportation Research Board 97th Annual Meeting (January 2018).

⁸⁵ See: MTC Planning Committee Memo dated 10/27/17. Retrieved from https://mtc.ca.gov/sites/default/files/5a_Future%20Mobility%20Research%20Program%20%E2%80%93%20Update.pdf.

MPOs and other transportation agencies can provide educational materials or grants or fund deployment of new approaches to public transit to assist with this work.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

Given the wide range of possible futures, early action to shape the market and development of these new technologies is important. Many of the largest regions are demonstrating leadership in implementing practices intended to help address new mobility issues, which are described in further detail in Appendix C. Efforts that some regions have adopted include:

- Funding pilot testing of new mobility strategies to support traditional public transit and transportation demand management strategies.
- Designing mobility hubs near transit and other key locations that bring together transit, active transportation, technology, car- and bike-share locations, and other first- and last-mile connections.

OPPORTUNITIES AND NEXT STEPS

CARB heard from a number of MPOs and other stakeholders that much more remains to be done, with the largest challenge being a lack of data and authority or jurisdiction over new service providers and land use allocation. As a next step on this topic, CARB should work together with the CPUC and other State, regional, and local agencies to advance research and policy-making in this area. A task force should be convened that can identify the demands of the future transportation system (e.g., further system electrification; new mobility options and technologies, such as ride-hailing and automated vehicles) and then outline the technologies, solutions, partnerships, and next steps for meeting those demands in a way that aligns with our greenhouse gas emissions reduction goals, provides clear environmental benefits, and fosters greater livability, access to destinations, and compact infill development rather than sprawl. Some efforts to build on include:

- SB 1014⁸⁶ directs CARB, the California Public Utilities Commission (CPUC) and the California Energy Commission (CEC) to foster the use of cleaner cars and more carpooling in ride-hailing trips and directs CARB to set goals for reducing the greenhouse gas emissions per passenger-mile traveled, including targets for the use of ZEVs.

⁸⁶ SB 1014 (Skinner, Chapter 369, Statutes of 2018).

- CARB also began work this year (2018) to assess possible regulatory approaches to ensure greater inclusion of ZEVs in public and private light- and heavy-duty vehicle fleets, including emerging new mobility services such as ridehailing fleets with emphasis on pooling and connections to transit.
- The State has also initiated a State Multi-agency Workgroup on Automated Vehicles to address deployment of connected and automated vehicles in California.

Data and Research Needs

ISSUE: Many gaps in data and research inhibit State, regional, and local agencies from monitoring their progress in advancing public health, equity, accessibility, and sustainability. Going forward, to address the State's goals more holistically, the State is going to need more and different types of data than what has historically been tracked.

OPPORTUNITY AREA: Develop a research and monitoring plan to fill data gaps and allow more comprehensive tracking of progress in each of the efforts identified in this report.

KEY CHALLENGES

This report set out to measure the strategies that are being utilized throughout California to advance health, equity, accessibility, and sustainability. Staff identified a number of gaps where the report would not be able to do so, due to limitations in the available data or the need for research to better define the issue and establish a monitoring method. These data gaps are outlined on pages 37, 48, and 55. They include important questions such as:

Transportation:

- Does current transportation spending match the investments outlined in long-term plans?
- Are investments that benefit health, equity, and sustainability being accelerated or deferred?
- Are investments benefiting under-served groups?
- Is auto-related pollution declining in overburdened communities?
- How much is active transportation infrastructure improving?
- How are TNCs impacting travel behavior?
- How are people traveling for non-work trips, such as for errands and recreation?

Housing:

- What is the jobs-housing fit: the balance between low-wage jobs and low-cost housing?
- To what degree is housing unaffordability increasing miles driven?
- How extensive is the displacement problem and what have its impacts been, and where are local jurisdictions working to address it? What local policies are most effective in minimizing displacement?

Efficient Land Use:

- Are homes and jobs being built near transit?
- Are daily needs near where people are living, and who is able to live in these convenient neighborhoods?
- Are jurisdictions' plans better addressing environmental justice (e.g., as a result of SB 1000)?

These are important questions to address. Identifying research, data collection, and data sharing methods to provide this information could greatly expand planning practice in California.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

This report focused on regions' efforts to create and implement their SCSs under SB 375, and did not survey MPOs about their techniques to expand data collection. However, Appendix C does include several highlights that can inform state efforts to address data gaps, such as different regions' efforts to:

- Creating web portals with up-to-date tracking metrics on key regional goals.
- Collecting data from local agencies through a local-input survey.
- Sharing data on vehicle miles driven directly with localities and making funds available to those local jurisdictions whose progress is falling behind.
- Leading multi-MPO efforts to assess equity impacts in a consistent way.

OPPORTUNITIES AND NEXT STEPS

A number of State agencies, including CARB, Caltrans, and SGC have funds that are available for research. These agencies could work together to develop a research and monitoring plan to fill data gaps and allow more comprehensive tracking of progress in each of the efforts identified in this report.

Limitations of SB 375

ISSUE: The current law connecting regional planning to State climate goals, SB 375, has greatly expanded the regional planning conversation. While amending SB 375 alone will not solve the challenges outlined in this report, doing so can strengthen and make greater use of efforts underway in this area.

OPPORTUNITY AREA: Develop recommendations to update SB 375 that better connect State goals with regional and local planning and implementation.

KEY CHALLENGES

Since its passage in 2008, SB 375 has led MPOs to expand the regional planning conversation beyond transportation. Regions must identify a forecasted growth pattern for the region after considering the best available information on resource areas and farmland and identifying areas sufficient to house the region's population, including people from every economic segment. Many regions have also estimated the health benefits of regional planning from reductions in chronic diseases such as asthma and heart disease due to addressing air pollution, promoting more active transportation, and more. As noted in the "Under-Served Communities" and "Growth and the Housing Crisis" sections above, some regions have also expanded their efforts to address transportation justice, housing affordability, environmental justice, and displacement.

However, as this report shows, many of the forecasted results have been slow to occur, and California is not on track to meet its SB 375 greenhouse gas emissions reduction targets for 2020. Many interviewees pointed out to CARB that current SB 375 law itself presents challenges to advancing better planning and local implementation. These included: (1) that the current law focuses on providing regional climate planning targets only, with no systematic mechanism for promoting other related and important co-benefits such as VMT reduction, health, equity, and conservation at the regional level; (2) the law does not adequately align State and regional planning horizons.

HOW ARE REGIONS WORKING TO ADDRESS THE CHALLENGE?

While regions do not have the power to expand or strengthen the SB 375 law, individual regions are demonstrating the power of regional planning to address important issues such as equity, regional planning, and conservation, as outlined in Appendix C:

- Identifying priority landscapes for conservation utilizing conservation data and by working with local agencies and conservation experts, and using that to shape the regional growth forecast, then utilizing sales tax or mitigation funds to conserve identified landscapes.
- Providing local tools for conserving key natural and working lands, such as providing information about farmland’s value to the local economy and hosting a transfer-of-development-rights marketplace.
- Analyzing the health, equity, and conservation impacts of SCS scenarios and setting targets for the plan’s projected performance across a range of goals.
- Providing planning and implementation funds to local agencies, placing a priority on projects that benefit areas with environmental justice communities and high health needs and that promote focused growth in existing communities rather than natural lands.

For more information on how regions are promoting equity and health equity, additional information is available in the “Under-Served Communities” section above.

OPPORTUNITIES AND NEXT STEPS

As work progresses to address the challenges in this report, the conversation should also include possible State action to strengthen SB 375. While amending SB 375 alone will not solve the challenges outlined in this report, doing so can strengthen and make greater use of efforts underway in this area. These improvements could start by:

- Identifying and aligning State targets for climate and transportation, health, equity, and conservation, including those from documents such as the Scoping Plan and the California Transportation Plan, to regional plans.
- Assessing and recommending changes to the law that better align State and regional planning horizon years.



By **Kendra Pierre-Louis**

Dec. 5, 2018

*Want climate news in your inbox? Sign up here for **Climate Fwd.**, our email newsletter.*

Greenhouse gas emissions worldwide are growing at an accelerating pace this year, researchers said Wednesday, putting the world on track to face some of the most severe consequences of global warming sooner than expected.

Scientists described the quickening rate of carbon dioxide emissions in stark terms, comparing it to a “speeding freight train” and laying part of the blame on an unexpected surge in the appetite for oil as people around the world not only buy more cars but also drive them farther than in the past — more than offsetting any gains from the spread of electric vehicles.

“We’ve seen oil use go up five years in a row,” said Rob Jackson, a professor of earth system science at Stanford and an author of one of two studies published Wednesday. “That’s really surprising.”

Worldwide, carbon emissions are expected to increase by 2.7 percent in 2018, according to the new research, which was published by the Global Carbon Project, a group of 100 scientists from more than 50 academic and research institutions and one of the few organizations to comprehensively examine global emissions numbers. Emissions rose 1.6 percent last year, the researchers said, ending a three-year plateau.

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In Reply Refer To:
FWS/CDFW-16B0244-17CPA0016

December 20, 2016
Sent by Email

Mr. Jeff O'Connor
HomeFed Corporation
1903 Wright Place, Suite 220
Carlsbad, California 92008

Ms. Melanie Kush
Director of Developmental Services
City of Santee
10601 Magnolia Avenue
Santee, California 92071

Subject: Proposed Fanita Ranch Project within the City of Santee Draft MSCP Subarea Plan,
City of Santee, San Diego County, California

Dear Mr. O'Connor and Ms. Kush:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department) have been working with the City of Santee (City) on development of the City's Multiple Species Conservation Program (MSCP) draft Subarea Plan, including review of HomeFed Corporation's (HomeFed) proposed Fanita Ranch project. Per a request from the City and HomeFed, we have reviewed the maps of the most recent proposed footprint for the project, which were provided by HomeFed in July 2016 (hard copy) and September 2016 (digital), along with relevant biological information previously provided or in our records. The maps included basic development features of the proposed Fanita Ranch project. In the interest of providing a timely response to HomeFed and the City, we reviewed only the limited suite of fundamental components of the proposed Fanita Ranch project that were available at this early stage of project and MSCP draft Subarea Plan development and design.

We analyzed the proposed development polygons for the Fanita Ranch project in view of regional and area-wide protection and management of natural wildlife diversity, proposed covered species, and overall reserve design to provide a preliminary assessment of whether the project would meet permit issuance criteria pursuant to section 10(a)(1)(B) of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*), and findings pursuant to the Natural Community Conservation Planning Act (NCCP Act) of 1991, as amended. We did not compare the current proposal with various former footprints proposed by previous owners of the property over the past 18 years.

Consistent with the issues we have raised at our meetings with the City and HomeFed over the past several months and in our letter of September 16, 2016, we continue to be concerned about the proposed Fanita Ranch project's development footprint and reserve design. These concerns are based on current ecological information and baseline resource conditions, including development within and adjacent to the City of Santee, the effects of past wildfires and future threats including edge effects and from proposed development and the potential effects associated with climate change, the status of proposed covered species and associated habitats, and the overall status of reserve assembly under the MSCP in southwestern San Diego County. As more specifically explained by the analyses provided in the Enclosure, our preliminary conclusion is that the proposed Fanita Ranch project will not meet the issuance criteria for a section 10(a)(1)(B) permit or support corresponding positive findings under the NCCP Act.

The proposed Fanita Ranch project would develop nearly 40 percent of the project site, and the proposed footprint would spread development across the project site landscape within multiple polygons. The project proposal would also have long connecting roads that would pass through and encircle intervening undeveloped reserve areas and require considerable extension of public facilities and services. The proposed road and development polygons would combine to fragment a large undeveloped and mostly intact open space area of high ecological integrity into a series of natural areas with new, high-level edge effects. Despite their absolute size, the resultant reserve areas would reduce the likelihood of maintaining sensitive species' numbers and viabilities, including the Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), western spadefoot toad (*Spea hammondi*), coastal cactus wren (*Campylorhynchus brunneicapillus*), and the San Diego golden star (*Bloomeria clevelandii*).

We suggest the proposed project footprint be reconsidered and modified with an improved reserve design. To that end, we have the following recommendations at this time for redesign of the proposed Fanita Ranch project:

1. The project should be redesigned to consolidate proposed development into a single polygon located largely in the southern portion of the site. This would reduce the amount of new development edge adjacent to remaining natural areas by eliminating "island" or "peninsula" types of development zones and fragmentation associated with infrastructure within surrounding natural areas.
2. The proposed reserve areas on site should be designed to be more contiguous across the property and with functional linkages to surrounding areas. Reserve areas should not be fragmented by roads or structure development.
3. A new modified reserve design should include a main reserve area with minimal new or existing edge effects.
4. Proposed project development should be sited closer to existing development in Santee in the southern portion of the site. This configuration would effectively provide for more inherent protection of new development from wildland fire (reducing concerns and conflicts

regarding natural fire in reserve areas) and much more effectively ensure/accommodate natural fire frequencies within remaining reserve areas.

5. The proposed project should provide improved conservation of habitats used by coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot toad, through increasing the acreages of respective habitats conserved that would not be subject to proposed construction or ongoing operational disturbance, modified natural fire cycles, edge effects, and/or fragmentation.
6. Proposed development and reserve areas should be fully buffered from each other using: fuel modification and stormwater detention zones with native landscaping, passive use areas such as strip parks with minimal irrigation, single-loaded roads, and peripheral trails. All buffer areas should be unlit; adjacent development/road areas should have minimized lighting that is directed and shielded away from buffer zones and natural areas.
7. Any roadways that would otherwise cross natural/reserve areas should be avoided or minimized to the maximum extent practicable. Such roads that cannot be avoided should be: a) as short and as narrow as possible (including any sidewalks) and without medians or curbs/gutters; b) consolidated with existing development by aligning them adjacent to developed areas where practicable (except as needed to avoid concentrations of sensitive species); c) designed for and requiring low maximum speed limits; d) unlit; e) landscaped only with native plants; f) designed to reduce wildlife roadkill, including appropriate fencing and native landscaping to direct wildlife movement to safe and functional ground corridors (as determined by the specific target/covered species) or to adequate heights above the roadway to avoid vehicle strikes (for birds and bats using tall native vegetation); and g) signed to raise awareness of wildlife corridors/crossings. Any recreational trails in the area should use some of these same wildlife corridor road crossings, such as bridges and large soft-bottomed culverts, to reduce the total extent of development infrastructure and increase corridor crossing function and size for wildlife.
8. The main east-west running riparian drainage through the project site should be fully conserved for ecosystem functions, including it as (at least) a wide, high-function east-west linkage for both covered species and typical target wildlife corridor species.
9. The project should be revised to minimize and mitigate impacts to listed species to the maximum extent practicable with a goal of no net loss of sensitive biological resources and their values, services, and functions resulting from proposed activities.
10. Vernal pools and their watersheds should be avoided to the maximum extent practicable. High-function vernal pools and their watershed should be avoided and conserved. Moderate function vernal pools on site should be restored or enhanced, as practicable.

We maintain that our previously suggested reserve/footprint designs for the Fanita Ranch project are consistent with the MSCP Subregional Planning goals and address the reserve design and species and habitat conservation needs identified above.

Our comments herein are directed by changes in conservation challenges and practices over the last decade, including accelerated loss of many habitats, effects of wildfire and climate change, and advances in conservation science. We continue to be available to work with representatives from HomeFed and the City on a revised project footprint for the Fanita Ranch project that would fully minimize and mitigate the loss of proposed covered species and habitats.

The literature cited in the Enclosure in support of our conclusions is available upon request. If you have any questions regarding this letter, please contact Carol Roberts of the Service at (760) 431-9440 or David Mayer of the Department at (858) 467-4234.

Sincerely,

Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Gail Sevens
Environmental Program Manager
California Department of Fish and Wildlife

Enclosure

cc:
James Whalen, J. Whalen Associates, Inc.

ENCLOSURE

Proposed Fanita Ranch Project Footprint

The proposed Fanita Ranch project footprint generally includes the following features: 1) a 2,666-acre site, including proposed road rights of way; 2) two large disjunct development polygons in the northern portion of the site; 3) two main access roads through existing habitat areas that would provide north-south connections between the two main development polygons; and 4) two access roads through existing habitat areas that would connect the more southerly development polygon to existing development and transportation corridors to the south. The proposed development polygons would include residential housing, a town center, a school site, a community farm and orchard, and neighborhood parks; the southern portion of the property would include the development of a special use area adjacent to the proposed regional park/trail system.

The proposed development would have a direct disturbance footprint of about 1,025 acres (about 904 acres permanent, 121 acres temporary), or 38 percent of the site. We estimate that the project as proposed would have an indirect effects footprint of roughly 592 acres within the site. This was calculated by applying a 150-meter “buffer” zone from the edge of proposed permanent development to proposed reserve areas on site that are not currently within 150 meters of existing development. Combined, this would make the direct and indirect footprint of permanent effects total about 1,496 acres (about 56 percent) of the project site.

Proposed reserve areas on site that would remain essentially undisturbed directly by development, outside of proposed trails, would consist of about 1,641 acres, or about 62 percent of the site. About 338 acres of this proposed reserve area is currently subject to indirect edge effects from existing development occurring within 150 meters of the property boundary. As noted above, 592 acres of this reserve area would be subject to new indirect edge effects from proposed development. Combined, about 930 acres (57 percent) of the 1,641-acre proposed reserve area would be subject to indirect edge effects.

The proposed reserve areas would consist of one relatively large polygon in the southwestern portion of the site and a series of remaining undeveloped areas of the site encircling the proposed development polygons. The proposed main reserve area would end up mostly surrounded by existing (to the south, east, and west) and proposed project (to the north) development, and would be fully encircled by roads/development. The proposed main reserve area polygon in the south would also include a regional park and a trail system, the specifics of which were not provided in the project footprint.

MSCP, ESA, and NCCP

In order for Santee’s proposed Subarea Plan to integrate with the MSCP, the plan and the projects within it must meet the issuance criteria under section 10(a)(2)(B) of the ESA and the findings under the NCCP Act, and the Subarea Plan must be consistent with, and fulfill the requirements for, Subarea plans under the MSCP. The required criteria under section 10(a) are: 1) the taking will be incidental; 2) the Applicant(s) will, to the maximum extent practicable,

minimize and mitigate the impacts of the taking of covered species; 3) the Applicant(s) will ensure that adequate funding for the plan and procedures to deal with unforeseen circumstances will be provided; 4) the taking will not appreciably reduce the likelihood of survival and recovery for species in the wild; 5) other measures, as required by the Director of the Service, as necessary or appropriate for purposes of the plan will be met; and 6) the Director has received such other assurances as he or she may require that the plan will be implemented.

Per the NCCP Act, a Natural Community Conservation Plan (NCCP) must identify and provide for the regional or area-wide protection and management of natural wildlife diversity while allowing for compatible and appropriate development and growth. A NCCP is intended to provide comprehensive management and conservation of multiple species, including but not limited to, species listed under the California Endangered Species Act (CESA) or Federal ESA.

Reserve Design

Habitat loss is a leading cause of decline for many species worldwide, particularly in highly urbanized areas such as the coastal slope of southern California (Delaney *et al.* 2010). Urbanization in southern California over the last several decades has resulted in loss of large areas of native ecosystems, particularly in coastal regions. The coastal sage scrub natural community has been reduced to as little as 10 percent of its former extent by conversion to human uses and now supports around 100 animal and plant species considered by the Wildlife Agencies to be sensitive (Atwood 1993; McCaull 1994; Dobson *et al.* 1997; Rundel 2007). The reserve design component of projects, such as the proposed Fanita Ranch project, is key to minimizing the local and regional effects of habitat loss.

Reserve design is the process of planning an ecological reserve in a way that effectively accomplishes the goals of the reserve (Possingham *et al.* 2000). Almost all nature reserves have a primary goal of protecting biodiversity from harmful activities and processes, both natural and anthropogenic (Noss 1994). To achieve this, reserves must extensively sample biodiversity at all taxonomic levels and enhance and ensure long-term survival of the organisms (Margules and Pressey 2000).

When evaluating the currently proposed Fanita Ranch project, we must consider the NCCP Conservation Guidelines, November 1993. Following these Guidelines is imperative to the successful incorporation of the Fanita Ranch Subunit into the Santee Subarea Plan because of the Fanita Ranch site's undeveloped condition, overall configuration and size, and its geographic location and in recognizing that it is the largest undeveloped area (with the largest area of chaparral and coastal sage scrub) remaining in the Subarea. Several basic tenets of reserve design are central to the Guidelines, including:

1. Conserve target species throughout the planning area (species that are well-distributed across their native ranges are less susceptible to extinction than are species confined to small portions of their ranges);
2. Larger reserves are better (large habitat blocks containing large populations of the target species are superior to small habitat blocks containing small populations);

3. Keep reserve areas close (blocks of habitat that are close to one another are better than habitat blocks far apart);
4. Keep habitats contiguous (habitats that occur in less fragmented, contiguous blocks are preferable to habitats fragmented or isolated by urban lands);
5. Link reserves with corridors (interconnected habitat blocks serve conservation purposes better than do isolated blocks, and corridors or linkages function better when the habitats within them resemble habitats that are preferred by target species);
6. Reserves should be diverse (blocks of habitats should contain a diverse representation of physical and environmental conditions); and
7. Protect reserves from encroachment (habitat blocks that are roadless or otherwise inaccessible to human disturbance serve to better conserve target species than do accessible habitat blocks).

Our preliminary evaluation (based on general principles and the needs of a subset of the proposed covered species) is that the current Fanita Ranch project proposal is not consistent with NCCP Conservation Guidelines for the following reasons: 1) the proposed project footprint and associated reserve areas fail to conserve sufficiently large habitat areas for several of the proposed covered species including the Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), western spadefoot toad, (*Spea hammondi*), coastal cactus wren (*Campylorhynchus brunneicapillus*), and San Diego goldenstar (*Bloomeria clevelandii*); 2) it does not provide reserve areas that are functionally contiguous so as to allow for unobstructed species movement and recolonization for the proposed covered species; 3) it does not provide reserve areas that are free from substantial edge effects and fragmentation for these species; and 4) it does not ensure reserves are protected from future encroachment that could disturb covered species and/or degrade their habitats.

Further, the increase in the number of housing units within the proposed Fanita Ranch development from the number of units contemplated/analyzed in the City of Santee General Plan (City of Santee 2003) would likely lead to an additional increase in human-caused disturbances from unauthorized uses in the proposed reserve areas, such as off-trail use, trespass, and the presence of uncontrolled domestic pets. The current general plan guidelines would permit the development of around 1,300 residential units on the Fanita Ranch project site (City of Santee 2003). The Fanita Ranch project would include on the order of 3,000 residential units according to our discussions with the City of Santee and HomeFed.

We also reviewed the proposed Fanita Ranch project footprint in view of the MSCP's Biological Preserve Design Checklist (Section 3.6 of the MSCP). The checklist incorporates these basic tenets of reserve design:

1. General Preserve Design: a) High biodiversity lands as indicated by spatially representative examples of extensive patches of sensitive vegetation communities ranked as Very High and High biological value by the MSCP habitat evaluation map

(Figure 2-3 of the MSCP) or as identified through subsequent fieldwork; b) Large blocks of unfragmented habitat, following natural topography (ridges and watersheds); c) Large, interconnected blocks of habitat that contribute to the preservation of wide-ranging species; d) Key existing linkage areas between core habitat blocks, with connections to other private or public open space lands and to other subareas and/or habitat patches outside the subarea restored or enhanced as necessary; and e) Configuration that minimizes edge effects between habitat preserves and development and the edge-to-preserve area ratio.

2. Habitat Criteria: a) Total acreages and vegetation communities equivalent in conservation value to those conservation targets listed in the MSCP Plan (Tables 3-1 and 3-2 of the MSCP); b) Representation of sensitive vegetation communities and their geographic subassociations containing priority species in large, functioning ecosystems; c) High-quality vernal pools (primarily but not exclusively supporting sensitive species) and no net loss of wetland habitats per state and federal policies and regulations; and d) High habitat quality including microhabitats (e.g., soil type, host plant, drainages, rock outcrops) important to sustain long-term viable populations of individual covered species as identified in the MSCP habitat evaluations map (Figure 2-3 of the MSCP) and subsequent fieldwork.
3. Species Criteria: a) Core coastal California gnatcatcher and coastal cactus wren populations and key linkage areas between them as identified in Figure 2-2 of the MSCP or through subsequent fieldwork; b) Federal and State endangered and threatened species and species proposed for listing; and c) Key regional populations of proposed covered species within the subarea, as coverage for the entire MSCP study area is dependent on the retention and maintenance of adequate populations of these species and their habitat within the subarea.
4. Management and Biological Monitoring Criteria: a) Appropriate management within the preserve to minimize edge effects from adjacent land uses; b) Appropriate uses within the preserve that are compatible with and complement the biological function of the area; and c) Biological monitoring of habitat and species should reflect priorities as determined in categories 2 and 3 above.

Our evaluation of the proposed Fanita Ranch project is that it is inconsistent with the MSCP's Biological Preserve Design Checklist, as follows:

1. General Preserve Design: The existing large blocks of habitats on the site that contribute to the preservation of important/indicator wide-ranging species (such as golden eagle, mountain lion, and bobcat) would be fragmented by the project; boundaries of the project reserve areas, as currently designed, would not follow natural topographic features, which would be expected to exacerbate edge effects; key existing linkage areas between core habitat blocks on the site (for species such as coastal cactus wren, Hermes copper butterfly, and Quino checkerspot butterfly) would not be maintained given the configuration of the proposed project; functional connections to other private and public open space lands within/outside the Subarea would be reduced

or lost with the current configuration, potentially reducing the ability for species to recolonize the area; and the project as currently designed would have a high edge-to-preserve area ratio because it does not minimize the edges of the proposed development that are in contact with the habitat preserve areas.

2. **Habitat Criteria:** The proposed project reserve areas would consist of representative sensitive vegetation communities containing priority species, but the configuration would not result in conservation of large, functioning ecosystems (as currently exist or have the potential to exist on the site); the project would result in net loss of vernal pool wetland habitat functions and values; and due to reserve design and resultant edge effects, the project as proposed would not conserve high quality habitats and microhabitats (e.g., host plants, drainages, rock outcrops) important to sustain viable populations of some covered species, such as coastal cactus wren, Quino checkerspot butterfly, and Hermes copper butterfly, in the long term.
3. **Species Criteria:** Coastal cactus wren, Quino checkerspot butterfly, and Hermes copper butterfly occurrences, habitats and linkage areas across the project site and broader MSCP area would not be functionally conserved by the project.

Edge Effects and Fragmentation

Habitat fragmentation and edge effects are among the principal threats to persistence of biological diversity (Soulé 1991). Harrison and Bruna (1999) did a review of a suite of studies dealing with fragmentation and edge effects and concluded that there is a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly in regards to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher *et al.* (2007) found that distance from edge had a stronger effect on species than habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; i.e., their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé *et al.* 1992; Bolger *et al.* 1997a,b; Suarez *et al.* 1998; Burke and Nol 2000; Henle *et al.* 2004). The development/reserve design proposal for Fanita Ranch, if implemented, would have very high levels of development to reserve edge boundary, in part due to the unconsolidated/multiple development and road polygons proposed and their resultant large perimeter to area ratios.

Edges are often defined ecologically as places where: natural communities meet, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries *et al.* 2004). Edge effects are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk *et al.* 1997) and/or changes in biotic factors such as predator communities, density of "edge species," and food availability (Soulé *et al.* 1988; Matlack 1994; Murcia 1995; Ries *et al.* 2004).

Urbanization is typically comprised of residential, commercial, industrial, and road-related development; urbanization is the “built” environment. At the perimeter, or edge, of the built environment is an area known as the urban/wildland interface. When development is configured in a manner that creates a high ratio of development edge to wildland, an increase in the potential impacts caused by human use occurs. Land managers and planners have for decades relied on island biogeographic theory (see Reserve Design above) to plan for large natural open space reserves with connections to other reserves in order to preserve biodiversity (MacArthur and Wilson 1967; Quammen 1996). However, it has recently become clear that relatively large connected reserves are often not enough. Because of adverse effects to these wildlands from adjacent developed areas, it has become evident that, in order to maintain viable ecosystems and biodiversity, enhanced attention must be given to minimizing indirect impacts to wildlands from adjacent urban areas.

Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Donovan 1997; Sisk *et al.* 1997; Ries *et al.* 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than more “intermediate” or “interior” areas, presumably due to increased human activity/disturbance of the vegetation structure near edges (Kristan *et al.* 2003). Increases in vegetative litter often facilitate non-native plant (particularly grass) growth, resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich *et al.* 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters of an urban edge, and the abundance of the disturbance-tolerant species is elevated up to 1000 meters from an urban edge, depending on the species (Bolger *et al.* 1997a).

A few of these specific indirect edge impacts are as follows:

1. Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands;
2. Higher frequency and/or severity of fire as compared to natural fire cycles or intensities;
3. Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife;
4. Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise;
5. Introduction of or increased use by exotic animals which compete with or prey on native animals; and
6. Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts individually or in combination can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance *et al.* 2007). Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses (e.g., see Bolger 2000; Kristan *et al.* 2003; Drolet *et al.* 2016). Losses of coastal sage scrub in southern California have resulted in the increased isolation of the remaining habitat fragments (O'Leary 1990).

Fragmentation has a greater relative negative impact on specialist species (e.g., the coastal cactus wren) that have strict vegetation structure and area habitat requirements (Soulé *et al.* 1992). Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Alberts *et al.* 1993), scrub-breeding birds (Soulé *et al.* 1988; Crooks *et al.* 2001), native rodents (Bolger *et al.* 1997b), and invertebrates (Suarez *et al.* 1998; Bolger *et al.* 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002). The increased presence of human-tolerant "mesopredators" in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance [of species such as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*)] increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub natural community fragments seem tolerant of disturbance, these fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela*

frenata), and badgers (*Taxidea taxus*) (Crooks 2002). Most “interior” sites within such fragments are still relatively near (less than 250 meters) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, native bee (Hung *et al.* 2015) and native rodent (Bolger *et al.* 1997b) species diversity is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and McGuire 2011), with the fragmentation of the coastal sage scrub ecosystem as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal cactus wren populations in southern California (Barr *et al.* 2015). Both sage sparrows (*Artemisiospiza nevadensis*) and California thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub [i.e., they are edge-averse (Kristan *et al.* 2003)], and California thrashers and California quail were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger *et al.* 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the coastal cactus wren and likely the coastal California gnatcatcher and San Diego pocket mouse, are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan *et al.* 2003). Bolger (*et al.* 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine ants (*Linepithema humile*) serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine ants (Bolger 2007). The extent of Argentine ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Hollway and Suarez 2006). Native ant species were more abundant away from edges and in areas with predominately native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine ant-free refugia had more native ant species than those without refugia (Suarez *et al.* 1998). They displace nearly all surface-foraging native ant species (Hollway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez *et al.* 1998; Hollway 2004; Fisher *et al.* 2002; Bolger 2007). Argentine ants are widespread in fragmented coastal scrub habitats in southern California, and much of the remaining potential habitat for coastal horned lizards (*Phrynosoma coronatum*) is effectively unsuitable due to the penetration of Argentine ants and the subsequent displacement of the native ant species coastal horned lizards need as prey (Fisher *et al.* 2002).

Similarly, the invasion of Argentine ants into coastal sage scrub has also shown a strong negative effect on the abundance of the gray shrew [*Notiosorex crawfordi* (Laakkonen *et al.* 2002)].

Although the direct effects of habitat loss to urbanization are fairly obvious and typically irreversible, the indirect effects of urbanization on adjacent remaining habitats can be more subtle to detect. While very intensive reserve management activities such as invasive plant and animal removal and repeated/continuous restoration/enhancement of the native vegetation can partially reduce some edge effects, these activities are often quite difficult and expensive and would have their own repeated impacts, making them impracticable on a large scale.

The proposed Fanita Ranch project's development design would result in substantial fragmentation of the existing habitats and natural communities on and around the property. The substantial edges and related effects associated with the current proposal would extend the zone of impacts from new development deeply into the reserve areas that would remain. While these edge effects would not strictly eliminate all potential covered species use and ecosystem function in the identified edge effect zone we have evaluated herein (i.e., reserve areas 150 meters from urban edge), these effects would very likely greatly reduce the utility of these reserve areas for the covered species. In addition, much of the area proposed as reserve is currently subject to edge effects from existing development.

Fire and Nitrogen Deposition

Fire affects animal species composition (at least temporarily) in California grassland and shrub communities by shifting vegetation structure and composition (Clark *et al.* 2008). The increase in urbanization of the project region is expected to lead to a subsequent increase in the ignition rate of wildfires (Keeley and Fotheringham 2001). Research in southern California suggests that the frequency and intervals of fire in coastal sage scrub and chaparral are likely more important than fire severity and size, largely because of the potential to convert native vegetation from shrubs to grass communities dominated by non-natives (Diffendorfer 2008).

Increasingly, it has become evident that fire-prone ecosystems of southern California can be highly vulnerable both to exotic plant invasion during the immediate post-fire period and to alterations of fire regime by altered fuel bed properties after invasion (Keeley *et al.* 2010). This is important, as vegetation is a key driver of wildlife diversity. When native shrublands are invaded by exotic grasses, many changes take place: rooting depths, canopy cover, habitat and ecosystem functions, species heterogeneity, water use, and fire regimes are radically altered (Wilcox *et al.* 2011).

Invasions resulting in the type transformation of one vegetation community to another are an increasingly widespread problem in coastal southern California shrub and grassland systems (Talluto and Suding 2008). While it is clear that these conversions, particularly between grassland and shrubland systems, have severe ecological consequences (Minnich 2008), it has only recently become relatively clear which factors are primarily associated with these conversions (e.g., see Talluto and Suding 2008; Flemming *et al.* 2009; Fenn *et al.* 2010; Keeley and Brennan 2012).

Anthropogenic sources of fixed nitrogen (N) are also having unintended consequences in ecosystems across the globe. Nitrogen inputs in the United States from human activity doubled between 1961 and 1997, mainly from inorganic N fertilizer use and emissions from burning fossil fuels (Howarth *et al.* 2002; Clark *et al.* 2013). Since the 1930s, coastal sage scrub cover in remaining extant areas has declined by about 49 percent, being replaced predominantly by exotic grassland species (Talluto and Suding 2008). Exotic grassland encroachment in coastal sage scrub is positively correlated with increased fire frequency and/or air pollution (measured as percent fossil carbon, which is likely correlated with nitrogen deposition), depending on location (Talluto and Suding 2008; Fenn *et al.* 2010; Cox *et al.* 2014). It is now understood that increases in fire frequency and nitrogen deposition combined over the last several decades have likely facilitated the conversion of coastal sage scrublands to exotic grasslands in southern California in many areas (Egerton-Warburton *et al.* 2002; Talluto and Suding 2008; Cox *et al.* 2014). It is also likely that the changes in climate that the San Diego region is experiencing will increase the frequency and intensity of fires in the future, making the region more vulnerable to large intense wildfires such as the ones that occurred in the project area in 2003 and 2007 (Messner *et al.* 2016).

Climate Change

Climate change is defined as any significant change in climate metrics, including temperature, precipitation, and wind patterns, over a period of time (NASA 2011). Climate change may result from natural or human activities that change atmospheric composition (IPCC 2007). There is now broad scientific consensus that humans are changing the chemical composition of the earth's atmosphere (IPCC 2013). Activities such as fossil-fuel combustion, deforestation, and other changes in land use are resulting in the accumulation of greenhouse gases (GHGs) such as carbon dioxide (CO₂) in the atmosphere (IPCC 2013). Substantial increases in GHG emissions likely result in an increase in the earth's average surface temperature, commonly referred to as global warming (Lockwood 2009; IPCC 2013, NASA 2016). Global warming is expected, in turn, to affect weather patterns, average sea level, chemical reaction rates, precipitation rates, and other climatic conditions; such changes, taken collectively, are commonly referred to as climate change (Melillo *et al.* 2014; EPA 2016). Human-caused climate change is now thought to have likely begun in the late 19th century coinciding with industrialization; the earth's climate is now changing rapidly, affecting species and natural communities (MEA 2003; Li *et al.* 2016). Observed rapid vertebrate wildlife declines over the last century are likely linked to climate change (Li *et al.* 2016). Climate change is likely having adverse effects on the ecosystems that many of southern California's sensitive species depend upon, and it is important to address in the context of regional plans (Messner *et al.* 2009).

The western United States has warmed at a faster rate compared to the national average (Moser *et al.* 2009). Over the twentieth century, California has experienced an increase in this average of roughly 0.8°C (1.5°F), with some variability in the rate of warming within the state. The warming trends are asymmetrical, with nighttime minimum temperatures rising faster than daytime maximum temperatures, and winter/spring seasonal temperatures experiencing greater warming compared to summer/fall (Nemani *et al.* 2010; Gershunov *et al.* 2009).

The United States government did not officially acknowledge that global climate change was a significant issue until 2008 (National Science and Technology Council 2008), resulting in a lack of emphasis on climate change in federally regulated conservation planning before 2008. Natural communities, species, and their habitats are vulnerable to climate change based on their ecology and natural history. While temperature rise in itself will have direct consequences on species viability and natural community distribution and composition, the effects of climate change on the amount and timing of precipitation and the frequency of severe weather and related disturbance events are also likely to affect natural communities and the proposed covered species in southern California. California saw 2015 as the warmest year on record (USGS 2016). Climate is a major driver of species distributions, and rising temperatures over the last 100 years have already resulted in significant shifts in species ranges worldwide (Parmesan 2006). One consequence of climate disturbance in California is a shift of many species to the north and to higher elevations (Loarie *et al.* 2008). Most southern California scrub and chaparral native plant species models show potential northern habitat expansion and southern habitat contraction due to projected climate change, assuming the potential for dispersal (Riordan and Rundel 2014).

Native plant and animal dispersal would, without barriers, likely play an important role moderating losses from both climate change and land use; however, land use currently restricts dispersal of many species in coastal southern California (Riordan and Rundel 2014). High geographic overlap in habitat losses driven by projected climate change and existing and projected land use on the coastal slope of southern California underscores the potential for compounding negative impacts of both drivers (Riordan *et al.* 2015). Limiting habitat conversion and maintaining ecosystem linkages is likely a broadly beneficial strategy under climate change (Collingham and Huntley 2000; Riordan and Rundel 2014).

