

### **4.3 Side-by-Side Responses to Comments**

This section includes the comment letters received during the public review period (May 29, 2020, to July 13, 2020) for the Draft Revised EIR and the City of Santee's responses to these comments.

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## Comment Letter F1: U.S. Fish and Wildlife Service, July 13, 2020



**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



July 13, 2020  
 Sent Electronically

In Reply Refer to:  
 FWS-16B0244-20CPA0166

Mr. Chris Jacobs  
 Development Services Department  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071

Subject: Comments on the Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California

Dear Mr. Jacobs:

F1-1

The U.S. Fish and Wildlife Service (Service) has reviewed the above referenced Draft Revised Environmental Impact Report (Draft EIR) posted May 29, 2020, for the proposed Fanita Ranch Project (Project). Our comments are based on information provided in the Draft EIR, our knowledge of sensitive and declining natural communities in the region, multiple meetings with the City of Santee (City) and the Project applicant regarding preserve design, and our participation in the San Diego Multiple Species Conservation Program (MSCP). The Service has legal responsibility for threatened and endangered animals and plants occurring in the United States through the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans developed under section 10(a)(1)(B) of the Act such as the MSCP.

F1-2

The Service has been working with the City on their draft Subarea Plan (SAP), which falls within the MSCP. We have provided the City and the Project applicant with extensive comments on the proposed Project, including a reconfiguration of preserve design to address key species (in letters dated September 16, 2016; December 20, 2016; May 14, 2018; and December 21, 2018, herein incorporated by reference, and in numerous meetings beginning in 2016); yet, as presented in the Draft EIR, the proposed Project has undergone little change since 2016. We remain concerned that the draft Santee SAP currently does not address covered species adequately, most specifically the Quino checkerspot butterfly (*Euphydryas editha quino*) and Hermes copper butterfly (*Lycaena hermes*), which were not covered in the MSCP. However, alternatives provided to the proposed Project in the Draft EIR include two that would significantly address our concerns: the Modified Development Footprint Alternative (shown in Figure 6-2) and the No Vineyard Village Reduced Project Footprint Alternative (shown in Figure 6-4). Both would result in substantially reduced losses of habitats, reduce edge effects for these species in similar ways to our recommendations, and contribute significantly to conservation needed to meet issuance criteria for the Santee SAP.

F1-3

F1-4

**F1**

**F1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**F1-2:** The comment states that the U.S. Fish and Wildlife Service (USFWS) has been working with the City on the City’s Draft Santee Multiple Species Conservation Program (MSCP) Subarea Plan and through that process has provided comments on the proposed project since 2016. The comment refers to four letters for reference dated from 2016 or 2018. The comment then states that the proposed project has undergone little change since 2016. This comment provides background information and serves as an introduction to the following comments, but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

The four letters referenced in the comment have been reviewed. The referenced letters are related to the Draft Santee MSCP Subarea Plan and pre-date the release of the Notice of Preparation of the EIR; therefore, they are not specific to the contents of the EIR and do not raise an issue within the meaning of CEQA.

Regarding the proposed project's conformance with the MSCP, the EIR provides mitigation to reduce impacts to less than significant in accordance with CEQA requirements. Moreover, although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is still used as the guidance document for projects occurring within the City of Santee. In general, MSCP Subarea Plans must be prepared to the higher conservation standard of the NCCP Act, as well as the federal HCP Manual, to be permitted. The EIR is consistent with the Draft Santee MSCP Subarea Plan, which would serve as a HCP pursuant to Section 10(a)(1)(B) of FESA and as an NCCP pursuant to the California NCCP Act of 1991. If the Draft Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit, as well as the state's 2081 process. Please refer to Thematic Response – Santee MSCP Subarea Plan for further details.

Further, subsequent to the letters, additional conversations between the City, applicant, and the wildlife agencies have addressed these issues as they relate to the EIR. Please also refer to response to comment F1-4 for additional responsive information regarding the proposed project design.

USFWS’s NOP comment letter, dated December 21, 2018, requested clarification on eight points. These included 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;

**Response 1** – Refer to Thematic Response – Santee MSCP 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;

**Response 2** – 35 acres of trails has been reduced to 10.52 acres (of which, 4.52 acres are existing as shown in Table 5-1b of Appendix D, Biological Resources Technical Report). Restoration and closure of existing trails would include 34.31 acres.

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;

**Response 3** – A Preserve Management Plan (PMP) has been prepared as Appendix P to the Biological

Resources Technical Report. The PMP outlines management of Habitat Preserve. Please refer to the PMP for such information.

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;

**Response 4** – The Open Space areas apply to approximately 256 acres of open space area outside of the Habitat Preserve and would not be used for mitigation. The proposed Open Space land use designation would include brush management areas (Fuel Modification Zones [FMZ]) at the edge of development, slopes adjacent to streets and within the villages, trailheads, water quality basins, land for water tanks and pump stations that would be dedicated to and maintained by PDMWD, and two riparian areas in Fanita Commons. Section 3.3.1.8, Open Space, in Chapter 3, Project Description, states that areas designated as Open Space would be owned, maintained, and managed by the HOA and would be subject to the Fire Protection Plan (FPP) (Appendix P1).

5. Detailed information on the proposed wildlife crossings that indicates how functionality would be achieved;

**Response 5** – Wildlife crossings are analyzed in the Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, in Section 4.3, Biological Resources. A wildlife undercrossing is proposed under Cuyamaca Street. The proposed crossing would measure 6.9 meters (22.5 feet) wide by 3.7 meters (12 feet) tall by 35 meters (115 feet) long (0.7 openness ratio<sup>1</sup>), would meet the suggested 0.6 openness ratio suggested for large mammals in Southern California. The EIR concludes that “implementation of these mitigation measures [BIO-22 and BIO-23] would reduce impacts to wildlife corridors and habitat linkages to below a level of significance.”

6. Detailed information regarding the proposed “off-site” improvements;

**Response 6** – Appendix D, Biological Resources Technical Report, included analysis of 32.6 acres of off-site improvements related to Cuyamaca Street and Magnolia Avenue. These impacts have been included in the analysis in the EIR as requested.

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<sup>1</sup> The ACOE defines a culvert’s openness ratio as the culvert’s cross-sectional area divided by its length. This is calculated in meters.

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

**Response 7** – The PMP and Appendix T, Public Access Plan, of the Biological Resources Technical Report (Appendix D) provide the information regarding trail access, trail types, and uses within the Habitat Preserve.

8. Identification of areas proposed to be restored with native vegetation communities/ habitats and methods to be used in pursuit of that goal.

**Response 8** – See Appendix Q, Upland Restoration Plan, to the Biological Resources Technical Report (Appendix D), which provides a conceptual restoration plan for upland areas.

- F1-3:** The comment expresses concern that the Draft Santee MSCP Subarea Plan does not address certain proposed covered species adequately, specifically Quino checkerspot butterfly (*Euphydryas editha quino*) and Hermes copper butterfly (*Lycaena hermes*), which are not covered in the MSCP. The comment does not specifically address the analysis contained in the EIR; rather, it refers to the Draft Santee MSCP Subarea Plan preservation of these species. This comment does not



raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Nonetheless, Section 4.3.2.3, Local, outlines the regulatory requirements and permits for which the project will adhere to and process. Impacts to listed species will either be covered through the Draft Santee MSCP Subarea Plan, or if the proposed project precedes the Final Santee MSCP Subarea Plan, then take for listed species will utilize standard state and federal incidental take permit processes, as applicable. By implementing the proposed project's mitigation program summarized in Sections 4.3.5, Project Impacts and Mitigation Measures, and 4.3.6, Cumulative Impacts and Mitigation Measures, impacts to these species from the proposed project would be less than significant.

- F1-4:** The comment states that there are two EIR alternatives, the Modified Development Footprint Alternative and the No Vineyard Village Reduced Project Alternative, that would address the USFWS's concerns and substantially reduce loss of habitat and edge effects and contribute significantly to conservation needed to meet issuance criteria for the Draft Santee MSCP Subarea Plan. This comment expresses a preference for these alternatives but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Mr. Chris Jacobs (FWS-16B0244-20CPA0166)

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F1-5

Thank you for the opportunity to comment on the Project Draft EIR. By considering our comments and recommendations when preparing the Final Project EIR and revising the SAP, the City can greatly advance the habitat conservation plan permitting process. We remain committed to continue working with the City and the Project applicant to address the proposed Project under the City's SAP and ensure the resulting SAP will meet the issuance criteria for a section 10(a)(1)(B) permit under the Act. If you have any questions or comments regarding this letter, please contact [Carol Roberts](mailto:carol_a_roberts@fws.gov)<sup>1</sup> at 760-431-9440, extension 271.

Sincerely,

SUSAN WYNN

Digitally signed by SUSAN WYNN  
Date: 2020.07.13  
14:00:44 -0700

Susan E. Wynn  
Acting Assistant Field Supervisor

cc:  
State Clearinghouse, Scott Morgan  
HomeFed Fanita Rancho, J.L.C., Jeff O'Connor

Nonetheless, it is noted that Table 6-2, Summary of Impacts for Alternatives Compared to the Proposed Project, in Section 6.3, Environmentally Superior Alternative, in Chapter 6, Alternatives, summarizes all EIR alternatives compared to the proposed project. The Modified Development Footprint Alternative and the No Vineyard Village Reduced Project Alternative would have less biological impacts compared to the proposed project. However, the Modified Development Footprint Alternative would not accomplish four of the nine project objectives and may result in increased impacts in other areas, including aesthetics; air quality; geology, soils, and paleontological resources; GHG emissions; noise; population and housing; public services; recreation; transportation; utilities and service systems; and wildfire. The No Vineyard Village Reduced Project Alternative would not accomplish three of the nine project objectives described in Chapter 3 and would have greater impacts on recreation than the proposed project.

**F1-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

<sup>1</sup> carol\_a\_roberts@fws.gov

## References

USFWS (U.S. Fish and Wildlife Service) and CDFW (California Department of Fish and Wildlife). 2016. Subject: City of Santee Subarea Plan and the Multiple Species Conservation Program. Carlsbad, California: U.S. Fish and Wildlife Service. San Diego, California: California Department of Fish and Wildlife. September 16.

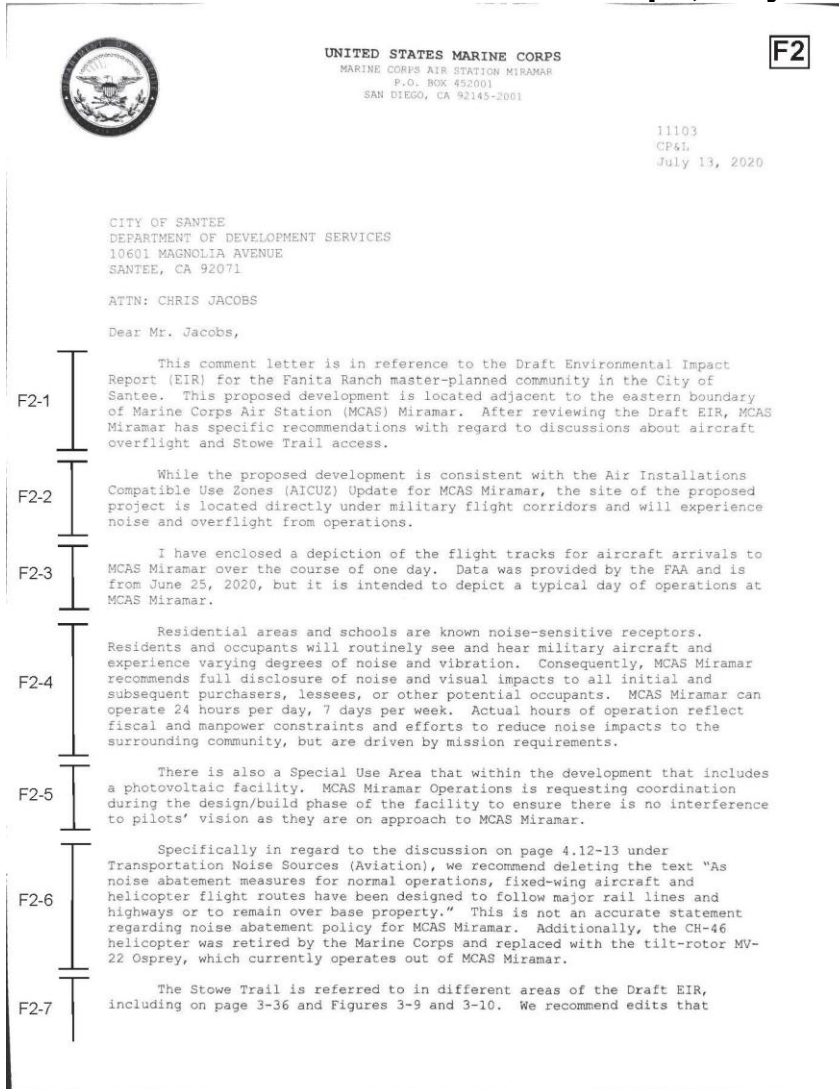
USFWS and CDFW. 2016. Subject: Proposed Fanita Ranch Project within the City of Santee Draft MSCP Subarea Plan, City of Santee, San Diego County, California. Carlsbad, California: U.S. Fish and Wildlife Service. San Diego, California: California Department of Fish and Wildlife. December 20.

USFWS. 2018. Subject: City of Santee's Draft Subarea Plan and the Fanita Ranch Project. Carlsbad, California: U.S. Fish and Wildlife Service. May 14.

USFWS. 2018. Subject: Comment on the Notice of Preparation of a Draft Revised Environmental Impact Report for the Fanita Ranch Project, City of Santee, San Diego County, California. Carlsbad, California: U.S. Fish and Wildlife Service. December 21.

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**Comment Letter F2: U.S. Marine Corps, July 13, 2020**



- F2-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- F2-2:** This comment states that the proposed project is compatible with the Marine Corps Air Station (MCAS) Miramar land use compatibility zones but will experience noise and overflight from operations. This comment is consistent with information presented in Section 4.12.5.3, Noise, Threshold 3: Aircraft Noise. No further response is required.
- F2-3:** This comment provides a depiction of typical operations at MCAS Miramar. This comment is consistent with information presented in Section 4.12.5.3, Threshold 3: Aircraft Noise. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. No further response is required.
- F2-4:** This comment states that future noise sensitive land uses on the project site, including residential areas and schools, will experience noise impacts as a result of MCAS Miramar, and recommends disclosure to future occupants. Noise exposure from MCAS Miramar is

addressed in Section 4.12.5.3, Threshold 3: Aircraft Noise. The project site would continue to be subject to audible overflights from MCAS Miramar; however, the project site is not within the air station's 60 dBA CNEL noise contour. Therefore, a significant CEQA impact would not occur, and no mitigation is required. Future real estate and tenant agreements would be subject to all applicable disclosure requirements. This issue is adequately addressed in the EIR.

- F2-5:** This comment requests coordination during the design/build phase of the Special Use area photovoltaic facility to ensure there is no interference with pilots' vision as they are on approach to MCAS Miramar. As stated in Section 4.12.5.3, Threshold 3: Aircraft Noise, the project site is currently subject to periodic overflight from MCAS Miramar. The MCAS Miramar runways are approximately 6 miles west of the project site. As stated in Section 4.1.5.4, Aesthetics, Threshold 4: Lighting and Glare, the photovoltaic solar panels in the Special Use area would be designed to absorb light, not reflect it, and would be coated with anti-reflective materials to maximize light absorption. Therefore, no potential impact is anticipated from glare from the Special Use area photovoltaic facility on pilots on approach to MCAS Miramar runways. The project applicant has agreed to confer with MCAS Miramar during the design/build phase of the solar facility.

**F2-6:** This comment requests revisions to text in Section 4.12.1.3, Existing Noise Environment, related to MCAS Miramar. The requested revisions have been incorporated as follows in Section 4.12.5.3, Threshold 3: Aircraft Noise:

MCAS Miramar is located adjacent to the west/northwestern boundary of the project site. The runways are located approximately 6 miles west of the project site. Aircraft currently flown at MCAS Miramar include F-35, F/A-18, KC-130, and C-12 aircraft, as well as ~~CH-46 tilt-rotor~~ MV-22 Osprey and CH-53 helicopters (MCAS Miramar 2018). The maximum presently authorized mission of the airfield is 112,242 annual aircraft operations. MCAS Miramar also typically hosts an annual air show that includes additional aircraft and higher than normal levels of aircraft operations during the event. ~~As noise abatement measures for normal operations, fixed-wing aircraft and helicopter flight routes have been designed to follow major rail lines and highways or to remain over base property.~~ The current Airport Land Use Compatibility Plan adopted by the County Airport Land Use Commission for MCAS Miramar indicates that the entire project site is outside the 60 dBA CNEL noise contour (SDCRAA 2011).

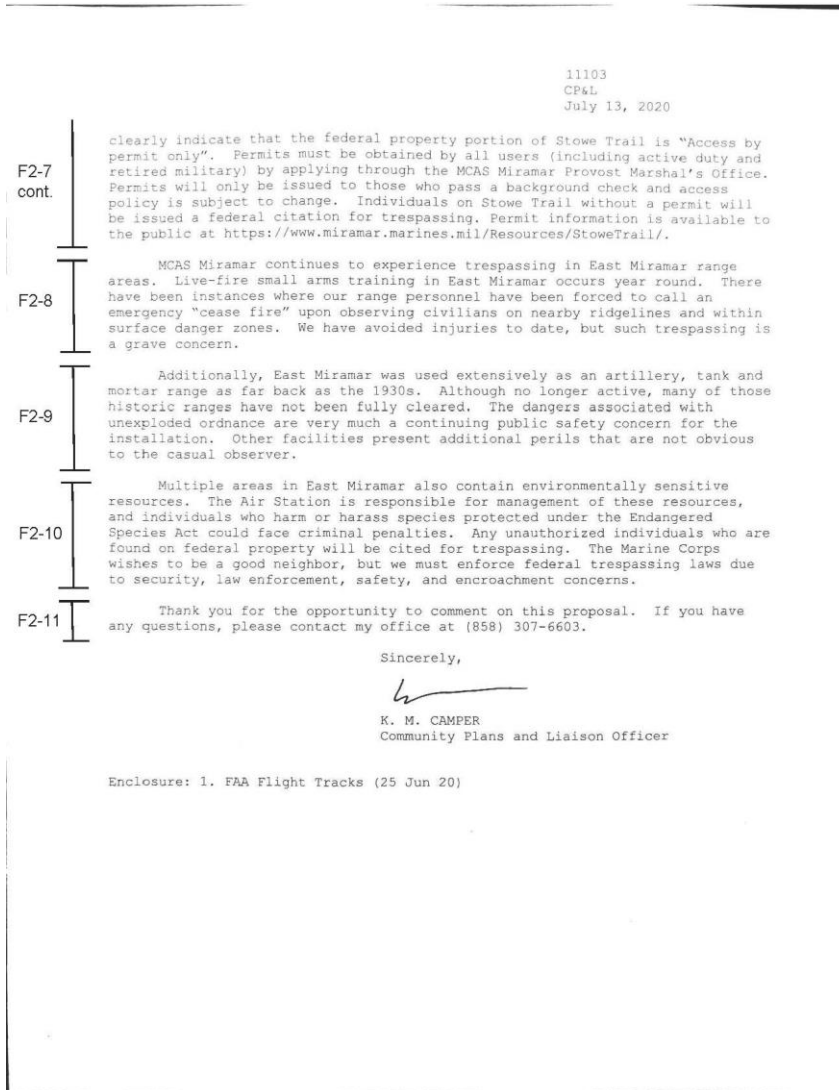
These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**F2-7:** This comment requests an addition to the description of Stowe Trail to include that the portion of the trail on federal land has access by permit only. The City agrees with this request. Section 3.4.1.3, Alternative Transportation Network, has been clarified as follows:

- **Stowe Trail:** This historic trail currently follows the western boundary of the project site from the northern end of the PDMWD property to the northwestern corner of the project site. Access to the existing off-site portion of the Stowe Trail that connects to Goodan Ranch/Sycamore Canyon County Preserve would be retained. Access to the portion of Stowe Trail located on MCAS Miramar is granted by federal permit only.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.





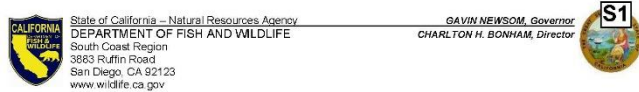
**F2-8:** This comment states that MCAS Miramar has experienced trespassing in East Miramar range areas. The proposed project does not propose development on the MCAS Miramar property. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**F2-9:** This comment states that East Miramar has been historically used for military munitions ranges and has not been fully cleared, posing a risk to trespassers in the area. The proposed project does not propose development on the MCAS Miramar property. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**F2-10:** This comment states that East Miramar contains environmentally sensitive resources that the air station is responsible for managing and that unauthorized individuals on federal property could face criminal penalties under federal trespassing laws. The proposed project does not propose development on the MCAS Miramar property. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**F2-11:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter S1: California Department of Fish and Wildlife, July 13, 2020



July 13, 2020

Chris Jacobs  
Principal Planner  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071  
[Cjacobs@CityofSanteeCa.gov](mailto:Cjacobs@CityofSanteeCa.gov)

**Subject:** Fanita Ranch (PROJECT)  
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)  
SCH# 2005061118

Dear Mr. Jacobs:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DEIR from the City of Santee (City) for the Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup> CDFW previously submitted comments in response to the Notice of Preparation (NOP) of the DEIR.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW ROLE**

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code. CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City has participated in the NCCP program and has used up the 5% interim impact allowance of coastal sage scrub within its jurisdictional boundaries. Over the past 20+ years the City has also prepared draft Subarea Plans (SAPs) under the Multiple Species Conservation Program (MSCP) Subregional Plan; however, a SAP has not yet been adopted by the City or approved/permitted by CDFW or the U.S. Fish and Wildlife Service (Service), jointly referred to as the Wildlife Agencies. The City and Wildlife Agencies continue to meet frequently in an effort to achieve a SAP which will be brought forward for public review.

**PROJECT DESCRIPTION SUMMARY**

**Proponent:** HomeFed Fanita Rancho LLC

**Objective:** The scope of work on the 2,638-acre Project site includes 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. The Habitat Preserve proposed within the Project footprint is 1,650.4 acres which is almost 80% of the City's total proposed Habitat Preserve in the

<sup>1</sup>CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

**S1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S1-2:** This comment provides information regarding the agency's role under CEQA and with the Natural Community Conservation Planning program. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S1-3:** This comment provides a summary of the project description. The summary is accurate with a few exceptions. The comment states that the Santee General Plan guidelines only allow the development of approximately 1,300 residential units on the project site and that a General Plan Amendment would be required. The Santee General Plan acknowledges 1,395 dwelling units on the project site as a baseline in the Housing Element Inventory of Sites. The comment states that the Habitat Preserve would be almost 80 percent of the City of Santee's (City's) total proposed conserved lands



Mr. Chris Jacobs  
City of Santee  
July 13, 2020  
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draft SAP. 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.

**Biological Setting:** Following Oberbauer's (2008) descriptions of vegetation communities of San Diego County, the Project site supports 2,051.57 acres of scrub and chaparral, 405.37 acres of grasslands/vernal pools/meadows/other herb communities, 0.54 acre of bog and marsh, 19.73 acres of riparian and bottomland habitat, 29.63 acres of woodland habitat, and 131.23 acres of disturbed and developed areas. As a result of Project buildout, 676.01 acres of scrub and chaparral, 183.63 acres of grasslands/vernal pools/meadows/other herb communities, 0.14 acre of bog and marsh, 5.99 acres of riparian and bottomland habitat, 2.42 acres of woodland habitat, and 59.71 acres of disturbed and developed areas will be permanently impacted.

**Location:** The 2,638-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.

**Timeframe:** The development of Fanita Ranch is proposed to occur in four phases with each phase taking approximately two to four years to complete. Construction is anticipated to begin in summer 2021 with buildout in approximately 10 to 15 years.

**COMMENTS AND RECOMMENDATIONS**

The City and Project fall within a Subarea planning unit within the larger San Diego Subregional MSCP, sometimes referred to as the "umbrella plan." The MSCP is a regional, landscape-level plan to preserve southwestern San Diego County's native habitats and wildlife for future generations. The Subregional 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 Federal Endangered Species Act, CESA, and the NCCP Act. Projects and subarea plans within the MSCP should support the goals and objectives of the umbrella plan and address the conservation needs of any Federally- or State-listed or proposed-listed, or otherwise sensitive species addressed by the MSCP. Consistent with NCCP process guidelines, CDFW has been reviewing and providing edits for the last two years on the City's 2018 draft SAP. The Project is identified as a Covered Project in the draft SAP and has always been recognized as an essential component to achieve a viable reserve system for the City's eventual NCCP program. This means that the proposed development will be balanced with the ecological needs of the 22 proposed Covered Species through conservation of large blocks of habitat and appropriate preserve design (including sufficiently wide connections between habitat blocks). This is critical for CDFW to be able to support findings pursuant to the NCCP Act and provide NCCP permit approval.

CDFW provided prior comments on the Project's NOP to the City on December 10, 2018. CDFW recommended that development be consolidated into a single polygon located largely in the southern portion of the site bordering already developed areas. By consolidating development and conserving large blocks of contiguous habitat, direct and indirect impacts from edge effects would be lessened. CDFW also recommended that the Project provide improved conservation of habitats used by coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycæna hemes*), and western spadefoot (*Spea hammondi*).

Coastal cactus wrens have an irregular history on the Project site, perhaps due to severe fires and the long timeframe required for cactus to reach a height capable of supporting wrens. Yet they have persisted on site, and appropriate design is necessary to contribute to a viable population and to "contribute to the recovery" of this species under an approved NCCP. Genetic studies have shown that wrens in Santee are related to populations along the San Diego River corridor, Fletcher Hills, Lake Jennings, and Poway. At present, the DEIR proposes to mitigate cactus wren suitable habitat at a 2:1 ratio, which CDFW believes is insufficient to both offset the proposed development impacts of Fanita Ranch and to further contribute to a source population that ensures cactus wrens will remain viable on the Project site and its immediate environs. CDFW is available and desires to continue to work with the City, Project applicant, and local experts to identify an implementable strategy to support cactus wren recovery on the Project site which will further connect and complement wren locations in Santee and the broader subregional MSCP.

Critical core habitat has been identified in the northern portion of the Project site for Hermes copper butterfly. CDFW recommends greater avoidance and conservation of Hermes larval host plant (spiny redberry, *Rhamnus crocea*) and favored nectaring plant, California buckwheat (*Eriogonum fasciculatum*), and seeks buffers of 300 feet between development and host plant

under the Draft Santee Multiple Species Conservation Program (MSCP) Subarea Plan. Rather, according to the Draft Santee MSCP Subarea Plan, Section 1.2.4, Covered Activities, the proposed project would account for approximately half (54 percent) of the 3,060 acres of proposed conservation lands. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S1-4:** This comment summarizes the MSCP regional framework as it relates to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S1-5:** This comment states that the California Department of Fish and Wildlife (CDFW) provided comments on the proposed project Notice of Preparation that recommended that the development be consolidated into a single polygon located in the southern portion of the site bordering already developed areas to lessen direct and indirect impacts from edge effects. This comment expresses a preference for a project footprint resembling the Modified Development Footprint Alternative analyzed in Section 6.2.3, Modified Development Footprint Alternative, of the EIR but does not raise a significant environmental issue regarding the adequacy

or accuracy of information provided in the EIR. Therefore, no further response is required.

Nonetheless, it is noted that Table 6-2, Summary of Impacts for Alternatives Compared to the Proposed Project, in Section 6.3, Environmentally Superior Alternative, summarizes all EIR alternatives compared to the proposed project. The EIR acknowledges that the Modified Development Footprint Alternative would have fewer biological impacts when compared to the proposed project, as suggested in the comment. However, the Modified Development Footprint Alternative would not accomplish four of the nine project objectives described in Chapter 3, Project Description. It is also noted that, while that alternative would lessen biological impacts, based on the opinion of the biological experts who prepared the analysis of the impacts and recommended the mitigation measures, the EIR concludes that, with the mitigation measures recommended in the EIR, there are no significant biological impacts of the proposed project.

- S1-6:** This comment states that the CDFW recommended in comments on the Notice of Preparation that the proposed project provide improved conservation of habitats used by coastal cactus wren (*Campylorhynchus brunneicapillus*), Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), and western spadefoot (*Spea hammondi*). This comment expresses a

recommendation but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. Nonetheless, the conservation of each of these species is specifically addressed in the EIR. Also, please refer to Thematic Responses – Hermes Copper Butterfly, Quino Checkerspot Butterfly, and Western Spadefoot.

- S1-7:** This comment summarizes the status of the coastal cactus wren on the project site, noting its persistence on site and the need for an appropriate design to contribute to a viable population and contribute to recovery under a Natural Community Conservation Plan. The comment states that the EIR’s proposed mitigation for coastal cactus wren suitable habitat at a 2:1 ratio is insufficient to both offset the proposed development impacts of the project and to further contribute to a source population that ensures coastal cactus wrens would remain viable on the project site and its immediate environs. The comment indicates that the CDFW is willing to work with the City, the applicant, and local experts to implement a strategy to support coastal cactus wren recovery on the project site in a way that would further connect and compliment coastal cactus wren locations in the City and the broader regional MSCP.

Based on the expert opinion of the biologists that prepared the Biological Resources Technical Report

(Appendix D), the City disagrees with the comment that the proposed mitigation is insufficient to offset project impacts to coastal cactus wren. Based on coastal cactus wren surveys conducted in 2017, the project site supports five clusters of coastal cactus wren (see Table 4.3-4, Special-Status Wildlife Species Observed on the Project Site and Off-Site Improvement Area). The project site supports 0.99 acre of suitable cactus patches for the coastal cactus wren. Direct impacts include removal of 0.57 acre of suitable cactus patches and three of the five occupied clusters. Potentially significant impacts to coastal cactus wren would be reduced to a less than significant level through the proposed project's on-site Habitat Preserve outlined in Mitigation Measure BIO-1 (Preserve Management Plan), which would conserve 0.42 acre of suitable cactus patches containing two coastal cactus wren clusters and provide for long-term management and monitoring of the coastal cactus wren and its habitat in the Habitat Preserve; Mitigation Measure BIO-2 (Upland Restoration Plan), which would restore 0.02 acre of temporary impacts to cactus patches; Mitigation Measure BIO-14 (Nesting Bird Survey), which would require nesting bird surveys; Mitigation Measure BIO-16 (Coastal Cactus Wren Habitat Management); and Mitigation Measure BIO-9 (Habitat Preserve Protection), which would require planting of cactus patches along brush management zones.

Mitigation Measures BIO-16 and BIO-1 are the core of the mitigation strategy to reduce project impacts to the coastal cactus wren to less than significant. As stated in Mitigation Measure BIO-16, the habitat restoration and enhancement, which would occur prior to construction to provide maximum amount of time for maturation of cactus, for coastal cactus wren would be similar in extent and density to currently occupied patches to be impacted and shall show use by coastal cactus wren prior to clearing of currently occupied habitat. Mitigation Measure BIO-16 is detailed in Section 4.3.5.1, Candidate, Sensitive, or Special-Status Species, and in Section 1.1, Compliance with Mitigation Measure BIO-12 [BIO-16 in EIR], Coastal Cactus Wren, in Appendix Q, Upland Restoration Plan, in the Biological Resources Technical Report (Appendix D). Based on project impacts to 0.57 acre of suitable habitat, a 2:1 mitigation ratio resulting in a total of 1.14 acres of habitat enhancement and restoration is proposed for mitigation in the EIR. However, based on ongoing collaborative discussions with the wildlife agencies, the mitigation ratio has been expanded to 3:1 for a total of 1.71 acres and has been revised in the EIR and Biological Resources Technical Report (Appendix D). Mitigation Measure BIO-16 (Biological Resources Technical Report [Appendix D] Mitigation Measure BIO-12) has been revised as follows:



**BIO-16: Coastal Cactus Wren Habitat Management.**

Coastal cactus wren is a Covered Species under the Draft Santee Multiple Species Conservation Program Subarea Plan. Because suitable and occupied habitat for this species shall be impacted by grading and construction of the proposed project, habitat enhancement and restoration of coastal cactus wren habitat shall occur. Based on project impacts to 0.57 acre of suitable habitat, a ~~2:1~~ 3:1 mitigation ratio resulting in a total of ~~1.14~~ 1.71 acres of habitat enhancement and restoration would be required for mitigation. This habitat restoration and enhancement is outlined within Upland Restoration Plan (Appendix Q), and the Preserve Management Plan (Appendix P) of the Biological Resources Technical Report for the Fanita Ranch Project. This habitat shall need to be similar in extent and density to currently occupied patches to be impacted and shall show use by coastal cactus wren prior to clearing of currently occupied habitat. Use is minimally intended to prove that impacted coastal cactus wren have identified where these patches are located so that they can colonize them once their current habitat patches are cleared. It is anticipated that restoration and enhancement activities shall begin prior to construction, where practicable, to provide the most amount of time for maturation.

(The remainder of EIR Mitigation Measure BIO-16 [Biological Resources Technical Report (Appendix D) Mitigation Measure BIO-12] remains the same.)

Figure 6 of Appendix Q (Upland Restoration Plan) Biological Resources Technical Report (Appendix D) depicts two areas that are proximate to and south of the existing coastal cactus wren clusters. These areas were chosen because of their visual proximity to existing coastal cactus wren and slope. One area is 24.5 acres in size, while the other is 28.8 acres. Cactus planting in these blocks at a minimum would meet the 3:1 request. It is expected that restoration and enhancement activities would begin prior to construction, where practicable, to provide the most amount of time for maturation before impacts occur. The initial planting and maintenance program is planned to occur over a 2-year period, selecting suitable sites based on several criteria, including slope aspect, existing habitat suitability (based on prioritizing areas where cacti were present and additional space for enhancement), soils conditions, proximity to existing occupied cactus patches, and access for planting and maintenance. Because not all sites are expected to be successful, the first year of enhancement and restoration would cover an area exceeding 1.71 acres (based on the revised 3:1 mitigation ratio), and the second year would focus maintenance on the sites with the greatest potential to

develop into suitable habitat. Sites that develop suitable coastal cactus wren habitat would be monitored annually for cactus wren use or occupation for 5 years, although, as described in Mitigation Measure BIO-1, regular coastal cactus wren surveys would be conducted in perpetuity in the Habitat Preserve. There is a broad documented history of successful coastal cactus wren habitat enhancement and restoration in the San Diego region based on several studies that cactus restoration is successful in re-establishing coastal cactus wren presence or occupancy (Conlisk et al. 2005; Dodero 2015; Martin 2014; McMillan et al. 2011; Preston and Griswold 2011). Successful coastal cactus wren restoration project sites in the San Diego region provided by Dudek Habitat Restoration Specialist Scott McMillan include State Route 125 Vernal Pool and Quino Habitat Restoration Project (California Department of Transportation), State Route 125 Johnson Canyon Habitat Restoration Project (California Department of Transportation), State Route 125 Lake Jennings Cactus Wren Restoration Project (California Department of Transportation), Dennery Vernal Pool and Quino Habitat Restoration Project (California Department of Transportation), Harris Fire Habitat Restoration and Enhancement (San Diego National Wildlife Refuge), Shinohara Habitat Restoration and Enhancement (San Diego National Wildlife Refuge (Chollas Creek Cactus Wren Habitat Restoration (Groundworks Cholla and San

Diego Association of Governments [Environmental Mitigation Program], and successful coastal cactus wren habitat restoration throughout the Otay Ranch Preserve and other parts of the City of Chula Vista, including Salt Creek, Wolf Canyon, and Poggi Canyon (RECON) (S. McMillan, pers. comm. 2020).

Mitigation Measure BIO-1 (Preserve Management Plan) provides for regular surveys for coastal cactus wren at 5-year intervals (see Section 4.2.5, Species Surveys, in Appendix P in the Biological Resources Technical Report [Appendix D]) in conjunction with surveys for coastal California gnatcatcher (*Polioptila californica californica*), which has overlapping habitat requirements. A detailed mapping and inventory of cactus scrub habitat on the Habitat Preserve would be completed and maintained using the same methods and protocols used by the San Diego Management and Monitoring Program (SDMMP) to map cactus patches on other preserve lands in San Diego County (TNC 2015). This information would serve as an update of cactus scrub habitat on the Habitat Preserve, support fire management planning, serve as a benchmark for restoration if a fire occurs, and facilitate the exchange of information with other regional entities, including SDMMP, on how to address cactus scrub habitat distributions. In addition, every 3 years, a habitat evaluation and threats assessment would be conducted

using a protocol similar to the SDMMP Rare Plant Monitoring Protocol (IMG form) (SDMMP 2017). The threats assessment would include an evaluation of the vegetation as it pertains to the needs of coastal cactus wren (e.g., native or non-native vegetation overtopping cactus, low cactus density). Photo monitoring and qualitative site visits of each cactus scrub patch location in the Habitat Preserve would be completed.

Mitigation Measure BIO-1 also provides for coastal cactus wren management (see Section 4.2.6.2, Covered Wildlife Species, in Appendix P in the Biological Resources Technical Report [Appendix D]), which is based on Section 7.2.6, Management Actions and Adaptive Management Strategies, of the Draft Santee MSCP Subarea Plan. Coastal cactus wren management is based on a set of objectives, including protecting occupied habitat and adaptively managing the habitat based on monitoring results. Habitat protection includes actions to minimize disturbances and edge effects, such as scheduling public activities beyond historical trail use outside the coastal cactus wren breeding season and managing invasive plant species, implementing fire management, and controlling access to the parts of the Habitat Preserve that support the coastal cactus wren. Adaptive management actions would include the

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S1-8 cont. patches wherever possible to reduce potential edge effects. CDFW recognizes that the most recent surveys in 2016 did not identify Hermes copper on site, but the Project site combined with contiguous surrounding lands to the east (e.g. Cheyenne property and Lakeside Downs Habitat Conservation Area) and west (e.g. Mission Trails Regional Park and Marine Corps Air Station Miramar) are nonetheless believed to be critical to recover Hermes populations in San Diego County.

S1-9 One of the main goals of the draft SAP is to conserve and manage Quino checkerspot butterfly habitat within and across the northern portion of the Project site in order to maintain metapopulation dynamics within the Central San Diego Recovery Unit (USFWS 2008). This has been of particular focus in ongoing discussions between the Wildlife Agencies and representatives of the City and Project applicant. At present, the DEIR mitigates Quino at a level which CDFW believes is insufficient to both offset the proposed impacts to optimal Quino habitat and further contribute to a meaningful population that ensures Quino will remain viable on the Project site and its immediate environs. CDFW recommends broadening the east/west connection across the northern portion of the Project site in order to maintain habitat connectivity with Mission Trails Regional Park and Marine Air Corps Station Miramar to the west, San Vicente and Boulder Oaks to the northeast, and Sycamore Canyon/Goodan Ranch to the north.

S1-10 Known breeding habitat for the western spadefoot is found predominantly in the northwest corner of the Project site, with additional scattered breeding habitat found in the central, southern, and western areas of the site. Protecting breeding sites and adjacent upland foraging habitat, minimizing direct mortality, and providing opportunities for dispersal of existing individuals between breeding sites are important actions that will help ensure the long-term viability of spadefoot on the Project and adjacent preserved areas (Rochester et al. 2017). Based on the recommendations from the Independent Science Advisor Report (Rochester et al. 2017), CDFW would like to continue to work with the City on Project development and preserve design in order to protect known breeding sites, maintain connectivity between breeding sites and minimize barriers to movement (roads and trails), incorporate multiple routes between breeding pools to avoid complete failure if the only dispersal route is destroyed, and avoid light pollution near breeding sites which can be disruptive to nocturnal amphibian breeding behavior.

S1-11 CDFW is aware that the project proponent and the City do not support a project design which provides greater conservation in the northern portion of the property and clusters housing in more southern areas of the property. Such a design has been advocated for by the Wildlife Agencies and would be far more beneficial to conservation of species of greatest concern to the Santee NCCP. As an alternative, and in pursuit of completing an NCCP, the Wildlife Agencies have been meeting regularly with representatives of the City and the Project. Efforts have concentrated on agreeing to a Project site design favored by the City and project proponent that provides greater protection of resources for key species, lessens edge effects, and provides better connectivity between lands within the City and adjoining areas to the north and east. These criteria are believed to be essential elements to be able to issue state and federal permits, and particularly to include coverage of the four species identified above. Unfortunately, a potential development footprint representing the current discussions was not included as an alternative in the DEIR. For this reason, the Department herein emphasizes its desire to continue meeting with the City, Project representatives, and the Service to achieve a project design which satisfies requirements for the NCCP and sufficiently meets development objectives.

S1-12 In the absence of an alternative in the current DEIR which is likely to meet the needs of all parties, CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. These comments also address inconsistencies with the draft SAP.

I. Project Description and Related Impact Shortcoming

COMMENT #1: Support of Project Alternative

S1-13 Issue: The City is asking for coverage of 22 species in their draft SAP and the Project site encompasses most of the undeveloped open space for the proposed Covered Species remaining within the City's limits. The status of the species being proposed for coverage has not improved over the last decade. CDFW has significant concerns with the Project design alternatives with respect to the conservation and recovery of four of the 22 proposed Covered Species in the draft SAP: coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot. On March 24, 2020, the Wildlife Agencies distributed drafts to the City and Project applicant of "Quino Checkerspot Butterfly (QCB) Conservation Standards", "Hermes Copper Butterfly (HCB) Conservation Standards", a map showing QCB and HCB suitable habitat, and a Service-proposed edited Fanita Ranch site plan. This proposed site plan reduced the development

preserve manager developing adaptive management recommendations based on monitoring and implementing adaptive management strategies, including but not limited to situations where there has been a significant disturbance of suitable habitat, conducting invasive species management near known occupied habitat based on established management threshold metrics, preventing net loss of suitable habitat, and conducting post-fire evaluation and restoration.

**S1-8:** This comment states that “critical core habitat” for Hermes copper butterfly has been identified in the northern part of the project site and that the CDFW recommends greater avoidance and conservation of the species’ larval host plant, spiny redberry (*Rhamnus crocea*) and its favored nectaring plant, California buckwheat (*Eriogonum fasciculatum*), and recommends a buffer of 300 feet between development and host plant patches. This comment expresses a recommendation but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Please refer to Thematic Response – Hermes Copper Butterfly.

Nonetheless, it should be reiterated that the County of San Diego protocol surveys performed in 2016 and 2020

(Dudek 2020) for Hermes copper butterfly were negative and the species is assumed to have been extirpated from the site, likely due to the 2003 Cedar Fire. Impacts to this species and its host plant species would be reduced to less than significant primarily through Mitigation Measure BIO-1 (Preserve Management Plan), which would include preservation of 94.77 acres of potentially suitable habitat and two historical occurrence locations for the species and require in-perpetuity management of the Habitat Preserve, and Mitigation Measure BIO-18 (Restoration of Suitable Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly), which includes a combination of in-perpetuity management of the Habitat Preserve and restoration/enhancement and creation of suitable habitat areas that include specific standards or guidelines on vegetation management (see Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species). Although Mitigation Measures BIO-1 and BIO-18 are the only two cited mitigation measures in the EIR to reduce impacts to less than significant, additional mitigation measures that would generally benefit the Hermes copper butterfly include land use adjacency guidelines (Mitigation Measure BIO-6), Stormwater Pollution Prevention Plan (Mitigation Measure BIO-7), construction monitoring by an approved biologist (Mitigation Measure BIO-8), Habitat Preserve Protection (Mitigation Measure BIO-9), weed control treatments (Mitigation Measure BIO-10), Argentine ant (*Linepithema humile*) controls (Mitigation Measure BIO-

11), wildlife protection (Mitigation Measure BIO-20), and fire protection (Mitigation Measure BIO-21). Therefore, Hermes copper butterfly, including the amount of suitable habitat conserved, is adequately mitigated for and addressed in the EIR.

- S1-9:** The comment states that one of the main goals of the Draft Santee MSCP Subarea Plan, according to the CDFW, is to conserve and manage Quino checkerspot butterfly habitat. This comment states that the EIR mitigates Quino checkerspot butterfly at a level that the CDFW believes is insufficient to both offset the proposed impacts to optimal Quino checkerspot butterfly habitat and further contribute to a meaningful population that ensures Quino checkerspot butterfly would remain viable on the project site and its immediate environs. The comment also states the CDFW's recommendation that the east-west connection across the northern portion of the project site be broadened to maintain habitat connectivity with Mission Trails Regional Park and Marine Corps Air Station Miramar to the west, San Vicente and Boulder Oaks to the northeast, and Goodan Ranch/Sycamore Canyon County Preserve to the north.

Based on the expert opinion of the biologists who prepared the Biological Resources Technical Report (Appendix D), the City disagrees with the comment that the proposed mitigation is insufficient to offset project impacts to Quino checkerspot butterfly. First, it should be noted that Quino checkerspot has not been observed on the project site since



2005 after over 400 person-days of survey effort. Nonetheless, mitigation for impacts to suitable habitat for Quino checkerspot butterfly would include a combination of habitat preservation, restoration/enhancement and creation of suitable habitat areas, and in-perpetuity management of the Habitat Preserve, primarily through Mitigation Measures BIO-1 (Preserve Management Plan) and BIO-18 (Restoration of Suitable Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly) (see Table 4.3-8a). Habitat preservation and management includes approximately 1,096.57 acres of suitable Quino checkerspot butterfly habitat, removal of non-native grasses, weedy material, and duff layers and the supplemental planting of host plant species so that habitat in the Habitat Preserve is more suitable for Quino checkerspot butterfly. The focus on management of habitat would open up habitat and access to host plants that Quino checkerspot does not currently enjoy over much of the site and without management would get worse. Restoration/enhancement and creation of suitable habitat areas within the Habitat Preserve are specified in the Preserve Management Plan (PMP). Specifically, the PMP identifies proposed treatment blocks for restoration/enhancement (see PMP Figure 7-a, Potential Restoration Treatment Areas). The restoration/enhancement program would be implemented as a component of adaptive management for the Quino checkerspot butterfly and its habitat. As stated in the PMP, the preserve manager would develop adaptive management recommendations specific to

the species based on monitoring, such as increased fencing, using alternative host plant seed mixes, or changing the geographic areas for management that would be included in the annual report submitted to the City. The preserve manager would also consult with the City and regional entities, as applicable, to determine where the viability and the need for Quino checkerspot butterfly habitat enhancement is appropriate in the Habitat Preserve. The PMP also includes two objectives for habitat management for occupied sites should the Quino checkerspot butterfly be documented on site: (1) manage invasive plant species in occupied Quino checkerspot butterfly, including implementing invasive plant species controls if invasive species in occupied habitat exceed 10 percent cover or increase by 25 percent or more from the previous survey; and (2) protect occupied Quino checkerspot butterfly habitat from unauthorized by actions such as exclusionary fencing and signage.

Based on habitat modeling and proposed mitigation, the EIR concludes that the proposed project would mitigate impacts to Quino checkerspot butterfly to less than significant. Although Mitigation Measures BIO-1 and BIO-18 are the only two cited mitigation measures in the EIR to reduce impacts to less than significant, additional mitigation measures that would generally benefit the Quino checkerspot butterfly include land use adjacency guidelines (BIO-6), Stormwater Pollution Prevention Plan (BIO-7),

construction monitoring by an approved biologist (BIO-8), Habitat Preserve Protection (BIO-9), weed control treatments (BIO-10), Argentine ant controls (BIO-11), wildlife protection (BIO-20), and fire protection (BIO-21). Therefore, impacts to Quino checkerspot butterfly are adequately mitigated for and addressed in the EIR.

Please also refer to Thematic Response – Quino Checkerspot Butterfly.

Additionally, this comment states that the CDFW recommends broadening the east–west connection across the northern portion of the project site to maintain habitat connectivity to the north. This comment expresses a recommendation for a project design revision but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. However, Table 6-2 in Section 6.3, Environmentally Superior Alternative, summarizes all EIR alternatives compared to the proposed project. In addition, the comment appears to analyze the northern wildlife corridor and habitat connectivity out of context of the existing off-site conditions north of the project site and disregards the effectiveness of mitigation measures to manage deleterious edge effects at the development–preserve interface. Because the Habitat Preserve abuts extensive preserved open space to the north and west, the regional wildlife corridors are functionally much broader than just the widths of Habitat Preserve on the project site,

as illustrated on Figure 4.3-10, Regional Wildlife Corridors. Therefore, the Habitat Preserve along the western and northern boundary contributes to the regional wildlife movement and habitat connectivity within approximately 5 miles of the project site, including Goodan Ranch/Sycamore Canyon County Preserve to the north, San Diego County open space to the east, and Marine Corps Air Station Miramar open space to the west. From a regional perspective, the proposed project, without the need to expand the northern corridor, would not substantially constrain opportunities for habitat connectivity and movement corridors for Quino checkerspot butterfly. Also, please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

- S1-10:** This comment identifies locations of known breeding habitat for western spadefoot on the project site and states that protection of such habitat and adjacent upland foraging habitat, as well as minimizing direct mortality and providing opportunities for dispersal between breeding sites, is important. The comment states that the CDFW would like to continue to work with the City on project development and preserve design to protect known western spadefoot breeding sites, maintain connectivity between breeding sites and minimize barriers to movement, incorporate multiple routes between breeding pools to avoid complete failure if the only dispersal route is destroyed, and avoid light pollution near breeding sites. This comment expresses a

request to continue to work with the City but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

However, it should be noted that Appendix R, Vernal Pool Mitigation Plan, and Appendix P, Preserve Management Plan, in Appendix D, Biological Resources Technical Report, of the EIR, were provided during the EIR public review period and are included as mitigation measures in the EIR as Mitigation Measure BIO 1 (Preserve Management Plan) and Mitigation Measure BIO-12 (Vernal Pool Mitigation Plan). The Preserve Management Plan and Vernal Pool Mitigation Plan include preconstruction surveys, translocation, in-perpetuity preservation of western spadefoot occupied pools with adaptive management strategies, and habitat enhancement and creation for western spadefoot in the Habitat Preserve. These plans are subject to approval by the wildlife agencies, including the CDFW. Mitigation Measure BIO-6 (Land Use Adjacency Guidelines) includes a lighting measure: Lighting of all developed areas adjacent to the Habitat Preserve would be directed away from the Habitat Preserve wherever feasible and consistent with public safety. Low-pressure sodium lighting shall be used whenever possible. Additional mitigation measures would help reduce impacts to less than significant, including Mitigation Measure BIO-13 (Western

Spadefoot Relocation) and Mitigation Measure BIO-19 (African Clawed Frog Trapping).

- S1-11:** The comment states that a project design that provides greater conservation in the northern portion of the property and clusters housing in more southern areas of the property has been advocated for by the wildlife agencies and discussed with the City and applicant. Please refer to response to comment S1-5, which addresses the same issue raised in this comment.

The comment also states that another alternative was recently discussed with the City and applicant (i.e., a U.S. Fish and Wildlife Service (USFWS) revised site plan was distributed to the City and applicant on March 24, 2020) but was not included in the EIR. Although the recently discussed alternative proposed by the USFWS was not included in the EIR alternatives analysis, the EIR did evaluate a reasonable range of alternatives to the proposed project according to CEQA requirements in Chapter 6, Alternatives. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- S1-12:** This comment provides an introduction to the comment section. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

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S1-13 cont. areas in the northern portion of the Fanita Commons and Vineyard Village development communities as most of the suitable habitat for these species and species' occurrences are in the northern half of the Project site. On June 3, 2020, the Wildlife Agencies distributed edits to the City and Project applicant to the coastal cactus wren surveys, impacts, and mitigation measures from the Biological Technical Report (BTR) of the DEIR. Our edits were therefore not reflected in the May 29, 2020 DEIR and the Wildlife Agencies have not received feedback from the Project applicant or the City.

S1-14 By consolidating development in the southern half of the site and moving it away from these sensitive species and their habitat, the ecological needs of these species would continue to be met. The creation of a large, contiguous Habitat Preserve in the northern portion of the site would have substantially reduced edge effects, support sustainable populations, maintain habitat diversity, and allow movement and gene flow within the SAP area and linkages to adjacent habitat areas outside of the City's boundaries. These guidelines apply not only to these four species, but to all 22 proposed Covered Species within the draft SAP. As currently proposed, the Habitat Preserve associated with the Project would consist of one relatively large polygon in the southern portion of the site surrounded by residential development. The proposed roads, trails, 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.

S1-15 **Specific impact:** CDFW is concerned about the potential Project-related direct and indirect effects on the 22 proposed Covered Species in the draft SAP, in particular on coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and the western spadefoot. The current Project footprint removes sensitive habitat, narrows habitat linkages, and intersects the landscape with numerous buildings, and utility lines and preserve designs do not maintain the ecological integrity of the existing large habitat blocks, and ecosystem function on a local and regional scale. As an example, coastal cactus wren is found in increasingly disjoint populations in San Diego County, both within the City and in the surrounding areas. Removing habitat and decreasing the wren's ability to disperse creates genetic sinks where populations are susceptible to reduced health and increased mortality.

S1-16 **Recommendation #1:**

S1-17 **To minimize significant impacts:** CDFW strongly recommends that the Project be modified from the preferred project footprint to improve conservation by increasing avoidance of the most important sensitive species habitat areas, creating as large of habitat blocks for those critical resource areas (i.e., host plants) as reasonably possible, reducing habitat edge and fragmentation, and improving habitat corridors. These recommendations are guiding principles of the draft SAP that are inconsistent with most of the alternatives put forth in the DEIR. Five alternatives were provided in the DEIR. Only one of the development alternatives, the Modified Development Footprint, is in alignment with the layout CDFW proposed in their 2018 NOP comment letter in removing proposed development in the northern part of the site and consolidating development towards the southern half of the property in proximity to existing development. Based on the CDFW's knowledge of the species, preserve design, and the needs for a viable Santee MSCP capable of meeting the requirements of issuance of an NCCP covering the full range of species desired by the City, of the development alternatives, CDFW recommends approval of the Modified Development Footprint alternative as described in the DEIR. CDFW would also support the No Project alternative at this point in time, and until such time as a site design can be agreed upon by all parties that would ensure adequate conservation, protection, and management of key species of concern to the City's SAP.

S1-18 **COMMENT #2: Mitigation Required by CEQA**

**Issue:** Per CEQA Section 15370, mitigation is required by lead agencies as part of the approval of a project in order to substantially lessen or avoid the significant adverse effects in the environment that may occur as a result of the project. The DEIR proposes Project mitigation and minimization consistent with what is being proposed in the 2018 draft SAP. This is problematic because the draft SAP has yet not been approved or permitted. CDFW is still reviewing the draft SAP and having discussions with the City and Project applicant over whether the proposed mitigation ratios will deliver a Habitat Preserve that meets NCCP permit issuance criteria.

S1-19 **COMMENT #3: Inconsistencies with the Current Draft SAP**

**Issue:** In Section 4.3 (Biological Resources) of the DEIR, it states that, "The proposed project design is consistent with the Draft Santee MSCP Subarea Plan through specific adherence to conditions of coverage and mitigation/conveyance requirements for hardline Covered Projects as defined in the Draft Santee MSCP Subarea Plan (City of Santee 2018)." The DEIR continues to

**S1-13:** The comment summarizes the number of species the City is asking for coverage (22) under the Draft Santee MSCP Subarea Plan and states that the status of these species has not improved over the last decade. This comment states that the CDFW has significant concerns with the project design alternatives with respect to the conservation and recovery of 4 of the 22 proposed Covered Species in the Draft Santee MSCP Subarea Plan: coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Additionally, the comment states that the USFWS provided edits to the proposed site plan, which reduced the development areas in the northern portion of the site, that was distributed to the City and applicant on March 24, 2020. Please refer to responses to comments S1-5 and S1-11, which address the same issue raised in this comment.