Addressing projected land use as part of climate change assessments is particularly important for coastal southern California, where multiple drivers of environmental change are projected to cause some of the highest proportional biodiversity losses worldwide by the year 2100, chief among which is land use (Sala *et al.* 2000; Conlisk *et al.* 2013; Riordan and Rundel 2014). We emphasize the importance of maintaining linkages for dispersal in moderating future habitat loss for vulnerable species and addressing comprehensively the drivers of climate change, habitat loss, fire, nitrogen deposition, and land use in conservation and resource management planning.

Preliminary Consistency Determinations and Findings on Proposed Covered Species

In the interest of providing a timely response to the City of Santee and HomeFed, the Service and Department's preliminary consistency determinations and findings for the proposed Fanita Ranch project herein focus on a subset of the proposed 22 covered species being considered by the City of Santee as discussed below. While we performed a basic review of all the proposed covered species for the proposed Fanita Ranch project, a more detailed analysis was prepared for the following species based on the most important concerns that were apparent: Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), western spadefoot toad (*Spea hammondi*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and the San Diego golden star (*Bloomeria clevelandii*).

Quino Checkerspot Butterfly:

Status: The Quino checkerspot butterfly (Quino) was listed as federally endangered in 1997. It was historically distributed throughout the coastal slope of southern California including Los Angeles, Orange, western Riverside, San Diego, and southwestern San Bernardino counties and also northern Baja California, Mexico (Mattoni *et al.* 1997). Quino occurs in coastal sage scrub vegetation, and it was once one of the most abundant species of butterflies in southern California but is now very rare. By the mid-1980s, Quino was thought to have fully disappeared, and a petition to list the species in 1988 suggested that it might be extinct (Service 1997). However, “new” populations were subsequently discovered in Riverside County, the butterfly was rediscovered in San Diego County, and it continued to survive in northern Baja California, Mexico (Parmesan 1996). As an important indicator of existing threats, Quino has likely been extirpated from Los Angeles, Orange, and San Bernardino counties (Service 2003).

Threats and Conservation Needs: More than 75 percent of the habitat in Quino’s former range has been converted to agriculture or urban development (Service 1997). In addition, Quino is threatened by non-native plant species, increased fire frequency, increased nitrogen deposition, drought, fire management practices, climate change, off-road vehicle use, and grazing (Service 1997; Service 2009; Anderson *et al.* 2014). Conversion from native vegetation to non-native annual grassland is the greatest threat to habitat on legally-protected lands, and a high magnitude threat to all extant habitat that is not managed (Service 2009). Increased dominance of non-native plant species reduces the abundance (by competition) and suitability (by shading) of host plants upon which Quino depends (Service 2003; Service 2009).

Butterflies are especially sensitive to environmental change, and extinction rates for these species are accelerating (Forister *et al.* 2010; Potts *et al.* 2010; Warren and Bourn 2010). Quino is likely increasingly vulnerable to prolonged and intense droughts predicted by climate change models, particularly when synergized with other threats (Parmesan 1996; Preston *et al.* 2012; Anderson *et al.* 2014). Other threats include direct mortality from vehicle collisions along roads and human use of extant habitat areas causing trampling of larvae and host plants and compaction of soils [San Diego Management and Monitoring Program (SDMMP) 2013]. Essentially, any activity that appreciably fragments Quino habitat or removes or excludes host or nectar plants increases the probability of extirpation/extinction of Quino (Service 2003; Fenn *et al.* 2003). In addition, the wildfires that burned much of the natural vegetation of San Diego County during 2003 and 2007 burned many areas of Quino habitat. It is unclear what the long-term impacts of these fires will be on the Quino populations. We have recently determined that Quino’s decline as well as its shifting distribution is a complex multi-scale process related to agricultural history, urban development, climate variability, and wildflower host and nectar source declines (Preston *et al.* 2012). Observed northward range shifts by Quino are largely blocked by urbanization, and range shifts to higher elevations may require additional shifts in host plant by the species (Parmesan *et al.* 2015). Projections indicate that much of Quino’s current range in the USA is becoming uninhabitable (Parmesan 2015).

Metapopulation: A metapopulation is composed of a number of local populations; to remain viable, individuals interact among local populations within a larger metapopulation enough to effectively reduce the extinction probability of the metapopulation as compared to the extinction

probability of any local population (Service 2009). The distribution of Quino is patchy at several geographic scales; habitats are patchily distributed and naturally form networks of connected habitat patches, which are variably occupied over time. Most Quino populations display this metapopulation structure, and it is essential to conserve temporarily unoccupied patches of habitat for metapopulation resilience (Service 2009).

Host plant availability affects butterfly diet, which in turn affects habitat colonization rates and local population persistence; important aspects of Quino metapopulation dynamics are likely emergent properties (i.e., resulting from the complex interplay of factors) affected by this and other host plant and butterfly characteristics (Service 2003). Interaction of Quino populations specifically refers to emigrants re-colonizing neighboring habitat patches where the local population has been extirpated, not just occasional exchanges of individuals and thus genetic material. Long-term persistence of species with metapopulation dynamics likely depends on maintenance of geographically intermediate habitat patches and rare long-distance dispersal events that link local populations across the larger metapopulation (Service 2003).

Quino metapopulations experience marked fluctuations in density and geographic distribution on a scale of about 5 to 10 years (Service 2003). The survival and recovery of the Quino depends on landscape-level protection, restoration, and management of metapopulations and ecosystems associated with the distribution of those metapopulations, including conservation of temporarily unoccupied habitats. Success will require the augmentation of extant populations, and the reestablishment of one or more populations in the coastal portion of its former range (Service 2003; Service 2009).

The long-term survival strategy for Quino includes protecting and managing remaining population distributions in habitat configurations designed to support resilient metapopulations (Service 2003). Using metapopulation theory, regional reserves must be designed to provide sufficient numbers of habitat patches such that: 1) only a small number of habitat patches will likely be extirpated in a single year; and 2) patches are close enough such that natural recolonization can occur at a rate sufficient to maintain a relatively constant number of patches supporting larval development (Service 2003).

Drought: The Quino checkerspot butterfly has likely undergone a limited increase in abundance and distribution following its extreme reduction before and during the prolonged 1980's drought. However, current species abundance and distribution remain far below the pre-drought 1970's levels, and there is no evidence that the long-term decline due to human impacts has slowed (Service 2003). California is currently entering a sixth year of drought (USGS 2016). A zone of "extreme drought" has persisted in the current range of Quino since 2014 (NASA 2016). During this current drought period the species has again likely declined based on rangewide survey data. Quino checkerspot could be increasingly vulnerable to prolonged and intense droughts predicted by climate change models (Parmesan 1996; Preston *et al.* 2012).

Fragmentation and Edge Effects: Habitat fragmentation establishes barriers to important dispersal and colonization processes when intervening habitat is degraded and unusable to Quino individuals. Fragmentation-induced isolation of populations greatly reduces the likelihood that immigrants from other populations will re-colonize adjacent, extirpated populations (Bleich *et al.*

1990). Habitat fragmentation also changes the environment and ecological functions at the fragment edge.

As noted elsewhere herein, important edge effects include increased frequency of fire and changes in light, temperature, wind, and humidity (Schelhas and Greenberg 1996; Laurance and Bierregaard 1997). Habitat fragmentation, and the associated increase in edge-to-area ratios, also increases the vulnerability of fragments to invasion by exotic species and ultimately to vegetation type conversion. Development edges typically provide high-energy, high-nutrient, disturbed environments where exotic species increase in numbers and then disperse or invade various distances from the edge into habitat areas (Janzen 1983; Paton 1994). Other causes (some synergistic) of vegetation type conversion include fire, off-road vehicle activity, and increased nitrogen deposition (Service 2009).

Nitrogen Deposition: Quino's host plant, dots-eed plantain (*Plantago erecta*), was at one time abundant in the open interspaces that commonly existed among coastal sage scrub shrubs, but these sites are increasingly now occupied by exotic grasses (Fenn *et al.* 2003). Biological response studies in western North America demonstrate that some natural communities are significantly altered by N deposition, including increases in exotic grass invasion in coastal sage scrub (Fenn *et al.* 2003). Quino has become locally extirpated in the southern edge of its range by a combination of N deposition, drought, and exotic grass invasion (Service 2002; Fenn *et al.* 2003). The continued existence of this butterfly is problematic considering these exotic grass invasions and the concomitant decline of the *P. erecta* host plants; this problem could potentially be solved by restoration efforts, but this restoration would likely be an expensive and continual process in the face of continued artificially high N deposition and other anthropogenic influences that promote exotic grass invasion and productivity (Service 2002; Fenn *et al.* 2003). Chronic N deposition in parts of southern California is also implicated in increased fire frequency (Fenn *et al.* 2003).

Climate Change: Climate change is an environmental factor that is likely influencing the current and future condition of many of the proposed covered species such as Quino, including their reproduction, numbers, and distribution. Worldwide, climate change may cause future large-scale extinctions and interact with other drivers to accelerate extinction and biodiversity loss (Purvis *et al.* 2000; Brook *et al.* 2008; Wiens 2016). Insects are especially vulnerable to climate change as ambient temperature controls body temperature that influences metabolic reaction rates and life history phenology (Parmesan 2006; Memmott *et al.* 2007; Wilson and Maclean 2011). Climatic data and predictions indicate that almost all California state climate divisions show a substantial increase in predicted mean daily temperatures and a considerable predicted decrease in mean precipitation for the 21st century (Karl *et al.* 1996; IPCC 2014).

Increasing climate variability can lead to phenological mismatches between butterflies and their host plants, affecting reproductive success and potentially causing population extinctions (Parmesan 2006; Hegland *et al.* 2009; Singer and Parmesan 2010). In addition, differential shifts in space between butterflies and their host plants, as a result of climate change imposed on narrow habitat requirements may lead to reductions in overall range, population distributions, and abundance of the butterflies. Quino is vulnerable to these effects, although one shift of host

plants with the elevational shift has been observed, with Quino shifting to Chinese houses (*Collinsia* sp.) as its host plant at higher elevations in some areas (Parmesan 2015).

Many population extinctions of Edith's Checkerspot butterfly (*Euphydryas editha*) have been associated with particular climatic events (Singer and Thomas 1996; Ehrlich *et al.* 1980; Singer and Ehrlich 1979). The 1975-77 severe drought throughout California caused the extinction of 5 out of 21 surveyed populations (Ehrlich *et al.* 1980; Singer and Ehrlich 1979). Extremely wet years caused opposite responses in two subspecies: following winters with 50–150 percent more precipitation than the average, Bay checkerspot butterfly (*E. editha bayensis*) suffered population crashes in the vicinity of San Francisco Bay (Dobkin *et al.* 1987), while Quino exhibited population booms in northern Baja, Mexico (Murphy and White 1984). The observed northward and upward range shift of *E. editha* during the 20th century has occurred as a result of increased numbers of population extinctions at the southern range boundary and at lower elevations, with a symmetrical tendency toward population stability along the northern range boundary and at the highest elevations (Parmesan 1996). Thus, infrequent and severe climatic events, via short-term responses at the population level, appear to have driven a gradual range shift in this species.

Proposed Project: Surveys were conducted on the Fanita Ranch site by Dudek in 2004, 2005, and 2016. The species was detected on the project site in 2005. Although Quino was not detected on the project site in 2016, the drought conditions over the past few years have created unfavorable conditions for Quino and negatively affected Quino populations in San Diego County. Based on survey data from throughout San Diego County, conditions in 2016 for Quino were once again below average. We expect that Quino are in low numbers on site or the site is currently temporarily unoccupied.

The proposed Fanita Ranch footprint would directly and indirectly impact most of the remaining habitat for Quino (mapped by host plant occurrences) within the project site, including fragmenting what would be the largest remaining habitat patch within the project site. The largest area of extant mapped Quino habitat onsite would, following project implementation, be located between two closely adjacent development polygons; these proposed adjacent development areas would include a community farm and orchard as well as urban development, and two surrounding paved access roads.

Specifically, about 48 percent of the available Quino habitat (mapped as Quino host plant polygons) on the Fanita Ranch project site would be directly affected by the currently proposed project footprint. About 25 percent of Quino habitat would be indirectly affected within a 150-meter edge effect zone we have mapped around the proposed development footprint. About 28 percent of the Quino habitat occurs outside the proposed direct footprint or edge effect zone. The one survey point occurrence known from the site in 2005 occurs within the noted edge effect zone (not within the direct project footprint) within a small area that would be completely surrounded by the proposed development.

Pursuant to the Recovery Plan for Quino, a *Possible Future Central San Diego Recovery Unit* was contemplated for the species. This potential future recovery unit in San Diego County includes vernal pool habitat on Kearny Mesa, Mira Mesa, Del Mar Mesa, and Lopez Ridge. The unit also includes inland/upland habitat in the vicinity of Sycamore and Little Sycamore

Canyons, Iron Mountain, San Vicente Reservoir, the Fortuna Mountain area, El Capitan Reservoir, the community of Alpine, and south to the Southwest San Diego Recovery Unit border near the community of Jamul. The unit location described includes Fanita Ranch, and this general area is expected to be the only suitable location in the coastal metapopulation's distribution available and expected to support the species. Loss of the Quino habitat, per the current proposal on the Fanita Ranch site, may preclude recovery of the species. Moreover, based on the current declining status of the species, Quino habitat on Fanita Ranch should be conserved to provide for the Quino metapopulation in the area. As noted above, Quino requires conservation of temporarily unoccupied patches of habitat essential to maintain population resilience (Service 2009). The edge effects and habitat fragmentation that would likely result from the proposed development would eliminate or considerably reduce the long-term viability of the Quino in the project area and limit the species ability to expand or re-populate the area locally.

Conclusion: After our review of the current status of the species, current and future threats, and the proposed project footprint and reserve areas, we conclude that the Fanita Ranch proposed project would not fully minimize and mitigate its impacts on Quino, would result in a net loss of Quino habitat function, and would have a high potential to preclude recovery of the species. As such, absent modifications to the Fanita Ranch project design, we recommend that the Quino be deleted from the proposed covered species list for the overall Subarea Plan.

Hermes Copper Butterfly:

Status: Hermes copper butterfly (Hermes copper) became a Federal candidate species in 2011. In the United States, the current range of Hermes copper is entirely within San Diego County and consists of approximately 29 percent Federal land, 4 percent State land, 15 percent local government land, and 52 percent private land. Most occurrences of the species are concentrated in the southwest portion of the County (Marschalek and Klein 2010). Two or three occurrences have been identified in Baja California, Mexico, within an area approximately 100 miles south of the International Boundary (Brown *et al.* 1992; Marschalek and Klein 2013); this species has not been reported from Mexico since the 1980s (Marschalek and Klein 2013). The species occupies less than half of its former range in San Diego (Brown 1991).

Hermes copper is an extremely rare butterfly that inhabits coastal sage scrub and southern mixed chaparral (Marschalek and Deutschman 2008; Marschalek 2016a). Hermes copper larvae use only spiny redberry (*Rhamnus crocea*) as a host plant (Thorne 1963; Emmel and Emmel 1973). The range of spiny redberry extends throughout much of coastal California, as far north as Sonoma County (Calflora 2016); however, Hermes copper has never been documented north of San Diego County (Marschalek and Klien 2013; Service GIS database 2016). Therefore, some factor(s) other than host plant availability limits the range of the species. Researchers report adults are rarely found far from spiny redberry (Thorne 1963) and take nectar almost exclusively from California buckwheat [*Eriogonum fasciculatum* (Marschalek and Deutschman 2008)]. The densities of larval host and nectar plants required to support a Hermes copper population are not known. Natural wildfire regimes for the species in the past likely included occasional large fires, but recolonization events following large fires in 2003 and 2007 have been rare, suggesting that current dispersal of the species is quite limited (Strahm *et al.* 2012). However, historical

dispersal data do not exist, thus the expected length of time for recolonization is unknown (Strahm *et al.* 2012).

Hermes copper range and population distributions likely consist of 59 historical populations, of which 21 are extant, 27 are extirpated, and 11 are of unknown status. In 2000, 37 populations were thought to be extant. Between that time and 2014, 10 populations have been extirpated (1 by development, 1 by fire and development, and 8 by fire alone), and 6 are of unknown status. In the northern portion of the range, most remaining suitable habitat is limited to the relatively isolated and fragmented undeveloped lands between the cities of San Marcos, Carlsbad, and Escondido and the community of Rancho Santa Fe, and the habitat islands containing occurrences on Black Mountain and Van Dam Peak. In the southern portion of the range, all extant populations except Lopez Canyon, the southern portion of Mission Trails Park, Lakeside Downs, and Boulder Creek Road (isolated from other extant populations by development and fire) are within relatively well-connected undeveloped lands east of the City of El Cajon that are between the perimeters of the 2003 Cedar Fire and 2007 Harris Fire. The Mission Trails Park Hermes copper population remains extant even after approximately 74 percent of the occupied area burned in 2003, presumably because burned areas were recolonized (after host plant and nectar sources regrew) by butterflies from nearby unburned areas.

Marschalek and Klein (2010) studied intra-habitat movement of Hermes copper using mark-release-recapture techniques. They found the highest median dispersal distance for a given site in a given year was 146 feet (ft) (45 meters), and their maximum recapture distance was 0.7 mile (mi) (1.1 kilometer) (Marschalek and Klein 2010). They also found no adult movement across non-habitat areas, such as type-converted grassland or riparian woodland (Marschalek and Klein 2010).

Threats and Conservation Needs: The current distribution of Hermes copper habitat in San Diego County is largely a result of urban development within coastal and interior San Diego County, which has resulted in the loss and fragmentation of Hermes copper habitat (CalFlora 2010; Consortium of California Herbaria 2010; San Diego County Plant Atlas 2010). Habitat loss due to urbanization and impacts of recent wildfires has greatly restricted its range (Marschalek 2016a). Of the 27 known extirpated Hermes copper populations, loss and fragmentation of habitat as a result of development has contributed to the extirpation of 13 populations (48 percent).

The combined impacts of existing development, limited future development, existing dispersal barriers, increasing wildfire frequency, and megafires (wildfires that encompass atypically vast areas) could further fragment Hermes copper habitat and likely threaten the species (Service 2011). These threats are evidenced by the relatively recent loss or isolation of many populations throughout the range and the fact that remaining extant populations occur within areas of high megafire risk.

Fire: The coastal sage scrub and southern mixed chaparral natural communities experience relatively frequent fires, so the long-term survival of most species post-fire depends on the rate of recolonizations exceeding the rate of local extirpations. Recolonization of these post-wildfire habitats often requires long-distance dispersal events, but these movements can also counter

detrimental impacts associated with inbreeding (Marschalek 2016a). Marschalek's (2016b) research has documented several recent extirpations of Hermes copper, due to the 2003 and 2007 wildfires, but few recolonizations despite what appears to be extant suitable habitat. Although a few small populations exist within and north of the City of San Diego, the majority of Hermes copper individuals are currently found to the east and southeast of the City between the footprints of 2003 and 2007 fires (Marschalek 2016b). Historic occurrences within the adjacent Marine Corps Air Station Miramar are presumed to have been temporarily extirpated as a result of the 2003 wildfire that burned in that area (SDGE and SCG 2015).

The recolonization rate for Hermes copper appears to be quite slow, indicating that this species is vulnerable to long-term effects from fires (Marschalek and Klein 2013). However, dependence on a fire-prone vegetation community provides evidence that Hermes coppers have been able to coexist with fire in the past (Marschalek and Klein 2013). With vegetation recovering to suitable conditions for the butterfly, habitat function does not appear to be limiting them currently. Restricted dispersal is likely the reason for slow recolonization of the post-wildfire areas (Marschalek and Klein 2013). The long-term persistence of Hermes copper in a fire-prone landscape depends on them dispersing and reestablishing populations following a fire, but this has to happen before another fire kills the source population/occurrences that would provide those dispersing individuals (Marschalek and Klein 2013). Habitat fragmentation due to human activities, resulting in restricted movement of Hermes coppers and limited dispersal into burn areas, is a possible reason for the current slow recolonization rates despite the historic ability to persist with fire (Marschalek and Klein 2013; Marschalek 2016b). Fire (given recent sizes and return intervals) poses a substantial threat to the Hermes copper (Marschalek and Deutschman 2016); given its current extremely restricted distribution, the species is highly vulnerable since one large fire could cause further extirpations or extinction (Marschalek 2016b).

Fragmentation and Edge Effects: Habitat fragmentation typically results in smaller, more vulnerable Hermes copper populations (Service 2011). The presence of suitable habitat on which the Hermes copper depends often determines the size and range of the local population (Service 2011). Wildfires and past development have caused habitat fragmentation that separates populations and inhibits movement by creating a gap in area that Hermes copper are not capable of traversing (Service 2011). The connectivity of habitat occupied by a butterfly population is not defined by host plant distribution at the scale of host plant stands or patches, but rather by adult butterfly movement that results in effective interbreeding (Service 2003). Fragmentation can include prevention of movement by a barrier, or by distances between remaining host plants where larvae develop ending up greater than adult butterflies will functionally move to mate or deposit eggs. Deutschman *et al.* (2010) concluded that Hermes copper individuals are likely capable of long-distance movement, but developed areas and natural landscape features may enhance or restrict dispersal (Service 2011). It is important to note that although movement of the species may be possible, the habitat must be suitable at the time Hermes copper butterflies arrive to ensure successful recolonization, which is difficult with many predicted post-wildfire and mega-fire conditions (Service 2011).

Based on genetic research, Marschalek (2016a) concluded that historically Hermes copper butterflies were able to move among habitat patches prior to recent changes in the landscape. More recently, low post-fire recolonization rates suggest limited dispersal is occurring currently,

probably due to recent habitat fragmentation as discussed above. This fragmentation is a relatively new event, as the human population in San Diego County experienced substantial growth in the late 20th century (Marschalek 2016a).

Drought: Drought is a stochastic weather event. Few Hermes copper adults have been observed rangewide during the last 2 years due to the drought, particularly west of the Cleveland National Forest (Marschalek and Deutschman 2016). It is likely that the continued drought conditions suppress adult emergence (Marschalek and Deutschman 2016). Researchers have documented adult numbers rebounding following a 1-year drought (Marschalek and Deutschman 2015), but it is unclear how multiple years of extremely dry conditions have and will impact the species (Marschalek and Deutschman 2016). It is expected that Hermes copper individuals typically enter diapause during droughts and may emerge when the area receives adequate winter precipitation.

Climate Change: Butterfly species are typically sensitive to climate change due to their larval host plant and nectar-source dependence (Murphy and Weiss 1992). If the timing of host-plant availability changes without equal shifts in life-cycle timing, the phenological mismatch would likely affect reproductive success. In addition, the narrow habitat requirements of butterflies and host plants may lead to shifts in range, distribution, and abundance as a result of climate change. Nevertheless, given the temporal and geographical availability of their relatively widespread perennial host and nectaring plants, Hermes copper and its host and nectar plants are not likely to be negatively affected throughout the majority of the species' range by predicted phenological shifts in development of a several days (unlike species such as Quino checkerspot that depend on annual host plants) (Service 2011). While it is possible the species' climatic tolerance, such as temperature thresholds for activity, could result in a change in the species niche and distribution of suitable habitat as the climate changes, predicting such changes would be speculative because we currently do not understand what limits the species' range to a much smaller geographic area than its host and nectaring plants (Service 2011).

Conversely, expected increases in fire frequency and intensity (described herein), as well as increased extended drought frequencies/intensities/durations predicted under climate change for the region, are likely threats to Hermes copper. This is largely due to increased direct individual mortality from fire and increased potential for extirpation of occurrences through megafire and invasion of exotic grasses (noted above) causing suppression of nectar plants. These conditions could be worsened by the potential synergistic effects with extended suppression of emergence of adults during continued droughts.

Proposed Project: Surveys were conducted on the project site for the Hermes copper in 2001, 2003, 2004, 2005, 2014, and 2016, and the species was observed on the Fanita Ranch project site in 2001, 2003, 2004, and 2005 (Service GIS database 2016). Hermes copper was not detected in the 2014 and 2016 surveys conducted on the Fanita Ranch the site. As noted above, rangewide surveys conducted on sites known to support the species over multiple years (sentinel monitoring sites) observed greatly reduced numbers of Hermes copper over the past 2 years due to drought conditions. The drought conditions experienced in San Diego County are likely suppressing adult emergence (Marschalek and Deutschman 2016). A lack of detection on the Fanita Ranch site in 2014 and 2016 is expected considering current conditions.

Pursuant to the Draft City of Santee Multi-Species Conservation Program Subarea Plan Conservation Strategy for the Hermes Copper [Conservation Strategy (EDAW 2009)] prepared for the City of Santee, it was envisioned that the City of Santee would maintain a viable Hermes copper population and potential for natural recolonization of Hermes copper butterfly by conserving large blocks of habitat and supporting conservation efforts. The Conservation Strategy anticipated work with private landowners to conserve existing known populations within Santee, including associated host plant and nectar sources on occupied as well as unoccupied habitat. Based on the Conservation Strategy, two historical colonies occur on Fanita Ranch. The goals and objectives in the Conservation Strategy for habitat recommend the preservation of 100 percent of occupied Hermes habitat.

Based on the vegetation, habitat, and footprint maps provided to us by HomeFed, and after applying a 150-meter edge effect zone around the proposed direct development footprint, the currently proposed Fanita Ranch footprint would impact directly or indirectly through edge effects much of the Hermes copper habitat within the project site. It would also fragment almost all remaining habitat patches within the site. Specifically, about 23 percent of the available Hermes copper habitat (mapped spiny redberry shrub polygons) on the Fanita Ranch project site would be directly affected by the currently proposed project footprint, and about 23 percent of Hermes copper habitat would be indirectly affected within the 150-meter edge effect zone around the proposed development footprint. About 54 percent of the Hermes copper habitat would occur in open areas remaining outside of the direct footprint or edge effect zone. Based on survey point data collected from the site over the years, 50 percent of known occurrences occur within the proposed direct project footprint, none occur within the 150-meter edge effect zone, and 50 percent occur outside either of these areas.

The combined direct effects, edge effects, and habitat fragmentation resulting from the project as currently proposed would considerably reduce the viability of the Hermes copper population in the project region and likely greatly limit the species' ability to repopulate locally following a large fire or other substantial disturbances. The end result would not be consistent with the City's 2009 Conservation Strategy for the species.

As is the case for Quino checkerspot butterfly, the Hermes copper displays a metapopulation structure, and it similarly requires conservation of temporarily unoccupied patches of habitat for population resilience and viability. Maintaining unfragmented suitable habitat areas contiguous with occupied habitat for recolonization is essential for the long-term survival of the species. The Wildlife Agencies maintain that conserving a Hermes copper population that includes the Fanita Ranch site is essential for the Hermes copper due to site's demonstrated ability to support this narrow endemic species and its rangewide poor status.

Conclusion: After our review of the current status of the species, current and future threats, and the proposed project footprint and reserve areas, we conclude that the current proposed Fanita Ranch project would not fully minimize and mitigate its impacts on Hermes copper, would result in a net loss of function of its habitat, and would have a high potential to preclude recovery of the species. As such, absent modifications to the project design, we recommend that the Hermes copper butterfly be deleted from the proposed covered species list for the overall Subarea Plan.

Coastal Cactus Wren:

Status: The coastal cactus wren is a former Federal candidate species, a California State Species of Concern, and a NCCP Focal Species (a target of conservation planning). Survival of the coastal cactus wren is considered one of the great challenges in bird conservation for southern California (Unitt 2004). A year-round resident of the dry landscapes of southern California's Pacific-slope, the coastal cactus wren has historically maintained a limited distribution in coastal southern California and extreme northwestern Baja California (Harper and Salata 1991). The subspecies is unique in that it occurs exclusively within the subset of the coastal sage scrub plant community with sizable cactus, ranging from Ventura County south into San Diego County, California, and northwestern Baja California, Mexico.

The coastal cactus wren, a habitat specialist of southern cactus scrub, builds its nests almost exclusively in mature stands of coastal cholla (*Cylindropuntia prolifera*) and prickly pear cactus (*Opuntia littoralis* and *O. oricola*) that are tall enough to support and protect their nests. These well-protected nests serve as roosts for adults and juveniles throughout the year.

The decline of coastal cactus wren populations rangewide is indicative of the significant loss of the coastal sage scrub plant communities that contained cactus (Solek and Szijj 2004). Populations of coastal cactus wrens have declined dramatically over the past couple decades, with extirpation from many locations as a result of habitat loss from development and agricultural conversion, habitat fragmentation, edge effects of development, and catastrophic fires (O'Leary 1995; Solek and Szijj 2004); major declines for the species have occurred as a result in Orange and San Diego counties (Rea and Weaver 1990). Some populations in Los Angeles County are declining or may be extirpated, and Ventura County populations have been severely reduced by development. Geographic isolation of coastal and interior populations has also been considerably increased by urbanization, and this may be facilitating genetic differentiation between these segments of the population (Rea and Weaver 1990; Eggert 1996). Based on information from historical and more recent accounts, the species has been extirpated from many locations where it previously bred (Dawson 1923; Willet 1933; Grinnel and Miller 1944; Rea and Weaver 1990; Eggert 1996).

Extensive urban development in coastal southern California has led to habitat loss and fragmentation resulting in small, isolated coastal cactus wren populations. Population viability analyses suggest that the small size of the remaining coastal cactus wren subpopulations coupled with habitat fragmentation likely constrains the long-term viability of species (Ogden Environmental and Energy Services 1992). Dispersal between remaining populations is likely constrained by development and/or distance, increasing the potential for local extinction and limiting recolonization. Remnant patches of cactus scrub are also subject to edge effects that likely impact coastal cactus wren reproduction and survival and affect population dynamics (Preston and Kamada 2012). Exotic plant species often invade habitat fragments and can alter the structure and composition of native cactus scrub, potentially affecting wren foraging and breeding (Preston and Kamada 2012). Mortality and nest predation may also be high within habitat fragments because of changes to the predator community associated with urban development and human activities, which subsidize mesopredators in particular (Preston and Kamada 2012).

Most dispersing cactus wrens are known to move less than 1 kilometer, with some individuals moving up to 10-11 km (Barr *et al.* 2012; Preston and Kamada 2012; Kamada and Preston 2013). Genetic analysis shows that individuals in the Otay coastal cactus wren population tend to move less than 5 km (Barr *et al.* 2012).

Threats and Conservation Needs: Coastal cactus wren occurrences face many threats in southern California. A primary threat is altered fire regime that causes direct mortality of birds and often temporarily destroys cactus scrub, which can take many years to recover (Bontrager *et al.* 1995; Mitrovich and Hamilton 2007; Hamilton 2008; Leatherman BioConsulting 2009). Other threats include invasive plant species reducing open habitat for foraging, declines in productivity during drought, and predation by domestic cats, roadrunners, snakes, loggerhead shrikes, corvids, and Cooper's hawks (Preston and Kamada 2012; Kamada and Preston 2013; The Nature Conservancy 2015). Recent declines of coastal cactus wrens in areas of Orange and San Diego counties that have not recently burned have been attributed to reduced annual productivity and survivorship and increased population isolation resulting from urban development and new road construction, impacts of edge effects from development, low productivity corresponding with food limitation during multiple years of below average rainfall, high predation rates, and mortality from West Nile Virus. (Preston and Kamada 2012; The Nature Conservancy 2015).

Small, isolated populations are vulnerable to local extinction, likely due to insufficient habitat and limited ability of coastal cactus wrens to disperse through habitat fragmented by urbanization (Barr *et al.* 2015). Small populations affected by habitat degradation from urban edge effects are often subject to low productivity (# fledglings/pair/year) related to limited food resources and nest predation, high juvenile mortality with low levels of recruitment into the breeding population, and potentially higher levels of predation on fledglings and adults (Preston and Kamada 2012; The Nature Conservancy 2015). These factors may combine, and be exacerbated by regional variables such as drought, such that sustaining small populations is less likely. In one monitoring study, sites with fewer than four coastal cactus wren territories were highly variable in occupancy between 1999 and 2004, whereas sites with more birds tended to remain occupied over time (Hamilton 2004). During the extreme 2007 drought, birds disappeared from some sites with small numbers of pairs, and most of these sites have not been re-colonized (The Nature Conservancy 2015).

Fire: While urbanization is the primary driver of habitat loss and fragmentation in coastal southern California, wildfires can also temporarily eliminate cacti and cactus wren habitat (Bontrager *et al.* 1995; Preston and Kamada 2012). Coastal sage scrub habitat and many obligate species can recover rapidly and indeed benefit from wildfire (Westman 1981); however, burned areas may remain unsuitable for cactus wrens for years. Over the past two decades, unusually large and intense wildfires caused significant loss or degradation of coastal sage scrub habitat in coastal southern California, including large expanses of cactus scrub; this has reduced the abundance of cactus wrens and adversely affected cactus wren populations across the region (Mitrovich and Hamilton 2006; Hamilton 2008; Preston and Kamada 2012). One of the very large recent fires in San Diego County included the Fanita Ranch project area in 2003. Wildfires are prevalent in the project area and represent a primary threat to cactus wren populations (Barr *et al.* 2015).

Wildfires are natural disturbances for coastal sage scrub, but their frequency, size, and intensity have been increased over the last several decades as a result of urbanization and human activities (Syphard *et al.* 2007). Recent wildfires have become a major threat to cactus wrens in coastal southern California, and fires can be particularly harmful when combined with artificially small and isolated populations (Barr *et al.* 2015). An altered wildfire regime coupled with other effects of urbanization are likely acting in concert to amplify loss of genetic diversity and connectivity for coastal cactus wrens in some sites (Barr *et al.* 2015). Major losses in cactus wren territories have been documented after recent fires, including central and coastal Orange County (Mitrovich and Hamilton 2006; Leatherman BioConsulting 2009), San Pasqual (Hamilton 2008), and Palos Verdes (Cooper 2010).

The slow recovery of the coastal cactus wrens in many southern California reserves and undeveloped areas post-fire has been attributed to the habitat specialization of the species. The southern cactus scrub plant community is susceptible to high intensity fires; with the slow growth rates of cactus and the coastal cactus wren's need for mature cactus structure, recovery times for this habitat following a wildfire are sometimes on the order of decades. Following a wildfire, it often takes many years for cactus to grow back to a size sufficient to again support breeding cactus wrens (Proudfoot *et al.* 2000; Solek and Szijj 2004).

Fragmentation and Edge Effects: Coastal cactus wrens are known as an interior species, and edge effects typically have negative impacts on the population dynamics of interior species (Kristan *et al.* 2003). Kristan *et al.* (2003) found considerable reductions in coastal cactus wren abundance within 10 m and at 250 m from development-wildland edges as compared to sites more than 1000 m from edges, at locations in Orange, Riverside, and San Diego counties. This species is poorly adapted to cope with edge-related conditions, such as increased predation and vegetation degradation, that they rarely encounter in their common interior habitats (Temple and Cary 1988; Vaughan 2010), but cactus wrens do not appear to be subject to reductions in habitat use through edge aversion (Kristan *et al.* 2003). Given their limited dispersal capabilities (Preston & Kamada 2012; Kamada & Preston 2013) and their tendency to be one of the first species to become locally extinct in recently isolated habitat patches (Crooks *et al.* 2001), cactus wrens appear to be highly sensitive to habitat fragmentation and edge effects.

Proposed Project: Surveys were conducted on the project site for the coastal cactus wrens in 1992, 1997, 1998, and 2002. The species was detected on the site in all of those years in the center and southern center portions of the project site (Service GIS database).

Based on the vegetation, habitat, and footprint maps provided to us by HomeFed, and after applying a 150-m edge effect zone around the proposed development footprint, the currently proposed Fanita Ranch footprint would directly, or indirectly through edge effects, impact much of the coastal cactus wren habitat within the project site. It would also fragment almost all remaining (and passively restoring) cactus scrub habitat patches within the site. Based on survey point data collected from the site available in our database, about 72 percent of occurrences fall within the proposed direct project footprint, 9 percent occur within the 150-m edge effect zone, and 18 percent occur outside either of these areas. The combined direct effects, edge effects, and habitat fragmentation of the project as currently proposed would considerably reduce the

viability of the coastal cactus wren population in the project region and likely greatly limit the species ability to repopulate locally following a large fire.

As is the case for Quino checkerspot and Hermes copper butterflies, the coastal cactus wren displays a metapopulation structure, and it similarly requires conservation of both occupied and temporarily unoccupied patches of habitat for population resilience and viability. Maintaining unfragmented suitable habitat areas contiguous with occupied habitat for recolonization is essential for the long-term survival of the species. Conserving a coastal cactus wren population that includes the Fanita Ranch site is essential for this species due to its rangewide poor status.

Conclusion: After our review of the current status of the species, current and future threats, and the proposed project footprint, we conclude that the Fanita Ranch project as proposed would not fully minimize and mitigate its impacts on coastal cactus wren, would result in a net loss of function of its habitat, and would have a high potential to preclude the long-term survival of the species. As such, absent modifications to the project design, we recommend that the coastal cactus wren be deleted from the proposed covered species list for the overall Subarea Plan.

Western Spadefoot Toad:

Status: The Service was petitioned to list the western spadefoot toad (spadefoot) in 2012. In 2015 the Service determined the spadefoot petition contained substantial information and initiated in-depth reviews of the species. The spadefoot is a California Species of Special Concern and California Protected Species (California Protected are taxa that fall under special protection within the California Fish & Game Code; §5050 for reptiles and amphibians). The spadefoot is nearly endemic to California, and historically ranged from the vicinity of Redding in Shasta County southward to Mesa de San Carlos in northwestern Baja California, Mexico (Stebbins 1985).