The comment also states that on June 3, 2020, the wildlife agencies provided input on the coastal cactus wren surveys, impacts, and mitigation measures in the EIR and have not yet received feedback from the City or the applicant. The City disagrees with this statement. The City provided a memorandum prepared by its consultant ICF, to the CDFW and USFWS on April 16, 2020, that was intended to provide

information and data to support a discussion related to the coverage of the coastal cactus wren under the Draft Santee MSCP Subarea Plan. The wildlife agencies returned the memorandum nearly 2 months later. Input was provided in redline/strikeout and comment format in the body of the memorandum with revisions and comments inserted by multiple staff from each agency and included not only questions, comments, and formatting suggestions, but practical disagreements between the agencies themselves (e.g., taxonomic status). The wildlife agencies' input was in regarding coverage under the Draft Santee MSCP Subarea Plan and not the EIR or Biological Resources Technical Report (Appendix D). The City and wildlife agencies have since been in ongoing discussions regarding the finer points of coastal cactus wren coverage in the Draft Santee MSCP Subarea Plan since the memorandum was supplied to them. Accordingly, the City does not agree with the comment's statement that the wildlife agencies have not received feedback on their edits to the memorandum.

On July 28, 2020, a species expert from the U.S. Geologic Survey (USGS) participated in a meeting of the stakeholders on the general coastal cactus wren status in the region and vicinity, genetic studies from the region, connectivity and threats, and restoration input. Several take-away points were that the project site is part of an intact and well-functioning genetic cluster, the Lake Jennings Genetic Cluster, which includes populations in the Lake Jennings area, El



Cajon/Fletcher Hills area, Navajo Canyon area, Mission Trails area, South Poway area, and Fanita Ranch area. It should be noted that the analysis did not include samples from the project site or South Poway site; however, it was determined reasonable to expect that they are all part of the same genetic unit. All areas receive genetic flow as evidenced by their genetic relatedness (Barr et al. 2015). Within this cluster, the project site is central and probably is a good candidate to receive and provide coastal cactus wren within the genetic cluster. (The City notes that all the cactus on site burned in the 2003 Cedar Fire and lost the resident coastal cactus wren and that, until about 6 years ago, no coastal cactus wren was present on the project site; therefore, the current population likely came from one of these neighboring areas.) Dispersing cactus wrens move less than 4 kilometers from their natal site, with the majority moving less than 1 kilometer, and a few moving up to 12 kilometers. Movement occurs in more natural habitat and in and around development where natural habitat is present, though cactus resources, minimally 1 meter tall, are needed for nesting. Coastal cactus wren are generally tolerant of trails as long as pets are kept on leash and trails are designed to circumvent cactus patches (i.e., do not penetrate through cactus stands). The cactus patches generally insulate them from hiker pressures. The USGS offered that they thought there was a low likelihood of success to promote connectivity to the Poway area due to an apparent lack of presence (other than the South Poway location) and little remaining habitat. Of

course, more aggressive habitat restoration in certain parts of Poway and its surroundings could change that assessment. Similarly, the USGS thought that enhancing connectivity in the Lake Jennings genetic cluster would probably provide little measurable benefit since coastal cactus wren currently move well through the cluster. The USGS did think that the best way to support the species was to bolster the proposed project population so that it could serve as a core population, which could be accomplished through preservation of current habitat and coastal cactus wren and restoration and enhancement of habitat, which is exactly what is proposed as mitigation in Mitigation Measure BIO-1.

The EIR acknowledges that the proposed project would impact occupied coastal cactus wren habitat but also proposes adequate mitigation through Mitigation Measures BIO-1 and BIO-16 at an increased minimum 3:1 ratio and includes currently occupied coastal cactus wren habitat in the Habitat Preserve. Additionally, there is considerably less suitable coastal cactus wren habitat in the northern portion of the proposed project. The most suitable habitat for this species is in the southern 900-acre block of the Habitat Preserve. This area supports regenerating and currently unoccupied cactus clusters. The pre-Cedar Fire occupied area is now supporting regenerating cactus patches containing prickly pear and cholla species. Restoration, enhancement, and in-perpetuity management of the Habitat

Preserve related to the implementation of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) would provide the opportunity to grow a robust coastal cactus wren population that can support the viability of the rest of the Lake Jennings genetic cluster.

The redline/strikeout edits and comments provided to the April 16, 2020, ICF memorandum do not constitute comments on the EIR, were not described as such by the staffs of the wildlife agencies who provided them, and were not submitted to the City in accordance with the CEQA comment process. The City is not directly responding to the edits and comments on that memorandum in this response. However, as noted above, the City's consultants have been engaged in extensive dialogue with the wildlife agencies in connection with this species, which dialogue is anticipated to be continuing.

While this comment does not raise a significant environmental issue regarding the adequacy or accuracy of information in the EIR, discussions have been ongoing with the wildlife agencies, by both the applicant and the City, regarding many of the issues raised about coastal cactus wren in this comment and the above-referenced memorandum as it relates to the Draft Santee MSCP Subarea Plan.

- S1-14:** This comment states that the ecological needs, including reduced edge effects, support for sustainable populations, maintenance of habitat diversity, and movement and gene flow, for Covered Species would be met by consolidating development in the southern half of the site and moving it away from these sensitive species and their habitat. Please refer to response to comment S1-5, which addresses the same issue raised in this comment.
- S1-15:** This comment states that the CDFW is concerned about the potential project-related direct and indirect effects based on the proposed design on the 22 proposed Covered Species in the Draft Santee MSCP Subarea Plan, in particular on coastal cactus wren, Quino checkerspot butterfly, Hermes copper butterfly, and the western spadefoot. Generally, project-related direct and indirect impacts to wildlife species and the mitigation required to reduce impacts to wildlife species to less than significant under CEQA requirements are addressed in Section 4.3.5, Project Impacts and Mitigation Measures. Please refer to response to comment S1-7 for coastal cactus wren, response to comment S1-8 for Hermes copper butterfly, response to comment S1-9 for Quino checkerspot butterfly, and response to comment S1-10 for western spadefoot, each of which addresses the same issues raised in this comment. Please also refer to Thematic Responses – Western Spadefoot, Hermes Copper Butterfly, and Quino Checkerspot Butterfly.

**S1-16:** This comment states that removing coastal cactus wren habitat and decreasing the species' ability to disperse creates a genetic sink where populations are susceptible to reduced health and increased mortality. By providing 3:1 mitigation for impacted occupied cactus patches, population dynamics, including genetic exchange through dispersal both on site and with off-site populations, would at minimum be maintained. Please refer to responses to comments S1-7 and S1-13 for coastal cactus wren, which address the same issues raised in this comment. Please also refer to Thematic Response – Wildlife Movement and Habitat Connectivity, which addresses the ability for genetic exchange and diversity of species to be maintained with the implementation of Mitigation Measure BIO-1. Additionally, it should be noted that all of the cactus areas burned in the 2003 Cedar Fire and all cactus and coastal cactus wren occurring on the site colonized sometime in the last 4 to 6 years. Finally, the USGS considers the site a part of a larger thriving genetic cluster that moves in and around development; therefore, the genetic sink concern stated in the comment is not applicable to this site. Please refer to response to comment S1-13. Based on the opinion of the biological experts who prepared the analysis, the EIR describes the potential direct and indirect impacts to this species, recommends mitigation, and concludes that the impacts are less than significant with mitigation.

**S1-17:** This comment states that the CDFW recommends modification of the proposed project to improve conservation consistent with the principles of the Draft Santee MSCP Subarea Plan. The comment states that only the Modified Development Footprint Alternative, as described in Chapter 6, is in alignment with the layout proposed by the CDFW in their comments on the Notice of Preparation. Please refer to response to comment S1-5, which addresses the same issue raised in this comment.

The comment also includes a statement that the CDFW would support the No Project/No Build Alternative until all parties agree upon the project design. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S1-18:** This comment states that, per CEQA Guidelines, Section 15370, mitigation is required by lead agencies as part of the approval of a project in order to substantially lessen or avoid the significant adverse effects in the environment that may occur as a result of the project. The comment states that the EIR proposes project mitigation and minimization consistent with the Draft Santee MSCP Subarea Plan. The comment also states that this is problematic because the Draft Santee MSCP Subarea Plan has not yet been approved or permitted. The EIR provides mitigation to reduce impacts to less than significant in accordance with CEQA

requirements. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is consistent with the preserve design criteria in the MSCP Plan (City of San Diego 1998) and is used as the guidance document for projects occurring within the City of Santee. Therefore, the EIR is also consistent with the Draft Santee MSCP Subarea Plan, which would serve as a habitat conservation plan pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act, and as an Natural Community Conservation Plan pursuant to the California Natural Community Conservation Planning Act of 1991. If the Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through federal Endangered Species Act Section 7 or an individual Section 10 permit; take authorization is not a CEQA issue. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Please refer to Thematic Response – Santee MSCP Subarea Plan.

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S1-19 cont. say the current Project footprint provides a greater level of conservation than what is required by the draft SAP pursuant to the "umbrella" MSCP. A significant shortcoming of this statement is that the City proposes coverage of three species (Quino, Hermes copper, western spadefoot), which were not covered by the MSCP Subregional Plan. Therefore, it is not appropriate to conclude that a hardlined project has sufficiently met all requirements of an overarching umbrella plan which did not establish coverage criteria for those additional species. It is further noted that other MSCP jurisdictions that have received NCCP permits did not receive coverage of the three additional species identified above, with the exception of the City of Chula Vista which did receive coverage of the Quino checkerspot butterfly. The City, CDFW, and Project applicant have had numerous meetings since the release of the 2018 draft SAP. CDFW has expressed concerns and provided edits regarding species conservation strategies, development design, Habitat Preserve design, trail alignments, and softline development allowances, particularly with respect to Quino checkerspot butterfly and Hermes copper butterfly. Numerous substantial edits continue to be made to the draft SAP.

**COMMENT #4: Wildlife Corridors and Habitat Linkages**

S1-20 **Issue:** Section 4.3.1.5 (Wildlife Corridors and Habitat Linkages) in the DEIR states that, "The entire project site currently functions as a habitat block with no distinct wildlife corridors or linkages." While technically true, CDFW finds this statement misleading because it does not foster further detailed analysis about surrounding topography, habitat types, and the manner in which wildlife species would be expected to move through the property following its development. This could then be further analyzed to identify additional natural features to incorporate, or perhaps to expand buffers from development, and thereby provide more effective connectivity between surrounding open space outside of the City's boundaries, and assist wildlife movement both east-west and north-south. Section 5.3.3 (Preserve System Habitat Connectivity and Connections) in the draft SAP presents a figure detailing the Project footprint and the larger Habitat Preserve system within the City saying that this figure "highlights the relationship of the Subarea Plan Preserve System and important connections with blocks of open space surrounding the Subarea Plan Area and key habitat linkages and wildlife corridors within the Subarea Plan Area." The open space in the proposed Project is critical in maintaining habitat connections with the open space on Marine Corps Air Station Miramar to the west, Goodan Ranch/Sycamore Canyon to the north, Lakeside Downs Habitat Conservation Area to the east, Mission Trails Regional Park to the west, and the San Diego River to the south.

**COMMENT #5: Incorrect Species Identification**

S1-21 **Issue:** The Biology Technical Report lists the Channel Islands slender salamander (*Batrachoseps pacificus*) as being observed on the Project site. This species is only found on Santa Cruz, San Miguel, Santa Rosa, and Anacapa Islands. The only species of slender salamander found in San Diego County is the garden slender salamander (*Batrachoseps major*).

**II. Mitigation Measure and Related Impact Shortcoming**

**COMMENT #6: Bird Nesting Avoidance Measures**

S1-22 **Issue:** In Section 4.3 (Biological Resources) in the DEIR, Mitigation Measure BIO-7 (Nesting Bird Survey) will avoid impacts to nesting birds by not allowing construction during the breeding season and by imposing buffer distances around nests found if construction needs to occur during the breeding season. BIO-7 states that, "The final appropriate buffer distance...shall be determined by a qualified biologist." CDFW is available to work with the qualified biologist in this regard. Alternatively, draft guidelines for buffer distances are provided below.

S1-23 **Specific impacts:** Construction during the breeding season of nesting birds could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in habitat adjacent to the Project boundary. The Project could also lead to the loss of foraging habitat for sensitive bird species. Furthermore, nests of all native bird species are protected under state laws and regulations, including Fish and Game Code sections 3503 and 3503.5.

S1-24 **Mitigation Measure #1:** To protect nesting birds that may occur on site or adjacent to the Project boundary, CDFW recommends that no construction should occur from February 15 through August 31 (January 1 for raptors).

S1-25 **Mitigation Measure #2:** If Project activities cannot be avoided from February 15 through August 31 (January 1 for raptors), a qualified biologist should complete a survey for nesting bird activity within a 500-foot radius of the construction site. The nesting bird surveys should be conducted at appropriate nesting times and concentrate on potential roosting or perch sites. CDFW recommends that the Lead Agency require surveys be conducted by a qualified biologist no more

**S1-19:** The comment includes text from the EIR stating that the EIR is consistent with the Draft Santee MSCP Subarea Plan and that it provides a greater level of conservation than required for the Santee MSCP Subarea Plan pursuant to the MSCP Plan. The comment states that there is a shortcoming to this statement since the City proposes coverage for three species (Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot), which are not covered under the MSCP Plan, and therefore, it is inappropriate to conclude that a "hardlined" project has sufficiently met all requirements of the MSCP Plan.

The comment correctly states that the three species mentioned (Quino checkerspot butterfly, Hermes copper butterfly, and western spadefoot) are not covered under the MSCP Plan. However, based on the expert opinion of the biologists who prepared the Biological Resources Technical Report (Appendix D), the City disagrees that this is a shortcoming because the EIR provides project-specific mitigation to reduce all impacts to these species to less than significant in accordance with CEQA requirements and the EIR is consistent with the Draft Santee MSCP Subarea Plan. Please refer to response to comment S1-18, which addresses the same issue regarding take authorization, which is not a CEQA issue, raised in this comment.



The comment also states that the CDFW has met on numerous occasions to discuss the Draft Santee MSCP Subarea Plan with the City and applicant and expressed concerns regarding species conservation, development and Habitat Preserve design, trail alignments, and soft line development allowances particularly with respect to Quino checkerspot butterfly and Hermes copper butterfly.

The CDFW comments regarding the Draft Santee MSCP Subarea Plan meetings are noted, but they do not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- S1-20:** The comment agrees with Section 4.3.1.5, Wildlife Corridors and Habitat Linkages, which states that the entire project site is a habitat block with no distinct wildlife corridors, but states that the EIR does not foster further detailed analysis about surrounding topography, habitat types, and the manner in which wildlife species would be expected to move through the property following its development. Based on the expert opinion of the biologists that prepared the Biological Resources Technical Report (Appendix D), the City disagrees that the EIR does not provide detailed analysis about surrounding topography, habitat types, and the manner wildlife species would be expected to move through the project site following its development. Section 4.3.5.4,

Native or Resident or Migratory Fish or Wildlife Species, provides substantial analysis on these topics. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

- S1-21:** This comment states that the Biological Resources Technical Report, Appendix D to the EIR, incorrectly lists the Channel Islands slender salamander (*Batrachoseps pacificus*) as being observed on the project site. The City agrees with this error. The transcription of notes was in error. Appendix K, Wildlife Compendium, of the Biological Resources Technical Report (Appendix D) has been revised to state the following:

~~*Batrachoseps major*—garden slender salamander  
*Batrachoseps pacificus*—Channel Islands slender  
salamander~~

- S1-22:** This comment provides a summary of the nesting bird mitigation measure (Mitigation Measure BIO-14) and states that the CDFW is available to work with the qualified biologist with regard to setting appropriate buffer distances. The City appreciates the CDFW’s offer to work with the project biologist to set appropriate buffers and notes that this would further ensure the effectiveness of this mitigation measure. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- S1-23:** This comment provides a summary of the specific impact to nesting bird species from construction during the breeding season. Impacts to nesting birds are addressed in the EIR, Section 4.3.5.1. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- S1-24:** This comment states that the CDFW recommends that no construction should occur from February 15 through August 31 (January 1 for raptors). This comment is a recommendation and not a requirement or prohibition of construction during the nesting season. The current Mitigation Measure BIO-14 for nesting birds includes this statement with slightly different dates. However, the City agrees with the comment's recommendation and has revised Mitigation Measure BIO-14 (Biological Resources Technical Report [Appendix D] Mitigation Measure BIO-7) to the following:

**BIO-14: Nesting Bird Survey.** To avoid impacts to nesting migratory birds, nesting raptors, and other nesting birds, which are sensitive biological resources pursuant to the California Environmental Quality Act, the Migratory Bird Treaty Act, and California Fish and Game Code, breeding season avoidance shall be implemented and included on all construction plans.

~~To the extent feasible, Except as specified below,~~ there shall be no brushing, clearing, and/or grading allowed during the breeding season of migratory birds ~~or raptors~~ (between ~~January~~ February 15 and ~~September 15~~ August 31) or raptors (January 1 and August 31) or coastal California gnatcatcher (between February 15 and August 15). If vegetation is to be cleared during the nesting season, all suitable habitat within 500 feet of the impact area shall be thoroughly surveyed for the presence of nesting birds by a qualified biologist no earlier than 72 hours prior to clearing. If project activities are delayed or suspended for more than 14 days during the nesting bird season, surveys should be repeated. The survey results shall be submitted by the project applicant to the City of Santee Director of Development Services. If any active nests are detected, the area shall be flagged and mapped on the construction plans along with an initial 100-foot buffer for non-listed passerines, 300-foot buffer for listed passerines (e.g., coastal California gnatcatcher), and up to a 500-foot maximum buffer for raptors. The nests shall be avoided and buffers maintained until the nesting cycle is complete or it is determined that the nest has failed. The final appropriate buffer distance, as well as cycle completion or nest failure, shall be determined by a qualified biologist. Factors used to determine and

guide the appropriate buffer distance shall include individual pair behavior responses, amount of buffering topography, proximity to existing disturbance, and ambient noise levels. In addition, a qualified biologist shall be present on the project area to monitor (see MM-BIO-8, approved biologist) the vegetation removal to ensure that nests not detected during the initial survey are not disturbed. If the monitoring biologist determines that the nesting activities are being substantially disrupted by adjacent construction activity, the City of Santee shall be notified and measures to avoid or minimize such impacts shall be developed. Such measures might include installation of noise barriers, increased buffering, stopping construction in that area, or other measures as developed.

- S1-25:** This comment states that the CDFW recommends that the lead agency require preconstruction surveys, with specified details for proximity and timing, be conducted if project activities cannot be avoided from February 15 through August 31 (January 1 for raptors). Mitigation for nesting birds already includes some of these requirements. The comment also recommended no-disturbance buffer distances, which the City agrees to implement and has revised Mitigation Measure BIO-14 as included in response to comment S1-24.

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S1-25 cont. than three days prior to the beginning of any Project-related activity likely to impact raptors and migratory songbirds for the entire Project site. If Project activities are delayed or suspended for more than 14 days during the breeding season, surveys should be repeated. If nesting raptors and migratory songbirds are identified, CDFW recommends the following minimum no-disturbance buffers be implemented: 100 feet around non-listed active passerine (perching birds and songbirds) nests, 300 feet around any listed passerine nests (e.g., California gnatcatcher (*Poiloptila californica*)), and 500 feet around active non-listed raptor nests. These buffers should be maintained until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

**COMMENT #7: Western Spadefoot Relocation**

S1-26 **Issue:** Mitigation Measure BIO-13 (Western Spadefoot Relocation) in the DEIR says that prior to clearing or grading during the wet season, spadefoot will be collected from areas within 300 meters of known occupied pools and will either be relocated immediately or held by a Wildlife Agency-approved biologist until construction activities are finished.

S1-27 **Specific impact:** Removing these amphibians from the habitat exposes them to foreign pathogens, alters their diet, and reduces mating opportunities, thus potentially contributing to decreased health and increased mortality.

S1-28 **Mitigation Measure #3:** To minimize significant impacts, western spadefoot that are collected from areas within 300 meters of known occupied pools will be relocated immediately and not removed from the Project site.

S1-29 **Mitigation Measure #4:** The Project should require a western spadefoot plan be developed in advance that fully takes into account locations of known breeding sites that are to be conserved, and any new potential breeding locations that may be provided as part of Project approval, as well as consider buffer distances to future development including roads. This plan is intended to ensure that a viable population of spadefoot will be retained on site following construction and full development of the Project. The plan will allow decisions to be made for any spadefoot individuals which may be encountered during project construction. This plan should be reviewed by the U.S. Geological Survey (USGS) who have provided Independent Science Review for spadefoot for the draft SAP (Rochester et al/2017).

**COMMENT #8: Trail Maintenance**

S1-30 **Issue:** In Section 6.1 (Maintenance and Management of Trails in the Fanita Ranch Public Access Plan, included within the BTR), trail maintenance recommendations are listed that would be implemented in the Habitat Preserve. One of these recommendations mentions a 3-foot clearance zone. There is no further discussion as to what this means.

S1-31 **Specific impact:** Vegetation clearing outside of the trail perimeter will encourage users to widen the existing trail alignment and destroy habitat.

S1-32 **Mitigation Measure #3:** To minimize significant impacts, there will be no 3-foot wide clearance zone around trail perimeters.

**ENVIRONMENTAL DATA**

S1-33 CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB\\_FieldSurveyForm.pdf](http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp).

**FILING FEES**

S1-34 The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required

**S1-26:** This comment summarizes Mitigation Measure BIO-13 (Western Spadefoot Relocation) in Section 4.3.5.1. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**S1-27:** This comment states specific adverse impacts to western spadefoot as a result of removing this species from their habitat as part of relocation mitigation. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**S1-28:** This comment states that western spadefoots that are collected from areas within 300 meters of known occupied pools would be relocated immediately and not removed from the project site. The City agrees with this recommendation, and Mitigation Measure BIO-13 (Biological Resources Technical Report [Appendix D] Mitigation Measure BIO-8) has been revised to the following:

**BIO-13: Western Spadefoot Relocation.** During the wet season prior to clearing or grading operations, biologists shall collect western spadefoot adults from areas within 300 meters of known occupied pools. Adults shall ~~either be held by a Wildlife Agency~~

~~approved biologist to be released back into the site after construction activities using standard methods, or they shall~~ be relocated to another area on the Fanita Ranch Project area that has suitable breeding habitat and few or no western spadefoot individuals.

~~A Western Spadefoot Relocation Plan is~~ Details on the western spadefoot relocation effort are included as a component of the Vernal Pool Mitigation Plan (included in the Biological Technical Report for the Fanita Ranch Project as Appendix R), available to the U.S. Geological Survey (USGS) for review, and is subject to approval by the wildlife agencies (U.S. Fish and Wildlife Service and CDFW). The Western Spadefoot Relocation Plan includes, at a minimum, the following elements:

- The timing and methods for surveying, capturing, and releasing adults. Long-term care methods shall also be discussed if this option is used.
- Collection shall occur during the first three or four large rain events of the season. Ideally, these rain events shall produce a minimum of 0.20 inch during a 24-hour period.

Implementation of this recommendation to revise Mitigation Measure BIO-13 does not change any conclusions provided in the EIR.

**S1-29:** This comment states that a western spadefoot plan be developed in advance that takes into account locations of known breeding sites that are to be conserved and any new potential breeding locations that may be provided, as well as consider buffer distances to future development, with the intention of ensuring a viable population after development of the project. The comment also requests that the USGS provide review.

Details of the western spadefoot relocation effort are already included as a component in the Appendix R, Vernal Pool Mitigation Plan, to the Biological Resources Technical Report (Appendix D), of the EIR. Information regarding known western spadefoot locations in the Habitat Preserve and potential new locations are also included in the Vernal Pool Mitigation Plan (Appendix R to the Biological Resources Technical Report [Appendix D]). It should be noted that there would be no future development in the Habitat Preserve because is implied by the comment. The Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) would ensure a viable population of western spadefoots persist within the Habitat Preserve. Please refer to Thematic Response – Western Spadefoot.

The City agrees with the recommendation to have the USGS review the western spadefoot relocation efforts, and Mitigation Measure BIO-13 (Biological Resources



Technical Report [Appendix D] Mitigation Measure BIO-8) has been revised and included in response to comment S1-28.

- S1-30:** This comment states that Section 6.1, Maintenance and Management of Trails in the Fanita Ranch Public Access Plan, recommends a 3-foot clearance zone. However, there is no further discussion as to what this means. The 3-foot clearance zone is defined in Section 6.1, Trail Types, of Appendix T, Fanita Ranch Public Access Plan, of the Biological Resources Technical Report (Appendix D) and refers to 3 feet of horizontal clearance buffer horizontally on the outside of trails between a height of 2 feet and 8 feet as a measure to provide safety and security for trail users. Its purpose was to allow clear visibility up and down trails. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, this clearance zone recommendation has been removed from the Public Access Plan; please see response S1-31.
- S1-31:** This comment states that vegetation clearing outside of the trail perimeter would encourage users to widen the existing trail alignment and destroy habitat. The City agrees with the comment, and the recommendation to maintain a 3-foot clearance zone outside of the trails has been removed from the Public Access Plan. The

implementation of this recommendation does not change any conclusions provided in the EIR.

- S1-32:** This comment states that, to minimize significant impacts, there should be no 3-foot-wide clearance zone around trail perimeters. It is not necessary to include this as a mitigation measure, which the comment suggests. Rather, the recommended clearance zone has been removed from the Public Access Plan. See response to comment S1-31.
- S1-33:** This comment states that CEQA requires that environmental data be incorporated into the California Natural Diversity Database. The biological consultants who have gathered environmental data for special-status species and natural communities occurring on the project site shall coordinate with the CDFW regarding an efficient way to have the data incorporated into the California Natural Diversity Database. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- S1-34:** This comment reiterates that the proposed project would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

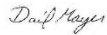
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S1-34 cont. | In order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs. tit. 14, § 753.5, Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

**CONCLUSION**

S1-35 | CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources.  
Questions regarding this letter or further coordination should be directed to Melissa Stepek, Senior Environmental Scientist at (650) 637-5510 or [Melissa.Stepek@wildlife.ca.gov](mailto:Melissa.Stepek@wildlife.ca.gov).

Sincerely,



David A. Mayer  
Environmental Program Manager

cc: Office of Planning and Research, State Clearinghouse, Sacramento  
Susan Wynn, U.S. Fish and Wildlife Service, Carlsbad

**REFERENCES**

Oberbauer, Thomas, Meghan Kelly, and Jeremy Buegge. March 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California", Robert F. Holland, Ph.D., October 1986.

Rochester, C. J., K. L. Baumberger, and R. N. Fisher. 2017. Draft Final Western Spadefoot (*Spea hammondi*): Independent Scientific Advisor Report for the City of Santee Multiple Species Conservation Plan (MSCP) Subarea Plan. 53 pp.

USFWS. 2009. Quino Checkerspot Butterfly (*Euphydryas editha quino*) 5-Year Review: Summary and Evaluation. Prepared for the U.S. Fish and Wildlife Service. August.

**S1-35:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**References**

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## Comment Letter S2: California Department of Transportation, July 13, 2020

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gravin Newsom

**S2**

**DEPARTMENT OF TRANSPORTATION**  
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Making Conservation  
 a California Way of Life.

July 13, 2020

11-SD-52  
 PM 13.25  
 Fanita Ranch Revised Draft EIR  
 SCH# 2005061118

Mr. Chris Jacobs  
 Principal Planner  
 City of Santee  
 Department of Development Services  
 10601 Magnolia Avenue  
 Santee, CA 92071-1266

Dear Mr. Jacobs:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review of the Fanita Ranch Revised Draft Environmental Impact Report (EIR) (SCH# 2005061118) near State Route 52 (SR-52) in Santee. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

**Environmental**

Caltrans welcomes the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA), as we have some discretionary authority of a portion of the project that is in Caltrans' Right-of-Way (R/W) through the form of an encroachment permit process. Please indicate our status as a Responsible Agency for the Final EIR. We look forward to our continued coordination efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate

**S2-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S2-2:** This comment provides an introduction to the comment letter identifying the California Department of Transportation (Caltrans) as a responsible agency under CEQA. In response to this comment, Section 3.12, Discretionary Actions, in the EIR has been updated to identify Caltrans as a responsible agency. In addition, the City of San Diego and County of San Diego were also identified as responsible agencies for the same reason.

S2-1

S2-2

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S2-2 cont. | meeting with you to discuss the elements of the EIR that Caltrans will use for our subsequent environmental compliance.

S2-3 | Thank you for the opportunity to comment on Revised Draft EIR for this project. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determinations or exemptions. The supporting documents must address all environmental impacts within the Caltrans' right-of-way, and address any impacts from avoidance and/or mitigation measures.

S2-4 | Caltrans recommends that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans R/W that includes impacts to the natural environment, infrastructure (highways/roadways/on- and off-ramps) and appurtenant features (lighting/signs/guardrail/slopes). Caltrans is interested in reviewing the technical studies and they impact our R/W for the biological assessment, cultural and tribal assessments, and any additional mitigation measures identified for the Final EIR.

**Traffic Engineering Analysis**

- S2-5 | 1. The pass-by and diverted trips of 40% for the K-8 school does not match what is shown in the "SANDAG not so Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region." Please revise or justify.
- S2-6 | 2. The AM SR-52 westbound (WB) off-ramp to Mast Boulevard volumes are only about 14% of what the most recent Caltrans volumes indicate. Either increase these volumes or justify.
- S2-7 | 3. The AM SR-52 eastbound (EB) on-ramp volumes from Mast Boulevard are only about 55% of what the most recent Caltrans volumes indicate. Either increase these volumes or justify.
- S2-8 | 4. The PM SR-52 WB on-ramp from Mission Gorge Road volumes are only about 64% of what the most recent Caltrans volumes indicate. Either increase these volumes or justify.
- S2-9 | 5. The PM SR-52 EB off-ramp to Mission Gorge Road volumes are only about 54% of what the most recent Caltrans volumes indicate. Either increase these volumes or justify.

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**S2-3:** This comment states that the Final EIR must be provided to Caltrans to address any impacts from avoidance and/or mitigation measures. The City will provide responses to Caltrans comments 10 days prior to the City Council hearing. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**S2-4:** This comment states that Caltrans recommends that the proposed project identify potential impacts and mitigation efforts that would occur within Caltrans rights-of-way. Caltrans is interested in reviewing the technical studies for biological resources, cultural and tribal cultural resources, and any additional mitigation measures identified for the Final EIR. The EIR evaluates Caltrans facilities, identifying impacts and recommending improvements to reduce impacts to below significant levels, where feasible, in compliance with CEQA requirements. The technical studies referenced in the comment were available for review during the 45-day EIR public review period and will be included in the Final EIR. No further response is required.

**S2-5:** This comment states that the 40 percent pass-by/diverted trip factor applied to the K-8 school trips does not match the San Diego Association of Governments (SANDAG) trip rates. SANDAG does not provide a trip rate specifically associated with a "K-8" school (combined elementary and

middle school aged students) and instead provides categories for “elementary” and “middle/junior high” categories. The primary trip percentage for the “elementary” land use is 57 percent and for “middle/junior high” is 63 percent based on the SANDAG trip rate. Thus, the average of these rates representing a K–8 school calculates to 60 percent of K–8 trips being primary trips, and the remaining 40 percent are attributed to pass-by/diverted trips. As such, Section 4.16.5.1, Threshold 1: Circulation System Performance, in Section 4.16, Transportation, explains that the school pass-by/diverted trips were appropriately based on the SANDAG rates. Therefore, this issue is adequately addressed in the EIR.

**S2-6:** This comment states that the Mast Boulevard/SR-52 Westbound Off-ramp volumes in the AM peak hour used in the EIR amount to 14 percent of the most recent Caltrans volumes. Traffic count data was collected on a typical weekday, Wednesday, February 7, 2018, by Bearcat Enterprises, LLC, DBA Count Data, a firm specializing in conducting traffic volume counts. Count Data has conducted traffic counts at thousands of intersections in Southern California. The counts were conducted using video camera detection to count individual vehicles during the 2-hour 7:00–9:00 a.m. peak period. The observed 1-hour peak hour for the entire intersection was observed during 8:00–9:00 a.m. when the off-ramp volume showed 24 peak hour trips. Therefore, the traffic volumes used in

the EIR analysis are adequate, and no revisions to the EIR are required.

- S2-7:** This comment states that the Mast Boulevard/SR-52 Eastbound On-Ramp volumes in the AM peak hour used in the EIR amount to 55 percent of the most recent Caltrans volumes. Traffic count data was collected on a typical weekday, Wednesday, February 7, 2018, by Bearcat Enterprises, LLC, DBA Count Data, a firm specializing in conducting traffic volume counts. Count Data has conducted traffic counts at thousands of intersections in Southern California. The counts were conducted using video camera detection to count individual vehicles during the 2-hour 7:00–9:00 a.m. peak period. The observed 1-hour peak hour for the entire intersection was observed during 8:00–9:00 a.m. when the on-ramp volume showed 88 peak hour trips. Therefore, the traffic volumes used in the EIR analysis are adequate, and no revisions to the EIR are required.
- S2-8:** This comment states that the Mission Gorge Road/SR-52 Westbound On-Ramp volumes in the PM peak hour used in the EIR amount to 64 percent of the most recent Caltrans volumes. Traffic count data was collected on a typical weekday, Thursday February 8, 2018 by Bearcat Enterprises, LLC, DBA Count Data, a firm specializing in conducting traffic volume counts. Count Data has conducted traffic counts at thousands of intersections in Southern California. The counts were conducted using



video camera detection to count individual vehicles during the 2-hour 4:00–6:00 p.m. peak period. The observed 1-hour peak hour for the entire intersection was observed during 5:00–6:00 p.m. when the on-ramp volume showed 173 peak hour trips. It should also be noted that this intersection is calculated to operate at level of service (LOS) A under existing PM peak hour conditions. Therefore, the traffic volumes used in the EIR analysis are adequate, and no revisions to the EIR are required.

- S2-9:** This comment states that the Mission Gorge Road/SR-52 Eastbound Off-Ramp volumes in the PM peak hour used in the EIR amount to 54 percent of the most recent Caltrans volumes. Traffic count data was collected on a typical weekday, Thursday February 8, 2018, by Bearcat Enterprises, LLC, DBA Count Data, a firm specializing in conducting traffic volume counts. Count data has conducted traffic counts at thousands of intersections in Southern California. The counts were conducted using video camera detection to count individual vehicles during the 2-hour 4:00–6:00 p.m. peak period. The observed 1-hour peak hour for the entire intersection was observed during 5:00–6:00 p.m. when the on-ramp volume showed 322 peak hour trips. It should also be noted that this intersection is calculated to operate at LOS B under existing PM peak hour conditions. Therefore, the traffic volumes used in the EIR analysis are adequate, and no revisions to the EIR are required.

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- S2-10 6. Intersection #56 for existing conditions does not show any movements for the southbound Cuyamaca Street to WB SR-52 on-ramp. Please revise or explain.
- S2-11 7. The AM SR-52 EB on-ramp volumes from Cuyamaca Street are only about 65% of what the most recent Caltrans volumes indicate. Either increase these volumes or justify.
- 8. The SR-52 EB off-ramp to Mast Boulevard Synchro 95% queuing results are shown in the table below.

	Left Turn	Left/Thru/Right
Existing Storage	1515	350
Existing + Project PM	933	953
Existing + Project without school PM	944	965
Existing PM	592	607

- S2-12 Per the table above, the addition of the Fanita Ranch project creates a direct safety issue impact by causing the queue of vehicles on the EB off-ramp to exceed the storage capacity. This causes a speed differential concern with stopped cars on the exit ramp adjacent to live traffic on the SR-52 main lanes. This situation needs to be mitigated accordingly by the Fanita Ranch project.
- S2-13 9. When viewing the SimTraffic simulation at the SR-67 southbound (SB) off-ramp to Riverford Road existing + project AM condition, there is a queue that exceeds the storage capacity. This causes a speed differential concern with stopped cars on the exit ramp adjacent to live traffic on the SR-67 main lanes. This situation needs to be mitigated accordingly by the Fanita Ranch project.
- S2-14 10. The Synchro signal timings do not match Caltrans signal timings and need to be revised at the following locations:
  - SR-52 EB off-ramp to Mast Boulevard (Max splits)
  - SR-52 WB off-ramp to Mast Boulevard (Max splits)
  - SR-52 EB off-ramp to Mission Gorge Road
  - SR-125 NB off-ramp to Mission Gorge Road
  - SR-52 EB off-ramp to Cuyamaca Street (Max splits)
  - SR-52 WB off-ramp to Cuyamaca Street (Max splits)

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**S2-10:** This comment states that the existing conditions does not show any movements for the southbound movement from Cuyamaca Street to the SR-52 Westbound On-Ramp. The southbound right-turning movement onto SR-52 Westbound is an uncontrolled free right turn movement that occurs after the southbound through vehicles travel through the signalized intersection. Therefore, the southbound right-turns were included in the southbound through volumes for the signalized intersection analysis. As shown in Appendix N, Transportation Impact Study, Figure 3-1, Existing Traffic Volumes, the southbound through volume used in the analysis in the AM and PM peak hours is 1,256/1,639, respectively. Of the 1,256 AM trips, Appendix N, Intersection and Segment Manual Count Sheets, Caltrans Freeway Volumes, of the EIR Appendix N, shows the southbound right as 287 trips and southbound through as 969 trips. Of the 1,639 PM trips, the southbound right is 529 trips and the southbound through is 1,110 trips. Therefore, the traffic volumes used in the EIR analysis are adequate, and no revisions to the EIR are required.

**S2-11:** This comment states that the Cuyamaca Street/SR-52 Eastbound On-Ramp volumes in the AM peak hour used in the EIR amount to 65 percent of the most recent Caltrans volumes. Traffic count data was collected on a typical weekday, Tuesday February 6, 2018, by Bearcat

Enterprises, LLC, DBA Count Data, a firm specializing in conducting traffic volume counts. Count Data has conducted traffic counts at thousands of intersections in Southern California. The counts were conducted using video camera detection to count individual vehicles during the 2-hour 7:00–9:00 a.m. peak period. The observed 1-hour peak hour for the entire intersection was observed during 7:15–8:15 a.m. when the off-ramp volume showed 364 peak hour trips. Therefore, the traffic volumes used in the EIR analysis are adequate, and no revisions to the EIR are required.

- S2-12:** This comment discusses the 95th percentile queuing results from the Synchro analysis software for the Mast Boulevard/SR-52 Eastbound Off-Ramp. The comment states that the off-ramp storage would be exceeded resulting in a safety issue impact on the mainline requiring mitigation. This intersection lies within both Caltrans' and the City of San Diego's jurisdiction. Caltrans does not have published significance criteria for measuring impacts based on 95th percentile queue results. The City of San Diego significance criteria also does not utilize queue lengths as an efficiency metric; rather level of service (LOS)/delay is utilized. Therefore, there is no nexus, per CEQA, for the proposed project to analyze queuing operations of the off-ramp. However, HomeFed Fanita Rancho, LLC, the project applicant, has privately funded a Caltrans Project Study Report –

Project Development Support (PSR-PDS), dated January 2020, for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. The PSR-PDS is included as an attachment to the Transportation Impact Analysis (Appendix N).

**S2-13:** Per the comment, Caltrans used SimTraffic in a supplemental analysis apart from the required CEQA analysis. This comment discusses the SimTraffic simulation software showing off-ramp queueing issues at the SR-67 Southbound Ramp at Riverford Road which could affect mainline traffic, thus resulting in a potential impact requiring mitigation. This intersection lies within both Caltrans' and the County of San Diego's jurisdictions. Caltrans does not have published significance criteria for measuring impacts based on 95th percentile queue results. The County of San Diego significance criteria used in this analysis to evaluate the LOS impacts to this intersection also do not use queues lengths as an efficiency metric. Therefore, there is no nexus, per CEQA, for the proposed project to analyze the queuing operations of the off-ramp. However, a significant impact was identified in the EIR using County criteria for delay operations and a mitigation measure to install a traffic signal at the SR-67 Southbound Ramps/Riverford Road intersection is recommended to improve the flow of vehicles exiting

SR-67 from the off-ramp. Since this intersection is located within the County of San Diego's and Caltrans' jurisdictions, the City of Santee (City) is without jurisdiction to ensure the construction of the recommended improvements. Therefore, for the purposes of CEQA, the impact is considered significant and unavoidable. A request to meet with Caltrans staff (email to Maurice Eaton) was made on July 24, 2020.

**S2-14:** The signal timings plans were requested and received from Caltrans for use in the intersection analysis. The most recent timing plans at the time of the request were provided by Caltrans and appropriately coded into the Synchro analysis software. The comment notes that the “max splits” in certain intersection timings do not match Caltrans timing plans. When inputting established timing plans into the Synchro software, timings are then adjusted automatically by the software to account for several cycle factors. For example, in the Mast Boulevard/Westbound Ramps signal timing, the Caltrans plans show a “flashing don't walk” time of 30 seconds for the northbound phase but a “max split” of 20 seconds for the same phase. The limitations of the Synchro software assume pedestrian walk times for all cycles during the peak hour analyzed and cannot differentiate between cycles when the pedestrian phases are not active. Thus, the software cannot allow a max split of 20 seconds when the pedestrian “flashing don't

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- S2-14 cont.
  - SR-67 NB off-ramp to Prospect Avenue
  - SR-67 NB/EB off-ramp to Woodside Avenue near Riverford Road.
- S2-15
 

11. The Vehicle Miles Traveled (VMT) section states: "Mitigation measures for VMT impacts are proposed through implementation of a Transportation Demand Management (TDM) Plan. It is therefore concluded that with the TDM Plan implemented for the Fanita Ranch Project, VMT impacts would remain significant and unmitigated." Caltrans does not agree that VMT impacts would remain significant and unmitigated. The applicant is responsible for addressing and mitigating impacts under CEQA law. Mitigation measures need to be implemented until the VMT impacts are fully mitigated.
- S2-16
 

12. The transportation impact analysis references a Caltrans PSR-PDS intended to relieve congestion to the SR-52 corridor. Provide additional details on how the Fanita Ranch project will contribute funding to these improvements.
- S2-17
 

13. For all the mitigation measures on Caltrans facilities the Transportation Impact Analysis reiterates the same statement: "The City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact is considered significant and unavoidable." This statement regarding mitigation is unacceptable for mitigation measures TRA-9, TRA-13, TRA-29, and TRA-30. Instead, the statement needs to be revised to show that the Fanita Ranch project applicant will coordinate with Caltrans to obtain required approvals and encroachment permits needed to implement these mitigation measures.
- S2-18
 

14. The Fanita Ranch project needs to coordinate with Caltrans, and other applicable agencies regarding the identified direct significant impacts at the locations below. These direct significant impacts need to be mitigated either by the mitigation measures identified in the Transportation Impact Analysis or another method acceptable to Caltrans, and other applicable agencies.

  - Intersection #17, Mast Blvd / SR-52 WB Ramps
  - Intersection #37, Riverford Rd / SR-67 SB Ramps
  - Freeway mainline segment SR-52: Santo Road to Mast Boulevard (EB)
  - Freeway mainline segment SR-52: Santo Road to Mast Boulevard (WB)
- S2-19
 

15. The Fanita Ranch project needs to coordinate with Caltrans, and other applicable agencies to provide fair share contributions to the locations listed below that have cumulative impacts and identified mitigation measures. If a fair share contribution is not possible, then alternative and

walk” time is greater than that amount at 30 seconds. In the field, the signal is actuated and responsive to whether or not a pedestrian phase is activated. The software, however, assumes a pedestrian phase for all cycles during the peak hour, which actually results in greater vehicle delay than may occur in the field since a pedestrian phase would be unlikely to occur in all phases during a cycle. Given the explanation above, the appropriate signal timings were inputted into the Synchro software for all Caltrans intersections and the analysis in the EIR is adequate.

**S2-15:** The comment states that they disagree that the impacts to VMT would remain significant and unmitigated and that the proposed project is responsible to fully mitigate impacts per CEQA law. This is a misstatement of CEQA, which requires mitigation of potentially significant impacts to the extent feasible. The most commonly applied tool to quantitatively reduce VMT is the California Air Pollution Control Officers Association (CAPCOA) Quantifying Greenhouse Gas Mitigation Measures, August 2010 handbook (page 58, Chart 6-2, Transportation Strategies Organization). The proposed project is located in a “suburban context” per CAPCOA. As such, the maximum VMT reduction from application of any and all appropriate VMT reduction measures is 15 percent. The proposed project exceeds the Santee Citywide average VMT per capita threshold by, at most, 32 percent (under the land use plan without school). Therefore, it is infeasible for the proposed project to achieve

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a 32 percent VMT reduction utilizing the VMT reduction measures from the published CAPCOA document. The proposed project can achieve a 13.7 percent reduction in VMT as shown in the EIR by applying several feasible VMT reduction measures, coming close to the maximum allowable 15 percent threshold. Given the explanation above, the appropriate VMT reduction measures were applied, and the analysis in the appropriate conclusion regarding the significance of impacts was reached.

- S2-16:** The comment asks that the EIR provide further details on how the proposed project will contribute to funding the SR-52 PSR-PDS. Per the explanation in Section 4.16.5, Project Impacts and Mitigation Measure, it states that the applicant has privately funded the PSR-PDS with an attachment included in the appendix to the Appendix N. Per the PSR-PSR included in the appendix, the applicant has entered into an agreement with Caltrans to identify operational improvements to SR-52 that are intended to relieve congestion. This issue is adequately addressed in the EIR.
- S2-17:** The comment states that the “significant/unmitigated” conclusion for all Caltrans impacted facilities should instead require the applicant to coordinate with Caltrans on the implementation of mitigation measures. Such a finding is not authorized by CEQA (see CEQA Guidelines, Section 15091[a]). As discussed in the EIR, the applicant already has begun coordination with Caltrans for improvements to mitigate potential project impacts, executed agreements and

committed funds for such purposes. For impacts to SR-52 addressed by Mitigation Measures TRA-9, TRA-29, and TRA-30, the applicant has privately funded a Caltrans PSR-PDS for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. For Mitigation Measure TRA-13, the installation of a traffic signal is recommended to improve operations at the Riverford Road/SR-67 Southbound Ramps intersection. The improvements listed in Mitigation Measures TRA-9, TRA-29, and TRA-30 will be conditions of approval for the proposed project. Since Mitigation Measure TRA-13 is located within the County of San Diego's and Caltrans' jurisdictions, the City is without jurisdiction to ensure the construction of the recommended improvements. Therefore, pursuant to CEQA Guidelines, Section 15091(a)(2), the impact is accurately identified as being within the jurisdiction of Caltrans and consequently significant and unavoidable insofar as the City cannot implement the mitigation measures itself. A meeting was held August 6, 2020, for the purpose of discussing Caltrans traffic comments submitted for the project and coordinating the implementation of mitigation measures within Caltrans jurisdiction.

- S2-18:** The comment lists the impacts noted in response to comment S2-17, requesting the applicant coordinate with Caltrans on mitigation measures. Please refer to response to comment S2-17, which addresses the same issue raised in this comment.



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S2-19 cont. equivalent mitigation measures should be provided for review and approval by Caltrans, and other applicable agencies.

- Intersection #17, Mast Blvd / SR-52 WB Ramps
- Intersection #37, Riverford Rd / SR-67 SB Ramps
- Freeway mainline segment SR-52: Santo Road to Mast Boulevard (EB)
- Freeway mainline segment SR-52: Santo Road to Mast Boulevard (WB)

S2-20 **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation system. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Santee or other lead agency, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.

S2-21 **Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The City should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as

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**S2-19:** The comment lists the impacts noted in response to comment S2-17, requesting the applicant coordinate with Caltrans on mitigation measures. Please refer to response to comment S2-17, which addresses the same issue raised in this comment.

**S2-20:** This comment discusses the desire for the proposed project to coordinate with Caltrans and lead agencies regarding complete streets and mobility network improvements in the study area. As discussed in the EIR, the proposed project would design a system of complete streets that supports multiple user types, including 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. The City will continue to coordinate with Caltrans and other agencies on improvements in areas of joint jurisdiction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**S2-21:** This comment provides background information related to land use and smart growth. The City will continue to coordinate with Caltrans on improvements in areas of joint jurisdiction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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S2-21 cont.	development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.
	<b>Mitigation</b>
	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 California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.
S2-22	Caltrans recommends consideration of "fair share" funds towards future improvements associated with the SR-52 corridor. Since the Fanita Ranch Project's cumulative impact is considered significant, feasible mitigation measures to State facilities should be identified in the traffic impact study (TIS). Impacts that are significant and unmitigated/unavoidable need to have an alternative mitigation identified in the DEIR TIS. Recommended feasible mitigation measures include "fair share" contribution towards highway improvements. 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.
S2-23	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 ( <a href="http://www.dot.ca.gov/trafficops/ice.html">http://www.dot.ca.gov/trafficops/ice.html</a> ).
S2-24	Mitigation conditioned as part of a local agency's development approval for improvements to State facilities can be implemented either through a Cooperative Agreement between Caltrans and the lead agency, or by the project proponent entering into an agreement directly with Caltrans for the mitigation. When that occurs, Caltrans will negotiate and execute a Traffic Mitigation Agreement.

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- S2-22:** This comment refers to coordinating with Caltrans on mitigation measures to Caltrans facilities. Please refer to response to comment S2-17, which addresses the same issue raised in this comment.
  
- S2-23:** This comment refers to coordinating with Caltrans on mitigation measures to Caltrans facilities. Please refer to response to comment S2-17, which addresses the same issue raised in this comment.
  
- S2-24:** This comment refers to coordinating with Caltrans on mitigation measures to Caltrans facilities. Please refer to response to comment S2-17, which addresses the same issue raised in this comment.

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**Right-of-Way**

S2-25

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. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the CEQA determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies.

S2-26

If you have any questions, please contact Mark McCumsey, of the Caltrans Development Review Branch, at (619) 688-6802 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief  
Local Development and Intergovernmental Review Branch

**S2-25:** This comment refers to permitting for work completed within Caltrans rights-of-way. For any work performed within Caltrans rights-of-way, the applicant and/or City will obtain any and all necessary permits/approvals from Caltrans prior to the start of work. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**S2-26:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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### Comment Letter S3: California Highway Patrol, July 13, 2020

State of California-Transportation Agency

GAVIN NEWSOM, Governor

S3

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL

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(619) 401-2000  
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July 13, 2020

File No.: 680.15811.14517.Fanita Ranch EIR

City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

Attention: Mr. Chris Jacobs

Dear Mr. Jacobs:

S3-1

The California Highway Patrol (CHP) El Cajon Area recently received a Draft Revised Environmental Impact Report for the Fanita Ranch Project. The State Clearing House number is 2005081118. A review of the Revised Environmental Impact Report for the Fanita Ranch Project has raised several concerns. The proposed site development could include approximately 2,950 residential units, 80,000 square feet of commercial development, an additional K-8 grade school, approximately 78 acres of parks and recreational facilities, and other public facilities.

S3-2

The Fanita Ranch Project will likely result in an increase in several aspects of functions within the El Cajon Area and the CHP San Diego Area, specifically related to State Route 52, State Route 125, State Route 67, Interstate 8, and the unincorporated areas adjacent to the project. The project will increase the number of calls into the CHP Border Communication Center, increase the number of calls for service within the CHP El Cajon and San Diego Areas, increase the amount of traffic enforcement by the CHP El Cajon and San Diego Areas within this geographical area of San Diego County necessary to protect life and property. Additionally, it will increase traffic within the geographical area of responsibility of the CHP El Cajon and San Diego Areas which would increase response times of CHP officers responding to calls for service in other geographical areas of San Diego County, and increase the amount of emergency services the CHP El Cajon and San Diego Areas provide within this area of San Diego County.

S3-3

Thank you for allowing me the opportunity to comment on the Fanita Ranch Draft Revised EIR. Should you have any questions, please contact the El Cajon Area, Lieutenant Clyde Larkin, at (619) 401-2000.

Sincerely,

C. FOUYER, Captain  
Commander  
El Cajon Area

cc: Special Projects Section  
Border Division  
San Diego Area



Safety, Service, and Security

An Internationally Accredited Agency

**S3-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S3-2:** The comment asserts that the proposed project will result in an increase in several aspects of California Highway Patrol (CHP) El Cajon Area and CHP San Diego Area functions, specifically related to State Route (SR-) 52, SR-125, SR-67, Interstate (I-) 8, and the unincorporated areas adjacent to the proposed project. The comment claims the proposed project will increase the number of calls into the CHP Border Communication Center, calls for service, the amount of traffic with the resulting increase in response times to calls for service in other areas, and the amount of traffic enforcement and emergency services the CHP El Cajon and San Diego Areas provide.

Construction of the proposed project is anticipated to begin in 2021 with a buildout of approximately 10 to 15 years. Thus, based on a conservative estimate and averaged over 10 years, the 7,974-person population increase under the preferred land use plan with school would equate to approximately 797 new residents per year, which would be consistent with the City of

Santee's (City's) historical population increases (refer to Section 4.13.5.1, Threshold 1: Inducement of Substantial Population Growth, Table 4.13-4, City Population Increases, in the EIR). Additionally, the project site has been historically designated for residential development ranging from 1,395 to 14,000 residential units. Refer to Sections 4.13.5.1 and 4.13.6.1, Cumulative Threshold 1: Inducement of Substantial Population Growth. Thus, the increase in population as a result of the proposed project would be incremental over a 10- to 15-year period and has been accounted for in planning purposes for many years.

In terms of traffic resulting from the proposed project, the Transportation Impact Analysis (TIA) prepared by Linscott, Law & Greenspan, Engineers (2020), and provided as Appendix N in the EIR analyzed local roadway segments, intersections, and mainline freeway locations where the proposed project will add 50 or more peak-hour trips in either direction to the existing roadway traffic. Seven freeway mainline segments including four segments along SR-52, two segments along SR-67, and one segment along SR-125 were analyzed in the TIA. Thus, the EIR analyzed impacts to three of the freeways cited in the comment (Section 4.16.1.1, Existing Transportation Network). Because fewer than 50 trips would be added to I-8, the interstate would not be impacted and was not analyzed.

Table 4.16-13, Existing + Project Freeway Segment Operations, summarizes the freeway segment operations under the Existing + Project scenario; Table 4.16-16, Existing + Cumulative Projects Freeway Segment Operations, summarizes the Existing + Cumulative Projects + Project freeway mainline segment operations; and Table 4.16-19, Year 2035 + Project Freeway Segment Operations, summarizes the Year 2035 + Project freeway segment operations. Under each scenario, significant impacts would result along the Santo Road to Mast Boulevard segment of SR-52 in both the eastbound and westbound direction, and Mitigation Measures TRA-29 and TRA-30 were included to study all feasible improvements along SR-52. Impacts were less than significant for each of the other six mainline segments analyzed (Section 4.16.5.1, Threshold 1: Circulation System Performance).