The western spadefoot toad currently occurs east of the coastal ranges southward from Ventura County, California, to northern Baja California, Mexico, south and west of the Transverse and Peninsular ranges. The species also occurs along the valley floors and foothills of the Central Valley and the coastal valleys of western Santa Barbara, eastern San Luis Obispo and Monterey, and western San Benito counties of California (U.S. Fish and Wildlife Service 2005). The spadefoot has been extirpated throughout most of the lowlands of southern California (Stebbins 1985). Estimates of loss of historical habitat range from 30 percent in northern California to 80 percent in southern California (Jennings and Hayes 1994). Throughout most of the year the spadefoot is found in areas of open vegetation and short grasses (typically coastal sage scrub, chaparral, and grasslands) where the soil is sandy or gravelly. It breeds during the winter (January through May) in ephemeral ponds and vernal pools, formed by heavy winter rains that are devoid of bullfrogs (*Rana catesbeiana*), fish, and crayfish (*Pacifastacus leniusculus* and/or *Procambarus clarkii*) (SDGE & SCG 2015). During the dry season of the year, spadefoots live beneath the soil surface in burrows in upland habitats relatively near to breeding pools (AMEC 2003).

Threats and Conservation Needs: Spadefoot toads are threatened by habitat loss (urbanization, road construction, etc.), off-road vehicular traffic, drying of pools for agricultural uses, modified

hydro-period of temporary pools associated with irrigation, illegal dumping, livestock grazing and other direct or edge effects that degrade or eliminate habitat function. Road construction/use often results in direct mortality of spadefoots (e.g., driving through breeding pools) and can cause direct loss and fragmentation of habitat. Non-native aquatic animals, such as mosquito fish and bullfrogs, have been implicated in the decline of the spadefoot, either through competition or predation in some breeding habitats (Jennings and Hayes 1994). Mosquito control measures (e.g., introduced mosquito fish in detention basins) in occupied spadefoot habitat can harm spadefoots (Jennings and Hayes 1994; Fisher and Shaffer 1996; AMEC 2003).

Activities that produce low frequency noise and vibration, such as grading for development and seismic exploration, in or near habitat for spadefoots, may be detrimental to the species. Dimmitt and Ruibal (1980) determined that spadefoots were extremely sensitive to such stimuli and would break dormancy and emerge from their burrows at inappropriate times in response to these disturbances. Spadefoots often breed in road ruts and other depressions with pooled water along dirt roads, and vehicles traversing through occupied pools likely results in the loss of spadefoots.

Spadefoots require two distinct habitat components in order to meet their life history requirements, and these habitats likely need to be unconstrained, intact, and in close proximity for long-term viability. Spadefoots are primarily terrestrial, and require upland habitats for feeding and for constructing/utilizing burrows for their long dry-season dormancy. However, little is known regarding the distance that spadefoots typically range from aquatic (breeding) resources for dispersal, foraging, and estivation. Current research on amphibian conservation suggests that average habitat utilization falls within 370 m of aquatic habitats (Semlitsch and Brodie 2003). Typical of amphibians, wetland habitats are required for reproduction. Spadefoot eggs and larvae have been observed in a variety of permanent and temporary wetlands including rivers, creeks, pools in intermittent streams, vernal pools, and temporary rain pools (California Natural Diversity Database 2000), indicating a degree of ecological plasticity. However, it appears that vernal pools and other temporary wetlands may be optimal for successful breeding due to the absence or reduced abundance of both native and non-native predators, many of which require more permanent water sources. Fisher and Shaffer (1996) reported an inverse relationship between the presence of western spadefoot toads and that of nonnative predators.

It is likely that functional connectivity corridors or linkages between populations are essential for the conservation of spadefoot metapopulations (Service 2004). In any given spadefoot metapopulation, it is expected that some subpopulations will disappear, but the habitat they occupied will eventually be recolonized if it remains acceptable (Service 2004). To enable natural recolonization of unoccupied habitat, and to allow for gene flow that is vital for preventing inbreeding, effective opportunities for dispersal and interbreeding among subpopulations of the spadefoot need to be maintained (Service 2004).

Roads: Roads represent a threat to the spadefoot (Service 2005). Road construction can result in direct mortality of the western spadefoot toad, and can cause direct loss and fragmentation of habitat (Service 2005). Mortality of western spadefoot toads from motor vehicle strikes has been observed by multiple researchers (Morey and Guinn 1992; Jennings 1998; California Natural Diversity Database 2000). For instance, Jennings (1998) reported road mortality at all seven sites that he surveyed in Kings and Alameda counties. Roads can be a barrier to spadefoot movements

and effectively isolate populations (Service 2005). Roads are significant barriers to gene flow among common frogs (*Rana temporaria*) in Germany, which has resulted in genetic differentiation among populations separated by roads (Reh and Seitz 1990). Similarly, Kuhn (1987, *in* Reh and Seitz 1990) determined that approximately 24 to 40 cars per hour on a given road resulted in mortality of 50 percent of common toads (*Bufo bufo*) attempting to migrate across the road. In another study, Heine (1987, *in* Reh and Seitz 1990) identified that 26 cars per hour resulted in 100 percent mortality of common toads attempting to cross a road.

Fragmentation and Edge Effects: Fragmentation of spadefoot habitats through habitat loss typically produces small populations that are increasingly isolated and limited in space, which reduces the movement of individuals and genetic exchange between populations (Butte County Association of Governments 2011). Small, isolated populations are highly susceptible to extinction caused by catastrophic or stochastic events. Isolation also limits the ability of the population to recolonize areas with suitable habitat where western spadefoot toads may have been present in the past (Butte County Association of Governments 2011).

Climate Change: Amphibians' permeable skin, biphasic life cycles, and unshelled eggs make them sensitive to small changes in temperature and moisture (Carey and Alexander 2003). In most cases, amphibians in temperate climates can tolerate wide variations in temperature, but their dependence on aquatic environments for reproductive success could be compromised by changes in seasonal and regional climatic patterns. Decreases in precipitation or shifts in timing of precipitation would have an effect on reproductive success and adult survivorship due to increased risk of desiccation, reduced food supply, and increased predation due to reduced habitat availability. Such changes could lead to shifts/changes or net reductions in range, distribution, and/or abundance.

Proposed Project: The spadefoot was detected on the proposed Fanita Ranch in the surveys conducted for this species in 2004 and 2005, primarily in the area of northern portion of the project site. The currently proposed Fanita Ranch footprint would directly or indirectly impact most of the remaining habitat within the site. Based on spadefoot survey point data for the site, about 29 percent of occurrences occur within the proposed direct project footprint, 39 percent occur within the 150-m edge effect zone, and 32 percent occur outside either of these areas. The edge effects due to the proposed development, and habitat fragmentation would reduce the viability of the spadefoot on the Fanita Ranch project site.

Conclusion: Within the MSCP, the spadefoot has not received coverage under any of the subarea plans. After our review of the current status of the species, current and future threats, and likely effects of the proposed project footprint, we conclude that the Fanita Ranch project as proposed would not fully minimize and mitigate its impacts on spadefoot and would result in a net loss of function of its habitat. As such, absent modifications to the project design, we recommend that the spadefoot be deleted from the proposed covered species list for the overall Subarea Plan.

San Diego Goldenstar:

Status: San Diego goldenstar is a native geophytic (emerges from an underground storage structure, e.g. bulb, corm, tuber, etc.) perennial herb that is restricted to southern San Diego County and northern Baja California, Mexico. It is a Federal Species of Concern. San Diego goldenstar is currently a covered species in the Subregional Multiple Species Conservation Program (MSCP), and is covered by a series of regional subarea plans, including the City of San Diego, City of Poway, and the County of San Diego. The City of Santee is currently proposing to cover San Diego goldenstar as a Rare and Narrow Endemic species under its proposed Subarea Plan.

The California Natural Diversity Database (CNDDDB) currently estimates that there are 101 populations presumed extant, five which are possibly extirpated, and nine which are presumed extinct within the species' range (CNPS, 2010-14). The San Diego Management and Monitoring Program (SDMMP) notes that there are 33 populations on conserved lands in Management Units 3, 4, and 6 (SDMMP 2010). Current SDMMP data shows that on conserved lands within the MSCP there are nine large occurrences (> 10,000 individuals), 13 small occurrences (<10,000 individuals) including Rattlesnake Mountain in Santee, and two populations of unknown size (SDMMP, unpublished data 2016).

The MSCP originally rationalized coverage for San Diego goldenstar based on conservation of eight of 11 populations with >500 individuals within the MSCP, conservation of 125 of the 144 known occurrences (86 percent conservation), and conservation of 38 percent of its grassland habitat. It was strongly considered for categorization as a narrow endemic species in the MSCP subregional plan, which would have necessitated higher level of conservation for individual projects as they came forward. Undeveloped lands in the City of Santee support a major population of the species, as documented in the conservation analysis performed in 1995 and 1996 and surveys on the Fanita Ranch site. Current data show that there are more populations than originally identified in the MSCP, with nine conserved populations exceeding 10,000 individuals.

Threats and Conservation Needs: The primary threats identified relative to this species are habitat loss from various urban development and landfill expansion projects expected in southwestern San Diego County. Additional threats to this species include impacts from habitat degradation, exotic plant competition, trampling, vehicular traffic, road construction, illegal dumping, edge effects, and bulb collecting (SDCWA 2010). Drought, fire regime changes, and herbivory burrowing mammals such as pocket gophers (*Thomomys* sp.) also likely exacerbate the noted anthropogenic impacts.

Edge Effects: Similar to the threats mentioned above, competition from annual plants is likely increased adjacent to development edges. Increased runoff and irrigation from development can also promote competition from invasive exotic plants, which is a major threat to goldenstar populations through displacement and competition (Cione *et al.* 2002; Cox *et al.* 2008; Hillerislammers *et al.* 2010). Non-native species of particular concern are annual grasses such as wild oats (*Avena* sp.) and herbaceous weeds including storksbill (*Erodium* sp.), as they are very widespread. Trampling due to public use is also a threat near developed areas.

Nitrogen deposition: As noted elsewhere herein, N deposition is implicated in the increased exotic grass invasions occurring in the vegetation communities where San Diego goldenstar occurs. N deposition and the resultant exotic grass competition for light and water poses a significant threat to San Diego goldenstar.

Climate Change: As noted elsewhere herein, climate change, as modeled for the region, is predicted to result in an increase in both fire frequency and intensity in the project area. Increases in fire frequency are associated with invasion of exotic plants into coastal sage scrub, chaparral, and native grasslands in the project region (Zedler *et al.* 1983; Hamilton 1997; D'Antonio *et al.* 1999; Keeley *et al.* 2005; Baker 2006; Talluto and Suding 2008; Keeley and Brennan 2012), and the resultant exotic grass competition for resources poses a significant threat to San Diego goldenstar.

Proposed Project: Fanita Ranch is the largest remaining block of habitat for the species within the Santee subarea. San Diego goldenstar has been consistently observed on the property during surveys performed from 2002-2016. The most recent surveys mapped areas of San Diego goldenstar as polygons of occupied habitat as well as other smaller occurrences as individual points. Over 1,000 individuals were counted in the course of the surveys. Based on mapped goldenstar occurrence data/habitat polygons for the Fanita Ranch site, about 40 percent of goldenstar habitat occurs within the proposed direct project footprint, 12 percent occurs within the 150-m edge effect zone, and 48 percent occurs outside either of these areas.

The City reportedly plans to identify San Diego goldenstar as a narrow endemic species in their forthcoming Subarea Plan. As such, this designation would require a minimum of 80 percent conservation (avoidance) of newly discovered populations per the requirements of the MSCP. This would theoretically help conserve goldenstar across the Santee Subarea. However, because very few large undeveloped parcels other than Fanita Ranch remain for development in the City, it is unlikely that additional major populations are likely to be discovered in the Santee Subarea.

Conclusion: The Fanita Ranch project, as proposed, would apparently not be consistent with the Narrow Endemic policy standard, which typically requires conservation (avoidance) of a minimum of 80 percent of a population. After our review of the current status of the species, current and future threats, and likely effects of the proposed project footprint, we conclude that the Fanita Ranch project as proposed would not fully minimize and mitigate its impacts on San Diego goldenstar and would result in a net loss of function of its habitat. As such, absent modifications to the project design, we recommend that the San Diego goldenstar be deleted from the proposed covered species list for the overall Subarea Plan.

Service and CDFW letter dated 12-20-2016 Reference List in Alphabetical Order by Topic (there may be repetition across topics)

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150 Minutes of Hell

The inside story of death and survival as the Carr Fire's tornado of flames stormed Redding — and changed firefighting in a warming California

By Lizzie Johnson

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Death blew east on a savage wind, driving flames over foothills and across a river, spitting glowing embers and scrubbing the earth bare.

It was coming for Don Andrews.

His bulldozer's windows shattered, flinging glass into his face. The blue-green shards were everywhere: on the floor, inside his helmet, in his skin and eyes. He was alone and blinded. The firestorm shook the ground and roared as loud as a passing train.

I'm not going to survive this, he thought.

In three decades of firefighting, Andrews, 60, had witnessed plenty of close calls. He'd seen blistering heat melt the stickers on his dozer in Mariposa County. More than once, when flames burned over his rig, he'd summoned helicopters or planes to cover him with water or pink retardant.

About this project

After reporting on the Carr Fire in July, reporter Lizzie Johnson, working with Chronicle photographers, graphic artists and digital producers, sought to reconstruct in detail the deadly fire tornado that swept into Redding three days after the blaze ignited. The account in this story is based on exclusive interviews with survivors and family members of those killed, as well as more than a dozen other interviews with witnesses and officials, Cal Fire investigative reports, audio of 911 calls and video footage provided to The Chronicle.

But on this day, July 26, he wasn't supposed to be this close to the edge. He'd come from his home in Orland in Glenn County for a fairly routine contract assignment at the Carr Fire in Shasta County, hired by the state's Cal Fire agency to carve a thick ring of dirt around a subdivision of homes. The containment lines were three dozer blades wide and designed to halt the advance of the wildfire, which was still miles away.

What Andrews didn't know was that the Carr Fire — to that point a dangerous but rather ordinary California inferno — was about to spawn something monstrous: a fire tornado the likes of which the state had never seen.

The vortex of air ripped around a column of rising heat, flames licking its walls. A freak of meteorology, it would annihilate everything in its path, uprooting trees and crumpling electrical towers. For the men and women who spend their summers on the fire lines, the tornado was an ominous glimpse of the extremes our warming climate will bring.

As Andrews' focus turned from plowing defensible space to warding off potentially fatal burns, several others in the twister's path — firefighters, bulldozer drivers and residents not yet evacuated from their homes — faced similar peril.

Death was stalking each of them. Over 150 hellish minutes, they would claw for survival. Some would forge narrow escapes. Some would become heroes. Several

wouldn't live through the night.

Andrews had little choice but to hunker down. He gripped the dozer's protective foil curtains closed with his left hand to keep the wind from batting them open. With his right hand, he pulled his shirt over his nose and mouth. The heat seared his throat.

This was how most firefighters died, he knew. Not from flames, but their own bodies roasting. Temperatures within the tornado soared to 2,700 degrees, flames blasting into the sky. A nearby Cal Fire truck exploded.

Andrews dialed 911. His singed hands trembled.

A dispatcher answered, on the verge of tears. Dozens of others had phoned in already describing the unfolding hell. Now, here was a call from ground zero.



Press play to watch Don Andrews' cellphone video and hear an edited version of his 911 call recorded later.

911 your emergency.

“I don’t know how long I can last,” Andrews told her. “I need to get out of here.”

“If you can, get out safely, OK?”

“I can’t. It’s all on fire around me. Don’t risk anybody’s life for mine.”

5:30 p.m.

Seeing the monster

Even before the tornado formed, California’s fire season had been unrelenting. The ruinous Wine Country wildfires the previous year began to seem less a singular catastrophe than a foreshadowing.

In 2017, fires had set new state records for size and destruction. Those records would fall again this year as flames threatened Yosemite National Park, torched mansions in Malibu and, in the worst fire in California history, wiped out the Sierra foothills town of Paradise. Ninety-three civilians and six firefighters would die.

The tornado signified with horrifying clarity the reality California faces. As wildfire season intensifies, conflagrations will increasingly defy efforts to control them, becoming more powerful and erratic as they race into communities, striking in ways that once seemed unfathomable.

“As much as I hate to say it, this is what the future of wildfires looks like,” said Daniel Swain, a climate scientist at UCLA. “Except the acceleration hasn’t ended yet.”

But for three days in July, it was the job of Incident Cmdr. Tom Lubas, 48, to try to outmaneuver the Carr Fire as it inched closer to his hometown of Redding, defying the multiagency effort to contain it.

The wildfire had begun in typical fashion — human error colliding with a dry landscape primed to burn. It hadn’t rained in the area since May and winter precipitation had

been 50 percent below normal. More than 17 other wildfires were already burning across the state, so resources to fight it were stretched.

On July 23, an older couple, driving home from vacation to tend to a family emergency, cut through Redding. A tire on their trailer went flat, leaving the wheel to drag on pavement near Whiskeytown Lake. Sparks flew into parched grass.

Lubas, a 23-year veteran of the California Department of Forestry and Fire Protection, knew most wildfires did their worst damage in the first hours after ignition, before firefighters dug in. Now, days later, the crews in Shasta County were well past that threshold. Lubas and his colleagues had set up a command center. Called in firefighters from all over. Carved containment lines.

But on Thursday, July 26, the fire exploded from 4,500 acres to more than 30,000, its footprint rippling outward in a rainbow of colors on Lubas' maps. Just after noon, he had handed off his incident commander role, becoming an operations section chief, and left base camp at the Shasta County fairgrounds in Redding.

It was supposed to be his day off, and he planned to shower and rest. From his truck window, though, he could see coastal winds stoking the blaze and smoke thickening.

He watched as a 30,000-foot-tall convection column — a plume filled with ash, debris and hydrocarbons — ballooned in the sky, condensing into fluffy pyrocumulus clouds. The column acted like the lid on a pot of boiling water. When you took it off, oxygen fed the fire, sucking up the hot air. That's what the column had done overnight: collapse, then blow flames in every direction, ripping through the county's rural oak woodland and knotted manzanita.

As Lubas drove, his truck registered the temperature outside: 113 degrees. On the coast, 150 miles west near Eureka, it was 59 degrees. Lubas was worried — and right to be. As the cool coastal air blew over Bully Choop Mountain and into the Sacramento Valley, the 54-degree difference caused warm air to shoot up in a vortex. The convection column would rotate faster and faster, contorting into a cyclone.

Sometime after 5:30 p.m., as Lubas finished grocery shopping, the sky grew dark. The fire's behavior alarmed him, so he went back to work, driving to the hills northwest of Redding to assist evacuating residents. But more than an hour later, at the intersection

of Keswick Dam and Quartz Hill roads near the Lake Keswick Estates neighborhood, he stopped. He was blocked.

Ahead of him, the tornado twisted. It was sinister and snake-like, a swirl of orange that seemed to fill the entire sky. Flames soared 400 feet in the air. It would grow to 1,000 feet wide, the length of three football fields, and produce temperatures double those of a typical wildfire. Its howling obliterated every other sound.

Lubas jumped out of his truck to record a video on his cell phone and was immediately blown onto his back. Goosebumps prickled his arms.

Holy shit, he thought, scrambling back into his truck. *Nobody is going to believe this.*



The Carr Fire tornado as seen from a Cal Fire helicopter.

5:45 p.m.

‘Get out of there!’

Across the Sacramento River, 5 miles west of Lubas, Don Ray Smith's radio crackled with the voice of his crew leader.

“Get out of there!”

Smith, 81, had been bulldozing contingency lines into the razorback ridges near the Buckeye Water Treatment Plant. It was treacherous work; dozers can tip and roll on such steep ground. The lines had been abandoned earlier in the day for this reason, but no one had told Smith.

He'd driven nearly four hours from his home in Pollock Pines in El Dorado County to help battle the blaze. Some thought he was too old for the work, but he wasn't the kind who took to retirement. As a private contractor, he'd operated heavy machinery for Cal Fire for more than a decade and had no plans of stopping.

As day turned to dusk, the tornado began to form. It wouldn't touch down for another hour, but it was rapidly gaining strength. Its black winds whipped faster, shaking Smith's bulldozer. It looked like a dust storm, but instead of soil and sand, smoke and embers raced through the air, pelting Smith.

Flames cut off the access road to the treatment plant, trapping him. Two firefighters chased him down the line, trying to reach him from behind, but it was too late. The blaze threatened to burn over him.

There was little else to do but try to create a small safety zone, a ring of bare dirt around his vehicle that he hoped would protect him. Through the smoke, four helicopters dropped water near his last known location. The pilots had to guess — they couldn't see the ground. It was so hot that one helicopter's temperature warning light flicked on, and, at 6:08 p.m., it was forced to land.

“I'm cut off by the fire,” Smith said over the radio, in his final dispatch. “I'm pushing down.”

7 p.m.

Escape to Keswick Dam

About 5 miles to the southwest, Patrick Hoffman, 29, steered a fire engine along rural roads to reunite with the rest of the strike team deployed to Redding by the Marin County Fire Department. It was his ninth fire season with the agency, and he was finally learning to supervise an engine.

Capt. Mark Burbank, 43, and two new seasonal firefighters were in the back as Hoffman drove south through the tiny community of Keswick. By then, flames shot across Iron Mountain Road, one of the two main routes through the Gold Rush town.

Hoffman had turned left on Keswick Dam Road, toward the Sacramento River, when everything went dark. The crew plunged into a void of black smoke. They were in the belly of what would become the tornado — but it hadn't started swirling yet. Embers glowed like stars. The lines on the road below disappeared. Then the gas pedal slackened, the engine robbed of the oxygen that fed the fire's combustion.

Flames flared ahead, and Hoffman reversed. Flames flared behind, and he accelerated. Back and forth he went, like a player in a high-stakes game of "Frogger." It was more than 200 degrees inside the engine's cab, so hot that the mapping system powered down. Painted letters, reading "Point Reyes," melted off the engine's side. So did their taillights. If the rig stalled ... Hoffman didn't want to think about it.

In the back seat, Burbank worked the radios. "We are in a bad spot," he messaged his battalion chief. "We are in a really bad spot."

Firefighters carry personal shelters as a tool of last resort. The Marin crew members knew they needed to deploy theirs now. Ahead, Burbank spotted a gate leading to a small field. He figured they could break out the thin foil blankets — which reflect heat while preserving a pocket of breathable air — and crawl under them, waiting out the storm.

"I'm going to check the gate," he said, opening the engine door.

Burbank walked 10 feet, maybe less. Radiant heat blasted his face. His protective yellow suit started smoking. His eyes watered.

Even if I make it to this gate, he thought, I won't make it back alive.

So he retreated to the engine. Hoffman then nosed the vehicle flush against a steep bank, a buffer from wind, flames and flying debris that threatened to shatter the windshield.

“Everyone grab your fire shelters and get ready to hold them against the windows!” Burbank shouted.

He thought of his wife, Yvonne, and their three young children. Firefighters had been dying over the summer; now he was going to be the next. But in that moment, the smoke shifted. Black faded to a caramel brown. A mirage? No, a break.

Hoffman gunned the vehicle down Keswick Dam Road, pausing for two of the men to snap a bolt on a gate, before parking in a gravel lot near the dam's power plant. The crew of four abandoned the engine and hiked to the edge of the river. It was 113 degrees, but the air outside the suffocating engine felt as crisp as a winter breeze. Burbank re-established radio contact, trying to hide his shaking hands.

“Head's up, Engine 1564 is taking refuge at Keswick Dam.”

As the Marin firefighters looked north, the flames swirled and converged as the blaze hopped the river. Ahead was Redding, population 90,000. The fire tornado was touching down.



7:15 p.m.

‘I’ll lead you out’

“Issue evacuation orders for the neighborhood of Sunset Terrace,” Shawn Raley barked over the radio to his branch commander, “all the way down to Eureka Way to Shasta High School.”

The sky was red and the wind screamed, shaking the leaves off trees. New fires lit in shrubs and on roofs.

People are going to get trapped, thought the Cal Fire captain, a 24-year veteran of wildland blazes. They are going to die.

He drove to the Land Park and Stanford Hills subdivisions tucked into the wooded hills east of Redding, figuring residents would need help escaping. His headlights barely pierced the smoke, but he could see black clouds whipping across the road. Three bulldozers inched past him on two-lane Buena Ventura Boulevard — one driven by Don Andrews, the others by contractors Terry Cummings and Jimmie Jones. They were under some electrical lines, which were swaying in the wind, and he shouted at them to move north, farther away.

Raley’s childhood was forged in fire. His parents worked as U.S. Forest Service firefighters and raised him in Mount Shasta in Siskiyou County. It seemed they were always rushing off in the middle of the night to battle a conflagration. Raley had worked on elite hotshot crews into the worst parts of blazes with little support, and he’d leaped from airplanes and rappelled from helicopters as a Forest Service smokejumper.

Stuff that scared everyone else gave Raley an adrenaline rush. Except snakes. They terrified him. He had seen nearly everything, including swirling eddies of air called fire whirls. But this — he hadn’t seen anything like this.

In the driveway of a sprawling house, Raley spotted an idling Tesla. Dr. Nanda Kumar, 62, had raced 5 miles home from Vibra Hospital of Northern California. His wife Yasoda, 58, and daughter Sushma, 29, were alone. They hadn’t received an evacuation alert, and when the power cut, their garage door wouldn’t open.



Video: As Shawn Raley helped evacuate residents from nearby subdivisions, footage from a camera on his dashboard captured his encounter with the Kumar family.

“My wife and daughter are there, can they come in?”
Kumar said, pointing to his vehicle.

“Go back!” Raley shouted at Kumar, sounding his siren. “You’re not —”

“My wife and daughter are there, can they come in?” Kumar said, pointing to his

vehicle.

“Come in my truck?” Raley asked. “Yes.”

The women, still in their pajamas, climbed into the back seat, coughing. Nearby, flames that climbed 100 feet devoured their neighbors’ homes. Soon, their home would fall as well. Trees bent nearly in half.

“I’ll lead you out,” Raley yelled to Kumar. “Take your car.”

Debris pelted the truck, cracking Raley’s windshield and shattering the others, as the wind blew the vehicle off the road. The captain threw himself across the passenger seat, shielding his face, as the fire passed over them. Yasoda and Sushma screamed.

“Are you OK?” Raley shouted, though he knew the answer.

He couldn’t hear his own voice over the tornado. He was embarrassed. What a weird emotion to feel at this moment, he thought. He’d told this trapped family he would get them out safely. Now they were covered in glass and bleeding. Behind them, the trunk of Kumar’s Tesla was aflame.

Raley never thought he would die on a fire line. But maybe this was it.



7:30 p.m.

The black rectangle

The radio call from Redding fire Inspector Jeremy “J.J.” Stoke couldn’t have been more urgent:

“Mayday!” he said.

The 37-year-old had cut short a family vacation in Oregon and Idaho with his wife and two children to come home and battle the Carr Fire. That night, he’d joined others in

evacuating residents from the Land Park neighborhood. As the tornado descended, he was about 250 feet northwest of Raley, driving his truck south on Buenaventura Boulevard. The ferocity of the thing defied his long experience.

“I need a water drop,” Stoke called out at 7:39 p.m. “I’m getting burned over.”

An engine captain responded immediately, asking for his location. There was no response.

The tornado picked up Stoke’s 5,000-pound Ford F-150 truck as if it was a toy car, flipping it repeatedly and dragging it down Buenaventura Boulevard. The truck scraped the pavement, leaving a trail of red paint, before coming to rest in the woods.

The twister destroyed everything around him, buckling an electrical tower into a jumble of steel, lofting a shipping container and blasting the bark off oak trees. Even after Stoke’s truck was towed, a black rectangle remained scorched on the ground. There, his friends and family would build a memorial covered in firefighting badges and Giants baseball caps.

For months, Stoke’s colleagues would search the area for his lost helmet. They never found it.



7:30 p.m.

Melody and the kids

Just south, on Quartz Hill Road, 70-year-old Melody Bledsoe soaked blankets in her kitchen sink and draped them over her great-grandchildren, Emily and James “Junior” Roberts, who were 4 and 5 years old.

Melody’s husband, Ed, was a handyman who’d gone just down the road to pick up a paycheck. The family hadn’t been ordered to evacuate, and Ed didn’t know the tornado

was headed their way — until he got a desperate, frightened call from Junior while he was stuck in gridlocked traffic.

“Are you coming?” the boy asked, his small voice frantic. The storm was sucking air through the house, rattling the windows, and ripping through the trees outside.

“Don’t worry, Grandpa is coming.”

“You gotta come in the front door, the back door is on fire,” Junior said. “I don’t want you to get hurt.”

“That’s where I’m coming. Be ready. You guys be ready. I’ll be there just as quick as I can. I’m waiting for the fire to pass.”

“Tell Grandpa I love him,” Melody Bledsoe said in the background, her voice barely audible.

“Everybody says they love you,” Junior said. “Come get us, Grandpa. There’s starting to be a lot of fire here.”

Then the call went silent.

7:45 p.m.

A text and a prayer

Three elements make fire: heat, oxygen and fuel.

So as the blaze spotted around bulldozer driver Terry Cummings in an open field near Buenaventura Boulevard, the 44-year-old attacked the wildfire’s base. He would choke off its fuel. Stop the flames from spreading. Two other dozer operators on contract with Cal Fire — Don Andrews and Jimmie Jones — worked alongside him. Raley was their boss.

Fire should have scared Cummings. The contractor grew up in the mountains in a logging and milling family. As a child, he would sit on his father's lap as he drove their bulldozer through the woods. But in 2005, his mother, sister and brother died in a house fire ignited by a candle, and soon after, he shut down the family business. He'd chased wildfires ever since.

Cummings had the rough look of a firefighter, but his hair was shiny and fell to his mid-back — his one vanity.



Video: From his bulldozer, Terry Cummings recorded a video on his cell phone of the oncoming flames.

“I was in some bad firestorms,” he texted his girlfriend, Shalli, at 8:04 p.m. “I love you.”

“I was in some bad firestorms,” he texted his girlfriend, Shalli, at 8:04 p.m. “I love you.”

The field around him was a sea of rippling orange, the embers and flames seemingly alive. He couldn't breathe from the smoke. He flagged down Andrews and Jones and led them back to Buenaventura Boulevard. He figured they could wait between the steep banks on either side of the road. The air would be clear, and the dozer engines could cool down.

But as they drove north, the tornado descended again, its edges glowing red. It whipped rocks into Cummings' windshield like bullets, shattering the glass. It was as dark as midnight. Then it picked up the front of his 25-ton bulldozer, pivoting it clockwise and dropping it on the hood of a nearby truck, which was crushed and aflame.

The driver must be dead, Cummings thought.

He reached for the fire shelter tucked behind his seat, but nabbed his gear bag by accident. He held it in front of his face to protect his airways. White blisters bubbled on his fingertips. His skin felt like it was melting. He screamed in pain.

"No Lord," he screamed. "Not like this!"

Now, it seemed, he was going to die the way his family had. The tornado sucked Cummings halfway out the shattered window, his body drawn by a gravity he didn't understand. He gripped the window frame. Jagged glass pierced his left leg as he pulled himself back inside.

Reaching up, he tried to unfold the fire curtains over his dozer's open windows. But the third-degree burns on his fingers prevented him from undoing the clasps. He grabbed a knife and cut them. Finally reaching his fire shelter, he pulled its cord as best he could.

"Be calm. Don't make mistakes," he repeated to himself. "Be calm. Don't make mistakes."

For a moment, the wind stopped.

8 p.m.

Into the blade

Minutes later, the tornado raced down Buena Ventura Boulevard again. Even now, much about the storm remains unknown. Several fire tornadoes could have occurred. Or maybe it was one, weakening and then again gathering strength. Those who witnessed it say it appeared to wane several times, only to be recharged.

In a final Cal Fire report, there is no consensus. What scientists know is this: Wind follows the terrain, and, as the twister headed uphill, it slowed. Then it probably fell backward, attacking the same area again.

At that moment, the particulars didn't matter much to Steve Bustillos, 55, as he cringed in the driver's seat of his truck — the one that sat mangled and flaming under Terry Cummings' dozer. The air quivered and warped from the heat, like the horizon of an asphalt highway on a hot day.

A retired San Jose police officer, Bustillos lived in the Stanford Hills subdivision. He hadn't evacuated in time because he didn't know he needed to. The fire had moved that quickly. As he drove out of the gated neighborhood just after 8 p.m., he called his wife, who was receiving treatment in the Bay Area for endometrial and lung cancer, both stage 4.

"It might be over," he told her. "The fire is here."

Now he was in grave trouble. The fire spreading in his pickup fed off spilled diesel, torching paperwork, jewelry and guns in the back seat. Bustillos' hair looked like someone had taken a blowtorch to it. He knew he couldn't stay put.

So he climbed outside, grabbing a suitcase filled with clothing, and made a desperate move, crouching in the blade of Cummings' bulldozer, which provided some protection from the wind. He held the luggage in front of him. Fifteen seconds passed, or possibly 15 minutes. He wasn't sure.

Embers floated through the air as the wind shifted. Fire danced through the grass and in the trees. Then the temperature dropped, perhaps by as much as 50 degrees. Bustillos saw Cummings sprinting down the street under his semi-deployed fire shelter.

“Get me out of here!” Cummings yelled at a man driving a Cal Fire truck, his voice cracking. “I am burned really bad.”

Bustillos hopped into a second truck. Then he saw the driver’s face. He knew that expression from decades in law enforcement — the look when someone wearing a uniform, which meant they were supposed to keep people safe, knew that might not be possible.

“I saw it in them,” he said. “These guys were scared.”



8:15 p.m.

‘Where is Don?’

The tornado had jumped a river, blasted across fields, leveled neighborhoods and rendered the landscape smooth and alien. Now it was dissipating, finally. But as it withdrew back into the sky, few knew that.

Firefighters and police officers and residents, gripped by fear, were rushing to escape what they supposed was an inevitable death. In the chaos, Don Andrews was left behind. Alive — at least for now, he thought.

Again, the dozer operator reached for his cell phone. He called his son.

“Tell my wife I love her,” he said. “Please. Take care of her.”

Down the hill, now near the intersection of Nash and Keswick Dam roads, Cmdr. Lubas watched people stream out of hillside neighborhoods. Their stares were vacant, like

those of soldiers returning from battle. They'd survived the worst of a fire that killed eight people — including Don Ray Smith, Jeremy Stoke, Melody Bledsoe and her great-grandchildren — and ruined more than 1,000 homes over 38 days.

“They couldn't comprehend what was going on,” Lubas said later. “I have been doing this for 23 fire seasons, and I have never seen anything remotely close to that tornado.”

Lubas helped spray down the back of Dr. Kumar's Tesla, which was still flaming. He directed their savior, Capt. Raley, to set up a triage area for burn victims, and ordered five ambulances. Then he left to continue evacuating more residents along Lake Boulevard. More people flooded the intersection.

Andrews still wasn't among them.

“Where is Don?” his colleague, Mike Merdock, kept asking. “Why did no one get Don?”

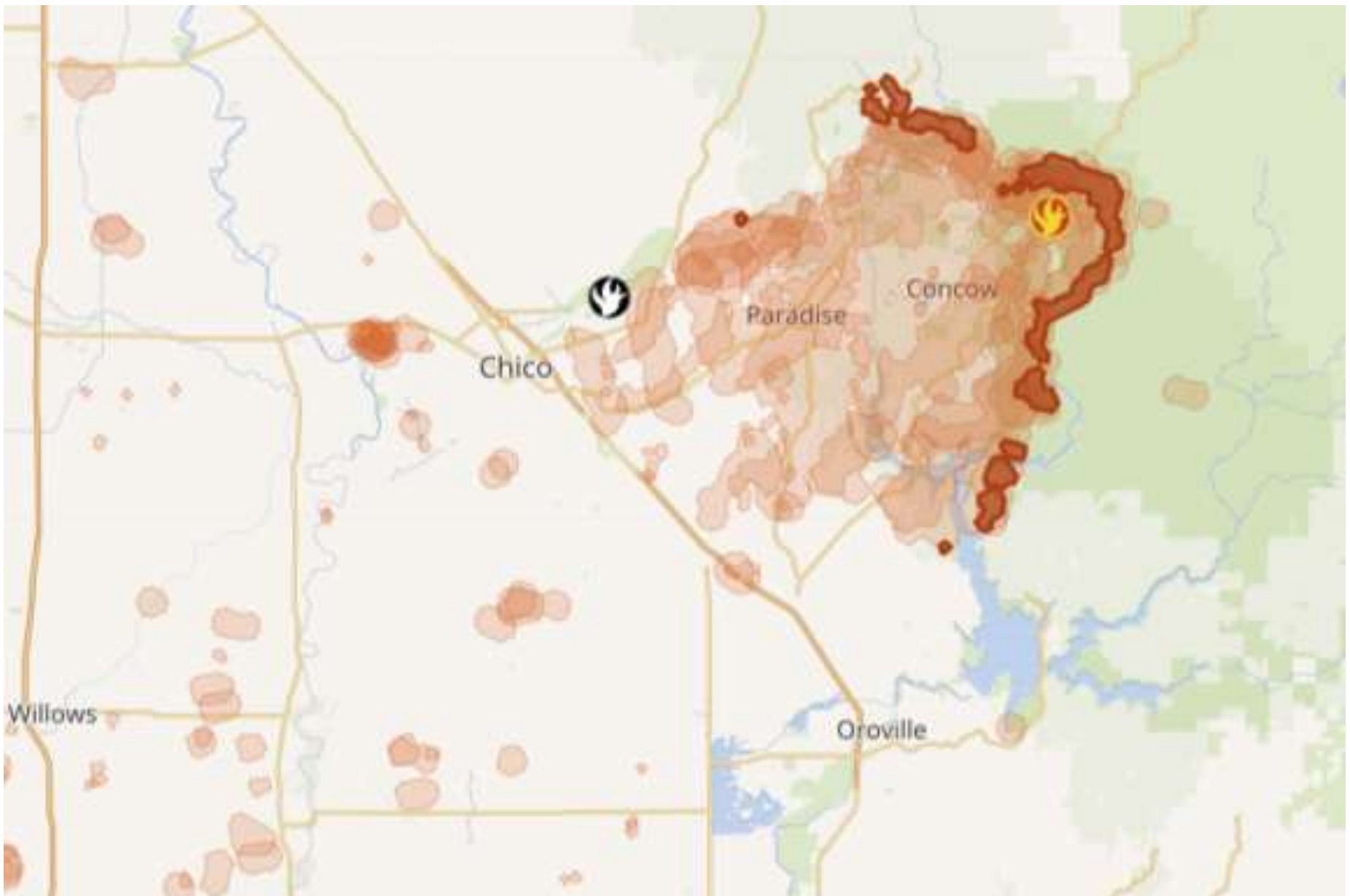
Eventually, Merdock was able to drive up Buena Ventura Boulevard, past California Highway Patrol officers who had blocked off the street, and find the bulldozer. He figured Andrews was dead, that he couldn't possibly have survived. But as he grabbed the back of the contractor's shirt to haul him out of his vehicle, Andrews twitched.

Together, they drove out of the decimated neighborhood, Andrews thinking one thought: *How did anyone live through this?*

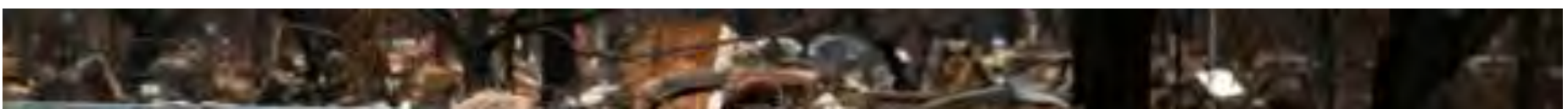
All that was left, for as far as he could see, was ash.



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OPINION

Just say no to more Southern California sprawl

By THE TIMES EDITORIAL BOARD
DEC 08, 2018 | 3:10 AM



Tejon Ranch, where Centennial, a new master planned community, could bring in up to 19,333 residences. (Los Angeles Times)

On Tuesday, the Los Angeles County Board of Supervisors will decide whether to green-light the controversial Centennial development, a 19,000-home mini-city to be built at Tejon Ranch in a remote valley off the Grapevine.

It is a pivotal, once-in-a-generation decision for the supervisors: Will they continue the old model of growth — in which subdivisions are allowed to go up in remote wilderness areas, often in high-risk fire zones, far from established job centers, requiring residents to drive long distances and creating more traffic and greenhouse gas emissions?



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Or will the supervisors finally put a stop to sprawling, distant, risky development and instead send a message that Southern California is committed to growing in an environmentally sustainable way.

There's really only one responsible choice: Say no to continued sprawl.

Not that it's an easy decision. California has a debilitating housing shortage that is driving up rents and home prices, fueling an increase in homelessness and handicapping efforts to attract and retain businesses. Los Angeles County has failed to build enough housing to meet population demands and now has a deficit of 1 million homes. So, yes, the region needs to build a lot more housing. But it must be careful as it does so.

California continues to approve sprawling developments and people are driving more, not less.

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The Centennial development has been in the works for nearly two decades. Plans call for a community of 57,000 people in the mountains between Los Angeles and Bakersfield.

The property is currently open space of grasslands and rolling hills — a stretch of land that's at "high" (or "very high") risk of wildfires, according to the California Department of Forestry and Fire Protection. Between 1964 and 2015, state fire officials recorded 31 wildfires larger than 100 acres within five miles of Centennial, including four within the project's boundaries. The vast majority of wildfires are caused by humans, including sparks from vehicles and power lines, so developing in wildland areas only increases the risk of fires and puts more people in harm's way.

The developer and L.A. County officials say Centennial would be made as fireproof

as possible, using fire-resistant building materials and landscaping, and with power lines buried underground and multiple fire stations for fast response. Yet, even modern construction is no guarantee of safety. In 2017, brand-new homes in Ventura built to the state's most current standards were destroyed by the Thomas fire.

The deadly fires in Paradise, Malibu, Redding and Santa Rosa have shown the tremendous danger of putting homes in the middle of high fire-risk areas in California. The threat is only going to grow as climate change fuels more frequent, more destructive fires.

And speaking of climate change, remote developments also help generate the greenhouse gases responsible for it. That's because people who move to far-flung subdivisions for more affordable houses generally have to commute longer distances to their jobs, and the developments themselves are often built for driving, rather than walking, biking or transit.

The developers and county planners say the Centennial project would be different, with a network of villages designed to be walkable and bikeable. The developer has said Centennial would be a "self-sustaining community," with an equal number of homes and jobs so that residents don't have to commute to urban areas for work.

That's a nice idea, but it's liable to prove awfully difficult to accomplish. In Santa Clarita, 75% of residents commute out of the city for work, and the percentages are similar for Lancaster and Irvine, according to the Southern California Assn. of Governments. And unlike other suburban communities, Centennial would not be near any commuter rail lines.

The Centennial development cuts against the state's ambitious sustainability laws and strategies. A decade ago, the state passed a landmark law designed to cut greenhouse gases by requiring regions to plan and design housing and transportation projects so that people wouldn't have to drive as much.

Again, nice idea. But a recent report found the law has largely been ignored. California continues to approve sprawling developments and people are driving more, not less. The transportation sector is the state's largest source of greenhouse gases, and emissions have risen despite the arrival of electric cars and vehicles that burn less fuel per mile.

Time's running out — last week yet another study reported that greenhouse gas emissions worldwide are growing at a faster pace, making it much harder to prevent the most severe effects of climate change, including severe storms, wildfires, food shortages, heat waves, droughts and floods.

[Enter the Fray: First takes on the news of the minute from L.A. Times Opinion »](#)

Why do we accept business as usual when radical change is needed? Why do we keep building houses in the path of wildfires, only to act surprised when flames force people to run for their lives? Why do we keep building homes in remote areas and then wonder why people drive so much?

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Why do elected leaders ignore their own "visions" for a new way forward? Los Angeles County is a member of the Southern California Assn. of Governments. In 2016, the agency adopted a "Sustainable Communities Strategy," which laid out the options pretty clearly:

“We can choose to build new sprawling communities that pave over undeveloped natural lands, necessitating the construction of new roads and highways — which will undoubtedly become quickly overcrowded and contribute to regional air pollution and ever increasing greenhouse gas emissions that affect climate change.

“Or, we can grow in more compact communities in existing urban areas, providing neighborhoods with efficient and plentiful public transit, abundant and safe opportunities to walk, bike and pursue other forms of active transportation, and preserving more of the region’s remaining natural lands for people to enjoy.”

So, county leaders, which is it going to be?



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Paradise, Ca 'Camp' fire FLYOVER

As fire traps 150, 'are we gonna die?'



FLAMES from the Camp fire engulf Paradise, Calif. Some residents had to wait it out in a parking lot. (Peter Dasilva EPA/Shutterstock)

By Rong-Gong Lin II and Maria L. La Ganga

PARADISE, Calif. — It was the best bad place.

To the south was a gun shop called Fins, Fur & Feather Sports, stocked with live ammunition. To the northeast, a propane yard. Across the street, a Fastrip gas station. All around, soaring, drought-crisp pines.

And in the center? About 150 terrified people who had fled the ferocious Camp fire only to be stopped at the intersection of Skyway and Clark Road, forced to sit out

the deadliest conflagration in California history.

In a parking lot. Surrounded by fuel. Barred from escape by roaring flames and roads that were choked, first with traffic, then abandoned vehicles, and, finally, with burned-out hulks of charred metal.

“Are we gonna die?” volunteer firefighter Chris Rainey was asked, over and over again. His job that day was to keep the panicky crowd as calm as possible. His response each and every time: “No, you’re not gonna die.”

Despite its obvious downsides, he told them, the parking lot was the safest place to be on Nov. 8 as flames raced through Paradise with astonishing speed, taking authorities and residents by surprise, snarling roads with evacuees and killing at least 88 people.

A complicated series of small decisions made by firefighters, law enforcement personnel, volunteers and evacuees themselves saved the people in the parking lot and hundreds of others — men, women and children who could not leave their burning neighborhoods and had to do what no one wants to do in a disaster.

Wait.

Calin Moldovan, an engineer with the California Department of Forestry and Fire Protection, had just started an 11-day vacation at his home in a Sacramento suburb when he awoke to a text message from his captain in Magalia, population 11,000 or so, tucked on a ridge in the Sierra Nevada north of Paradise.

The message bore a single image: a giant, billowing column of smoke.

How bad? Moldovan texted back.

Bad.

So Moldovan, 34, hopped into his Ford Fusion hybrid, raced through the Sacramento Valley and into the Sierra Nevada foothills, tailing fire engines up the mountain on Clark Road, as residents fled in the opposite direction.

When he arrived in Paradise, the winds were so strong that smoke could no longer billow up. Instead, it moved side to side, shrouding the town in a cloud so dark the sun was blotted out. It was 10:30 a.m.

Moldovan whipped out his smartphone to document the otherworldly experience.

An hour later, the crush of cars at Skyway and Clark came to a standstill. The

normally bustling Y-shaped intersection joins two of the main ways out of the town's northern tip.

On this morning, there was only silence — dozens of people waiting for cars to move. Flames were sheeting across the road, he said. The fire's main flank approached from the east. Showers of embers ignited homes to the west.

The fire "basically became a noose that began to shrink," Moldovan said.

That's when he and several law enforcement officers made one of many decisions that would ultimately help save more than 100 lives.

The intersection was home to a new strip mall. Its parking lot was freshly poured concrete. Two metal-roofed buildings were under construction. At its edge was Optimo lounge, a nightspot known for live music, karaoke and Chinese food.

The sloping landscape embraced the mall, creating a kind of bowl shape. The fierce winds shot over the bowl, which kept burning embers mostly at bay.

"It doesn't mean this was the safest place in the whole entire Paradise ridge," said Moldovan, the first full-time firefighter on the scene. "It just means that it was the safest place that we had access to at the time."

As the fire transformed trees into torches, Moldovan and the law enforcement officers shepherded evacuees out of cars and onto the concrete lot. Volunteers helped people in wheelchairs trundle over curbs. Others served as lookouts, monitoring flames that neared the strip mall's buildings and threatened the panicked crowd.

"Dogs, cats and pets. People bringing suitcases," Moldovan recalled. "People crying, people reverting in the fetal position and sleeping on the curb."

Only one thing will persuade someone who is stuck in a car near a propane yard as wind-whipped embers sail by to leave what seems like certain shelter for an open parking lot.

Brutal honesty.

Or as Butte County Sheriff's Det. Jim Beller told holdouts on that terrible Thursday, "Look, if you don't get out of your car, you're going to die. You need to have a building between you and the propane company."

Beller persuaded one elderly man to escort his ailing wife away from the gridlock to the lot's relative safety. But the man came back. He'd forgotten his wife's

medication.

Will she die without it? Beller asked. She might, the man responded.

"If she dies, I'm not going to be able to live with myself," Beller thought. "If he goes to the car and dies, I'm not going to be able to live with myself. If I go to the car and get the medication and I die, I won't know it."

It was one more bad choice in a day filled with them.

Beller made his way carefully to the couple's car. He could hear the moan of gas from overheated propane tanks. He grabbed the medicine and ran back to the parking lot.

That's when a firefighter yelled at the top of his lungs to the crowd at Skyway and Clark that if they heard explosions they should not run. The last thing they needed was mass panic.

"It sounded like war," Beller said. "I was scared to death, but I was trying not to show it. Because they were all staring at us the whole time."

There was no water at Skyway and Clark.

The fire hydrants had all gone dry. Flames had consumed thousands of structures, exposing pipes and letting precious water drain away uselessly. The result was no water pressure anywhere in town.

Fire engines, which carry 500 gallons, had yet to reach the evacuees in their perilous redoubt, as the blaze raced ever closer.

Moldovan got on his radio. They needed air drops and engines and anything that could keep them safe until they were able to leave the scorched ridge.

Finally, the first fire engine roared up Skyway, punching its way through a string of abandoned cars, opening an escape route. Firefighters on board told members of the group that, if they moved fast, the engine could escort 10 cars south at a time.

Moldovan told dozens of people to prepare for a swift departure.

Ten minutes later, the first caravan was ready. Optimism soared.

Then a second fire engine plowed up the hill. Its sides were scorched by flames.

The message its occupants carried was grim: "Do not send anyone down," a firefighter said, "because it will kill whoever we send in there."

Not that the strip-mall-turned-temporary-refuge was all that much safer.

David Demaree watched it for hours from the vantage point of his truck, which he had parked at Skyway and Clark and repositioned as the flames moved.

The 60-year-old thought about joining the evacuees who found shelter in the parking lot. But he couldn't juggle the cat carrier with Gatsby and Willow inside, while leading Fayla, his border collie-husky mix, and dragging two backpacks filled with memories: DVDs of his kids' early Christmases, his grandfather's 1919 Georgetown University yearbook.

As the fire closed in on the evacuees, he sometimes wondered if he'd make it out, if he'd ever see his wife, Kathy, again. "I was ready at one point to drive through fire if I had to," he said. "I was shook up. But you have to kind of keep yourself calm."

So he stayed. And he watched.

Flying embers ignited a spot fire in the frontyard of a house directly across Skyway from the Optimo parking lot. Firefighters on site caught it early and extinguished it with hand tools. But as the flames roared from east to west, ever closer, the house itself caught on fire.

The engines were gone. They'd left to help clear roads. There was nothing anyone could do.

"One woman was standing on the side of the road, sobbing," said Paradise police Sgt. Rob Nichols. "We asked her to move. We didn't want her to get hurt.

"It was her house burning."

Sarah Drummond could feel the heat blasting off the burning home. The air was thick with smoke. People were coughing. The scene was "really intense and gloomy," she said. "The looks on people's faces, it was a saddening feeling in the whole area."

Drummond is 19, a dietary aide at a nursing home called Cypress Meadows Post-Acute. Buses that should have helped evacuate the facility were not allowed into the fire zone, so the patients were loaded into staff members' cars.

A man in his 80s with dementia ended up in the back seat of Drummond's gray Ford Focus hatchback. In the front passenger seat was a woman in her late 60s, wearing a hospital gown and a diaper and hooked to an oxygen tank.

They left Cypress Meadows. And then, gridlock. Drummond flagged down a police

officer to help her get the patients to the Optimo parking lot. They'd driven less than a mile. But the road was choked with abandoned cars. The cruiser couldn't get anywhere close. Neither patient could walk.

"The old woman was in a lot of pain," Drummond said. "Her diaper was leaking on my passenger seat. We got her out of the car ... She was saying, 'Ow!' And crying. I told the cops, you have to go easy on her ... They got the little old man out."

The patients were loaded into the police car, but it didn't have seats, Drummond said, and the officer was driving "chaotically" to get them around barriers as the fire bore down.

"The little old residents were flopping around," she said. "I was holding each of their hands so they wouldn't hit their heads. We got to the parking lot. We sat the old woman on a bucket."

Her first words on getting to safety at Skyway and Clark: "When are we going to eat? I need a sandwich."

She was diabetic and needed food to stabilize her blood sugar level. Nichols and Drummond walked through the crowd asking for food. Someone gave them cookies, a blanket and a Raiders ball cap to keep the old man's head warm.

Then the house across the street ignited. Fire officials made yet another life-saving decision. They smashed a big pane of glass at the coffee shop under construction and shepherded the evacuees in.

From inside the shop on the parking lot's edge, Drummond could feel the fire's heat. She began to cry. "What if we don't make it out of here?" she wondered. "What if we end up getting stuck in this thing, this coffee shop, and it caught on fire?"

But as the flames drew nearer, her panic subsided. The firefighters knew what they were doing, she figured. They were all going to be OK.

"I had a little string of faith in me," she said.

Moldovan and Cal Fire Capt. Sean Norman, who ordered the break-in at Skyway and Clark, figured the strip mall's two unfinished buildings could tolerate heat for 30 minutes to an hour before they started to burn.

If the coffee shop ignited with evacuees inside, the men reasoned, the people could be moved to a different building. If that caught fire, everyone could head to the

center of the parking lot again and huddle tightly together.

It was the kind of bet being made in pockets throughout Paradise. Some people waited out the fire in houses, others in parking lots where they prayed the asphalt expanses could keep the flames at bay.

Norman was well aware of the danger. While driving toward the Optimo parking lot earlier in the day, he passed a car that had rolled and was engulfed in flames. A body was later found inside. He saw motorists abandoning burning cars and running toward a nearby Walgreens.

Embers were catching in people's hair, lighting it afire. Evacuees ran past, badly burned, crying out for help.

"Just keep going to the Walgreens," Norman had shouted. "There's firefighters waiting down there for you."

Norman told firefighters to break into the drugstore. Somewhere between 60 and 80 evacuees poured inside. Two fire engines were stationed to defend the building.

His order to the firefighters: "Whatever you do, don't let this building catch on fire."

The flames hit Walgreens hard from two different directions. It had already torched homes and a gas station. Shopping carts, wooden pallets and shrubbery ignited.

Abandoned vehicles blazed. Burning pine needles blew in the wind. Firefighters poured precious water on the Walgreens roof. Embers showered down. To Norman, it was an "urban firestorm."

Walgreens held, thanks to its concrete-block construction and the firefighters' efforts.

So did the parking lot at Skyway and Clark. As embers ignited a pine tree between the gun store and the coffee shop, fire engines finally returned.

They hosed down the tree. They sprayed water on Optimo, then stopped. They needed to save the scarce resource and focus on the gas station. Bulldozers cleared the road.

The parking lot's weary inhabitants were finally able to drive off by late afternoon. Drummond and the nursing home residents made it to safety. Demaree was reunited with his wife. Their house was destroyed.

As the last evacuees left, Optimo burned.

Rainey, the volunteer firefighter, was one of the last to go. It was a good decision to get the people out before night fell, he said, even though they had to drive through flames to get to safety.

It was 6 p.m. Night had fallen. Firetrucks were making their way up the hill. Reinforcements, he thought, finally.

It was a sight to see.

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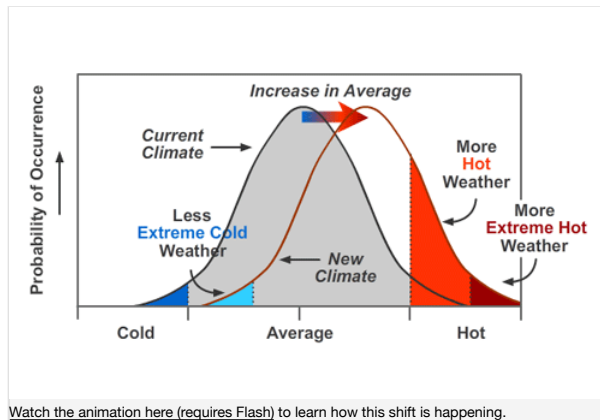
Climate Change Understanding the Link Between Climate Change and Extreme Weather

Changes in Extreme Weather and Climate Events

Scientists study many aspects of change in extreme weather and climate events. These include:

- **Frequency:** Are events occurring more often than they did in the past?
- **Intensity:** Are events getting more severe, with the potential for more damaging effects?
- **Duration:** Are events lasting longer than "the norm"?
- **Timing:** Are events occurring earlier or later in the season or the year than they used to?

Extreme weather is typically rare. But climate change is increasing the odds of more extreme weather events taking place.



Watch the animation here (requires Flash) to learn how this shift is happening.

Establishing the most likely causes behind an extreme weather event can be challenging, since these events are due to combinations of multiple factors, including natural variability. Nevertheless, scientists have been able to draw a connection between some types of extreme climate patterns—an even some individual events—and climate change. A good way to think about this connection is to focus on whether an extreme weather event was made more likely by climate change.

There have been changes in some types of extreme weather events in the United States over the last several decades, including more intense and frequent heat waves, less frequent and intense cold waves, and regional changes in floods, droughts, and wildfires.^[1] This rise in extreme weather events fits a pattern you can expect with a warming planet. Scientists project that climate change will make some of these extreme weather events more likely to occur and/or more likely to be severe.

Learn more by clicking on each photo below:

Extreme weather and climate events are:

- Events that typically don't happen very frequently, such as droughts or floods that have historically occurred on average only once in 100 years.
- Events that vary from "the norm" in severity or duration, like heat waves.
- Events whose impacts are severe, like hurricanes.

Key Points

- Extreme weather events are becoming more frequent and/or severe around the world. This is consistent with what we expect with a warming planet.
- Increasingly frequent and/or severe weather events have serious consequences for society and ecosystems.
- Between 2011 and 2013, the United States experienced 32 weather events that each caused at least one billion dollars in damages.
- Changes in some weather events are more closely linked to climate change than others.
- Understanding the links between climate change and extreme events can help us plan for the future.

Related Links

- EPA's [Natural Disasters](#) page
- Online course: [Extreme Weather 101](#)
[EXIT Disclaimer](#)
- Blog: [Heat Waves and Climate Change](#)
- Blog: [When It Rains, It Pours: The Climate Link Between Extreme Precipitation and Drought](#)
- Blog: [Resiliency in The Face Of Stronger Storms](#)

Heat Waves

- **Why does it matter?** Heat waves can have serious health consequences, particularly for older adults, young children, the poor, and people with certain pre-existing health conditions, like asthma or heart disease.^[1] Excessive heat can also kill or injure crops and livestock, and it can lead to power outages as heavy demand for air conditioning strains the power grid.
- **How does it relate to climate change?** Even a small rise in average temperature brought on by climate change can boost the odds of extreme heat and heat waves.
- **What's happening?** Climate change has increased the likelihood of more frequent and more severe heat waves. Heat waves have generally become more frequent and intense across the United States in recent decades, particularly in the western United States (including Alaska).^[1] The impacts of heat waves are greatest in the Northeast and Midwest,^[2] and in urban areas, where the urban heat island effect increases vulnerability to heat-related health impacts.
- **What's ahead?** Heat waves are expected to become more frequent, longer, and more intense in the years ahead.^[2] The number of extremely hot days is projected increase throughout the United States.^[1]
- **How sure is the science?** Scientists are *highly confident*^[2] that heat waves and other extreme heat events have and will continue to become more frequent and intense due to climate change.

Droughts

- **Why does it matter?** Droughts can mean crop and livestock failures for farmers, which in turn can cause higher food prices and possibly even food shortages. Droughts can also stress water supplies and contribute to wildfires.
- **How does it relate to climate change?** As temperatures rise because of climate change, more water evaporates from land and water bodies. Along with changes in precipitation patterns, this can contribute to unusual dryness in some areas.
- **What's happening?** In recent decades, some regions have experienced more intense and longer droughts, while other regions have seen less frequent, less intense, or shorter droughts.^[1] There has been no general trend in the overall extent of drought across the contiguous United States since 1900.^[1] However, large portions of the Southwest have experienced drought conditions since weekly Drought Monitor records began in 2000.^[1] Droughts are expected to be a normal condition for the southern and central United States in the next century.^[1]
- **What's ahead?** Summer droughts are expected to intensify almost everywhere in the continental United States due to longer periods of dry weather and more extreme heat. A number of studies project that widespread drought will become more common over much of the southern and central United States, with amplified drought severity. A reduction in soil moisture, which exacerbates heat waves, is projected for much of the western and central United States.^[1]
- **How sure is the science?** Scientists are *highly confident*^[1] that droughts have become more frequent and intense in some regions of the United States, and that climate change increases the likelihood of these severe droughts in the future, particularly in the Southwest. Factors such as changes in a region's land use or high draws on water supplies can also play a role, especially at the local level.

Wildfires

- **Why does it matter?** Wildfires and their associated air pollution can cause deaths, injuries, and eye, respiratory, and cardiovascular illnesses. Large wildfires can disrupt or displace communities and have significant economic costs related to fire suppression, property damage, and losses in recreation, tourism, forestry, and related industries. They can also threaten wildlife and degrade local ecosystems.
- **How does it relate to climate change?** Climate change can contribute to dry conditions through higher temperatures, increased rates of evaporation, and earlier spring snowmelt (resulting in longer dry seasons), which all increase the risk of wildfires.
- **What's happening?** In recent decades, the extent of wildfires appears to have increased, particularly in the western United States.^[1,2] Increased warming, drought, and insect outbreaks, all caused by or linked to climate change, have increased wildfires and impacts to people and ecosystems in the Southwest.^[1]
- **What's ahead?** There is *very high confidence*^[1] that under projected climate change, forests and communities in the western United States will be increasingly affected by more frequent, larger, and more intense wildfires.
- **How sure is the science?** Scientists are *highly confident*^[1] that wildfires have increased in size in the western United States and *very highly confident*^[1] that dry conditions associated with climate change increase the likelihood of large wildfires in the future. Other factors, such as land management, land use changes, and impacts of pests, can also play a role in forest vulnerability.

Extreme Rainfall

- **Why does it matter?** Extreme rainfall events can damage crops, erode soil, and increase flooding. In addition, runoff from precipitation can degrade or contaminate water quality as pollutants deposited on land wash into water bodies used by people for drinking, irrigation, and other activities.
- **How does it relate to climate change?** Warmer temperatures cause more water to evaporate into the air. This moisture-laden air can produce more intense precipitation in the form of extreme rainfall events and storms.
- **What's happening?** In recent years, a larger percentage of precipitation has come in the form of intense single-day events.^[4] The amount of rain falling on the heaviest rain days has also increased over the past few decades.^[1]
- **What's ahead?** It is likely that the frequency and intensity of extreme precipitation events will increase over most of the United States and many other areas of the globe.^[4] A trend towards increase heavy precipitation will continue to occur, even in areas where total precipitation is projected to decrease.^[1]
- **How sure is the science?** Scientists are *highly confident*^[1] that across most of the United States, the heaviest rainfall events have become more intense and frequent, especially in the Midwest and Northeast, and that the frequency and intensity of extreme rainfall events will further increase in the future for most areas in the United States. Other factors, such as weather systems and ocean cycles like El Niño, can also play a role.

Extreme Winter Precipitation

- **Why does it matter?** Heavy winter storms can disrupt transportation, the flow of goods, and emergency and medical services. A buildup of snow can collapse roofs, knock down trees and power lines, and cause flooding when it melts.
- **How does it relate to climate change?** Warmer temperatures cause more water to evaporate into the air. If the temperature is still below freezing, this moisture-laden air can produce more intense precipitation in the form of unusually heavy snow, sleet, and freezing rain events, even in years when total snowfall is lower than average.
- **What's happening?** Winter storms have increased in frequency and intensity since the 1950s, and their tracks have shifted northward over the United States.^[1]
- **What's ahead?** It is likely that the frequency and intensity of extreme winter precipitation events will increase in some areas of the United States, particularly in the northern states.^[1]
- **How sure is the science?** Scientists have *medium confidence*^[1] that winter storms have increased slightly in frequency and intensity.

Hurricanes

- **Why does it matter?** Powerful hurricanes that make landfall can cause significant numbers of deaths and injuries, and disrupt or displace communities. When combined with coastal waters made higher by sea level rise, strong winds can create damaging storm surges. Hurricanes are also among the most costly extreme weather events, with severe storms causing billions of dollars in economic losses.^[6,7] Even hurricanes that don't make landfall can influence waves, currents, and storm tides, which can result in property damage, flooding, and coastal erosion.
- **How does it relate to climate change?** Increases in hurricane activity are linked to warming ocean temperatures because hurricanes draw more energy from warmer water. But the link between ocean temperature and hurricanes is complex, and other factors can also play a role in the formation and intensity of these storms.^[8]
- **What's happening?** There has been an increase in the intensity, frequency, and duration of hurricanes and in the number of strong (Category 4 and 5) hurricanes in the North Atlantic Ocean since the early 1980s.^[1] However, changes in observation methods over time make it difficult to know for certain whether tropical storm activity has shown a long-term increase.^[8]
- **What's ahead?** The intensity of the strongest hurricanes is projected to continue to increase as the oceans continue to warm, bringing stronger winds and heavier rains. Whether changes in hurricane frequency or landfall will occur is less certain.^[1]
- **How sure is the science?** Scientists have *medium confidence*^[1] that hurricane intensity and associated heavy rainfall will continue to increase under a changing climate, but significant uncertainties remain.

Tornadoes

- **Why does it matter?** Strong tornadoes can cause deaths and injuries, disrupt or displace communities, and inflict severe damage to crops, trees, buildings, and infrastructure.
- **How does it relate to climate change?** A warming climate can lead to stronger and more frequent thunderstorms, and these storms can spur tornadoes.^[9] But scientists do not yet fully understand all of the ways in which tornadoes may be linked to climate change.
- **What's happening?** Although the number of tornado reports has increased with better observation practices, there has been little change in the frequency of the strongest tornadoes over the past 55 years in the United States.^[10]
- **What's ahead?** With a warming climate, the thunderstorms and weather conditions that give rise to tornadoes could increase in some areas. But challenges in observing and modeling these events result in many uncertainties about how the frequency and intensity of tornadoes will change.^[1,10]
- **How sure is the science?** Scientists have *low confidence*^[1] in projections of trends in severe storms, including the intensity and frequency of tornadoes, hail, and damaging thunderstorm winds. This is in part due to a lack of long-term and the fact that such small and often remote storms are difficult to monitor and model.

Floods

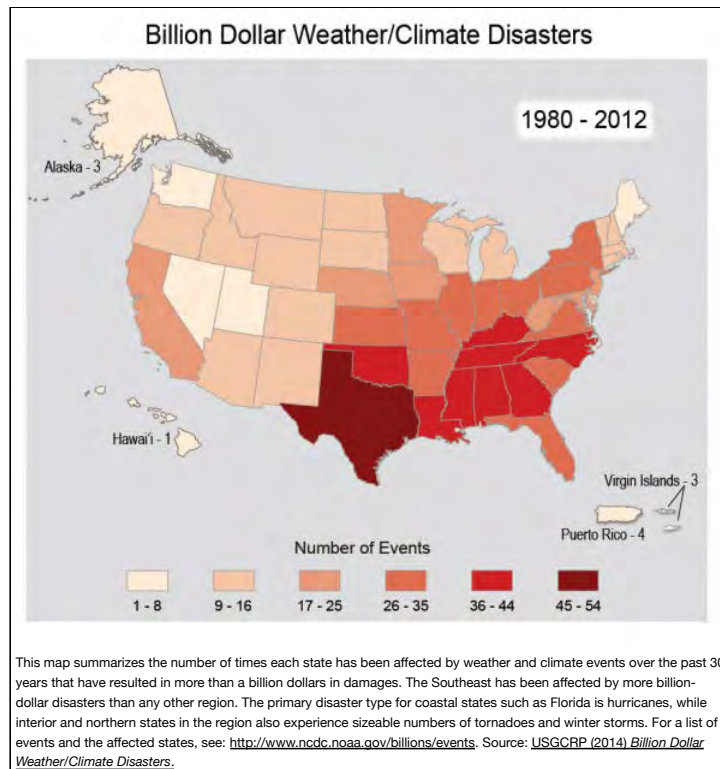
- **Why does it matter?** Flooding can cause disease, deaths, and injuries; damage property and critical infrastructure such as sewer systems and wastewater treatment facilities; and disrupt or displace communities.
- **How does it relate to climate change?** Heavy rainfall events, more intense storms, and changes in the timing of snowmelt can lead to more frequent or intense flooding in some areas.^[11]
- **What's happening?** Many regions of the United States are experiencing significant changes in the magnitude of river flooding. When averaged over the entire nation, however, the increases and decreases cancel each other out and show no national level trend. For instance, there has been an increase in flooding events in the Midwest, Great Plains, and Northeast in the last several decades, where the largest increases in heavy rain amounts have occurred. But flooding has decreased in the Southwest.^[1]
- **What's ahead?** Heavy rainfall events and more intense storms in some regions could lead to more frequent or intense flooding in many United States regions, even in areas where total precipitation is projected to decline.^[1] There is *medium confidence*^[10] that projected increases in heavy rainfall would contribute to increases in local flooding in some regions.
- **How sure is the science?** The link between floods and climate change is a relatively new area of research, and many other factors, like land use and management practices, can trigger these events or influence how damaging they become. Scientists have *high confidence*^[1] that there have been regional trends in floods. However, scientists have *low confidence*^[10,1] in projections of future changes in flood frequency and intensity, because the causes of regional changes are complex.

CONFIDENCE LEVEL			
Very High	High	Medium	Low
Strong evidence (established theory, multiple sources, consistent results, well documented and accepted methods, etc.), high consensus	Moderate evidence (several sources, some consistency, methods vary and/or documentation limited, etc.), medium consensus	Suggestive evidence (a few sources, limited consistency, models incomplete, methods emerging, etc.), competing schools of thought	Inconclusive evidence (limited sources, extrapolations, inconsistent findings, poor documentation and/or methods not tested, etc.), disagreement or lack of opinions among experts

Modified from: Intergovernmental Panel on Climate Change, 2013. Climate change 2013: The physical science basis. Changes to the underlying scientific/technical assessment (IPCC-XXVI/Doc.4). Working Group I contribution to the IPCC Fifth Assessment Report. Cambridge, UK: Cambridge University Press.

Adaptation: Reducing the Threat of Climate Change and Preparing for its Impacts

Extreme weather and climate events pose a serious threat to the health and welfare of American families and businesses. For instance, between 2011 and 2013, the United States experienced 32 weather events that each caused at least one billion dollars in damages.^[12] 2012 ranks as 2nd costliest year on record, with more than \$110 billion in damages.



EPA is taking a number of common-sense actions to [reduce greenhouse gas emissions](#) and help cities and towns build more resilient communities to prepare for the impacts of a changing climate, including the weather extremes described above.

For more information about climate adaptation and things you can do to prepare for changes in extreme weather events, see the [Adaptation page](#).

For more information on how you can reduce greenhouse gas emissions at home, on the road, and in your workplace, see the [What You Can Do page](#).

References

- [1] Mellillo, Jerry M., Terese (T.C.) Richmond, and Gary W. Yohe, Eds., 2014: *Climate Change Impacts in the United States: The Third National Climate Assessment*. U.S. Global Change Research Program, 841 pp. doi:10.7930/J0Z31WJ2.
- [2] US EPA (2006). *Excessive Heat Events Guidebook* (PDF, 60 pp, 709 K).
- [3] U.S. Climate Change Science Program (2008). *Weather and climate extremes in a changing climate. Synthesis and Assessment Product 3.3* (PDF, 180 pp, 9.5 MB).
- [4] US EPA (2014). *Climate Change Indicators in the United States*.
- [5] Kunkel, K.E., T.R. Karl, H. Brooks, J. Kossin, J. Lawrimore, D. Arndt, L. Bosart, D. Changnon, S.L. Cutter, N. Doesken, K. Emanuel, P.Ya. Groisman, R.W. Katz, T. Knutson, J. O'Brien, C. J. Paciorek, T. Peterson, K. Redmond, D. Robinson, J. Trapp, R. Vose, S. Weaver, M. Wehner, K. Wolter, and D. Wuebbles. 2013. Monitoring and understanding changes in extreme storm statistics: State of knowledge. *Bulletin of the American Meteorological Society* 94:499-514.
- [6] Smith, A.B., and R.W. Katz. 2013. *U.S. billion-dollar weather and climate disasters: Data sources, trends, accuracy and biases. Natural Hazards* 67:387-410. [EXIT Disclaimer](#) (PDF, 24 pp, 578 K).
- [7] NOAA (2013). *Billion-Dollar Weather and Climate Disasters*. National Oceanic and Atmospheric Administration, National Climatic Data Center.
- [8] Intergovernmental Panel on Climate Change (2013). *Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 1535 p.
- [9] NOAA (2013). *Historical records and trends*. National Oceanic and Atmospheric Administration, National Climatic Data Center.
- [10] Intergovernmental Panel on Climate Change (2012). *Managing the risks of extreme events and disasters to advance climate change adaptation*. (PDF, 594 pp, 32 MB). Cambridge, UK: Cambridge University Press.

Rare butterfly reintroduced on San Diego NWR

By Lisa Cox, San Diego National Wildlife Refuge Complex, Pacific Southwest Region

Posted on June 5, 2017



The black, white and orange-checkered butterfly was once commonly seen south of Ventura County. ©Andrew Fisher/USFWS

The recovery of an endangered butterfly in southern San Diego made history last year and is seeing early success.

A team of biologists from the San Diego Zoo Global, the Service, San Diego State University and the Conservation Biology Institute released 742 larvae of the endangered Quino checkerspot butterfly onto San Diego National Wildlife Refuge last December, the first release of captive-reared Quino larvae.

In January, 771 more larvae were released, bringing the total to 1,513.

The Quino population drastically declined over the last decade, and losing the native pollinator could hurt the coastal sage scrub ecosystems there.

"This is the first time we've attempted to release Quino checkerspot butterfly larvae here, and we expect to learn a lot from our work here today," says biologist John Martin of San Diego Refuge. "It's important to help the Quino maintain its distribution, and we hope they will thrive here and disperse to nearby suitable areas of the refuge."

To save the butterfly, the team raised larvae in captivity in the San Diego Zoo's Butterfly Conservation Lab, where zoo entomologists cared for the eggs, larvae and adults. The lab is funded by a Service Cooperative Recovery Initiative grant, which supports projects to help recover some of the nation's most at-risk species on or near national wildlife refuges, and mitigation funds from CalTrans. The long-term goal of the grant is to help the Quino checkerspot butterfly's population recover sufficiently to down-list it from the

Refuge manager Jill Terp and zoo keeper Brandon Rowley prepare protective pods for the larvae's arrival onto the refuge. ©Lisa Cox/USFWS

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endangered species list.

“Quino checkerspots have been reared in captivity in the past, but this is the first time that captive-reared Quino have been returned to the wild to augment wild populations,” Martin says.

A member of the brushfoot family, the black, white and orange-checked 1.2-inch butterfly was once commonly seen south of Ventura County, ranging to the inland valleys south of the Tehachapi Mountains and into northern Baja California. The last time Martin spotted one on San Diego Refuge was in 2012.

The butterfly’s rarity presented a challenge: how to capture enough butterflies to start the breeding program.

Since the Quino’s population was too low to gather adult butterflies from San Diego County, biologists had to resort to collecting them from the Riverside population, about 60 miles northeast of San Diego.

“The genetic work we’ve done indicates that Quino populations throughout their entire range are basically the same,” says Susan Wynn, a biologist with the Carlsbad Fish and Wildlife Office. “Although these populations are widely separated geographically, they are genetically similar and should have similar biological needs. So we think they should do quite well.”

In recent years, the species’ drastic decline was primarily due to the loss of its habitat from increased urban development. Climate change, drought, pollution, invasive plants and fire pose additional threats to the butterfly.

“Humans have had a significant impact on the decline of the Quino checkerspot butterfly,” says Paige Howorth, associate curator of invertebrates at the San Diego Zoo Global. “But humans are also playing a critical role in their recovery and today’s release is an important first step in doing that.”