The EIR recognizes that SR-52 is a major east–west freeway providing East County San Diego communities with access to and from the City of San Diego and locations north and south. Current levels of congestion in the AM and PM peak periods affect the reliability of service on this freeway and delay travel times. In accordance with Mitigation Measures TRA-29 and TRA-30, the applicant has privately funded a California Department of Transportation (Caltrans) Project Study Report – Project Development Support, dated January

2020, for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. The Project Study Report – Project Development Support project limits are along SR-52 from the Mission Gorge Road undercrossing to the I-15 connector and includes the SR-52/Mast Boulevard interchange. The two build alternatives generally include converting the existing westbound freeway shoulder into a truck-climbing lane/auxiliary lane and converting the existing concrete barrier-separated two-way bike path to the eastbound freeway shoulder. Both alternatives would increase capacity and improve freeway operations along SR-52. A Class IV Bikeway (Separated Bikeway) facility would be constructed on the eastbound side of the freeway to replace the existing two-way bike path. Over the existing Oak Canyon and Spring Canyon Bridges, the separated bikeway would be cantilevered from the bridge deck.

At the SR-52/Mast Boulevard interchange, ramp improvements and freeway restriping are proposed to improve freeway operations in the westbound and eastbound directions. Freeway restriping would include the eastbound San Diego River Bridge where the number of lanes would be increased from two to three lanes. The build alternatives also include the addition of an auxiliary lane along eastbound SR-52 between I-15 and Santo Road. The proposed auxiliary lane would begin at the connector from



southbound I-15 onto eastbound SR-52 and end at the off-ramp from eastbound SR-52 to Santo Road. An additional segment of new lane would also be constructed on westbound SR-52 between the off- and on-ramps of Santo Road to allow for through movements. Constructing this lane segment would require a retaining wall beneath the Santo Road overcrossing.

The second build alternative would include restriping the westbound San Diego River Bridge to three lanes. In this configuration, the lane-drop west of the SR-52/Mission Gorge Road interchange would be removed, and the three existing mainline lanes at the SR-52/Mission Gorge Road interchange would be extended to connect to the SR-52/Mast Boulevard interchange, where the proposed truck-climbing lane would begin.

The applicant is working in close coordination with the Caltrans District 11. It is anticipated that funding for the Project Approval/Environmental Document, final design, and construction phases would be a combination of developer contributions and grants from federal, state, or local agencies and programs. If the proposed project is included in a future Federal Transportation Improvement Program, a Supplemental Project Development Support or Project Report could serve as the programming document for the remaining support and capital components of the project. A Project Report would serve as approval of the “selected” alternative.

Local agency involvement includes the City, who sponsored the SR-52 Corridor Study in 2016 to explore potential solutions to address congestion issues on SR-52. The Technical Working Group for this study included the Cities of El Cajon, La Mesa, San Diego, and Santee. Regional agency involvement included Caltrans, San Diego Association of Governments, and San Diego Metropolitan Transit System (refer to the Mitigation Measures subsection in Section 4.16.5.1).

Because the City is without jurisdiction to implement the above-described improvements, the EIR concludes that certain impacts related to freeway segments would remain significant and unavoidable. However, the Development Agreement between the City and applicant would prohibit the issuance of any certificates of occupancy in the proposed project until the SR-52 corridor improvements have been installed by Caltrans (see Section 21.4 of TIA).

The comment does not provide specific information related to the increase in calls for service, response times, or whether additional personnel would be required. An increase in demand on public facilities and services that could result from a project are not environmental effects within the purview of CEQA (see, for example, *City of Hayward v. Board of Trustees of California State University* (2015) 242 Cal.App.4th 833,

840.) Even so, the increase in traffic as a result of the proposed project would only impact one segment of the freeways cited in the comment. The applicant, Caltrans, San Diego Association of Governments, San Diego Metropolitan Transit System, and the Cities of El Cajon, La Mesa, San Diego, and Santee are working to address conditions along SR-52, which would include the impacted Santo Road to Mast Boulevard segment. As traffic impacts along the majority of mainline segments are less than significant, calls for service and resultant response times for the El Cajon and San Diego Area CHP are also anticipated to be less than significant. The EIR adequately discloses impacts along the Santo Boulevard to Mast Road segment of SR-52, and the applicant is working with Caltrans to resolve congestion along SR-52. Further, the project site has been planned for residential development for over 40 years, and construction of the project would take place over a 10- to 15-year period, allowing the CHP to plan for future residential development and allocate proper personnel. No changes to the EIR are necessary.

- S3-3:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter S4: San Diego River Conservancy, July 13, 2020

**S4**

STATE OF CALIFORNIA-THE NATURAL RESOURCES AGENCY

GAVIN NEWSOM, Governor

SAN DIEGO RIVER CONSERVANCY

11769 WATERHILL RD  
LAKESIDE, CA 92040  
PHONE (619) 390-0571  
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July 13, 2020

Via email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

Chris Jacobs, Principal Planner  
Dept. Development Services  
City Hall, Bldg. 4  
10601 Magnolia Avenue  
Santee, CA 92071

Re: Draft Revised EIR Fanita Ranch Project (SCH#2005061118)

Dear Mr. Jacobs,

The San Diego River Conservancy (Conservancy) has reviewed the above- referenced Draft Revised Environmental Impact Report (Draft Revised EIR) for the Fanita Ranch project. The Conservancy is submitting the following comments on the Draft Revised EIR. The Conservancy appreciates the opportunity to comment on this matter.

The Conservancy, a State agency, was created "to acquire and manage public lands within the San Diego River area, and to provide recreational opportunities, open space, wildlife habitat, restoration and protection of species, wetland protection and restoration, protection of historical and cultural resources, and protection, maintenance, and improvements of the quality of the waters in the San Diego River and its watershed, its tributaries, and historic flumes emanating from the river for all beneficial uses, lands for educational uses within the area, and natural floodwater conveyance." (Pub. Resources Code, § 32633.)

**Proposed Project**

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. Development would be clustered preserving 1,650 acres as habitat preserve.

**Sycamore Creek**

The Draft Revised EIR references that Sycamore Creek and its riparian system is a tributary to the San Diego River. The Draft Revised EIR should discuss or analyze how this creek will be maintained or protected during and after construction. Studies need to be completed to establish baselines for a) parameters of the aquifer around Sycamore Creek and b) understanding how much input the aquifer must receive to maintain the aquifer for the benefit of native vegetation communities. The loss or disruption of this riparian system will affect wildlife corridors and movement, decrease water quality, and exacerbate the potential for downstream flooding and scour. Without a clear understanding of the hydrology that supports this creek and woodlands, many of the creek functions will be negatively impacted.

Page 1 of 6

**S4-1:** This comment provides an introduction to the comment letter and summary of the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**S4-2:** This comment states that the EIR should address maintained and protected creeks during and after construction of the proposed project. The construction operations for the proposed project would be to obtain a Storm Water Pollution Prevention Plan (SWPPP) as required by Construction General Permit Order 2009-0009-DWQ prepared by a Qualified SWPPP Developer (QSD) prior to the commencement of any construction activities. The SWPPP would require the proposed project to implement effluent standards, site management, non-stormwater management, erosion control, sediment control, runoff control, and inspections in compliance with a Rain Event Action Plan that will be prepared prior to the start of construction activities.

Post construction, the proposed project has prepared the Stormwater Quality Management Plan (SWQMP) for Vesting Tentative Map for Fanita Ranch Permit Application Numbers GPA2017-2/TM 2017-3 per the requirements of the San Diego Municipal Stormwater Permit Order No. R9-

2013-0001. As a Priority Development Project, the project is implementing Site Design, Source Control, Pollutant Control and Hydromodification Measures in accordance with the City of Santee BMP Design Manual dated February 2016 in compliance with the San Diego Municipal Storm Water Permit Order No. R9-2013-000 as mended per Order No. R9-2015-0001 and R9-2015-0100.

The SWQMP includes the design of a system of bioretention basins and modular wetlands in each watershed tributary to Sycamore Creek prior to discharge to any natural watercourse. The bioretention basins and modular wetlands would clean all discharges from the proposed project per the requirements of the San Diego Municipal Stormwater Permit Order No. R9-2013-0001 so as not to further degrade the beneficial uses in the Sycamore Creek Watershed. The bioretention basins also function to provide hydromodification, assuring the discharges for rainfall up to the 10-year frequency storm matches the discharges prior to the proposed project.

The Master Drainage Study (Appendix J1) was prepared to analyze peak pre-development and post-development runoff quantities. Detention basins were designed as required on each watershed to reduce post-development runoff from a 100-year frequency storm to pre-development levels. The proposed project would not adversely impact the low flow or peak discharges to the Sycamore Creek Watershed.

S4-3	<p><b>Flooding</b></p> <p>Sycamore Creek floodplain is prone to flooding during rain events. In 2010, a large rain event caused catastrophic downstream flooding to the residents of Pebble Beach Drive, Padre Dam Municipal Water District headquarters and the Carlton Oaks Drive bridge at Sycamore Creek. The water level in the creek reached the height of the bridge and caused water to overspill on the roadway.</p> <p>Due to lack of regular maintenance, Sycamore Creek and rain events in its current configuration has led to significant downstream flooding in the past 20 years. As a result, during rain events, run off by adjacent neighborhoods' drain into Sycamore Creek. Swift water drops sediment into the creek/conveyance which makes its way down the creek to the north side of the bridge at Carlton Oaks Drive. Due to the current drought and climate change, each year as normal rain events occur, sediment builds up on and near the north side of the bridge, immediately adjacent to Padre Dam Municipal Water District's maintenance yard. City of Santee then determines when to remove the trapped sediment, every few years or so. As the sediment piles up downstream, flowing water slows in Sycamore Creek and can cause flooding in the Santee Lakes, nearby businesses and on private property. The Conservancy suggests studying the flooding in more detail to determine a way to permanently decrease risk of flooding downstream, by mitigating inflow into creek during storm events.</p>
S4-4	<p><b>Detention Basin(s)</b></p> <p>Although the Draft Revised EIR details a significant number of detention basins, the analysis should discuss in greater detail, the type of potential pollutants, the amount of pollutants, and how natural filtration will reduce pollutants. Without an accurate analysis of the pollutants, which are anticipated to flow into Sycamore Creek system, there are many unknowns to adequately determine the viability of the creek's functions post-construction. The Draft Revised EIR needs to include a detailed study and comprehensive water quality plan as it specifically relates to Sycamore creek.</p>
S4-5	<p><b>Wildlife</b></p> <p>The proposed Fanita Ranch project would develop nearly half of the project site, and the proposed footprint would spread development across the project site landscape. The project 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 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 (<i>Euphydryas editha quino</i>), Hermes copper butterfly (<i>Lycaena hermes</i>), western spadefoot toad (<i>Spea hammondi</i>), coastal cactus wren (<i>Campylorhynchus brunneicapillus</i>), and the San Diego golden star (<i>Bloomeria clevelandii</i>).</p>
S4-6	<p>A total of 137 species of birds were observed on the project site or immediately off-site during the surveys conducted from 2003 to 2017. A total of 22 special-status birds were observed. Some of the species observed include rufous-crowned sparrow (<i>Aimophila ruficeps</i>), California quail (<i>Callipepla californica</i>), Anna's hummingbird (<i>Calypte anna</i>), red-tailed hawk (<i>Buteo jamaicensis</i>), and northern mockingbird (<i>Mimus polyglottos</i>). Cooper's hawk (<i>Accipiter cooperii</i>), osprey (<i>Pandion haliaetus</i>), Coastal California gnatcatcher, (<i>Polioptila californica</i>) rufous hummingbird (<i>Selasphorus rufus</i>), yellow warbler (<i>Setophaga petechia</i>), golden eagle (<i>Aquila chrysaetos</i>), Bell's sage sparrow</p>

**S4-3:** This comment states that Sycamore Creek is prone to flooding in rain events and that the flooding should be studied in detail to mitigate inflow during major storm events.

The Master Drainage Study (Appendix J1) was prepared to analyze peak pre-development and post-development runoff quantities. Detention basins were designed as required on each watershed to reduce post-development runoff from a 100-year frequency storm to pre-development levels. The Master Drainage Study shows that post-development runoff from the 100-year frequency storm to Sycamore Creek will be 583 cubic feet per second less than predevelopment peak runoff.

**S4-4:** This comment states that EIR should include a detailed study and comprehensive water quality plan as it relates to Sycamore Creek. The Storm Water Quality Management Plan (SWQMP) was prepared for Vesting Tentative Map for Fanita Ranch Permit Application Numbers GPA2017-2/TM 2017-3 per the requirements of the San Diego Municipal Storm Water Permit Order No. R9-2013-0001. The SWQMP provides water quality treatment for the development prior to discharge from the developed areas and prior to discharge to Sycamore Creek. The SWQMP analyzes all downstream water bodies as designated by the San Diego Regional Water

Quality Control Board, including Sycamore Creek and all water bodies included on the 303d list.

- S4-5:** This comment provides an overview of the development area of the proposed project and states that the proposed project would fragment natural open space in a manner that would reduce the following sensitive species numbers and viabilities: Quino checkerspot butterfly (*Euphydryas editha quino*), Hermes copper butterfly (*Lycaena hermes*), western spadefoot (*Spea hammondi*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and the San Diego goldenstar (*Bloomeria clevelandii*). The EIR assesses the proposed project impact to the species referenced in the comment, in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, in Section 4.3, Biological Resources. This EIR section specifically states that “butterflies also would be at risk of habitat fragmentation,” in reference to Quino checkerspot butterfly and Hermes copper butterfly. Fragmentation is also addressed in the habitat corridors analysis; see Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species. As disclosed in the EIR, the proposed project would result in potentially significant impacts related to fragmentation and wildlife corridors. The mitigation strategy for these species would include preservation of existing resources, restoration, and enhancement of currently unsuitable



habitat, and long-term monitoring and adaptive management of resources, including threat reduction which would result in the long-term persistence of these three species within the Habitat Preserve. The proposed project would implement a series of mitigation measures (Mitigation Measures BIO-1, BIO-6, BIO-7, BIO-9, BIO-10, BIO-20, BIO-22, and BIO-23) to preserve on-site habitat areas designed as wildlife movement corridors and provide links to off-site habitat areas, as well as reduce potential indirect impacts to wildlife movement. With the implementation of those measures, wildlife movement and associated fragmentation impacts would be reduced to below a level of significance. Because the comment provided here is general, no additional specific response can be provided. Refer to the Section 4.3 for additional details.

- S4-6:** This comment states that 137 bird species (including 22 special-status species) were observed on the site between 2003 and 2017 and provides a list of some of the species observed. The comment states that the proposed project should include additional habitat protection for coastal California gnatcatcher, coastal cactus wren, and least Bell's vireo (*Vireo bellii pusillus*) and that the configuration of the Habitat Preserve should facilitate the survival of these species. The comment also suggests the EIR should include a detailed study about the

cumulative long-term impacts to the habitat for the MSCP Covered Species.

Appendix D, Biological Resources Technical Report, includes a wildlife compendium as Appendix K that lists all observed species on the project site. Refer to that document for a list of the wildlife species located on the project site.

In regards to the portion of the comment that states that additional habitat is needed for the protection of special-status bird species, as stated in the EIR, the mitigation strategy for these species would include preservation of existing resources, restoration and enhancement of currently unsuitable habitat, and long-term monitoring and adaptive management of resources, including threat reduction for coastal California gnatcatcher, least Bell's vireo, and coastal cactus wren, which would result in the long-term persistence of these three species in the Habitat Preserve as it is currently designed. For the mitigation strategy specifically for coastal California gnatcatcher in the Habitat Preserve, please refer to the Thematic Response – Coastal California Gnatcatcher.

CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. Based on the opinion of the biological experts who prepared the impact analysis, the surveys and studies conducted for the EIR have allowed for

a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project based on the best information available. Cumulative impacts to special-status species are addressed in Section 4.3.6.1, Cumulative Threshold 1: Candidate, Sensitive, or Special-Status Species. As indicated in the EIR, the proposed project, along with all cumulative projects, would be required to comply with applicable regulations that protect special-status wildlife species, including FESA, CESA, the California NCCP, and any adopted habitat conservation plans (e.g., the County of San Diego MSCP). As discussed further in Section 4.3.6.6, Cumulative Threshold 6: Habitat Conservation Plans, and associated Table 4.3-20, Multiple Species Conservation Program Consistency Analysis, the project-specific mitigation would reduce potential impacts to these species, as well as potential future MSCP covered species, to below a level of significance. Based on the opinion of the biological experts who prepared the analysis, compliance with these measures would ensure the proposed project's contribution to effects on species would not be cumulatively considerable, including the species identified in this comment. Refer to Section 4.3.6.1, Cumulative Threshold 1: Candidate, Sensitive, or Special-Status Species; Section 4.3.6.6, Cumulative Threshold 6: Habitat Conservation Plans; and associated Table 4.3-20 for additional details.

S4-6 cont.	<p>(<i>Artemisospiza belli belli</i>), long-eared owl (<i>Asio otus</i>), white-tailed kite (<i>Elanus leucurus</i>), California horned lark (<i>Eremophila alpestris actia</i>), and least Bell's vireo.</p> <p>The California gnatcatcher, the coastal cactus wren, and the least Bell's vireo are identified as MSCP covered species. Because of the large number of special status bird species found on the site, more protection of their existing habitat should be included, as well as the configuration of the reserve designed to facilitate the survival of these species within the project area. The Draft Revised EIR needs to include a detailed study and investigation into cumulative long-term impacts to habitat for the MSCP covered species.</p>
<p><b>Pollinators</b></p>	
S4-7	<p>"San Diego County is considered a global biodiversity hotspot where researchers have documented more than 600 species of native bees, numerous other pollinating insect species, and more plant species than any other county in the United States. According to the researchers, the high biodiversity, coupled with the fact that many plant and pollinator species in the region are threatened by habitat loss and climate change, means that any ecological impact of honey bees on native species could be especially consequential." (<a href="https://www.losangelescountybeekeepers.com/blog/2019/2/28/immense-numbers-of-introduced-honey-bees-overwhelm-native-pollinators-for-access-to-pollen-and-nectar-at-least-in-san-diego">https://www.losangelescountybeekeepers.com/blog/2019/2/28/immense-numbers-of-introduced-honey-bees-overwhelm-native-pollinators-for-access-to-pollen-and-nectar-at-least-in-san-diego</a>)</p>
S4-8	<p>The Draft Revised EIR does not consider or discuss pollinators at all with the exception to note that the introduction of Argentinian sugar ants, which attacks and destroys the native harvester ant nest, the only food source for the Blainville's horned lizard. The report did not survey for the presence of the Crotch's bumblebee (<i>Bombus crotchii</i>) which is the native San Diego bumblebee that has been petitioned for protection as threatened and endangered.</p>
S4-9	<p>No plans have been offered to mitigate for the impact development on this and other insect species or to note that one of the greatest ecological threats to native pollinators is the introduction of European honey bees and that this project and its 'farm' component will introduce European honey bees into an area where they have been distant. This introduction combined with the loss of habitat will be detrimental to native pollinators through permanent take within the proposed preserve boundaries. The Draft Revised EIR needs to include a detailed study and investigation into cumulative long-term impacts to habitat for pollinator species.</p>
<p><b>Oak Woodlands</b></p>	
S4-10	<p>It is known that native Kumeyaay inhabitants of the area utilized tree species from the genus <i>Quercus</i>. This report does not adequately analyze whether or not this land supported oak canopy greater than ten percent cover. In particular, the report notes a decrease in coast live oak woodland since 1997, but lacks to demonstrate historical conditions. AB 2162 Oak Woodlands Protection Act requires mitigation measures for any oak removal on land that supports 10% oak canopy cover; however, no mitigation is provided as a direct issue to tree preservation. The Draft Revised EIR should address historical conditions of oak woodlands in this area prior to recorded wildfires to determine if percent canopy cover was at least 10%.</p>
S4-11	<p>Under Section 4.4: Cultural and Tribal Resources, The Draft Revised EIR states, "The City received one response to the SB 18 consultation letters from Ray Teran, Resource Management for Viejas. In a letter dated October 24, 2018, Mr. Teran stated that the proposed project had been reviewed by Viejas and that the tribe requested a <u>Kumeyaay cultural monitor</u> be on site for ground disturbing activities." Additionally, the Draft Revised EIR states, "The City prepared and sent SB 18 notification letters to the 24 tribes listed with the NAHC on</p>

**S4-7:** The commenter provides general information regarding plant pollinators and states that the EIR does not address pollinators with the exception of Argentinian sugar ants (*Linepithema humile*) potentially impacting native ants that serve as pollinators and a food source for the Blainville's horned lizard (*Phrynosoma blainvillii*). The comment incorrectly states that no pollinator surveys were conducted. Section 4.3 addresses project impacts to candidate, sensitive, or special-status species in accordance with the CEQA Guidelines, Appendix G, issue question. As summarized in that section, as well as detailed in Appendix D, multiple year studies were conducted within the project site for two butterfly species and all bat species, which are also considered pollinator species. The butterfly and bat survey reports include all species recorded during the surveys (see Appendices A–C, Quino Checkerspot Butterfly Survey Reports, and Appendix O, 2016 Focused Bat Survey Results at Fanita Ranch, in Appendix D). It should be noted that it is neither a CEQA requirement nor standard practice to perform pollinator surveys or assess their importance to habitat viability. Based on the opinion of the biological experts who prepare the analysis, the EIR concludes that the amount of high-quality habitat provided in the Habitat Preserve for all wildlife species, including pollinators, would be sufficient to support the long-term persistence of these species and the habitat

itself and would contribute to reducing impacts to less than significant for several species. Furthermore, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. Based on the opinion of the biological experts who prepared the analysis, the surveys conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project. Therefore, no further response is required.

- S4-8:** This comment states that the Crotch's bumblebee surveys were not completed for the project site, and states that this species has been petitioned for protection as threatened and endangered.

It is acknowledged that the Xerces Society for Invertebrate Conservation, Defenders of Wildlife, Center for Food Safety, submitted a petition on October 16, 2018, that included the Crotch's bumblebee (*Bombus crotchii*) and listed as a CESA candidate species in June 2019. Since Crotch's bumblebee was petitioned for listing in October 2018, which initiated a CDFW review process that involves determining if there is enough evidence to warrant elevation to the next step of review, it was listed as a candidate in June 2019, meaning that it satisfied criteria for additional review, providing it with the same interim protections as a listed species until a decision is made. Therefore, Crotch's bumblebee was

not considered a CESA candidate species at the time the Notice of Preparation (NOP) was issued for the EIR, which was November 10, 2018. Since the candidate listing date was after the issuance of the NOP for the EIR, pursuant to CEQA Guidelines, Section 15125, the EIR did not consider Crotch's bumblebee a candidate species. Furthermore, it is neither a CEQA requirement nor standard practice to perform pollinator surveys or assess their importance to habitat viability. There is no standardized survey method currently available for Crotch's bumblebee. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. Based on the opinion of the biological experts who prepared the analysis, the surveys conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project. Therefore, no further response is required.

- S4-9:** This comment states that no mitigation was offered for impacts to Crotch's bumblebee, other insect species, or pollinators. This comment also indicates there would be an impact from the Farm component and the associated introduction of European honey bees, as well as the loss of habitat in the preserve, and suggests a detailed study on cumulative long-term habitat impacts for pollinator species. To clarify, CEQA Guidelines, Section 15126.4,

states that “mitigation measures are not required for effects which are not found to be significant.” The EIR identifies mitigation for potentially significant impacts related to pollinator species as appropriate, including bats, Quino checkerspot butterfly, and Hermes copper butterfly (see Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species). As detailed in response to comment S4-8, Crotch’s bumblebee is not considered a sensitive species herein. As such, impacts would be less than significant, and no mitigation is warranted. Per Section 3.3.5, Farm, in Chapter 3, Project Description, no proposal to introduce European honey bees is proposed as a part of the project, and no associated impact would occur as a result of the proposed project. Refer to response to comment S4-6, as well as Section 4.3.6.1, Cumulative Threshold 1: Candidate, Sensitive, or Special-Status Species, Section 4.3.6.6, Cumulative Threshold 6: Habitat Conservation Plans; and associated Table 4.3-20 regarding cumulative analysis. No additional analysis or mitigation regarding Crotch’s bumblebee is warranted.

- S4-10:** This comment states that native inhabitants of the area use tree species from the genus *Quercus* and that the EIR fails to analyze whether the project site supports oak canopy greater than 10 percent cover and lacks historical conditions for oaks and that no mitigation required by the Oak Woodlands Protection Act is provided as a

direct issue to tree preservation. The comment recommends that the EIR address the historical conditions of oak woodlands prior to the recorded wildfires and determine if percent canopy cover was at least 10 percent.

The comment incorrectly states that an impact analysis and mitigation for impacts to oak trees is not provided in the EIR. The Oak Woodlands Protection Act prohibits a person from removing from oak trees unless an oak removal plan and oak removal permit application for the oak tree removal has been submitted to and approved by the Director of the California Department of Fish and Wildlife. Mitigation Measure BIO-4, Oak Tree Restoration, states that direct impacts to the 5 individual Engelmann oak trees and 17 individual oak trees occurring on the project site shall be mitigated at a ratio of 3:1. Therefore, a total of 66 oak trees shall be planted to meet the 3:1 mitigation ratio requirement.

**S4-11:** The comment includes an excerpt from Section 4.4, Cultural and Tribal Cultural Resources, of the EIR and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR for the proposed project. No further response is required.



S4-12	<p>October 18, 2018. The City received one response from Viejas requesting a <u>Kumeyaay cultural monitor</u> be on site for ground-disturbing activities. No consultation meetings were requested by Viejas or any other tribe contacted under SB 18. Consultation under SB 18 has been closed for the proposed project." Further research and consultation needs to be included in the Draft Revised EIR of how to best incorporate a <u>qualified Kumeyaay cultural monitor</u> on behalf of the all Kumeyaay Bands in the U.S. and Mexico, being that the project area sits within their aboriginal territory. Since the Draft Revised EIR doesn't list the tribes contacted in the public documents, it is unknown which tribes (Bands of Kumeyaay and other tribes) were contacted. The Draft Revised EIR should include consultation not just with the Bands of Kumeyaay, but include other Kumeyaay groups that represent leadership, including but not limited to the Southern California Tribal Chairmen's Association, Kumeyaay Heritage Preservation Committee, and the Kumeyaay Diegueno Land Conservancy. The City of Santee or Project proponent should re-open consultation with these organizations to fully comply with the intent of AB 52. One letter of notification does not meet the criteria for consultation.</p>
S4-13	<p><b>QUALIFIED KUMEYAAY CULTURAL MONITOR</b>          "Native American Monitor" is a generic term for all tribes across the United States. Within the State of California, it is further defined as "California Native American." For projects occurring within the Kumeyaay Nation and the aboriginal territory occupied by the Kumeyaay people for thousands of years and recognized by the California Legislature Assembly Joint Resolution No. 60 adopted on the 29<sup>th</sup> day of August, 2002, it is more accurate and respectful to clarify a "Kumeyaay Cultural Monitor."</p> <p>Based on the information below, a "Qualified Kumeyaay Cultural Monitor" is defined as an individual that is cultural affiliated with the area, has a vested interest, and trusted by tribal leaders.</p> <p>Therefore, the term "qualified" is not only the skills, expertise, and training, it is also the formal recognition by the elected leadership of the individual's tribal association that the leadership acknowledges the individual's skills and approves the individual acting on their behalf as a Kumeyaay Cultural Monitor.</p> <p>Tribal officials are ultimately responsible for vetting the qualifications of the Cultural Monitors whom they choose to represent their tribe. Cultural Monitors are intended to be trusted tribal representatives who will have firsthand exposure to field activities so that they may make recommendations to the archaeologist onsite, as well as directly report their observations to their tribal leadership and/or community.</p> <p>Encouraging the use of "Native American Monitor" allows any individual claiming native status to pursue monitoring work in the Kumeyaay Territory.</p> <p>The Native American Heritage Commission Guidelines for Native American Monitors/Consultants (nahc.ca.gov), recommends that preference for monitor/consultant positions be given to California Native Americans culturally affiliated with the project area. These Native Americans will usually have knowledge of the local customs, traditions, and religious practices. They are also aware of the <u>local tribal leaders, elders, traditionalists, and spiritual leaders</u>. Since it is their traditional area being impacted, culturally affiliated Native Americans have a vested interest in the project.</p>
S4-14	<p>The Conservancy offers the following comments and recommendations to assist the City of Santee in avoiding or minimizing potential project impacts on biological resources.</p> <p>Specific Comments</p>
S4-15	<p>1. The Conservancy recommends the City of Santee ensure an adequately-sized north-south</p>

**S4-12:** The comment requests “further research and consultation” regarding incorporation of a Kumeyaay cultural monitor. The comment further claims that the EIR “doesn’t list the tribes contacted in the public documents,” and thus it is unknown which bands were contacted.

See Mitigation Measure CUL-6 (Native American Construction Monitoring), which sets forth the requirements for a minimum of one Native American monitor to be present during ground-disturbing activity for project construction. Mitigation Measure CUL-6 already provides, “The Native American monitors shall be of Kumeyaay descent.” Mitigation Measure CUL-6 has been revised to further clarify the qualifications of the Native American monitor:

**CUL-6: Native American Construction Monitoring.** A minimum of one Native American monitor shall be present during ground-disturbing activity for project construction, including but not limited to site clearing, grubbing, trenching, and excavation, for the duration of the proposed project or until the qualified archaeologist determines monitoring is no longer necessary. The Native American monitors shall be of Kumeyaay descent with ancestral ties to the San Diego region and at minimum 1 year of monitoring experience within Kumeyaay ancestral territory. The Native American monitors shall prepare daily logs

and submit weekly updates to the qualified archaeologist and the Project Planner at the City of Santee. In addition, the Native American monitors shall prepare and submit a summary statement upon completion of monitoring to include in the Cultural Resources Monitoring Report prepared for the proposed project (see Mitigation Measure CUL-5). The Project Planner at the City of Santee shall review and include the summary statement as part of the cultural resources monitoring report prepared for the proposed project.

Further, as explained in Section 4.4.1.3 (Known Cultural Resources, Senate Bill 18 Consultation and Assembly Bill 52 Consultation) in Section 4.4, the City notified the 24 tribes on the list provided by the NAHC for SB 18 and the three tribes on the list of tribes that have requested noticed of projects under AB 52 maintained by the City and consulted with all tribes that responded to the notices. As further explained in the EIR, the time period for responding to the notices has expired. No further consultation is required.

Correspondence with the tribes may be found in the administrative record posted on SharePoint and released with the Notice of Availability of the Draft Revised EIR for the Fanita Ranch Project on May 29, 2020 (see <https://www.cityofsanteeca.gov>.) The specific correspondence is located in Section (G), Remainder of

the Record, Subsection (7), Tribal Consultation under AB 52 and SB 18. The cultural resources reports for the proposed project, which also contain such correspondence with the tribes, include confidential and sensitive information. As explained on the cover pages for Appendices E1 through E4 of the Draft EIR, persons meeting the qualifications to review such reports may request an appointment at the City to do so.

- S4-13:** The comment appears to further request a qualified Kumeyaay cultural monitor, which has already been included in Mitigation Measure CUL-6. See response to comment S4-12. No further response is required.
- S4-14:** This comment provides an introduction to the comments below. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- S4-15:** The commenter recommends the City ensure an adequately-sized north-south wildlife movement corridor consistent with the MSCP guidelines and continued restoration to maintain the corridor. Implementation of the current project design would be consistent with the Draft Santee MSCP Subarea Plan and MSCP Guidelines, specifically the criteria listed in the MSCP General Preserve Design (a) through (e) (City of San Diego 1998). See the response to Comment Letter

L4 (San Diego Association of Governments, July 13, 2020) for details on the MSCP General Preserve Design criteria and how the proposed Habitat Preserve design is consistent with these criteria.

Additionally, the Habitat Preserve was designed to the NCCP/HCP conservation standard and is consistent with the Design Criteria for Linkages and Corridors (Attachment H) in the approved South County MSCP Subarea Plan Biological Mitigation Ordinance (BMO). The BMO Design Criteria for Linkages and Corridors contain discrete standards for the length and width of wildlife movement areas, as well as other required features to protect the biological value of linkages and corridors such as maintaining lines of sight and vegetative cover. The Habitat Preserve design process was informed by the wildlife movement field studies intended to ensure ease of movement for wide-ranging species, such as mule deer (*Odocoileus hemionus*), and would contain an approximately 900-acre block, connected to other preserves within the vicinity generally by 1,000 feet or more. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

S4-15 cont.	wildlife movement corridor consistent with MSCP guidelines for the duration of the project and subsequent restoration in order to ensure a functional wildlife corridor.
S4-16	2. The Conservancy recommends updated surveys and analyses of impacts for the least Bell's vireo ( <i>Vireo bellii pusillus</i> ), California gnatcatcher ( <i>Poliopitia californica californica</i> ), yellow-breasted chat ( <i>Icteria virens</i> ) and San Diego ambrosia ( <i>Ambrosia pumila</i> ).
S4-17	3. The Conservancy recommends the City of Santee further analyze the direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the Draft Revised EIR.
S4-18	a) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCFP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the Draft Revised EIR.
S4-19	b) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
S4-20	c) A cumulative effects analysis should be developed as described under California Environmental Quality Act (CEQA) Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
S4-21	4. 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.
S4-22	5. 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.
	<b>Riparian Mitigation</b>
S4-23	The riparian mitigation for damage to Sycamore Creek is only 1:1. There are 24 acres of long-term impacts to riparian systems. The project is only proposing 1:1 mitigation and not the standard 3:1 mitigation that is required by most projects. That would be approximately 75 acres. Not only is the mitigation ratio low, there is currently little to no mitigation available within the San Diego River, riparian areas. This project cannot be self-mitigating. A substantial plan for the development of reasonable mitigation must be developed and presented to the community.
S4-23	The proposed Project would alter the physical conditions of the natural environment, an implementation will cause multiple environmental impacts including significant impacts to habitat, wildlife, water quality, soil and microbial health, air quality, vegetation, both cultural and tribal resources, as well as agricultural and forest resources.
S4-23	The significant versus non-significant impacts and the mitigation analyses do not adequately address the cumulative impacts to human and animal health, the environment, and the historic and culturally significant elements within the Project site.

**S4-16:** The comment recommends conducting updated surveys and analyses for impacts to the least Bell's vireo, coastal California gnatcatcher, yellow-breasted chat (*Icteria virens*), and San Diego ambrosia (*Ambrosia pumila*). CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. Based on the opinion of the biological experts who prepared the analysis, the surveys and studies conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project based on the best information available. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Nonetheless, a preconstruction survey (see Mitigation Measure BIO-14) would be conducted for the nesting bird species referred to in the comment.

**S4-17:** This comment provides a summary of impact recommendations and specifically recommends additional discussions regarding indirect impacts to nearby areas, including maintenance of and access to wildlife corridors. Indirect impacts are addressed throughout the impact analysis within Section 4.3.5, Project Impacts and Mitigation Measures. Various significant indirect impacts were identified in the analysis, and mitigation was identified

to reduce these potential impacts to below a level of significance. This includes but is not limited to management of the proposed Habitat Preserve on site (Mitigation Measure BIO-1), stormwater pollution prevention plan (Mitigation Measure BIO-7), monitoring during grading (Mitigation Measure BIO-8), land use adjacency guidelines (Mitigation Measure BIO-6), measures to prevent access to open space (Mitigation Measure BIO-9), and open space wildlife protection (Mitigation Measure BIO-20). These measures include maintenance requirements of the on-site Habitat Preserve that include the wildlife corridor areas. In addition, the proposed project would control access through the site open space areas as described in the aforementioned mitigation measures, Section 3.3.1.10, Habitat Preserve; Section 3.4.1.3, Alternative Transportation Network (see subheading Trails); and Figure 3-6, Conceptual Park, Trails, and Open Space Plan. Because no specific comment regarding indirect impacts is provided by this comment, and this comment does not provide specific maintenance or access suggestions, a specific response cannot be provided. Furthermore, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. Based on the opinion of the biological experts who prepared the analysis, the surveys conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project. Therefore, no further response is required.

- S4-18:** This comment indicates that the zoning for development projects may contribute to wildlife-human interactions and suggests mitigation should be identified in the EIR for such conflicts. Refer to response to comment S4-17 regarding the proposed project's indirect impacts, which include potential wildlife-human interaction impacts as identified in the Section 4.3.5, Project Impacts and Mitigation Measures. In conclusion, no additional mitigation related to cumulative wildlife-human interactions is warranted beyond that identified in the Draft EIR.
- S4-19:** This comment indicates a cumulative plant community and wildlife habitat impact analysis should be conducted. Such analysis is included in Section 4.3.6, Cumulative Impact and Mitigation Measures. As no specific comment regarding cumulative impacts is provided by this comment, no further response can be provided.
- S4-20:** This comment provides a general suggestion that the proposed Habitat Preserve should be contiguous on-site as well as contiguous with off-site areas to provide functional linkages, and roads or structures should not fragment the Habitat Preserve. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, it is noted that the proposed Habitat Preserve is included as a part of the project, and the associated design process was informed by the

wildlife movement field studies intended to ensure ease of movement for wide-ranging species such as mule deer, and would contain an approximately 900-acre block, connected to other preserves within the vicinity generally by 1,000 feet or more. The Habitat Preserve is evaluated throughout Section 4.3. This includes the evaluation of potential impacts to wildlife corridors and the identification of mitigations measures to reduce associated impacts to below a level of significance. Refer to Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, for additional information. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

- S4-21:** This comment provides a suggestion to conserve the main east-west drainage so it may provide a linkage for covered species and other species that depend on wildlife corridors. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, it is unclear which specific drainage this comment suggests for conservation considering there are several east-west drainages (see Figure 4.3-1, Jurisdictional Aquatic Resources). However, if the comment is referring to Sycamore Canyon Creek, which is the main drainage that runs through the project site from north to south, it will not be impacted and will be included in the Habitat Preserve. As stated in EIR Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife



Species, to the west, a large corridor buffering Sycamore Canyon Creek is provided. This corridor is between 1,000 and 400 feet wide (at the detention basin which could also be used for movement), but is further widened by the adjacent military base and conserved preserve areas along the entire boundary (see Figure 4.3-9).

- S4-22:** The comment states that the riparian mitigation for impacts to Sycamore Creek is provided at a 1:1 ratio, instead of the standard 3:1 ratio, which is too low. The comment states that there is currently little to no mitigation available within the San Diego River riparian areas, and therefore, the project cannot be self-mitigating. Lastly the comment states that a substantial plan for the development of reasonable mitigation must be developed and presented to the community.

Appendix D, Biological Resources Technical Report, Table 6-8, summarizes the impacts to jurisdictional aquatic resources and the required mitigation ratio. The comment incorrectly states a 1:1 ratio would be used, since all the jurisdictional aquatic resources would be mitigated at a 2:1 to 3:1 ratio depending on the resource being impacted. Impacts to jurisdictional resources require permit issuance by the U.S. Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) prior to impacts and the ratios are subject to agency approval.

The EIR proposes a mitigation program that would include off-site mitigation of wetland habitat that is comparable in habitat type and quality to the impact area will be enhanced, restored, or created within the City's jurisdiction and within the San Diego River and/or its tributaries. As stated in the EIR, based on preliminary evaluations, several opportunities have been identified to provide off-site mitigation for the remaining creation/re-establishment mitigation component, indicating that it is feasible to accomplish the off-site compensatory mitigation. The EIR includes a Wetland Mitigation Plan (Appendix S to the Biological Resources Technical Report) that describes the mitigation program. Therefore, the City disagrees that a substantial plan has not been developed or distributed to the public.

**S4-23:** This comment states that the proposed project would alter the physical conditions of the natural environment, including significant impacts to habitat, wildlife, water quality, soil and microbial health, air quality, vegetation, both cultural and tribal resources, as well as agricultural and forest resources. Section 4.3 acknowledges that the proposed project would alter the natural environment and includes a project-specific mitigation program that would reduce potentially significant impacts to less than significant. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

S4-24 The Draft Revised EIR relies upon future compliance with its management plans to mitigate significant impacts, introducing the very uncertainty in decision making that CEQA was designed to avoid. It is unacceptable under CEQA to assume that mitigation will be sufficient without a comprehensive understanding of the significance of the impacts that the mitigation measures are meant to address.

When an agency preparing an impact report is required to examine future events that are difficult to forecast, the agency "must use its best efforts to find out and disclose all that it reasonably can" (CEQA Guidelines § 15144; Planning and Conservation League v. Castaic Lake Water Agency (2009) 180 Cal.App.4th 210, 242). The Revised Draft SEIR must remedy this deficiency by mandating specific and detailed requirements for the mitigation of the significant impacts via future projects.

S4-25 The Draft Revised EIR defers specification of numerous mitigation measures until after the completion of environmental review in violation of CEQA. "[M]itigation measure[s] [that do] no more than require a report be prepared and followed" do not provide adequate information for informed decision making under CEQA. (Endangered Habitats League, Inc. v. County of Orange (2005) 131 Cal.App.4th 777, 794; CEQA Guidelines §15126.4(a)(1)(B)). The Revised Draft SEIR must address this deficiency by completing additional needed surveys, reports, tribal consultation, and studies before any final decision is made. Deferring this analysis until after the City of Santee has certified the EIR and approved the Project could result in impacts that were never evaluated or considered in violation of CEQA.

CEQA mandates that "[a]ll phases of a project must be considered when evaluating its impact on the environment." (CEQA Guidelines § 15126.) The Draft Revised EIR's selective analysis – and its conclusions based thereon – stymie CEQA's informational goals and violate CEQA's mandate that EIRs "be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (CEQA Guidelines §15151). Because of the extent of the inadequacies in the current Draft SEIR, the comments submitted and the questions raised during this Draft SEIR should be addressed in a rerelease as a Draft rather than as a Final EIR for the Project.

S4-26 The San Diego River Conservancy appreciates the opportunity to review and comment on this Draft Revised EIR and Conservancy staff is available to discuss the concerns, comments and recommendations in greater detail. Please contact Conservancy at [Dustin.harrison@sdrc.ca.gov](mailto:Dustin.harrison@sdrc.ca.gov) or 619-390-0571.

Thank you for your time and consideration reviewing these comments.

*Dustin Harrison*

**S4-24:** The commenter appears to question the adequacy of the mitigation measures for potential impacts to riparian habitat but does not specify which mitigation measures are inadequate other than a reference to “future compliance with its management plans.” As explained in Section 4.3.5.2 of the EIR, implementation of Mitigation Measures BIO-1, BIO-2, BIO-6 through BIO-12, and BIO-15 listed in Section 4.3.5.1 would mitigate all direct and indirect permanent and temporary impacts to riparian habitats and other sensitive natural communities to below a level of significance. Detailed, proposed drafts of any management plans referenced in these measures (e.g., Preserve Management Plan, Upland Restoration Plan, Vernal Pool Mitigation Plan, and Wetland Mitigation Plan) are included as appendices to the Biological Resources Technical Report (Appendix D) or as Land Use Adjacency Guidelines as specified in the Draft Santee Multiple Species Conservation Program (MSCP) Subarea Plan (BIO-6).

Under Section 15126.4(a)(1) of the CEQA Guidelines, while an EIR may not defer the formulation of mitigation measures to a future time, mitigation measures may specify performance standards that would mitigate the project’s significant effects and may be accomplished in more than one specified way. Compliance with a regulatory permit or other similar process, for example, may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on

substantial evidence in the record, to reduce the significant impact to the specified performance standards. “An EIR is inadequate if ‘[t]he success or failure of mitigation efforts may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR.’ ” (Preserve Wild Santee v. City of Santee (2012) 210 Cal.App.4th 260, 281). Here, in contrast, the proposed management plans are included in the EIR as the minimum performance standards the proposed project must satisfy and have been made subject to public review. The comment does not allege any deficiency in such plans. See also Section 4.3.7 of the EIR (Comparison of Proposed Project to 2007 Project).

- S4-25:** The comment asserts that the EIR “defers specification of numerous mitigation measures until after the completion of environmental review” but does not specify which mitigation measures or portions of the CEQA analysis are inadequate. See responses to comments S4-11 through S4-13 and S4-24 related to riparian habitat and cultural resources. No significant new information has been added to the EIR that would warrant recirculation under CEQA Guidelines, Section 15088.5.
- S4-26:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter L1: City of San Diego, July 13, 2020



July 13, 2020

Chris Jacobs, Principal Planner  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071

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

Dear Mr. Jacobs:

The City of San Diego ("City") Planning Department has received the Draft Revised Environmental Impact Report (EIR) 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 Draft Revised EIR 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 Draft Revised EIR for your consideration.

•••

**TRANSPORTATION & STORM WATER DEPARTMENT – MARK G. STEPHENS, ASSOCIATE PLANNER –**  
[MGStephens@sanidiego.gov](mailto:MGStephens@sanidiego.gov), 858-541-4361

1. **Section 4.9 (Hydrology and Water Quality, page 4.9-33, Impact Analysis: Habitat Preserve, Page 3.** In the first sentence under this heading, please revise the reference to the "San Diego River Hydraulic Unit (HU)" to the "San Diego Hydrologic Unit (HU)." As noted elsewhere in this section, the project site is also part of the Lower San Diego Hydrologic Area (907.10) and Santee Hydrologic Subarea (907.12).

**DEVELOPMENT SERVICES DEPARTMENT - LOCAL ENFORCEMENT AGENCY – BRIAN PANTHER, SOLID WASTE INSPECTOR III –**  
[HPanther@sanidiego.gov](mailto:HPanther@sanidiego.gov), 619-533-3675

1. The City recommends that landfill gas monitoring be performed while excavating, digging, or trenching within 1,000 feet of Sycamore Landfill.
2. The City recommends that any debris uncovered during excavating, digging, or trenching be placed back into the same hole from which it came and covered.
3. The City recommends that a community safety and health plan be developed prior to construction.

**L1**

**L1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L1-2:** This comment requests the phrase "San Diego River Hydraulic Unit (HU)" be revised to say "San Diego Hydrologic Unit (HU)." The City of Santee (City) acknowledges this request. However, because this does not change any conclusions to the proposed project's EIR, the reference to the "San Diego River Hydraulic Unit (HU)" will remain unchanged.

The comment also states that the project site is part of the Lower San Diego Hydrologic Area (907.10) and Santee Hydrologic Subarea (907.12), which has been documented in Section 4.9, Hydrology and Water Quality, in the EIR.

**L1-3:** This comment recommends that landfill gas monitoring be performed while excavating, digging, or trenching within 1,000 feet of the Sycamore Landfill. The City has confirmed that the project site is not within 1,000 feet of the landfill. Therefore, based on correspondence from Brian Panther (attached), this comment is not applicable.

- L1-4:** This comment recommends the debris uncovered during excavating, digging, or trenching be placed in the same hole from which it came and covered. Based on correspondence from Brian Panther (provided in Section 4.4, Attachments to Responses to Comments), this comment can be disregarded because the project site is not within 1,000 feet of the Sycamore Landfill.
- L1-5:** This comment states that a community safety and health plan be developed prior to construction. Based on correspondence from Brian Panther (attached), this comment can be disregarded because the project site is not within 1,000 feet of the Sycamore Landfill.

Page 2  
Mr. Chris Jacobs  
July 13, 2020

PARKS AND RECREATION DEPARTMENT - OPEN SPACE DIVISION - LAURA BALL, PROJECT OFFICE II -  
[LBall@sandiego.gov](mailto:LBall@sandiego.gov), 619-685-1301

L1-6

1. **Section 4.15, Recreation, page 4.15-5:** Please update the Mission Trails Regional Park (MTRP) discussion in Section 4.15, Recreation, to reflect the MTRP Master Plan since the adoption of the Master Plan Update in Spring 2019.

**Mission Trails Regional Park.** The center of Mission Trails Regional Park is located approximately 5.4 miles southwest of the project site and encompasses ~~7,220~~ 9,780 acres of both natural and developed recreational areas (Figure 4.15-1). Started in 1974, Mission Trails Regional Park has become one of the largest urban parks in the U.S. With about 690 miles of trails, boating on Lake Murray, camping at Kumeyaay Lake, numerous informative and organized hikes, and a state-of-the-art Visitor and Interpretive Center, Mission Trails Regional Park provides a host of recreational and educational opportunities (Mission Trails Regional Park Foundation 2020). The East Elliott and West Sycamore Expansion Subareas, added to the park as part of the 2019 Mission Trails Regional Park Master Plan Update, are west and northwest of the project site (Mission Trails Regional Park Master Plan Update).

L1-7

2. **Figure 4.15-1:** Please update Figure 4.15-1 with the updated MTRP boundary and add the Stowe Trail described in the Trails Section on page 4.15-6.

L1-8

3. **Public Access Plan (Appendix T of Appendix D, Biological Resources Report), Figure 4:** Please clarify that the "CONNECTION TO STOWE TRAIL AND WESTON" where it is shown on the figure is also "VIA MCAS MIRAMAR AND MISSION TRAILS REGIONAL PARK."

DEVELOPMENT SERVICES DEPARTMENT - PEDRO VALERA, ASSOCIATE TRAFFIC ENGINEER -  
[PValera@sandiego.gov](mailto:PValera@sandiego.gov), 619-446-5382

L1-9

The City appreciates the inclusion of both a Level of Service (LOS) analysis and Vehicle Miles Traveled (VMT) analysis in anticipation of Senate Bill 743's mandate to replace LOS with VMT as the standard performance metric for analyzing transportation impacts under CEQA. The City's comments related to LOS impacts should be considered as they relate to land use and mobility planning, outside of the CEQA process.

L1-10

1. **Page 1-68, Table 1-1:** Impact TR-9 is shown as Significant and Unavoidable. Fanita Ranch should implement any feasible mitigations such as widening the westbound approach at the intersection of Mast Boulevard and SR-52 WB Ramps to provide 1 shared thru-right lane and 2 right turn lanes in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

L1-11

2. **Pages 1-68, Table 1-1:** Impact TR-10 is shown as Significant and Unavoidable. Fanita Ranch should implement any feasible mitigations such as widening the Intersection of Mast Boulevard and West Hills Parkway respective approaches to provide 1 left turn lane, 3 thru lanes, and 1 right turn lane eastbound; 2 left turn lanes, 2 thru lanes, and 1 shared thru lane/right turn lane westbound; 2 left turn lanes and 1 shared thru lane/right turn lane northbound; and 1 shared thru lane/left turn lane, 1 right turn lane southbound in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

L1-12

3. **Pages 1-73, Table 1-1:** Impact TR-21 is shown as Significant and Unavoidable. Fanita Ranch should implement any feasible mitigations such as implementation of Mitigation Measure TRA-9, in coordination with the City of San Diego and Caltrans to reduce the impact to below a level of significance.

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**L1-6:** This comment requests revisions to the discussion of Mission Trails Regional Park in Section 4.15.1, Environmental Setting, in Section 4.15, Recreation. The City agrees with this request, and Section 4.15.1 in Section 4.15 has been revised to state the following:

**Mission Trails Regional Park.** The center of Mission Trails Regional Park is located approximately 5.4 miles southwest of the project site and encompasses 9,780 ~~7,220~~ acres of both natural and developed recreational areas (Figure 4.15-1). Started in 1974, Mission Trails Regional Park has become one of the largest urban parks in the U.S. With about 90 ~~60~~ miles of trails, boating on Lake Murray, camping at Kumeyaay Lake, numerous informative and organized hikes, and a state-of-the-art Visitor and Interpretive Center, Mission Trails Regional Park provides a host of recreational and educational opportunities (Mission Trails Regional Park Foundation 2020). The East Elliot and West Sycamore Expansion Subareas, added to the park as part of the 2019 Mission Trails Regional Park Master Plan Update, are west and north of the project site (Mission Trails Regional Park Master Plan Update 2019).

**L1-7:** This comment requests Figure 4.15-1, Parks and Recreational Facilities in Santee, in Section 4.15 be revised to include the updated Mission Trails Regional Park boundary and Stowe Trail. The City acknowledges

this request. However, this does not change any conclusions in the proposed project's EIR.

- L1-8:** The comment asks to clarify a label, shown on Figure 4 of the Public Access Plan, Appendix T of the Biological Resources Technical Report (Appendix D), stating that the “Connection to Stowe Trail and Weston” should include “Via MCAS Miramar and Mission Trails Regional Park.” The City agrees that further clarification is warranted.

Figure 4 of the Public Access Plan (Appendix T to Biological Technical Report [Appendix D]) has been revised to state the following:

Connection to Stowe Trail and Weston via MCAS Miramar and East Elliott Expansion Area of Mission Trails Regional Park.

It should be noted that Figure 4 of the Public Access Plan was taken directly from the Fanita Ranch Specific Plan and has been revised in that document as well. This revision is a clarification to the EIR and does not change any conclusions.

- L1-9:** This comment provides an introduction to the transportation comments section. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.



- L1-10:** This comment discusses Mitigation Measure TRA-9 as being significant and unavoidable. The intersection of Mast Boulevard at the State Route (SR-) 52 Westbound Ramps (addressed in Mitigation Measure TRA-9) is located both within the City of San Diego's and California Department of Transportation's (Caltrans') jurisdictions. The applicant has privately funded a Caltrans Project Study Report – Project Development Support, dated January 2020, for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. Since this intersection is within the City of San Diego's and Caltrans' jurisdictions, the City is without jurisdiction to ensure the construction of the recommended improvements. Therefore, under CEQA, the impact is considered significant and unavoidable. The applicant requested a meeting with City of San Diego staff on July 24, 2020, to discuss the impacts and mitigation measures in the City of San Diego.
- L1-11:** This comment discusses Mitigation Measure TRA-10, the Mast Boulevard/West Hills Parkway/Sycamore Landfill intersection, and that the proposed project should implement the recommended improvements identified in the EIR. Because this intersection is located within the City of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, under CEQA,

the impact is considered significant and unavoidable. The applicant requested a meeting with City of San Diego staff on July 24, 2020, to discuss the impacts and mitigation measures in the City of San Diego.

- L1-12:** This comment discusses Mitigation Measure TRA-21, the Mast Boulevard segment between SR-52 Westbound Ramps and West Hills Parkway/Sycamore Landfill, and states that the proposed project should implement the recommended improvements identified in the EIR for Mitigation Measure TRA-9. Because this intersection is within the City of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, under CEQA, the impact is considered significant and unavoidable. The applicant requested a meeting with City of San Diego staff on July 24, 2020, to discuss the impacts and mitigation measures within the City of San Diego.

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- L1-13 | 4. **Table 1-1:** Impacts TR-9, TR-10 and TR-21 are not consistent with proposed mitigations at these respective locations from the Sycamore Landfill FEIR (PTS #5617, 08/03/2012) and Castlerock FEIR (PTS #10046, 07/11/2013). No revisions are necessary.
- L1-14 | 5. **Page 4.16-24:** The DEIR states that “projects within 0.25 miles of either an existing major transit stop or a stop along an existing high-quality transit corridor should generally be presumed to cause a less than significant transportation impact.” The DEIR should be revised to state “projects within 0.5 miles of an existing major transit stop or...” to be consistent with CEQA Guidelines implementing SB 743.
- L1-15 | 6. **Page 4.16-31:** The DEIR states that “the threshold for significance for projects located within the City would be exceeded if a project’s VMT per capita is higher than 85 percent of the Citywide average VMT per capita.” The DEIR should specify that this threshold is for the residential component of the project and provide discussion of significance thresholds for the non-residential component of the project.
- L1-16 | 7. **Page 4.16-108 and Table 4.16-29:** The DEIR proposes AIR-6 Transportation Demand Management “to reduce project impacts associated with VMT.” However, TDM measures categorized as Land Use/Location and Neighborhood/Site Enhancements are identified as project features in Appendix N Transportation Impact Analysis section 19.4. If the TDM is a design feature, the VMT reduction should be included in the project baseline VMT as opposed to required mitigation.