At the zoo last summer, the new larvae from the captured butterflies entered a period of dormancy, called diapause. This is a natural condition that coincides with the lack of availability of their host plant, dwarf plantain. During this time, the larvae retreat into silken webs and cease all activity. The biologists released them to the wild in this condition.

Beginning in February, biologists started checking the pods once a week, looking for signs of success. In early March, Martin counted 20-30 butterflies on the refuge in one day.

It’s still early, but not bad for a first try.

The U.S. Fish & Wildlife Service is a Strategic Partner of TWS.

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**California Department of
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4949 Viewridge Avenue
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(858) 467-4201
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In Reply, Refer to: FWS-SDG-3181.1

DEC - 6 2002

Mr. Scott Nesbit
Westbrook Fanita Ranch, L.P.
633 W 5th Street, Suite 6770
Los Angeles, CA 90071

Re: Fanita Ranch MSCP Agreement

Dear Mr. Nesbit:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Game (Department) have reviewed your letter regarding the Fanita Ranch property and its relationship to the City of Santee's (City) subarea plan of the Multiple Species Conservation Program (MSCP), dated July 11, 2002.

In 1998, the Wildlife Agencies agreed to the proposed project configuration and mitigation requirements for Fanita Ranch if it proceeds under the Santee Subarea Plan. This mitigation for project impacts required, in part, "...210 acres of land deducted from the open space lands within the Montaña Mirador property... The habitat within the Montaña Mirador property consists of a matrix of chaparral, coastal sage scrub, and a lesser component on native and nonnative grassland." The property also contained approximately 15 pairs of the federally threatened coastal California gnatcatcher (*Polioptila californica californica*; gnatcatcher). However, the Montaña Mirador property was subsequently used as mitigation for other projects, rendering it unavailable for the Fanita Ranch project. The 1998 agreement also included a clause stating that if Montaña Mirador were unavailable for this purpose, "the project proponent will be required to provide 210 acres of open space offsite in areas of long term biological viability that expand the MSCP preserve, as approved by the Wildlife Agencies, which approval will not be unreasonably withheld."

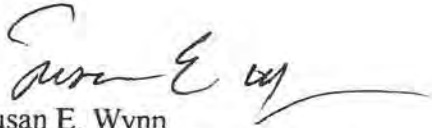
In a meeting held on May 14, 2002, and attended by representatives from the Wildlife Agencies, the City, and the property owners, we affirmed that the 1998 agreement for Fanita Ranch, as a component of the City's MSCP Subarea Plan, would remain in effect, provided that the new compensation habitat expands the MSCP with habitat lands that are at least equivalent in acreage and conservation value to the Montana Mirador lands. As we explained in the meeting, this equivalence must include:

- a. a minimum of 210 acres within the coastally-influenced area (e.g. west of I-15),

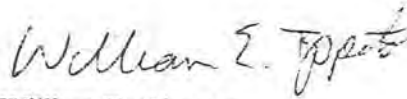
- b. this acreage must be part of a larger block of open space,
- c. the habitat should be high/very quality coastal sage scrub
- d. approximately 15 pairs of coastal California gnatcatchers (*Poliopitila californica californica*)

If you have questions or comments regarding the contents of this letter, please contact Mr David Mayer (Department) at 858-467-4234 or Ms. Patricia Cole (Service) at 760- 431-9440.

Sincerely,



Susan E. Wynn
Acting Assistant Field Supervisor
Carlsbad Field Office
U.S. Fish and Wildlife Service



William E. Tippetts
Environmental Program Manager
South Coast Region
California Department of Fish and Game

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: David Cornell Date: 11/29/18

I'm one of the many outdoor enthusiasts who utilize the unique Mountain bike trails in the area. Please Keep the trails!

From: Devon Connors <DConnors@bycor.com>
Sent: Tuesday, November 27, 2018 11:40 AM
To: John O'Donnell
Cc: Marianne Lamoureux
Subject: Fanita Ranch

As a neighbor directly affected by the potential approval of travesty known as Fanita Ranch, I request a copy of the environmental impact reports related to this project.

Please forward to me at: dconnors@bycor.com

A concerned citizen,
Devon Connors



Devon Connors | Project Engineer | Receptionist
BYCOR General Contractors, Inc.
6490 Marindustry Place | San Diego, CA 92121
Main (858) 587-1901 | Cell (619) 402-6156
Lic. #444203

From: Tamara Cook <no-reply@memberleap.com>
Sent: Sunday, December 9, 2018 9:53 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

Although it is understood some trails will be wider when adjacent to roads or within developed portions of the project the great majority of trails within fuel modifications zones and preserved areas should be narrow and nature based. Trails should be designed to be maintained to no wider than 3 feet within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands.

The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project. Your hard work is appreciated!

From:
Tamara Cook

8030 La Mesa Blvd
La Mesa, CA 91942

From: Tom Cook <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Tom Cook
3755 Avocado Blvd #161

La Mesa , CA 91941
6199294233

From: George Courser <gcourser@hotmail.com>
Sent: Sunday, December 9, 2018 6:40 PM
To: John O'Donnell
Subject: Notice of Preparation(NOP) of a Draft Revised Environmental Impact Report for the Fanita Ranch Project(SCH# 2005061118)



Sierra Club San Diego

8304 Clairemont Mesa Blvd. Suite 101

San Diego, Ca 92111-1315

John O'Donnell,
Principal Planner
City of Santee

Notice of Preparation (NOP) of a Draft Revised Environmental
Impact Report for the Fanita Ranch Project(SCH# 2005061118)

Mr. John O'Donnell,

Sierra Club San Diego finds the NOP an example of repeated "bites of the apple" at entitlement for a project that can only be considered at high risk for wildfire. Future residents and present neighbors would be endangered in the event of any construction due to Santa Ana winds-driven wildfire. The basis of any land use decision should only be considered in regard to conservation and safety, as outlined in the "100% open space conservation alternative" as included in the REIR.

Pursuant to that conservation goal is establishment of major funding mechanisms such as the Readiness and Environmental Protection Integration (REPI) Program, which is endorsed and relied upon by the Department of Defense and all branches of the United States Armed Forces. The presence of United States Marine Corps Air Station Miramar bordering the project site makes this a compelling alternative.

REPI is a long standing government-to-government program which could have been applied for as early as 2003. It is incumbent on the City of Santee to be prepared with a working understanding of the REPI program, with potential to utilize REPI as support for the 100% open space conservation alternative in the REIR.

Please include Sierra Club San Diego in any future project related announcements or hearings.

Thank you for your attention to our initial comments.

Sincerely,

George Courser

Sierra Club San Diego

Conservation Committee

From: JOHN CRIHFIELD <jrc611@cox.net>
Sent: Wednesday, November 28, 2018 8:31 PM
To: John O'Donnell
Subject: Fanita Ranch developement plan and reports

Hello,

I would like the environmental impact reports of the Fanita Ranch project (which I strongly oppose as a Santee resident). Please advise on how one would be able to get access to the reports or get on a mailing list for them. .

Thank you,

Trish Crihfield

From: krakatie2000@yahoo.com
Sent: Sunday, December 2, 2018 12:04 PM
To: John O'Donnell
Subject: Comments on Fanita Ranch EIR

I am opposed to the Fanita Ranch development for several important reasons. The development will move the needle in the wrong direction on San Diego County's greenhouse gas emissions and transit planning. It does nothing to address the actual housing needs in San Diego County for low-income housing near good transit options. It will have tremendous negative impacts on wildlife and on viewsheds for hikers in the area, greatly diminishing the recreational and psychological value of the area. I urge you to take these issues into consideration when deciding the fate of the proposed development.

Thank you,

Katherine Curtis
4809 60th St
San Diego CA 92115

From: Thomas Cvek <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

From:
Thomas Cvek
9320 lake country drive

Santee , CA 92071

From: Anne <adaugherty40@hotmail.com>
Sent: Tuesday, November 27, 2018 6:43 PM
To: John O'Donnell
Subject: Fanita Ranch

Hello Jo Donnell,

I am highly opposed to the Fanita Ranch Development proposed for the end of Cuyamaca. I hike those trails weekly and it pains me to know that it might be going away. Last week I spotted a deer up there and a few weeks before that I saw a bobcat. I do not want that nature to be pushed out of this area. More cars...MORE CONGESTION>>>>I CANNOT TAKE ANY MORE CARS IN SANTEE!!!!!!!!!! I am sick and tired of hearing that we need more funds for the fire department and sherriff. we wouldn't need more funds if we would just stop the stupid cookie cutter ugly houses....row after row of ugly homes does not help any property values in Santee. Part of the reason why we live here because we have beautiful hiking trails. Please do not take this away from us.

Thank you, Anne Daugherty

From: Amy de Leon <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Amy de Leon
1127 Eureka St. #2

San Diego, CA 92110
650.922.9255

From: Ronnie Dellarsina <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Ronnie Dellarsina
1423 Graves Ave. #150

El cajon, CA 92021
619-846-7062

From: Jason DeMendonca <no-reply@memberleap.com>
Sent: Sunday, December 9, 2018 9:53 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Jason DeMendonca
7940 University Ave. Unit 16

La Mesa, CA 91942
6193350544

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

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Name: DOM DIAS Date: 11/28/18

I would like that the TRAILS THAT ARE INCORPORATED INTO THE PLAN USE BEST PRACTICE SINGLE TRAIL DESIGNS AND NOT FIRE ROADS OR WIDE DOG PATHS.

SO THAT THE COMMUNITY WIDE PATHS CONNECT TO THE SINGLE TRACK TRAILS.

SINGLE TRACK TRAILS SHOULD NOT BE ON FALL LINE FOR BETTER TRAIL SUSTAINABILITY.

Thank you

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Name: Matt D. Battista Date: 11/29/18

Some of the trails in Fanita are among the best mountain bike trails in Southern California (Mongo + Space Bull in particular). I would be devastated to lose these trails... to the point that I would consider leaving SD if they are removed. Please do not destroy these trails!!!

Thank You!

Matt D. Battista

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Name: Mike Dolan Date: 11/29/18

What guarantees are there for the land labelled "Habitat Preserve" will remain as such? Can it be reclassified/rezoned in the future?

From: Judy Douglas <judy-douglas@cox.net>
Sent: Tuesday, November 27, 2018 10:36 PM
To: John O'Donnell
Subject: Notification List-Fanita Ranch

Dear Mr. O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Sincerely,
Judy Douglas
10815 Dakota Ranch Rd.
Santee, CA 92071

Sent from my iPhone

From: Brian Eddery <no-reply@memberleap.com>
Sent: Sunday, December 9, 2018 9:53 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Brian Eddery
5904 Poppy st.

La Mesa, CA 91942
6199910268

From: Alice Eyerman <aleyerman@yahoo.com>
Sent: Wednesday, December 5, 2018 5:51 PM
To: John O'Donnell
Subject: Fwd: fanita parkway

Increasing Fanita Parkway north will cause increased traffic, noise and air pollution to residents in the area. Perhaps more important, it will have a negative effect on the Santee Lakes. Padre Dam is making lots of improvements at the Lakes, and making them the prime attraction of Santee. The Lakes need to be promoted and protected and not be a noisy, ugly place with polluted air. When the Lakes were first made, scientists from around the world came to see how it operated. Santee was the cutting edge then. And they made a wonderful recreational area out of a gravel pit. It would be a sad thing now to see it downgraded to a place no longer tranquil. The Lakes are the jewel of Santee, and they need to be maintained for present and future generations.

Alice Eyerman

Begin forwarded message:

From: John O'Donnell <jodonnell@CityofSanteeCa.gov>
Subject: FW: fanita parkway
Date: December 5, 2018 at 12:10:28 PM PST
To: "aleyerman@yahoo.com" <aleyerman@yahoo.com>

Alice,
Per our discussion, I have attached the previous email.

John O'Donnell I AICP I Principal Planner
(619) 258-4100, Extension 182

City of Santee I 10601 Magnolia Avenue
Santee, CA 92071

From: Keith Finch <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

I'm age 58 and have a long history in the proposed Fanita Ranch housing project area. I know of three areas in the santee valley Fanita Ranch area that were native American living areas (metates.) I would be glad to share these locations with anyone interested? In the 1970's I rode my little motorcycle there with my father. I rode through the old oak trees in the valley before they were bulldozed down approximately 20 years ago. I watched my first motorcycle scramble race in the 70's there next to Santee lakes, I've stood in the first turn of that race area 40 years later as if it was yesterday. I'm an avid mountain biker riding these areas and feel lucky it still looks the same as when I was age 10. Change happens but please save some of the history. Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Keith Finch
2165 Brookhurst dr
El Cajon, CA 92019
+16199059927

From: Mark Forte <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:29 AM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Mark Forte
6170 Howell Dr

La Mesa, CA 91942

From: Jose Galaz <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Some of the trails proposed on your current concept plan don't make sense, some are steep wide dirt roads and it doesn't include some of the existing popular trails. Please consider working with local trail user groups to design the best possible trail system that would result on creating a destination and a great asset for your development.

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Thank you for taking my feedback into account on this project,

From:
Jose Galaz
2452 Eagle Valley Dr
Chula Vista, CA 91914
(619)300-6171

FEEDBACK FORM

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Name: JANET GARVIN

Date: 11/29/18

- MY CONCERNS: X1. HOW CAN THE AVERAGE PERSON KNOW THE CONTENTS OF THE 3 THOUSAND PAGES OF THE PRELIMINARY REPORT IN THIS FORMAT?
2. I'M OPPOSED TO ALL DEVELOPMENT OF FANITA RANCH
 3. THE FIRE HAZARD FAR OUTWEIGHS ANY BENEFITS.
 4. TRAFFIC IS ALREADY HORRIBLE, PROPOSED MITIGATION WILL NOT BE ADEQUATE FOR THE INCREASE NEED.
 5. EMERGENCY EGRESS WILL BE INADEQUATE
 6. HOW WILL ALL ENDANGERED SPECIES BE PROTECTED/PRESERVED. EG: CANADIAN CATCHER, WHITE TAILED DEER, BUTTERFLIES ETC.
 7. WHO WILL FINANCE THE BUILDING AND MAINTENANCE OF ALL THE SPECIAL FEATURES? EG: SCHOOL, FIRE DEPT, FARM
 8. PRESERVE ALL OPEN SPACE. OPPOSE ALL DEVELOPMENT. (OVER)

9. EXPOSURE TO DISEASE VECTORS FOR HANTAVIRUS, LYME DISEASE VALLEY FEVER??

From: Janet Garvin <jgarvin1950@gmail.com>
Sent: Monday, December 10, 2018 4:00 PM
To: John O'Donnell
Subject: Re: EIR for Fanita Ranch

Good Afternoon,

I submitted comments on 11/29 but I would like to add the following:

Since we know many Indian tribes were present in our area centuries ago, what will be done to assure the identification, preservation & protection of any findings of archeological significance on the property?

Also, please add me to your email list for all notifications regarding Fanita Ranch EIR process.

Please confirm receipt of my email.

Thank you,

Janet Garvin

10338 Settle Rd Santee, CA 92071

619-987-6609

From: Gloria Gerak <gvgerak@cox.net>
Sent: Monday, November 19, 2018 7:58 AM
To: John O'Donnell
Subject: Requesting Notifications of EIR or any changes to the Fanita Ranch Project.

Can you please put me on the Alert or Mailing List

Ronald and Gloria Gerak

Thanks,

9605 St. Andrews Drive
Santee, CA 92071
619.562.6622 Office & Fax
Mobile 619.300.6623



Please consider the environment before printing this e-mail

CONFIDENTIALITY NOTICE, PLEASE READ: This e-mail message, including any attachments, is for the sole viewing and use of the intended recipient(s) and may contain confidential and privileged information within. Any unauthorized review, use, disclosure or distribution is prohibited.

From: John Gerstenberg <no-reply@memberleap.com>
Sent: Monday, December 10, 2018 9:21 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

As a 30 year Santee resident and a possibly interested home buyer in Fanita Ranch, I find placement of a "village" that is largely in the flight path of Miramar, downwind of a land fill, and then downwind and in sight of a sewage treatment facility quite concerning. The noise of jets and helicopters conducting training and smells from the landfill and treatment plant in the proposed village area are frequently quite noticeable. How is that to be mitigated? Sorry, but this is not a neighborhood I would want to live, shop or dine in.

Placement of another village at what appears to be on top of a ridge in a high severity fire zone with only 2 roads is a disaster waiting to happen! Fuel reduction/management, construction of homes with fire resistant materials may help somewhat but recent wind-driven wild fires in this state have proven this is no guarantee.

Please consider focusing development in the southern end of the property where some of the streets coming up from mast Blvd. and Carlton Hills could also be used for evacuation routes in the event of a incident and the SDG&E road for the power lines could be utilized as part of a fire break. This would also reduce infrastructure construction costs (roads, utilities, etc.) and long term maintenance costs for these as well. Keep the northern/eastern part of the property as open space.

I like the idea of open space and a trail system available to the entire Santee community. This promotes an active, healthy life style for the entire community. The trails should be single track or narrow trails (3 feet wide or less) that follow the natural contours of the land and are sustainable. These ideally should either form loops or they should lead to other parts of the greater Santee community, Santee Lakes, parks within the Fanita Ranch development, the Stowe Trail, and Sycamore Canyon/Goodan Ranch. Utility roads and fire breaks that follow the fall line of a hill are unsustainable as trails and are dangerous to use due to the loose rocks, erosion, ruts and extreme grades. Trails should be multi-use and support activities such as hiking, jogging, mountain biking and even equestrian use wherever possible.

Thank you for taking my feedback into account on this project,

From:
John Gerstenberg
10191 Prince Charming Ln
Santee, CA 92071
6194487528

FEEDBACK FORM

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Name: Zack Gianino Date: 11-29-2018

- 1.) Again, I do not see a ~~solution~~ solution for the poor access and fire hazard still present.
- 2.) Water? How are we going to supply all this water? Tap to toilet? SDG&E Price Hike?
- 3.) Tribes? How do you ~~mitigate~~ mitigate dealing w/ tribal land & usage?
- 4.) I'd like to see an open space Alternative!!!

From: Ricardo Gomez <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Ricardo Gomez
4395 Country Trails Ct

Bonita, CA 91902
6199725088

From: Marni Borg <mborg@CityofSanteeCa.gov>
Sent: Thursday, November 15, 2018 12:36 PM
To: Diane Sandman
Subject: FW: Fanita Ranch NOP Comment

From: John O'Donnell
Sent: Wednesday, November 14, 2018 11:32 AM
To: Marni Borg
Cc: Melanie Kush
Subject: FW: Fanita Ranch NOP Comment

John O'Donnell | AICP | Principal Planner
(619) 258-4100, Extension 182
City of Santee | 10601 Magnolia Avenue
Santee, CA 92071

From: Gowens Ed [<mailto:egowens@san.org>]
Sent: Wednesday, November 14, 2018 9:16 AM
To: John O'Donnell
Subject: Fanita Ranch NOP Comment

John,

Thanks for the notice to the San Diego County Regional Airport Authority on the Notice of Preparation for a draft Environmental Impact Report for the Fanita Ranch Project.

Based upon the information provided in the NOP, the Project site lies outside of the Airport Influence Area of the adopted Airport Land Use Compatibility Plan for Gillespie Field. Therefore, the Project does not appear to have any potential conflicts with the ALUCP, nor does it require review by SDCRAA as the Airport Land Use Commission for San Diego county.

Thanks again for the notification.

Regards,

Ed Gowens

Senior Airport Planner
Airport Land Use Commission
San Diego County Regional Airport Authority →
Post Office Box 82776
San Diego, California 92138-2776
voice (619) 400-2244

All correspondence with this email address is a matter of public record subject to third party review.

Is it worth a tree to print me?



FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: GARDNER GRADY Date: 11/29/2018

OPEN SPACE OPTION!

From: Joseph Graf <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

From:
Joseph Graf
1667 Trenton Way, None

SAN MARCOS, CA 92078
7604702309

From: Paul Greco <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Paul Greco
7737 Bacadi Dr

San Diego, CA 92126
8184458289

From: ron danielle <ronanddanielle@yahoo.com>
Sent: Sunday, December 2, 2018 6:02 PM
To: John O'Donnell
Subject: Notification Request for Revised Environmental Impact Report

Dear Mr. O'Donnell,

Please place us on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you.
Ron & Danielle Griffin
Long time Santee Residents

Sent from my iPhone

FEEDBACK FORM

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Name: BILL GROLZ Date: 11/29/18

1. ENDANGERED SPECIES PRESERVATION/ICA NATCATCHER.
ANY OTHER ENDANGERED SPECIES.
2. PRESERVE ALL OPEN SPACE
3. OPPOSE ALL DEVELOPMENT,
4. OPPOSE DEVELOPMENT IN A "SEVERE FIRE HAZARD ZONE."

From: Michael Gruber <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Michael Gruber
11344 Valle Vista Rd

Lakeside, CA 92040
6194153174

From: Kyle Gunderman <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Kyle Gunderman
3300 6th ave

San Diego, Ca 92103
6193660775

From: Christopher Haringer <chris.haringer@gmail.com>
Sent: Friday, December 7, 2018 10:44 AM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report.

First and foremost, allow me to strongly recommend that no development ever be allowed to occur at Fanita Ranch; I believe the community of Santee has already been quite vocal in voicing similar feelings and concerns over the past few decades. My wife is a Santee native and has fondly shared stories of her childhood spent walking around and exploring the now almost non-existent open space in Santee. I used to come to Santee several times a week to enjoy mountain biking and experience the peaceful natural environment in the now disappearing singletrack trail systems in Santee. Our friends who live in Santee regale us with stories of the horrific traffic they now already have to endure daily on many roads, to include specifically Mast Blvd and Highway 52. And of course all of us who are from San Diego, or have spent a considerable amount of our lives here, know all too well about the fire dangers of any housing development built adjacent to and/or within open space areas: Fanita Ranch seems like the perfect example of a disastrous fire situation that need not be created. Building a housing development in Fanita Ranch seems completely out of step with our society's current understanding of the need to preserve open spaces for the health and welfare of the community, and the need to not build new housing adjacent to and directly within an area that has historically proven to be a very fire-prone area.

Beyond my strong protest of any development within Fanita Ranch, my comments specifically relate to trail and trail standards...again, hopefully as part of a city-planned open space that does not include any development within Fanita Ranch! Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

The great majority of trails within fuel modifications zones and preserved areas should be narrow and nature based. Trails should be designed to be maintained to no wider than 3 feet (i.e., singletrack) within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands. In most cases, the singletrack trails that have existed in the hills of Fanita Ranch (and not the lower valley areas that have been subjected to off road vehicle abuse) for decades perfectly show the sustainability and sensitive environmental impact of thoughtfully built singletrack trails.

Furthermore, the connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to parks, the community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch.

Thank you for taking my feedback into account on this project,

Chris Haringer

858-997-6855

From: Chris Haringer <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report.

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Thank you for taking my feedback into account on this project,

From:
Chris Haringer
3434 Alabama Street
San Diego, CA 92104

From: David Hernandez <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:12 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
David Hernandez
1991 DON LEE PLACE SUITE K

ESCONDIDO , CA 92029
7606443070

From: Sean Highfield <no-reply@memberleap.com>
Sent: Monday, December 10, 2018 5:34 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,
Sean Highfield

From:
Sean Highfield
3014 COLE GRADE DR

SANTEE, CA 92071
6195870938

FEEDBACK FORM

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Name: Tim Hill Date: 11-29-18

Traffic needs to be fixed before any new development
Traffic was bad on 52 before the ¹²⁵ toll roads went through

MAST is an awful parking lot in the morning.

WAZE did not cause traffic on mast. If it did El Nopa would be backed up too. It is not. They have not even begun to move into Western and now they want 2900 more homes?

We need to ^{existing} improve infrastructure before adding any more homes

From: Eric Hollander <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Eric Hollander
9412 Hito Ct

San Diego, CA 92129
619-817-6447

From: William Hooper <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
William Hooper
20692 porter ranch road

Trabuco canyon, CA 92679
9496324783

From: James Hoyle <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
James Hoyle
3371 Avenida Nieve

Carlsbad, CA 92009
7608464810

From: Robert Hubbard <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:29 AM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Robert Hubbard
6409 Shirehall Drive

San Diego, CA 92111
+17143963606

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Name: Howard & Marge Date: 11-29-18
Hudson

Even w/ some road improvements - this project will still be dumping more than 5,000+ cars onto Main heading to 52 or 125. Santee is not ready for all this traffic.

From: Mary Hyder <mehyder1222@yahoo.com>
Sent: Thursday, November 29, 2018 1:12 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell,

Can you please provide me with notifications when environmental impact reports related to Fanita Ranch are issued? Please email me at the email address below or mail to my home at: 375 Whispering Willow Dr #D, Santee, CA 92071.

I am not a fan of the Fanita Ranch project because I do not think it takes into account and provides the necessary infrastructure to safely and conveniently navigate in and out of Santee.

Thank you,

Mary

Mary Hyder
1.619.723.0916
mehyder1222@yahoo.com
Sent from my iPhone...sorry for any typos

From: Jessica Iburg <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:31 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Jessica Iburg
5325 Wellesley St

La Mesa, CA 91942
8583490050

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsantee.ca.gov.

Name: Tim Ingersoll Date: 11/29/18

Please do everything possible to preserve existing trails in the Fanita Ranch area. Please work with the San Diego Mountains Biking association on all trail development issues.

Thanks,

Tim Ingersoll
-SDMBA Board member

From: Ippolito, Sharon <Sharon.Ippolito@sdcounty.ca.gov>
Sent: Monday, November 26, 2018 10:35 AM
To: John O'Donnell
Cc: Vertino, Timothy
Subject: Fanita Ranch Project: Request for extension
Attachments: Notice of Preparation for Fanita Ranch Project.pdf

Good Morning, Mr. O'Donnell,

I received the attached notice late Wednesday, November 21st. I distributed it for comments this morning. We are trying diligently to comply with the December 10th deadline, but I'm writing to you to see if we can possibly have a few extra days as a buffer, if necessary.

Please let us know, and I appreciate your consideration.

Thank you,
Sharon

Sharon Ippolito, Administrative Analyst III
Public Records Act Request Coordinator
Planning & Development Services
County of San Diego Land Use & Environment Group
O: (858) 495-5450



From: Clark Jackson <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Clark Jackson
4664 Dana Dr

La Mesa, CA 91942
8588298230

From: RickDeb <rickdebjenkins@gmail.com>
Sent: Monday, November 26, 2018 9:10 AM
To: John O'Donnell
Subject: Fanita Project

Dear Mr O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

-Rick Jenkins

RickDebJenkins@gmail.com

From: Matthew Judge <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Matthew Judge
3880 Florida St. Apt 23

San Diego, CA 92104
6163755066

From: Robert Kay <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Robert Kay
4049 Tim St

Bonita, CA 91902-2544
+16195080175

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsantee.ca.gov.

Name: Colin Kennedy Date: 11/29/18

These trails are fantastic. Please don't allow
suburban sprawl to overtake them!

From: Pam Kerzner <pamela.kerzner@gmail.com>
Sent: Wednesday, November 28, 2018 3:01 PM
To: John O'Donnell
Subject: Proposed Fanita Ranch

Please send me environmental reports.

Thank you.

Sent from [Mail](#) for Windows 10

From: Pam Kerzner <pamela.kerzner@gmail.com>
Sent: Wednesday, November 28, 2018 3:15 PM
To: John O'Donnell
Subject: Please send me environment reports on Fanita Ranch.

pam

Sent from [Mail](#) for Windows 10

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

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Name: Pam Kerzner Date: 12-10

MORE OPEN SPACE NEEDED

LESS HOUSING UNITS

MORE OUTBOUND ROADS

From: Andrew Khodaverdian <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Andrew Khodaverdian
13013 Calle de las rosas

San Diego , CA 92129
8186403098

From: Kerstin Kirchsteiger <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 2:42 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Kerstin Kirchsteiger
11483Westonhill Dr

San Diego, CA 92126
8584013466

From: Austin Kruisheer <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Austin Kruisheer
7158 Hillsboro st.

San Diego, CA 92120

December 9, 2018

Dear Mr. O'Donnell

1. Please send me all notifications and updates regarding the Fanita Ranch and/or Home Fed projects.
Patti LaBouff pattipt@cox.net
2. Please expect the Fire Safety review to go beyond the current regulations established for California, as those standards did not suffice in the most recent state fires. The EIR should include a description of enhanced protections now needed due to climate breakdown to insure no loss of life or property, even if those protections are not yet codified.
3. In the Environmental Impact Report review, please include the option of No Development within the project's entire property boundaries.
4. Please consider a commercial development alternative (not residential) as one of the options reviewed in the EIR.
 - a. Create an Outdoor, Fitness and Garden Community that supports and compliments our Santee Wild Spaces, and that generates additional fee revenues into the City.
 - b. In the sectors closest to Santee Lakes, develop a joint City Recreational/private business Enterprise that will attract outdoor and fitness enthusiasts, rock climbers, birdwatchers, hikers, horse riders, mountain bikers, organic gardeners, and others from across the County.
 - c. Create free, fee-based and for-profit opportunities for San Diego County residents to take advantage of:
 - Rock Climbing
 - Indoor and Outdoor Gym
 - Track and Outdoor Fitness
 - Community Organic Garden and plots
 - Education Center with classrooms
 - Santee Senior Center
 - Santee Teen Center
 - Food and Beverage concessions
 - Other commercial enterprises that fit into this theme of supporting and promoting the enjoyment of our Wild Spaces, while preserving and protecting the fragile environment (and not building more urban sprawl).

Sincerely,

Patti LaBouff

From: Lindsey Richert <lrichert4@gmail.com>
Sent: Sunday, December 9, 2018 8:05 AM
To: John O'Donnell
Subject: Environmental Impact Report

Dear Mr. O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you,

Lindsey Laird

From: Greg Lambert <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Bitterroot Travel Plan Objection

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report.

I am opposed to the development of the Fanita Ranch project for the following reasons.â€”
First & foremost, public safety, limited egress concentrated traffic onto 3 arteries. 1st responders response times will skyrocket, let alone imagine an outcome like campfire and paradise fires.
â€”â€”
â€”Managed growth with proper infrastructure is key, the gridlock on HWY52 and sounding streets must be fixed before there is any new large development such as the Fanita Ranch project. And to preservation of one of the last remaining open spaces in San Diego County to protect endangered species and the preservation of native artifacts
The environmental impact with regards to waste and wastewater negatively impacting the San Diego River and sounding areas.

Thank you for taking my feedback into account on this project

Greg Lambert greg@lambertphoto.com

From:
Greg Lambert
13641 Cuesta Del Sol
Lakeside, CA 92040
6197438888

From: Marianne Lamoureux <mlamoureux@bycor.com>
Sent: Tuesday, November 27, 2018 10:46 AM
To: John O'Donnell
Cc: 'plumbrog@yahoo.com' (plumbrog@yahoo.com); lamoureuxmarianne@yahoo.com
Subject: Fanita Ranch

As a neighbor directly affected by the potential approval of travesty known as Fanita Ranch, I request a copy of the environmental impact reports related to this project.

Please forward to me at: mlamoureux@bycor.com

A concerned citizen,
Marianne Lamoureux
10034 Carlton Hills Blvd.
Santee, CA 92071



Marianne Lamoureux | Project Engineer | LEED AP
BYCOR General Contractors, Inc.
6490 Marindustry Place | San Diego, CA 92121
Main (858) 587-1901 | Direct (858) 362-8928 | Cell (619) 341-1007
Lic. #444203

From: Frank Landis <franklandis03@yahoo.com>
Sent: Monday, December 10, 2018 11:49 AM
To: John O'Donnell
Subject: CNPSSD Comment on NOP for the Fanita Ranch Project
Attachments: CNPSSD response to Fanita NOP 20181210.pdf

Dear Mr. O'Donnell,

Please find attached CNPSSD's response to the NOP for the Fanita Ranch Project. Let me know if you received this and can open the attachment.

Please also keep CNPSSD informed of all meetings, updates, and new documents on this project, at this address and conservation@cnpsd.org.

Sincerely,

Frank Landis

Conservation Chair

CNPSSD

California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O Box 121390
San Diego CA 92112-1390
conservation@cnpsd.org | www.cnpsd.org

December 10, 2018

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071
By email to jodonnell@cityofsanteeca.gov

RE: Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project (SCH #2005061118).

Dear Mr. O'Donnell,

Thank you for the opportunity to comment on the Fanita Ranch Project ("Project") and the Notice of Preparation ("NOP") for the draft revised Environmental Impact Report ("REIR"). CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, and climate change as it affects both.

What remains of the historic Fanita Ranch is highly constrained in a way that makes any further development footprint unreasonably impact public safety and public resources. Therefore, a full site conservation alternative that analyzes funding mechanisms should be analyzed as best option, unless the desire is to create a "Paradise Ranch" disaster scenario.

That said, the latest iteration of the proposed Fanita Ranch Project contains a host of issues that need to be analyzed and mitigated before the project comes up for approval. Unfortunately, the biggest issue is structural. The project appears to be a fairly standard iteration of subdivision sprawl made according to the standard models of the last 40 years, which is understandable for a company that does not want to invest in innovation. The problem is that the big need in housing is innovation. That innovation consists of:

- Affordable housing, where there is enormous demand but shockingly little willingness among developers to provide a supply, contrary to conventional economic thinking. Where is the affordable housing in this development?
- Fire safety. Climate change has increased fuel dryness and fire severity to the point where towns that practice fire drills, like Paradise, CA, are annually overrun, and homes built to current fire codes (as in the Tubbs fire of 2017) burn to the ground. This is not just a matter of home design but of community design, as a community that surrounds all evacuation routes with flammable vegetation is begging for trouble.
- Renewable energy. For some reason, too many developers seem to believe that slapping a solar panel on a conventional house solves the problem of converting civilization to run entirely on renewable energy. If it was that easy, we would not have as big a climate crisis as

we do. If a project wishes to minimize its greenhouse gas emissions, it needs to design roofs as solar arrays, meaning they all need large expanses of roof facing the southern sky. A conventionally designed subdivision, with curving roads and homes with complex rooflines pointed in any random compass direction, wastes the opportunity to collect solar energy. This is a problem with the current design. Making space in the garage for a house battery is useful too.

A bit of thought would indicate that Fanita Ranch would do well to start its design from a site constraints and societal needs analysis, and build up within those constraints. Instead, the proposed project, already mapped out, is guaranteed to be suboptimal for the 21st Century, rather than innovative.

More detailed comments on plants, fire, and climate change follow.

Plant Issues

First, please follow CEQA guidelines exactly. Perform proper surveys, create mitigation plans before the DREIR is released, and work to protect known sensitive species on the site, such as the San Diego Goldenstar. Perform surveys at times when species are likely to be active, which includes winter for such species such as Campbell's liverwort (*Geothallus tuberosus*) which prefers undisturbed cryptogamic crusts with perched water tables in open shrublands that have not been burned in 50 years. A couple of botanic surveys in April and May are insufficient.

Second, In addition to a full site conservation alternative, **PLEASE ANALYZE AN ENVIRONMENTALLY SUPERIOR PROJECT ALTERNATIVE** that focuses on a single, compact development at, with the perimeter for the brush management zone minimized. The project site contains substantial, high value wildlands, and a simple design to preserve them would be useful. As the wildlife agencies have asked for something similar, please include an analysis of this project alternative in the DREIR.

Fire Issues

In the aftermath of San Diego County's approval of projects such as Valiano and Harmony Grove Village South, as well as the Camp and Woolsey Fires, a number of questions need to be answered as part of the fire and evacuation sections of the EIR.

First, please answer, in its entirety, the question VII.h) from the CEQA checklist: "Would the Project...Expose people **or structures** to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?" (emphasis added). Too many fire sections in EIRs have focused entirely on human safety, with the implicit notion that all the buildings will be lost in the fire. If the people are safe but their \$500,000+ homes are lost, they are impacted, as is Santee and its tax base. This needs to be analyzed and either mitigated properly or admitted as an unmitigable impact of the proposed Project.

Second, in recent EIRs there has been a lamentable blurring of terms around "shelter in place" (such as the County's recent "shelter on site," whatever that means). If shelter in place is to be considered an option, please define what features of every building and the surrounding landscaping are part of the system, and how people will be trained and practice to use them. The only example of successful, design-based shelter in place recently was how Pepperdine University sheltered several thousand students from the Woolsey fire. The Pepperdine campus was designed explicitly for that purpose, from the wide lawn margin to building design.¹ Shelter

¹ <https://la.curbed.com/2018/11/20/18097889/wildfire-pepperdine-malibu-shelter-in-place>

in place, like good solar power, is a site-based design, not a slogan stenciled on the wall of a standardized housing product. If there is no intention to build truly fireproof buildings with wide, plant-free areas around them and to design the entire community to shelter its members, then do not use this a fire safety plan.

Third, “ready, set, go” planning was verbally denigrated by both County Sheriffs and CalFire as unworkable in the County Supervisor hearings to approve Harmony Grove Village South. They spoke in favor of phased evacuations and “shelter on site,” which is apparently preferable to burning to death in one’s car in a traffic jam. In the evacuation plan, please include consultation from CalFire and County sheriff about the best options for the proposed Project.

Fourth, in the face of the Camp Fire, the town of Paradise was supposed to do a phased evacuation, but the system failed in part because the fire moved faster than expected, in part because the roads were too narrow for evacuation, and in part because the system used for reverse 911 calls for a phased evacuation has a maximum upper number of numbers it could call per hour, and that number was grossly inadequate for the speed of the Camp Fire. If phased evacuations are to be used in the EIR, please determine how fast the first responders could arrive to set up traffic control and how fast any phone based system can call people. If these systems are too slow, do not recommend this as an option.

Finally, **PLEASE INCLUDE A PROJECT ALTERNATIVE THAT MINIMIZES FIRE RISK.** This would include (among other things) fire-safe housing design, hardscape five feet out from buildings, no wooden fences near or especially attached to buildings, simple roof lines without pockets, that do not collect debris that can burn when an ember lands, plantings well away from homes, irrigated native plantings within the development (it takes less water to hydrate natives than non-natives, so they can be kept less flammable with less water), multi-lane avenues in and out to ease evacuation, compact community near existing roads so that people can evacuate into the safer urban area quickly, minimized brush management zones (this also minimizes the front exposed to an oncoming fire, and not positioning vulnerable people (like “active adult” seniors) on the windward side of the community, where they face the fire first and must react the fastest.