• • •

L1-17 | Thank you for the opportunity to provide comments on the Draft Revised EIR. 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](mailto: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

**L1-13:** This comment states inconsistencies between the proposed project mitigation at City of San Diego study area locations and mitigation measures from other nearby project EIRs from 2012 and 2013. The comment also states that “no revisions are necessary.” It should be noted that the proposed mitigations are not consistent with the Sycamore Landfill EIR and Castle Rock EIR mitigation plans because those EIRs did not include the proposed project’s traffic as now proposed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L1-14:** This comment states that the EIR misstates the criteria from the CEQA Guidelines by using 0.25-mile distance instead of a 0.5-mile distance for qualifying as being located within proximity to transit. The City agrees with this request, and Section 4.16.2.2, State, California Department of Transportation Standards, has been revised to state the following:

Under the VMT standard, projects within ~~0.25~~ 0.5 mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should generally be presumed to cause a less than significant transportation impact.

- L1-15:** This comment discusses the vehicle miles traveled (VMT) per capita analysis performed for the proposed project and requests that the EIR specify the differences between the VMT per capita and VMT per employee thresholds. At the time of preparation of the VMT analysis for the proposed project, official local guidelines were not yet published or adopted to establish an exact approach and method for evaluating the proposed project's VMT. Given these circumstances, the total site population for all primary land uses (not separated into residents and employees) was grouped into a "per capita" population and measured against the "per capita" population of the City. This approach resulted in a significant VMT per capita impact identified in the EIR, and mitigation measures were proposed. Nonetheless, the VMT impact remains significant and unavoidable given the proposed VMT exceeds the threshold of significance by more than 15 percent and the maximum allowable reduction using VMT reduction measures from the California Air Pollution Control Officers Association Quantifying Greenhouse Gas Mitigation Measures (August 2010 handbook) for a project in a "suburban context" is 15 percent. Therefore, this issue is adequately addressed in the EIR.
- L1-16:** The comment identifies that VMT reduction measures are not separated by Project Design Features (PDF) and Mitigation Measures (MM). In this respect, the EIR does

not differentiate between PDFs and MMs. Whether the PDFs are applied prior to measuring the proposed project's impact or after, the pre- and post-VMT reduction amounts are the same. Thus, incorporating the PDFs into the VMT per capita prior to comparing it to the Citywide average or incorporation the PDFs with the MMs, as done in the EIR, would neither result in a change in conclusions of significance for the VMT analysis nor change the numerical results of the VMT analysis. Therefore, this issue is adequately addressed in the EIR.

**L1-17:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter L2: County of San Diego, July 13, 2020



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July 13, 2020

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**REQUEST FOR COMMENTS ON THE NOTICE OF AVAILABILITY (NOA) OF A DRAFT REVISED ENVIRONMENTAL IMPACT REPORT (EIR) FOR FANITA RANCH FOR THE CITY OF SANTEE**

Dear Mr. Jacobs,

L2-1 The County of San Diego (County) reviewed the City of Santee's (City) NOA of a Draft Revised EIR for Fanita Ranch (Project), received on May 28, 2020.

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**

L2-2 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**

L2-3 2. The proposed Project trip generation is 31,213 Average Daily Trips (ADT) with 3,198 trips (1,188 inbound/2,010 outbound) during the AM peak hour and 2,956 trips (1,924 inbound/1,032 outbound) during the PM peak hour. The EIR identifies Direct, Cumulative, and Horizon Year impacts to the following County roadway facilities:

a. **Intersections (Page 4.16-37-73 / Table 4.11-12, 15-18):**

i. El Nopal / Los Ranchitos Road (Cumulative & Horizon Year)

**L2**

**L2-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L2-2:** This comment provides information regarding the County of San Diego's (County's) environmental review guidelines. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L2-3:** This comment provides an informational list of facilities impacted by the proposed project within the County's jurisdiction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

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- L2-3 cont.
  - ii. Riverford Road / SR-67 SB Ramps (Direct, Cumulative, & Horizon Year)
  - iii. Riverford Road and Woodside Avenue (Direct, Cumulative, & Horizon Year)
  - b. Road Segments (Page 4.16-69 / Table 4.16-18):
    - i. El Nopal (Los Ranchitos Road to Riverford Road) (Direct, Cumulative, & Horizon Year)
    - ii. Riverford Road (Riverside Drive to SR-67 Ramps) (Direct, Cumulative, & Horizon Year)
- L2-4 3. Figure 4-1 Existing Conditions identified Riverford Road as a 3L facility. Riverford Road from North Woodside Avenue to SR-67 WB Ramp is a 2-lane roadway with one travel lane in each direction.
- L2-5 4. The traffic analysis did not analyze the intersection of Riverford Road/N Woodside Avenue.
- L2-6 5. The EIR (Mitigation Measures Page 4.16-86 to -100) states that the above impacts would be considered "significant and unavoidable." The County requests the Final EIR consider potential "fair share" contributions towards significant traffic impacts to County facilities. More specifically, the County recommends the consideration of mitigation towards improvements to the road segment of Riverford Road within the County's jurisdiction based on the following:
  - a. The road segment of Riverford Road within the County jurisdiction, and the interchange of SR-67 and Riverford Road, is a major junction for local and regional traffic. The existing interchange operates unacceptably due to congestion and current roadway design. The general increase in traffic from the Fanita Ranch project is projected to further degrade this road segment and interchange.
  - b. The County of San Diego in coordination with private development stakeholders, and Caltrans with permitting oversight, have been advancing proposed operational improvements to traffic circulation along Riverford Road from N. Woodside Avenue to Woodside Avenue in the vicinity of the SR-67 interchange. An Intersection Control Evaluation (ICE) Report was approved by Caltrans District 11 on January 10, 2020. The County of San Diego is currently implementing local agency developing a Project Initiation Document (PID) for the preliminary design of project alternatives, including improving Riverford Road with an alternative for the installation of two roundabouts at the SR-67 interchange.
  - c. The County's request for "fair share" mitigation is consistent with the County's discretionary approval of land development projects, as well as the collection of traffic impact fees for this area. Contributions as part of the Fanita Ranch project will continue to help advance this much needed transportation improvement project.
- L2-7 6. The EIR shows no Mast Boulevard connection between the City of Santee and the County of San Diego. The Project traffic volumes result in significant impacts to El Nopal and Riverford Road. The Project and the City should reconsider completing the Mast Blvd. connection, which would result in a redistribution of traffic that could reduce and/or eliminate significant roadway impacts in the region.
- L2-8 7. The EIR (Page 4.16-101) Vehicle Miles Traveled (VMT) section states that the proposed Project's VMT Impact after Mitigation is still "Significant and unavoidable." The Project should be revised until the traffic impacts are adequately mitigated.

**L2-4:** This comment states that the EIR identifies Riverford Road as a three-lane facility from North Woodside Avenue to State Route (SR-) 67 Westbound Ramps when the County considers it a two-lane road. The segment analyzed in the EIR is identified as "Riverford Road from Riverside Drive to SR-67 Ramps." The entire segment is approximately 1,850 feet in length. The portion from North Woodside Avenue to the SR-67 Ramps is approximately 230 feet from centerline to centerline. This accounts for 12 percent of the entire segment. Using the two-lane capacity in the analysis for a section of the roadway representing 12 percent of the total segment would not accurately represent the conditions of the roadway. The Transportation Impact Analysis (Appendix N in the EIR) accurately concluded that the proposed project would significantly impact Riverford Road as a three-lane road, and the same conclusion would be drawn if it was assumed to function as a two-lane roadway. Since this segment is within the County's jurisdiction, the City of Santee (City) is without jurisdiction to ensure the construction of the recommended improvements. Therefore, per the purposes of the CEQA, the impact is considered significant and unavoidable. The applicant sent an email to Eric Lardy at the County on July 24, 2020, requesting a meeting to discuss the County's comments regarding impacts and mitigation measures.



- L2-5:** This comment states that the EIR does not analyze the intersection of Riverford Road at North Woodside Avenue. As shown in the Transportation Impact Analysis (Appendix N), Figure 7-1, Project Trip Distribution, 0 percent of proposed project trips would be distributed to North Woodside Avenue from the Riverford Road intersection. Therefore, no trips are assigned to the critical movement at this unsignalized intersection: the eastbound left-turn. The County's significance criteria used in the EIR identifies significant level of service impacts at unsignalized intersections based on the number of proposed project trips assigned to the minor street critical movement, which is the eastbound left-turn. Thus, there is no nexus for the proposed project to analyze this intersection. This issue is adequately addressed in the EIR.
- L2-6:** This comment first states that the impacted locations within the County's and the California Department of Transportation's (Caltrans') jurisdictions are concluded significant and unmitigated in the EIR. The County is requesting a fair share toward these improvements. Mitigation measures are recommended in the EIR for these locations. Because these locations are within the County's and Caltrans' jurisdictions, the City is without jurisdiction to ensure the construction of the recommended improvements. Therefore, under CEQA, the impact is considered significant and unavoidable. The

applicant sent an email to Eric Lardy at the County on July 24, 2020, requesting a meeting to discuss the County comments regarding impacts and mitigation measures.

More specifically, the County discusses the impact to the road segment of Riverford Road and the interchange of SR-67. Mitigation measures to improve Riverford Road are provided in the EIR, as well as mitigation to signalize the intersection of Riverford Road at the SR-67 Westbound Ramps. However, since these locations are within the County's and Caltrans' jurisdictions, the City is without jurisdiction to ensure the construction of the recommended improvements. Therefore, under CEQA, the impact is considered significant and unavoidable. The applicant sent an email to Eric Lardy at the County on July 24, 2020, requesting a meeting to discuss the County comments regarding impacts and mitigation measures.

The comment further states that the County is coordinating with private development stakeholders and Caltrans to improve Riverford Road from North Woodside Avenue to Woodside Avenue in the vicinity of the SR-67 interchange. An Intersection Control Evaluation Report was approved by Caltrans District 11 in January 2020, and a Project Initiation Document for the preliminary design of improvement alternatives including roundabouts is currently being implemented. The County is requesting a fair share from the proposed project to this improvement. The applicant sent an email to Eric Lardy at the County on

July 24, 2020, requesting a meeting to discuss the County comments regarding impacts and mitigation measures. No change to the EIR was made in response to this comment.

- L2-7:** The comment states that the proposed project and City should reconsider completing the Mast Boulevard connection between the City of Santee and County. The City agrees with the County’s observation that the EIR does not show a Mast Boulevard extension between Los Ranchitos Road to the County and notes the request for reconsideration by the Santee City Council. In October 2017, the City Council adopted Resolution No. 114-2017 approving an updated Circulation Element (Mobility Element). Two Mast Boulevard roadway segment options were considered, one extending Mast Boulevard to the City limit and one without the extension. These options were presented in the City Council Staff Report and analyzed in the Program Environmental Impact Report (SCH No. 2016121022). In their independent judgment, the City Council adopted the Mobility Element without the Mast Boulevard extension. Nothing precludes the City and the County from promoting non-vehicular forms of mobility in the future.
- L2-8:** This comment states that the proposed project should be revised until the traffic impacts are adequately mitigated. The most commonly applied tool to quantitatively reduce vehicle miles traveled (VMT) is the California Air Pollution Control Officers Association Quantifying

Greenhouse Gas Mitigation Measures, August 2010 handbook. The proposed project is in a “suburban context” per the California Air Pollution Control Officers Association. As such, the maximum VMT reduction from application of any and all appropriate VMT reduction measures is 15 percent. The proposed project exceeds the Citywide average VMT per capita threshold by, at most, 32 percent (under the land use plan without school). Therefore, it is infeasible for the proposed project to achieve a 32 percent VMT reduction using the VMT reduction measures from the published California Air Pollution Control Officers Association document. The proposed project can achieve a 13.7 percent reduction in VMT as shown in the EIR by applying several feasible VMT reduction measures, coming close to the maximum allowable 15 percent threshold. Given the explanation above, the appropriate VMT reduction measures were applied, the analysis in the EIR is adequate, and the correct conclusion of significance of not being fully mitigated was reached.

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**STORMWATER**

- L2-9 1. The Project could potentially generate stormwater impacts to adjacent 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 Best Management Practices (BMP) Design Manual as required by the San Diego Municipal Storm Water Permit Order No. R9-2013-0001.

**PARKS AND RECREATION**

- L2-10 1. The Department of Parks and Recreation (DPR) has observed existing use and unauthorized trail building in the area and on the land between the Project site and Sycamore Canyon/Goodan Ranch County Preserve to the north. Some of the land north of the Project site is privately owned and known to have sensitive resources in the Clark Canyon area. If the open space and trails within their Project site are not adequately managed and properly staffed, it could result in further negative impacts, and expansion of more unauthorized trails, which could contribute to more unauthorized uses at Sycamore Canyon/Goodan Ranch, private property to the north, and the MCAS Miramar property to the west.
- L2-11 2. There is limited information on how this proposed Project would manage the proposed open space and proposed trails system. Although a mitigation measure to require a Preserve Management Plan (BIO-1) would discuss these at a later time, additional management and maintenance information should be included in the condition and/or the draft EIR. DPR Resource Management respectfully requests to be a participant in the preparation and review of the Preserve Management Plan (BIO-1).
- L2-12 3. The draft EIR references existing uses in Section 4.10 Land Use & Planning, page 15, which does not go into details about how the open space land and trails within this development will be managed after Project completion. Without adequate management of their land and trails, the impacts on their land and the surrounding areas would be significant. This needs to be addressed in the environmental document.
- L2-13 4. Some of the proposed trails within the Project do not connect to formal trails. We suggest proposed trail connections to existing formalized trails or future connections be proposed to areas that may include trail connectivity in the future.
- L2-14 5. 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.
- L2-15 6. "Goodan Ranch," "Sycamore Canyon Preserve," and "Goodan Ranch/Sycamore Canyon Preserve" are not referenced correctly throughout the Bio Tech Report. Please update accordingly.
- a. Goodan Ranch is a jointly owned property and Sycamore Canyon Preserve is owned fully by County of San Diego, Department of Parks and Recreation. We recommend updating as necessary throughout the document.
- L2-16 7. Ensure the fire plan in place will provide mechanisms to keep fire from spreading into the Sycamore Canyon Goodan Ranch Preserve.

**L2-9:** This comment states that the proposed project could generate stormwater impacts to adjacent parcels in the unincorporated County of San Diego and should implement the San Diego Municipal Stormwater Permit Order No. R9-2013-0001. The Stormwater Quality Management Plan was prepared for Vesting Tentative Map for Fanita Ranch Permit Application Numbers GPA2017-2/TM 2017-3 per the requirements of the San Diego Municipal Stormwater Permit Order No. R9-2013-0001.

As a Priority Development Project, the proposed project would implement site design, source control, pollutant control, and hydromodification measures in accordance with the City's Best Management Practice Design Manual dated February 2016 in compliance with the San Diego Municipal Stormwater Permit Order No. R9-2013-000 as amended per Orders R9-2015-0001 and R9-2015-0100.

**L2-10:** The comment states that there is existing use and unauthorized trail building in the area between the project site and Goodan Ranch/Sycamore Canyon County Preserve, and if the open space and trails "within their Project site" are not managed adequately, additional impacts could occur off site. Neither the applicant nor the City is responsible for managing open space and trails outside of their ownership or jurisdiction, respectively. However, the applicant is committed to managing the open space and trails on the project site. Section 3.3.4, Habitat Preserve, addresses the

on-site Habitat Preserve and recognizes the off-road vehicular traffic that is detrimental to sensitive habitats in the Habitat Preserve. This section of the EIR describes how the Habitat Preserve would be owned, conserved, and managed in the future through a Preserve Management Plan (see Mitigation Measure BIO-1 and Appendix P to the Biological Resources Technical Report [Appendix D]). Section 3.4.1.3, Alternative Transportation Network, describes the trail system and states, “Post and rail or cable and post fencing would be used where appropriate for user safety and the protection of surrounding habitat.” Mitigation Measure BIO-2 states, “Covenants, conditions and restrictions shall include a notice describing the trail and preserve restrictions.” Mitigation Measure BIO-22 contains specific measures that restrict use of trails on site and states that trails will be managed in accordance with the Public Access Plan (see Appendix T to the Biological Resources Technical Report [Appendix D]). This issue is adequately addressed in the EIR.

- L2-11:** The comment states that there is limited information on how the Habitat Preserve and the trails in the Habitat Preserve would be managed. The comment states that a Preserve Management Plan, required in Mitigation Measure BIO-1, needs to be included in the EIR and the County’s Department of Parks and Recreation (DPR) is requesting to be a participant in the preparation and review of the Preserve Management Plan. The Preserve Management Plan was

made publicly available with the Draft EIR. Please see the Preserve Management Plan (Appendix P of the Biological Resources Technical Report [Appendix D]) for details on the management of the Habitat Preserve, and the Public Access Plan (Appendix T to the Biological Resources Technical Report [Appendix D]) for details on the management of trails in the Habitat Preserve. Regarding the request by DPR to be a participant in the Preserve Management Plan, the applicant and the City appreciate the request and acknowledge that the County is an interested stakeholder in the implementation of the Preserve Management Plan and Public Access Plan.

- L2-12:** This comment states that the EIR does not go into detail about how the open space land and trails in the proposed project will be managed after project completion. Chapter 3, Project Description, specifically Section 3.3.3.1.8, Open Space, describes how the areas designated as Open Space would be owned, maintained, and managed by the homeowners association. Section 4.3, Biological Resources, specifically Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, describes how trails will be managed in accordance with the Public Access Plan (Appendix T to the Biological Resources Technical Report [Appendix D]), and disclosed in the covenants, codes, and restrictions. Based on the opinion of the biological experts who prepared the analysis, the EIR describes the potential direct and indirect impacts, recommends mitigation, and

concludes that the impacts are less than significant with mitigation. This issue is adequately addressed in the EIR.

- L2-13:** The comment states that some of the trails on the project site do not connect to formal trails. The trail system was designed such that a route may be plotted from any point in the proposed project's internal trail system to link a hiker or biker to the following "formal" trails: the San Diego River Trail, which connects to Mission Trails Regional Park; the Stowe Trail, which connects northerly to Goodan Ranch via Marine Corps Air Station Miramar to the West Boundary Trail, the "unpaved service road," the Martha's Grove Trail, and the Ridge Trail; and a northeasterly proposed project trail that connects to the Sycamore Canyon County Preserve via the Slaughter House Canyon Trail. These northerly extending trails ultimately allow connection to the Trans County Trail. In addition, the proposed project has multiple connections to the San Diego River Trail and ultimately Mission Trails Regional Park. One such route, mentioned above, is via the Stowe Trail, which connects to the Weston development through Marine Corps Air Station Miramar and the East Eliot expansion area of Mission Trails Regional Park. It also can be accessed by the proposed multi-purpose trail in Fanita Parkway that connects to Mast Boulevard and then westerly to Mission Trails Regional Park. In addition, the San Diego River Trail would be accessible via a proposed multi-purpose trail and Cuyamaca Street to the San Diego River Trail and ultimately to Mission Trails



Regional Park. These trail connections are illustrated in the proposed project's Public Access Plan (Appendix T to the Biological Resources Technical Report [Appendix D]).

- L2-14:** The comment requests information on operations and maintenance for the parks, trails, and recreational facilities, including access control to ensure protection of the Habitat Preserve and adjacent Sycamore Canyon County Preserve. With respect to parks and other recreational facilities, maintenance will be required as a condition of project approval. With respect to access control measures, please refer to response to comment L2-10, which addresses the same issue raised in this comment.
- L2-15:** This comment states that “Goodan Ranch,” “Sycamore Canyon Preserve,” and “Goodan Ranch/Sycamore Canyon Preserve” are not referenced correctly throughout the Biological Resources Technical Report (Appendix D) and should be updated accordingly. The DPR website jointly refers to Goodan Ranch/Sycamore Canyon County Preserve. Because this does not change any conclusions to the proposed project's EIR, the reference to the “Goodan Ranch/Sycamore Canyon County Preserve” will remain unchanged.
- L2-16:** The comment requests assurance that the fire plan will provide mechanisms to keep fire from spreading into the Goodan Ranch/Sycamore Canyon County Preserve. The Fire Protection Plan (Appendix P1) provides details

regarding the on-site and perimeter fuel modification buffers that are provided as a protection for the proposed project's structures but that also provide a buffer between accidental on-site ignitions spreading to off-site open space areas. The fire protection system, including structural ignition resistance, access, landscape, fire response, water availability, and others, that combines to minimize the potential for a wildland fire to transition into an urban fire also works to minimize on-site fire transitioning into off-site areas. The additional residents at the proposed project would result in a significant monitoring system resulting in a network of persons who would provide fast vegetation ignition detection and reporting, enabling a fast response from the on-site fire station. Similarly, each home is fitted with interior sprinklers, which have a proven track record of performing at a high level for extinguishing or controlling internal fires to the room of origin. This helps minimize the potential for airborne embers from a fully engulfed home, which could ignite downwind vegetation. Fast response by the on-site fire station would also provide an additional layer of protection for the Goodan Ranch/Sycamore Canyon County Preserve. Please refer to Thematic Responses – Fire Protection and Safety and Fire Ignition and Risk for additional discussion regarding the site's fire protection and considerations for minimizing vegetation ignitions.

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L2-17 8. The Project needs to provide adequate discussion on potential indirect effects to the Sycamore Canyon Goodan Ranch Preserve.

L2-18 9. BIO-9: "Habitat Preserve Protection. In order to protect against incursions by domestic pets, children, or recreationists, brush management zones, temporary impact zones between roadways, manufactured slopes in development areas, and open space shall be planted with cactus species, poison oak, stinging nettle, and redberry buckthorn as appropriate. Cactus shall be planted so that it does not hinder fire access but shall be clustered so that it discourages or inhibits encroachment. An added benefit is that these areas eventually could support coastal cactus wren. Suitable areas, acreages, and methods are addressed in the Preserve Management Plan."

a. Please address potential indirect effects for Sycamore Canyon Goodan Ranch Preserve. How will incursion by domestic pets into open space, including the Preserve, be addressed? We ask, as planting of the aforementioned species wouldn't necessarily deter domestic pets from entering biological open space.

L2-19 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](mailto:timothy.vertino@sdcounty.ca.gov).

Sincerely,



Eric Lardy, AICP  
Chief, Advance Planning Division  
Planning & Development Services

Enclosures:

Attachment A: Previous COSD Comment Letter

cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2  
Nicole Boghossian, CAO Staff Officer, LUEG  
Sue Waters, Land Use/Environmental Planner, DPW  
Emmet Aquino, Park Project Manager, DPR  
Chelsea Oakes, Land Use/Environmental Planning Manager, PDS  
Jacob Armstrong, Chief, Land Development Division, PDS

**L2-17:** This comment states the proposed project needs to provide adequate discussion on potential indirect effects to the Goodan Ranch/Sycamore Canyon County Preserve. Section 4.15.5.1, Threshold 1: Deterioration of Parks and Recreational Facilities, in Section 4.15, Recreation, discusses the proposed trail connections to the existing Goodan Ranch/Sycamore Canyon County Preserve. In addition, Sections 4.3.5.1 and 4.3.5.2 in Section 4.3, Biological Resources, analyze the potential indirect impacts to sensitive plants, wildlife, and habitats and edge effects associated with the proposed project. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the proposed project would not result in significant indirect impacts to sensitive biological resources with mitigation incorporated. This issue is adequately addressed in the EIR.

**L2-18:** This comment requests that potential indirect effects for Goodan Ranch/Sycamore Canyon County Preserve be addressed. This comment asks how incursions by domestic pets into open space, including the preserve, will be addressed. Indirect impacts of the proposed project to biological resources, including sensitive plants and animals, are addressed in Section 4.3.5, Project Impacts and Mitigation Measures. Regarding domestic pets, Section 4.2.4, Predator/Pest Control, of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D])

includes management strategies conducted by the Habitat Preserve Manager for domestic animal control in the Habitat Preserve, thereby reducing impacts from free-roaming dogs and cats on the biological resources in the Habitat Preserve. Further, activities occurring in the Goodan Ranch/Sycamore Canyon County Preserve would continue to be consistent with and adhere to the regulations set forth by the DPR.

**L2-19:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter L3: Padre Dam Municipal Water District, July 13, 2020



July 13, 2020

City of Santee  
 Attn: Chris Jacobs, Principal Planner  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071  
[cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

**SUBJECT: Fanita Ranch Project – Draft Revised EIR**

Dear Mr. Jacobs,

L3-1

Thank you for the opportunity to review and comment on the Draft Revised Environmental Impact Report (EIR) for the Fanita Ranch Project (Project) dated May 29, 2020. The proposed Project area is located within Padre Dam Municipal Water District’s (Padre Dam) Western Service Area where we provide quality water, recycled water, park and recreational facilities, and wastewater management services for our customers in the City of Santee and parts of El Cajon and Lakeside. As the public agency that will serve the Project, Padre Dam has reviewed the Draft Revised EIR and offers the following comments.

**1. Water Conservation**

*Section 1.0 Executive Summary, Table 1-1 (page 1-52)*  
*Section 4.7.5 Project Impacts and Mitigation Measures, Mitigation GHG-3 (page 4.7-25)*

L3-2

Padre Dam appreciates that the Project will implement water conservation strategies that are designed to be as efficient as possible with potable water supplies. Padre Dam has already applied water conservation considerations in the 2015 Comprehensive Facilities Master Plan (CFMP) and 2015 Urban Water Management Plan (UWMP). Padre Dam requests clarification that any amount of water reduction targets are consistent with the most recently approved Padre Dam CFMP and UWMP. Furthermore, Padre Dam requests confirmation that the proposed development will comply with the current regulations regarding water usage and conservation provided by the State of California that would be implemented through Padre Dam.

L3-3

Additionally, required reduction in water consumption should also be consistent with the District studies provided in Appendix 01 – Water Service Study and Appendix 02 – Sewer Service Study.

BOARD OF DIRECTORS Douglas S. Wilson Augie Scalzitti Bill Pommering August A. Cairnes James Peasley	9300 Fanita Parkway Santee, CA 92071 T 619 448 3111 F 619 448 9459 www.padredam.org PO Box 719003 Santee, CA 92072-9003
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**L3**

**L3-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L3-2:** This comment states that the Padre Dam Municipal Water District (PDMWD) appreciates the proposed project water conservation strategies but wants clarification that the water reduction targets are consistent with the PDMWD 2015 Comprehensive Facilities Master Plan (CFMP) and 2015 Urban Water Master Plan (UWMP). The comment also requests confirmation that the proposed project will comply with current regulations regarding water usage and conservation.

The water conservation strategies for the proposed project are consistent with PDMWD’s current CFMP and UWMP. Note that Mitigation Measure GHG-3, Water Conservation, states that the proposed project would have a 20 percent reduction compared to the average water consumption rates in the City of Santee (City). This mitigation did not anticipate the proposed project would achieve a 20 percent reduction from PDMWD’s UWMP values. Instead, the greenhouse gas (GHG) modeling assumed a 20 percent reduction

compared to the average statewide water consumption rates. To ensure that the measure is clear and that it complied with PDMWD's current planning documents, Mitigation Measure GHG-3 has been revised as follows in Section 4.7, Greenhouse Gas Emissions, and the Greenhouse Gas Analysis (Appendix H).

Prior to issuance of building permits, the applicant or its designee shall provide evidence to the City of Santee that the proposed project will implement water conservation strategies that are designed to be as efficient as possible with potable water supplies and will achieve at least 20 percent indoor and outdoor water reduction compared to the average statewide water consumption rate ~~in the City of Santee~~ at the time of project approval.

This modification in the language clarifies the percent reduction, which also provides clarification that the proposed project water conservation is consistent with PDMWD's 2015 UWMP and ensures water flows associated with the proposed project are consistent with PDMWD's CFMP.

- L3-3:** This comment requests that the required water conservation reductions for the proposed project are consistent with the Water Service Study and Sewer Service Study (Appendices O1 and O2, respectively). Note that the proposed project water conservation

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L3-4	<p><b>2. Construction Traffic at Fanita Parkway</b>  <i>Section 1.0 Executive Summary, Table 1-1, Mitigation NOI-2 (page 1-57)</i>  <i>Section 1.0 Executive Summary, Table 1-1, Mitigation TRA-1 (page 1-64 through 1-66)</i>  <i>Section 4.12.5.1 Threshold 1: Exceedance of Noise Standards (page 4.12-25)</i></p> <p><i>"During building construction activities, all trucks shall access the site via Fanita Parkway and Cuyamaca Street only. Additionally, medium- and heavy-duty truck trips shall be limited on Fanita Parkway."</i>                      – Mitigation NOI-2: Vendor Trip Route Limitations (page 1-57)</p> <p><i>"...vendor trip limitations shall be imposed, which would prohibit vendor truck trips on Cuyamaca Street and Magnolia Avenue and require all truck traffic to use Fanita Parkway for site access."</i>                      – Mitigation TRA-1: Construction Traffic Control Plans (page 1-66)</p> <p><i>"...construction traffic is anticipated to primarily access the site from Fanita Parkway."</i>                      – Section 4.12.5.1 (page 4.12-25)</p> <p>Padre Dam requests that the Final Revised EIR revise Mitigation TRA-1 and Section 4.12.5.1 to be consistent with Mitigation NOI-2, which describes limited truck trips on Fanita Parkway and which also describes the use of Cuyamaca Street for site access.</p>
L3-5	<p>Furthermore, Padre Dam requests that the Final EIR and/or Project approval documents clarify that, depending on the timing of the Fanita Ranch Project, the contractor shall coordinate with the contractor(s) for the East County Advanced Water Purification (ECAWP) Project to minimize cumulative traffic impacts along Fanita Parkway. The ECAWP Project would include installation of a 24-inch welded steel water pipeline, as well as a 30-inch sewer forcemain. The ECAWP Project sites necessitate the use of Fanita Parkway and consideration regarding vehicular access for and during construction should account for this.</p>
L3-6	<p><b>3. Fire Flow Criteria</b>  <i>Section 3.4.2.1 Potable Water System (page 3-49)</i>  <i>Section 4.14.5.1 Threshold 1: Fire Protection Facilities (page 4.14-10)</i>  <i>Appendix O1. Water Service Study, Table 4-1 (page 4-1)</i></p> <p><i>"The water system for the proposed project would be designed to provide a minimum 2,500 gallons per minute for 2 hours of fire flow with fire hydrants spaced on average every 300 feet."</i></p> <p>Padre Dam requests confirmation that this Section is consistent with Appendix O1. Water Service Study.</p>
L3-7	<p><b>4. Recycled Water Availability</b>  <i>Section 3.4.2.2 Recycled Water System/Advanced Treated Water (page 3-50)</i></p> <p><i>"...PDMWD will not pursue expansion of their permanent recycled water system to serve the proposed project or other future developments in the district."</i></p>

commitments are consistent with the Water Service Study and Sewer Service Study (Appendices O1 and O2, respectively). The 20 percent reduction in water consumption was compared with statewide average water consumption, which was cleared up in the revised text of Mitigation Measure GHG-3 shown in response to comment L3-2.

**L3-4:** This comment requests that Mitigation Measure TRA-1 in Section 4.16.5.1, Threshold 1: Circulation System Performance, be revised to be consistent with Mitigation Measure NOI-2 in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards. The suggested change has been implemented to the final requirement of Mitigation Measure TRA-1 in the EIR and Traffic Impact Analysis (Appendix N) as follows:

- In addition, vendor trip limitations shall be imposed, which would prohibit vendor truck trips on ~~Cuyamaca Street~~ and Magnolia Avenue and require all truck traffic to use Fanita Parkway or Cuyamaca Street for site access. Additionally, medium- and heavy-duty truck trips shall be limited on Fanita Parkway. Truck trips shall be limited to 170 one-way trips (85 two-way trips) on Fanita Parkway during Phase 1 building construction activities and to a maximum of 140 one-way trips (70 two-way trips) on Fanita Parkway during simultaneous

building construction activities and project operation.

Worker vehicle trips would be allowed on all roadways.

Section 4.16.5.1 concludes that adequate capacity is available on existing streets to serve construction traffic without mitigation. The modification to Mitigation Measure TRA-1 does not result in any change to the conclusion that the identified construction traffic management plan would reduce impacts to a less than significant level.

In addition, the reference to Fanita Parkway as the primary access for the site during construction has been revised in Section 4.12.5.1 for clarity as follows:

This represents a worst-case scenario for ~~Cuyamaca Street and Magnolia Avenue~~ because construction traffic is anticipated to primarily access the site from ~~Fanita Parkway~~ all roadways.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

- L3-5:** This comment requests specific consideration of cumulative impacts from the East County Advanced Water Purification (ECAWP) Project related to impacts to Fanita Parkway during construction. Cumulative projects, including the ECAWP Project, were included in the analysis of the Near Term + Interim Operation + Construction Scenario in Section 4.12.5.1, Threshold 1: Exceedance of Noise



Standards. Cumulative traffic volumes are consistent with the traffic volumes provided in the Transportation Impact Analysis for the Near Term (cumulative) scenario (Appendix N). Construction vehicle noise modeling assumes an increase in truck trips during construction (see Appendix L). A vehicle mix of 6–7 percent trucks was assumed for Fanita Parkway during construction compared to 4 percent during normal conditions. Therefore, the analysis of impacts to Fanita Parkway during construction takes into account cumulative projects, including an increase in truck traffic volume. Mitigation Measures NOI-2 and TRA-1 have been identified to mitigate the proposed project’s potentially significant contribution to construction traffic noise on Fanita Parkway and construction truck trips, respectively. Similarly, Mitigation Measure Tra-1 identified in the Final Initial Study/Mitigated Negative Declaration (IS/MND) for the ECAWP Project (SCH No. 2018091029) requires implementation of a Traffic Management Plan to reduce construction traffic impacts from the ECAWP project to a less than significant level. The applicant will coordinate with PDMWD during construction. No changes to the EIR have been made in response to this comment.

- L3-6:** This comment requests confirmation of consistency between Sections 3.4.2.1 and 4.14.5.1 and Appendix O1, Water Service Study, regarding fire flow requirements. For clarification, the statement provided in Sections 3.4.2.1,

4.14.5.1, 4.17.5.1, and 4.18.5.2 has been revised to be consistent with Appendix O1:

The water system for the proposed project would be designed to provide a minimum 2,500 gallons per minute for ~~2~~ 3 hours of fire flow for single-family and multi-family residential and 3,500 gallons per minute for 4 hours of fire flow for commercial areas with fire hydrants spaced on average every 300 feet.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-7:** This comment requests revisions to the discussion of PDMWD's recycled water program. The City agrees with PDMWD's request to add additional clarifying language to the EIR, although the clarification does not pertain to the proposed project. Section 3.4.2.2 has been revised for clarity as follows:

PDMWD may provide recycled water to the proposed project for construction purposes on a limited and seasonal basis, but PDMWD will not pursue expansion of their permanent recycled water system to serve the proposed project or other future developments in the district. PDMWD will continue to provide recycled water to existing and future customers in the existing Gravity Zone for recycled water.

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L3-7  
cont.

Padre Dam requests that the Final Revised EIR clarify that Padre Dam will continue recycled water deliveries to *existing and future customers* in the existing Gravity Zone for recycled water. While recycled water used for construction of the Project will be available on a limited and seasonal basis, the use of recycled water for the Project would require treatment plant expansion and an additional pressure zone with a pump station and reservoir specific only to Fanita Ranch. Considering the ECAWP Project that is currently in the project procurement and permitting phase (construction is estimated to be completed in 2025), Padre Dam determined that the additional infrastructure and requirements to deliver recycled water to Fanita Ranch would not be the best and most efficient use of wastewater recycling resources. The ECAWP Project will improve local and regional drinking water reliability by maximizing the use of available East County wastewater flows to create a new source of local, reliable, and drought-proof potable water with consistent year-round usage, reducing reliance on imported water.

Thus, while Padre Dam may provide recycled water to the Project for construction purposes on a limited and seasonal basis, Padre Dam will not pursue expansion of its existing recycled water system to serve the Project.

5. **Sanitary Sewer System**

Section 3.4.2.3 Sanitary Sewer System (page 3-50)

Section 4.17.5.1 Threshold 1: New or Expanded Utilities or Service Systems (page 4.17-17)

L3-8

*"The proposed project would construct the new headworks facility to provide pretreatment for the sanitary flow."*

Padre Dam requests that the Final Revised EIR clarify that the proposed sewer headworks facility is not currently located on Padre Dam property but instead will be located on property granted to Padre Dam by the Project applicant.

L3-9

The Final Revised EIR should further clarify that Padre Dam's existing Ray Stoyer Water Recycling Facility (WRF) does not have adequate capacity alone to serve the sewer demand generated by the Project, as stated in this Section. A combination of the WRF and the available capacity in the San Diego Metropolitan Sewerage System (Metro) provides sufficient capacity to serve the Project.

6. **Cumulative Impacts with the East County Advanced Water Purification (ECAWP) Project**

Section 4.0 Environmental Impact Analysis, Table 4-2 (pages 4-6 through 4-8)

Section 4.12.6.1 Cumulative Threshold 1: Exceedance of Noise Standards (page 4.12-79)

L3-10

Padre Dam requests clarification as to whether the ECAWP Project is considered in the Draft Revised EIR's cumulative impacts analysis.

7. **Existing Conditional Use Permit**

Section 4.2 (pages 4.2-7 through 4.2-8, and 4.2-42)

L3-11

Padre Dam requests that the Final Revised EIR clarify that while there is an existing Conditional Use Permit (CUP) from the City of Santee for the existing Ray Stoyer Water Recycling Facility (WRF), a portion of the ECAWP Project would include changes to the existing WRF. The required

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-8:** This comment requests clarification regarding the location of the new headworks facility discussed in Sections 3.4.2.3 and 4.17.5.1. The City agrees with this request, and Section 3.4.2.3 has been revised for clarification as follows:

The proposed project would construct the new headworks facility on property granted to PDMWD by the project applicant to provide pretreatment for the sanitary flow.

Section 4.17.5.1, the following language has been clarified:

Connection to the WRF would be provided by gravity but would require the construction of a new headworks facility, on property granted to PDMWD by the project applicant, to provide screening and grit removal for the proposed project's sanitary flow.

These revisions are for clarification purposes, and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-9:** This comment requests clarification that PDMWD's existing Ray Stoyer Water Recycling Facility (WRF) does not have adequate capacity alone to serve the sewer demand generated by the proposed project. A combination of the

WRF and the available capacity in the San Diego Metropolitan Sewerage System (Metro) would provide sufficient capacity to serve the proposed project. The City agrees with this request, and the following statement has been added to the EIR in Sections 3.4.2.3 and 4.17.5.1:

It should be noted that PDMWD's existing Ray Stoyer WRF does not have adequate capacity alone to serve the sewer demand generated by the proposed project. A combination of the WRF and the available capacity in the San Diego Metropolitan Sewerage System (Metro) would provide sufficient capacity to serve the proposed project.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

- L3-10:** This comment requests clarification as to whether the ECAWP Project was considered in the EIR's cumulative impacts analyses. The project was included as part of cumulative project 31 in Table 4-2, Cumulative Projects, in Chapter 4, Environmental Impact Analysis. This cumulative project is the buildout of the PDMWD Master Plan, including the Santee Lakes Recreation Preserve Expansion, the ECAWP Project, and other Master Plan projects. For clarification, the following revisions have been made to Table 4-2:

**Excerpt from Table 4-2. Cumulative Projects**

31	Padre Dam Municipal Water District Master Plan projects including Santee Lakes Recreation Preserve Expansion and ECAWP Project	<u>Operational trips related to the Buildout of Master Plan improvements including construction and operational trips</u>	Under Construction (Santee Lakes Recreation Preserve Expansion) Approved in 2019 and construction anticipated to begin 2022 (ECAWP Project)
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These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

- L3-11:** This comment requests that Section 4.2, Air Quality, be clarified regarding the existing Conditional Use Permit (CUP) from the City for the existing Ray Stoyer WRF and the future CUP that would be required once the ECAWP Project is completed. The City understands that the existing CUP would be replaced by the new CUP because the ECAWP Project would require replacement and upsizing of the WRF. The Final Initial Study/Mitigated Negative Declaration (IS/MND) for the ECAWP Project (SCH No. 2018091029) describes the ECAWP Project’s required odor control measures. Under CEQA, the EIR must rely on the current permits in effect at the time the EIR is prepared and approved. The City acknowledges that when the ECAWP

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measures discussed in this Section are in reference to the CUP for the existing WRF, while the ECAWP Final Initial Study/Mitigated Negative Declaration describes the ECAWP Project's environmental mitigation measures.

Padre Dam, the San Diego County Sanitation District, the City of El Cajon, and Helix Water District are collaborating on the ECAWP Project. Padre Dam, El Cajon, and the County recently established the East County Advanced Water Purification Joint Powers Authority (JPA), created as a separate local agency pursuant to the Joint Exercise of Powers Act (Government Code, § 6500 *et seq.*). The purpose of the JPA is to finance, construct, and operate wastewater treatment and advanced water purification facilities in East County. Because the changes to the existing WRF would be made by the JPA, and not Padre Dam, the requirements in the existing CUP will not apply to the changed WRF facilities. However, as explained below, odor control measures would continue to be implemented.

In 2017, the District certified a Program Environmental Impact Report for its Comprehensive Facilities Master Plan (CFMP or Master Plan) (SCH 2015#111014). The Program EIR addressed the potential physical environmental impacts that would result from implementation of the proposed Master Plan projects, including the ECAWP Project. As part of the ECAWP Project, the existing WRF would be decommissioned and replaced with a new, larger WRF located south of the existing WRF generally in the area of Pond A. As further explained in the ECAWP Project Final Initial Study/Mitigated Negative Declaration (SCH# 2018091029) adopted by Padre Dam in December 2018 and by the JPA Board on February 20, 2020, which tiers from the Program EIR for the Master Plan, there would be less than significant impacts related to odors due to project design features and conformance with San Diego Air Pollution Control District Rule 51. Thus, although the existing CUP would no longer be in effect for the decommissioned WRF facilities, odor control measures would continue to be implemented.

To the extent that the ECAWP Project does not move forward, Padre Dam will continue to coordinate with the City of Santee regarding the existing CUP.

**8. Residential Water Demand**

*Section 4.7.4 Method of Analysis, Table 4.7-6, PDF-UT-4 Residential Landscaping (page 4.7-18) Appendix O1. Water Service Study, Table 3-2 (page 3-6)*

*"With an estimated total water use of 500 gpd per home..."*

Padre Dam recommends that this statement be revised to be consistent with the proposed residential water demand from Appendix O1. Water Service Study. The study proposes 340 gallons per day (gpd) per dwelling unit for single family residential land use.

**9. Sanitary Sewer Flow**

*Section 4.8.1.3 Padre Dam Municipal Water District Wastewater Treatment Plant (page 4.8-5) Appendix O2. Sewer Service Study, Section 3.1 (page 3-1)*

*"Of the 5.2 million gallons of wastewater managed by PDMWD per day, 40 percent (approximately 2.1 million gallons) is diverted to the PDMWD Ray Stoyer WRF for treatment."*

L3-11  
cont.

L3-12

L3-13

Project is completed, a new CUP would take effect, and the necessary odor control measures would be implemented at that time. No changes to the EIR have been made in response to this comment.

**L3-12:** This comment requests clarification to the total water use per home in PDF-UT-4 in Table 4.7-6, Project Design Features, to be consistent with Appendix O1, Water Service Study. The City agrees with this request. The following statement has been revised in EIR Table 4.7-6 and Table I in Appendix H, Greenhouse Gas Analysis, to be consistent with Appendix O1:

With an estimated total water use of ~~500~~ 340 gpd per home and . . .

This revision does not change the reduction calculations from water conservation because the GHG reduction was calculated based on a 20 percent reduction compared to the statewide water consumption. Therefore, these revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-13:** This comment requests revisions to the discussion of the PDMWD WRF treatment capacity in Section 4.8.1.3, Hazards and Hazardous Materials, Padre Dam Municipal Water District Wastewater Treatment Plant, to be consistent with Appendix O2, Sewer Service Study. The

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L3-13  
cont.

Padre Dam recommends that this Section be revised such that the numbers provided throughout this Section are consistent with Appendix O2, Sewer Service Study. The study indicates that the Average Dry Weather Flow (ADWF) is 4.43 MGD, of which up to 2.0 MGD is treated at the WRF.

**10. Ground Water**

Section 4.9.5.2 Threshold 2: Ground Water Supplies (page 4.9-21 through 4.9-22)  
Appendix O3. Water Supply Assessment, Section 5.3.2 Future Supplies (page 5-12)

This Section is regarding groundwater and does not need to address the ECAWP Project. Consider using the following text:

L3-14

*"No groundwater would be used for Project construction or operation activities. Therefore, the proposed Project would not adversely affect or deplete groundwater supplies due to water demand generated by the proposed development."*

Note that the proposed ECAWP Project would provide Advanced Treated Water to the entire District blended into the potable water system once the ECAWP Project is complete. The water that Fanita Ranch receives would include the blended supply provided to the entire District. This is detailed in Appendix O3. Water Supply Assessment.

**11. Pump Station Noise**

Section 4.12.5.1 Threshold 1: Exceedance of Noise Standards (page 4.12-51)

L3-15

Padre Dam suggests that the Final Revised EIR consider the noise impact of air compressors, motors, air bleed valves, and backup generators associated with the pump stations.

**12. Water Supply Availability**

Section 4.17.5.2 Threshold 2: Water Supply Availability (page 4.17-26)

L3-16

Consider the following revisions to the first paragraph on page 4.17-26. The language below is the correct description of the ECAWP Project:

*"The ECAWP Project, which is currently in the project procurement and permitting phase, is anticipated to treat the combined 2025 wastewater flow of approximately 15 million gallons per day (MGD) and produce up to 12,880 acre-feet per year (AFY), or 11.5 MGD, of new, reliable, and locally controlled potable water supply which represents approximately 30% of East County San Diego's water demand, expected to produce up to 11.5 mgd to be pumped into Lake Jennings for surface water augmentation, created from 15 mgd recycled water from the upgrade of the Ray Stoyer WRF by the end of 2025. If the ECAWP Project is implemented, based on this projected time frame, the proposed project would utilize be able to fully use purified water from the ECAWP Project Program within the 20-year water supply planning horizon and beyond. However, the this program ECAWP Project is would not be necessary for PDMWD to meet the demand associated with the proposed project but could provide an additional supply source for further water supply security to the proposed project and other PDMWD customers if it is implemented. Further, PDMWD plans to reduce its dependence on imported supplies from the SDCWA by continuing permanent water conservation efforts."*

City agrees with this request, and the statement in Section 4.8.1.3 has been revised to state the following:

Of the ~~5.2~~ 4.43 million gallons of wastewater managed by PDMWD per day, ~~450~~ percent (approximately ~~2.04~~ million gallons) is diverted to the PDMWD Ray Stoyer WRF for treatment.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-14:** This comment requests revisions to Section 4.9.5.2, Threshold 2: Ground Water Supplies, to delete the reference to the ECAWP Project. The City agrees with this request. Section 4.9.5.2 has been revised for clarity as follows:

~~The project site would receive Advanced Treated Water from Padre Dam Municipal Water District through its Advanced Water Purification Program, which would provide the proposed project with a local, reliable, and sustainable water supply. No groundwater would be used for project construction or operation activities. Therefore, the proposed project would not adversely affect or deplete groundwater supplies due to water demand generated by the proposed development.~~

**L3-15:** This comment suggests that the EIR consider the noise impact of air compressors, motors, air bleed valves, and backup generators associated with the pump stations. Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, did address typical equipment associated with pump stations, which includes air compressors, motors, air bleed valves, and back-up generators. To further clarify this in the text, the discussion of on-site water infrastructure has been modified as follows to specifically reference the listed equipment:

Following construction, proposed underground pipelines and aboveground storage tanks would be passive and would not generate operational noise. However, two pump stations are proposed to provide potable water to the project site. Noise sources at typical pump stations include air compressors, motors, air bleed valves, and backup generators.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-16:** This comment requests clarifications to the description of the ECAWP Project in Section 4.17.5.2, Threshold 2: Water Supply Availability. While not required under CEQA, the City agrees to make the suggested clarifications to Section 4.17.5.2 as follows:



The ECAWP ~~Program~~ Project, which is currently in the project procurement and permitting phase, is anticipated to treat the combined 2025 wastewater flow of approximately 15 million gallons per day (MGD) and produce up to 12,880 acre-feet per year (AFY), or 11.5 MGD, of new, reliable, and locally controlled potable water supply which represents approximately 30% of East County San Diego's water demand. ~~expected to produce up to 11.5 mgd to be pumped into Lake Jennings for surface water augmentation, created from 15 mgd recycled water from the upgrade of the Ray Stoyer WRF by the end of 2025.~~ If the ECAWP Project ~~Program~~ is implemented, based on this projected time frame, the proposed project would utilize ~~be able to fully use purified~~ water from the ECAWP Project ~~Program~~ within the 20-year water supply planning horizon and beyond. However, the ~~this program~~ ECAWP Project ~~is~~ would not be necessary for PDMWD to meet the demand associated with the proposed project but could provide an additional supply source for further water supply security to the proposed project and other PDMWD customers if it is implemented. Further, PDMWD plans to reduce its dependence on imported supplies from the SDCWA by continuing permanent water conservation efforts.

July 13, 2020  
Page 6

L3-17

**13. Wastewater Treatment Capacity**

*Section 4.17.5.3 Threshold 3: Wastewater Treatment Capacity (page 4.17-26)*

Consider the following revisions to the last paragraph on page 4.17-26. The language below is the correct description of the proposed public wastewater treatment system:

*"As described in Section 4.17.5.1, the proposed project would construct new public sewer infrastructure that would be owned, operated, and maintained by PDMWD. Sewage generated on the project site would be treated at ~~two gravity discharge locations: the existing Ray Stoyer WRF or at the new Water Recycling Facility (WRF) to be constructed as part of the ECAWP Project. In instances where the WRF is offline for maintenance, capital improvement, etc., sewage generated on the project site would be diverted to the City of San Diego's Metropolitan Sewerage System."~~ through a new headworks facility or the Ray Stoyer WRF to the Metro system. PDMWD plans to expand the Ray Stoyer WRF to ultimately provide highly purified water to enhance PDMWD's water supply portfolio as part of the ECAWP Program.*

L3-18

Thank you for the opportunity to review and provide comments on the Draft Revised EIR. Padre Dam is available to meet on any of the comments provided above.

Please contact me at (619) 258-4766 or [mniemiec@padre.org](mailto:mniemiec@padre.org), if you have any questions.

PADRE DAM MUNICIPAL WATER DISTRICT



Mark Niemiec, P.E.  
Director of Engineering & Planning

MN:cc

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

**L3-17:** This comment requests clarifications to the description of the proposed public wastewater treatment system in Section 4.17.5.3, Threshold 3: Wastewater Treatment Capacity. The City agrees with this request. Section 4.17.5.3 has been clarified as follows:

As described in Section 4.17.5.1, the proposed project would construct new public sewer infrastructure that would be owned, operated, and maintained by PDMWD. Sewage generated on the project site would be treated at ~~two gravity discharge locations: the existing Ray Stoyer WRF or at the new WRF to be constructed as part of the ECAWP Project. In instances where the WRF is offline for maintenance, capital improvement, etc., sewage generated on the project site would be diverted to the City of San Diego's Metropolitan Sewerage System.~~ through a new headworks facility or the Ray Stoyer WRF to the Metro system. PDMWD plans to expand the Ray Stoyer WRF to ultimately provide highly purified water to enhance PDMWD's water supply portfolio as part of the ECAWP Program.

**L3-18:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter L4: San Diego Association of Governments, July 13, 2020



401 B Street, Suite 800  
San Diego, CA 92101-4231  
(619) 699-1900  
Fax (619) 699-1905  
sandag.org

July 13, 2020

Chris Jacobs  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

Dear Mr. Jacobs:

Subject: Fanita Ranch Draft Revised IFR

Thank you for the opportunity to comment on the City of Santee's Fanita Ranch Revised EIR. The San Diego Association of Governments (SANDAG) appreciates the City's efforts to implement the policies included in San Diego Forward: The Regional Plan that emphasize the need for better land use and transportation coordination. 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 based on policies included in the Regional Plan and are submitted from a regional perspective.

**Active Transportation**

Many of the transportation mitigation features include roadway widening and the addition of lanes. While this may address traffic congestion to some extent, it also has the potential to increase congestion due to induced demand. This would cause negative progress towards the City, Regional, and State Climate Change goals and general plans.

- It is suggested that more significant improvements for walking and biking be included as part of the mitigation strategy in order to encourage more people to choose to walk and bike.
- Consider providing access to transit giving residents more options for mobility which will result in lower VMT to conform to regional goals of GHD reduction and ensure consistency with SANDAG's regional Plan.
- The plan should include Class IV separated bikeways and sidewalks on both sides of lanes with more than one lane in each direction as mitigation.
- SANDAG appreciates the proposed traffic calming features, trails, and bike parking in this plan.

**SmartGrowth**

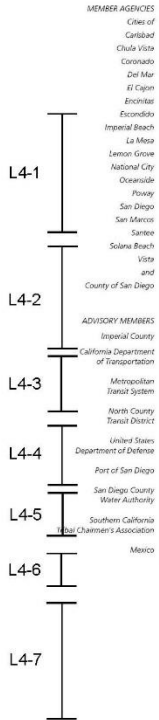
This project is not located in a Smart Growth Opportunity Area (SGOA) identified on the Smart Growth Concept Map. A key goal of the 2015 Regional Plan is to focus growth in SGOAs. Development in these areas supports a sustainable and healthy region, a vibrant economy, and an outstanding quality of life for all. Please facilitate access to any planned transit routes and services within the plan area.

**L4**

**L4-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**L4-2:** This comment states that an increase in traffic congestion has the potential to occur with induced demand and cause negative progress toward climate change goals and general plans. Given the nature of the additional traffic and the percentage of the traffic generated during peak hours, it was determined that the majority of the significant impacts would be most effectively mitigated with the addition of travel lanes. Mitigation on the “demand side” is also recommended in terms of a robust Transportation Demand Management (TDM) Plan.

**L4-3:** This comment includes a suggestion that more significant improvements for walking and biking be included in the mitigation strategy. As shown on Figures 3-9 and 3-10 in Chapter 3, Project Description, the proposed project includes pedestrian and bicycle amenities and extensive on- and off-site pedestrian and bicycle circulation systems. Discussions with local transit providers revealed that extending bus service into



the project site would not result in adequate ridership to be sustainable.

- L4-4:** This comment states that the project should consider providing access to transit. Please refer to response to comment L4-3, which addresses the same issue raised in this comment.
- L4-5:** This comment states that the plan should include Class IV separated bikeways and sidewalks on both sides of lanes with more than one lane in each direction as mitigation. Please refer to response to comment L4-3, which addresses the same issue raised in this comment.
- L4-6:** This comment states that SANDAG appreciates the proposed traffic calming features, trails, and bike parking in the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- L4-7:** This comment states that the proposed project is not in a Smart Growth Opportunity Area identified on the Smart Growth Concept Map. The comment also requests that access to any planned transit routes and services in the plan area be facilitated. Please refer to response to comment L4-4, which addresses the same issue raised in this comment.

L4-8  
L4-9  
L4-10

**Environmental**

- Biological mitigation is relying on completion of the City's MSCP Subarea Plan which is still in process. Will CEQA allow this? If not then project proponent will conduct Section 7 pursuant to permit with USACE or Section 10.
- Wildlife connectivity – make sure preserve design is consistent with MSCP General Preserve design criteria a. through e. In addition, was unclear if streets V and W will have wildlife undercrossing features or will be bridged? How does wildlife move through that corridor?

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

We appreciate the ability to comment on the City of San Diego's Trails at Carmel Mountain Ranch NOP. If you have any questions, please contact me at (619) 699-1943 or at [seth.litchney@sandag.org](mailto:seth.litchney@sandag.org).

Sincerely,

SETH LITCHNEY  
Senior Regional Planner SLU/TFE

**L4-8:** The comment questions if the biological mitigation is relying on the completion of the Draft Santee MSCP Subarea Plan, which is still in process, and further questions if the project will conduct Section 7 pursuant to permit with USACE or Section 10 if the Draft Santee MSCP Subarea Plan is not completed.

The proposed project's mitigation is not reliant on the completion of the Draft Santee MSCP Subarea Plan. The EIR provides mitigation to reduce impacts to less than significant in accordance with CEQA requirements. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is still used as the guidance document for projects occurring in the City. Therefore, the EIR is also consistent with the Draft Santee MSCP Subarea Plan, which would serve as an HCP pursuant to Section 10(a)(1)(B) of FESA and as an NCCP pursuant to the California NCCP Act of 1991. However, because the Draft Santee MSCP Subarea Plan is still a draft and is not complete, the EIR cannot rely upon the protections of the plan.

As stated in the comment, if the Draft Santee MSCP Subarea Plan is not approved, the project would seek take authorization through FESA Section 7 or an individual Section 10 permit; however, take authorization is not a CEQA issue. The EIR adequately identifies the proposed project impacts to biological

resources in Section 4.3, Biological Resources, and recommends mitigation measures that would reduce impacts to less than significant. With implementation of these mitigation measures, and regardless of the MSCP, Section 7, or Section 10 permitting process, impacts would be reduced to less than significant.

Please refer to Thematic Response – Santee MSCP Subarea Plan.

- L4-9:** The comment requests that the Habitat Preserve design specifically for wildlife connectivity to be consistent with the MSCP General Preserve design criteria a through e. The comment then asks if Streets “V” and “W” will have wildlife undercrossings.

In response to this request, the criteria listed in the MSCP General Preserve Design (referenced as “a through e” in the comment) (City of San Diego 1998) and how the proposed Habitat Preserve design is consistent with these criteria and to the NCCP/HCP conservation standard are as follows:

High biodiversity land 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);



**Response a** – The vegetation communities in the Habitat Preserve are ranked according to Figure 2-3 in the MSCP Plan (City of San Diego 1998) as Very High, High, and Moderate. It should be noted that the vast majority of the project site receives a Very High ranking.

Large blocks of unfragmented habitat, following natural topography (ridges and watersheds);

**Response b** – As stated in Section 4.3.7, Comparison of Proposed Project to 2007 Project, the majority of the Habitat Preserve is contained within an approximately 900-acre block of contiguous open space. The Habitat Preserve contains a variety of topographic features, including flat low lands containing vernal pools, grasslands, and wetlands, as well as canyon slopes and ridges containing coastal sage scrub and chaparral.

Large, interconnected blocks of habitat that contribute to the preservation of wide-ranging species;

**Response c** – The Habitat Preserve design process was informed by the wildlife movement field studies intended to ensure ease of movement for wide-ranging species, such as mule deer (*Odocoileus hemionus*), and would contain an approximately 900-acre block connected to other preserves within the vicinity (generally by 1,000 feet or more).

Key existing linkage areas between core habitat blocks; restore or enhance as necessary the connections to other private or public open space lands and to other subareas and/or habitat patches outside the subarea plan area;

**Response d** – The Habitat Preserve would maintain connectivity with open space areas on MCAS Miramar (to the west) and in the County (to the north and east), which are outside the Draft Santee MSCP Subarea Plan boundary. The Habitat Preserve would be included in the MHPA boundaries and be subject to in-perpetuity, adaptive management that would restore or enhance habitat as necessary according to Mitigation Measure BIO-1. See Thematic Response – Wildlife Movement and Habitat Connectivity.

(e) Configuration that minimizes edge effects between habitat preserves and development and edge-to-preserve area ratio.

**Response e** – As stated in Section 4.3.5.6, Threshold 6: Habitat Conservation Plan, the current project footprint has been reduced from the previous development hardline footprint identified in the approved 1998 MSCP Plan (City of San Diego 1998). A large development bubble in the southern portion of the site from the 1998 project design was removed, increasing the size of the current Habitat

Preserve by more than 200 acres. As result, edge effects were minimized by consolidating all of the development in two, rather than three, development bubbles and by providing edge treatments, such as wider brush management areas, to buffer development impacts from the Habitat Preserve. Additionally, Section 4.3.4, Method of Analysis, states that the project proposes to close off and revegetate a large proportion of the existing trails and to realign existing trails to minimize overlap of human and sensitive resources. Furthermore, the Habitat Preserve would be subject to in-perpetuity, adaptive management outlined in EIR Mitigation Measure BIO-1 and the Preserve Management Plan (Appendix P to EIR Appendix D, Biological Resources Technical Report). The Habitat Preserve management would reduce and prevent permanent edge effects caused by proximity to development, see the Preserve Management Plan (Appendix P to EIR Appendix D, Biological Resources Technical Report) for details.

In response to the second part of the comment, the wildlife crossings at Streets “V” and “W” will be at grade (i.e., there are no wildlife undercrossings or culverts on these Streets). If wildlife crossings were installed along Streets “V” and “W” the streets would have needed to be much wider than currently proposed

to accommodate the topography at those locations. Potential direct impacts to wildlife crossing the roadways would be mitigated by Mitigation Measure BIO-20 (Wildlife Protection) that incorporates features that would allow wildlife to cross the roadways more safely, including a 25 mile-per-hour speed limit, street signs, speed bumps, and other traffic-calming devices. Each of these features are included in the corridor design criteria to minimize impacts to wildlife movement in the Draft Santee MSCP Subarea Plan. Mitigation Measure BIO-22 (Wildlife Corridors) includes Measure 6, in which safety lighting for Streets “V” and “W” would be button started with a timer shut-off delay so that lighting is not on at night except for emergency purposes or pedestrian safety.

- L4-10:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter T1: Kumeyaay Heritage Preservation Council, June 10, 2020

**T1**

Subject: FW: Kumeyaay Heritage Preservation Council / Fanita Ranch

From: Tom Holm <tomholm@khpc.net>  
 Sent: Wednesday, June 10, 2020 10:39 AM  
 To: Chris Jacobs <Cjacobs@CityofSanteeCa.gov>  
 Subject: Kumeyaay Heritage Preservation Council / Fanita Ranch

June 10, 2020

Mr. Chris Jacobs [via email only to: Cjacobs@CityofSanteeCA.gov](mailto:Cjacobs@CityofSanteeCA.gov)  
 City of Santee  
 10601 Magnolia Avenue  
 Santee, CA 92071

**RE: Fanita Ranch Proposed Development**

Dear Mr. Jacobs

T1-1 I am writing to you in my capacity as Executive Director of the Kumeyaay Heritage Preservation Council ("KHPC"). KHPC is a sanctioned alliance comprising nine federally-recognized Kumeyaay governments working collectively to preserve the heritage, spirituality, and cultural resources of the Kumeyaay within their homelands. These lands include the entirety of San Diego County and the City of Santee.

T1-2 KHPC celebrates not only the lives, lifestyles, and customs of ancestors, but also the vibrant Kumeyaay communities which continue to thrive in Southern California and Northern Mexico. KHPC is authorized to employ appropriate policies and laws to preserve and rejuvenate indigenous heritage. To ensure these safeguards, we request your office permit us to preview plans for all construction in the City of Santee, including the proposed Fanita Ranch Development. Further, please enable KHPC to preview and monitor all approved land disturbances in Santee using personnel certified by our organization.

T1-3 Regarding the proposed Fanita Ranch development, I look forward to working with you to ensure this project remains compliant with CEQA and all additional preservation laws.

Thank you for your consideration. Please feel free to contact me anytime.

Respectfully and with kind regards,

Tom Holm, Executive Director  
 Kumeyaay Heritage Preservation Council  
 (An Alliance of Nine Federally-Recognized Kumeyaay Governments)  
 5663 Balboa Avenue, Suite 610  
 San Diego, CA 92111

**T1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T1-2:** This comment requests that the City of Santee (City) allow the Kumeyaay Heritage Preservation Council (KHPC) to preview plans for all construction in the City, including the proposed project. Further, this comment requests KHPC to be able to preview and monitor all approved land disturbances in the City using personnel certified by their organization. The City responded to this comment letter on June 11, 2020, stating the following: “The City of Santee has included your name on the notification list for future projects undergoing environmental review under the California Environmental Quality Act and the notice list maintained by the City pursuant to AB 52 (tribal cultural resources). If you wish to inspect confidential documents related to cultural resources for the Fanita Ranch Project, please fill out the attached form and send a representative to the City to review them in person. Alternatively, you can request copies of the confidential documents from the SCIC. Appointments can be made by contacting Chris Jacobs at 619-258-4100, ext 182 [orcjacobs@cityofsanteeca.gov](mailto:orcjacobs@cityofsanteeca.gov).”

The City attached the Fanita Ranch Confidential Documents Review Conditional Use agreement to this correspondence. With regard to tribal cultural resources monitoring for the proposed project, Mitigation Measure CUL-6, Native American Construction Monitoring, requires that Native American monitors be of Kumeyaay descent.

- T1-3:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter T2: Viejas Band of Kumeyaay Indians, June 18, 2020

**T2**

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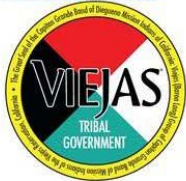
**From:** Ray Teran <rteran@viejas-nsn.gov>  
**Sent:** Thursday, June 18, 2020 5:12 PM  
**To:** Chris Jacobs  
**Cc:** Ernest Pingleton  
**Subject:** Fanita Ranch EIR

T2-1 The Viejas Band of Kumeyaay Indians ("Viejas") has reviewed the proposed project and at this time we have determined that the project site has cultural significance or ties to Viejas. Cultural resources have been located within or adjacent to the APE-DE of the proposed project.

T2-2 Viejas Band request that a Kumeyaay Cultural Monitor be on site for ground disturbing activities and to inform us of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains.

T2-3 If you wish to utilize Viejas cultural monitors, please call Ernest Pingleton at 619-655-0410 or email, epingleton@viejas-nsn.gov, for contracting and scheduling. Thank you.

Ray Teran  
 Viejas Tribal Government  
 Resource Management Director  
 619-659-2312  
[rteran@viejas-nsn.gov](mailto:rteran@viejas-nsn.gov)



**T2-1:** This comment provides an introduction to the comment letter. It correctly states that cultural resources have been located on or adjacent to the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T2-2:** The comment states that a Kumeyaay cultural monitor should be on site for ground-disturbing activities and to inform the commenter of new developments, such as inadvertent discoveries. Mitigation Measures CUL-1, CUL-2, CUL-4, CUL-5, CUL-6, CUL-7, CUL-9, and CUL-11 in Section 4.4.5, Project Impacts and Mitigation Measures, of the EIR specify that a Native American monitor would be present for ground-disturbing activities related to the various preconstruction and construction activities and that the Native American monitor would be of Kumeyaay descent. The measures also address communications with consulting Native American groups. Nevertheless, Mitigation Measure CUL-6 has been revised to further clarify the qualifications of the Native American monitor:

**CUL-6: Native American Construction Monitoring.** A minimum of one Native American Monitor shall be present during ground-disturbing activity for project

construction, including but not limited to site clearing, grubbing, trenching, and excavation, for the duration of the proposed project or until the qualified archaeologist determines monitoring is no longer necessary. The Native American monitors shall be of Kumeyaay descent with ancestral ties to the San Diego region and at minimum 1 year of monitoring experience within Kumeyaay ancestral territory. The Native American monitors shall prepare daily logs and submit weekly updates to the qualified archaeologist and the Project Planner at the City of Santee. In addition, the Native American monitors shall prepare and submit a summary statement upon completion of monitoring to include in the Cultural Resources Monitoring Report prepared for the proposed project (see Mitigation Measure CUL-5). The Project Planner at the City of Santee shall review and include the summary statement as part of the cultural resources monitoring report prepared for the proposed project.

In addition, the Native American monitoring requirements identified in Mitigation Measures CUL-1, CUL-2, CUL-4, CUL-5, CUL-7, CUL-9, and CUL-11 have been revised to require the same qualifications as Mitigation Measure CUL-6.

**T2-3:** This is a closing comment offering Native American monitoring services. It does not raise a significant



environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

Please refer to response to comment T2-2 for revisions made to Mitigation Measure CUL-6.

In addition, the Native American monitoring requirements identified in Mitigation Measures CUL-1, CUL-2, CUL-4, CUL-5, CUL-7, CUL-9, and CUL-11 have been revised to require the same qualifications as Mitigation Measure CUL-6.

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### Comment Letter T3: Kumeyaay Heritage Preservation Council, June 30, 2020



KUMEYAAY HERITAGE PRESERVATION COUNCIL

June 30, 2020

Mr. Chris Jacobs  
Principal Planner, City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

[via email only to: cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

**RE: Fanita Ranch Project – CEQA SCH Number 2005061118**

Dear Mr. Jacobs:

I am writing to you in my capacity as Executive Director of the Kumeyaay Heritage Preservation Council ("KHPC"). KHPC is a coalition of nine federally-recognized Kumeyaay governments collaborating to preserve the heritage, spirituality, and cultural resources of the Kumeyaay within their homelands.

Under California Environmental Quality Act Public Resources Code section 21080.3, KHPC requests Formal Notification of Proposed Projects within the Kumeyaay tribes' Geographic Area of Traditional and Cultural Affiliation, which includes the entirety of the City of Santee. This request includes all information pertaining to the Fanita Ranch Project. In accordance with Public Resources Code Section 21080.3.1, subd. (b), KHPC requests formal notice of and information on proposed projects for which your agency will serve as a Lead Agency under the California Environmental Quality Act (CEQA), Public Resources Code section 21000 et seq. Pursuant to Public Resources Code section 21080.3.1, subd. (b), and until further notice, KHPC hereby designates me, Thomas Holm, as the lead contact person for purposes of receiving notices of proposed projects from your agency. The email and street addresses on my signature line can be used for the delivery of such notices.

Regarding a response to your agency's Fanita Ranch Draft Revised EIR, dated May 29, 2020, due to conditions caused by the COVID-19 pandemic, KHPC requests a 30-day extension (until August 12, 2020) to submit our comments. Further, we request a site inspection of the Fanita Ranch Project area at least 20-days prior to KHPC's submission of comments. Finally, KHPC requests consultation regarding all potential impacts to Kumeyaay cultural resources caused by the Fanita Ranch Project.

Sincerely,

Tom Holm, Executive Director  
Kumeyaay Heritage Preservation Council  
5663 Balboa Avenue, Suite 610  
San Diego, CA 92111  
619 392-8623  
[tomholm@khpc.net](mailto:tomholm@khpc.net)

Manzanita Band of the Kumeyaay Nation, Campo Band of Mission Indians, Ipav Nation of Santa Ysabel, Sycuan Band of the Kumeyaay Nation, San Pasqual Band of Diegueno Mission Indians of California, La Posta Band of Mission Indians, Viejas Band of Kumeyaay Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village A Kumeyaay Nation

**T3**

**T3-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T3-2:** This comment requests the Kumeyaay Heritage Preservation Council (KHPC) receive formal notification of proposed projects within Kumeyaay tribes' geographic area of traditional and cultural affiliation, which includes the entirety of the City of Santee (City) and the proposed project. Further, this comment requests a 30-day extension to submit their comments and requests a site inspection of the project site. In addition, the KHPC requests consultation regarding all potential impacts to Kumeyaay cultural resources caused by the proposed project. The City formally responded to this comment letter on July 2, 2020, stating the following: "This email is in response to the attached letter received from you on behalf of the Kumeyaay Heritage Preservation Council on June 30. On June 10, we also received an email from you on behalf of KHPC, to which we replied on June 11 that your name has been included on the notification list for future projects undergoing environmental review under the California Environmental Quality Act, Public Resources Code section 21080.3.1 (AB 52) regarding

tribal cultural resources. That correspondence is attached for your convenience.

Regarding your request for consultation, as explained in Section 4.4 of the EIR (Cultural and Tribal Resources) for the proposed Fanita Ranch project, on September 7, 2018 the City provided notification of the proposed project to the tribes that had formally requested notice of City projects under AB 52. Thus, the 30-day time period to request consultation under Public Resources Code section 21080.3.1(b) has expired.

Lastly, the City denies your request for a 30-day extension of the comment period on the EIR for the proposed Fanita Ranch project due to Covid-19. There is no requirement under CEQA to extend or suspend public review periods due to the pandemic. This was affirmed in Executive Order N-54-20 issued by Governor Newsom on April 22, 2020.”

## Comment Letter T4: Barona Band of Mission Indians, July 9, 2020



July 9, 2020

Chris Jacobs, Principal Planner  
 Department of Development Services  
 Santee City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071

Re: Comments of Barona Band of Mission Indians on  
 Fanita Ranch Revised Draft EIR

Dear Mr. Jacobs,

Since early 2019 the Barona Tribal Council has worked with City staff and the developer of the Fanita Ranch Project to determine the nature and extent of cultural resources affected by this project, as well as appropriate mitigation measures, should the project move forward. Several Tribal Council members personally visited and viewed the site, and carefully considered the measures already committed to by the developer (moving a road, relocating certain structures), and proposed (capping a sensitive area). It has also considered the Phase I and II reports and surveys, especially of the habitation areas (CA-SDI-8243 and CA-SDI-8345), as well as the draft EIR and associated graphics. The Tribal Council also submitted a letter dated September 24, 2019 making specific points regarding mitigation.

After considering all these materials, and recalling the very informative on-site visit, the Tribal Council wishes to state that the proposed mitigation measures, if fully implemented as previously presented and described below, are satisfactory to the Barona Band, with the following final specific points:

1. Pulling the north edge of the development footprint, just north of the active adult area, back and to the south, as previously proposed, is necessary to reduce the likelihood of disturbance of known and as yet unknown cultural resources just north of that area. In particular, the EIR at p. 4.4-46, calls for a surface inventory extending 100 feet from the edge of the development footprint of known culturally sensitive areas. This additional survey is welcome but, in the opinion of the Tribal Council, not sufficient. Instead, the Tribal Council would like to see this added survey extend at least 300 feet, rather than the proposed 100 feet, given the nature and extent of known cultural resources in the immediate area. If additional significant cultural resources are thus observed, appropriate additional measures should be taken to protect them.
2. The capping of the sensitive area whose mitigation measures are noted in CUL-1, beginning at p. 4.4-47 of the EIR and described in a drawing entitled "Cultural Site

1095 Barona Road, Lakeside, California 92040-1599 • Phone 619.443.6612 • Fax 619.443.0681

T4

**T4-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. On July 31, 2020, the City of Santee (City) sent a letter to the commenter concluding Assembly Bill 52 consultation under California Public Resources Code, Section 21080.3.2, and addressing the proceeding points in the comment letter.

**T4-2:** This comment concerns the condition of approval addressing areas outside the area of potential effect (see Section 4.4.5.2, Threshold 2: Archaeological Resources, in the EIR). The City shall include in the EIR and related entitlement documents for the proposed project the following amended condition of approval to be completed prior to the issuance of grading permits:

In an effort to cooperate with Barona, the City has agreed that a surface inventory of sensitive areas adjacent to the proposed project's development footprint (but outside of the APE) shall be a condition of approval for the proposed project and shall be completed prior to the issuance of grading permits. This inventory shall be completed by a qualified archaeologist who meets or exceeds the Secretary of

Interior's Professional Qualifications Standards for archaeology and a Native American monitor of Kumeyaay descent. The inventory shall be limited to ~~400~~ 300 feet from the development footprint and shall be focused on areas that are known to be sensitive for cultural resources. In the event a cultural resource or TCR is identified adjacent to the proposed project's development footprint, the resource shall be recorded using the California Department of Parks and Recreation Series 523 forms, and environmental sensitive area fencing shall be put in place to protect the resource prior to ground-disturbing activities and shall remain in place until project-related ground disturbance is complete. Because these areas are outside of the proposed project's development footprint and would not be impacted by the proposed project development, no further analysis beyond a surface inventory shall be completed.

**T4-3:** This comment states that the capping of sensitive areas noted in Mitigation Measure CUL-1 and described in a drawing dated March 19, 2019, is essential, and if fully implemented, this measure would be satisfactory. This commitment is reflected in Mitigation Measure CUL-1 (Site Capping Program). All mitigation measures identified in the EIR would be made enforceable conditions of approval for proposed project, if approved by the City, consistent with California Public Resources Code,

T4-3  
cont. Section, CA-SDI-8243, Section A, Full Cap Over Rock Outcropping, VTM/Preliminary Grading Plan”, dated March 19, 2019, is essential. If fully implemented, this measure is satisfactory, especially because the only structures planned for the immediate area are non-intensive (e.g., soccer fields, etc.).

T4-4 3. The special fragment discovered on the surface within CA-SDI-8345 must be reburied in place to a depth of at least 6 feet, by Kumeyaay representatives and with appropriate reverence and dignity.

T4-5 Subject the above conditions, the draft EIR is satisfactory to the Barona Band, should the project proceed.. The Barona Band speaks only for itself on this subject, and invites the views of other Kumeyaay peoples with whom it has not been able to consult due to recent conditions. The Tribal Council also thanks the City of Santee Staff and the developer’s representatives for their courtesy, sensitivity to cultural concerns, and respect for the area’s original people.

Sincerely yours,  
  
 Edwin “Thorpe” Romero,  
 Chairman

Section 21081.6(b) and CEQA Guidelines, Section 15126.4(a)(2). The City would also adopt a mitigation monitoring and reporting program that is designed to ensure compliance with all mitigation measures during project implementation, consistent with California Public Resources Code, Section 21081.6(a)(1).

**T4-4:** This comment refers to the special fragment discovered on the surface in CA-SDI-8345. The special fragment will be reburied in place to a depth of at least 6 feet by Kumeyaay representatives and with appropriate reverence and dignity per the commenter’s request. This requirement would be a condition of approval for the proposed project, as currently documented in Confidential Appendix E3, Confidential Tribal Cultural Resources Consultation Efforts Memorandum, of the EIR (see heading AB 52 Consultation Results to Date, Response to Item 4) and would, therefore, be included on grading plans for the proposed project. A confidential figure showing the revised survey buffer is attached to the City’s letter concluding consultation under Assembly Bill 52.

**T4-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter T5: Kumeyaay Heritage Preservation Council, July 10, 2020



KUMEYAAY HERITAGE PRESERVATION COUNCIL

July 10, 2020

Mr. Chris Jacobs, Principal Planner  
 City of Santee  
 Department of Developmental Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071

[via\\_email\\_only\\_to: cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

Subject: Fanita Revised Draft EIR – Comments from KHPC

Dear Mr. Jacobs:

I am writing to you in my capacity as Executive Director of the Kumeyaay Heritage Preservation Council ("KHPC"). KHPC is a coalition of nine federally-recognized Kumeyaay governments collaborating to preserve the heritage, spirituality, and cultural resources of the Kumeyaay within their homelands.

The purpose of this letter is to comment on the Fanita Revised Draft EIR.

As I mentioned in previous correspondence with you, under provisions stated in the California Environmental Quality Act (CEQA), KHPC requests formal notification of proposed projects within the Kumeyaay's geographic area of traditional and cultural affiliation, which includes the entirety of the City of Santee, including, but not limited to the proposed site of the Fanita Ranch Project. Accordingly, KHPC requests formal notice of and information on proposed projects for which your agency will serve as a lead agency. KHPC hereby designates me, Thomas Holm, as the lead contact person for purposes of receiving notices of proposed projects from your agency. The email and street address on my signature line can be used for the delivery of such notices.

Regarding comments pertaining to Fanita Ranch Draft Revised EIR dated May 29, 2020, KHPC and Kumeyaay Peoples know the area addressed in that report to be sacred, and irreplaceable. Further destruction or development of the Ancestral Kumeyaay Homelands described and targeted in your EIR will destroy unique heritage sites of global scientific and cultural significance.

Science confirms that Kumeyaay ancestors have lived in "Fanita Ranch" for over 12,000 years. This fact alone establishes the Kumeyaay as one of the world's oldest cultures, predating even the Assyrians, Egyptians, and Greeks by many thousands of years. However, Kumeyaay know their lineage goes back eons further, and with recent archaeological discoveries, modern science is only recently beginning to catch up with ancient Kumeyaay knowledge.

Manzanita Band of the Kumeyaay Nation, Campo Band of Mission Indians, Iipay Nation of Santa Ysabel, Sycuan Band of the Kumeyaay Nation, San Pasqual Band of Diegueno Mission Indians of California, La Posta Band of Mission Indians, Viejas Band of Kumeyaay Indians, Mesa Grande Band of Mission Indians, Jamul Indian Village A Kumeyaay Nation

**T5**

**T5-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T5-2:** The comment includes a request to include the Kumeyaay Heritage Preservation Council in formal notification for future projects in the City of Santee (City). As communicated to the commenter on June 11, 2020, the City has included the commenter's name on the notification list for future projects undergoing environmental review under CEQA and the notice list maintained by the City pursuant to Assembly Bill (AB) 52 (tribal cultural resources).

As also communicated to the commenter on July 2, 2020, the time period to request consultation on the proposed project under AB 52 has expired. The City sent AB 52 notification letters to the three tribal contacts that formally requested notification of City projects undergoing environmental review as required under California Public Resources Code, Section 21080.3.1(b), on September 7, 2018. The tribes had 30 days from receipt of the notification letters to request consultation under AB 52. The Kumeyaay Heritage

T5-1

T5-2

T5-3

T5-4

Preservation Council did not request notice of City projects or consultation regarding the proposed project under AB 52 until June 10 and June 30, 2020, after the EIR for the proposed project was released for public review on May 29, 2020, and more than a year and a half after the City notified requesting tribes of the proposed project. Nonetheless, on August 8, 2020, the City sent an email to the commenter requesting a time to discuss their comments on the proposed project outside of the AB 52 process. See also response to comment I114-3 (Comment Letter I114, Margaret Field, July 12, 2020), which addresses the same issue raised in this comment.

- T5-3:** This comment speaks to the cultural significance of the project site but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- T5-4:** This comment speaks to the cultural significance of the project site but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

KHPC Comments to Fanita Revised Draft EIR  
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T5-5  
 Fanita Ranch is indeed an exceptional and precious site, not just to the Kumeyaay who already realize this, but to all humanity, including researchers who are only now beginning to realize the significance of this region. Further damage to Fanita Ranch denies the entire world, and all Peoples within it, a clear threshold into our past which cannot be replaced. Loss of this land in its current state drastically reduces our ability to understand the complex social, economic, and spiritual qualities of one of the most resilient cultures ever known, which has been minimized by racial perspectives that wrongly favored European viewpoints. In these times of shifting cultural perspectives, climate change and other dynamic conditions, we simply cannot afford to squander the lessons of perseverance the Kumeyaay left for us in the area now referred to as Fanita Ranch.

T5-6  
 This region provided a unique setting that allowed ancient Kumeyaay to build and sustain a thriving and complex cultural center, with residential, agricultural, manufacturing, social, trade and spiritual components, all of which are evident today. Also evident, as mentioned in your EIR, are sacred funeral and burial sanctuaries. In fact, researchers have identified no less than 30 significant ancient cultural sites within the proposed Fanita Ranch development area, some of which are listed below. Desecration of any of these precious elements would cause not only unimaginable emotional trauma to remaining Kumeyaay, but also unthinkable losses for researchers seeking knowledge of man's long-sustained management of local natural resources.

T5-7  
 Just three miles south of Fanita Ranch, archaeological work on the Carlton Oaks golf course found over 50 prehistoric sites (SANDAG 2017). Also nearby, on top of Cowles Mountain, an ancient Kumeyaay solstice site once provided a setting of significant spiritual importance. These sites presented evidence of the expansive Kumeyaay culture that once thrived in this area. Sadly, however, those sites have been destroyed, leaving only the precious ancient remains in Fanita Ranch to express the vitality and longevity of one of the Kumeyaay's ancient lineage.

In the words of Dr. Field, a renowned linguist at San Diego State University:

"The indigenous people who inhabited this [Fanita Ranch] site have only ever been Kumeyaay people or their ancestors, who spoke related ancestral languages belonging to either the Yuman language family or the extremely ancient Hokan stock (the oldest language stock in California.)

All of the related descendant tribes (12 of them today in the U.S...) are collectively referred to as the Kumeyaay Nation. In other words, no other unrelated indigenous group ever inhabited this location. In my opinion the Fanita Ranch site appears to be a key link in a chain of prehistoric Kumeyaay sites since it has yielded so much archaeological information to date, and undoubtedly has more to tell us."

Few, if any, places on earth can claim that only one civilization has remained in one location in excess of 12,000 years, but that is exactly what occurred in the region referred to as Fanita Ranch, which is targeted for obliteration. It is unconscionable to even consider such a misappropriation of culture, history, heritage, and more.

**T5-5:** This comment speaks to the cultural significance of the project site but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T5-6:** This comment discusses the prehistoric and historical use of the region and the overall archaeological sensitivity of the region. The concern of the commenter is noted. The City and a Secretary of the Interior qualified archaeologist retained by the City worked diligently with the most likely descendant (MLD) and consulting tribe to address the heritage value of the resources. Mitigation measures were developed by the qualified archaeologist, in consultation with the MLD and consulting tribe, and received concurrence from the lead agency. With incorporation of the mitigation measures in the EIR, the proposed project would result in a less than significant impact to cultural resources.

**T5-7:** This comment discusses the prehistoric and historical use of the region and the overall archaeological sensitivity of the region. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

KHPC Comments to Fanita Revised Draft EIR  
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T5-8	<p>Your Draft EIR mentions surveys done within a one-mile radius of the proposed construction site revealed 95 ancient cultural sites. Such saturation indicates that there is really only one "site" – the entire region! The Pyramids of Giza in Egypt, Angkor Wat in Cambodia, the Acropolis in Greece, Petra in Jordan, and nearly all other iconic ancient cultural centers are more than the sum of their parts. Each is viewed upon as a singular "site" with global importance. Such should be the case of the ancient complex within Fanita Ranch, which predates each of those UNESCO World Heritage Sites by many thousands of years. Eventually, when local Anglo biases subside, the significance of the Kumeyaay Peoples, and the social complex they engineered in "Fanita Ranch," will be realized. Then, perhaps their remarkable cultural center will rightly join the ranks of their subsequently- established peers. This cannot be done if their legacy is destroyed by construction (and destruction) in Fanita Ranch.</p>
T5-9	<p>Certainly, developing Fanita Ranch will make money for the City of Santee, but at the great expense of the already-exploited Kumeyaay, as well as humanity as a whole. A superior plan would be to establish a Kumeyaay Reserve and Cultural Center with local indigenous leaders. Tourism revenue generated from heritage sites can provide substantial income for local economies. If thoughtfully planned, revenue for our community from a reserve and cultural center could surpass destructive residential development, while generating goodwill with local residents and the Kumeyaay Nation.</p>
T5-10	<p>"Capping" culturally-sensitive areas has been suggested, but doing so, or even leaving them uncapped while building around them, would make it impossible to observe the habitat in its nearly pristine state. A cultural site is not defined only by the "archaeological" material beneath the surface, but equally so by the native plants, animals, landscape, water features, sights, and smells in that setting. Within the planned zone of development, CA-SDI-8243 and CA-SD-8345 have both been identified by archaeologists as prehistoric habitation sites consisting of many milling features, ceremonial items, and human remains. If construction/destruction is permitted in these area, or within the greater cultural site, these features will be at least severely altered, but more likely, destroyed. Concurrently, threatened, or endangered native bird, mammal, reptile, and plant species, which helped sustain the Kumeyaay for thousands of years, will be displaced, completely decimating the region's unique biosphere. Conversely, by starting at its current state, native flora and fauna could be nurtured to reinvigorate a complete environment conducive with ecotourism, environmental studies, cultural rejuvenation of the Kumeyaay, and so much more.</p>
T5-11	<p>Your own EIR states CA-SDI-8243 (only one component of the overall cultural center) yielding 473 artifacts. It is described as a large prehistoric habitation site containing ceremonial quartz crystals and human remains. Those, and many additional features still present at that location, provide the opportunity to continue yielding data under the supervision of the Kumeyaay. Even the archaeologists who contributed to your EIR recommended this setting as eligible for the National Register of Historic Places by "Hav[ing] yielded, or may be likely to yield, information important in prehistory or history." and "Development impact would be significant."</p>

**T5-8:** This comment provides an opinion regarding the archaeological sensitivity of the region. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**T5-9:** This comment provides alternative uses for the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**T5-10:** This comment discusses capping sensitive cultural sites. Mitigation Measure CUL-1 (Site Capping Program) requires placement of a cap on sites with human remains. See response to comment I114-5 (Comment Letter I114, Margaret Field, July 12, 2020), which addresses the same issues raised in this comment.

**T5-11:** This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

KHPC Comments to Fanita Revised Draft EIR  
 July 10, 2020  
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T5-12 Another section of this vast cultural complex is CA-SDI-8345. According to the EIR, it is also considered a habitation site, consisting of several bedrock outcrops with milling features, resource processing tools and habitation “debris” (faunal, ceramics, and lithics, a ceremonial artifact) and the presence of human remains. This demonstrates the site functioned as a habitation site, and the diversity of artifacts found there also potentially qualify it for inclusion in the NRHP.

T5-13 Concerning the human remains found at both CA-SDI-8243 and CA-SDI-8345, as pointed out in the EIR, bits of bone, some of which are burned, are located on shallow soil and appear to have surfaced by means of bioturbation (animals or plants disturbing the soil). Atkins (2016, cited in the EIR) found concentrations of highly fragmented burned bone within and immediately west of the updated CA-SDI-8243, and within the updated boundary of CA-SDI-8345. All of them occur near large collections of bedrock milling features. As the EIR states, because of the condition of these remains and their context occurring within this large site, it is likely that this bone represents human cremations which may extend into the subsurface. If, as suggested by the archaeologists, these two sites represent habitation centers, these pieces of bone may have migrated to the surface over the centuries from a village cemetery. Because of the extraordinary sanctity of human remains, the areas in which they are found must be protected. Further, because human remains can become nearly microscopic over time, if soils are disturbed in these areas, comprehensive soils testing must be completed during such disturbances (which we feel should be avoided at all costs). In fact, KHPC requests the use of cadaver dogs during a more extensive survey of the area. And we request only Kumeyaay monitors be used during such subsequent studies.

T5-14 Equally important, it is not just the human remains which need to be protected in these sites, but this entire biosphere needs to be preserved, as the last example of a nearly-pristine Kumeyaay cultural center. Its educational value lies not only in what archaeologists may find by digging underneath them, but in leaving them alone to be observed as they are. Local flora and fauna are also relevant to understanding traditional Kumeyaay lifeways, as are unaltered views of the stars, planets, and constellations. Also essential are ancient Kumeyaay paths to the San Diego River, Cowles Mountain, and Sycamore Canyon, all vital cultural resources that will be destroyed by this development.

As stated by Professor Dr. Margaret Field:

“The configuration of these important cultural landmarks makes this site historically significant not only because of criterion D4: “Has yielded, or may be likely to yield, information important in prehistory”, but also because of criterion C: “Embodies the distinctive characteristics of a type, period, or region.

In other words, it is the context of the site as a totality, on the hill overlooking the river, valley and mountain (which used to have a sacred site at its top...) as well as the trails that connected all of these places.

**T5-12:** This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**T5-13:** The commenter has expressed concerns for the identification, treatment, and protection of human remains and requests the use of “cadaver dogs during a more extensive survey of the area” and Kumeyaay monitors. Section 4.4.5.3, Threshold 3: Human Remains, of the EIR addresses the treatment of human remains discovered during construction of the proposed project. The City, based on recommendations from its qualified archaeologist, in consultation with the consulting tribe and representative of the MLD, disagrees that the use of cadaver dogs is required to adequately determine the presence of human remains associated with CA-SDI-8243 and CA-SDI 8345. Use of cadaver dogs is not standard practice for Phase I surveys or Phase II testing and evaluation, and neither the MLD nor the consulting tribe recommends it. Moreover, it had already been established that human remains were present in these areas and, therefore, would not change the California Register of Historical Resources eligibility of these resources. In response to the commenter’s concern regarding a Kumeyaay monitor, the Phase III data recovery excavation program mitigation measure requires that all work related to this effort be observed by a Kumeyaay monitor (see Mitigation Measure CUL-2).

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T5-14  
 cont.

As CEQA makes clear, archaeological sites may qualify as historic resources and are most often done so with reference to criterion D4, but many archaeological sites are denied this status because they are described as being without any context, being counted as "isolates" or having impaired stratigraphic context for various reasons. But in the case of Fanita Ranch, there appears to be plenty of evidence that it was a village... [S]o the case may be made that the many archaeological sites are most likely extensions of a single "habitation centers." Viewed in this context, according to criterion C, "embodies the distinctive characteristics of a type, period, or region," many of the 20 other smaller archaeological sites explored for the EIR could be considered eligible as historical resources.

In other words, it is not just what may lie beneath them which makes them valuable as historical resources, but their contiguity- altogether, they constitute one large historical resource - a Kumeyaay village which was very likely inhabited right into the proto-historic period (EIR p. 25)."

T5-15

Thus, as one unique, irreplaceable Kumeyaay cultural center of global cultural significance, and when considering KHPC's comments, and all pertinent laws and regulations, currently proposed construction/destruction, and all ground disturbances within "Fanita Ranch" must be halted immediately and indefinitely.

T5-16

CEQA 21080.3.1 e, states: "The lead agency shall begin the consultation process within 30 days of receiving a California Native tribe's request for consultation." KHPC, as a representative of nine "California Native tribes," has made that request and now looks forward to beginning those consultations with you, as "lead agency." As a part of this process, we expect you to honor KHPC's request for additional time to enable our member Kumeyaay tribes to add their comments, be heard through comments and consultations, and have our requests fulfilled.

Respectfully,



Thomas Holm, Executive Director  
 Kumeyaay Heritage Preservation Council  
 An Alliance of Nine Federally-Recognized Kumeyaay Governments  
 5663 Balboa Avenue, Suite 610  
 San Diego, CA 92111  
 619 392-8623  
[tomholm@khpc.net](mailto:tomholm@khpc.net)

**T5-14:** This comment echoes Dr. Field's concerns related to the eligibility recommendations of some of the resources on the project site. See responses to comments I114-10 and I114-11 (Comment Letter I114, Margaret Field, July 12, 2020), which address the same issues raised in this comment.

**T5-15:** This comment provides an opinion regarding the archaeological sensitivity of the region. See responses to comments T5-2 to T5-14. This comment does not raise any additional environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**T5-16:** This comment reiterates the commenter's request for consultation on the proposed project under AB 52. See responses to comments T5-2 and I114-3 (Comment Letter I114, Margaret Field, July 12, 2020), which address the same issues raised in this comment.

## Comment Letter O1: San Diego County Archaeological Society, Inc., June 10, 2020



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

10 June 2020

RECEIVED

JUN 16 2020

Dept. of Development Services  
City of Santee

To: Mr. Chris Jacobs, Principal Planner  
Department of Development Services  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071

Subject: Draft Revised Environmental Impact Report  
Fanita Ranch

**O1**

**O1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O1-2:** The comment requests edited copies of the confidential cultural resources reports found in Confidential Appendices E1, E2, and E4. Redacted versions of these confidential appendices were provided to the commenter on June 30, 2020, and the commenter confirmed receipt.

**O1-3:** The comment further explains the request for edited copies of the confidential cultural resources reports found in Confidential Appendices E1, E2, and E4. See response to comment O1-2.

Dear Mr. Jacobs:

O1-1

I have reviewed the cultural resources aspects of the subject DREIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DREIR, particularly Section 4.4, we have the following comments to offer.

O1-2

Our letter of 19 November 2018 to Santee's Mr. John O'Donnell, in response to the Notice of Preparation for this DREIR, said:

"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."

We again request edited copies of the appendices E1, E2 and E4, with site locations and SCIC record searches removed, so that we can complete our review. Such edited appendices, with site locational information removed, are routinely provided by other jurisdictions in the county, including both the City of San Diego and the County of San Diego.

O1-3

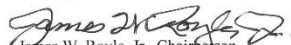
Particularly problematic is that, with no information at all—not even site numbers—other than for the two sites deemed to meet National and California register standards, it is impossible for a reviewer to judge whether any other sites might be significant under CEQA. It may also be that one or more sites might warrant archaeological and Native American monitoring due to a potential for encountering unexpected buried resources.

We believe that the City should not withhold information necessary for an adequate public review, particularly after the City had been made aware of the concern

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- O1-4 Overall, the cultural and tribal resources mitigation measures are comprehensive and well done and we compliment the consultants. Regarding Section 4.4 of the DREIR, our review of the mitigation measures for cultural and tribal cultural resources has resulted in the following comments:
- O1-5 1. CUL-1, for the site capping program, does not require the plan to address restrictions on what may be planted in the cap (typically, deep-rooted species would be excluded), and the responsibility for ensuring that the plantings are maintained until established. Future access to the capped area should also be addressed, including by the Kumeyaay. Restrictions should be applied to guide the use, if any, of fertilizers and other chemicals on the capped area. And capping soil should be visually distinct from the native soil below.
- O1-6 2. In the last sentence of CUL-2, the report should be provided to the San Diego Archaeological Center, not "the San Diego Archaeological Society".
- O1-7 3. In CUL-8, the curation facility should be one located in San Diego County, so that wording should be inserted between "at a facility" and "that meets".
- O1-8 4. The last sentence of the first paragraph of CUL-11 tells what to do if a superseding agency requires curation, saying it should be guided by the State Historical Resources Commission's guidelines. If the superseding agency were to be federal, the applicable regulations would come from 36CFR79, so that should also be cited.
- O1-9 We await the edited versions of appendices E1, E2 and E4, so that we can complete our review.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: Rincon Consultants  
SDCAS President  
File

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- O1-4:** The comment says that, overall, the cultural and tribal resources mitigation measures are comprehensive and well done. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- O1-5:** This comment is the same as comment O2-5 submitted by the commenter in their July 6, 2020, letter on the EIR (Comment Letter O2, San Diego County Archaeological Society, Inc., July 6, 2020). See response to comment O2-5.
- O1-6:** This comment is the same as comment O2-6 submitted by the commenter in their July 6, 2020, letter on the EIR (Comment Letter O2, San Diego County Archaeological Society, Inc., July 6, 2020). See response to comment O2-6.
- O1-7:** This comment is the same as comment O2-7 submitted by the commenter in their July 6, 2020, letter on the EIR (Comment Letter O2, San Diego County Archaeological Society, Inc., July 6, 2020). See response to comment O2-7.
- O1-8:** This comment is the same as comment O2-8 submitted by the commenter in their July 6, 2020, letter on the EIR (Comment Letter O2, San Diego County Archaeological Society, Inc., July 6, 2020). See response to comment O2-8.
- O1-9:** This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.



## Comment Letter O2: San Diego County Archaeological Society, Inc., July 6, 2020



**San Diego County Archaeological Society, Inc.**

Environmental Review Committee

6 July 2020

**RECEIVED**

JUL 06 2020

Dept. of Development Services  
City of Santee

To: Mr. Chris Jacobs, Principal Planner  
Department of Development Services  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071

Subject: Draft Revised Environmental Impact Report  
Fanita Ranch

**O2**

**O2-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O2-2:** This comment relates to concerns regarding potential indirect impacts to sites CA-SDI-8243 and CA-SDI-8345. As explained in Section 4.4.5.2, Threshold 2: Archaeological Resources, of the EIR, because portions of these archaeological sites are in the development footprint of the proposed project, impacts to these resources would be potentially significant. The proposed project has been designed to avoid or cap a minimum of 40 percent of CA-SDI-8243 and avoid a minimum of 60 percent of CA-SDI-8345 as shown on the Vesting Tentative Map. The Site Capping Program is set forth in Mitigation Measure CUL-1 and requires a minimum of 24 inches of fill material to be maintained between the surface of the archaeological cap and any ground-disturbing activities.

Dear Mr. Jacobs:

- O2-1 | Thank you, Breanna Campbell and Lindsay Puckett for the efforts made to provide SDCAS with a redacted version of the cultural resources appendices. They have been very helpful and have provided the information to enable us to complete our review of this DREIR.
- O2-2 | The principal concern we have with the cultural resources impact analysis and mitigation measures is regarding potential indirect impacts to the adjoining portions of sites SDI-8243 and SDI-8345. Having portions of these sensitive sites close to future residence raises concerns with adventurous residents engaging in inadvertent and/or intentional impacts. And property owners adjacent to open areas (think canyon rims, for example) are notorious for expanding their activities and plantings beyond their property lines.
- O2-3 | Another related concern is the vegetation management done adjacent to the developed areas in the interests of maintaining defensible space against fires. This can expose the surface component of sites. And mechanical equipment used for vegetation management could potentially damage the subsurface component.
- O2-4 | It is therefore essential for the DREIR to address these potential indirect impacts and provide appropriate mitigation measures. These may possibly include capping additional portions of SDI-8243 and SDI-8345 and permanent, rather than just temporary, fencing. An ongoing program of inspections, perhaps annually and involving the Kumeyaay, may also be appropriate.
- O2-5 | Repeating comments from our letter of June 10<sup>th</sup>, our comments on DREIR Section 4.4 (some of which may have been already incorporated in the versions of the appendices provided to us) are:
  1. CUL-1, for the site capping program, does not require the plan to address restrictions on what may be planted in the cap (typically, deep-rooted species would be excluded), and the responsibility for ensuring that the plantings are maintained until established. Future access

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An Active Adult facility would be constructed, and a defensible space/fuel modification zone would be maintained near the avoided portions of CA-SDI-8243 (Appendix P1). It is unlikely that residents of the facility

would engage in unauthorized planting of vegetation or encroachment within the defensible space/fuel modification zone. The Cuyamaca Street extension and a single water storage tank would be near portions of CA-SDI-8345 that would be avoided by the proposed project; however, no residences are planned adjacent to this locality. These uses are unlikely to result in the type of inadvertent impacts opined by the commenter. The MLD and the consulting tribe have concurred with this proposed plan for capping.

- O2-3:** This comment relates to the effect of vegetation management on subsurface components of sites. Pursuant to Mitigation Measure CUL-2 (Phase III Data Recovery Excavation Program), a Phase III archaeological data recovery program would take place for the proposed project where impacts would occur; this includes vegetation management areas within the site boundaries. Additionally, archaeological and Native American monitoring would take place during all ground-disturbing activities related to the proposed project; this includes the clearing of fire protection areas (see Mitigation Measures CUL-5 and CUL-6).
- O2-4:** This comment again relates to indirect impacts to sites SDI-8243 and SDI-8345. The commenter suggests permanent fencing or capping be used to avoid indirect impacts to additional portions of the two archaeological

sites. Please refer to response to comment O2-2, which addresses the same issue as this comment.

- O2-5:** This comment requests incorporation of planting and fertilizer restrictions for the cap (with capping soil being visually distinct from native soil below), as well as access restrictions, in Mitigation Measure CUL-1. The capped area will be a public park. The City agrees with these requests, and the following portion of Mitigation Measure CUL-1 has been revised to state the following:

Capping soils shall be visually distinguishable from the native soils below. A minimum of 24 inches of fill material shall be maintained between the surface of the archaeological cap and any ground disturbing activities. Ground disturbing activities include but are not limited to grading; excavation; compaction; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any, underground utilities, building or structure. Restrictions shall be applied regarding species planted within the cap (deep-

- O2-5 cont. | to the capped area should also be addressed, including by the Kumeyaay. Restrictions should be applied to guide the use, if any, of fertilizers and other chemicals on the capped area. And capping soil should be visually distinct from the native soil below.
- O2-6 | 2. In the last sentence of CUL-2, the report should be provided to the San Diego Archaeological Center, not "the San Diego Archaeological Society".
- O2-7 | 3. In CUL-8, the curation facility should be one located in San Diego County, so that wording should be inserted between "at a facility" and "that meets".
- O2-8 | 4. The last sentence of the first paragraph of CUL-11 tells what to do if a superseding agency requires curation, saying it should be guided by the State Historical Resources Commission's guidelines. If the superseding agency were to be federal, the applicable regulations would come from 36CFR79, so that should also be cited.
- O2-9 | Again, thank you for the efforts to provide the redacted appendices so that our review could be completed. We appreciate the opportunity to participate in the City's environmental review process for this project.

Sincerely,  
  
 James W. Royle, Jr., Chairperson  
 Environmental Review Committee

cc: Rincon Consultants  
 SDCAS President  
 File

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rooted species would be avoided in areas where the cap does not exceed 10 feet). Additionally, chemical agents such as fertilizer shall be avoided in areas where the cap does not exceed 24 inches.

**O2-6:** This comment involves replacing the term "San Diego Archaeological Society" with "San Diego Archaeological Center." The City agrees with this request, and the following portion of Mitigation Measure CUL-2 (Phase III Data Recovery Excavation Program) has been revised to state the following:

Following the completion of the Phase III data recovery fieldwork, the results shall be summarized in a Phase III Data Recovery Report. The report shall be completed by a qualified archaeologist and shall include the results of the fieldwork and laboratory analysis and address the research questions established in the Phase III Data Recovery Plan. The report shall also include the California Department of Parks and Recreation Series 523 form updates for the sites CA-SDI-8243 and CA-SDI-8345. The report shall be submitted to the consulting Native American groups and the Project Planner at the City of Santee for review. Upon acceptance of the final report, an electronic version of the final report shall be submitted to the South Coastal Information Center and the San Diego Archaeological Center Society.

- O2-7:** This comment relates to the curation of archaeological finds. The City agrees with this request, and Mitigation Measure CUL-8 (Curation of Archaeological Resources) has been revised to state the following:

Upon completion of project construction, archaeological collections that have not been repatriated or buried on site (per Mitigation Measure CUL-11), along with final reports, field notes, and other standard documentation collected, shall be permanently curated at a facility in San Diego County that meets the State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections. A qualified archaeologist who meets or exceeds the Secretary of the Interior's Professional Qualifications Standards for archaeology shall be required to secure a written agreement with a recognized museum repository regarding the final disposition and permanent storage and maintenance of all archaeological resources recovered as a result of the Phase III archaeological investigations and monitoring activities that have not been repatriated or buried on site. The written agreement shall specify the level of treatment (preparation, identification, curation, cataloging) required before the collection would be accepted for storage. The cost of curation is assessed by the repository and is the responsibility of the applicant.

**O2-8:** This comment relates to state and federal curation regulations. The City agrees with this request, and the following portion of Mitigation Measure CUL-11 (Treatment and Disposition of Tribal Cultural Resources) has been revised to state the following:

The applicant shall relinquish ownership of all non-burial related tribal cultural resources collected during the grading monitoring program and to the extent performed by the applicant, from any previous archaeological studies or excavations on the project site to the most likely descendant tribe for proper treatment and disposition per the Cultural Resources Mitigation and Monitoring Program (Mitigation Measure CUL-4). Any burial related tribal cultural resources (as determined by the most likely descendant) shall be repatriated to the most likely descendant as determined by the Native American Heritage Commission pursuant to California Public Resources Code, Section 5097.98. If none of the consulting tribes accept the return of the cultural resources, then the cultural resources shall be subject to the curation requirements stipulated in Mitigation Measure CUL-8) In the event that curation of tribal cultural resources is required by a superseding regulatory agency, curation shall be conducted by an approved facility and the curation shall be guided by the State Historical Resources Commission's

Guidelines for the Curation of Archaeological Collections. In the event the superseding agency is a federal agency, Title 36 of the Code of Federal Regulations, Part 79, shall be followed . . . .

- O2-9:** This comment thanks the City for providing redacted versions of the confidential appendices requested by the commenter on June 10, 2020. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

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## Comment Letter O3: Sierra Club, San Diego Chapter, July 11, 2020



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**Revised Environmental Impact Report Fanita Ranch Project SCH No. 2005061118**

Dear Mr. Jacobs,

O3-1

Fanita Ranch is a large development for approximate 3,000 new housing units planned and over 8,000 residents to be embedded in the rugged topography of northern Santee. As in the past, Sierra Club opposes the approval of this project for numerous reasons. We detail these many problems with the project below.

**1) Protected Species**

O3-2

The Fanita Ranch project is located on land adjacent to and indistinguishable from the pristine Mission Trails Park, the vast Marine Corps Air Station Miramar, and Sycamore Canyon preserve to the north. As a result this land has high biological value containing many species of plants and animals and wildlife corridors. Without question a large development in this area will degrade the biological resources in this region. According to the Center for Biological Diversity "Fanita Ranch contains rich chaparral, coastal sage scrub and vernal pool habitats, and supports many rare plants and animals in addition to the Quino checkerspot

**O3**

**O3-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O3-2:** This comment provides background information on the project site, including location and a brief summary of the types of resources present on the project site, including coastal sage scrub, vernal pool habitat, rare plants, Quino checkerspot butterfly (*Euphydryas editha quino*), coastal California gnatcatcher (*Poliophtila californica californica*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), and willowy monardella (*Monardella viminea*). The comment makes a general statement that “development in this area will degrade the biological resources in this region.” The EIR addresses impacts to biological resources in Section 4.3, Biological Resources. Please also refer to Thematic Responses – Quino Checkerspot Butterfly, Coastal California Gnatcatcher, and Wildlife Movement and Habitat Connectivity. The comment does not raise a specific significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

O3-2  
cont.

butterfly, including [California gnatcatchers](#), San Diego fairy shrimp, and [willow monardella](#).”

O3-3

The RDEIR states: A total of 22 special-status birds were observed: Cooper’s hawk (*Accipiter cooperii*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), grasshopper sparrow (*Ammodramus savannarum*), oak titmouse (*Baeolophus inornatus*), coastal cactus wren, northern harrier (*Circus cyaneus*), willow flycatcher (*Empidonax traillii*), merlin (*Falco columbarius*), American peregrine falcon (*Falco peregrinus anatum*), yellow-breasted chat (*Icteria virens*), loggerhead shrike (*Lanius ludovicianus*), osprey (*Pandion haliaetus*), coastal California gnatcatcher, rufous hummingbird (*Selasphorus rufus*), yellow warbler (*Setophaga petechia*), Brewer’s sparrow (*Spizella breweri*), golden eagle (*Aquila chrysaetos*), Bell’s sage sparrow (*Artemisiospiza belli belli*), long-eared owl (*Asio otus*), white-tailed kite (*Elanus leucurus*), California horned lark (*Eremophila alpestris actia*), and least Bell’s vireo.

Additionally the parcel contains vernal pools with the endangered San Diego fairy shrimp and well as the Hermes Copper butterfly, and the listed Federally Endangered least Bell’s vireo. The RDEIR technical report maintains that Golden Eagles, a protected California Species have been observed multiple times on this property.

O3-4

A primary and fundamental failing of the Fanita Ranch project is the direct and indirect impacts of habitat loss for all the special status species. There is high potential of nearly immediate disruption or abandonment of raptor’s foraging areas coinciding with issue of the project’s first grading permits. Mitigation factors are of no value when the degradation and loss of habitat induce forced dispersal of the above special status and listed species.