Greenhouse Gas Impacts

First, minimize the use of carbon offsets to mitigate these impacts. One current court case appears to suggest that large-scale use of carbon offsets, especially outside the County, may be legally problematic. Use good design to minimize emissions.

Second, it is essential that the street trees in the landscaping plan should not overshadow the solar panels per Public Resources Code Division 15, Chapter 12. Solar Shade Control [25980-25986], passed in 1974. In practice, this means simply involving the landscape architect creating the street tree plan with the housing plan, so that the landscape architect knows where the panels will be and can avoid them in their design. This is something landscape architects are trained to do.

Third, make room in near the main circuit breaker panels for house batteries, presumably about the size of two filing cabinets back-to-back. Additionally, be clear about which buildings will have circuits suitable for electric car chargers installed in them, as many recent EIRs have been vague on this issue and had to do rewrites in the final EIR. Finally, install natural gas lines away from these electrical systems, as the combination of high wattage car chargers, highly flammable large lithium batteries, and a natural gas line a few inches away make for a firefighting nightmare and may impede evacuations during a building fire. Separating the gas and electricity is a simple safety measure.

Fourth, if traffic calming measures such as road bumps and roundabouts are deployed to minimize greenhouse gas emissions from cars, please also work mandate that the greenhouse gas analysts work with the evacuation planners to make sure that the features designed to minimize road speed during normal times do not become death traps during a wildfire. This involves requiring the consultants who prepare each section to communicate with each other to reach a design that accommodates both goals.

Finally, **PLEASE INCLUDE A PROJECT ALTERNATIVE THAT MINIMIZES GREENHOUSE GAS EMISSION.** This involves site and building designs that (among other things) maximize solar energy uptake, minimize self-shading, and minimize car emissions through things like making streets more walkable.

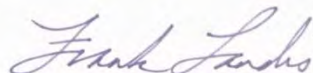
Project Alternatives

As with most of the current generation of large subdivisions, Fanita Ranch is a dangerous, high fire area with substantial biological resources. As such, it is probably more cost effective for the city of Santee to keep it as open space than it is to provide the services and periodic rebuilding it needs. That is why the conservation alternative needs to be analyzed, as it was in the 1998 EIR.

While it may seem extravagant to ask for three separate project alternatives, an alert reader may notice that the plant, fire, and greenhouse gas alternatives can all be accommodated in one project proposal, which should be the environmentally superior alternative for the DEIR. This is the point of innovation: it is entirely possible to innovate and meet Santee's housing needs in less-destructive ways. We hope that the project proponents take this proposal seriously and put real effort into finding an alternative that uses the site to meet Santee's needs for the 21st Century, instead of pushing for yet another obsolescent suburban sprawl whose houses are unaffordable to most of the County's residents.

Thank you for taking these comments. Please keep CNPSSD informed of all developments with this project and associated documents and meetings, through email to conservation@cnpssd.org and franklandis03@yahoo.com.

Sincerely,



Frank Landis, PhD
Conservation Chair
California Native Plant Society, San Diego Chapter



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 694-2962 • Fax (858) 694-2555
www.sdcounty.ca.gov/pds

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

December 13, 2018

John O'Donnell
Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

Via e-mail to: jodonnell@cityofsanteeca.gov

REQUEST FOR COMMENTS ON THE FANITA RANCH PROJECT FOR THE CITY OF SANTEE

Dear Mr. O'Donnell,

The County of San Diego (County) reviewed the City of Santee's (City) Notice of Preparation (NOP) of a Draft Revised Environmental Impact Report (DEIR) for the Fanita Ranch Project (Project), received on November 15, 2018.

The County appreciates the opportunity to review the Project and offers the following comments for your consideration. Please note that none of these comments should be construed as County support for this Project.

GENERAL

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

TRAFFIC/TRANSPORTATION

1. The County requests a complete traffic impact study be prepared as part of the DEIR to analyze and determine whether the project would result in any impacts to County-maintained roadways or result in a potential traffic-related impact requiring mitigation.
2. Please provide County staff with a copy of the traffic impact study and appendices once the DEIR is prepared.

WATERSHED PROTECTION

1. The Project could potentially generate stormwater impacts to adjacent private parcels located in the unincorporated county. Therefore, the project must consider the following items:
 - a. Compliance with the San Diego Municipal Storm Water Permit Order No. R9-2013-0001, (as amended by Order Nos. R9-2015-0001 and R9-2015-0100). The project should consider implementing permanent Site Design, Source Control, Pollutant Control, and Hydromodification Management in accordance with your municipal jurisdiction's BMP Design Manual as required by the San Diego Municipal Storm Water Permit Order No. R9-2013-0001.

PARKS AND RECREATION

1. General:
 - a. The County Department of Parks and Recreation (DPR) owns and manages Goodan Ranch/Sycamore Canyon Open Space Preserve, located immediately north of the proposed Project. References to the County's Goodan Ranch Regional Park and Sycamore Canyon Open Space Preserve should be corrected to read "Goodan Ranch/Sycamore Canyon Open Space Preserve" throughout the document.
 - b. Please ensure the environmental analysis evaluates impacts from the proposed Project on adjacent Preserves, wildlife corridors and associated wildlife including Goodan Ranch/Sycamore Canyon Open Space Preserve, Clark Canyon and other adjacent areas.
2. Habitat Preserve: Ensure the preserve management and monitoring for the habitat management plan has a dedicated funding source, which would implement access control measures, trail maintenance, and habitat maintenance, monitoring and protection. DPR suggests a Public Access Plan component be prepared as part of the Habitat Management Plan for the habitat preserve, which should also address regional trail connectivity to Goodan Ranch/Sycamore Canyon Open Space Preserve.
3. Parks, Trails and Recreational Facilities/Regional Connectivity:
 - a. Please clarify whether equestrian uses would be permitted within the proposed trail system, the current description would accommodate walking biking and jogging. Goodan Ranch/Sycamore Canyon Open Space Preserve trails system is a non-motorized, multi-use trail system open to hikers, bikers and equestrians. Continued equestrian connectivity south of the Preserve would be an asset to recreational users in the County and Santee.
 - b. Provision of trailheads at many of the mini-parks is encouraged, dedicated trail staging areas should also be considered in the design of the project.
 - c. This section denoted a system of on-street and off-street trail facilities totaling approximately 35 miles, however the Habitat Preserve section denotes an approximate 35-acre trail system through the Habitat Preserve. Please clarify if it will be both 35 linear miles and 35 acres or if it is one or the other.
 - d. Figure 5: Parks and Trail Plan provides conceptual alignments for proposed trails, additional details including types of trails (pathway, nature trail, primitive trail) management entity and construction should be detailed in the EIR. Some of the proposed trails within the project do not connect to formal trails, we suggest proposed trails connect to existing formalized trails or future connections be proposed to areas that may include trail connectivity in the future (e.g. planned in

existing planning documents like the County's Community Trails Master Plan [CTMP], Lakeside Community Trails Plan, Sycamore Canyon Goodan Ranch Preserve Public Access Plan, etc.)

- e. Examples for trail standards can be found in the CTMP available here: <https://www.sandiegocounty.gov/content/sdc/pds/community-trails-master-plan.html>
 - f. Provide a discussion on operations and maintenance for the park, trails and recreational facilities in the environmental analysis, including how access control measures will be implemented to ensure protection of the proposed Habitat Preserve and the adjacent Sycamore Canyon Open Space Preserve.
4. The County is currently updating the Resource Management Plan and Public Access Plan for Goodan Ranch/Sycamore Canyon Open Space Preserve, and can share these materials as they are updated to ensure coordinated trail connectivity between the adjoining properties. Current materials for these documents can be found on our website at www.sdparks.org or you may contact Melanie Tylke, Land Use Environmental Planner at 858-966-1377 or melanie.tylke@sdcounty.ca.gov for more information.

HAZARDOUS MATERIALS

1. The planned community proposal includes a fire station, farm, special use area, and possible Homeowner's Association (HOA) which may have been known to commonly store 55 gallons or more of hazardous materials or generate any amount of hazardous waste or medical waste (e.g. emergency generators, medical waste, maintenance equipment and chemicals, etc.). Please be advised the facility owner or manager(s) are required to submit a Hazardous Materials Questionnaire to the Hazardous Materials Division (HMD) and complete a HMD Hazardous Materials Plan Check review prior to operation. For your reference, guidance and information regarding the plan check requirement can be reviewed at: https://www.sandiegocounty.gov/content/sdc/deh/hazmat/hazmat/hmd_plan_check.html
2. Please be advised, any proposed activities involving hazardous materials or generating hazardous/medical waste will require the operator(s) to apply for a Unified Program Facility Permit through the California Environmental Reporting System (CERS) and comply with local and state laws and regulations.
3. Please be advised, any and all construction-related hazardous materials generated and stored onsite must be properly labeled and handled in a manner to prevent release to the environment. In addition, the applicant and/or contractor(s) must ensure any hazardous wastes generated onsite during construction is properly labeled and disposed by a registered hazardous waste hauler.
4. Please note, the HMD has the authority pursuant to State law and County Code to regulate facilities that handle or store hazardous materials and/or generate hazardous/medical wastes. The HMD will apply that authority as necessary to protect public health and the environment. Additional information can be found on our website at: <https://www.sandiegocounty.gov/content/sdc/deh/hazmat.html>.

VECTOR CONTROL PROGRAM

The County's Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed review and has the following comments regarding the proposed project.

1. The VCP respectfully requests that the project design features address potential impacts from possible mosquito breeding sources created by the project and that the project is constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading

activities and vehicle tires, tree pits, and landscaping do not result in depressions that will hold standing water. In addition, ensure drainage areas and BMP structures including swales, catch basins and culverts are designed and maintained in a manner so as not to create potential mosquito breeding sources. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development.

2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.
3. Please be aware that the VCP routinely inspects and treats as needed several known mosquito breeding sites near or adjacent to the proposed project site, including aerial larvicide treatments (via helicopter) to portions of the Sycamore Creek adjacent to Santee Lakes. These aerial treatments take place approximately every three weeks from April or May through September or October, and the helicopter may be visible from areas within the proposed project site.
4. For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at: http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/vector_guidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/MosquitoesandMosquitoBorneDiseases.aspx#>
5. If you have any questions regarding these VCP comments, please contact Daniel Valdez at 858-688-3722 or by e-mail at Daniel.Valdez@sdcounty.ca.gov.

The County appreciates the opportunity to comment on this Project. We look forward to receiving future documents related to this Project and providing additional assistance, at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner, at (858) 495-5468, or via e-mail at timothy.vertino@sdcounty.ca.gov.

Sincerely,



Eric Lardy, AICP
Chief (Acting), Advance Planning Division
Planning & Development Services

E-mail cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2
Mel Millstein, Group Program Manager, LUEG
Sheri McPherson, Project Manager, DPW
Jeff Kashak, Land Use / Environmental Planner, DPW
Kimberly Jones, Land Use / Environmental Planner, DPW
Marcus Lubich, Sr. Park Project Manager, DPR
Emmet Aquino, Park Project Manager, DPR
Melanie Tylike, Land Use Environmental Planner, DPR
Daniel Valdez, Environmental Health Specialist, DEH
Mary Bennett, Administrative Analyst, DEH

From: Layton, Kimberley <Kimberley.Layton@Chargers.nfl.com>
Sent: Tuesday, November 27, 2018 10:21 AM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell,

I received a note on my front door saying the approval process had begun again for Fanita Ranch. I have seen some of their "marketing" materials but am still obviously concerned about the scope of the project and it's traffic impacts since I live off the northern end of Cuyamaca. Please put me on the notification list for the release of the project's revised EIR.

I'm assuming we will also be given ample notice by mail/email for all upcoming hearings? Please let me know.

Thank you so much – and happy holidays!

-Kimberley Layton



KIMBERLEY LAYTON | Vice President - External Affairs

Tel: (714) 540-7100

Hoag Performance Center | 3333 Susan St, Costa Mesa, CA 92626

www.chargers.com

A dark blue promotional banner with a white border. On the left, it says "BACKSTAGE: CHARGERS" in large white letters. Below that, it says "PRESENTED BY" followed by the Toyota logo and "TOYOTA". On the right, there is a blue box with a yellow border that says "SUBSCRIBE NOW" in white, with a white play button icon and "Facebook Watch" below it. The banner has some yellow and white diagonal lines on the left and right sides.

Thank you for your consideration

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteca.gov.

Name: ALISON LIEBRECHT

Date: 11-29-18

As a resident of District 1 and a member of SDMBA (SAN DIEGO MOUNTAIN BIKE ASSN), I HAVE A LOT OF CONCERNS RE: DEVELOPMENT OF FANITA RANCH. FIRST & FOREMOST IS SAFETY OF RESIDENTS. WITH TRAFFIC ALREADY NEAR CAPACITY, taking upwards of 30 min. on MAST BLVD TO ACCESS SR-52, ADDING THIS MUCH DEVELOPMENT WITHOUT MORE ~~more~~ ^{express} ~~express~~ IS AN ISSUE FOR 1ST RESPONDERS AS WELL AS RESIDENTS. NOT JUST W/ CONSIDERATION OF FIRES (THINKING OF PARADISE, CA WHERE PEOPLE WERE TRAPPED IN CARS) BUT OTHER CALLS FOR SERVICE & NAVIGATING GRIDLOCKED ROADS → W/C APPEARS TO BE MAST/MAGNOLIA AS MAIN ARTERIES.

Secondly, THERE ARE MANY ^{existing} TRAILS that have been built & maintained by MULTI-USE TRAIL USERS (~~off~~ off-road, hikers, mountain bikers, runners, birders, etc.) using current

sustainable methods and should be kept in the plan. These are single-track trails that have less of an environmental impact than the fire roads/clearance roads that also exist there. These trails are heavily used by residents, visitors, and wild life, and provide additional eyes-on-the-ground to help prevent fires, as well as additional access points for fire crews.

WHAT OTHER OPTIONS FOR WASTE DO WE HAVE? By all accounts, Sycamore landfill is too small to accommodate this kind of growth & further impact the local ecosystem (filtering into S.D. RIVER etc...)

I understand our city needs revenue, AND AS HOMEOWNER, managed growth is a positive. I'm pleading with you, however, to take a measured approach w/ the health ~~of~~ of our ecosystem & quality of life. We should focus on bringing other industry & jobs to Santee (not solely fast-food & retail). The trails are one of the #1 reasons we moved here. Being stuck in gridlocked traffic will only increase the #s of residents leaving Santee; we're already seeing our neighbors moving away in droves because of this & the rising costs ^{to live here} TWO NEW HOMES ARE TOO EXP. FOR OUR WORKING CLASS

From: Alison Liebrecht <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 4:12 PM
To: John O'Donnell
Subject: Comments on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards followed by quality of life, public safety, jobs, as I am a Santee Resident.

Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

Although it is understood some trails will be wider when adjacent to roads or within developed portions of the project the great majority of trails within fuel modifications zones and preserved areas should be narrow and nature-based. Trails should be designed to be maintained to no wider than 3 feet within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands.

The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active, healthy community. Here are a few links to provide good context of bike parks and trails for a community, making them destinations (outside revenue comes in) and more easily navigated from within: Whistler Village, British Columbia, CAN - <https://www.whistler.com/activities/biking/> Mammoth Lakes, CA - <https://www.visitmammoth.com/blogs/family-friendly-biking-mammoth-lakes> Bentonville, AR - <https://www.mtbproject.com/trail/5950735/the-slaughter-pen-blowing-springs-tour> Ox Trails (northwest AR) - <http://oztrailsnwa.com/blog/> "The increase of trail building (200 hundred miles

and counting) in Northwest Arkansas is leading to huge growth in mountain biking and bike tourism. We love that more people are finding and using our trails!"

As a resident of Santee, I am first and foremost concerned with public safety. With Traffic already near capacity and commutes from mast to the 52 W during morning rush hours taking upwards of 30 minutes to access SR52 (much like Sorrento Valley and the Del Sur community the Home Fed Developers want to mimic), adding this much development without other points of egress is a mistake for many reasons:

-As a former police officer with Chula Vista PD, when Eastlake was booming into existence, service calls would take upwards of 1 hr to drive from downtown Chula Vista (4th & F St.) to get to Eastlake during the day., and those new homeowners were higher-paying taxpayers who complained often of the lack of service to their areas.

-Think of fire safety, and think of Paradise, CA, where people who were following evacuation orders were burned in their vehicles as they fled. How will first responders navigate gridlocked roads and how will our neighbors safely evacuate? Mast/Magnolia, being the main arteries shown in the mapping you provided during the City Hall meeting, would be completely stuck. The City & State needs to address infrastructure and alternative transport issues well in advance of any new home building in this proposed area.

-I'm also concerned about waste. What other options are available? By all accounts, Sycamore Landfill is too small to accommodate this kind of growth and will negatively impact the local ecosystem (SD River and the surrounding areas it flows through).

I understand the City needs revenue, and as a homeowner, better managed growth is a positive aspect, however, we need to bring more industry to Santee beyond retail and fast food. The wages simply do not support living in this County let alone our City. We'd be creating a community that our own residents cannot afford, and, as it stands, many of our neighbors are moving out in droves because the cost of living has long outpaced wage increases. On every block I walk with my dog, so many homes are for sale or are being flipped. On the other hand, there are multiple families living in single-family homes now, more than ever, and even now they are being forced to move too. I don't see how this new housing- or even high-density residences, will help this epidemic when we're not treating the roots of the symptoms.

Thank you for taking my feedback into account on this project. I appreciate your time and consideration on all these points.

Best regards,
Alison Liebrecht

From:
Alison Liebrecht

9642 Cambury Dr.
Santee, CA 92071
8583615644

From: Litchney, Seth <Seth.Litchney@sandag.org>
Sent: Monday, December 10, 2018 3:32 PM
To: John O'Donnell
Subject: FW: SANDAG Comment Letter_Fanita Ranch
Attachments: Fanita Ranch NOP - SANDAG Comments.pdf

Dear Mr. O'Donnell,

Please see the attached comment letter on the Fanita Ranch Notice of Preparation. Please let me know if you have any questions or comments.

Seth Litchney
Senior Regional Planner

SANDAG
(619) 699-1943
401 B Street, Suite 800, San Diego, CA 92101



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401 B Street, Suite 800
 San Diego, CA 92101-4231
 (619) 699-1900
 Fax (619) 699-1905
 sandag.org

December 10, 2018

File Number 3300300

Mr. John O'Donnell
 City of Santee Development Services Department
 10601 Magnolia Avenue, Building 4
 Santee, CA 92071

Dear Mr. O'Donnell:

Subject: Fanita Ranch Notice of Preparation

Thank you for the opportunity to comment on the City of Santee's Fanita Ranch Notice of Preparation (NOP). The San Diego Association of Governments (SANDAG) is submitting comments based on the policies included in San Diego Forward: The Regional Plan (2015 Regional Plan). These policies will help provide people with more travel and housing choices, protect the environment, create healthy communities, and stimulate economic growth. SANDAG comments are submitted from a regional perspective emphasizing the need for better land use and transportation coordination.

Transportation Demand Management

Please consider incorporating transportation demand management (TDM) strategies into the Fanita Ranch Project and its accompanying Draft Revised Environmental Impact Report (EIR) to mitigate transportation impacts associated with new development. TDM strategies include infrastructure improvements to support alternatives to the private automobile and supporting programs and services that encourage alternatives to driving alone. Specific TDM measures to consider include the following:

- Given the planned network of multi-use trails, consider providing a shared fleet of Neighborhood Electric Vehicles (NEVs) for residents and community guests to reduce reliance on a personal vehicle to fulfill short trips within and around the community. SANDAG sponsored Senate Bill 1151 (Bates) to authorize any city within San Diego County to establish a NEV transportation plan.
- Actively promote carpooling and vanpooling to residents and employees. SANDAG offers a Regional Vanpool Program subsidy of up to \$400 per month for eligible vans, as well as a Carpool Incentive Program in partnership with Waze Carpool.
- Consider providing wayfinding to include kiosks that provide real-time travel and trip-planning information for regional transit services, shared mobility services, parking, and other available transportation options.

MEMBER AGENCIES

- Cities of
- Carlsbad
- Chula Vista
- Coronado
- Del Mar
- El Cajon
- Encinitas
- Escondido
- Imperial Beach
- La Mesa
- Lemon Grove
- National City
- Oceanside
- Poway
- San Diego
- San Marcos
- Santee
- Solana Beach
- Vista
- and
- County of San Diego

ADVISORY MEMBERS

- Imperial County
- California Department of Transportation
- Metropolitan Transit System
- North County Transit District
- United States Department of Defense
- San Diego Unified Port District
- San Diego County Water Authority
- Southern California Tribal Chairmen's Association
- Mexico

More information on regional TDM programs is available at iCommuteSD.com.

Electric Vehicle Planning

Please consider incorporating robust electric vehicle (EV) charging infrastructure into the Kearny Mesa Community Plan Update and Draft EIR to help mitigate greenhouse gas emission impacts while also supporting goals of the 2015 Regional Plan and the State of California for EV deployment and uptake.

SANDAG also encourages the City of Santee to utilize resources from the Plug-in San Diego (Plug-in SD) program, which implements recommendations from the San Diego Regional Plug-In Electric Vehicle Readiness Plan. Plug-in SD provides a technical expert, known as “the EV Expert,” who is available to assist stakeholders in person, via email, or by phone. SANDAG encourages City of Santee staff to contact the EV expert with any questions regarding EVs and/or EV charging stations at (866) 967-5816 or evexpert@energycenter.org.

Active Transportation

SANDAG supports the development of a robust active transportation network. SANDAG recommends that high-quality bike facilities, such as separated bikeways, be included to connect residential areas to employment, retail, school, park, and open space areas. Similarly, secure bike lockers and showers could be included at these destinations in order to encourage people to bike or walk to work. Bike parking should be located as close as possible to entrances of buildings or open spaces in highly visible areas.

Regional Housing Needs

SANDAG recognizes that the San Diego region and California are facing a severe housing crisis and that a lack of housing production has led to higher rents and housing costs, affecting residents, the business community, and overall quality of life. The Fanita Ranch project provides 2,949 total housing units. While this project assists in meeting regional housing needs, SANDAG encourages the City of Santee to continue to increase housing choices and to connect the housing to pedestrian, bicycle, and transit infrastructure.

Other Considerations

SANDAG has a number of resources that can be used for additional information or clarification on topics discussed in this letter. The following can be found at sandag.org:

- Planning and Designing for Pedestrians: Model Guidelines for the San Diego Region
- Integrating Transportation Demand Management into the Planning and Development Process
- SANDAG Regional Parking Management Toolbox
- Riding to 2050: The San Diego Regional Bike Plan
- San Diego Regional Plug-In Electric Vehicle Readiness Plan

When available, please send any additional environmental documents related to this project to:

Intergovernmental Review
c/o SANDAG
401 B Street, Suite 800
San Diego, CA 92101

SANDAG appreciates the opportunity to comment on the Fanita Ranch NOP. If you have any questions, please contact me at (619) 699-1943 or seth.litchney@sandag.org.

Sincerely,



SETH LITCHNEY
Senior Regional Planner

SLI/KHE/kwa

From: Carol Livingston <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

Although it is understood some trails will be wider when adjacent to roads or within developed portions of the project the great majority of trails within fuel modifications zones and preserved areas should be narrow and nature based. Trails should be designed to be maintained to no wider than 3 feet within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands.

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Thank you for taking my feedback into account on this project,

From:
Carol Livingston
617 Neptune Ave

Encinitas, CA 92024
+17609437036

From: David Loughlin <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
David Loughlin
3109 Courser ave

San Diego , CA 92117
8583368462

From: Cliff Luallin <cliffylu@yahoo.com>
Sent: Monday, November 26, 2018 8:28 PM
To: John O'Donnell
Subject: FANITA RANCH

Dear Mr. O'Donnell,

Please place me on the notification list for the Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you.

Cliff Luallin

10435 Chaparral Dr.

Santee, Ca 92071

email: cliffylu@yahoo.com

From: JONATHAN Major <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

PS Traffic in this area is already very heavy and more homes WILL be a burden on all current residents of the area. i e, your constituents

From:
JONATHAN Major
2512 Mulder st

Lemon grove , CA 91945
6193004176

From: rob marks <rob.marks456@yahoo.com>
Sent: Wednesday, November 28, 2018 3:07 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr O'Donnell,

Please place me on the notification list for release of the revised environmental impact report for Fanita Ranch.

Thank you,

Rob Marks

From: Marika Martinez <mmartinez@bycor.com>
Sent: Tuesday, November 27, 2018 1:38 PM
To: John O'Donnell
Subject: Fanita Ranch

As a neighbor directly affected by the potential approval of travesty known as Fanita Ranch, I request a copy of the environmental impact reports related to this project.

Please forward to me at: marika@bycor.com

A concerned citizen,
Marika Martinez
9124 Willowgrove Ave
Santee, CA 92071



Marika Martinez | Project Engineer
BYCOR General Contractors, Inc.
6490 Marindustry Place | San Diego, CA 92121
Main (858) 587-1901 | Direct (858) 362-8957 | Cell (619) 318-8959
Lic. #444203

From: Jason McDonald <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

From:
Jason McDonald
26338 Crescendo Dr

Escondido, CA 92026
7607359045

From: Sean McKelvey <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Sean McKelvey
10351 LongDale pl

San Diego , CA 92131
8587612271

From: Janet Mc <janetanmc@yahoo.com>
Sent: Sunday, November 18, 2018 9:32 PM
To: John O'Donnell
Cc: Stephen Houlahan
Subject: DREIR (SCH # 2005061118) Fanita Ranch concern

Dear John O'Donnell, Principal Planner for Santee City Council,
I request notification of all information regarding the revision of the Environmental Impact Report for the Fanita Ranch Project. I am a concerned Santee citizen and believe that there are too many environmental and quality of life impacts that scream out against the development of Fanita Ranch. Please add me to the notification list.

Please confirm that this is request will be honored.

Thank you,

Janet McLees

8805 Carmir Dr.

Santee, CA 92071

From: Jim Messick <santeehomes4u@gmail.com>
Sent: Tuesday, November 27, 2018 2:54 PM
To: John O'Donnell
Subject: Fanita Ranch

Hi John, my only question is what mandates the city of Santee has for infrastructure? Larger Sewer station, more schools, satellite fire station and the big one on everybody's mind is traffic IE more than two ways in and out of the subdivision. What about freeway 52 traffic?

Jim Messick Realtor

Kw Santee

619 403-4292

From: Tina Meyer <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Tina Meyer
P.o. box 712603

Santee, CA 92072

From: Mikhail-Fox Jacklin <jacklinmikhailfox@icloud.com>
Sent: Sunday, December 2, 2018 5:02 PM
To: John O'Donnell
Cc: Mikhail-Fox Jacklin
Subject: Fanita Ranch EIR

> Dear Mr. Donnel,

>>

>> Please add me to the notification list for the Fanita Ranch EIR. I am a homeowner in the Silver Country Estates area and have VERY strong oppositions to this large scale development that will have a direct impact on the quality of life for the residents of this neighborhood. There will be increased noise, congestion, emissions (both organic and synthetic), crime, and traffic that is already unbearable in this City. Further, there is beautiful and rare wildlife in these mountains that must be preserved and protected. I am very interested in reading the entire revised EIR and want to know what more us homeowners in this area can do to fight this project- especially where the plan includes connecting Cuyamaca street to Magnolia.

>> As an aside, I have also reached out to assemblyman Duncan Hunter's office for assistance with this matter.

>

>> Sincerely,

>>

>> Jacklin Mikhail, REHS

>> (626) 688-7477

>> 10432 Chaparral Drive, Santee

>>

>> Sent from my iPhone

From: James Miller <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
James Miller
1422 Bancroft St.

San Diego, Ca 92102

From: Mike Miller <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Mike Miller

La Mesa, CA 91942

From: Katie Molidor <katiemolidor@gmail.com>
Sent: Tuesday, November 27, 2018 8:52 AM
To: John O'Donnell
Subject: Fanita Ranch

Good Morning Mr. Donnell,

My name is Katie and I am a homeowner here in the great city of Santee. I wanted to take the time to email you this morning and let you know my thoughts on the Fanita Ranch project.

I am aware that there's a lot of push back from some of the other locals. I have been born and raised North County San Diego all my life, up until 3 years ago. I can't tell you how much my hometown, Vista, looks vastly different from what it was when I was a kid. Because of the developments the entire city has benefited. There has been fields and empty lots that I played in as a kid that were transformed into planned communities with homes \$500k+.

While it is a little bittersweet to watch this transition, and a bit laughable at times because these were areas for transients and gangs to use drugs, loiter, and other illicit activities, it is refreshing to see the happy families that now live there.

Fanita Ranch project will bring in much needed revenue. It will not be HUD or affordable housing which would lower home values and possibly bring in less responsible or invested individuals. San Diego and California in general are required to build more homes. Santee is one of the only cities that has the undeveloped land and room for growth, also the added bonus of not being required to have low income housing.

In short, I am in full support of this project. It is an opportunity for us as a city to increase our value and our image among the rest of San Diego County. We have a duty to put our best foot forward. We should be proud of our beautiful city and excited to show our ability to give a wonderful warm welcoming, that only a town with a small time feel like Santee can do.

I'm happy to share such a fantastic slice of East County with others. I'm eager to see how we can all benefit from the influx of revenue. It is time to prosper! We can't stop progress, but we can take a proactive stance on how we will address that progress and development.

I wish you the best of luck in your endeavors and hope that this town will find a happy medium/middle ground. Thank you for your continued efforts!

Regards,

Mrs. Katie Molidor

From: Kyle Montgomery <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:12 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Kyle Montgomery

Alpine, CA 91901



STATE OF CALIFORNIA
 GOVERNOR'S OFFICE of PLANNING AND RESEARCH



EDMUND G. BROWN JR.
 GOVERNOR

KEN ALEX
 DIRECTOR

Notice of Preparation

November 9, 2018

To: Reviewing Agencies

Re: Fanita Rauch
 SCH# 2005061118

Attached for your review and comment is the Notice of Preparation (NOP) for the Fanita Ranch draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

John O'Donnell
City of Santee
10601 Magnolia Avenue
Santee, CA 92071-1266

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
 Director, State Clearinghouse

RECEIVED

NOV 16 2018

Dept. of Development Services
 City of Santee

Attachments
 cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2005061118
Project Title Fanita Ranch
Lead Agency Santee, City of

Type NOP Notice of Preparation
Description Fanita Ranch would be a master planned community consisting of up to 2,949 housing units with a school, or 3,008 units without a school, up to 80,000 sf of commercial uses, parks, open space, and agriculture uses. The Santee General Plan identifies Fanita Ranch as Planned Development. A GPA would be processed concurrently with a SP to designate the Fanita Ranch project site with a SP LUD and to ensure that the Fanita Ranch project is in compliance with the city's general plan, as amended.

Note: See NOP for full description

Lead Agency Contact

Name John O'Donnell
Agency City of Santee
Phone (619) 258-4100 ext. 182 **Fax**
email
Address 10601 Magnolia Avenue
City Santee **State** CA **Zip** 92071-1266

Project Location

County San Diego
City
Region
Cross Streets Fanita Parkway and Cuyamaca Street
Lat / Long
Parcel No. various
Township **Range** **Section** **Base**

Proximity to:

Highways SR 52, SR 67
Airports Gillespie Field, MCAS Miramar
Railways No
Waterways San Diego River
Schools West Hills HS, Sycamore Canyon ES
Land Use Vacant/PD/PD

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Wildlife, Region 5; California Department of Education; Office of Emergency Services, California; Department of Housing and Community Development; Native American Heritage Commission; State Lands Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Air Resources Board; Resources, Recycling and Recovery; State Water Resources Control Board, Division of Drinking Water; Department of Toxic Substances Control; San Diego River Conservancy; Regional Water Quality Control Board, Region 9

Date Received 11/09/2018 **Start of Review** 11/09/2018 **End of Review** 12/10/2018

Note: Blanks in data fields result from insufficient information provided by lead agency.



NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT TRANSMITTAL

SCH No.: 2005061118

For U.S. Mail: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044

(916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

PROJECT TITLE				
Fanita Ranch				
LEAD AGENCY City of Santee			CONTACT PERSON John O'Donnell, Principal Planner	
STREET ADDRESS 10601 Magnolia Avenue			TELEPHONE 619-258-4100 Ext. 182	
CITY Santee	ZIP CODE 92071		COUNTY San Diego	
PROJECT LOCATION				
COUNTY San Diego		CITY/NEAREST COMMUNITY Santee		
LAT. / LONG.: Various -- see attached map " N/ " W				
CROSS STREETS Fanita Parkway and Cuyamaca Street		ZIP CODE 92071	TOTAL ACRES 2,635	
ASSESSOR'S PARCEL NO. Various -- see attached	SECTION N/A -- see legal description on attached map	TOWNSHIP N/A--see legal description on attached map	RANGE N/A--see legal description on attached map	BASE USGS Quad maps: El Cajon, La Mesa, Poway, San Vicente Reservoir
WITHIN 2 MILES: STATE HIGHWAY No. 67 and 52		WITHIN 2 MILES: WATERWAYS San Diego River		
WITHIN 2 MILES: AIRPORTS Gillespie Field, MCAS Miramar		WITHIN 2 MILES: RAILWAYS N/A		WITHIN 2 MILES: SCHOOLS West Hills High School, Sycamore Canyon Elementary School

DOCUMENT TYPE

CEQA		NEPA		OTHER	
<input checked="" type="checkbox"/>	NOP	<input type="checkbox"/>	Supplemental EIR	<input type="checkbox"/>	Joint Document
<input type="checkbox"/>	Early Cons	<input type="checkbox"/>	Subsequent EIR	<input type="checkbox"/>	Final Document
<input type="checkbox"/>	Neg Dec	<input type="checkbox"/>	(Prior SCH No.):	<input type="checkbox"/>	Draft EIS
<input type="checkbox"/>	Mit Neg Dec	<input type="checkbox"/>	Other:	<input type="checkbox"/>	FONSI
<input type="checkbox"/>	Draft EIR				

LOCAL ACTION TYPE

<input type="checkbox"/>	General Plan Update	<input checked="" type="checkbox"/>	Specific Plan	<input type="checkbox"/>	Rezone	<input type="checkbox"/>	Annexation
<input checked="" type="checkbox"/>	General Plan Amendment	<input type="checkbox"/>	Master Plan	<input type="checkbox"/>	Prezone	<input type="checkbox"/>	Redevelopment
<input type="checkbox"/>	General Plan Element	<input type="checkbox"/>	Planned Unit Development	<input type="checkbox"/>	Use Permit	<input type="checkbox"/>	Coastal Permit
<input type="checkbox"/>	Community Plan	<input type="checkbox"/>	Site Plan	<input checked="" type="checkbox"/>	Land Division (Subdivision, etc.)	<input type="checkbox"/>	Other:

DEVELOPMENT TYPE

<input checked="" type="checkbox"/>	Residential:	Units: 2,949	Acres: 380	<input type="checkbox"/>	Water Facilities:	Type:	MGD:
<input type="checkbox"/>	Office:	Sq. ft.	Acres:	Employees:	<input checked="" type="checkbox"/>	Transportation:	Type: Extension of Circulation Element Roads
<input checked="" type="checkbox"/>	Commercial:	Sq. ft. 80,000	Acres:	Employees: 263	<input type="checkbox"/>	Mining:	Mineral:
<input type="checkbox"/>	Industrial:	Sq. ft.	Acres:	Employees:	<input type="checkbox"/>	Power:	Type: MW:
<input checked="" type="checkbox"/>	Educational:	School site= 15 acres		<input type="checkbox"/>	Waste Treatment:	Type:	
<input checked="" type="checkbox"/>	Recreational:	Parks= 73 acres		<input type="checkbox"/>	Hazardous Waste:	Type:	
				<input type="checkbox"/>	Other:	Preserve = Approx.1,600 acres; Agriculture = 36 acres	

Local Public Review Period (to be filled in by lead agency):

Starting Date: November 10, 2018 Ending Date: December 10, 2018

Address where copies of the Draft EIR are available and a description of how the Draft EIR can be provided in an electronic format: N/A - This is a NOP filing.