O3-5

The biological report also uses models of the prevalence of various species rather than careful field studies and observations that are more definitive in the location of sensitive species. Without such careful observations of the fauna including the abundance, range, breeding, movement, status, density, seasonal use, and migration, the models in the RDEIR are mere estimates. Truncated studies of sensitive species represent an interwoven potential for ecologically cascading losses. There simply are no substitutes for careful field studies and ground truthing of habitats. The City of Santee is responsible for the oversight and

**O3-3:** This comment restates information in the EIR. The comment does not raise a specific significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O3-4:** This comment summarizes the findings from the EIR that that proposed project would result in direct and indirect impacts of habitat loss for special-status species. The comment further restates the findings from the EIR regarding the potential disruption or abandonment of raptors’ foraging areas. The comment expresses the opinion of the commenter that “mitigation factors are of no value when the degradation and loss of habitat induce forced dispersal of the above special status and listed species.”

Impacts to biological resources are analyzed in Section 4.3, Biological Resources. Special-status species and foraging habitat are discussed in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, and impacts are summarized in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species. As described therein, the proposed project would result in potentially significant impacts to special-status species, and mitigation measures are proposed to reduce impacts to less than significant. Mitigation measures include Preserve Management Plan (BIO-1), Upland Restoration Plan (BIO-2), Narrow Endemic Plant Species (BIO-3),

Oak Tree Restoration Plan (BIO-4), Preconstruction Surveys and Avoidance and Minimization Measures for Special-Status Plant Species (BIO-5), Land Use Adjacency Guidelines (BIO-6), Stormwater Pollution Prevention Plan (BIO-7), Approved Biologist (BIO-8), Habitat Preserve Protection (BIO-9), Weed Control Treatments (BIO-10), Argentine Ant Control and Monitoring (BIO-11), Vernal Pool Mitigation Plan (BIO-12), Western Spadefoot Relocation (BIO-13), Nesting Bird Survey (BIO-14), Wetland Mitigation Plan (BIO-15), Coastal Cactus Wren Habitat Management (BIO-16), Brown-Headed Cowbird Trapping (BIO-17), Restoration of Suitable Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly (BIO-18), African Clawed Frog Trapping (BIO-19), Wildlife Protection (BIO-20), and Fire Protection Plan (BIO-21). These measures have been prepared in compliance with CEQA requirements for mitigation measures using the best available scientific information and would be implemented through a Mitigation Monitoring and Reporting Program, including permanent funding of the costs to manage and monitor the preserve to ensure they are implemented. No specific inadequacy with the mitigation measures is identified in the comment; therefore, no more specific response can be provided or is required.

- O3-5:** This comment states that Appendix D, Biological Resources Technical Report, of the EIR “use[d] models

of the prevalence of various species rather than careful field studies and observations that are more definitive in the location of sensitive species.” The comment expresses the commenter’s opinion that “there simply are no substitutes for careful field studies and ground truthing of habitats” and that “less than comprehensive studies and analysis jeopardizes Santee’s quality of life for all established and future residents.” The EIR summarizes site-specific surveys in Section 4.3.1.1, Biological Survey Methods. As described therein, a substantial amount of field studies were conducted, including over 760 person-days of site-wide and focused surveys on the project site, including a focused survey exclusively for willow monardella and rare plants (40 person-days) and 8 sensitive wildlife species, including Quino checkerspot butterfly (413 person-days), burrowing owl (*Athene cunicularia*; 17 person-days), coastal California gnatcatcher (118 person-days), least Bell’s vireo (*Vireo bellii pusillus*; 10 person-days for riparian birds collectively), southwestern willow flycatcher, coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; 3 person-days), San Diego fairy shrimp (40 person-days for fairy shrimp collectively), Riverside fairy shrimp (*Streptocephalus woottoni*), Hermes copper butterfly (*Lycaena hermes*; 75 person-days plus 15 person-days in 2020), and western spadefoot (*Spea hammondi*; 3 person days plus USGS survey). In addition, previous wetlands jurisdictional

delineations (22 person-days plus additional surveys in 2020) were updated and verified. These surveys are further described in Section 3, Survey Methodologies, of Appendix D. Survey results are presented in Section 4.3.1.2, General Biological Survey Results; Section 4.3.1.3, Jurisdictional Aquatic Resources; Section 4.3.1.4, Special Biological Resources; and Section 4.3.1.5, Wildlife Corridors and Habitat Linkages.

With respect to the use of models, as described in Section 3.3, Habitat Modeling, of Appendix D, “suitable habitat for all special-status wildlife species that occur or have potential to occur on site was modeled to help evaluate impacts to habitat for special-status wildlife species.” Further, “most of the suitable habitat models are based on the vegetation communities found on site, but some also incorporated additional information, such as slope, distance from known occurrences from survey data, and presence of host plants.” Thus, the modeling supplemented and was based on actual site-specific data and, therefore, represents a comprehensive analysis of the on-site conditions of the project site.

O3-5 cont.	accuracy of the RDEIR and the required biological studies. Anything less than comprehensive studies and analysis jeopardizes Santee's quality of life for all established and future residents.
<b>1) Loss of Coastal Sage Scrub and Chaparral</b>	
O3-6	The loss of Coastal Sage Scrub and chaparral is a major cost from this project for two reasons. First these endangered ecosystems consist of biologically important plants and animals that are rapidly diminishing in California and the world. Second destroying this native environment will remove a major source of carbon sequestration and will contribute to increased Greenhouse Gas.
O3-7	
O3-8	A) The RDEIR admits that sensitive environmental features will be altered and destroyed. The RDEIR states "Natural vernal pools shall be mitigated at a 4:1 ratio, including preservation and management of existing pools, rehabilitation/enhancement of existing features within the Habitat Preserve, and creation of new features. Constructed pools (i.e., artificial features and street ruts) shall be mitigated through rehabilitation/enhancement and/or creation at a 3:1 or 2:1 ratio, depending on whether the feature supports plant or wildlife indicator species." There is however no mention of the effectiveness of these mitigation measures. To comply with recent California Court rulings the mitigation measures must be real, additional, observable, enforceable, and located in San Diego County. Simply calling something mitigation will not stand up legally. Mitigations must add additional elements, not just preserve an existing parcel, project or species. They must be monitored or enforced or they are not legal. Nothing in the RDEIR speaks to any of the requirements. In short the difficulty of real mitigation means that these sensitive Coastal Sage Scrub and Chaparral ecosystems will be destroyed.
O3-9	B) There is no section of the RDEIR that addresses the carbon absorbing potential of Coast Sage Scrub and Chaparral. Published research from our own San Diego State University has shown that coastal sage Scrub and chaparral are very efficient at carbon absorption and oxygen production (see "Mature semiarid chaparral ecosystems can be a significant sink for

3

**O3-6:** This comment states that the loss of coastal sage scrub and chaparral is a major cost because these ecosystems consist of biologically important plants and animals. The EIR addresses impacts to biological resources in Section 4.3, Biological Resources. The comment does not raise a specific significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O3-7:** This comment states destroying the native environment will remove a major source of carbon sequestration and will contribute to increased greenhouse gas (GHG) emissions. The EIR adequately addresses this issue. Mitigation Measure GHG-5 requires that the proposed project plant at least 26,705 trees and at least 237.4 acres of bushes and hedges on site. As shown in Table M, Estimated Gains and Losses of Sequestered Carbon, in Appendix H, Greenhouse Gas Analysis, of the EIR the recommended mitigation would ensure that the proposed project would result in a net annual reduction of 530.70 MT CO<sub>2</sub>e in GHG emissions. Therefore, the project would fully mitigate for the loss of sequestered carbon on site.

**O3-8:** This comment restates information from the EIR regarding mitigation ratios for impacts to vernal pools. The comment questions the effectiveness of the mitigation measures and states that mitigation measures must be "real, additional, observable, enforceable, and

located in San Diego County.” The comment expresses the commenter’s opinion that mitigation must “add additional elements, not just preserve an existing parcel, project or species.”

The comment conflates a recent Court of Appeals ruling on the County of San Diego Climate Action Plan with mitigation for direct project impacts to biological resources. Implementation of wetland and vernal pool restoration and re-creation is a long-accepted form of mitigation for impacts to these resources. Such restoration plans require a 5-year management and monitoring period, with success criteria guiding the management following a lengthy permitting process whereby the appropriate agencies (i.e., CDFW, ACOE, and SDRWQCB) determine the adequacy of mitigation sites and ratios. Mitigation Measure BIO-1 states that management shall occur in perpetuity, which includes monitoring. This is further described in the Preserve Management Plan (Appendix P of Appendix D).

- O3-9:** This comment states that the EIR fails to address the carbon absorbing potential of coastal sage scrub and chaparral. The commenter is mistaken. Appendix H includes a full discussion of carbon sequestration under the title, Landscaping Sequestration and Net Gains/Losses in Carbon Emissions. As shown in Table M, Estimated Gains and Losses of Sequestered Carbon,

O3-9 cont.	atmospheric carbon dioxide.” Luo, Oechel, Hastings, Zuleta, Yonghaiquan, and Hyojungkwon. Global Change Research Group, Department of Biology, San Diego State University, San Diego, CA 92182, USA <i>Global Change Biology</i> (2007) 13, 386–396). The RDEIR states that the most predominant natural habitat is Coast Sage Scrub followed by Chaparral, Grassland, and Riparian. These natural habitats are both as important biological resources and as a way to absorb greenhouse gas. Indeed, all the calculations for Greenhouse Gas (GHG) in the RDEIR are flawed because they fail to consider the carbon absorption and containment of carbon.
	<b>2) Substantial, increased Greenhouse Gas (GHG)</b>
O3-10	The Fanita Ranch project would produce massive amounts of greenhouse gas during the construction, operation, and with vehicle miles travelled. While the installation of feature such as electric car charging station and solar panels is laudable it cannot begin to fully compensate for tremendous net increase in GHG.
O3-11	Merely listing some mitigation measure without calculation the degree to which each mitigation measure reduces GHG is specious and deceptive. In short, the GHG produced by the Fanita Ranch Project is inconsistent with regional goals and California State Law on the reduction of GHG.
O3-12	
O3-13	The underlying flaws of the Greenhouse Gas analysis are immediately evident in the controversial and uniquely Santee-specific <i>Sustainable Santee Plan</i> . Which aside from being currently litigated, has such low achievement standards that any project utilizing current CA building codes would easily qualify as having less than significant GHG impact in Santee.
	<i>“Note that the Screening Tables use a base level of efficiency that corresponds to the California Building Energy Efficiency Standards for Residential and Non-residential Buildings (Title 24, Part 6) that became effective January 1, 2017. These are the statewide minimum requirements of efficiency that are currently (2018) in effect.” (Greenhouse Gas Emissions Screening Tables section C-5)</i>
O3-14	Amassing 100 loosely arbitrary “points” effectively attempts to exempt any size or scale projects from GHG analysis. Left to this unsubstantiated and highly subjective “point review” process, the massive 3,000 dwelling units comprising

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included in Appendix H, implementation of Mitigation Measure GHG-5 would ensure that the proposed project results in a net annual reduction of 530.70 MT CO<sub>2</sub>e in GHG emissions. Therefore, the project would fully mitigate for the loss of sequestered carbon on site.

**O3-10:** This comment states the proposed project would produce massive amounts of GHGs during construction, operation, and with vehicle miles traveled that cannot be fully compensated for. Each of the recommended mitigation measures, which require on-site construction or operational changes to the proposed project, would ensure that the proposed project reduces all GHG emissions below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR.

**O3-11:** This comment states that merely listing mitigation measures without calculating the degree to which each mitigation measure reduces GHG is specious and deceptive. Tables 4.7-10, GHG Emissions with On-Site Mitigation, Preferred Land Use Plan with School, and 4.7-11, GHG Emissions with On-Site Mitigation, Land Use Plan Without School, in Section 4.7, Greenhouse Gas Emissions, include a full overview of the reduction calculations of the proposed mitigation. Additional detail is provided in Appendix H to demonstrate how the measures reduce GHG emissions.



**03-12:** This comment indicates that the proposed project is inconsistent with state and regional GHG reduction goals. Contrary to that statement, the EIR demonstrates that the proposed project, after implementation of the recommended mitigation, would not result in a significant GHG emission impact. Therefore, the proposed project would not conflict with state and regional GHG reduction goals.

Moreover, as explained in Section 4.7.5.2, Threshold 2: Consistency with Applicable Plan, of the EIR, satisfaction of the per capita GHG threshold, which was developed based on the demographic and land use forecasts in the Santee General Plan, quantitatively demonstrates that the proposed project would conform to the GHG reduction targets identified in the Sustainable Santee Plan and help the City meet its GHG reduction commitments in furtherance of state and regional goals.

**03-13:** This comment attacks the validity of the Sustainable Santee Plan, which was approved by the City on January 8, 2020. For clarification, the Sustainable Santee Plan does not rely on Screening Tables (see Chapter 5, Tracking Tools, explaining replacement of the Screening Tables with Climate Action Plan Consistency Checklist). Further, the February 7, 2020, lawsuit filed by Preserve Wild Santee, Climate Action Campaign, and the Center for Biological Diversity challenging the City's

adoption of the Sustainable Santee Plan and certification of the related Environmental Impact Report (Preserve Wild Santee et al. v. City of Santee, San Diego Superior Court Case No. 37-2020-00007331-CU-TT-CTL) has been settled. The lawsuit was dismissed, with prejudice, on July 8, 2020. Because the comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR, no further response is required.

- O3-14:** This comment alleges that the EIR’s GHG analysis of the proposed project relies on Screening Tables included in the Sustainable Santee Plan. The comment is incorrect. As explained in detail in Section 4.7.3, Thresholds of Significance, the per capita GHG threshold was customized for the purposes of this analysis to address new development projects in the City; it did not rely on a point-based system to analyze the proposed project’s GHG emissions. See also response to comment O3-13.

O3-14 cont. Fanita Ranch could be determined "less than significant" in GHG generation, at least before any challenges to the City of Santee's RDEIR.  
*"For this reason, basing a per capita GHG threshold on the data collected for the Sustainable Santee Plan is sufficient to demonstrate that emissions at or below the threshold level would result in a less than significant impact."* 4.7-13

O3-15 Please be advised the Santee CA "point system" is not standards-based on the LEED rating system or related in any discernable matter, but a Santee CA hybrid which appears specifically timed and developed to qualify Fanita Ranch for GHG analysis exemption. That same lack of effective GHG mitigation standards and controls has resulted in highly predictable litigation matters. Please note the appearance of possible legal advice to the City of Santee decision-makers delivered directly from its own RDEIR consultant Harris & Associates.  
*"On February 7, 2020, Preserve Wild Santee, Climate Action Campaign, and the Center for Biological Diversity filed a lawsuit challenging the Sustainable Santee Plan (Preserve Wild Santee v. City of Santee, San Diego Superior Court Case No. 37-2020-7331). Although the action remains pending as of the date of this analysis, the filing of a lawsuit does not affect the validity of the Sustainable Santee Plan. As such, the City may continue to rely on the plan for this analysis"* 4.7-12

O3-16 It soon becomes readily apparent that the entire City of Santee entitlement process is constructed upon the City's idiosyncratic and highly self-serving Sustainable Santee Plan. The circular reasoning demonstrated below where the very defects of the Sustainable Santee Plan are converted to arguments for achieving not the standards of CEQA, but unfailingly, the Sustainable Santee Plan.  
*"Mitigation Measures Table 4.7-13 demonstrates consistency with the GHG reduction strategies from the Sustainable Santee Plan with implementation of Mitigation Measures GHG-1, GHG-2, GHG-6, AIR-6 through AIR-8, and TRA-16. As shown in Table 4.7-13, with implementation of these mitigation measures, the proposed project would be consistent with the applicable GHG reduction strategies in the Sustainable Santee Plan, and this impact would be mitigated to a less than significant level."*

**O3-15:** This comment attacks the validity of the Sustainable Santee Plan. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. Please also see response to comment O3-13.

**O3-16:** This comment attacks the validity of the Sustainable Santee Plan. Please refer to response to comment O3-13, which addresses the status of the prior Sustainable Santee Plan litigation.

CEQA requires that an EIR consider whether implementation of a proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As part of the analysis required to respond to that question, Table 4.7-13, Sustainable Santee Plan Community GHG Reduction Strategies (After Mitigation), was included in the EIR to demonstrate that the proposed project, following implementation of the recommended mitigation measures, would be consistent with the applicable reduction strategies of the Sustainable Santee Plan.

03-17	<p>Clearly the City of Santee has anything but a Sustainable Plan because of the reliance on transparent claims of meeting CA GHG standards of this peculiar to Santee "Plan". Even to this day the checklist standards are not complete or clearly defined, with numerous examples of TBD (To Be Determined) point values in this dubious checklist for exemptions to GHG analysis. The highly partisan GHG emission control mechanisms cannot meet CEQA standards and must be 100% resolved in the Final RDEIR or face certain defeat as having indefensible inadequacies that fail the test of factual project description. The glaring generalities below best demonstrate the deficiencies of the <b>Sustainable Santee Plan</b>.</p> <p><i>"The point levels are based upon improvements compared to 2017 emission levels of efficiency. Projects that garner at least 100 points will be consistent with the reduction quantities anticipated in the Sustainable Santee Plan (Plan). As such, those projects that garner a total of 100 points or greater would not require quantification of project specific GHG emissions. Consistent with CEQA Guidelines, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions."</i></p>
03-18	<p>3) <b>Vehicles.</b></p> <p>The RDEIR admits there will be massive increases in Vehicle miles traveled increasing traffic congestion and GHG. The RDEIR states that "Implementation of the preferred land use plan with school would result in 243,266 daily VMT, and the land use plan without school would result in 249,124 daily VMT, annual VMT of 84,413,302 and 86,446,028 for the preferred land use plan with school and land use plan without school, respectively..."</p> <p>The RDEIR concludes that even after mitigation that VMT from this project are "significant and unavoidable after mitigation."</p>
03-19	<p><b>Construction.</b> Construction alone would produce enormous amounts of GHG. The RDEIR will produce Over 37 thousands metric tons of GHG amortized over 30 years to over 1,248 metric tons per year.</p>
03-20	<p><b>Maintenance.</b> The RDEIR correctly concludes that at Fanita Ranch, "Landscape maintenance includes fuel combustion emissions from equipment such as lawnmowers, rototillers, shredders/grinders, blowers, trimmers, chain saws, and</p>

- 03-17:** This comment alleges deficiencies in the Sustainable Santee Plan. Please refer to response to comments O3-12, O3-13, O3-14, and O3-16, which address the proposed project's GHG analysis and the validity of the Sustainable Santee Plan.
- 03-18:** This comment is a summary of the EIR's VMT analysis and the conclusions of that analysis. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- 03-19:** This comment repeats the proposed project's construction GHG emissions. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- 03-20:** This comment repeats the EIR's overview of the proposed project's landscape maintenance needs. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

O3-20 cont.	hedge trimmers.” Use of this equipment represents an undisclosed significant impact to the environment. Unfortunately, the RDEIR makes no claim or promise that landscape equipment would be electric only rather than gas burning appliance. Exhaust Emissions: Leaf blowers alone emit substantial amounts of dangerous exhaust emissions and GHG. Exhaust from leaf blowers contains ozone, carbon monoxide benzene, acetaldehyde, fine particulates, and formaldehyde (California Air Resources board, 2000) to mention but a few. The California Air Resources board reports that leaf blowers produce 145 times as many hydrocarbons (that is 14,500% more, to put it another way) as a light automobile and 7.5 times as much carbon monoxide (or 750% more) than a light automobile. Fossil fuel based landscape equipment is inappropriate in 2020 and represents a dangerous addition to GHG. Sierra Club will always oppose a project with fossil fuel based appliances.
O3-21	
O3-22	Electric use is calculated using current SDGE energy mix which is more polluting than other renewable sources. Unfortunately, Santee has not adopted Community Choice Energy, which could have provided a lower GHG alternative than the current mix. Approval of Fanita Ranch prior to Santee enrolling in a regional Community Choice Energy program is an undisclosed significant adverse impact to the environment Sierra Club urges Santee to adopt Community Choice Energy to provide a lower GHG mix than the current project utilizes.
O3-23	<b>Operation.</b> The RDEIR states, “Table 4.7-8 provides the long-term operational emissions associated with the preferred land use plan that includes development of a school. Implementation of the preferred land use plan with school would result in GHG emissions of approximately 36,105 MT CO <sub>2</sub> e per year, including amortized construction emissions. Per capita emissions would be 4.29 MT CO <sub>2</sub> e and would exceed the threshold of 1.77 MT CO <sub>2</sub> e. This impact would be potentially significant.”
O3-24	Some of the features that are completely unnecessary would contribute to additional greenhouse gas. The inclusion of six open gas fireplaces is unneeded, frivolous, and irresponsible when we are trying to reduce greenhouse gas.
O3-25	Ongoing operation of Fanita Ranch would generate GHG on an ongoing basis. Residential units alone would generate 26,500,000 BTUs annually of natural gas.

- O3-21:** This comment incorrectly states that the EIR fails to address the potential impacts caused by landscaping equipment. Mitigation Measure AIR-10 requires that the applicant or its designee shall provide evidence to the City that the design plans for residential structures include electrical outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.
- O3-22:** This comment discusses the City’s adoption of a Community Choice Energy program. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- O3-23:** This comment repeats the EIR’s conclusions regarding the potential GHG emissions impacts associated with the proposed project prior to implementation of recommended mitigation. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- O3-24:** The comment criticizes the fact that the proposed project would include six open gas fireplaces, but fails to note that Mitigation Measure GHG-4 requires that the proposed project includes all electric homes, thereby prohibiting gas fireplaces in any of the residential units. The six allowed fireplaces, which are limited to the community

areas of the villages by PDF-AQ/GHG-1, were included in the proposed project's pre-mitigation GHG emissions analysis. As explained thoroughly in the EIR, the recommended mitigation measures would ensure that the proposed project reduces all GHG emissions below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR.

- O3-25:** This comment provides the natural gas emissions from the proposed project prior to the implementation of mitigation. This comment overlooks the fact that Mitigation Measure GHG-4 requires that the proposed project include all-electric homes. Tables N and O in Appendix H demonstrate that implementation of this mitigation significantly reduces the energy demand of the proposed project.

O3-26	Once, again natural gas is a greenhouse gas and using it as a power source in 2020 is inconsistent with global, national, state, or regional GHG targets.
O3-27	<b>False Mitigation.</b> Importantly, many of the GHG mitigation measures are not mitigation measures at all, but rather GHG reduction measures (e.g. hedges or bike lanes). These may be commendable but the project as proposed still produces massive amounts of carbon despite these commendable measures. True mitigation would compensate for the additional GHG with measures to reduce it to zero or below. No such mitigation measures are evident in the proposed project.
O3-28	In sum, the RDEIR concludes that, “implementation of the proposed project would result in potentially significant GHG emissions. Therefore, the proposed project would result in a cumulatively considerable impact.” It is unacceptable to approve a project that creates a net increase in GHG rather than a net reduction. This is inconsistent with regional and state climate goals and is entirely unacceptable to Sierra Club.
	<b>4) Traffic</b>
O3-29	San Diego area highways are already beyond capacity and Fanita Ranch would add a large number of trips that would impact city streets in Santee and surrounding cities and produce significant traffic jams on state road.
O3-30	State Route 52 is substantially jammed with stop and go traffic eastbound every weekday evening with corresponding westbound morning traffic overwhelming the capacity of the SR-52. Recognizing this situation the RDEIR states that, “Current levels of congestion in the AM and PM peak periods affect the reliability of service on this freeway and delay travel times. Heavy congestion on SR-52 has a ripple effect on surrounding roadways, degrading conditions and increasing overall congestion in the region.”
O3-31	Future traffic projections indicate that these conditions will worsen unless improvements are implemented on SR-52.” As a result the RDEIR states: “State Route 52: Santo Road to Mast Boulevard: Eastbound PM Peak Hour (Direct and Year 2035 Cumulative). The applicant has privately funded a Caltrans Project Study Report – Project Development Support (PSR-PDS) for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve

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- O3-26:** This comment provides the commenter’s view on natural gas. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- O3-27:** This comment alleges that the EIR includes “false mitigation” and references the inclusion of hedges and bike lanes as examples. Contrary to the comment’s statements, the EIR includes a number of valid mitigation measures, each of which helps ensure that the proposed project reduces all GHG emissions below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR. In addition, please refer to Thematic Response – 2017 Scoping Plan.
- O3-28:** This comment incorrectly states that the EIR concludes the proposed project would result in a potentially significant GHG emissions impact. In fact, the EIR demonstrates that the recommended mitigation measures would ensure the proposed project reduces all GHG emissions below a level of significance as required by CEQA.
- O3-29:** This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Per the explanation in Section 4.16.5, Transportation, Project Impacts and Mitigation Measure, the applicant has privately funded

the PSR-PDS, with an attachment included in the appendix to the Transportation Impact Analysis (Appendix N). Per the PSR-PDS included in Appendix N, the applicant has entered into an agreement with Caltrans to identify operational improvements to SR-52 that are intended to relieve congestion.

- O3-30:** This comment is a summary of the SR-52 impacts and mitigation discussion in the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- O3-31:** This comment is a summary of the SR-52 impacts and mitigation discussion in the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



O3-31 cont. congestion. Caltrans can and should complete its evaluation and implement all feasible improvements along the impacted corridor. Insofar as SR-52 is within the exclusive jurisdiction of Caltrans, the City of Santee is without jurisdiction to implement any such improvements. Therefore, the impact is considered significant and unavoidable. State Route 52: Santo Road to Mast Boulevard: Westbound AM Peak Hour (Direct and Year 2035 Cumulative). The applicant has privately funded a Caltrans Project Study Report – Project Development Support (PSR-PDS) for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. Caltrans can and should complete its evaluation and implement all feasible improvements along the impacted corridor. Insofar as SR-52 is within the exclusive jurisdiction of Caltrans, the City of Santee is without jurisdiction to implement any such improvements. **Therefore, the impact is considered significant and unavoidable.” [Bolding added]**

O3-32 Unfortunately, nowhere in the RDEIR is any description of how improvements to SR-52 will be funded or if such improvements will ever be made. Moreover, with the State of California facing a budget deficit in the tens of billions of dollars it is hard to imagine that any of these improvements to SR-52 will be made in the foreseeable future. Insofar as SR-52 is within the exclusive jurisdiction of Caltrans, the City of Santee is without jurisdiction to implement any such improvements.

O3-33 The RDEIR provides no mention of or increase in public transportation in the vicinity of the proposed Fanita Ranch project. The busses from the proposed transit center would be beneficial but without dedicated bus lanes they would be stranded in even the existing traffic delays, to mention nothing of traffic conditions in benchmark year 2035.

O3-34 In conclusion the impacts to SR-52 are significant, unavoidable, and unmitigable. The result will be increased gridlock on SR-52 with the resulting loss of human time and productivity and increased air pollution and GHG

O3-35 5) **Wildfire**

O3-36 The RDEIR should be commended for recommending more fireproof construction. Unfortunately using building standards are insufficient to prevent fire injuries and losses. In recent fires in California numerous so-called fireproof homes have gone up in smoke. . All of Fanita (excepting Sycamore Creek) is designated Very High Fire Hazard Severity Zone). Placing new residents in known fire hazard zones is

O3-37

**O3-32:** This comment states that the EIR does not provide a description of how improvements to SR-52 will be funded or if such improvements will be made. Per the explanation in Section 4.16.5, Project Impacts and Mitigation Measure, the applicant has privately funded the PSR-PDS, with an attachment included in the appendix to the Transportation Impact Analysis (Appendix N). Per the PSR-PDS included in the appendix, the applicant has entered into an agreement with Caltrans to identify operational improvements to SR-52 that are intended to relieve congestion.

**O3-33:** This comment states that the EIR provides no mention of or increase in public transportation in the vicinity of the proposed project. Section 15.2 of the Transportation Impact Analysis (Appendix N) discusses transit in relation to the project site. The Transportation Impact Analysis did not assume any increase in transit service to the site in the forecasting of project trips the site would generate.

**O3-34:** This comment states the conclusions of the EIR that impacts to SR-52 are significant and unavoidable. Per the explanation in Section 4.16.5, Project Impacts and Mitigation Measure, the applicant has privately funded the PSR-PDS as provided in the appendix to the Transportation Impact Analysis (Appendix N). Per the PSR-PDS included in the Appendix N, the applicant has entered into an agreement with Caltrans to identify

operational improvements to SR-52 that are intended to relieve congestion.

- O3-35:** This comment commends the EIR for recommending more fireproof construction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- O3-36:** This comment states building standards are insufficient to prevent fire injuries and losses. The City requires projects like the proposed project to provide a fire protection system, not simply rely on building standards. Ignition-resistant building standards do perform quite well at protecting structures, particularly when ember-resistant vents are applied, from direct flame ignitions and airborne ember penetration and interior ignition. However, in addition to these requirements, the Fire Protection Plan (Appendix P1) details a fire protection system that includes landscape restrictions, customized fuel modification zones, access to code, fast fire and medical emergency response, water availability to code, ongoing maintenance and monitoring, and funded enforcement. The Fire Protection Plan (Appendix P1) considers the type of fire hazards and risks unique to the site and provides a customized, layered, and redundant system of fire protection features to address them. Please refer to Thematic Response – Fire Protection and Safety for details regarding the fire protection and safety

features required for the proposed project. The result is a project that meets or exceeds applicable codes and is appropriately protected from the fire environment in which it is located.

- O3-37:** This comment recommends the restriction of all development within areas of the project site designated Very High Fire Hazard Severity Zones. Please refer to Thematic Responses – Fire Protection and Safety and Fire Ignition and Risk for a more detailed discussion of how projects can be built safely and risk reduced to acceptable levels within Very High Fire Hazard Severity Zones. It is important to understand that the Very High Fire Hazard Severity Zone designation does not equate to a restriction on development; however, it does require development to incorporate specific protection features, including Chapter 7A of the California Building Code’s ignition-resistant construction materials and methods. Additionally, this comment inaccurately states that numerous structures built to the same ignition-resistance level as those planned for the proposed project have been lost in recent fires. While the homes referred to may have had some ignition-resistant features, they did not include a system of protection, nor did they include ember resistant vents, which are features the proposed project would be required to include. Embers are the leading cause of wildfire-caused structure losses. Ember-resistant vents would drastically reduce potential

- O3-37 cont. | unconscionable. Stronger measures should be taken including the complete restriction of development in Very High Fire Hazard Severity Zone areas which according to the RDEIR exist in several locations in the proposed Fanita Ranch project.
- O3-38 | Wildfire is not a hypothetical concern as in 2003 the Cedar Fire burned through parts or the proposed Fanita development area. The location of the project adjacent to vast open space regional parks in and military lands puts this project at great risk for wildfire.
- O3-39 | Unfortunately, the RDEIR does not address the increased risk of wildfire that exist in California and Santee today. We are in the midst of a prolonged drought that would increase the risk to the Fanita Ranch from wildfire. Additionally, the projection for global warming and climate change mean that the project will be under increased risk during construction and buildout in the upcoming years.
- O3-40 | One particular concern is the Vineyard Village area of the project that is at increased risk due to its elevated topography, making it more vulnerable to fire, and the fact that it is surrounded by flammable chaparral. Worse, many residents of Vineyard Village must travel into to the direction of a Santa Ana driven wildfire before descending off of the Vineyard Village area of Fanita Mountain.
- O3-41 | In fact, evacuation from the entire Fanita Ranch project is infeasible because of the project depends upon the horseshoe configured Cuyamca Street/Fanita Parkway to exit the project onto an already overburdened city circulation system. This is problematic because evacuations may be gridlocked and burned over by fire. Moreover, the evacuation would take place into the existing city of Santee, which could clog streets and see residents competing for the chance for evacuation. Indeed, if wildfire came from the east, as is commonly the case during Santa Anna winds, residents fleeing from Lakeside, Ramona, and El Cajon (and other east county communities) would clog SR 52 and Mast Boulevard would be stopped, a primary evacuation route from Fanita Ranch and the rest of Santee.
- O3-42 | Of great concern is that the RDEIR states that: "The proposed project would require the installation and maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) and would implement fire prevention construction..." This suggests that there will be overhead power lines in the Fanita Ranch Project with the increased chance of

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exposure and structure ignitions, particularly on the project site, where the combined fire protection system would provide large separation between structures and the wildland areas and ongoing maintenance would occur to ensure the intended landscape/ Fuel Modification Zone functions. These designations equate to the need to apply Chapter 7A of the Building Code, which results in ignition resistant exteriors. With the addition of these features, along with the ember-resistant vents and the system of fire protection planned for the proposed project, the development would be appropriately protected and the potential risk would be reduced to acceptable levels.

**O3-38:** This comment states that, due to the proposed project’s proximity to open space regional parks and military lands, the project site is at great risk for wildfire. The commenter is referred to the Thematic Responses – Fire Protection and Safety and Fire Ignition and Risk. The proposed project’s Fire Protection Plan (Appendix P1) has contemplated recurring wildfire and has designed a fire protection system that would appropriately protect the community and its assets.

**O3-39:** This comment states that the EIR does not adequately address the increased risk of wildfire for the proposed project given climate change projections. It is speculative to assume climate change will have a significant impact on fire behavior in Southern

California, specifically given recent research that suggests that there will not be as significant of an impact on Southern California shrublands as is anticipated in the coniferous forests of the Sierra Nevada and Northern California.<sup>1</sup> Indeed, the researchers demonstrated that drier conditions in California's forests will certainly increase potential for large, severe fires there; in Southern California shrublands, however, the impact will be significantly less, owing to the fact that the region already experiences a severe annual drought.

Additionally, if climate change results in a condition that makes it more likely that ignitions will occur, it could potentially cause large areas of chaparral to type-convert into grasslands. In that case, contradicting the comment's assertion that fire hazard and risk would increase, more frequent fires occurring at the project site would cause the shrub vegetation to convert to flashy fuels. Flashy fuel-dominated landscapes may be more prone to ignitions, but the resulting wildfires would be less intense and produce much lower flame lengths than shrub fuels, on the order of three to five times or more shorter flame lengths and fire intensity. Therefore, the comment confuses the long-term impact of climate changes and refutes previously referenced research that indicates that impacts in Southern California shrublands are expected to be significantly less than in higher elevations.

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<sup>1</sup> Keeley, J., and A. Syphard. 2016. "Climate Change and Future Fire Regimes: Examples from California." *Geosciences* 6:37. 14pp.

**O3-40:** This comment states a specific area of concern is the Vineyard Village of the proposed project given its elevated topography, surrounding vegetation, and direction of egress toward a Santa Ana-driven wildfire. The Vineyard Village has been planned to be appropriate for the fire environment in which it is located. Fuel Modification Zones have been increased by 50 percent to account for the chaparral occurring on some of the slopes below the development area. All of the required ignition resistant features are planned for this site, and ember-resistant vents would be mandated, which would result in a hardened village that addresses the higher hazard and reduces risk to acceptable levels. Please refer to Thematic Response – Fire Protection and Safety for more information regarding how the proposed project is protected from anticipated fire events.

Regarding evacuation, the comment expresses confusion regarding the evacuation routes for Vineyard Village residents by suggesting that evacuees would need to drive into a Santa Ana wind-driven fire. While it is true that a small percentage of residents would travel a short distance to the east/northeast, they would be completely within the development footprint, essentially a protected corridor, and not exposed to wildland fuels, to access the evacuation route. Once on the evacuation route, residents would travel west (away from an approaching Santa Ana wind-driven fire) and then south out of the

area. Please refer to the Thematic Response – Evacuation for more information on how evacuations are planned and implemented in the City of Santee and the County of San Diego.

- O3-41:** This comment states evacuation of the proposed project is infeasible due to an already overburdened City circulation system, as well as an increased burden from residents of neighboring communities who may also need to evacuate using the proposed project’s primary evacuation routes, SR-52 and Mast Boulevard. Evacuations are fluid events that require real-time information and the ability to change approaches in a short time frame. San Diego County Sheriff’s Department, Office of Emergency Services, fire agencies, and all related agencies and organizations have a long track record of successful, large evacuations, and hundreds of millions of dollars have been invested in emergency-aiding technology and resources toward provisions for safe evacuations. The commenter’s opinion that the provided and existing road system would be inadequate for evacuation is not supported by data. The commenter is referred to Thematic Response – Evacuation regarding how evacuations are planned and implemented in the City of Santee and County of San Diego.
- O3-42:** This comment states that the EIR suggests that the proposed project would install overhead power lines that could increase the risk of wildfire on the project site, and

O3-42 cont. wildfire starting within the projects. Regrettably, there is no mention of underground power lines in the RDEIR. What is the status of power lines to be constructed to serve the project?

O3-43 **Conclusion.** According to the RDEIR, “The project would result in potentially significant impacts that would be reduced to less than significant with implementation of mitigation measures related to: i) air quality; ii) biological resources; iii) cultural and tribal cultural resources; iv) geology and soils (including paleontological resources); v) greenhouse gas emissions; vi) hazards and hazardous materials; vii) noise; and viii) transportation.” **Sierra Club San Diego finds the RDEIR is fatally flawed by a lack of substantial evidence to support conclusions of “less than significant” impacts in the areas cited above. Sierra Club San Diego is opposed to the Fanita Ranch Project, in part, because irreversible significant adverse impacts to biological resources, climate, transportation and public safety remain.**

Most sincerely,

Dr. Peter Andersen  
Sierra Club San Diego  
Vice Chair, Conservation Committee

George Courser  
Sierra Club San Diego  
Chair, Conservation Committee

inquires about the status of power lines to be constructed for the proposed project. The proposed project would underground all power lines, as stated in Appendix P1, Fire Protection Plan, specifically Section 3, No. 3. The passage regarding power lines that the comment quotes is actually a significance threshold question used to assess whether a project may introduce potential fire ignition sources. As previously stated, in Appendix P1, specifically Sections 3 and 6.2.17, all power lines would be underground and would not be a potential ignition source.

**O3-43:** This comment contains inconsistent statements regarding information provided in the EIR. The EIR provides substantial evidence to support its findings, as demonstrated in Sections 4.1 through 4.18. As summarized in Section 1.0 Executive Summary, Table 1-1, Proposed Project Environmental Impacts and Mitigation Measures, the EIR provides mitigation measures that would reduce impacts to biological resources; cultural and tribal cultural resources; geology, soils, and paleontological resources; GHG emissions; and hazards and hazardous materials to below a level of significance. The EIR also provides mitigation measures that would reduce some, but not all, impacts to air quality, noise, transportation, utilities and service systems, and recreation. Please refer to responses to comments O3-2 through O3-42.



## Comment Letter O4: California Chaparral Institute, July 13, 2020



**O4**

July 13, 2020

Chris Jacobs  
 Department of Development Services  
 Santee City Hall, Bldg 4  
 10601 Magnolia Ave  
 Santee, CA 92071

**RE: Fanita Ranch Project Draft Revised EIR**

Dear Mr. Jacobs and the Department of Development Services,

O4-1

If the Fanita Ranch Project is approved as described in the current Draft Revised EIR (DREIR) and the associated Fire Protection Plan (FPP), the city of Santee will be repeating the same fatal mistake made by other jurisdictions that have built neighborhoods in extremely dangerous firesheds – that wood frame structures and over-extended fire agencies will be able to defeat the awesome power of a wind-driven firestorm.

O4-2

**The proposed Fanita Ranch development and the historical fire patterns are eerily similar to the Fountaingrove II development in Santa Rosa, California.**

In the mid-1990s, the city of Santa Rosa ignored its own planning rules, specifically an ordinance restricting ridgeline/hillside development, and approved the Fountaingrove II subdivision. The city also ignored significant testimony provided during the public comment period that the proposed development was placing people in harm's way due to high fire risks.

O4-3

The exact area where the Fountaingrove community was to be built had been burned in two ferocious, wind-driven firestorms: The Great Fire of 1870 and again in the 1964 Hanly Fire.

In 2001, the Santa Rosa Department of Community Development Planning Division (Regalia et al. 2001) reviewed past planning decisions and specifically cited the Fountaingrove II development as a "less successful product" due to **issues that can be applied to the Fanita Ranch DREIR/FPP,**

- Loose interpretations of the General Plan goals and policies.
- Poorly prepared environmental analyses which ignored the significance of facts and findings.

[www.californiachaparral.org](http://www.californiachaparral.org)

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**O4-1:** The comment claims that if approved, the City would be making a fatal mistake. The opinion expressed by the commenter is noted but lacks substantiation by supporting data. The proposed project's Fire Protection Plan (Appendix P1) provides a detailed and robust fire protection system that is similar to but more robust than other master planned communities' systems that have performed very well when faced with wildfire (e.g., Cielo in Rancho Santa Fe, 4S Ranch in San Diego, Serrano Heights in Anaheim Hills, Stephenson Ranch in Valencia, and others). No further response is required.

**O4-2:** This comment states that the proposed project in Santee, California, is similar to historical fire patterns in Santa Rosa, California. Please refer to Thematic Responses – Fire Protection and Safety and Northern California Contrast for comprehensive descriptions of these important topics. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O4-3:** This comment compares the City of Santa Rosa's conclusion regarding the Fountaingrove II development, specifically loose interpretations on general plan goals and policies, poorly prepared environmental analysis,

O4-3  
cont.

- Erroneous conclusions that generated vague conditions and requirements.

O4-4

During October, 2017, the Fountaingrove community was devastated by the Tubbs Fire that killed 22 people and burned 5,643 structures, **despite the fact that many of the homes had fire safety features and surrounding fuel treatments – not unlike those referenced in the Fanita Ranch Project DRIER.**

O4-5

In San Diego County, the wind-driven 2003 Cedar Fire swept across the exact same location of the proposed Fanita Ranch development. As with Santa Rosa, the community of Santee has been provided a clear warning of the risks of building in an area with a history of being vulnerable to high-intensity firestorms.

We urge the city of Santee to heed that warning.

O4-6

The proposed development fails to properly incorporate key scientific findings on the influence of human communities on wildfire (e.g. Syphard et al., 2007), recorded observations of recent and historical wildfire event patterns both within and surrounding the proposed site (e.g. Keeley et al. 2006, Keeley et al. 2009), and the public interest in preserving the aesthetic beauty of native ecosystems, and of protecting the individual rights to life, liberty and property for the proposed development's future occupants.

As stated by fire ecologist Jon Keeley (2017) in light of the Tubbs Fire that devastated Santa Rosa:

As of late October, more than a dozen wildfires north of San Francisco had killed more than 40 people, burned approximately 160,000 acres and destroyed more than 7,000 structures.

This tragic loss of life and property is unprecedented in California. However, the fires are not anomalous events in terms of their size, intensity or the speed with which they spread. Indeed, the path of the destructive Tubbs fire in Napa and Sonoma counties mirrors that of the Hanly fire of 1964. This extreme wind-driven fire burned under similar conditions, across much of the same landscape and covered an area substantially greater than the recent Tubbs fire.

O4-7

Strikingly, though, no lives were lost during the Hanly fire and only 29 structures were destroyed. Why did these two fires, 50 years apart, burn on the same general landscape, under similar extreme winds, with such different human impacts? Fire scientists will study these events intensively to parse out the relative importance of various factors. But it is clear that two factors probably were major contributors: wind and population growth.

Keeley expands on the latter of the two factors in a way that emphasizes how the increase in population growth and urban expansion are related to the increase of extreme fire events in duration and severity:

and erroneous conclusion that generated vague conditions and requirements, to the proposed project. The comment provides the commenter's opinion and background information for a Northern California community. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O4-4:** This comment cites the number of deaths and damaged structures that resulted from the 2017 Tubbs Fire, which occurred in the Fountaingrove II community, and compares the proposed project's safety features and fuel treatments to those prescribed for the Fountaingrove II development. The comment incorrectly states that the fire protection features provided in the Fountaingrove II development are similar to those proposed for the proposed project. The Fountaingrove II development was built in the early 2000s and included basic exterior features that help protect against direct flame and heat contact. However, the Fountaingrove II development did not have ember-resistant vents, a critical component to protection structures from wildfire. This was the reason these homes were lost. Please refer to the Thematic Response – Northern California Contrast for more details on why the 2017 Tubbs Fire and other Northern California fires are not appropriately compared to the proposed project. Please also refer to Thematic Response

– Fire Protection and Safety for details on the fire protection system required for the proposed project, and note that these same requirements were not in place in the Fountaingrove II development. The protection of the proposed project’s residents and assets was comprehensively analyzed and adequately addressed in the EIR. No further response is required.

**O4-5:** This comment states that the 2003 Cedar Fire occurred on the project site, which demonstrates the risks associated with building in an area that has a history of fire. As detailed in the Fire Protection Plan (Appendix P1), and in the comment, the analysis considered the area’s fire history and fire behavior based on site-specific fire environment inputs among the comprehensive fire environment assessment factors. Based on that fire history, Section 2.2.7 of the Fire Protection Plan (Appendix P1) states that the site will experience wildfire again, and because of that, the proposed project has incorporated design features that have demonstrated minimizing wildfire exposure and impacts to persons and property. Many wildfires occur within the same footprints that they occurred previously, largely because there are available vegetative fuels to facilitate fire spread. For example, the 2017 Tubbs Fire followed in almost the exact same footprint as the 1964 Hanley Fire. What differed from 1964 and 2017 was the number of fire-prone homes that were built in the area.

Had these homes been built with fire-resistant materials, such as those required by Chapter 7A of the California Fire Code, and included the ember-resistant vents the proposed project would be mandated to use, it is highly unlikely that the level of devastation would have been the same. Please refer to the Thematic Response – Fire Protection and Safety for additional details regarding the wildfire protection features customized for the proposed project. The comment raises no new issues that have not been adequately addressed in the EIR. No additional response is necessary.

- O4-6:** This comment states the proposed project does not incorporate key scientific findings on the influence of human communities on wildfire, recorded observations of recent historical wildfire event patterns, the public interest in preserving the aesthetic beauty of native ecosystems, and protecting individual rights to life, liberty and property. Please refer to Thematic Response – Ignition and Risk regarding the referenced research on human influence. The research cited and additional work by the referenced authors does not specifically consider the types of fire protection features required for the proposed project, and in fact, indicate that these features significantly reduce risk. The comment raises no new issues that have not been adequately addressed in the EIR. Therefore, no additional response is necessary.

O4-7 cont.	<p>Population growth also spurs urban expansion. Development has spread outward, positioning people closer to watersheds of dangerous fuels. These fires burned through grasslands, oak woodlands and dense stands of chaparral shrublands that last burned 50 years ago. Diablo winds are often funneled by particular topographic features, such as low-lying passes in mountains. This makes some parts of the landscape, which fire experts refer to as wind corridors, more vulnerable than others.</p> <p>Because the Fanita Ranch Project is situated in a designated Very High Fire Hazard Severity Zone (VHFHSZ), the approval of this project would simultaneously constitute approving the, "positioning [of] people closer to watersheds of dangerous fuels."</p>
O4-8	<p>Although the DREIR attempts to minimize the risks of putting people in harm's way, it fails to seriously consider the impact of the kind of fires that causes nearly all the fatalities and all the damage – those that are wind-driven.</p> <p>For example, it claims that Fire Management Zones (FMZs), <i>"when properly maintained, have proven effective at minimizing structure ignition from direct flame impingement or radiant heat, especially for structures built to the latest ignition resistant codes."</i></p> <p>In southern California firestorms, direct flame contact is rarely the cause of home ignition. It's the embers, propelled by strong winds far ahead of the fire front, that pose the greatest risk.</p> <p>A major study of the 2007 Witch Creek Fire in San Diego County concluded that,</p> <p style="padding-left: 20px;"><i>"Wind-blown embers, which can travel one mile or more, were the biggest threat to homes in the Witch Creek Wildfire. <b>There were few, if any, reports of homes burned as a result of direct contact with flames</b>"</i> from wildland fuels (IBIIS, 2008).</p>
O4-9	<p>The installation of interior sprinklers as referenced in the DREIR further indicates the failure of the document to properly address wildland fire risks. While interior sprinklers can save lives, they do nothing to prevent the ignition of homes from exterior ember rain.</p> <p>This is why every livable structure within a VHFHS Zone should be required to have a complete exterior sprinkler system. Such systems have been proven to reduce home ignition significantly (CCI 2018). Interior sprinklers are designed to protect people from interior structural fire, not wildland fire.</p>
O4-10	<p>The 7/13/2020 comment letter on the DREIR from Preserve Wild Santee offers additional reasons why the DREIR is inadequate and fails to address the danger of wildfire. We strongly concur with and support those comments.</p>

**O4-7:** This comment quotes fire ecologist Jon Keeley and states the approval of the proposed project would put individuals closer to dangerous fuels. This comment continues the comparison of the 2017 Tubbs Fire in Northern California, where fire-vulnerable homes that were not built to the ignition- and ember-resistant levels of that required in the City were lost. Please refer to response to comments O4-5 and O4-6 for additional details regarding the differences between these fire environments and that of the proposed project. Please also refer to Thematic Responses – Fire Protection and Safety and Northern California Contrast for comprehensive descriptions of these important topics. This comment raises no new issues that have not been adequately addressed in the EIR. Therefore, no additional response is necessary.

**O4-8:** This comment states that the proposed project's Fire Protection Plan (Appendix P1) does not evaluate the cause of nearly all fatalities and damages associated with fires, specifically windblown embers. The comment appears to ignore the numerous references to and analysis of airborne embers in the Fire Protection Plan (Appendix P1) that identify this wildfire issue as one of the priority concerns for protection structures. Flying embers, along with other potential fire threats to the proposed project structures, have been evaluated and addressed/disclosed in the Fire Protection Plan (Appendix P1). For example,

embers are mentioned 270 times in the Fire Protection Plan, including in Section 6.4.1, where it states that embers are one of two primary concerns for the site's structures. Because the comment provides inaccurate information and ignores the EIR's extensive analysis regarding airborne embers, the comment raises no new issues and requires no additional response.


- O4-9:** This comment states that all inhabitable structures in the VHFHSZ should include both interior and exterior sprinkler systems. While exterior fire sprinklers may have some application in forested areas to protect individual homes and buildings, they have not been considered for application on a master planned community like the proposed project because they are not necessary. Per Thematic Response – Fire Protection and Safety and the Fire Protection Plan (Appendix P1), the potential fire issues regarding direct flame impingement, radiant and/or convective heat, and airborne embers are all addressed through the fire protection system. Interior fire sprinklers are effective, and contrary to the comment's downplaying, are very effective as a redundant back up should an ember blow into a house from an inadvertent window that was left open. Interior sprinklers are out of the weather, in controlled spaces, and are easily tested. Exterior sprinklers would require high maintenance, regular testing and inspection, and are not tested and approved

O4-11

The California Chaparral Institute has endeavored over the past 15 years to assist communities to adapt to California's fire prone environment. After analyzing the proposed Project, we have concluded that it fails to make the adaptations needed to create a community that is appropriate, and safe, for our region.

Therefore, we urge the city of Santee to reject the DREIR. After seriously examining the comments provided by Preserve Wild Santee and others, and considering the unavoidable impacts caused by added population density and increased fire risk, denial of the Project is the only safe, reasonable outcome.

Sincerely,



Richard W. Halsey  
Director  
The California Chaparral Institute

**Cited References:**

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Keeley, J. E., H. Safford, C. J. Fotheringham, J. Franklin, and M. Moritz. 2009. The 2007 southern California wildfires: lessons in complexity. Journal of Forestry 107:287-296.

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Regalia, C. R. Allen, M. Rich, B. Smith, and C. Parkinson. 2001. Hillsides and Ridgelines, A Survey and Analysis of Hillside and Ridgeline Subdivisions in Santa Rosa, Santa Rosa Department of Community Development Planning.

for this application, besides being unnecessary to protect master planned community structures. Where they are effective, on individual homes that lack appropriate ignition and ember resistance and fuel modification zones, they may be a consideration as they would provide a level of protection and compensation for the vulnerabilities. This comment provides an opinion regarding additional fire protection that is not justified or necessitated at the site. It raises no new issues that have not been adequately addressed in the EIR. Therefore, no additional response is necessary.

**O4-10:** This comment references Comment Letter O7 (Preserve Wild Santee, July 13, 2020), and states support for the comments made in that letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Please refer to responses to Comment Letter O7, which address the issues raised in this comment.

**O4-11:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

Syphard et al., 2007. "Human Influence on California Fire Regimes" in *Ecological Applications*, 17(5), 2007, pp. 1388–1402.



## Comment Letter O5: California Native Plant Society, July 13, 2020

### California Native Plant Society

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July 13, 2020

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**RE: Draft Revised Environmental Impact Report for the Fanita Ranch Project**

Dear Mr. Jacobs,

Thank you for the opportunity to comment on the Fanita Ranch Project ("Project") and the draft revised Environmental Impact Report ("DREIR"). 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. It would have been ideal to see a full site conservation alternative. One should be analyzed that considers funding mechanisms for such conservation. Unfortunately, that was not considered. Nor was the environmentally superior alternative suggested in the NOP letter sent by CNPSSD in 2018. That alternative would have met California's drive to go carbon neutral by 2045 and seriously addressed the conservation and fire issues as well.

As it stands, CNPSSD strongly supports the No Project alternative. While there is certainly demand for affordable housing in San Diego County, there appears to be comparatively little demand for the high end, low density housing proposed here. Worse, this is a retrofuturistic development designed for a 20<sup>th</sup> Century vision of the future. The Project fails to take seriously current legislative and regulatory guidance on issues including climate change, wildfires, or loss of wild species, so it is not useful going forwards.

Our specific issues with native plants, wildfire, and climate change are detailed below. Questions are **bolded** so that they can be found and properly answered.

**Plant Issues**

The plant survey methodology and data are, unfortunately, inadequate.

First, for most sensitive plant species, the last survey was in 2004, a year after the Cedar Fire. **In the sixteen (16) years from that date, how many plants have either died or come up? Especially annuals? Have species disappeared? Or grown?** Given the devastating dry

**O5**

**O5-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O5-2:** This comment states that the proposed project footprint would constrain public safety and public resources and asks that a full conservation alternative be analyzed. In addition, the comment states that an environmentally superior alternative suggested by the California Native Plant Society (CNPS) in a Notice of Preparation (NOP) letter in 2018 was not considered. The EIR analyzes five alternatives selected for evaluation to represent a reasonable range of potentially feasible alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the proposed project in accordance with CEQA Guidelines, Section 15126.6. A full conservation alternative would fail to meet all the project objectives and not comply with the aforementioned CEQA Guidelines. The environmentally superior alternative requested in the CNPS 2018 NOP letter details an alternative "that focuses on a single, compact development, 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.” The EIR analyzed a similar alternative, the Modified Development Alternative, in which development would be compacted in the southern half of the project site, minimizing the brush management perimeter. This issue is adequately addressed in the EIR. The EIR analyzes the biological resources (Section 4.3), greenhouse gas emissions (Section 4.7), and wildfire (Section 4.18) impacts of the proposed project and mitigates all impacts to less than significant in compliance with CEQA Guidelines, Section 15126.4. In addition, please refer to Thematic Response – 2017 Scoping Plan regarding this topic.

- O5-3:** This comment states that the commenter supports the No Project Alternative and an opinion that there is little demand for high-end, low-density housing. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- O5-4:** This comment states an opinion that the proposed project is designed for a twentieth century vision of the future and that it fails to take seriously the current legislative and regulatory guidance on issues including climate change, wildfire, or loss of wild species. The City of Santee (City) disagrees with the second portion of the comment. The EIR considers all applicable legislative and regulatory guidance. In compliance with CEQA, the

EIR analyzes all environmental impacts in accordance with CEQA Guidelines Appendix G questions related to Section 4.7, Greenhouse Gas Emissions; Section 4.18, Wildfire; and Section 4.3, Biological Resources. Every EIR section includes a regulatory framework discussion to illustrate the most current and relevant legislation.