Lead Agency (Complete if applicable):

Consulting Firm: Harris and Associates


Address: 600 B Street, Suite 2000

City/State/Zip: San Diego, CA 92101

Contact: Diane Sandman, Senior Director, Environmental Planning & Compliance

Phone: 619-481-5013

Applicant:	<u>HomeFed Fanita Rancho, LLC c/o Jeff OConnor, Director of Operations</u>
Address:	<u>1903 Wright Place, Suite 220</u>
City/State/Zip:	<u>Carlsbad, CA 92008</u>
Phone:	<u>760-918-8200</u>

Signature of Lead Agency Representative:		Date:	<u>11-5-2018</u>
--	---	-------	------------------

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

For SCH Use Only:	
Date Received at SCH	_____
Date Review Starts	_____
Date to Agencies	_____
Date to SCH	_____
Clearance Date	_____
Notes:	_____

378-140-22
378-420-65
378-420-62
378-220-04
378-210-29
378-140-03
378-210-28
378-140-25
378-220-05*
378-420-59
378-420-56
378-420-64
378-420-66
378-220-18
378-210-02
378-420-63
378-210-23
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378-220-19
378-210-24
378-220-06
378-210-13*
378-210-12

*(Parcels included in both Cuyamaca and Magnolia)

NOP Distribution List

County: *San Diego*

SCH#

2005061118

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Denise Peterson
- California Coastal Commission
Allyson Hitt
- Colorado River Board
Elsa Contreras
- Dept. of Conservation
Crina Chan
- Cal Fire
Dan Foster
- Central Valley Flood Protection Board
James Herota
- Office of Historic Preservation
Ron Parsons
- Dept of Parks & Recreation Environmental Stewardship Section
- S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck
- Dept. of Water Resources Agency
Nadell Gayou
- Fish and Game
- Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- Fish & Wildlife Region 1
Curt Babcock
- Fish & Wildlife Region 1E
Laurie Harnsberger
- Fish & Wildlife Region 2
Jeff Drongesen
- Fish & Wildlife Region 3
Craig Weightman
- Fish & Wildlife Region 4
Julie Vance
- Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Wildlife M
William Paznokas
Marine Region
- Other Departments
- California Department of Education
Lesley Taylor
- OES (Office of Emergency Services)
Monique Wilber
- Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- Dept. of General Services
Cathy Buck
Environmental Services Section
- Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division
- Independent Commissions, Boards
- Delta Protection Commission
Erik Vink
- Delta Stewardship Council
Anthony Navasero
- California Energy Commission
Eric Knight

- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission Supervisor
- Santa Monica Bay Restoration
Guangyu Wang
- State Lands Commission
Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
Cherry Jacques
- Cal State Transportation Agency CalSTA
- Caltrans - Division of Aeronautics
Philip Crimmins
- Caltrans - Planning HQ LD-IGR
Christian Bushong
- California Highway Patrol
Suzann Ikeuchi
Office of Special Projects
- Dept. of Transportation
- Caltrans, District 1
Rex Jackman
- Caltrans, District 2
Marcelino Gonzalez
- Caltrans, District 3
Susan Zanchi
- Caltrans, District 4
Patricia Maurice
- Caltrans, District 5
Larry Newland
- Caltrans, District 6
Michael Navarro
- Caltrans, District 7
Dianna Watson
- Caltrans, District 8
Mark Roberts

- Caltrans, District 9
Gayle Rosander
- Caltrans, District 10
Tom Dumas
- Caltrans, District 11
Jacob Armstrong
- Caltrans, District 12
Maureen El Harake
- Cal EPA
- Air Resources Board
- Airport & Freight
Jack Wursten
- Transportation Projects
Nesamani Kalandiyyur
- Industrial/Energy Projects
Mike Tollstrup
- California Department of Resources, Recycling & Recovery
Kevin Taylor/Jeff Esquivel
- State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water
- State Water Resources Control Board
Div. Drinking Water # _____
- State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- State Water Resources Control Board
Phil Crader
Division of Water Rights
- Dept. of Toxic Substances Control Reg. # _____
CEQA Tracking Center
- Department of Pesticide Regulation
CEQA Coordinator

- Regional Water Quality Control Board (RWQCB)
- RWQCB 1
Cathleen Hudson
North Coast Region (1)
- RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB 3
Central Coast Region (3)
- RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S
Central Valley Region (5)
- RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- RWQCB 6
Lahontan Region (6)
- RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7
Colorado River Basin Region (7)
- RWQCB 8
Santa Ana Region (8)
- RWQCB 9
San Diego Region (9)
- Other _____

San Diego
Conservancy

From: Jerry Moseley <killshot308@gmail.com>
Sent: Wednesday, November 28, 2018 2:57 PM
To: John O'Donnell
Subject: Fanita Ranch

Hi John,

I am told that you are the person who can provide the Environmental Impact Reports for the Fanita Ranch project. Would it be possible to get a copy please?

I am out of town and will not be able to attend the meeting tomorrow regarding this project, but I am wondering a couple of things. I don't know if you would be able to address them, or possibly ask for me at the meeting?

- 1) Given that traffic in Santee is already horrendous, what is the plan to mitigate all of the additional traffic?

- 2) There is only 1 decent grocery store in Santee (Vons) that is overrun most of the time, what is the plan to attract additional commercial tenants such as these?

- 3) Santee seems to be desperately trying to catch up to El Cajon, in terms of adding to urban squalor (see above points). What, if any, upside is there to folks who live in the area to adding to the congestion, noise, grime, homeless, and overall decline in the quality of the city?

- 4) Santee already seems to have its hands full trying to manage its current situation, why add to it?

and finally, (this question has been plaguing me for quite some time)

5) With all of the water and electricity restrictions we see in the summer months, with the utility infrastructure already under tremendous load without the ability to add capacity....how does anyone justify the addition of 3,000 new homes? It would seem that this will make a situation that is already barely manageable, worse.

Thank you for your time and consideration.

-Jerry

From: josh mundt <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:31 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
josh mundt
8558 Tommy Dr.

san diego, CA 92119
6196543709

FEEDBACK FORM

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Name: Sean Murphy Date: 11/29/18

Some of San Diego's most fun
MTRB trails are up by The
Vinyard Village. SAD 😞 Please
collaborate with San Diego Mountain Bike Assn
to keep some legit trails.

From: Susie Murphy <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:12 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Susie Murphy
718 Elm Ave

Chula Vista, CA 91910
6193161757

From: James Murren <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
James Murren

SAN DIEGO, CA 92115

From: Thomas Myrick <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Bikers will bring money to your city.

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Thomas Myrick
1906 Summit Drive

Escondido, CA 92027
7574030446

From: Jonathan Naguit <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Greetings!

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Jonathan Naguit
708 Ridgemont Circle

Escondido, CA 92027
7602337896

From: john nobil <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

*community trails matter!

People from all over sandiego find great value in outdoor access. in this time of increasing health problems and overuse of technology the value of outdoor exercise couldnâ€™t be higher.

thanks for your consideration

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
john nobil

1547 calle de primra
la jolla , CA 92037
8584054221

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

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Name: John Olsen Date: 11/29/18

When will the SR 125 be completed?

From: Landon Pann <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Landon Pann
16762 Lawson Valley road

Jamul, CA 91935
6199711797

From: Pat Parmer <pparmer341@yahoo.com>
Sent: Tuesday, November 27, 2018 4:56 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you,

Pat Parmer

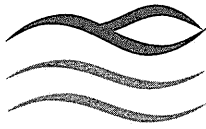
From: Scott Parmer <sparmer300@yahoo.com>
Sent: Wednesday, November 28, 2018 10:15 AM
To: John O'Donnell
Subject: Environmental Impact Report

Dear Mr. O'Donnell

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thanks,

Scott Parmer



An Everyday Essential

PADRE DAM
Municipal Water District

December 10, 2018

John O'Donnell, Principal Planner
City of Santee
Department of Development Services
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

SUBJECT: RESPONSE TO THE NOTICE OF PREPARATION OF A DRAFT REVISED ENVIRONMENTAL IMPACT REPORT FOR FANITA RANCH PROJECT (SCH#2005061118) FROM PADRE DAM MUNICIPAL WATER DISTRICT (PDMWD JN 204020)

Thank you for the opportunity to provide comments to the Notice of Preparation (NOP) of a Draft Revised Environmental Impact Report (EIR) for the Fanita Ranch Project. Padre Dam Municipal Water District's (Padre Dam) comments for consideration in the EIR are provided in this letter.

General Comments:

- A new entrance to the Water Recycling Facility (WRF) will be required off of the extension of Fanita Parkway. A stop sign, turn lane, or signal may be required to accommodate vehicles entering or leaving the facility.
- A water, sewer, and recycled water study has been completed and the findings must be included in the EIR including reservoir sizing, pump station sizing, and mainline sizing.
- A water supply assessment (WAS) has been completed and must be included in the EIR.
- Tertiary treated recycled water (Recycled Water) will not be available for the irrigation for this project. Padre Dam's plan to recycle all remaining wastewater for the East County Advanced Water Purification (AWP) Project that will create a local sustainable potable water supply for East County.
- Recycled Water will be available for construction and dust control on a limited and potentially seasonal basis. The amounts available will be determined in the Study.
- Slope Irrigation shall be temporary for establishment only wherever possible.
- A water main extension will be required in Magnolia Avenue and will tie into the proposed main extension in Cuyamaca Street. Sizing will be determined by the Study.
- A water main extension will be required in Fanita Parkway and will need to tie into the Carlton Hills Reservoir. This pipeline will be on the 880 pressure zone and will loop through the Project and tie to the Magnolia Pressure zone system in Cuyamaca Street.

BOARD OF DIRECTORS
Douglas S. Wilson
Augie Scalzitti
Bill Pommering
August A. Caires
James Peasley

PO Box 719003
Santee, CA 92072
9300 Fanita Parkway
Santee, CA 92071
619 448 3111
www.padredam.org

- A pump station will be required near the Carlton Hills reservoir to supply the Project. The pump station must be capable of providing full fire flow and have an additional pump as well as a backup generator.
- On site reservoirs shall be designed for 1 hour fire storage and sizing will be determined by the Study.
- All single family residential homes that are served fire sprinklers through the public water meter will be required to have a backflow protection per the requirements of Padre Dam. The backflow shall be tested prior to the start of service and annually thereafter by an authorized tester paid for by the home owner or Home Owners Association.
- Multifamily, school, and commercial sites shall have private onsite water and sewer systems including separate domestic and fire systems. Domestic service shall be from master meters in public right of way. Above ground reduced pressure back flow devices shall be required at both the fire and domestic connections.
- Sewer main with slopes greater than 10% will require odor control measures and lined manholes.
- Sewer mains with slopes greater than 15% require special review and approval from Padre Dam's Director of Engineering.
- Sewer mains shall not be greater than 14 feet deep.
- The existing sewer force main on the West side of Fanita Parkway will require an easement.
- Easements will be required over all pipelines outside of proposed right of way.
- The WRF currently uses gaseous chlorine to disinfect recycled water. Please verify required separation from the school, residential homes, multifamily homes, and the adult community area. If proper separation can't be achieved then the Project will be required to mitigate the use of the gaseous chlorine.
- Water and sewer mains onsite must meet all separation criteria provided in the Water Agency Standards.
- Roundabouts will require special design for water and sewer mains. Water and sewer can't be under any roundabout center median.
- The sewer headworks facility shall be located immediately adjacent to the WRF on a separate lot that shall be dedicated to Padre Dam. The lot shall be 100 foot wide by 200 foot long along the northern end of the eastern boundary. An additional pipeline and pump is required as part of the head works to bypass sewer flow when maintenance to the WRF is required. Sewer headworks facility will be required to have a backup generator onsite.
- All pump stations shall be designed with an onsite generator.

Santee Lakes:

- Any disruption to the camping experience at Santee Lakes will result in a significant loss of revenue and greatly impact our ability to remain self-sufficient. Santee Lakes requires construction and operation mitigation measures incorporated in the Fanita Ranch Project design to reduce impacts.

- Roadway traffic noise on Fanita Parkway adjacent to the campground must be mitigated. Mitigation measures shall include up to but not limited to the use of noise barriers such as sound walls, limitation of vehicle speeds, possible roadway surface alternations, limitation of vehicle size, and use of traffic control measures to reduce breaking and acceleration.
- A new entrance shall be provided along the extension of Fanita Parkway in front of Pond C for the Santee Lakes Campground.
- Flooding from Fanita Parkway on the west side of the channel into Santee Lakes must be mitigated. Mitigation measures shall include up to but not limited to flood walls or an enclosed storm drain system.
- A traffic control measure must be included at the camper entrance including but not limited to a stop sign, turn lane or traffic signal.

Please contact me at (619) 258-4640, if you have any questions.

PADRE DAM MUNICIPAL WATER DISTRICT

A handwritten signature in black ink, appearing to read 'CMAEL', written in a cursive style.

Courtney Mael
Engineering Manager
Development and Construction

CM:cc

FEEDBACK FORM

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Name: Michèle Perchez

Date: 11-29-18

Concerns for adequate evacuation of all impacted area → north central, north eastern Santee WHEN fires occur.

Also, strategies for fire preparation of homes — building materials, landscape, etc.

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Name: Michele Perchez Date: 11-29-18

Provide feasibility of OPEN SPACE
ALTERNATIVE

From: michele perchez <mperchez5@gmail.com>
Sent: Monday, December 10, 2018 5:23 PM
To: John O'Donnell
Subject: RE: Fanita Ranch Revised Environmental Impact Report

Dear Mr O'Donnell,

1) Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

2) Please enter my recommendations for the Revised EIR for the current proposed project into the public record:

An open space preserve is the best and highest use for the property, as it maintains a safe buffer zone from wildland fires, which as we currently have witnessed, are becoming much more unpredictable and provide a high risk for our entire Santee community. Preserving the property as open space would also maintain current critical wildlife corridors, helping to maintain the healthiest wildlife populations by reducing fragmentation of habitat. Several critical species inhabit the area, thus there are no suitable mitigations for loss of members of these species during the construction and occupation phases of the project.

My suggestion for the Open Space Alternative, includes development of a Interpretative Nature Center complex instead of homes. All Santee schools can participate in outdoor science programs, including monitoring of native species. Private citizens can also participate in the species monitoring programs. A fee can be charged for entrance, and a citizen-based ranger unit can patrol the property to make sure visitors stay on paths, homeless don't set up camp, etc.

Thank you for your time,

Michele Perchez

Carreta Drive

From: Walter Pershing <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Walter Pershing
8723 Weston Rd

Santee, CA 92071
6193131526

From: Jonathan Peverall <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:05 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project.

From:
Jonathan Peverall
12230 Nugget CT
Lakeside , CA 92040
8134763077

From: Chris Pickford <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:31 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Chris Pickford
12269 Calle Albara Apt 2

El Cajon, CA 92019
6195314437

From: Daniel Pitard <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Daniel Pitard
4550 Nebo Dr

La Mesa , CA 91941
6196720783

From: Laura Poore <poorelm@yahoo.com>
Sent: Tuesday, November 27, 2018 9:31 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr O'Donnell-

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you.

Laura Poore

Sent from my iPhone

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: Kathryn Prescott Date: 11-29-18

As a homeowner in the vicinity of this project, I cannot see how this can be allowed without construction of new major roads in and out of the area.

Santee is very congested as is, and this development and the impact it would have on traffic alone would make our family seriously consider moving out of our beloved city. In the event of a major emergency such as wildfire, this could be/would be extremely dangerous.

Request Notification of Impacts!!!

FANITA RANCH (2,949-units) approval process was initiated November 10, 2018

Immediately send the following request to Santee Planner jodonnell@cityofsantee.ca.gov

"Dear Mr O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report
Fanita Ranch."

JOIN Preserve Wild Santee Facebook page for key updates!

From: Michelle Racicot <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of my/our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, health and education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Michelle Racicot
4726 Soria Drive

San Diego, CA 92115
8589229426

From: Erasmo Ramos <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:31 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project.

From:
Erasmo Ramos
8831 Ildica St.

Spring Valley, CA 91977
4132144621

From: Michael Ranson <michaellranson@gmail.com>
Sent: Monday, December 10, 2018 2:58 PM
To: John O'Donnell
Subject: Fanita Ranch EIR

Hi John,

I would like to make certain that all environmental issues regarding the expansion of Fanita Parkway are covered in the EI report. Fanita Parkway will be growing from a two lane road to possibly a four lane road. An entire new road will be constructed from Ganley north to the project.

It is my understanding that the current proposal is to have a three lane Fanita Parkway from Lake Canyon north to project site. One lane going in, two lanes out but with one of those lanes only being used in an emergency situation. I learned this at the scoping meeting and I think this is the best option.

Based on this scenario, I have the following questions that I would like included in the EIR if applicable.

1. Noise from traffic. A study on potential noise level increases should be done along with recommendations for mitigating the increased traffic noise. The study should include impacts to residents living along Fanita Parkway as well as impacts on Santee Lakes and campground. Santee Lakes is home to a large amount of wildlife and consideration should be given the possible impacts on the preserve.

2. Speed limit on Fanita Parkway. Is it appropriate to study potentially lowering the speed limit to mitigate impacts to the surrounding environment.

3. Lighting along the new Fanita Parkway and throughout project. Consideration should be given to using "dark sky" street lighting to minimize light pollution. <https://www.darksky.org>

4. New landscaping along Fanita Parkway should not impede existing views from homes along the road.

5. Division between back of homeowners property and Fanita Parkway. As part of the Fanita Parkway expansion, Home Fed will likely construct a uniform fence or wall running parallel to Fanita Parkway. I would like to see options for this included in the EIR if appropriate. Because it is really not determined yet what this division will be, it is a bit of a challenge to know what to ask for. Will it be a fence (similar to Santee Lakes black chain link fence) or a block wall at street level, or part block with glass or iron? How will Home Fed coordinate the construction of this dividing line with homeowners? Nearly every homeowner along Fanita Parkway has a different back property fence or wall. Some homeowners are at street level and others (like our home) are above existing street level with view of the lakes and campground.

6. Lastly, how will it be insured that the second lane out is actually only used for emergencies? I ask because if this is not enforced by some method, it is very likely that the second lane will be used regularly by people leaving Fanita Ranch. This of course would lead to much more traffic, noise etc than is being proposed and studied in this EIR. I think the question of how does the city make certain the second lane out is only used in case of an evacuation or other emergency should be addressed in this study.

Please keep in mind that all of my input above is based on a 3 lane Fanita Parkway. If it is determined that it is necessary to widen Fanita Parkway to 4 lanes from Mast Blvd to the project site, an entirely new study on those impacts should be done.

Thank you and feel free to reach out if needed.

Sincerely,

Michael Ranson

From: Ben Raymond <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 2:42 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Ben Raymond
3037 W Canyon Ave

San Diego, CA 92123-5422
6195713514

From: John O'Donnell
Sent: Thursday, December 6, 2018 11:48 AM
To: Rudy Reyes (rreyes2777@gmail.com)
Subject: Scoping Meeting (11-29-2018)

Mr. Reyes:

The City recognizes that public participation is an essential part of the CEQA process. The format of the public scoping meeting held by the City for the Fanita Ranch Project on November 29, 2018 complied with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21083.9 and accompanying regulations, State CEQA Guidelines section 15082(c). City staff and the consultant responsible for preparing the Draft Revised Environmental Impact Report ("EIR") for the Project were available at the meeting to gather input from members of the public, agencies, and tribes regarding the scope and the content of environmental information for the Draft Revised EIR.

A lead agency is not required to hold a public hearing to receive comments on a draft EIR. State CEQA Guidelines section 15202, subdivision (a), states "CEQA does not require formal hearings at any stage of the environmental review process. Public comments may be restricted to written communications." The City will hold a public hearing on its decision as to whether or not to approve the project, however, and will include the Final Revised EIR (when available) as one of the subjects for the hearing pursuant to State CEQA Guidelines section 15202, subdivision (b).

John O'Donnell | AICP | Principal Planner
(619) 258-4100, Extension 182
City of Santee | 10601 Magnolia Avenue
Santee, CA 92071

From: Marni Borg <mborg@CityofSanteeCa.gov>
Sent: Thursday, November 15, 2018 12:38 PM
To: Diane Sandman
Subject: FW: Fanita ranch draft revised EIR

From: John O'Donnell
Sent: Tuesday, November 13, 2018 5:17 PM
To: Marni Borg
Cc: Melanie Kush
Subject: FW: Fanita ranch draft revised EIR

John O'Donnell | AICP | Principal Planner
(619) 258-4100, Extension 182
City of Santee | 10601 Magnolia Avenue
Santee, CA 92071

From: Rudy Reyes [<mailto:rreyes2777@gmail.com>]
Sent: Tuesday, November 13, 2018 10:24 AM
To: John O'Donnell
Subject: Fanita ranch draft revised EIR

As per our conversation, I'm asking to be involved in the Fanita ranch EIR. Specifically the cultural resources, as they are listed as confidential and as a archaeologist they should be made available to distinguish the mitigation necessary. To hide this from the public is disingenuous and potentially litigious.

As an archaeologist, we need the environmental impact reports to make decisions as to mitigation on a site. That information needs to be made available to public so that archaeologists have a chance to review and determine whether or not the changes being made to the area are significant for mitigation.

I am simply asking that I be added to the list and that that confidential information be made available to the public. So that we can help in distinguish the significance of cultural resources found and whether or not medication is necessary.

Rudy Reyes
619-767-8025

--

Sent from Gmail Mobile

From: Rudy Reyes <rreyes2777@gmail.com>
Sent: Monday, December 3, 2018 11:30 AM
To: John O'Donnell
Subject: Fanita ranch draft revised eir scoping for public comments

I have my degrees in archaeology and have worked on various other archaeological projects in regards to santee city. As I understand the EIR requires scoping for public comment. These ers are supported by state and federal laws and are a requirement.

At the last meeting for the Fanita ranch project, public comment was not considered nor taken. Unfortunately this is a requirement under state and federal laws, and that means that the last meeting was not valid nor a legal EIR scoping meeting at all. In order to be considered a e I r scoping meeting public comments must be taken and considered. Since that step was not taken at the prior meeting I would argue that that meeting was not a legal development meeting under the public comments requirements of the eir.

Please take my concerns to the city council's attorney for clarification. As the lead agency its your responsibility to have public input at this stage.

Rudy Reyes
619-767-8025

From: Rudy Reyes <rreyes2777@gmail.com>
Sent: Monday, December 3, 2018 2:43 PM
To: John O'Donnell
Subject: Re: Scoping Meeing 11-29-2018

No you did not take public comment at the recent meeting... I watched via internet video. These emails I'm currently sending are not considered public comment?

On Monday, December 3, 2018, John O'Donnell <jodonnell@cityofsanteca.gov> wrote:

Mr. Reyes,

As a reminder we are taking public input during the entire period as identified in the Notice of Preparation and we also took public comments at the Scoping Meeting. I did not see your name on the sign-in list of the 11-29-2018 meeting. If you did not provide your comments, please submit as soon as possible.

Thank you,

John O'Donnell | AICP | Principal Planner

(619) 258-4100, Extension 182

City of Santee | [10601 Magnolia Avenue](#)

[Santee, CA 92071](#)

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Rudy Reyes
619-767-8025

--

Sent from Gmail Mobile

From: Julie Riklin <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

To Whom This May Concern: Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards followed by quality of life, public safety, and traffic.

Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future. Already open space was taken away by new housing.

Although it is understood some trails will be wider when adjacent to roads or within developed portions of the project the great majority of trails within fuel modifications zones and preserved areas should be narrow and nature-based. Trails should be designed to be maintained to no wider than 3 feet within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands.

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and counting) in Northwest Arkansas is leading to huge growth in mountain biking and bike tourism. We love that more people are finding and using our trails!"

I am also concerned with public safety and traffic. With traffic already near capacity and commutes from mast to the 52 W during morning rush hours taking upwards of 30 minutes to access SR52 (much like Sorrento Valley and the Del Sur community the Home Fed Developers want to mimic), adding this much development without other points of egress is a mistake and will make matters worse. Added time spent commuting takes away from the quality of life.

Thank you for taking my feedback into account on this project. I appreciate your time and consideration on all these points.

Best regards,
Julie Riklin

From:
Julie Riklin
9645 Stonecrest Blvd
San Diego, CA 92123
6193007325

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteca.gov.

Name: Kirk Riley Date: 11/29/18

My two big concerns:

- 1) 3,000 homes = 6K plus cars, in case of fire evacuation, that's way too many for two roads out to handle
- 2) The existing hiking and mountain bike trails are a ^{true} community resource that existing neighbors and community members cherish and really make Santee a great destination outdoor area.

From: Jodie Rock <no-reply@memberleap.com>
Sent: Friday, November 30, 2018 3:11 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Jodie Rock
4110 Texas St

San Diego , CA 92104
3605108195

From: Trevor Rose <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Trevor Rose
1769 pepperwood dr

El Cajon, CA 92021
619-307-3856



San Diego County Archaeological Society, Inc.

Environmental Review Committee

19 November 2018

RECEIVED

NOV 21 2018

To: Mr. John O'Donnell, Principal Planner
Development Services Department
City of Santee
10601 Magnolia Avenue, Building 4
Santee, California 92071

Dept. of Development Services
City of Santee

Subject: Notice of Preparation of a Draft Revised Environmental Impact Report
Fanita Ranch Project

Dear Mr. O'Donnell:


Thank you for the Notice of Preparation for the subject project, received by this Society last week.

We are pleased to note the inclusion of cultural resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

We note that the intent is to include cultural resources studies as a confidential report that will not be included in the EIR. We request that the City have the consultant prepare the report with separate confidential appendices, as is the normal contemporary practice. That permits the interested public review and understand the project's impacts on the resources.

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: SDCAS President
File

From: Ryen Russo <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Ryen Russo
12945 Grimsley Ave

Poway, CA 92064
8589453282

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



November 20, 2018

John O' Donnell
City of Santee
10601 Magnolia Avenue
Santee, CA 92071-1266

RECEIVED

NOV 26 2018

Dept. of Development Services
City of Santee

RE: SCH# 2005061118 Fanita Ranch Project, San Diego County

Dear Mr. O' Donnell:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,



for

Katy Sanchez
Associate Environmental Planner

cc: State Clearinghouse

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: Sandy Schielke Date: 11/29/2018

Provide open space alternative.

December 6, 2018

Attn: John O'Donnell, Principal Planner
Fanita Ranch Project

N.D.P. Draft Revised Environmental Impact Report
SCH # 2005061118

As the lead agency the City of Santee should be alert to the red flags of this Fanita Ranch project.

The City of Santee does not have the infrastructure to manage a community of this large of a development in addition to our existing residents.

The developer has presented a fantasy-land of carefree areas that will not be built without a HUGE negative impact upon the existing Santee community, environment and wildlife.

RECEIVED
DEC 10 2018
BY: _____

page 2

2,949 housing units

3,008 units without a school

up to 80,000 commercial use

X No General Plan Amendment

No too many homes

No Commercial use

pg 3

Fanita Commons Orchard Village
Vingard Village

X a Habitat Preserve corridor is a poor attempt to protect wild life, with roads surrounding it.

p3

"Open Space within the Habitat Preserve would be dedicated to the Multiple Species Conservation Program (MSCP) Subarea Plan Preserve currently being prepared by the City..." for long term preservation and management.

X This is being prepared and managed by whom? ? ? !

pg 4 NOP

Off-Site Improvements

Extending our existing roads for the benefit of the developer to provide access to this ill-planned development is not an improvement.

Fanita Parkway

Cuyamaca

Magnolia

extreme overload of our local roads that can not be mitigated by any widening of exits or onramps to the 52 freeway or other false ideas.

pg 5 NOP

grading and BLASTING, aggregate plants for rock crushing
 what about the danger of causing EARTHQUAKES?

Danger to wildlife?

pg 5 NOP

PDMWD 2 new storage reservoirs

3 pump stations

PDMWD may provide recycled water to Fanita Ranch for construction purposes on a limited and seasonal basis

X Okay so where is all the water coming from for farming, orchards and vineyards?

X PDMWD ^{would also provide} sewer system for Fanita Ranch — and who will be paying for that? as existing customers?

new fire station

X who will pay for the continuing services after the developer takes their money and leaves?

X How can anyone possibly believe this development is not in extreme danger of being destroyed by fire?

There is an obvious lack of thought in this Fanita Ranch plan due to the destruction of native life, plants and habitat and hills and valleys standing for hundreds of years.

There is no thought to how an enormous fire or earthquake would affect the existing ^{welfare} of current Sante citizens or evacuation thereof.

If Fanita Ranch residents try to escape disaster, flooding traffic onto Fanita Parkway, Cuyamaca, Magnolia, Mast Blvd, plus the community west of Sante Lakes tries to evacuate, everyone will be trapped and no one will get out.

A police (storefront) is not enough to keep the peace with this large of a development.

X minimum 22,048 more vehicles every day coming into state 6
2,949 housing units - 8,847 cars or vehicles x 2 trips
X minimum 17,694 trips per day
or 3,008 without a school - 9,024 vehicles x 2 trips
X 18,048 trips per day
averaging 3 cars per household

plus delivery vehicles constantly 1000
to the homes x 2000 trips per day

plus construction workers 500 to 1000
x 1000 trips per day

plus workers to grade the land 500 to 1000

build roads x 1000 trips per day
haul in materials
haul out trash

X Traffic would not be mitigated to a healthy level for living.
Light pollution 24 hrs a day.

X Air quality would not be acceptable

X Noise dirt dust clouds and the possibility of valley fever presents more health risks.

Danger to children going to school

Traffic is already heavy at magnolia and mast,

Fanita Parkway and Mast and

Cuyamaca and Mast. Children stand with heavy books ^{waiting to} cross ^{at} those lights ⁱⁿ addition 22,000 vehicles is a hazard to the community.

The access to our back properties on Strathmore would also be in question.

It is already difficult for some to maintain ~~our~~ properties with the gates at Banley and getting passage.

The general plan should not be changed. Our laws should not be changed to accommodate a BAD DEVELOPMENT PLAN for our city.

Sandy Schielke

From: Kim <kmpolo15@aol.com>
Sent: Wednesday, November 21, 2018 4:50 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Kim Schoff

Sent from my iPhone

From: Mike Schoff <mikeschoff@hotmail.com>
Sent: Wednesday, November 21, 2018 4:49 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell,

Please place me on the notification list for release of the revised environmental impact report for Fanita Ranch. Thanks.

- Mike

From: Lori Scribner <lori@scribnercomm.com>
Sent: Thursday, November 29, 2018 8:20 AM
To: John O'Donnell
Subject: Fanita Ranch - Impact Report

Hello:

I'm a citizen of Santee and concerned about the impact the Fanita Ranch project will make on our community,. I would like to receive notifications of the environmental impact reports related to this project.

Thank you,

Lori Scribner





State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 10, 2018

Mr. John O'Donnell, Senior Planner
City of Santee Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

Subject: Comments on the Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California (SCH# 2005061118)

Dear Mr. O'Donnell:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) dated November 9, 2018, for the Fanita Ranch Project (Project). The following statements and comments have been prepared pursuant to the Department's authority as a Trustee Agency with jurisdiction over natural resources affected by the Project (California Environmental Quality Act [CEQA] Guidelines § 15386), and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed Project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of Santee (City) participates in the NCCP program through preparation of a draft Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

The 2,635-acre Project site is located north of State Route 52 and west of State Route 67 in San Diego County. It is bordered to the west by open space lands owned by the Marine Corps Air Station Miramar and Padre Dam Municipal Water District, to the north and west by open space lands owned by the County of San Diego Parks and Recreation Department, and to the south and east by a mix of residential development and undeveloped lands. The proposed Project consists of 2,949 housing units with a school or 3,008 housing units without a school, up to 80,000 square feet of commercial uses, parks, open space, trails, and agricultural uses. A General Plan Amendment would be required as the City's current General Plan guidelines only allow the development of approximately 1,300 residential units on the Project site.

Consistent with NCCP guidance, the Department has been working with the City to develop an MSCP draft Subarea Plan, and as part of this process, the Department has reviewed and provided the Project applicant comments on the proposed Project. In part this is because the Habitat Preserve associated with the Project is a critical component of the City's proposed Subarea Plan Preserve. In 2016, per a request from the City and the Project applicant, the Department and the U.S. Fish and Wildlife Service (collectively the Wildlife Agencies) reviewed the maps of the then most recent proposed Project footprint, which was provided by the Project applicant, along with relevant biological information previously provided or in our administrative records. Based on this review, the Wildlife Agencies then provided written comments and recommendations to the City in a joint letter dated December 20, 2016. These recommendations were focused on addressing regional, area-wide, and City-wide protection and management of natural wildlife diversity, the proposed Covered Species under the draft

Subarea Plan, and overall reserve design for the proposed Project. Our review and the subsequent recommendations were a preliminary assessment of whether the proposed Project would meet permit issuance criteria pursuant to section 10(a)(1)(B) of the ESA of 1973, as amended (16 U.S.C. 1531 et seq.), and findings pursuant to the NCCP Act of 1991. Our letter further attempted to identify areas of particular concern that must be addressed so that the Department can make findings for issuance of the NCCP Permit to the City. In addition, as stated in the December 20, 2016 letter, the Department continues to advocate for the City, Wildlife Agencies, Project applicant and their representatives to meet and work together to develop viable Project alternatives that can be brought forward in the forthcoming Draft Revised Environmental Impact Report (Draft EIR) and ensure that the requirements of the City's Subarea Plan (and proposed list of Covered Species) will meet the issuance criteria for an NCCP.

Based on a comparison of the maps provided in 2016 with those included in the current Project NOP, the Project footprint and configuration of general open space areas, aside from the potential addition of new trails, is similar to what was proposed in that 2016 map. Therefore, the Department includes only a summary below of the previous recommendations, but requests all previous comments and recommendations provided in the December 20, 2016 letter be considered by the City when preparing Project alternatives for the Draft EIR:

1. Consolidate proposed development into a single polygon located largely in the southern portion of the site. This would reduce the amount of new development edge adjacent to existing and proposed natural areas by eliminating "island" or "peninsula" types of development zones and fragmentation associated with infrastructure within surrounding natural areas.
2. By consolidating development and conserving large contiguous blocks of Habitat Preserve, this helps to lessen indirect effects associated with the urban edge, also known as "edge effects." As proposed, the Habitat Preserve associated with the Project would consist of one relatively large polygon in the southwestern portion of the site, but it would be surrounded by residential development. In addition, it would be completely fragmented by a complex trail network. Based on calculations we made in 2016, about 930 acres (57 percent) of the 1,641-acre proposed Habitat Preserve would be subject to indirect edge effects.
3. Habitat Preserve areas should be contiguous across the property and connect to surrounding open space areas through functional linkages. Fragmentation of the Habitat Preserve areas by infrastructure such as roads should be avoided and/or minimized to the maximum extent practicable. Further consider use of single-loaded roads to reduce edge effects from housing back yards and to provide an increased area from which fire fighting activities can be conducted, as necessary.
4. Proposed Project development should be sited closer to existing development in Santee in the southern portion of the site. This configuration would effectively provide for more inherent protection of new development from wildland fire (reducing concerns and conflicts regarding natural fire in reserve areas) and much more effectively ensure/accommodate natural fire frequencies within the Habitat Preserve.

5. The proposed Project should provide improved conservation of habitats used by coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot toad, through increasing the acreages of respective habitats conserved that would not be subject to proposed construction or ongoing operational disturbance, modified natural fire cycles, edge effects, and/or fragmentation.
6. Proposed development and the Habitat Preserve should be fully buffered from each other using: fuel modification and stormwater detention zones with native landscaping, passive use areas such as strip parks with minimal irrigation, single-loaded roads, and peripheral trails. All buffer areas should be unlit; adjacent development/road areas should have minimized lighting that is directed and shielded away from buffer zones and natural areas.
7. The main east-west running riparian drainage through the Project site should be fully conserved (i.e., rim-to-rim), managed for ecosystem functions and as a wildlife movement corridor, and be buffered, as described above.
8. Vernal pools and their watersheds should be avoided to the maximum extent practicable and retained in the Habitat Preserve. High-function vernal pools and their watersheds should be avoided and conserved. Moderate function vernal pools on site should be restored or enhanced, as practicable.
9. A thorough assessment should be made of the western spadefoot including locations of all breeding pools and ensure this species will be provided sufficient habitat to support viable populations within the Santee Subarea Plan.

Although the NOP states that the Project's Habitat Preserve would be dedicated to the City's Subarea Plan Preserve, a final Subarea Plan is not yet completed nor permitted, and the NOP does not indicate if the Project applicant intends to seek incidental take coverage for listed/sensitive species through the City's Subarea Plan. The Department recommends the Draft EIR identify whether the proposed Project will be included as a "Covered Project" in the City's draft Subarea Plan with incidental take coverage proposed under the Plan. The Department would strongly support the proposed Project being a Covered Project, and the finalization of the City's Subarea Plan.

However, if the configuration of the Project's Habitat Preserve is not modified from what is presented in the NOP, then the Department requests that the Draft EIR address the following: 1) how the proposed configuration and perpetual management/monitoring of the Habitat Preserve would benefit the "Covered Species" proposed in the City's draft Subarea Plan; 2) how the Project's Habitat Preserve, with 35 acres of proposed regional trails, would adequately avoid, minimize and mitigate impacts to listed and sensitive species; 3) how the Habitat Preserve, which as currently designed would be subjected to indirect edge effects on at least 57 percent of its extent (approximately 930 acres), would adequately avoid, minimize, and mitigate impacts to listed and sensitive species; 4) how the Habitat Preserve would be managed, including identification of management funding, the proposed land manager, and the proposed land protection instrument that will provide in-perpetuity protection of the sensitive resources; 5) whether the proposed Open Space areas, which consist of brush management areas, detention basins, trails heads, and riparian areas managed by the Homeowners Association, are proposed mitigation for Project impacts to listed and sensitive species, and if so, what will be the

Mr. John O'Donnell, Senior Planner
City of Santee Development Services Department
December 10, 2018
Page 4 of 4

benefit of such management and how it will be accomplished; 6) detailed information on the proposed wildlife crossings that indicates how functionality would be achieved; 7) detailed information regarding the proposed "off-site" improvements; 8) explanation of the terms primitive and native trail system, width/length of the proposed trails, and types of proposed recreational opportunities (types of uses) within the proposed Habitat Preserve; and 9) identification of areas proposed to be restored with native vegetation communities/habitats and methods to be used in pursuit of that goal.

As stated previously, the Department continues to be available to work with the City and the Project applicant on a Project footprint/Habitat Preserve configuration that would fully minimize and mitigate the loss of the habitats and species proposed for coverage under the City's draft Subarea Plan. Thank you for the opportunity to comment on the Project NOP. If you have any questions or comments regarding this letter, please contact David Mayer at (858) 467-4234 or David.Mayer@wildlife.ca.gov.

Sincerely,



Gail Sevens
Environmental Program Manager
California Department of Fish and Game

ec: Karen Goebel, U.S. Fish and Wildlife Service, Carlsbad
Scott Morgan (State Clearinghouse)
HomeFed Fanita Rancho, LLC, Jeff O'Connor

From: Haley S <frascashumaker@gmail.com>
Sent: Wednesday, November 28, 2018 5:56 AM
To: John O'Donnell
Subject: Fanita Ranch Request for Notification of Impacts

Dear Mr. O'Donnell,
Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you,
Haley Shumaker

From: Gary Siebenlist <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report.

My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

Although it is understood some trails will be wider when adjacent to roads or within developed portions of the project the great majority of trails within fuel modifications zones and preserved areas should be narrow and nature based. Trails should be designed to be maintained to no wider than 3 feet within these above-mentioned areas and should take into account current best practices for trail construction. This includes grade reversals, out-sloping of trails, limiting grades, utilizing natural terrain/features to improve sustainability and user-conflict while avoiding erosion. Trail planning that includes extreme grades, in-sloping trails/roads, wide trails, decomposed granite, water bars are unsustainable and will lead to erosion, soil dispersion, off trail activities and other negative effects on preserved lands.