- O5-5:** The comment states that the survey data from 2004 for special-status plants is inadequate and questions how many plants have died and/or grown in the following 16 years given the drought conditions over that time. The comment suggests that there are potentially fewer species/individuals left to be impacted than were recorded in 2004.

As described in Section 4.3.1.4, Sensitive Biological Resources, through discussions between the City and resource agencies, it was determined that the 2004 plant surveys were useful for analysis purposes because they occurred right after the Cedar Fire, which burned years of debris, allowing the ground to be the most visible it could be; appropriate rainfall during the winter following the fire allowed for good growth of these species; and periods of subsequent growth of non-native annual grasses combined with drought left the project site in a current condition that was densely covered by a debris layer that created poor survey visibility. It was determined that follow-up surveys would likely result in

05-5 cont. years San Diego has gone through, it is entirely possible that there are fewer sensitive plants left to be impacted. Or there may be more. Data from a 16 year-old survey is inadequate for decision making. **Why use it? How much would it have cost to survey between 2018 and 2020?**

05-6 Second, not all areas were surveyed. From Appendix D, p. 64-66, there are no surveys performed for survey areas 27 and 28. **Why were these not surveyed?** Additionally, the map of survey areas (Appendix D page 583) shows two section 22s that are not contiguous and multiple unlabeled survey areas around Survey Area 21. **Why trust the numbers when the surveys did not cover entire area impacted, and the map shows unlabeled survey areas?**

05-7 Third, aside from the question of whether any sane human being would accept 16 year-old data on annual plant numbers as accurate for the present moment, not all plants were counted or surveyed for. The cavalier dismissal of surveying for listed *Brodiaea filifolia* in appropriate habitat, while *Brodiaea orcuttii* (CRPR List 1B.2) was surveyed for, is questionable.

05-8 Unfortunately, the date of the focused survey for *Brodiaea orcuttii* was not recorded in the DREIR. **Why not? How many other focused surveys were performed? What were their results?**

05-9 A more important example is *Selaginella cinerascens* (CRPR list 4.2) for which the number given was "Not mapped due to low ranking and prevalence on the project site" (p. 4.3-43). Immediately below it is the San Diego County *Viguiera* (incorrectly identified as *Viguiera laciniata*, a name not used in over a decade). 2,051 members of this CRPR list 4.2 plant were counted. The effort on the *Selaginella* is not just lazy, it was detrimental to the survey. **Why was its distribution not at least mapped?**

05-10 The lack of surveys for the CRPR list 1B and extremely rare liverworts *Geothallus tuberosus* and *Sphaerocarpos drewei* is the reason that the lack of data on *Selaginella cinerascens* is such a shame. The species often grow together, and knowing where the *Selaginella* grew would have simplified the search for the rare liverworts. I know what they look like, as I've found *Geothallus* in the wild, and it was not possible to survey for it in 2004. Prior to 2017, there were no photographs of *Geothallus*, and the habitat description for both was incorrect. Moreover, they are only visible during the winter, from December to March, when the ground is wet following soaking rains, and they do not come up every year.

05-11 Despite my request in NOP comments to survey for these species (2019-2020 was a banner season), despite my working with Dudek botanists to show them how to identify *Geothallus* and its habitat, despite noting that *Geothallus* had been reported nearby (Appendix D, p. M-16), it was not searched for. *Sphaerocarpos drewei* was reported as "This species would have been observed during surveys and is recorded in coastal areas in San Diego County," despite the fact that it is thumbnail sized, its habitat partner (*Selaginella*) was not even mapped, and plant surveys were not performed at the correct time of year.

05-12 **Why were the rare plant surveys so sloppy?** Dudek is one of the only firms that has (or had) botanists trained to identify *Geothallus*, and the survey would have taken a day or two, especially if the populations of *Selaginella* had been mapped. **Why not survey for *Geothallus*? What else was missed by only surveying in the spring, and not in the summer, fall or during the rains?**

05-13 Then there are issues with the biological mitigation measures. .  
For Mitigation Measure BIO-2, please clarify the following statement: (p. 4.3-81 ff): "If temporary impact areas are not considered appropriate for restoration of the sensitive native plant community that originally was mapped in that area, these areas shall be considered permanently impacted and mitigated in conformance with mitigation ratios for permanent impacts to sensitive

fewer detections; therefore, the 2004 surveys were considered to be the most conservative existing dataset and were used for analysis. Although comprehensive surveys for special-status plants were not conducted in 2016 (surveys focused only on willowy monardella where observations had been previously recorded), spot-checking previously detected locations confirmed continued presence of populations (See Section 4.5.2, Special-Status Plants of Appendix D, Biological Resources Technical Report).

**05-6:** The comment states that survey areas 27 and 28 were not surveyed for special-status plants and that this is described in Appendix D, pages 64–66.

The comment is referring to Table 3-1 in Appendix D, Biological Resources Technical Report, which includes survey conditions for rare plant survey areas 1–26. The rare plant survey was broken down into 26 survey areas that covered all on-site areas of the project site. The rare plant survey only included 26 survey areas. It should be noted that also included in Table 3-1 are the 28 survey areas for Quino checkerspot butterfly (*Euphydryas editha quino*), but these are unrelated to the 26 rare plant survey areas. There are 13.44 acres of off-site impacts that were not surveyed for special-status plants, but in accordance with Mitigation Measure BIO-6, the area would be surveyed prior to construction and avoidance,

minimization, and mitigation would be required if special-status plants were found.

- O5-7:** With respect to plants, the comment states that on page 583 in Appendix D, the map shows two section 22's and multiple unlabeled survey areas around Survey Area 21. The comment infers that this means the entire site was not surveyed for special-status plants.

First, Appendix D, Biological Resources Technical Report, page 583, is a focused survey report for Quino checkerspot butterfly and is not related to special-status plants. Second, all on-site areas on the project site were surveyed for special-status plants as discussed in Section 3.2.5, Special-Status Plant Species, of Appendix D. There are 13.44 acres of off-site impacts that were not surveyed for special-status plants, but in accordance with Mitigation Measure BIO-6, the area would be surveyed prior to construction, and avoidance, minimization, and mitigation would be required if special-status plants were found.

- O5-8:** The comment states that thread-leaved brodiaea (*Brodiaea filifolia*) was not surveyed for during the special-status plant survey. The comment also states that the survey dates for Orcutt's brodiaea (*Brodiaea orcuttii*) were not recorded in the EIR. The comment continues and asks how many other focused surveys were performed and what their results were.

Surveys for thread-leaved brodiaea were conducted during the blooming period for the species, but none were observed. The focused surveys conducted on the project site are described in Section 3.2 of Appendix D, Biological Resources Technical Report. The dates of each special-status plant survey are included in Table 3-1 in Section 3.1 of Appendix D, Biological Resources Technical Report.

The EIR summarizes site-specific surveys in Section 4.3.1.1, Biological Survey Methods. As described therein, a substantial amount of field studies were conducted, including over 760 person days of site-wide and focused surveys on the project site, including a focused survey exclusively for willow monardella (*Monardella viminea*), rare plants (40 person-days) and eight sensitive wildlife species, including Quino checkerspot butterfly (413 person-days), burrowing owl (*Athene cunicularia*; 17 person-days), coastal California gnatcatcher (*Polioptila californica californica*; 118 person-days), least Bell's vireo (*Vireo bellii pusillus*; 10 person-days for riparian birds collectively), southwestern willow flycatcher (*Empidonax traillii extimus*), coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; 3 person-days), San Diego fairy shrimp (*Branchinecta sandiegonensis*; 40 person-days for fairy shrimp collectively), Riverside fairy shrimp (*Streptocephalus woottoni*), Hermes copper

butterfly (*Lycaena hermes*; 75 person-days plus 15 person-days in 2020), and western spadefoot (*Spea hammondi*; 3 person-days plus the U.S. Geological Survey survey). In addition, previous wetland jurisdictional delineations (22 person-days plus additional surveys in 2020) were updated and verified. These surveys are further described in Section 3, Survey Methodologies, of Appendix D, Biological Resources Technical Report. Survey results are presented in Section 4.3.1.2, General Biological Survey Results; Section 4.3.1.3, Jurisdictional Aquatic Resources; Section 4.3.1.4, Special Biological Resources; and Section 4.3.1.5, Wildlife Corridors and Habitat Linkages, in the EIR.

- O5-9:** The comment questions why ashy spike-moss (*Selaginella cinerascens*), a California Rare Plant Rank (CRPR) 4.2, was not mapped during special-status plant surveys, when San Diego County viguiera (*Viguiera laciniata*), also a CRPR 4.2, was mapped. As stated in Section 5.1.2 of Appendix D, Biological Resources Technical Report, the CRPR List 4 species mapped on site are fairly common in that area of the County of San Diego (County) and are not considered significantly rare. Impacts to the CRPR List 4 species observed in the study area were not considered significant. Thus, impacts to ashy spike-moss are not considered significant. As noted in Appendix D, Biological Resources Technical Report, Table 5-3, Summary of Direct Impacts to Special-Status

Plant Species within the Project Area, due to their prevalence on site and the fact that the species has a CRPR of 4, ashy spike-moss was not mapped. San Diego County viguiera was mapped because, at the time, there was consideration of seeking coverage for it under that Draft Santee MSCP Subarea Plan due to the apparent numbers on site. Other CRPR List 4 species (San Diego sagewort [*Artemisia palmeri*], small-flowered morning-glory [*Convolvulus simulans*], Palmer's grapplinghook [*Harpagonella palmeri*], graceful tarplant [*Holocarpha virgata* ssp. *elongata*], California adder's tongue [*Ophioglossum californicum*], chaparral rein orchid [*Piperia cooperi*], and Engelmann oak [*Quercus engelmannii*]) were mapped due to their rarity on site. Thus, the lack of mapping the precise occurrences does not affect the significance analysis under CEQA.

- O5-10:** The comment states that it was not possible to survey for Campbell's liverwort (*Geothallus tuberosus*), a CRPR List 1B species, in 2004 because, prior to 2017, there were no photographs of the species and the habitat descriptions that existed at that time were incorrect. Additionally, Campbell's liverwort and bottle liverwort (*Sphaerocarpos drewei*), also a CRPR List 1B species, are only visible from December to March, outside of the 2004 survey window.

The comment, when providing input on the County Otay Ranch Village 14 and Otay Ranch Village 13 EIRs, as



with this comment, notes that there had been misinformation given by CNPS regarding what constituted suitable habitat for Campbell's liverwort. The comment then describes both species as occurring on undisturbed cryptogamic crusts and old, open chaparral, and perched water tables (CNPS 2018, 2019). Perched water tables on the project site only occur in the valley where the vernal pools and other ponded features are located—none of these occur within old, open chaparral or chaparral at all. As noted in Appendix M of the Biological Resources Technical Report (Appendix D), the assessment in the potential to occur table for these species was that they had low potential to occur. Regardless, two biologists who were trained to identify Campbell's liverwort by the commenter surveyed in and near the vernal pool areas in April 2020 while obtaining additional wetland delineation data on the vernal pools (see Dudek, USACE 2020 for a subset of the U.S. Army Corps of Engineers Aquatic Resource Delineation Report for the proposed project). The 2020 surveys were performed during a second wet pulse, and conditions were suitable for detection (i.e., saturated) throughout the survey period. Surveys included vernal pools and other basin-like depressions in the largest concentration of the highest quality natural pools on the project site (see Figure 5 in Dudek, USACE 2020). The two liverwort species were not incidentally observed during the 2020 survey effort in these more suitable portions of

the project site. It should also be noted that, since their training on Campbell's liverwort, these biologists have identified new occurrences of this species in the County, including naturally recolonizing occurrences at a vernal pool restoration site that was entirely recontoured. Based on the negative results in the vernal pool area on the project site and lack of perched water elsewhere, the low potential to occur conclusion remains unchanged.

Finally, 14 CCR Section 15204 provides, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters." The adequacy of an EIR is determined in terms of what is reasonably feasible.

**O5-11:** The comment questions why surveys for Campbell's liverwort were not conducted. See response to comment O5-10.

**O5-12:** The comment questions if special-status plants would be missed by surveying in the spring and not in the summer or fall. Appendix M of Appendix D, Biological Resources Technical Report, evaluates the potential for each special-status plant species known to occur in the surrounding region whether or not they were detected during the surveys.

All of the special-status plants that are known to occur within the vicinity of the proposed project and bloom in fall or summer are either (1) not expected to occur or

have a low potential to occur for reasons such as no suitable vegetation is present, suitable soils are not present, the site is outside of the known elevation range of the plant, or it is outside of the geographic range of the species (i.e., the plant occurs on the coast), or (2) the plant would have been observed if present because it is a shrub that is detectable during the survey time frames.

- O5-13:** The comment questions what would happen to the 145.51-acre surplus of land in the Habitat Preserve if restoration of vegetation communities is successful. The comment also questions what would happen if more than 145.51 acres is permanently impacted by accident.

The 145.51-acre surplus land in the Habitat Preserve would remain conserved regardless of whether or not it is used to compensate for temporary impacts.

The second part of the comment's question is unclear. It should be noted that all permanent and temporary impacts resulting from project implementation to sensitive vegetation communities would be mitigated according to the ratios determined in the Draft Santee MSCP Subarea Plan, and impacts would be reduced to a less than significant level in accordance with CEQA. Additionally, the 145.51-acre surplus of lands in the Habitat Preserve would only be used to mitigate for temporary impacts if in-place restoration is not

05-13 cont. upland vegetation communities as outlined in Mitigation Measure BIO-1, Preserve Management Plan. There is currently a surplus of approximately 145.51 acres in the Habitat Preserve that would be available to accommodate these additional impacts if deemed necessary.” **Specifically, what happens to the surplus 145.51 acres if restoration is successful on the temporary impact areas? What happens if, despite the planning, more than 145.51 acres are permanently impacted by accident?**

05-14 With Mitigation Measure BIO-3 (narrow endemic plant species), it seems reasonable to follow the Draft Santee MSCP Subarea Plan (DSSP). **How will these mitigation measures be applied in an enforceable way if the DSSP is never approved, or altered in a way that removes or changes language that disputes the conclusions formed in this DREIR, on how the mitigation measures will be implemented and effective?** This is not an idle question. The North County MSCP has been in process for over 20 years, with multiple drafts, and the species list is still in flux. The plants covered by mitigations for this Project need to have definite mitigations planned, not something tied to a draft plan.

05-15 The issues with Mitigation Measure BIO-4 are boring beetles, the slow maturation rates of oaks, and climate change. The boring beetles mean that every uninfected oak is precious as a source of acorns, so cutting them down because they are inconvenient sacrifices acorns we need for countywide restoration. Additionally, oak trees are habitats for hundreds of species, but seedling oaks are not. **Where will all the oak-dependent species go in the decades between when the adults are cut down and when the saplings become big enough to support them?** Worse, with climate change, deep-rooted adult oaks may have an survival advantage over shallowly rooted seedlings, especially if no care will be provided. Unfortunately “Established” as a standard of mitigation success is too little, too late, and is not acceptable as a mitigation measure. Impact avoidance is far better.

05-16 Given the problems with the surveys, Mitigation Measure BIO-5 would be better done as an entire construction resurvey with plans to avoid *any sensitive species found prior to or during construction*. The numbers of plants to be protected are meaningless due to the age of the data, the sloppiness of the surveys, and all the changes since then. Only a team of biologists doing a systematic survey for plants during the proper season can set up the proper protections. **Why not do it?**

05-17 Mitigation Measure BIO-6 states that no non-native, invasive plants will be introduced in to the Habitat Preserve. **How will “immediately adjacent” be defined? Will horticultural plants be ripped out of people’s yards by the HOA if they are immediately adjacent? What are the limits for this mitigation, and how will it apply to private property within the Project?** Please elaborate and clarify this.

05-18 Mitigation Measure BIO-9 provides protection for the Habitat Preserve by using cactus, poison oak, and stinging nettle on, children, dogs, and recreationists. This mitigation measure should be stricken from the DEIR. **Who will carry the liability for this mitigation work, the person who wrote it? Where will poison oak be obtained, since it is not in the nursery trade? Will the cactus be locally native? Rare species that are expensive and readily poached? Prickly pears that are readily destroyed with golf clubs<sup>1</sup>? Nettles that are foraged for food?** That the City Council is being asked to approve this document makes the entire city of Santee potentially liable for any damage caused by this misguided mitigation. Instead, the site needs a ranger and years of education to persuade people to give nature space.

<sup>1</sup> Prickly pears regularly get destroyed anywhere they have been used to close unauthorized trails.

considered appropriate or deemed infeasible. It is unlikely that restoration of all temporary impact areas, which include manufactured slopes adjacent to the Habitat Preserve and grading buffers that would be revegetated following construction, would be feasible. Thus, the 145.51-acre surplus of lands is enough to mitigate all temporary impact areas deemed inappropriate for in-place restoration.

**05-14:** The comment asks how mitigation measures related to narrow endemic plant species are enforceable if the measures follow the Draft Santee MSCP Subarea Plan (note: the comment refers to this mitigation measure as Mitigation Measure BIO-3 in the EIR, but it is Mitigation Measure BIO-4 in the Biological Resources Technical Report [Appendix D]; see Table 6-1).

The mitigation measure related to narrow endemic species applies the mitigation goals (i.e., 80 percent conservation of the species either through conservation or translocation outlined in the Draft Santee MSCP Subarea Plan). However, the mitigation measure does not rely on the plan to be implemented. Mitigation Measure BIO-4 in the Biological Resources Technical Report (Appendix D) requires that 80 percent of the species impacted by conserved and/or translocated and conserved. An Upland Restoration Plan (Appendix Q of Appendix D, Biological Resources Technical Report) discusses appropriate methods for plant salvage and/or

growing and planting; in general, the impacted population of the sensitive plant shall be targeted for salvage and translocation in order to meet the 80 percent minimum translocation survival rate. Where this is not feasible, germination and growing of appropriate genetic stock shall occur and be planted on site in suitable receptor sites. Success of the translocation program in the receptor sites are established such that the plant and acreage goals as required in Table 4.3-10 and shall be measured through 5 years of monitoring and annual reporting to the City.

- O5-15:** The comment states the perceived issues with Mitigation Measure BIO-4, including boring beetles that affect acorn production, slow maturation rates of oaks, and climate change, and concludes that the mitigation measure is unacceptable and avoidance oak tree removal is best. The City agrees that avoidance of oak trees is preferable. The Habitat Preserve would include 89 percent (26.36 acres, approximately 351 individual oak trees) of all oak woodland on the project site. Therefore, the oak trees conserved in the Habitat Preserve would be capable of continuing their normal acorn production. Habitat for oak-dependent wildlife species would still be provided in the conserved 26.36 acres of oak woodland present in the Habitat Preserve. The comment incorrectly states that no care for the replanted oak trees would occur. The replanted oak trees would be provided care as

directed by the Wetland Mitigation Plan (Appendix S to Appendix D, Biological Resources Technical Report).

The comment states that “established” as a standard of mitigation is not acceptable. “Established” was defined in Mitigation Measure BIO-4 as 5 years of sustained life without the assistance of irrigation and growth rates that are similar to those of naturally occurring reference oak trees. Adaptive management and remedial measures would occur according to the Wetland Mitigation Plan (Appendix S to Appendix D, Biological Resources Technical Report) and Preserve Management Plan (Appendix P to Appendix D, Biological Resources Technical Report) to ensure the persistence of oak woodland in the Habitat Preserve. Based on the expert opinion of the biologists who prepared the Biological Resources Technical Report (Appendix D to the EIR), the City has concluded that the mitigation provided in the EIR for impacts to oak trees and oak woodland is sufficient to reduce impacts to a less than significant level.

- O5-16:** The comment suggests that Mitigation Measure BIO-6 be a preconstruction survey for the entire site versus the off-site impact areas (note: Mitigation Measure BIO-5 in the EIR is the same as Mitigation Measure BIO-6 in the Biological Resources Technical Report [Appendix D]). The comment continues and states that the number of plants being protected is meaningless due to the age of

the data, the sloppiness of the surveys, and the changes since the survey.

As described in responses to comments O5-5 and O5-8, the special-status plant surveys conducted for the proposed project are considered adequate to prepare an impact analysis, prescribe appropriate mitigation measures in compliance with CEQA, and reach the conclusion that the impacts would be less than significant after mitigation.

- O5-17:** The comment questions how immediately adjacent is defined, whether plants would be removed from residents' yards, and how would the mitigation apply to private property. Mitigation Measure BIO-6 includes land use adjacency guidelines that require that all open space slopes immediately adjacent to the Habitat Preserve to be planted with native species that reflect the adjacent native habitat and that no invasive non-native plants shall be introduced into these areas.

The intent of the mitigation measure is that temporary impacts between the development and the Habitat Preserve, that is the open space areas, shall be planted with native species and that no invasive non-native plants shall be planted in these areas.

In addition to revegetating temporary impacts with native species, the proposed project's Fire Protection

Plan (Appendix P1) includes a list of approved plant species. Refer to Appendix F of the Fire Protection Plan (Appendix P1), which outlines those plants species acceptable in the fuel modification zone (FMZ) areas that surround the project site and are adjacent to the Habitat Preserve. Non-native plants would not be removed from off-site residential properties.

- O5-18:** The comment questions the use of cactus, poison oak, and stinging nettle as a deterrent to incursions into open space by domestic pets and people. The comment asks who is liable for this mitigation measure, where the poison oak will be obtained, and whether the cactus can be locally native. The comment also states the rare species are expensive and are readily poached, prickly pears are destroyed by golf clubs, and nettles are foraged for food. The comment continues to state that the site needs a ranger to keep domestic pets and people out of open space.

Mitigation Measure BIO-9 (which is the same as Biological Resources Technical Report Mitigation Measure BIO-19) will be revised to clarify that the cactus planted would be native and that no poison oak or stinging nettle would be used.

**BIO-9: Habitat Preserve Protection.** In order to help protect against incursions by domestic pets, children, or recreationists, brush management zones,



temporary impact zones between roadways, manufactured slopes in development areas, and open space shall be planted with native cactus species, ~~poison oak, stinging nettle~~, and redberry buckthorn as appropriate. Native ~~C~~cactus shall be planted so that it does not hinder fire access, but will be clustered so that it discourages or inhibits encroachment. An added benefit is that these areas eventually could support coastal cactus wren. Suitable areas, acreages, and methods are addressed within the Preserve Management Plan.

Plant species that are readily poached and prickly pears will not be planted.

Additionally, an on-site Preserve Management Plan, included as Appendix P of the Biological Resources Technical Report (Appendix D), has been prepared for the proposed project. One of the main purposes of this document is to monitor compatible (and incompatible) uses within and adjacent to the Habitat Preserve such that effects on biological resources are avoided or minimized. The on-site Preserve Management Plan would provide monthly monitoring of the overall conditions of the Habitat Preserve and determine if any management tasks are required. The monitoring would include evaluating whether or not the proposed natural barriers to the Habitat Preserve are effective or causing any issues with human or domestic pets.

05-18 cont. This problem has been dealt with for decades throughout San Diego County, and it is sad that none of this experience made it into this planning document.

**2. Fire Issues**  
 First, it appears that the incorrect standard of analysis was used in section 4.18.3: "According to Appendix G of the CEQA Guidelines, if located in or near state responsibility areas of lands classified as very high fire hazards severity zones, impacts to wildfire would be significant if the proposed project would:

- "Threshold 1: Substantially impair an adopted emergency response plan or emergency evacuation plan.
- "Threshold 2: Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.
- "Threshold 3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- "Threshold 4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes."

It is not clear where this came from.  
 Per Appendix G as given by the California Resources Agency<sup>2</sup> and the Association of Environmental Professionals 2020 CEQA Statute and Guidelines, the relevant threshold of analysis is:

05-19 "IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:....g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?"

**Why not use the current thresholds of significance for the analysis?**  
**Because the wrong threshold of significance was used in the analysis, the entire analysis is fatally flawed. It does not answer the basic question of whether the Project will expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.**

05-20 The answer is obvious, given that the Project site was burned by the Cedar Fire; yes, this is a potentially significant impact. **What can be done about it?**

**Can homes and buildings be made effectively fireproof?** Not if they only are built to current code. Recently built homes built to current code burned in the Paradise Fire, the Tubbs Fire, and the Thomas Fire, among others. Therefore, this is either an unmitigated potential impact, or the standard of construction will have to be considerably higher, with the buildings built specifically to withstand fire, as at Pepperdine University. **How will the buildings be constructed to mitigate wildfire impacts? Or are these unmitigated impacts that will have to be accepted? How many homes are likely to be damaged or lost in an extreme, wind-driven wildfire?**

05-21

05-22 **Can vegetation management prevent loss of structures or life?** Only to a very limited degree. There is certainly a need to clear around the edges of the development, so that firefighters have a relatively safe space in which to fight a fire. Unfortunately, pictures clearly

05-23

<sup>2</sup> <https://resources.ca.gov/CNRA/LegacyFiles/ceqa/docs/ab52/final-approved-appendix-G.pdf>

Questions of the City's liability related to implementation of mitigation measures recommended in the EIR are not relevant to the sufficiency of the EIR to assess the impacts of the proposed project, the significance of impacts, or the effectiveness of mitigation measures. Therefore, no further response to this aspect of the comment is provided.

**05-19:** The comment questions the EIR's use of the CEQA wildfire specific impact determination trigger threshold questions in Section 4.18.3, Thresholds of Significance. The EIR's use of the four trigger threshold questions is accurate and required by CEQA. These questions are found in Appendix G of the 2019 and 2020 CEQA handbook. Prior to 2019, these questions were not part of the EIR analysis process.

**05-20:** The comment suggests that the EIR is flawed by not addressing potential wildfire risks in the Hazards and Hazardous Materials section of the EIR. This section, on page 4.8-12, directs the reader to Section 4.18, Wildfire, for a comprehensive analysis of potential wildfire impacts. As explained in CEQA Guidelines, Appendix G, Section XX, Wildfire, for projects proposed in very high fire severity zones, a more detailed analysis of wildfire risk is required, and the thresholds of significance are tailored to the unique risks associated with placing people and structures in very high fire risk

areas. These thresholds expand on and in some instances replicate the wildfire-related thresholds in Appendix G, Section IX, Hazards and Hazardous Materials. Analyzing and answering the four wildfire specific threshold questions in CEQA Guidelines Appendix G, Section XX, Wildfire, regarding (i) emergency response plans, (ii) wildfire risks and exposure of project occupants to pollutant concentrations or the uncontrolled spread of wildfire, (iii) installation of infrastructure that increases risk, and (iv) exposing people to risk of downstream flooding or landslides as a result of wildfire, necessarily addresses the fire environment and the potential risk, including property loss, injury, and death, that project occupants may be subject to over the life of the proposed project, adequately addresses the proposed project's unique risks associated with placing people and structures in a very high fire severity zone. Applying these standards, the EIR concludes that the potential impacts associated with wildfire, under all applicable thresholds, are less than significant. To be clear, the proposed project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Please refer to Section 4.18, Wildfire, and in particular Sections 4.18.2.1 and 4.18.2.2, which address the state and local requirements specifically intended to minimize injuries, loss of life, and property damage resulting from fire hazards. The wildfire analysis in the EIR addresses in

depth the extensive “fire protection features that form a redundant system of protection to minimize the likelihood of wildfire exposing people or structures to a significant risk of loss injury or death involving wildland fires.” See also Thematic Responses – Evacuation, Ignition and Risk, and Fire Protection and Safety. Moreover, the 2020 Fire Protection Plan (Appendix P1) analyzes the proposed project’s impact from and to wildfire and concludes (Section 8) that the proposed project complies with the requirements of the 2019 Codes and County Fire Protection Plan Guidelines for Determining Significance (2010). The recommendations in this document meet or exceed fire safety, building design elements, infrastructure, fuel management/modification, and landscaping recommendations of the applicable codes. Further, with all of the features and measures identified in the Fire Protection Plan (Appendix P1, Tables 7 and 8), the proposed project’s impact on fire safety would be less than significant.

- O5-21:** The comment suggests that the analysis is fatally flawed because the significance question in CEQA Guidelines, Section IX, Hazards and Hazardous Materials, was not cited for determining significance. Please refer to response to comment O5-20, which addresses the same issue.
- O5-22:** The comment states that buildings cannot be made fireproof and refers to homes/buildings lost in Northern California fires between 2016 and 2018. The comment

questions how buildings will be constructed to mitigate wildfire impacts, if these are unmitigated impacts, and how many homes are likely to be damaged or lost in an extreme, wind driven wildfire. The proposed project's buildings would incorporate the latest in fire protection, which focuses on exterior hardening and ember protection, along with interior life safety systems. Please refer to Thematic Response – Fire Protection and Safety for details on the site's ignition resistance buildings and the other components of the fire protection system required for the proposed project. The comment inaccurately refers to homes and buildings lost in Northern California fires as examples of what would occur at the proposed project. There are many differences between the building ignition resistance levels and the fire environments that result in vastly different hazards and risks. Please refer to Thematic Response – Northern California Contrast for details on why the type of wildfire and structure loss would not be realized at the proposed project.

- O5-23:** The comment provides opinions regarding vegetation management limitations, ember-caused ignitions, and landscape plantings and their potential impact on fire safety. The proposed project's Fire Protection Plan (Appendix P1) analyzes and provides site features to provide a buffer between unmaintained open space fuels and the developed areas. The site-wide landscape would

be required to be maintained in a fire safe condition. Twice annual inspections by a third-party inspector would provide assurance that the landscape in FMZs do not accumulate prohibited plant species near residences. The homeowners association would proactively communicate with the homeowners/residents regarding their limitations, and the Fire Protection Plan would be provided to every homeowner with the covenants, conditions, and restrictions. Regarding embers, the comment appears to ignore the numerous references to and analysis of airborne embers in the Fire Protection Plan (Appendix P1), identifying this wildfire issue as one of the priority concerns for the protection of structures. Flying embers, along with other potential fire threats to the proposed project structures, have been evaluated and addressed/disclosed in the 2020 Fire Protection Plan (Appendix P1). For example, embers are mentioned 270 times in the Fire Protection Plan, including in Section 6.4.1, where it states that embers are one of two primary concerns for the site's structures. Because the comment provides inaccurate information and ignores the EIR's extensive analysis regarding airborne embers, the comment raises no new issues and requires no additional response.

05-23 cont. show in the Paradise fire that spot fires started by windblown embers erupted more than a mile downwind of the fire front. No one wants to live in a place that is surrounded by bare dirt fire breaks to the horizon. Even that is insufficient, as the world record for an ember throw starting a fire is more like 10 miles, in the Bunyip Ridge fire in Australia. Worse still, all it takes is ignorant homeowners planting palms or other flammable plants under their eaves, or putting up flammable materials on their walls, to render much of the vegetation management pointless.

05-24 **Can all the people get out in time if they are evacuating during an extreme, wind-driven wildfire? Where is this analysis? Dudek is known for producing these analyses for (among others) Valiano, Harmony Grove Village South, Newland Sierra, and Lilac Hills Ranch.** The analysis simple to produce: all that is required is traffic flow information and a model of how a dangerous fire would spread through the Project site. As it is, we are left with the questionable information (section 4.18.1.3) that the 2003 Cedar Fire spread at 3600 acres/hour, and that the Project is 2,638 acres with 3000-odd residences and commercial space. Ten thousand people? This would seem to imply that the Project area of thousands to tens of thousands of people can be evacuated in (2638 acres/3600 acres/hour) 0.73 hours, or under 45 minutes. **Can the roads handle this volume of traffic? It seems highly unlikely.**

05-25 **Will the evacuation routes be blocked by fire?** Quite possibly. All roads into and out of the Project areas pass through sections where they will be lined by native vegetation. Even if this vegetation is properly treated, it is likely that thousands of people will be evacuating through smoke and flames. **Is this a significant impact? How will it be mitigated?**

05-26 **Do all parts of the development directly connect to high volume exit roads?** From the map, it appears that Magnolia Avenue is the only exit route that can handle high volumes of traffic. It also appears that Development Phase C does not connect to Magnolia Avenue. **How will the residents of Phase C evacuate the property? Will they have to go through automatic gates that will be shut during a power outage? Is there sufficient time for them to be evacuated before a predictable fire overruns the development?**

05-27 **Are there any safe zones in the Project?** Projects such as Otay Ranch Village 14 have proposed using large commercial parking lots as fallback areas in the event of a botched evacuation. Unfortunately, the fire analysis is unclear about whether the commercial space will have sufficient parking for this particular maneuver. **Why was this analysis not included?**

05-28 **Finally, why were CNPSSD's comments on the NOP in 2018 ignored?** Here are the fire comments, largely verbatim. A lot of trouble could have been saved if they were simply followed.

05-29 "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.

05-30 "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 EIRs have focused entirely on human safety, with the implicit notion that the homes 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. **What are the results of such an analysis?**

05-31 "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

**05-24:** The comment questions if the proposed project can be safely evacuated during a wind-driven fire, requests analysis, and provides its own analysis of evacuation times. Project evacuation is addresses in Section 4.18.5.1. The EIR concludes that the proposed project would not obstruct or impede an adopted emergency response or evacuation plan. Moreover, a Wildfire Evacuation Plan for the proposed project has been prepared and is included at Appendix P2. Please refer to the Thematic Response – Evacuation, which details evacuation planning and implementation in the City and the County. If a wildfire occurs that does not enable timely evacuation, the proposed project is capable of providing temporary on-site refuge if emergency managers determine it is safer than an evacuation option. The acreage based evacuation timeframe offered in the comment is overly simplistic and assumes burn characteristics that are not consistent with actual fire spread. Under CEQA Guidelines, a lead agency is not required to conduct every test or perform all research, study, or experimentation recommended or requested in comments. Furthermore, while the EIR must evaluate the potential wildfire impacts, this evaluation need not be exhaustive. Rather, the sufficiency of an EIR is considered in light of what is reasonably feasible.

As discussed more fully in Thematic Response – Evacuation and the Wildland Fire Evacuation Plan

(Appendix P2), there are many variables at issue when modeling fire behavior and measuring corresponding response and evacuation times, and it is infeasible to account for every potential scenario. The number of variables and assumptions that would be necessary to accurately model all potential evacuation scenarios would render the results of little or no value in an emergency situation as emergency response agencies managing an evacuation are not likely to refer to a project-specific evacuation plan, relying instead on their own pre-fire planning and evacuation protocols along with the emergency-specific appropriate actions. In an effort to account for evacuation in a range of fire situations, the Wildland Fire Evacuation Plan (Appendix P2) prepared for the proposed project discusses community readiness and, in Sections 1.1 through 1.4, provides a quick reference for future proposed project residents so that they are familiar with the potential for evacuations and various actions they may be asked to take. Section 1.2 provides information and a link for residents to sign up for emergency alerts so they receive emergency messaging, which would assist in their early notification. The remainder of the Wildland Fire Evacuation Plan provides information pertaining to the typical evacuation process, the evacuation road network, and evacuation procedures. The information in the Wildland Fire Evacuation Plan is designed to assist evacuation efficiencies by creating an aware community



that is ready to go when directed to do so, or remain in their homes if considered safer than evacuating. Further, Section 6 of the Fire Protection Plan (Appendix P1) provides a detailed discussion of the site's fire safety requirements including defensible space, infrastructure and building ignition resistance. In Section 5, the Fire Protection Plan evaluates the ability to provide fast emergency response throughout the proposed project, with modeled results indicating all proposed project structures are within 4 minutes travel time from the on-site fire station. The system of protections considers the fire environment and the type of wildfire it may produce and provides for evacuation or temporary on-site refuge in protected buildings or designated areas.

- O5-25:** The comment questions if the evacuation routes will be blocked by fire and states that evacuations will occur through smoke and flames. Please refer to Thematic Response – Evacuation for a summary of how evacuations are planned and implemented in the City and the County. While it is true that the proposed project's evacuation routes travel short distances through undeveloped landscapes, these roads would be wide with multiple lanes and roadside FMZs that would provide a hardened corridor through which vehicles would travel. Understanding the evacuation process is important regarding the comment's assumptions that people would be evacuated if a wildfire is burning in the area. Wildfire

evacuations are fluid and rely on situational awareness. When a wildfire breaks a demarcated trigger threshold where continuing evacuation would potentially put residents in harm's way, the proposed project offers the contingency option of temporary on-site refuge in protected homes, at the school, the Village Center, or other locations designated during a wildfire. Evacuation managers would not send vehicles into conditions that were considered unsafe when they have the option of letting a fire burn around the proposed project's wide ignition resistant landscapes and FMZs. This comment provides opinions that are not supported with corresponding data. Evacuations have been adequately analyzed in the EIR, according to CEQA, and require no additional response.

- O5-26:** The comment asks if all parts of the proposed project connect directly to high volume exit roads. The proposed project includes internal circulation roads that meet the City's requirements for width, grade, parking, and surfacing. These roads provide access to the primary proposed project access roads of Fanita Parkway and Cuyamaca Street, with connection to Magnolia Avenue. These routes are considered to provide adequate capacity to move vehicles during an evacuation. The comment consists of a series of questions and raises no new issues that have not been adequately addressed in the EIR. No additional response is required.

**O5-27:** The comment asserts that Magnolia Avenue is the only “high volume” road serving the proposed project. It also states that Development Area C does not connect to Magnolia Avenue and questions how Area C would evacuate, if there are gates, and whether they would have time to evacuate. It is not defined in the comment what “high volume” is referring to or where Area C is located, but all proposed project roads lead to an internal circulatory road system that would enable access to Fanita Parkway, Cuyamaca Street and then to Magnolia Avenue. The Special Use area in the southwestern portion of the project site does not have a separate connection to Magnolia Avenue and is not proposed for residential uses but would be used for other purposes. Please refer to response to comment O5-26 for more information regarding road circulation. Gates are not proposed in the proposed project, but should any gates be approved, they would meet all Santee Fire Department requirements. Please refer to responses to comments O5-24 and O5-25 for additional details regarding evacuations of the proposed project’s residents and why late evacuations would not be attempted. The comment provides opinions and asks for additional information, none of which raises new issues that have not been adequately addressed in the EIR. No additional response is required.

- O5-28:** The comment asks whether there are safe zones planned in the community in the case of a failed evacuation. As detailed in the Thematic Responses – Fire Protection and Safety and Evacuation, the entire proposed project is considered to provide emergency management with the ability to direct residents to temporarily refuge in their protected homes or at other site locations. These areas could include the school, the Village Center, in vehicles on interior streets and may include all or a portion of the proposed project population. The comment requests information that was provided in the Appendices P1 and P2 and does not raise a new issue with the EIR’s analysis adequacy. No additional response is required.
- O5-29:** The comment asks why its comments on the 2018 NOP were ignored and provides introductory remarks for following comments. The comments provided by CNPS were not ignored. The fire environment analysis, following a standard fire protection plan format, provided a comprehensive assessment of the site, its risk and informed development of a fire protection system that would result in a fire hardened community appropriate for the fire environment in which it would be located. The comments provided CNPS in 2018 are re-provided in the next four comments and are addressed individually. The comment raises no new issues that have not been addressed by the EIR. Therefore, no additional response is required.

- O5-30:** Please refer to response to comment O5-20. The Wildfire section in the EIR directly addresses the extensive “fire protection features that form a redundant system of protection to minimize the likelihood of wildfire exposing people or structures to a significant risk of loss injury or death involving wildland fires.” See also, Thematic Responses – Evacuation, Fire Ignition and Risk, and Fire Protection and Safety. Moreover, Appendix P1, the Fire Protection Plan, analyzes the site’s impact from and to wildfire and concludes (Section 8) that the proposed project complies with the requirements of the 2019 codes and County Fire Protection Plan Guidelines for Determining Significance (2010).
- O5-31:** The comment questions whether the site includes specific buildings and design to be used for on-site sheltering and provides an example of where sheltering has occurred successfully during wildfire. Please refer to the Thematic Responses – Fire Protection and Safety and Evacuation for details on the site’s ability to be designated for temporary on-site refuge when an evacuation is considered unnecessary or less safe. The proposed project includes the same features provided in the Rancho Santa Fe “shelter in place” communities that have been tested by wildfire and have performed well. Even with these shelter-in-place communities, the preferred approach is early evacuation. This would be the case for the proposed project because getting people

05-31 cont. 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, and that campus was designed explicitly for that purpose, from the wide lawn margin to building design.<sup>3</sup> Shelter 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 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.

05-32 Third, "Ready, Set, Go" planning was denigrated by both County Sheriffs and CalFire as unworkable and in the County Supervisor hearings to approve Harmony Grove Village South. They prefer phased evacuations and "shelter on site." In the evacuation plan, please include information from CalFire and County sheriff about the best option for the proposed Project. **Why was this not done, and why was Ready Set Go included?**

05-33 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 can 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.

05-34 Finally, **PLEASE INCLUDE A PROJECT ALTERNATIVE THAT MINIMIZES FIRE RISK.** This would include fire-safe housing design, hardscape 5' out from buildings, no wooden fences near buildings, plantings well away from homes, irrigated native plantings (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 design at the southern end of the site 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 the active adults) on the windward side of the community, where they face the fire first. "**Why was this not done?**

**3. Greenhouse Gas Issues**

05-35 First, the regulatory setting appears to be incomplete. This is unusual, as the consultant (Dudek) has done more complete GHG analyses for other recent projects. **Why did the DREIR not include necessary regulatory setting material such as the following?<sup>4</sup> How would it change the analysis and conclusions:** **"Energy Independence and Security Act.** The Energy Independence and Security Act of 2007 (December 2007), among other key measures, would do the following, which would aid in the reduction of national GHG emissions (EPA 2007):

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.

<sup>3</sup> <https://la.curbed.com/2018/11/20/18097889/wildfire-pepperdine-malibu-shelter-in-place>  
<sup>4</sup> From the Otay Ranch Village 14 DEIR.

out early is the safest approach when wildfire threatens. However, when circumstances arise where evacuation is considered less safe, a contingency option is necessary. Therefore, the approach with the proposed project is to provide a comprehensive system of protection that enables the entire site to be considered for temporary on-site refuge while a wildfire burns around the project site. The concept of on-site sheltering has been thoroughly analyzed and addressed in the EIR (Appendix P1). The comment also requests information and provides opinions but does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**05-32:** The comment suggests that the evacuation program known as Ready, Set, Go should not be used in the proposed project's evacuation plan and conflicts with approaches used by Cal Fire and County Sheriff's Department. The comment inaccurately describes Ready, Set, Go program as conflicting with the City and the County's approach to evacuations. Please refer to Thematic Response – Evacuation for details regarding evacuation planning and implementation in the City and the County. Further, the Ready, Set, Go program focuses on maintaining an aware and ready populace. It provides personal action plans so residents are aware of the potential hazards and are ready to implement their personal plans and evacuate when directed. The phased evacuation approach dovetails with

the Ready, Set, Go program in that phased evacuations still rely on a ready and aware population. The more ready and aware, the more seamless and efficient phased evacuations are. Similarly, the Ready, Set, Go concept easily facilitates an on-site refuge option, especially in a proposed project where the homeowners association would actively provide educational outreach to its residents. Residents would be ready to act and understand that the direction to remain on site means that emergency managers have determined that it is the safest alternative. The comment raises no new issues with the adequacy of the EIR's analysis or conclusions. No additional response is necessary.

- O5-33:** The comment describes phased evacuation failures from the Camp Fire in Paradise, California, and suggests that the reverse 911 system was not robust enough to manage a phased evacuation. Please refer to the Thematic Responses – Evacuation and Northern California Contrast for details regarding reasons why Paradise's evacuation failed and how evacuation planning and implementation occurs in the City and the County, including the very robust Alert San Diego system that is capable of contacting a significant number of phone numbers simultaneously, as it has done in several wildfires dating back to 2007. In addition, the County has a multi-pronged messaging approach that does not rely solely on the Alert San Diego system and includes social media, radio, television, and airborne and ground

based notifications, where necessary. The County system of messaging is sophisticated and more advanced than the system used in Paradise and the track record of successfully using its systems separates the County from Paradise. This comment advises against using a phased approach if the alert system is not capable of handling it and that clearly is not the case in the County. Therefore, the comment does not raise any issues that have not already been analyzed and adequately addressed in the EIR. No additional response is necessary.

- O5-34:** The comment suggests providing a project alternative that minimizes fire risk and provides a list of features/design attributes that would result in achievement of the suggested alternative. The comment lists the following recommendations for achieving a minimized fire risk alternative: (1) fire safe housing design, (2) 5 feet of hardscape around every structure, (3) plantings well away from homes, (4) irrigated native plantings, (5) compact community design at the southern end of the site, (6) multi-lane avenues in and out to ease evacuations, (7) minimized brush management zones, and (8) not positioning vulnerable people on the windward side of the development. Of these eight recommendations, all but limiting development to the southern end of the site would be applied by the proposed project. Please refer to Thematic Response – Fire Protection and Safety regarding the proposed



project's achievement of these fire safety and risk minimizing measures. The proposed project's Fire Protection Plan (Appendix P1) provides for each of these recommendations as follows: (1) fire safe housing design – Section 6.4, (2) 5 feet of hardscape – Section 6.1.1.1, (3) plantings well away from homes – Section 6.1, (4) irrigated native plantings – Section 6.1.1 and Appendix G, (6) multi-lane avenues in and out to ease evacuations – Section 6.3, (7) minimized brush management zones – Section 6, and (8) positioning of vulnerable people – Section 4. Recommendation 5 is partially achieved by creating higher density developed areas, which compresses the development footprint. Limiting the developed area to the southern portions of the project site would place development and residents incrementally closer to urbanized areas of the City, resulting in incrementally faster evacuation times. However, the proposed project is considered to represent a viable minimized fire risk alternative negating the need to consider additional project location options. The comment suggests several recommendations for minimizing fire risk, all but one of which have been contemplated and are being provided for the proposed project. The comment raises no new issues that have not been adequately addressed in the EIR. Therefore, no additional response is required.

05-35 cont.

- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

**“Federal Vehicle Standards.** In response to the U.S. Supreme Court ruling in *Massachusetts v. EPA*, the George W. Bush Administration issued Executive Order (EO) 13432 in 2007 directing EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Transportation Safety Administration (NHTSA) issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011; and, in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016 (75 FR 25324–25728).

“In 2010, President Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO<sub>2</sub> by model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021 (77 FR 62624–63200). On January 12, 2017, EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks (EPA 2017c).

“In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018 (76 FR 57106–57513). The standards for CO<sub>2</sub> emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6% to 23% over the 2010 baselines.

“In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans and all types of sizes of buses and work trucks. The final standards are expected to lower CO<sub>2</sub> emissions by approximately 1.1 billion MT and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program (EPA and NHTSA 2016).”

05-36

05-37

**“State Climate Change Targets**  
**“SB 32 and AB 197.** SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target, make changes to CARB’s membership and increase legislative oversight of CARB’s climate change-based activities, and expand dissemination of GHG and other air quality-related emissions data to enhance transparency and accountability. More specifically, SB 32 codified a 2030 emissions reduction target that requires CARB to ensure that statewide GHG

**05-36:** This comment provides a summary of federal vehicle standards. Because California vehicle fuel standards are more stringent than federal vehicle standards, they were not included (also see response to comment O5-35). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**05-37:** This comment provides a summary of AB 197, which is a companion bill to SB 32. Note that AB 197 requires particular representation of state agencies on a joint legislative committee on climate change policies, which has no relevance to the analysis of GHG emissions under CEQA or the focus of Section 4.7 of the EIR, which is to determine if project-generated GHG emissions would create a significant impact to the environment. Because this companion bill had no relevance to the analysis it was not included in the EIR.

05-37 cont. emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also adds two members of the Legislature to CARB as nonvoting members, requires CARB to make available and update (at least annually via its website) emissions data for GHGs and other pollutants from reporting facilities; and, requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan."

05-38 **Why were these not included?**  
**Why wasn't EO-B-55-18 referenced as part of the regulatory setting?** The key quote from this two page document is "A new statewide goal is established to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. This goal is in addition to the existing statewide targets of reducing greenhouse gas emissions."

05-39 **Can the Project achieve net carbon neutrality by 2045? If not, isn't this a significant, unmitigated impact?** It appears (p. 4.7-26) that the best the Project can do is "Therefore, per capita emissions would be reduced to below the 1.77 MT CO<sub>2</sub>e threshold for either land use plan, and impacts would be mitigated to a less than significant level." This is far more than zero. **What more can be done? Isn't requiring some token amount of solar panels on roofs and one electric car per 100 people insufficient? What are the unmitigated impacts?**

05-40 **Why wasn't Public Resources Code Division 15, Chapter 12. Solar Shade Control [25980-25986], passed in 1974, mentioned?** Under this statute, it is essential that the street trees planted during or after the Project build phases should not overshadow the solar panels. **Since greenhouse gas mitigation involves planting trees, was there coordination between the landscape architect designing the tree planting guide and the architects designing the homes to insure that this rule was followed, so that the mitigations involving solar panels and tree planting do not cancel each other out?**


05-41 **Why is there a plan to pipe natural gas into the Project? Wouldn't it be simpler to have ALL buildings be all-electric? How much GHG emission would this save?**

05-42 **How much electricity would be generated by the solar installations proposed in the GHG?** It appears that mitigation GHG-1 is contingent upon a solar feasibility survey to be completed after the Project is approved. Is that correct? Doesn't this improperly defer mitigation? How much electricity could be generated by Project solar panels?

05-43 **Why is there no plan for installing house batteries to power the homes off solar panels as much as possible?** There is not even room in garages for batteries, much less any move to install them.

05-44

05-45 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@cnpsd.org and franklandis03@yahoo.com.

Sincerely,  
  
 Frank Landis, PhD  
 Conservation Chair  
 California Native Plant Society, San Diego Chapter

**05-38:** This comment addresses Executive Order B-55-18, which sets a non-legislative statewide goal of net carbon neutrality (zero net emissions after offsets) by 2045. Section 4.7.2.3 of the EIR discusses the statewide 2045 goal in the context of the Sustainable Santee Plan. For additional clarity, the following paragraph is added to Section 4.7.2.2 in the Final EIR describing Executive Order B-55-18:

**Executive Order B-55-18**

On September 12, 2018, California Governor Jerry Brown announced, through Executive Order B 55-18, the following GHG emissions target:

- By 2045, California shall achieve statewide net carbon neutrality.

The emission reduction target of net carbon neutrality is a long-term goal. The order includes specific CARB actions including setting a goal of 5 million zero emission vehicles and doubling the reduction of carbon fuels by 2030 and developing a forest carbon plan with specific regulations to reduce statewide sources of GHG emissions toward carbon neutrality. The Executive Order does not include a specific guideline for local governments.

This clarification does not affect the analysis or conclusions provided in the EIR.

- O5-39:** The comment refers to the proposed project's solar commitment. Please refer to Thematic Response – 2017 Scoping Plan. Please also refer to comment O7-101 (Comment Letter O7, Preserve Wild Santee, July 13, 2020), which addresses the same issue raised in this comment.
- O5-40:** The comment asks why California Public Resource Code, Division 15, Chapter 12 (PRC D15 Ch12), Solar Shade Control (1974), is not mentioned in the EIR and claims that tree planting might violate this statute. Section 4.7 of the EIR discusses the proposed project's tree planting commitments. Pursuant to Mitigation Measure GHG-5, the proposed project must include 26,705 trees and at least 237.4 acres of bushes and hedges on site. The City shall review the proposed project's landscape plans to ensure this requirement has been satisfied. Moreover, Mitigation Measure GHG-1 requires that a solar feasibility study be performed prior to the installation of solar panels in order to ensure that rooftop solar is not shaded prior to construction of each phase. Therefore, the proposed project would comply with all existing laws, including California Public Resources Code D15 Ch12. Nevertheless, the applicant has agreed to add the following Condition of Approval:

All public, homeowner association and private landscape installations shall be subject to the Solar

Shade Control Act of 1979, Public Resources Code  
Sections 25980–25986.

- O5-41:** The comment asks whether the landscape architect was involved in the proposed project design. The landscape architect was consulted as part of the proposed project design. Project landscape concepts and design guidelines were performed by professional landscape architects registered in the State of California.
- O5-42:** The comment asks why there is a plan to pipe natural gas into the proposed project. For non-residential uses, depending on the end user, electricity only may not be feasible or practical. However, Mitigation Measure GHG-4 requires all-electric homes in the proposed project. As demonstrated in Section 4.7.5.1, with mitigation, GHG emissions would be less than significant even with natural gas being included for the non-residential use on site.
- O5-43:** The comment refers to the proposed project's solar commitment. Please refer to response to comment O7-101 (Comment Letter O7, Preserve Wild Santee, July 13, 2020), which addresses the same issue raised in this comment.
- O5-44:** The comment refers to the proposed project's battery storage. Please refer to response to comment O7-101 (Comment Letter O7, Preserve Wild Santee, July 13, 2020), which addresses the same issue raised in this comment.

**O5-45:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

### References

Clover Valley Foundation v. City of Rocklin (2011) 197 Cal.App.4th 200, 245. Court of Appeals of California, Third District. July 8, 2011

CNPS (California Native Plant Society). 2018. “RE: Otay Ranch Village 14 and Planning Areas 16 & 19, LOG NO. PDS2016-EIR-16-19-006; SCH NO. 2016121042. PROJECT NUMBERS: PDS2016-GPA-16-008, PDS2016-SP-16-002, PDS2016-REZ-16-006, PDS2016-STP-16-027, and PDS2015-TM-5616.” San Diego Chapter of the California Native Plant Society: San Diego, California. Otay Ranch Village 14 and Planning Areas 16/19 EIR. April 16.

CNPS. 2019. “RE: SEIR for Otay Ranch Village 13 Master Planned Community-Resort Village: PDS2004-3800-04-003; PDS2004-3810-04-002; PDS2004-3600-04-009; PDS2004-3100-5361A & B; LOG NO. PDS2004-04-19005; SCH NO. 2004101058.” San Diego Chapter of the California Native Plant Society, Conservation Committee: San Diego, California. May 20.

Dudek, USACE. 2020. “Subject: U.S. Army Corps of Engineers Aquatic Resources Delineation Report for the Fanita Ranch Project.” Addressed to C. Allen, U.S. Army Corps of Engineers. Encinitas, California. July 15.

## Comment Letter O6: Center for Biological Diversity, July 13, 2020



July 13, 2020

BY EMAIL

Chris Jacobs  
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Re: Fanita Ranch Project Revised EIR

Dear Mr. Jacobs:

Please accept the following comments regarding the Fanita Ranch Project Draft Revised EIR (DREIR) on behalf of the Center for Biological Diversity (the Center) and Endangered Habitats League (EHL). The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 70,000 members worldwide, including members in San Diego County and the City of Santee. EHL is a non-profit environmental organization dedicated to the conservation of native ecosystems and to sustainable land use and transportation planning. EHL has many members in San Diego County. Both the Center and EHL have a long history of involvement with land use issues in San Diego County, including previous iterations of the Fanita Ranch Project.

**I. THE DREIR RELIES ON A FUNDAMENTALLY FLAWED STATEMENT OF PROJECT OBJECTIVES.**

The CEQA Guidelines require an EIR to include a statement of objectives for a proposed project; the objectives must outline the underlying purpose of the project and assist in the development of project alternatives. (CEQA Guidelines § 15124(b).)

The DREIR's first and most detailed project objective ("Objective 1") is described as follows:

*Arizona • California • Colorado • Florida • Minnesota • Nevada • North Carolina • Oregon • Washington • Washington, DC*

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**O6**

**O6-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O6-2:** This comment states that the EIR relies on a fundamentally flawed statement of objectives. This is a heading statement that provides reasoning for this conclusion in the preceding paragraphs of this letter. Therefore, please refer to responses to comments O6-3 through O6-7 to address this comment.