The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and mountain bikes in mind. Bike Parks and mountain bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

Avid mountain biker and trail user,

From:
Gary Siebenlist

715 J Ave, 307
San Diego, CA 92101
858-245-3177

From: Marni Borg <mborg@CityofSanteeCa.gov>
Sent: Thursday, November 15, 2018 12:37 PM
To: Diane Sandman
Subject: FW: Notice of Preparation for Fanita Ranch project

-----Original Message-----

From: John O'Donnell
Sent: Tuesday, November 13, 2018 5:12 PM
To: Marni Borg
Cc: Melanie Kush
Subject: FW: Notice of Preparation for Fanita Ranch project

-----Original Message-----

From: Dan Silver [<mailto:dsilverla@me.com>]
Sent: Tuesday, November 13, 2018 1:59 PM
To: John O'Donnell
Subject: Notice of Preparation for Fanita Ranch project

Nov. 13, 1018

John O'Donnell
Development Services
City of Santee

RE: Notice of Preparation for Fanita Ranch project

Endangered Habitats League requests to be placed on all mailing and distribution lists for this project, including CEQA documents and public hearings. Electronic format is preferred.

Thank you and please confirm your receipt.

Regards,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org

From: Dan Silver <dsilverla@me.com>
Sent: Saturday, December 8, 2018 11:35 AM
To: John O'Donnell
Subject: Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project

December 8, 2018

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071
jodonnell@cityofsanteeca.gov

RE: Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project (SCH #2005061118)

Dear Mr O'Donnell:

Please place Endangered Habitats League on all mailing and distribution lists for this project, including CEQA documents and public hearings. Electronic transmittal is preferred.

Thank you, and your confirmation is requested and appreciated.

Regards

Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750

dsilverla@me.com

www.ehleague.org

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

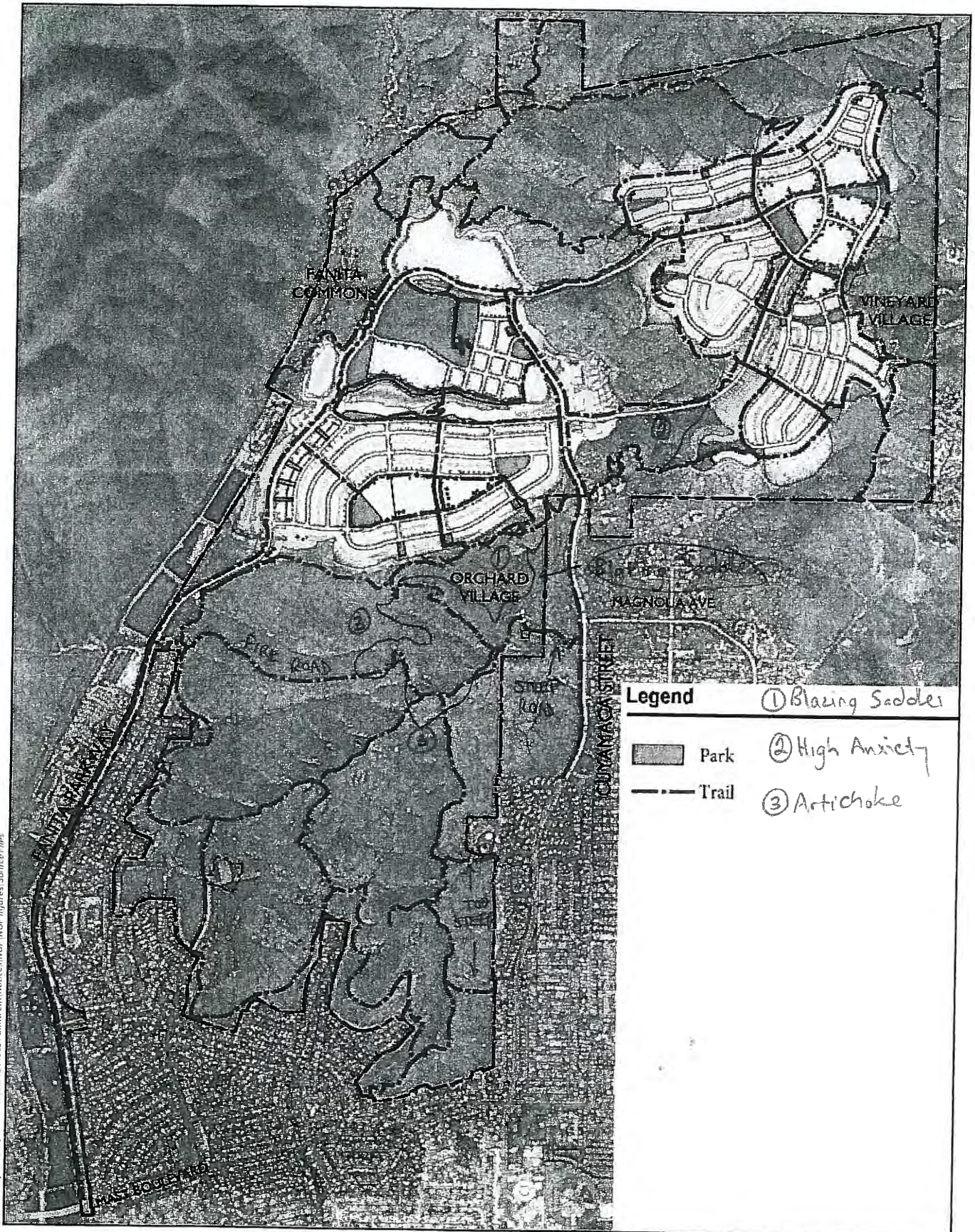
Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsanteeca.gov.

Name: Evan Sollberger

Date: 11/29/18

The trail plan has some nice features however it fails to include some high quality trails that exist on the ground. In one case, at #1 drawn on the map, a brand new trail is drawn in above the words "Orchard Village" when there is a great trail called Blazing Saddles which exists on the south side of that valley. I've drawn that in on the map.

Similarly, two great trails are missing from the plan and should be included. High Anxiety is a nice trail which will be partly destroyed by the upper pad. The lower trail should continue to exist as a narrow trail over to Street "W". The trail Artichoke is another excellent trail that should be kept. It traverses a high ridge to bypass a steep fire road. Fire roads do not provide a nature experience and should not be counted as trails in the plan.



Public: P:\projects\City of San Jose - 1501144402 - Landa, Erik\Projects\NOP\NOP Figures\San Jose Files

Source: KTG Planning + Architecture

 **Harris & Associates** NOT TO SCALE



Figure 5
Parks and Trails Plan

~~EDITOR'S~~ COMPILER'S NOTE - THIS WAS ATTACHED TO MR. SOLBERGER'S COMMENT SHEET.
JRM

From: Jo Ann Sosh <joannsosh@hotmail.com>
Sent: Wednesday, November 21, 2018 11:44 PM
To: John O'Donnell
Subject: Revised Environmental impact Report for Fanita Ranch

Dear Mr O'Donnell,

Please place my husband and myself on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Thank you,

Mr. and Mrs. Rick Sosh

Sent from my Verizon 4G LTE smartphone

From: Aaron Starns <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project.

Aaron

From:
Aaron Starns

8641 Willow Terrace
Santee, CA 92071
6196471669

From: Alex Stillman <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

please take time to consider my feedback regarding this legislature. The trail system which is under review today by this change is well established and frequently used in a responsible way by nature lovers, mountain bikers, hikers, and folks who appreciate and watch over the area, myself included. Disrupting the trail network would have negative impacts, specifically, erosion of the area by forcing some users off trails. Folks from Santee, Lakeside, and Poway regularly enjoy this scenic part of the county, not to mention this proposal may impact SDMBA's sponsored revenue generating events that occur in Goodan Ranch. These events fund trail maintenance and governance.

The connections to other parks and trails are of vital importance to the community of Santee at large. Trails should be planned for connections to the new community, parks, existing community of Santee, Mission Trails Regional Park, Stowe Trail and Sycamore Goodan Ranch. Active parks within Fanita Ranch should be designed with mobility and bikes in mind. Bike Parks and Bike features within these parks would be compatible with the overall design of the trail system and the focus of creating an active community.

Thank you for taking my feedback into account on this project,

From:
Alex Stillman
525 Heather Ridge Rd
San marcos, CA 92078
8588642380

From: Jenece Tagg <jenecet@yahoo.com>
Sent: Monday, December 10, 2018 4:20 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr. O'Donnell -

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

In addition to the usual concerns regarding the development of Fanita Ranch (lack of adequate infrastructure, too much traffic, fire danger, water supply, etc. etc.), we are very concerned about the impact such a project would have on Cuyamaca Street.

With the expansion of Cuyamaca being largely the only way in and out of the community, this looks very worry some.

What if something happens at the intersection of Cuyamaca and Magnolia (or any of the other streets currently residential, which will most likely have a traffic signal installed (i.e. El Nopal and Woodglen Vista) and traffic can not get through? If there was a fire or evacuation, how is everyone to get out of FR? Or what if there was an accident at the intersection blocking all traffic, or traffic signals were out, a power failure, etc.?

Can Cuyamaca take the stress of all this additional traffic/usage? The intersection of Mast and Cuyamaca is currently overworked as it is. There is the school there. Can the crossing guard handle all that additional FR traffic when helping kids cross the street? This is very dangerous when school is in session. Currently, it can take 3 light cycles to get through that intersection to head north up current Cuyamaca. How will all the additional cars heading up to FR to live/work/etc. impact this area?

Cuyamaca will turn into a mini freeway, much as Mast is now. It's expansion area is all residential. Cars will be flying up and down, again as the main road in and out. Residential streets in District 1 will be severely impacted by this additional traffic. In addition to traffic signals, side streets will be inundated by cars from outside the neighborhood cutting through trying to avoid traffic, take short cuts, etc. There will

no doubt be speeding through the neighborhoods, again a very dangerous situation caused by bottlenecks in such a large area.

Thank you,

Jenece Tagg

Keith Polan

FEEDBACK FORM

Public Scoping for the Fanita Ranch Draft Revised Environmental Impact Report (EIR)

Please provide input on the scope and content of the environmental analysis prepared for the Fanita Ranch Revised EIR. You may return this form tonight to a City staff member or email, mail, or return in person to John O'Donnell, Principal Planner, Development Services Department, City Hall, Building 4, 10601 Magnolia Avenue, Santee, CA 92071 (postmarked by December 10, 2018) or jodonnell@cityofsantee.ca.gov.

Name: MARTHA TASSI

Date: 11/29/18

THANKS FOR YOUR HARD WORK ON THIS. THE PLANS ARE AMBITIOUS, PERHAPS 'TOO MUCH' COMING ON THE HEELS OF THE WESTON PROJECT. CAN IT BE SCALED BACK? PEOPLE REALIZE THAT SOMETHING WILL BE BUILT THERE, BUT A SMALLER PROJECT WOULD BE MORE PALATABLE.
THANKS!

VIEJAS

TRIBAL GOVERNMENT

P.O. Box 908
Alpine, CA 91903
#1 Viejas Grade Road
Alpine, CA 91901

Phone: 6194453810
Fax: 6194455337
viejas.com

December 6, 2018

John O'Donnell
Principal Planner
Development Services Department City Hall, Building 4
10601 Magnolia Avenue
Santee, CA 92071

RE: Fanita Ranch Project

Dear Mr. O'Donnell,

In reviewing the above referenced project the Viejas Band of Kumeyaay Indians ("Viejas") would like to comment at this time.

The project area may contain many sacred sites to the Kumeyaay people. We request that these sacred sites be avoided with adequate buffer zones.

Additionally, Viejas is requesting, as appropriate, the following:

- All NEPA/CEQA/NAGPRA laws be followed
- Immediately contact Viejas on any changes or inadvertent discoveries.

Thank you for your collaboration and support in preserving our Tribal cultural resources. I look forward to hearing from you. Please call me at 619-659-2312 or Ernest Pingleton at 619-659-2314, or email, rteran@viejas-nsn.gov or epingleton@viejas-nsn.gov, for scheduling. Thank you.

Sincerely,



Ray Teran, Resource Management
VIEJAS BAND OF KUMEYAAY INDIANS

RECEIVED

DEC 20 2018

Dept. of Development Services
City of Santee



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer To:
FWS-16B0244-19CPA0056

December 21, 2018
Sent by Email

Mr. John O'Donnell
Senior Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071

Subject: Comments on the Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California

Dear Mr. O'Donnell:

The U.S. Fish and Wildlife Service (Service) has reviewed the above referenced Notice of Preparation (NOP) dated November 9, 2018, for the Fanita Ranch Project (Project). The Project details provided herein are based on the information provided in the NOP, our knowledge of sensitive and declining vegetation communities in the region, multiple meetings with the City of Santee (City) and the Project applicant regarding Preserve design, and our participation in the Multiple Species Conservation Program (MSCP).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. As such, the Service is responsible for administering the Migratory Bird Treaty Act of 1918 (16 U.S.C. 703-712), Bald and Golden Eagle Protection Act (Eagle Act; 16 U.S.C. 668-668c), and Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act.

The City and Project fall within a Subarea planning unit within the larger San Diego MSCP, sometimes referred to as the "umbrella plan." The MSCP is a regional, landscape-level plan to preserve San Diego's unique, native habitats and wildlife for future generations. The plan was completed in 1998 and crosses political boundaries in a unique regional conservation effort that streamlines the permitting process for development projects by ensuring compliance with the Act, the California Endangered Species Act (CESA; Fish and Game Code § 2050 *et seq.*), and the Natural Communities Conservation Planning (NCCP) Act. Projects and subarea plans within the MSCP should support the goals and objectives of the 1998 umbrella plan and should also address the conservation needs of any sensitive species federally or State listed or proposed since the MSCP was completed.

The 2,635-acre Project site is located north of State Route 52 and west of State Route 67 in eastern San Diego County. It is bordered to the west by open space lands owned by the Marine Corps Air Station Miramar and Padre Dam Municipal Water District, to the north and west by open space lands owned by the County of San Diego Parks and Recreation Department, and to the south and east by a mix of residential development and undeveloped lands. The proposed Project consists of 2,949 housing units with a school or 3,008 housing units without a school, up to 80,000 square feet of commercial uses, parks, open space, trails, and agricultural uses. A General Plan Amendment would be required as the City's current General Plan guidelines only allow the development of approximately 1,300 residential units on the Project site.

Consistent with NCCP/HCP guidance, the Service has been working with the City and the California Department of Fish and Wildlife to develop a draft Subarea Plan, and as part of this process, we have reviewed and provided the Project applicant with comments on the proposed Project. The Habitat Preserve associated with the Project is a key component of the City's proposed Subarea Plan Preserve. Although the NOP states that the Habitat Preserve would be dedicated to the City's Subarea Plan Preserve, a final Subarea Plan is not yet completed or permitted, and the NOP does not indicate that the Project applicant intends to seek incidental take coverage for listed/sensitive species through the City's Subarea Plan. We recommend the Draft Revised Environmental Impact Report (draft EIR) identify whether the proposed Project will be included as a "Covered Project" in the City's draft Subarea Plan with incidental take coverage proposed under the plan.

We request that the draft EIR address the following: 1) how the proposed configuration and perpetual management/monitoring of the Habitat Preserve would benefit the "Covered Species" proposed in the City's draft Subarea Plan; 2) how the Habitat Preserve, with 35 acres of proposed regional trails, would adequately minimize and mitigate impacts to listed and sensitive species; 3) how the Habitat Preserve would be managed, including identification of management funding, the proposed land manager, and the proposed land protection instrument that will provide in-perpetuity protection of the sensitive resources; 4) whether the proposed Open Space areas, which consist of brush management areas, detention basins, trails heads, and riparian areas managed by the Homeowners Association, are proposed as mitigation for Project impacts to listed and sensitive species, and if so, what will be the benefit of such management and how will it be accomplished; 5) detailed information on the proposed wildlife crossings that indicates how functionality would be achieved; 6) detailed information regarding the proposed "off-site" improvements; 7) definitions of the terms primitive and native trail system, including width/length of the proposed trails, and types of proposed recreational opportunities (types of uses) within the proposed Habitat Preserve; and 8) identification of areas proposed to be restored with native vegetation communities/habitats and methods to be used in pursuit of that goal.

The Service provided written comments to the City on December 20, 2016, to address regional and area-wide protection and management of natural wildlife diversity, proposed Covered Species under the draft Subarea Plan, and overall reserve design for the proposed Project. Based on a comparison of the maps provided in 2016 with those included in the current Project NOP, the Project footprint and configuration of general open space areas, aside from the potential addition of new trails, is similar to what was proposed in 2016. We request that the City consider our previous comments and recommendations when preparing the draft EIR for the Project. Our comments and recommendations were based on the conservation challenges facing the MSCP Subregion, including the accelerated

loss of sensitive habitats, effects of wildfire and climate change, and new scientific knowledge regarding sensitive species occupying the Project site, and these issues are still relevant today.

Finally, as provided in the Service's letter dated May 14, 2018, we reiterate that the Project, if proposed as a Covered Project under the City's Subarea Plan, should support the intent of the plan to meet the issuance criteria for a section 10(a)(1)(B) permit under the Act.

Thank you for the opportunity to comment on the Project NOP. If you have any questions or comments regarding this letter, please contact Mary Beth Woulfe at MaryBeth_Woulfe@fws.gov or 760-431-9440, extension 294.

Sincerely,

Karen A. Goebel
Assistant Field Supervisor

cc:

State Clearinghouse, Scott Morgan
HomeFed Fanita Rancho, LLC, Jeff O'Connor



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008



In Reply Refer To:
FWS-16B0244-19CPA0056

December 21, 2018
Sent by Email

Mr. John O'Donnell
Senior Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Avenue
Santee, California 92071

Subject: Comments on the Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California

Dear Mr. O'Donnell:

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Thank you for the opportunity to comment on the Project NOP. If you have any questions or comments regarding this letter, please contact Mary Beth Woulfe at MaryBeth_Woulfe@fws.gov or 760-431-9440, extension 294.

Sincerely,

Karen A. Goebel
Assistant Field Supervisor

cc:
State Clearinghouse, Scott Morgan
HomeFed Fanita Rancho, LLC, Jeff O'Connor



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008
760-431-9440
FAX 760-431-9624



California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego, California 92123
858-467-4201
FAX 858-467-4299

In Reply Refer To:
FWS/CDFW-16B0244-17CPA0016

December 20, 2016
Sent by Email

Mr. Jeff O'Connor
HomeFed Corporation
1903 Wright Place, Suite 220
Carlsbad, California 92008

Ms. Melanie Kush
Director of Developmental Services
City of Santee
10601 Magnolia Avenue
Santee, California 92071

Subject: Proposed Fanita Ranch Project within the City of Santee Draft MSCP Subarea Plan,
City of Santee, San Diego County, California

Dear Mr. O'Connor and Ms. Kush:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department) have been working with the City of Santee (City) on development of the City's Multiple Species Conservation Program (MSCP) draft Subarea Plan, including review of HomeFed Corporation's (HomeFed) proposed Fanita Ranch project. Per a request from the City and HomeFed, we have reviewed the maps of the most recent proposed footprint for the project, which were provided by HomeFed in July 2016 (hard copy) and September 2016 (digital), along with relevant biological information previously provided or in our records. The maps included basic development features of the proposed Fanita Ranch project. In the interest of providing a timely response to HomeFed and the City, we reviewed only the limited suite of fundamental components of the proposed Fanita Ranch project that were available at this early stage of project and MSCP draft Subarea Plan development and design.

We analyzed the proposed development polygons for the Fanita Ranch project in view of regional and area-wide protection and management of natural wildlife diversity, proposed covered species, and overall reserve design to provide a preliminary assessment of whether the project would meet permit issuance criteria pursuant to section 10(a)(1)(B) of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*), and findings pursuant to the Natural Community Conservation Planning Act (NCCP Act) of 1991, as amended. We did not compare the current proposal with various former footprints proposed by previous owners of the property over the past 18 years.

Consistent with the issues we have raised at our meetings with the City and HomeFed over the past several months and in our letter of September 16, 2016, we continue to be concerned about the proposed Fanita Ranch project's development footprint and reserve design. These concerns are based on current ecological information and baseline resource conditions, including development within and adjacent to the City of Santee, the effects of past wildfires and future threats including edge effects and from proposed development and the potential effects associated with climate change, the status of proposed covered species and associated habitats, and the overall status of reserve assembly under the MSCP in southwestern San Diego County. As more specifically explained by the analyses provided in the Enclosure, our preliminary conclusion is that the proposed Fanita Ranch project will not meet the issuance criteria for a section 10(a)(1)(B) permit or support corresponding positive findings under the NCCP Act.

The proposed Fanita Ranch project would develop nearly 40 percent of the project site, and the proposed footprint would spread development across the project site landscape within multiple polygons. The project proposal would also have long connecting roads that would pass through and encircle intervening undeveloped reserve areas and require considerable extension of public facilities and services. The proposed road and development polygons would combine to fragment a large undeveloped and mostly intact open space area of high ecological integrity into a series of natural areas with new, high-level edge effects. Despite their absolute size, the resultant reserve areas would reduce the likelihood of maintaining sensitive species' numbers and viabilities, including the Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), western spadefoot toad (*Spea hammondi*), coastal cactus wren (*Campylorhynchus brunneicapillus*), and the San Diego golden star (*Bloomeria clevelandii*).

We suggest the proposed project footprint be reconsidered and modified with an improved reserve design. To that end, we have the following recommendations at this time for redesign of the proposed Fanita Ranch project:

1. The project should be redesigned to consolidate proposed development into a single polygon located largely in the southern portion of the site. This would reduce the amount of new development edge adjacent to remaining natural areas by eliminating "island" or "peninsula" types of development zones and fragmentation associated with infrastructure within surrounding natural areas.
2. The proposed reserve areas on site should be designed to be more contiguous across the property and with functional linkages to surrounding areas. Reserve areas should not be fragmented by roads or structure development.
3. A new modified reserve design should include a main reserve area with minimal new or existing edge effects.
4. Proposed project development should be sited closer to existing development in Santee in the southern portion of the site. This configuration would effectively provide for more inherent protection of new development from wildland fire (reducing concerns and conflicts

regarding natural fire in reserve areas) and much more effectively ensure/accommodate natural fire frequencies within remaining reserve areas.

5. The proposed project should provide improved conservation of habitats used by coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot toad, through increasing the acreages of respective habitats conserved that would not be subject to proposed construction or ongoing operational disturbance, modified natural fire cycles, edge effects, and/or fragmentation.
6. Proposed development and reserve areas should be fully buffered from each other using: fuel modification and stormwater detention zones with native landscaping, passive use areas such as strip parks with minimal irrigation, single-loaded roads, and peripheral trails. All buffer areas should be unlit; adjacent development/road areas should have minimized lighting that is directed and shielded away from buffer zones and natural areas.
7. Any roadways that would otherwise cross natural/reserve areas should be avoided or minimized to the maximum extent practicable. Such roads that cannot be avoided should be: a) as short and as narrow as possible (including any sidewalks) and without medians or curbs/gutters; b) consolidated with existing development by aligning them adjacent to developed areas where practicable (except as needed to avoid concentrations of sensitive species); c) designed for and requiring low maximum speed limits; d) unlit; e) landscaped only with native plants; f) designed to reduce wildlife roadkill, including appropriate fencing and native landscaping to direct wildlife movement to safe and functional ground corridors (as determined by the specific target/covered species) or to adequate heights above the roadway to avoid vehicle strikes (for birds and bats using tall native vegetation); and g) signed to raise awareness of wildlife corridors/crossings. Any recreational trails in the area should use some of these same wildlife corridor road crossings, such as bridges and large soft-bottomed culverts, to reduce the total extent of development infrastructure and increase corridor crossing function and size for wildlife.
8. The main east-west running riparian drainage through the project site should be fully conserved for ecosystem functions, including it as (at least) a wide, high-function east-west linkage for both covered species and typical target wildlife corridor species.
9. The project should be revised to minimize and mitigate impacts to listed species to the maximum extent practicable with a goal of no net loss of sensitive biological resources and their values, services, and functions resulting from proposed activities.
10. Vernal pools and their watersheds should be avoided to the maximum extent practicable. High-function vernal pools and their watershed should be avoided and conserved. Moderate function vernal pools on site should be restored or enhanced, as practicable.

We maintain that our previously suggested reserve/footprint designs for the Fanita Ranch project are consistent with the MSCP Subregional Planning goals and address the reserve design and species and habitat conservation needs identified above.

Our comments herein are directed by changes in conservation challenges and practices over the last decade, including accelerated loss of many habitats, effects of wildfire and climate change, and advances in conservation science. We continue to be available to work with representatives from HomeFed and the City on a revised project footprint for the Fanita Ranch project that would fully minimize and mitigate the loss of proposed covered species and habitats.

The literature cited in the Enclosure in support of our conclusions is available upon request. If you have any questions regarding this letter, please contact Carol Roberts of the Service at (760) 431-9440 or David Mayer of the Department at (858) 467-4234.

Sincerely,

Karen A. Goebel
Assistant Field Supervisor
U.S. Fish and Wildlife Service



Gail Sevens
Environmental Program Manager
California Department of Fish and Wildlife

Enclosure

cc:
James Whalen, J. Whalen Associates, Inc.

From: May Ann Valledor <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
May Ann Valledor
1810 Broadway St, 19

Oceanside, CA 92054
+17606722896

From: Vonblum, Heidi <VonblumH@sandiego.gov>
Sent: Monday, December 10, 2018 12:35 PM
To: John O'Donnell
Subject: Fanita Project NOP Extension Request

Importance: High

Mr. O'Donnell:

Thank you for the opportunity to review the Notice of Preparation for the Fanita Ranch Project. I am writing to request a four-day extension for the City of San Diego to submit a comment letter by no later than Friday, December 14, 2018. I appreciate your consideration. Please let me know whether the City of Santee can grant this request at your earliest convenience.

Heidi Vonblum
Program Manager | Environment & Mobility Division
Planning Department | City of San Diego
9485 Aero Drive | San Diego CA 92123
619.446.5363 | VonblumH@sandiego.gov

From: Elizabeth Walk <liz.walk@cox.net>
Sent: Tuesday, November 27, 2018 8:25 PM
To: John O'Donnell
Subject: DREIR for Fanita Ranch Project (SCH# 2005061118)

Dear Mr. O'Donnell,

Please add me to the notification list for the release of the Draft Revised Environmental Impact Report on the proposed Fanita Ranch project. I'm a 15-year resident of Santee concerned about the ramifications of such a large project in regards to the character of our city and our rural surroundings. In a time of increasing drought and wildfires, the siting and the scope of the project seem concerning. I appreciate your attention in adding me to this list.

Sincerely,
Elizabeth Walk
Fortuna Vista Ct

From: David Walsh <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
David Walsh
4782 Academy Pl Apt A

San Diego, CA 92109
858-768-1920

From: Larry Waterman <larry.lwmail@gmail.com>
Sent: Wednesday, November 21, 2018 8:16 PM
To: John O'Donnell
Subject: Fanita Ranch

Dear Mr O'Donnell,

Please place me on the notification list for Release of the Revised Environmental Impact Report for Fanita Ranch.

Larry Waterman

larry.lwmail@gmail.com

From: Kevin Westfall <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

Kevin Westfall

From:
Kevin Westfall

9903 Paseo Montril
San Diego, CA 92129
8582433390

From: Tanner Wheatley <no-reply@memberleap.com>
Sent: Tuesday, December 4, 2018 10:03 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. My comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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Thank you for taking my feedback into account on this project,

From:
Tanner Wheatley

San Diego, CA 92107

From: Nicholas Whipps <nwhipps@wittwerparkin.com>
Sent: Monday, December 10, 2018 4:33 PM
To: John O'Donnell
Subject: Fanita Ranch Project Notice of Preparation
Attachments: 2018 12 10 Fanita Ranch NOP.pdf

Dear Mr. O'Donnell:

Attached, please find comments regarding the Fanita Ranch Project Notice of Preparation, submitted on behalf of the Southwest Regional Council of Carpenters.

Very truly yours,

NICHOLAS WHIPPS

wittwer / parkin

WITTWER PARKIN LLP
147 S. RIVER ST., STE. 221
SANTA CRUZ, CA 95060
831.429.4055
WWW.WITTWERPARKIN.COM

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December 10, 2018

Sent via Email

John O'Donnell, Principal Planner
Development Services Department
City Hall, Building 4
10601 Magnolia Ave.
Santee, CA 92071
jodonnell@cityofsanteeca.gov

Re: Fanita Ranch Project – Draft Revised Environmental Impact Report

Dear Mr. John O'Donnell:

This law firm represents the Southwest Regional Council of Carpenters (Southwest Carpenters) and submits this letter on the above-referenced project on its behalf.

Southwest Carpenters represents 50,000 union carpenters in six states, including in Southern California, and has a strong interest in ensuring well-ordered land-use planning and reducing the environmental impacts of development projects, such as the Fanita Ranch Project (Project). In its Notice of Preparation, the City of Santee (City) determined the Project would have a significant effect on almost all aspects of the environment.

While details regarding the Project and the City's evaluation of environmental impacts are sparse, the City describes the Project as permitting 80,000 square feet of commercial uses, approximately 3,000 dwelling units, parks, open space, agriculture, and streets and other related infrastructure and offsite development. Development would occur within three "villages," which would all be constructed in the northern portion of the Project site, while the open space would primarily be wedged between Project housing and urban development to the south. The City describes necessary City approvals as including:

- Fanita Ranch Specific Plan Area
- Zone Change
- General Plan Amendment
- Tentative Subdivision Map(s)
- Grading Permit
- Development Review Permit(s)
- Conditional Use Permit
- Encroachment Permit(s), and

- Vacations

In addition, the City references several state and federal approvals, including Section 401, Section 404 and NPDES permits, Endangered Species Act consultation or an Incidental Take Permit, and a Streambed Alteration Agreement.

Southwest Carpenters agrees the Project has the potential to cause significant impacts in almost every regard, which the City must mitigate to the maximum extent possible.

Reliance on Outdated, Rescinded Environmental Review

As the City recognizes, the 2007 EIR for a different project proposed to be located at the Project site was invalidated due to several deficiencies, including its failure to adequately evaluate impacts to water supply and biological resources. The City does not claim this 2007 EIR was ever found valid by a court in return-to-writ proceedings. Nonetheless, the City refers to the EIR it plans to prepare for the Project as a "Recirculated Draft Environmental Impact Report," implying it plans to reuse portions of the invalidated 2007 EIR in its analysis.

The City should not do this for multiple reasons. First, as mentioned, above, the City does not claim the invalidated 2007 EIR was ever validated pursuant to return-to-writ proceedings. It would be improper for the City to rely on the information and analysis contained in an invalidated EIR, absent conducting a return to writ. As the Project is completely different from the one proposed in 2007, it is unlikely this would even be possible.

Second, the information contained in the 2007 EIR is at least a decade old and cannot be considered modernly relevant. For instance, information regarding impacts related to climate change, air quality, water supply, and biological resources would have significantly changed between now and 2007. The 2007 EIR could not have contained a greenhouse gas impact analysis that would be considered adequate by today's standards, if, indeed, it contained one at all.

Finally, and most importantly, the City cannot rely on the 2007 EIR because this EIR was prepared for, and analyzed, a completely different and much smaller project. The City cannot rely on the impacts analysis evaluating a much smaller project. Whereas the 2007 project proposed approximately 1,400 dwelling units, the Project proposes approximately 3,000—over double the density of the 2007 Project. The Project will cause much greater impacts that were not considered in the 2007 EIR. Therefore, the City should prepare a new and updated EIR, that is entirely independent from the invalidated EIR.

Air Quality and Greenhouse Gas

While the Project will likely be found to have significant and unavoidable air quality and greenhouse gas impacts, the City must still mitigate Project impacts to the maximum extent feasible.

The City should disclose baseline air quality conditions of the Project area. Furthermore, the City must describe the impact the Project would have in comparison to this baseline, particularly as the Project would require the hauling of 27 million cubic yards of cut and fill and would substantially increase the housing density within the Project area, including any conflict with any air quality management plan in effect within the air basin. Importantly, the City must accurately describe cumulative air quality impacts in relation to the Project.

Regarding greenhouse gases, the City should quantify baseline greenhouse gas emissions, as well as any new emissions that will be caused by the Project and compare those emissions to a quantitative significance threshold to determine the significance of these impacts. Furthermore, the City should address whether it has promulgated a Climate Action Plan and, if so, whether the City is currently on track to meet the reductions goals of its Climate Action Plan, and whether this plan has been updated to reflect the greenhouse reductions required by all applicable laws and policies.

Biological Resources

The proposed design of the Project is concerning. While the City claims the Project would leave a large portion of the Project site undeveloped, the City does so in a way that would envelop this open space in between urbanized development in a manner that would significantly decrease the value of this habitat to wildlife. The City should consider a Project alternative that would reduce edge effects and increase the amount of continual habitat, such as by reducing the number of housing units and by placing all lands to be perpetually designated as native habitat to the far north and west of the Project site, as opposed to being enveloped by development in the south.

Hazards and Hazardous Materials

The Project borders wildlands that are known for being a high fire hazard. Furthermore, the City must evaluate the potential of the Project to construct development in areas prone to landslide, earthquake, and flooding. The City should also evaluate the hazards of placing high-density residential development near an airport and would ideally avoid any placement of housing near the airport altogether. Finally, in the DEIR, please disclose all areas that are known

John O'Donnell, Principal Planner
Re: Fanita Ranch RDEIR
December 10, 2018
Page 4

to the City to contain hazardous materials, such as properties listed in state or federal databases as hazardous waste or remediation sites.

Public Services and Utilities

As the Project will greatly increase residential development, it likely the City will determine there will be significant impacts to public services, recreational resources, and public utilities. The City must account for and mitigate impacts to all of these services and utilities.

Water Supply

The 2008 lawsuit was commenced, in part, due to concerns over the City's limited water supplies. Despite this, the City now proposes a Project over twice as large as the project that was invalidated, notwithstanding intervening drought and worsening water supply concerns. The Project will place a severe strain on the City's water resources. Please evaluate whether the City will have sufficient water to supply the Project, in addition to any potential impacts the Project will cause to water quality.

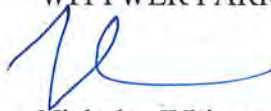
Conclusion

Southwest Carpenters thanks the City for providing an opportunity to comment on the Notice of Preparation. Pursuant to Section 21092.2 of the Public Resources Code and Section 65092 of the Government Code, Southwest Carpenters request notification of all CEQA actions and notices of any public hearings concerning this Project, including any action taken pursuant to California Planning and Zoning Laws. In addition, pursuant to Public Resources Code section 21167(f), please provide a copy of each Notice of Determination issued by the City in connection with this Project and please add Southwest Carpenters to the list of interested parties in connection with this Project and direct all notices to my attention. Please send all notices by email, or if email is unavailable, by U.S. Mail to:

Nicholas Whipps
Ashley McCarroll
Wittwer Parkin LLP
147 S. River St., Ste. 221
Santa Cruz, CA 95060
nwhipps@wittwerparkin.com
amccarroll@wittwerparkin.com

John O'Donnell, Principal Planner
Re: Fanita Ranch RDEIR
December 10, 2018
Page 5

Very truly yours,
WITTWER PARKIN LLP



Nicholas Whipps

From: Brandy Wirtz <no-reply@memberleap.com>
Sent: Saturday, December 8, 2018 8:17 PM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

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Thank you for taking my feedback into account on this project,

From:
Brandy Wirtz
1717 north elm street

Escondido, CA 92026
7606707607

From: Cynthia Wootton <wootton-clark@outlook.com>
Sent: Monday, December 3, 2018 7:52 PM
To: John O'Donnell
Subject: Opposition to Fanita Ranch development

Dear Mr. O'Donnell:

What San Diego needs is affordable housing in concentrated areas near a variety of transportation routes, businesses, schools, community services.

What we don't need is building communities in fire prone areas, near the little open space we have left in our county.

When fires rage people need to have evacuation routes and shelters nearby.

Many fires are caused by poor power company infrastructure and many others are caused by human carelessness in fire prone areas. When open space is nearby, people and power infrastructure will cause fires. Who pays when people are rendered homeless, injured, dead by fires started by people or power companies? The victims and taxpayers pay the greatest burden. Usually, the power companies don't pay their share.

Furthermore, the more remote the area to be developed, the fewer evacuation routes options there are when tragedy hits. Although developers have fire retardant plans, generally, they leave the real burden of infrastructure & fire risk mitigation on taxpayers. If additional evacuation routes are built, the taxpayers build and maintain them.

Many development projects are owned by land speculators, many of whom are out-of-town and don't close pay attention infrastructure or evacuation congestion in emergency situations.

It is we, who live in or near Santee that will have the effects of toxic smoke inhalation during wildfires or simply the poor air quality resulting from traffic congestion.

Developers, city planning groups must work closely with the organizations who are looking ahead to mitigate the fire fury that is flaring up increasingly in California's past and future.

I live in San Carlos, near Mission Trails Park and over the gorge from Santee. Fires that start in my area or in Santee or the proposed Fanita Ranch will affect both Santee and my area. Santee is dear to me because of the many cherished friends and Neighbors I have there as well as the great shopping opportunities that take me there on a daily basis.

Thanks!

Respectfully,
Cynthia Wootton
619-461-0320
7256 Jackson Drive
San Diego CA 92119

Sent from my iPad

From: Nicholas Zahner <no-reply@memberleap.com>
Sent: Thursday, December 6, 2018 11:29 AM
To: John O'Donnell
Subject: Comment on EIR for Fanita Ranch

To: City of Santee

Please take my comments into consideration in relation to the Notice of the Draft Revised Environmental Impact Report. I am a proud Santee resident and my comments specifically relate to trail and trail standards. Trails are a vital part of our community and our preserved lands in San Diego County. They offer not only an opportunity for recreation, education, but an opportunity to create stewardship for these vital preserved lands. Without significant trail access throughout this development the community of Santee will continue to have limited trail opportunities and this will result in non-planned trails appearing within preserved areas in the future.

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My 11 year old son who loves to ride and I appreciate your consideration.

From:
Nicholas Zahner
10670 Cobble Ct.
Santee , CA 92071