**O6-3:** This comment states that the CEQA Guidelines require an EIR to include a statement of objectives for a proposed project and that these objectives must outline the purpose of the project and assist in the development of the project objectives. The City of Santee (City) concurs with this comment as a summary of CEQA Guidelines, Section 15124. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O6-4:** This comment claims the first project objective is flawed because it “requires that sweeping aspects of the Project” be designed in conformance with the Santee Draft

O6-1  
O6-2  
O6-3  
O6-4

Multiple Species Conservation Program (MSCP) Subarea Plan and that such plan is “not likely” to be approved by the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS). A lead agency has broad discretion in crafting project objectives (see, for example, California Oak Foundation v. Regents of University of California [2010] 188 Cal.App.4th 227, 276). The comment mischaracterizes Project Objective 1, which allows for a mixture of land uses “while preserving large blocks of significant natural open space areas as a habitat preserve dedicated to the City of Santee’s Draft Multiple Species Conservation Program Subarea Plan for permanent preservation and management.” Requiring the proposed project to be consistent with the City’s Draft MSCP Subarea Plan ensures that the City will be able to complete the Subarea Plan as contemplated in the MSCP and the City’s Enrollment Agreement for the Natural Community Conservation Planning program. It further ensures that projects processed by the City while the SAP is being completed are collectively contributing to the conservation of the species (per the minimum criteria in the MSCP), as opposed to mitigating impacts on a project-by-project basis. In other words, requiring the proposed project’s habitat preserve to be consistent with the Subarea Plan essentially requires the proposed project to be consistent with the MSCP, an approved regional plan.



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O6-4 cont. Create a new community with clustered development that provides residential, commercial, mixed-use, agricultural, and recreation land uses while preserving large blocks of significant natural open space areas as a habitat preserve dedicated to the City of Santee’s Draft Multiple Species Conservation Program Subarea Plan for permanent preservation and management.

O6-5 (DREIR at p. 3-2.) The objective is fundamentally flawed because it requires that sweeping aspects of the Project (including use designations, the Project footprint, and open space preserve) be designed in order to conform to a draft planning document—the City of Santee’s Draft Multiple Species Conservation Program Subarea Plan (MSCP Subarea Plan)—that is not likely ever to be finalized or approved by the requisite agencies, which include the U.S. Fish and Wildlife Service (USFWS or FWS). In correspondence obtained by EHL through a Freedom of Information Act Request, representatives of USFWS state that they had “made it clear that the Subarea Plan will not have our approval prior to the City’s consideration of the Fanita Ranch project,” calling the draft a “lousy plan.” (USFWS 2019 [email from USFWS Division Chief Carol Roberts], attached as Exhibit 1.) Additionally, the email correspondence shows that the City has notified the USFWS that it reserves the right to abandon the Subarea Plan and the Endangered Species Act Section 10 permitting process entirely for this Project after the Project is approved, in favor of seeking only Section 7 permits instead. (*Id.* at 3.) Moreover, the Center and EHL understand that the current draft version of the Subarea Plan was proposed by the Project Applicant and the City of Santee and specifically tailored to address this Project’s significant impacts to federally listed species.

O6-6 Thus, the MSCP Subarea Plan—which is critical to the DREIR’s first project objective—is a straw man and almost certainly will not be approved by the USFWS and adopted, and the City was well aware of this before it published the DREIR. Despite this critical shortcoming, the DREIR consistently relies on this flawed Project objective when evaluating alternatives. *In fact, the DREIR found that only the Project as proposed would meet Objective 1 and rejected all five of the other alternatives that it considered in the EIR on the grounds, in part, that they would not meet Project Objective 1.* (DREIR 6-7, [No Project/No Build Alternative would fail to meet Project Objective 1], 6-23 [same for No Project/General Plan Consistency Alternative], 6-38 [same for Modified Development Footprint Alternative], 6-52 [same for Fanita Commons Reduced Project Alternative], 6-67 [same for No Vineyard Village Reduced Project Alternative].)

O6-7 Because the DREIR’s first and most detailed project objective is fundamentally misleading and flawed, it affects the DREIR’s entire analysis, including its consideration and rejection of alternatives. (*See* CEQA Guidelines §§ 15126.4(a)(1), 15126.6(a); *see also* *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 669-670 [flawed and

Preliminary statements made by USFWS staff members are not and could not be determinative of whether or not the Draft Santee MSCP Subarea Plan will be approved by USFWS. Otherwise such statements would be impermissibly pre-decisional. No determination by USFWS has been issued regarding the Draft Santee MSCP Subarea Plan submitted to USFWS and CDFW in December 2018. The City is still in the process of considering and discussing input received from the agencies on the plan. Once that process concludes, the City would submit its application for a Section 10 permit for all covered projects in the City, including development of the proposed project. However, for the purposes of the EIR’s analysis of the proposed project, the Court of Appeal has already upheld reliance on the approved MSCP to conclude that cumulative biological impacts would be mitigated to a less than significant level (see *Preserve Wild Santee v. City of Santee* [2012] 210 Cal.App.4th 260, 278). Please also refer to Thematic Response – Santee MSCP Subarea Plan for additional discussion of this topic.

**O6-5:** This comment claims the proposed project may rely on the Section 7 process as opposed to obtaining take coverage for impacts to species under an approved MSCP Subarea Plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR.

Therefore, no further response is required on this point. Nonetheless, Section 4.3.2.3 of the EIR recognizes that, “if the Draft Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit.” The Fanita Ranch Subunit would represent over half of the Santee MSCP Subarea Plan Preserve System and includes habitat for a number of Covered Species. The proposed project was designed to be consistent with the City’s Draft MSCP Subarea Plan, which, as the EIR recognizes, has not yet been approved or permitted. However, the plan is used by the City as the guidance document for projects occurring in the City. The proposed project’s mitigation does not rely on the completion of the Draft Santee MSCP Subarea Plan, however, and adoption of the Draft Santee MSCP Subarea Plan is not assumed or required for the approvals for the proposed project. See also response to comment O6-4 and Thematic Response – Santee MSCP Subarea Plan for further details.

- O6-6:** This comment claims Project Objective 1 is flawed as it relates to the Draft Santee MSCP Subarea Plan, that such plan is not likely to be approved by CDFW and USFWS, and an adequate alternatives analysis has been precluded. See response to comment O6-4 and Thematic Response – Santee MSCP Subarea Plan for further details. Because

there is no flaw in Project Objective 1, an adequate alternatives analysis in the EIR has not been precluded.

This comment also mischaracterizes the conclusions in the EIR regarding the ability of the alternatives to satisfy Project Objective 1 as it relates to the Draft Santee MSCP Subarea Plan. The analysis concludes that, similar to the proposed project, the alternatives would not conflict with the provisions of the City's Draft MSCP Subarea Plan. None of the alternatives were deemed unable to meet Project Objective 1 based on the Habitat Preserve consistency aspect of that objective. The only exception is the No Project/No Build Alternative, which would not benefit from large blocks of open space actively managed as Habitat Preserve because the site would remain unmanaged and continue to be susceptible to degradation over time (see Section 6.2.1.2 of the EIR).

- O6-7:** This comment claims Project Objective 1 is flawed as it relates to the Draft Santee MSCP Subarea Plan, that such plan is not likely to be approved by CDFW and USFWS, and an adequate alternatives analysis has been precluded. See response to comment O6-4 and O6-6 and Thematic Response – Santee MSCP Subarea Plan. Because there is no flaw in Project Objective 1, an adequate alternatives analysis in the EIR has not been precluded, and no revision to or recirculation of the EIR under CEQA Guidelines, Section 15088.5, is required.

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O6-7  
 cont.

impermissibly narrow statement of project objectives rendered EIR invalid.) Project Objective 1 should be removed from the DREIR and the DREIR should be recirculated for public review and comment.

**II. BIOLOGICAL RESOURCES**

**A. The DREIR fails to adequately assess and mitigate impacts to western spadefoot toads (*Spea hammondi*) and vernal pools.**

O6-8

The DREIR fails to adequately assess and mitigate impacts to western spadefoot toads (*Spea hammondi*), a species of special concern, a covered species under the Draft Santee MSCP Subarea Plan, and a species that is under review for listing under the Federal Endangered Species Act. The Biological Technical Report states that the Project area contains 395.24 acres and 242 features with potential to support spadefoots, with 38 features having confirmed occupation (DREIR Appendix D Biological Technical Report Table 5-4a at 347). However, this differs from information presented in Appendix N of the report, which shows a total of 42 identified occupied pools from 2004, 2005, and 2017 surveys in the Project area. In addition, Table 5-4a refers to mitigation measures BIO-3 and BIO-8 as the Vernal Pool Mitigation Plan and Relocation Plan, but in the main text of the DREIR those are BIO-12 and BIO-13, respectively. This is confusing because the information and the mitigation measures do not match. And it is unclear if the 42 occupied features are included in the acreage calculations for existing and impacted suitable and/or occupied habitat within the Project area.

O6-9

In addition, the methodology to identify potential suitable spadefoot habitat in the Project area is flawed. The Biological Technical Report states there are approximately 395.24 acres of suitable habitat for western spadefoot toads in the Project area, based on models that included the following criteria: “within 984 feet (300 meters) of occupied features; within vernal pool, open woodlands, non-native grassland, native grassland, coastal sage scrub, or other open lands; and less than 20% slope” (DREIR Appendix D Biological Technical Report at 222). It is unclear if the 300-meter buffer is applied to vernal pools that do not have confirmed spadefoot occurrences. The report goes on to state that the 300-meter buffer was chosen because “it lies in the suggested USGS buffer range and it captures the maximum distance (262 meters) western spadefoots were observed from breeding habitat in the Baumberger et al. 2019 study” (DREIR Appendix D Biological Technical Report at 222). Although this is a good start, it is insufficient to fully capture the potential travel distance of spadefoots from breeding pools; accordingly, the Project could be impacting a much greater area of spadefoot habitat needed for the entire life cycle and metapopulation dynamics. While Baumberger et al. (2019) documented spadefoots traveling up to 262 meters, the authors acknowledge that the study was limited due to small sample size (n=15 adults, no dispersing metamorphs), male bias (80% were male), the study was conducted

O6-10

**O6-8:** This comment states that the EIR fails to adequately assess and mitigate impacts to western spadefoot (*Spea hammondi*). Please refer to Thematic Response – Western Spadefoot.

This comment notes a difference in the number of occupied features (i.e., pools) listed in the Biological Resources Technical Report (Appendix D to the EIR), with 38 features, and Appendix N in the Biological Resources Technical Report, with 42 features, respectively. Both numbers are correct. Appendix N in the Biological Resources Technical Report (Appendix D) provides the number of occupied western spadefoot pools per year, which should not be summed due to duplicate counting of four pools across multiple years. Therefore, the Biological Resources Technical Report (Appendix D) correctly states that there is a total of 38 distinct occupied pools.

**O6-9:** This comment states there is a discrepancy in the “BIO” mitigation measure numbering between the EIR and the Biological Resources Technical Report (Appendix D). Table 6-1 in the Biological Resources Technical Report (Appendix D) provides a crosswalk for the numbering of the mitigation measures used in the EIR and Biological Resources Technical Report (Appendix D). Therefore, the mitigation measures numbering in the EIR and the

Biological Resources Technical Report (Appendix D) are both correctly stated.

This comment also states that it is unclear if the 42 occupied features are included in the acreage calculations for existing and impacted suitable habitat and/or occupied habitat ON the project site. As noted in response to comment O6-8, there are 38 distinct occupied pools that were used in the impact analysis for the proposed project. The City disagrees that the number of occupied features in the impact analysis was not clearly stated. Table 4.3-8, Direct Impacts to Special-Status Wildlife Species, states that a total of 24 occupied features would be conserved in the Habitat Preserve and 14 occupied features would be impacted by the proposed project (i.e., summing to 38 occupied features). Table 4.3-8 also includes the impact and conservation acreages for suitable habitat for western spadefoot.

- O6-10:** This comment states that the methodology to identify potential suitable spadefoot habitat in the project area is flawed. The City disagrees with this comment. The Biological Resources Technical Report (Appendix D) was prepared by biological experts and reflects the best available science as to the appropriate methodology to use for this purpose.

This comment states that it is unclear if the 300-meter buffer is applied to unoccupied vernal pools and

reiterates text from the Biological Resources Technical Report (Appendix D) regarding the modeled suitable habitat parameters: within 984 feet (300 meters) of occupied features; within vernal pool, open woodlands, non-native grassland, native grassland, coastal sage scrub, or other open lands; and less than 20 percent slope. The City disagrees that the 300-meter buffer parameter was unclear. As stated in Table 3-2, Suitable Habitat Models for Special-Status Wildlife Species Present or with Moderate Potential to Occur within the Project Area (including Off-site Areas), in the Biological Resources Technical Report (Appendix D), a 300-meter buffer around occupied pools was used for the western spadefoot suitable habitat model.

This comment raised the issue that the 300-meter buffer is “insufficient to fully capture the potential travel distance of spadefoots from breeding pools; accordingly, the project could be impacting a much greater area of spadefoot habitat needed for the entire life cycle and metapopulation dynamics.” The model parameter of 300 meters is based on the best available movement and habitat selection data for western spadefoot in the Southern California region based on Baumberger et al. (2019), which was cited in the Biological Resources Technical Report (Appendix D) and satisfies CEQA requirements for best available data. The 300-meter parameter is also consistent with the general

recommendations of USFWS and U.S. Geological Survey. Please refer to Thematic Response – Western Spadefoot for details on the methods used to identify suitable habitat for western spadefoot.

This comment states that the Baumberger et al. (2019) study was limited due to a small sample size conducted during a drought year with study sites that were spatially close together, which does not depict the full range of movement. The City disagrees with this comment. Based on studies, such as Baumberger et al. (2019) and Semlitsch and Bodie (2003), for amphibians in general, while the 230 acres of impacted modeled habitat, based on a 300-meter buffer, likely does not fully capture 100 percent of the habitat that could be used by western spadefoot on the project site, the literature supports the conclusion that this buffer sufficiently captures the core upland habitat that supports the large majority of spadefoots on site, and the habitat most critical for maintaining the viability of the local breeding sites. Please refer to Thematic Response – Western Spadefoot for details.

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during a drought year, and the study sites were spatially close together on the coast; therefore, while informative, the study is limited and may not depict the full range of western spadefoot movement.

O6-11

Baumberger et al. (2019) found that rainfall was a significant driver of spadefoot movement and distance traveled, which suggests that in years with heavier rainfall western spadefoots may travel further than the 262-meter maximum recorded in a drought year. And according to Dr. Steven Morey, a herpetologist at the USFWS, western spadefoots are capable of traveling distances of at least 1 kilometer and perhaps much more (Laabs, Orloff, & Allaback, 2002). Species closely related to western spadefoots have been found to travel much farther distances than 262 meters. For example, Timm et al. (2014) found adult eastern spadefoot (*S. holbrookii*) migrating up to 449 meters from breeding pools, and Richardson and Oaten (2013) showed that Great Basin spadefoot (*S. intermontana*) move up to 2350 meters from breeding pools (as cited by Baumberger et al. 2019). When determining potentially suitable habitat, the furthest dispersers should be considered in the model. Thus, criteria of habitat modeling for potential spadefoot habitat should include vernal pools and upland habitat within 1 kilometer. By incorporating upland habitat within only 300 meters of occupied features (and presumably other potential breeding wetlands, though it is unclear), the DREIR could be severely underestimating the amount of suitable spadefoot habitat, and therefore severely underestimating impacts to spadefoots and spadefoot habitat due to the proposed Project. In addition, permanent and temporary impacts remove and fragment large areas of contiguous modeled habitat for spadefoot (DREIR Figure 4.3-5), which could render the smaller, isolated patches of habitat less ecologically functional for spadefoots and metapopulation dynamics. Thus, impacts could extend beyond the estimated ~230 acres of modeled suitable habitat and 14 occupied features (DREIR Table 4.3-8a at 4.3-49). The DREIR fails to adequately describe and assess potential impacts to western spadefoot.

O6-12

The DREIR lists numerous mitigation measures that the proponent claims would mitigate impacts to western spadefoot to less than significant, including MM BIO-1 (Preserve Management Plan), 2 (Upland Restoration Plan), 12 (Vernal Pool Mitigation Plan), 13 (Western Spadefoot Relocation Plan), and 19 (African clawed-frog trapping); however, these mitigation measures do not incorporate the best available science and are insufficient to mitigate the Project's impacts to western spadefoot to less than significant.

O6-13

The DREIR undercuts mitigation for impacts to western spadefoots and their habitat by relying on a mish-mash of compensatory mitigation (preserved, restored/enhanced, created) for sensitive habitats and vernal pools instead of specifically providing a mitigation ratio for impacts to occupied and modeled spadefoot habitat. MM BIO-1 provides insufficient mitigation ratios for permanent impacts to numerous sensitive habitats separately, requiring a range of mitigation

**O6-11:** This comment suggests that, in years with heavier rainfall, spadefoot may travel further than the Baumberger et al. (2019) study found to be the maximum. The model parameter of 300 meters is based on the best available movement and habitat selection data for western spadefoot in the Southern California region based on Baumberger et al. (2019), which was cited in the Biological Resources Technical Report (Appendix D) and satisfies CEQA requirements for best available data. Please refer to Thematic Response – Western Spadefoot for further details.

**O6-12:** This comment states the EIR mitigation measures are insufficient to mitigate the proposed project's impacts to western spadefoot to less than significant and do not incorporate the best available science. The City disagrees with this comment. The mitigation measures were prepared by biological experts and reflect their knowledge of the western spadefoot's life history needs, based on the scientific literature and their direct experience with the species, as to the appropriate mitigation measures to use for this purpose and as to their opinion that the mitigation measures reduce impacts to less than significant. The mitigation strategy should be taken as a whole and includes a combination of preservation of existing resources, restoration, and enhancement of currently unsuitable habitat and long-term monitoring and adaptive management of resources,



including threat reduction. Please refer to Thematic Response – Western Spadefoot for details on mitigation. It is also noted that the comment’s statement that the conclusions about the effectiveness of the western spadefoot mitigation are “proponent claims” is incorrect. As stated above, these determinations were made by expert biologists, who are certified by the County of San Diego, preparing the Biological Resources Technical Report (Appendix D) and EIR biological analysis.

- O6-13:** This comment states that the EIR undercuts mitigation for impacts to western spadefoot and their habitat by relying on a “mish-mash of compensatory mitigation” for sensitive habitats and vernal pools and should instead have specifically provided a mitigation ratio for impacts to occupied and modeled spadefoot habitat. The City disagrees with this comment. The mitigation strategy was prepared by biological experts and reflects their opinion as to the appropriate suite of mitigation measures to reduce impacts to less than significant. CEQA does not specify required approaches to accomplish mitigation or mitigation ratios that must be met to reduce impacts to a level less than significant. Rather than only focusing on mitigation ratios, the mitigation strategy should be taken as a whole; that is, the EIR recommends a mitigation strategy using a combination of preservation of existing resources, restoration and enhancement of currently unsuitable

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O6-13 cont. ratios of 1:1 or 3:1. But given that spadefoots can inhabit a variety of upland habitats from vernal pools, it is difficult to decipher how MM BIO-1 would account for the preservation of 146.24 acres of modeled suitable habitat (DREIR Appendix D Biological Technical Report Appendix P Table 6 at 47), which is only a dismal and inadequate 37% of modeled suitable habitat. And although 24 (documented) occupied features would be within the Habitat Preserve, a number of them seem to be located in close proximity to areas of permanent and temporary impacts (DREIR Figure 4.3-5) It is difficult to determine if those breeding pools have adequate upland buffers and connectivity to sustain life cycle needs and metapopulation dynamics. Ideally, buffers should accommodate the furthest dispersers, as larger buffers would allow for increased chances for establishment or re-establishment in unoccupied habitats, as often happens in metapopulation dynamics, or to increase resilience to climate change (Cushman, 2006; Semlitsch & Bodie, 2003). For western spadefoots, that should be a 1-kilometer buffer. At a minimum, the DREIR should require 400-meter buffers of upland habitat for known, occupied breeding pools, as recommended by the USGS (DREIR Appendix D Biological Technical Report at 222), taking measures preserve connectivity between multiple breeding pools. Thus, while there is some preservation of modeled suitable habitat and known breeding pools, those habitats could become degraded over time due to being in close proximity to human activity (*i.e.*, edge effects) and isolated from other potential breeding pools and upland habitat.

O6-14 MM BIO-2 addresses temporary impacts, requiring a 1:1 mitigation for “in-place restoration” and 1:1 preservation/creation of native grassland within the Habitat Preserve, with only five years of monitoring, no adaptive management strategy, no defined, measurable success criteria, and minimal requirements for buffers. And although, MM BIO-12 requires mitigation ratios of 4:1 for impacted natural vernal pools, 3:1 for road cuts with indicator plants, and 2:1 cuts with indicator wildlife (*i.e.*, western spadefoots and San Diego fairy shrimp [*Branchinecta sandiegonensis*]), the total acreage of required mitigation adds up to only 0.5 acres of vernal pools, which is grossly insufficient and does not take into account associated upland habitat required by rare and sensitive species like western spadefoots. Allocating mitigation in this way neglects the ecological function of connected, intact, heterogeneous habitats. The proposed Project would impact over 230 acres of modeled suitable habitat and 14 occupied features (DREIR Table 4.3-8a at 4.3-49); mitigation of 0.5 acres of vernal pools does not account for the associated upland habitat western spadefoots need. In addition, 80% of the mitigation would be created habitat, which is unacceptable. The DREIR fails to adequately assess and mitigate impacts to western spadefoots.

O6-15 Given the importance of vernal pools and associated upland (heterogeneous) habitat to western spadefoots and numerous other native, rare, and special-status animals and plants, connectivity, and overall biodiversity, the DREIR should provide higher mitigation ratios specific to permanent and temporary impacts to historical, occupied, and potentially suitable

habitat, and long-term monitoring and adaptive management of resources, including threat reduction. The EIR concludes that the recommended mitigation reduces impacts to western spadefoot to less than significant. Please refer to Thematic Response – Western Spadefoot for details on mitigation.

**O6-14:** This comment states that mitigation of 0.5 acre of vernal pools does not account for the associated upland habitat western spadefoots need. The mitigation provided includes a minimum of 0.50 acre and up to 2.92 acres of vernal pool mitigation, which would provide up to an 8:1 mitigation ratio for areal extent of suitable western spadefoot breeding habitat impacted by the proposed project. Additional upland mitigation would be provided by EIR Mitigation Measure BIO-1 (Preserve Management Plan). Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces impacts to western spadefoot to less than significant. Please refer to Thematic Response – Western Spadefoot for further details on mitigation.

**O6-15:** This comment states that the EIR should provide higher mitigation ratios specific to permanent and temporary impacts to historical, occupied, and potentially suitable western spadefoot habitat. CEQA does not specify required mitigation ratios that must be met to reduce

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spadefoot habitat. In addition, mitigation ratios need to take the types of mitigation to be implemented into consideration, as not all mitigation is created equal. Preservation of existing habitat where sensitive and/or special-status species are known to occur through avoidance should be the primary focus, as restoration, enhancement, and creation of habitats can have limited success due to the challenges of establishing the appropriate hydrology (Matthews & Endress, 2008; Stein, Edelson, Anderson, Kanter, & Stemler, 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007). Restoring complex ecosystems like ephemeral wetlands often results in reduced ecological function. In studies conducted in California on wetland mitigation sites permitted between 1979 and 2002, less than 20% of mitigated wetlands were performing optimally (Ambrose, Callaway, & Lee, 2006; Sudol & Ambrose, 2002).

O6-16

Scientific studies specifically speak to the need for higher mitigation ratios (along with long-term monitoring, identified and measurable success criteria, and adaptive management strategies) to improve chances of adequately mitigating impacts to habitats and species (Matthews & Endress, 2008; Mitsch & Wilson, 1996; Moilanen, Van Teeffelen, Ben-Haim, & Ferrier, 2009; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007; Zedler & Callaway, 1999). The western spadefoot's continued survival relies on created wetlands having the appropriate hydrological and biological conditions and adequate upland habitat. The DREIR needs to take into account that, due to the proposed Project, habitat loss and species displacement are immediate, while any gains from their mitigation is uncertain. Moilanen et al. (2009) found that "very high offset ratios may be needed to guarantee a robustly fair exchange" and that "considerations of uncertainty, correlated success/failure, and time discounting should be included in the determination of the offset ratio to avoid a significant risk that the exchange is unfavorable for conservation in the long run." This is exemplified in a recent study that found successful western spadefoot breeding in only 33% (7 out of 21) of constructed vernal pools 10 years after they were constructed (Baumberger, Backlin, Gallegos, Hitchcock, & Fisher, 2020). In addition, the six-year maintenance and monitoring period for created vernal pools is insufficient to guarantee they are on a trajectory to become as ecologically functional as the lost habitat; some scientists recommend 15-20 years or more of monitoring to determine the success, or lack thereof, of enhanced, restored, or created habitat (Mitsch & Wilson, 1996; Zedler & Callaway, 1999). Therefore, higher mitigation ratios coupled with extended years of effective monitoring and adaptive management strategies are needed to improve chances of achieving no net loss of habitats like wetlands (Ambrose et al., 2006; Moilanen et al., 2009; Sudol & Ambrose, 2002). The City of San Diego recognizes the importance of vernal pools (and associated upland habitat) and the species that rely on these habitats; their Vernal Pool Habitat Conservation Plan requires 4:1 mitigation for when no listed species are present and 8:1 when listed species are present (City of San Diego, 2019). Although the western spadefoot is not currently a listed species, they have been extirpated from at least 80% of their range in Southern California, are a covered species in the Santee MSCP Subarea Plan, are being considered for

impacts to a level less than significant. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces impacts to western spadefoot to less than significant. Please refer to Thematic Response – Western Spadefoot for details on the project-specific mitigation program.

**O6-16:** This comment states that scientific studies speak to the need for higher mitigation ratios to improve adequate mitigation for impacts to habitat and species. CEQA does not specify required mitigation ratios that must be met to reduce impacts to a level less than significant. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces impacts to western spadefoot (vernal pools and other aquatic resources as well as sensitive upland habitats) to less than significant. Please refer to Thematic Response – Western Spadefoot.

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listing under the Federal Endangered Species Act, and are considered a species of special concern by CDFW; they should be afforded more protections before they become extinct throughout the area. The DREIR fails to consider the best available science and adequately assess and mitigate impacts to western spadefoots and vernal pools (and other aquatic resources and sensitive habitats).

O6-17

If compensatory mitigation includes enhanced, restored, or created habitats, higher mitigation ratios coupled with extended years of effective monitoring and adaptive management strategies are needed to improve chances of establishing equivalent ecological function as the lost habitat for species like western spadefoot (Ambrose et al., 2006; Bronner et al., 2013; Matthews & Endress, 2008; Moilanen et al., 2009; Stein et al., 2018; Sudol & Ambrose, 2002; Windmiller & Calhoun, 2007). The mish-mash of mitigation ratios provided in mitigation measures BIO-1, 2, and 12 for preservation, restoration/enhancement, or created habitat are insufficient to mitigate impacts to western spadefoots and vernal pools to less than significant. Given that western spadefoots have been extirpated from 80% of their range in Southern California (USFWS 2005; Stebbins and McGinnis 2012) and amphibian populations in the U.S. are declining at an alarming rate of almost 4% per year (Grant et al., 2016), greater mitigation measures based on the best available science are needed. Mitigation for aquatic resources like vernal pools (and associated upland habitats) should be at least 3:1 with in-kind preservation, 5:1 with restoration/enhancement, and 10:1 with created habitat. All mitigation (preservation, restoration/enhancement, creation of vernal pools and associated upland habitat for western spadefoots) should be implemented in consultation with local and regional biologists, indigenous groups, and government agencies, and protected in perpetuity, and the mitigation on these lands should include funded long-term monitoring, specified measurable success criteria, and adaptive management strategies. In addition, hydroperiods of at least 30 days and successful breeding (documentation of metamorphs leaving the pools) should be included in the success criteria for created pools, not just if the areas are occupied. If adults breed in pools with less than 30-day hydroperiods then any larvae in the pools are unlikely to metamorph before the pools dry up, which would eventually lead to local extirpation. If higher mitigation ratios are not feasible, the DREIR must provide evidence and analysis supporting that conclusion.

O6-18

Although MM BIO-13 states that a Western Spadefoot Relocation Plan is included in Appendix R, we were unable to locate it. Having such specific mitigation information omitted or buried within an appendix to an appendix is disconcerting. It is important to have the details easily accessible to the general public so that they can understand how such mitigation would be implemented. As we were unable to locate the Spadefoot Relocation Plan, we evaluate the plan based on the information provided in the DREIR. The DREIR provides the following regarding spadefoot relocation:

**O6-17:** This comment states that higher mitigation ratios coupled with extended years of effective monitoring and adaptive management strategies are needed to improve chances of establishing equivalent ecological functions as the lost habitat for species like western spadefoot when mitigation includes enhanced, restored or created habitats. The mitigation strategy should be taken as a whole; that is, a combination of preservation of existing resources, restoration and enhancement of currently unsuitable habitat, and long-term monitoring and adaptive management of resources, including threat reduction. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces impacts to western spadefoot to less than significant. Please refer to Thematic Response – Western Spadefoot.

The comment recommends that a hydroperiod of at least 30 days be included in the success criteria for the created pools. Based on the opinion of the biological experts who prepared the analysis, as well as the overall biological objectives of the Vernal Pool Mitigation Plan, the comment’s recommended success criteria have not been included in the EIR. In order to guarantee that all the pools hold water for at least 30 days, even in an above average rainfall year, they would all have to be made relatively deep, which would not be conducive to the development of a naturally diverse floral and faunal complex and would certainly preclude the

introduction of sensitive species other than those that are more aquatic such as western spadefoot. For example, the introduction of plant species, like the San Diego mesa mint (*Pogogyne abramsii*), would be limited by the deeper pools. The mitigation design will include pools that will be expected to pond (in an average rainfall year) anywhere from 2 to 4 weeks, and this will be tied to specific success criteria in the mitigation plan. Please refer to Thematic Response – Western Spadefoot for details.

**O6-18:** This comment states that the Western Spadefoot Relocation Plan could not be located in Appendix R, Vernal Pool Mitigation Plan, to the Biological Resources Technical Report (Appendix D). The Western Spadefoot Relocation Plan is outlined in Section 8.4.3 of the Vernal Pool Mitigation Plan; it is not a separate, stand-alone plan. The City agrees further clarification is warranted and has revised Mitigation Measure BIO-13 in the EIR as follows to clarify that the relocation effort is not a separate, stand-alone plan, but is included in the Vernal Pool Mitigation Plan. This measure is also being modified to address a different comment from USFWS, and the text shown below includes those modifications, as well as the above clarification.

**BIO-13: Western Spadefoot Relocation.** During the wet season prior to clearing or grading operations, biologists shall collect western spadefoot adults from areas within 300 meters of known occupied pools. Adults shall either be held by a U.S. Fish and Wildlife

~~Service or California Department of Fish and Wildlife-approved biologist to be released back onto the site after construction activities using standard methods or be relocated to another area on the project site that has suitable breeding habitat and few or no western spadefoot individuals.~~

~~A Western Spadefoot Relocation Plan is~~ Details on the western spadefoot relocation effort are included as a component of the Vernal Pool Mitigation Plan (included in the Biological Technical Report for the Fanita Ranch Project as Appendix R), available to the U.S. Geological Survey (USGS) for review, and is subject to approval by the wildlife agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife) . . .

The comment also states that the EIR fails to adequately mitigate impacts to western spadefoot. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces impacts to western spadefoot to a less than significant level. Please refer to Thematic Response – Western Spadefoot.

The comment also states that the EIR fails to adequately assess impacts to western spadefoot. However, the comment provides no further information on the basis of this aspect of the comment, beyond the comments on the

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O6-18  
cont.

BIO-13: Western Spadefoot Relocation. During the wet season prior to clearing or grading operations, biologists shall collect western spadefoot adults from areas within 300 meters of known occupied pools. Adults shall either be held by a U.S. Fish and Wildlife Service or California Department of Fish and Wildlife-approved biologist to be released back onto the site after construction activities using standard methods or be relocated to another area on the project site that has suitable breeding habitat and few or no western spadefoot individuals.

A Western Spadefoot Relocation Plan is included as a component of the Vernal Pool Mitigation Plan (included in the Biological Technical Report for the Fanita Ranch Project as Appendix R) and is subject to approval by the wildlife agencies (U.S. Fish and Wildlife Service and California Department of Fish and Wildlife). The Western Spadefoot Relocation Plan includes, at a minimum, the following elements:

- The timing and methods for surveying, capturing, and releasing adults. Long-term care methods shall also be discussed if this option is used.
- Collection shall occur during the first three or four large rain events of the season. Ideally, these rain events shall produce a minimum of 0.20 inch during a 24-hour period. (DREIR a 4.3-93)

As mentioned previously, it is likely that spadefoots move up to 1 kilometer or more from breeding pools (Laabs et al., 2002); therefore, spadefoots should be collected from areas within 1 kilometer of impacted potential breeding pools, not just known occupied pools, as spadefoots may be present and just not detected, and metapopulations can shift and previously unoccupied habitat may become occupied in the time between when surveys were conducted and construction begins. Relocation sites should include breeding pools with appropriate hydrological and biological conditions *and* adequate upland habitat connected to a regional mosaic of vernal pools to improve their chances of long-term survival. Spadefoots prefer areas of open vegetation and short grasses, where soil is sandy and friable for burrowing (Jansen, Summers, & Delis, 2001; USFWS, 2005). If no burrowing habitat is available, toads will disperse further away from pools in search of their preferred substrate, which could lead to increased mortality and potentially no breeding functionality of a chosen relocation pool (Germano & Bishop, 2009; Jansen et al., 2001). In addition, Germano and Bishop (2009) found that the success or failure of amphibian translocations were significantly related to the number of individuals released, homing/migration behaviors, and habitat quality. These factors must be considered when developing and implementing a relocation plan to improve chances of population establishment and adequate gene flow. The DREIR fails to adequately assess and mitigate impacts to western spadefoot.

relocation effort as a component of the overall mitigation strategy, which are addressed in this response. The assessment of impacts to western spadefoot was prepared by biological experts and reflects their professional opinion as to the proper assessment of those impacts.

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O6-19

It is unclear where relocation sites would be, if they will be natural, enhanced/restored, or created sites, if they would have appropriate hydrological and biological conditions, and if they would have sufficient and suitable upland habitat and connectivity. In addition, it is unclear what will be done to mitigate impacts to spadefoots should relocation be required during a drought year. These toads stay in burrows up to 0.9 meters deep (Ruibal, Tevis, & Roig, 1969), and although the factors that stimulate emergence are not well understood, it is possible that sound or vibration from rain striking the ground may be the primary cue for the toads to emerge (USFWS, 2005). How will the Project proponent coerce spadefoots to emerge from their burrows if there are no rain events or the rain events are insufficient when construction is slated to begin? The DREIR fails to adequately assess and mitigate impacts to western spadefoots.

O6-20

According to the Vernal Pool Mitigation Plan (MM BIO-12), performance standards for western spadefoots will be based on simple occupation determination: "Adults, juveniles, larvae, and eggs clutches all are indicators of use" (DREIR Appendix D Biological Technical Report Appendix R at 59). However, successful breeding events that include documentation of metamorphs leaving the pools should be included in the success criteria for created pools and relocated spadefoots. This is important because if adults breed in pools with less than 30-day hydroperiods then any larvae in the pools are unlikely to metamorph before the pools dry up, which could eventually lead to local extirpation. Extended monitoring and adaptive management of restored, enhanced, or created vernal pools and relocated spadefoots should be implemented; five to six years of monitoring is likely not enough time to determine the functional equivalency of created wetlands to removed wetlands or the future survival of the western spadefoot populations (Germano & Bishop, 2009; Mitsch & Wilson, 1996; Zedler & Callaway, 1999). The Vernal Pool Mitigation Plan and Western Spadefoot Relocation Plan must consider the time it takes for created wetlands to have their intended functionality, the need for appropriate upland terrestrial habitat for species survival, and the importance of measuring performance criteria indicative of habitat functionality and species behavior and life history. The DREIR fails to adequately assess and mitigate impacts to western spadefoots and vernal pools.

O6-21

Without the relocation plan provided in the Vernal Pool Mitigation Plan, this amounts to improperly deferred mitigation (see *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 670 [EIR inadequate where the success or failure of mitigation efforts "may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR"]. In the limited circumstances in which deferred mitigation is appropriate, the agency must meet all of the following elements: (1) practical considerations prevented the formulation of mitigation measures during the planning process; (2) the agency committed itself to developing mitigation measures in the future; (3) the agency adopted specific performance criteria prior to project approval; and (4) the EIR lists the mitigation measures to be considered, analyzed, and possibly incorporated into the mitigation

O6-22

**O6-19:** This comment states that it is unclear where relocation sites would be, if they would have appropriate hydrological and biological conditions, and if they would have sufficient and suitable upland habitat and connectivity.

Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D) outlines the implementation procedure for restoring habitat and implementing the restoration and enhancement program (refer to Section 5.5 of Appendix R). Implementation of restoration and relocation plans includes western spadefoot translocation, inoculum/seed salvage and collection, vernal pool native plant seed collection and bulking program, site preparation (fence installation, dethatching, and invasive removal), plant salvaging, site contouring and grading, and hydrological testing. Implementation of mitigation would occur within the proposed project's hardline Habitat Preserve (see Section 2.3 of Appendix R). Therefore, the EIR includes a description of the relocation sites, procedures for appropriate restoration hydrological and biological conditions, and installation of native and suitable upland habitat sufficient and connected to suitable habitat.

The comments concerning the details of a relocation plan, such as timing of collection efforts, the scope of the collection area, appropriate relocation sites, etc. are all important considerations for a final relocation plan to be



approved by the wildlife agencies. As required in Mitigation Measure BIO-13, the final relocation effort is subject to approval by the wildlife agencies. The details provided in the EIR as to the relocation effort were developed by biological experts and reflect their opinion that the description of the relocation effort is sufficient for CEQA purposes to support the conclusion that the impacts to the species are less than significant with this and other proposed mitigation. As part of the required approval process under Mitigation Measure BIO-13, the wildlife agencies shall review and typically shall add additional refinements to the relocation procedures per their jurisdictions under the species protection laws. Any more restrictive measures these agencies impose would also be implemented.

- O6-20:** This comment states that it is unclear what will be done to mitigate impacts to western spadefoots should relocation be required during a drought year. Based on the opinion of the biologist experts who prepared the description of the relocation effort and the impact conclusion for this species, the western spadefoot relocation component of the Vernal Pool Mitigation Plan (Appendix R of the Biological Resources Technical Report [Appendix D]) is sufficient for CEQA purposes to support the conclusion that the impacts to the species are less than significant with this and other proposed mitigation. As part of the required approval process under

Mitigation Measure BIO-13, the wildlife agencies will review and typically will add additional refinements to the relocation procedures per their jurisdictions under the species protection laws. Any more restrictive measures these agencies impose will also be implemented.

**O6-21:** This comment states that documentation of metamorphs leaving the pools should be included in the success criteria for created pools and relocated western spadefoots and questions the monitoring duration. Based on the opinion of the biologist experts who prepared the analysis and impact conclusion for this species, the western spadefoot relocation component of the Vernal Pool Mitigation Plan (Appendix R of the Biological Resources Technical Report [Appendix D]), and Section 8.4.3 in particular, is sufficient for CEQA purposes to support the conclusion that the impacts to the species are less than significant with this and the other mitigation. Proof of metamorphs leaving the pools is not necessary nor practicable. In order to implement this kind of intensive monitoring, each pool would need to be enclosed by silt fence and multiple daily visits made by biologists to merely document their presence against the fence – presumably indicating that they were leaving the particular pool. The resulting matrix of silt-fence that would encircle up to 100 or more restored or enhanced pools (many of which would abut one another; see Figure 4 in Appendix R of the Biological Resources

Technical Report [Appendix D]) and would result in an untenable mass of silt fencing that would cause unanticipated impacts on its own. Each silt-fence area would need to be dug into the ground and compacted, thus disrupting the integrity of the enhancement efforts and long-term habitat suitability, and the network would constrain other reptile, small mammal, amphibian and invertebrate larvae movement across the area.

The comment also states that 5 to 6 years of monitoring is likely not enough time to determine functional equivalency of the wetlands or the future survival of the western spadefoot. The City disagrees that only five or six years of monitoring will occur. According to the Vernal Pool Mitigation Plan (Appendix R to the Biological Resources Technical Report [Appendix D]) Section 7, 7 years of vernal pool monitoring would occur in the Habitat Preserve for the created, restored, and enhanced vernal pools. Based on the experience of the expert biologists who developed the mitigation plan, this is enough time to determine if the enhancement/restoration has been successful and additional success criteria is not necessary. Additionally, the vernal pools included in the Habitat Preserve would be managed according to the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]), which will be implemented in-perpetuity. As discussed in Table 2 and Section 4.2.5 of Appendix P (Preserve Management Plan) to Appendix D (Biological

Resources Technical Report), additional species monitoring will occur at 5-year intervals and threat surveys performed at 3-year intervals in perpetuity. These will be consistent with SDMMMP monitoring protocols. Please refer to Thematic Response – Western Spadefoot.

- O6-22:** This comment states that the lack of adequate details regarding the Western Spadefoot Relocation Plan does not allow the public and decision makers to evaluate the effectiveness of the proposed mitigation measure. As noted in responses to comments O6-18 through O6-21, details of the relocation effort are set out in the Vernal Pool Mitigation Plan (Appendix R of the Biological Resources Technical Report [Appendix D]). In the opinion of the expert biologists who prepared the relocation measures, the details in the Vernal Pool Mitigation Plan are sufficient to support the conclusion that impacts are less than significant with this and other proposed mitigation. Also as noted above, additional details of the relocation methods will be developed with input from the wildlife agencies responsible for protecting this species. As required in Mitigation Measure BIO-13, the final relocation plan is subject to approval by the wildlife agencies. Please refer to Thematic Response – Western Spadefoot.

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O6-22  
 cont.

plan. (See *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 736-37 [review denied].) Here, the DEIR fails to meet these criteria in the discussion to mitigate the Project’s impacts on western spadefoots. The lack of adequate details regarding the Western Spadefoot Relocation Plan does not allow the public and decisionmakers to evaluate the effectiveness of the proposed mitigation measure; therefore, the DREIR violates CEQA. The DREIR should be revised and recirculate to address these insufficiencies.

**B. The FEIR fails to adequately describe, assess, and mitigate impacts to coastal California gnatcatchers (*Poliophtila californica californica*) and their designated critical habitat.**

O6-23

Almost the entire Project area is within designated critical habitat for coastal California gnatcatchers (DREIR Appendix D Biological Technical Report Figure 2-1), a species that is federally threatened, a CDFW species of special concern, and a covered species under the Draft Santee MSCP Subarea Plan. Not only does the area have high quality habitat for gnatcatchers and overall biodiversity, as evidenced by the 39 breeding pairs and 42 individuals observed as well as over 140 native wildlife species documented during targeted gnatcatcher surveys in 2017 (DREIR Appendix D Biological Technical Report Appendix D), but it also covers the majority of the designated critical habitat patch, with smaller portions of designated critical habitat directly adjacent to the Project area to the east and southeast (USFWS 2007). This is important to consider, as the Project likely has impacts to gnatcatcher critical habitat outside the Project area as well; the DREIR fails to adequately assess such impacts. In addition, the Project would consist of new road extensions (Cuyamaca Street and Magnolia Avenue) outside of the Project area that would go through and further fragment designated critical habitat for gnatcatchers (DREIR Appendix D Biological Technical Report Figure 5-5B), where a breeding pair of gnatcatchers was observed during 2005 targeted surveys (DREIR Appendix D Biological Technical Report Appendix D Figure 3). But the DREIR is misleading; although the DREIR shows the road extensions going through designated critical habitat, Figure 5-5B in the Biological Technical Report makes it seem like there is no other designated critical habitat next to the proposed road extensions, when in fact the open space immediately adjacent to the east and southeast of the Project area is all designated gnatcatcher critical habitat. Suitable gnatcatcher habitat immediately adjacent to the Project area should be included in the impact analyses. The DREIR fails to adequately describe, assess, and mitigate impacts to coastal California gnatcatchers and their designated critical habitat.

O6-24

O6-25

The DREIR states that there would be permanent and temporary impacts to 987.58 acres of 2407.49 acres of gnatcatcher critical habitat in the Project area (DREIR at 4.3-47), again, not including potential suitable habitat/designated critical habitat. The DREIR goes on to erroneously downplay such impacts, stating that “only 399.19 acres would be considered suitable

**O6-23:** This comment states that the EIR fails to adequately evaluate likely project impacts to coastal California gnatcatcher (*Poliophtila californica californica*) Critical Habitat outside the project site. In response to this comment, Biological Resources Technical Report (Appendix D) Figure 2-1, USFWS-Designated and Proposed Critical Habitat within the Project Site, has been revised to show the location of the surrounding USFWS-designated Critical Habitat within a 1-mile buffer around the project site. Section 4.3.5, Project Impacts and Mitigation Measures, addresses both direct and indirect impacts to special-status wildlife species and to sensitive natural communities, which include impacts to coastal California gnatcatcher and its Critical Habitat. Therefore, the mitigation provided in the EIR for direct and indirect impacts to special-status wildlife species and sensitive natural communities would also reduce impacts to the surrounding Critical Habitat areas to less than significant. Please refer to Thematic Response – Coastal California Gnatcatcher.

**O6-24:** This comment states that the proposed project’s new road extensions outside of the project site would fragment designated Critical Habitat for coastal California gnatcatcher. The EIR acknowledges that there will be permanent habitat loss to the USFWS-designated Critical Habitat from the off-site road extensions. However, the impacts along the off-site road extensions

would be minimal (14.69 acres of permanent impacts to Critical Habitat modeled as suitable habitat for coastal California gnatcatcher) compared to the entire South San Diego County Unit, which comprises approximately 20,935 acres. With respect to potential habitat fragmentation, coastal California gnatcatcher would have no trouble accessing the Critical Habitat areas adjacent to the new road extensions. Therefore, significant impacts to off-site Critical Habitat areas are not anticipated. Additionally, based on the opinion of the biological experts who prepared the analysis, the EIR describes how the proposed mitigation strategy for direct and indirect impacts to special-status wildlife species and sensitive natural communities would also reduce impacts to the surrounding Critical Habitat areas to less than significant. Furthermore, habitat connectivity to off-site areas would be consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines. Please refer to Thematic Response – Coastal California Gnatcatcher for further details.

The comment correctly states that several use areas do not occur within the suitable modeled habitat, as shown on Figure 5-5b in the Biological Resources Technical Report (Appendix D). Figure 5-5b of the Biological Resources Technical Report (Appendix D) contained an error (i.e., a GIS query was left on, which filtered out

some of the suitable modeled habitat shown on Biological Resources Technical Report [Appendix D] Figure 3-4) that has been revised to correctly show the suitable habitat areas on the project site. The error revision on Figure 5-5b of the Biological Resources Technical Report (Appendix D) will be included in the Errata to the Final EIR and does not change any conclusions of the CEQA analysis.

- O6-25:** The comment states that the EIR downplays impacts to coastal California gnatcatcher and does not include impacts to potential suitable habitat or designated Critical Habitat. The City disagrees with this comment. The impacts to coastal California gnatcatcher described in the EIR reflect the opinion of the biological experts who prepared the impact analysis in Biological Resources Technical Report (Appendix D). Please refer to Thematic Response – Coastal California Gnatcatcher.

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habitat for this species” ((DEIR at 4.3-47). Such description fails to acknowledge that, although gnatcatchers tend to prefer coastal sage scrub, “gnatcatchers may also occur in other nearby plant communities, especially during the non-breeding season” (USFWS, 2010). In fact, according to the USFWS,

O6-25  
 cont.

Sage scrub often occurs in a patchy, or mosaic, distribution pattern throughout the range of the coastal California gnatcatcher. Coastal California gnatcatchers also use chaparral, grassland, and riparian plant communities where they occur adjacent to or intermixed with sage scrub. Although existing quantitative data may reveal relatively little about coastal California gnatcatcher use of these other habitats, these areas may be critical during certain times of year for dispersal or as foraging areas during inclement conditions (e.g., drought). Breeding territories also have been documented in non-sage scrub habitat (e.g., chaparral and grassland/ruderal habitat).” (USFWS, 1997).

O6-26

Despite this, modeled gnatcatcher habitat was “Based on Use Areas documented during 2016 focused surveys and the following vegetation communities: Diegan coastal sage scrub (including valley needlegrass grassland, baccharis-dominated, disturbed, non-native grassland, and fire recovered varieties)” (DREIR Appendix D Biological Technical Report Table 3-2 at 119), which neglects non-scrub habitat that gnatcatchers could potentially use as well as potential suitable habitat in areas where targeted surveys were not conducted. In addition, it is unclear how “use areas” were defined, given that several “use areas” do not appear to fall within the modeled suitable habitat and there are numerous occurrences, including breeding pairs, that do not fall within the DREIR’s modeled gnatcatcher suitable habitat (DREIR Appendix D Biological Technical Report Figure 3-4; DREIR Appendix D Biological Technical Report Appendix E Figure 2). Clearly the areas where gnatcatchers were observed to be using the areas should be included in the definition of “use areas” and should therefore be included in the analyses. In fact, even if gnatcatchers were not observed to use a specific area, any potential use areas where suitable, potentially suitable, or historically suitable habitat should also be included in the analyses. In addition, the DREIR seems to exclude suitable habitat where gnatcatchers were observed outside of the designated critical habitat (but within the Project area) on the western side of the Project area from their analyses (DREIR Appendix D Biological Technical Report Figure 5-5B). Thus, the DREIR grossly underestimates the amount of potential suitable gnatcatcher habitat within the Project area. Thus, the DREIR fails to adequately describe, assess, and mitigate impacts to coastal California gnatcatchers and their designated critical habitat.

O6-27

The DREIR concludes that 427.85 of 1471.40 acres of modeled suitable habitat would be impacted and purports that 25 out of 39 use areas were be preserved under MM BIO-1 in the Habitat Preserve (DREIR Appendix D Biological Technical Report Table 5-4a at 353), but again,

**O6-26:** This comment states that the modeled coastal California gnatcatcher habitat neglects non-scrub habitat that coastal California gnatcatcher could potentially use, as well as potential suitable habitat in areas where targeted surveys were not conducted. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the EIR analysis, the appropriate habitat has been considered. While it is accurate to say that the species may occur in other nearby plant communities, it is generally accepted that coastal California gnatcatchers are closely tied to coastal sage scrub communities to meet their life history needs, especially for reproduction (USFWS 2010). Please refer to Thematic Response – Coastal California Gnatcatcher for further details.

This comment states that it is unclear how Use Areas are defined and should be included in the impact analysis. Biological Resources Technical Report (Appendix D) Section 4.5.3.2 defines a coastal California gnatcatcher Use Area as a specific area of habitat that each coastal California gnatcatcher pair was observed using (i.e., nesting and/or foraging in). Both Use Areas and suitable habitat are included in the EIR impact analysis, which was prepared by biological experts. Please refer to Thematic Response – Coastal California Gnatcatcher for further details.



The comment also states that the EIR underestimates the amount of potential suitable habitat for coastal California gnatcatcher and fails to adequately describe, assess, and mitigate impacts to this species and USFWS-designated Critical Habitat. The City disagrees with this comment. The estimate of potential suitable habitat and the description, assessment and recommended mitigation for impacts to this species were based on modeled suitable habitat for coastal California gnatcatcher described in the Biological Resources Technical Report (Appendix D) Table 3-2, Suitable Habitat Models for Special-Status Wildlife Species Present or with Moderate Potential to Occur within the Project Area (Including Off-Site Areas), reflects both the scientific literature and opinion of the biological experts who prepared this information. The EIR impact analysis for coastal California gnatcatcher includes both Use Areas and suitable modeled habitat, which are based on field surveys conducted specifically for the proposed project and applies to the project site as a whole and to designated Critical Habitat. The mitigation provided in Mitigation Measure BIO-1, which would conserve 1,017.61 acres of existing suitable modeled habitat, 1,372.74 acres of coastal California gnatcatcher Critical Habitat, and 25 Use Areas, would provide other, non-coastal sage scrub habitat types for use by coastal California gnatcatcher. Please refer to Thematic Response – Coastal California Gnatcatcher for further details.

**O6-27:** This comment states that the modeled suitable habitat for coastal California gnatcatcher is flawed and does not include areas where coastal California gnatcatchers were observed and potential suitable habitat in its designated Critical Habitat. The comment correctly states that several Use Areas do not occur within the suitable modeled habitat, as shown on Figure 5-5b in the Biological Resources Technical Report (Appendix D). Figure 5-5b of the Biological Resources Technical Report (Appendix D) contained an error (i.e., a GIS query was left on, which filtered out some of the suitable modeled habitat shown on Biological Resources Technical Report [Appendix D] Figure 3-4) that has been revised to correctly show the suitable habitat areas within the project site. The error revision on Figure 5-5b of the Biological Resources Technical Report (Appendix D) does not change any conclusions of the CEQA analysis.

This comment states that the EIR fails to use the best available science to analyze the ecological impacts of removing and fragmenting designated Critical Habitat, fails to adequately assess and mitigate impacts of fragmentation and edge effects, and it is more likely that the project site would be permanently impacted by the project due to reduced connectivity, edge effects, and increased wildfire frequency. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the Biological Resources

Technical Report (Appendix D), the best available science was used. The EIR acknowledges that there will be permanent habitat loss and some fragmentation to the designated Critical Habitat on the project site. However, the EIR describes how the proposed mitigation strategy would maintain the functions of both the existing suitable habitat included in the Habitat Preserve through a combination of preservation of existing resources (including 1,107.61 acres of suitable habitat for coastal California gnatcatcher), restoration and enhancement of currently unsuitable habitat, and long-term monitoring and adaptive management of resources, as well as habitat connectivity consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines.

Fire frequency is expected to decrease with project implementation. See the Fire Protection Plan (Appendix P1) for details. Additionally, Section 4.6 of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) includes adaptive management strategies for revegetation of the Habitat Preserve after a fire. Based on the opinion of the biological experts, the indirect impacts to coastal California gnatcatcher and other special-status wildlife species, including human activities from traffic, lighting, noise, domestic pets, pollutants, invasive weeds and increased fire frequency are addressed in the EIR and

would be reduced to less than significant through Mitigation Measure BIO-1 (Preserve Management Plan), Mitigation Measure BIO-6 (Land Use Adjacency Guideline), Mitigation Measure BIO-7 (Stormwater Pollution Prevention Plan), Mitigation Measure BIO-9 (Habitat Preserve Protection), Mitigation Measure BIO-10 (Weed Control Treatment), Mitigation Measure BIO-20 (Wildlife Protection), Mitigation Measure BIO-21 (Fire Protection Plan, Appendix P1) and Mitigation Measure BIO-22 (Wildlife Corridor). With respect to domestic pets, Section 4.2.4, Predator/Pest Control, of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) includes management strategies conducted by the Preserve Manager for domestic animal control in the Habitat Preserve, thereby reducing impacts from free-roaming dogs and cats on the wildlife species, including coastal California gnatcatcher, in the Habitat Preserve.

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O6-27 cont. the modeled suitable habitat is flawed and does not include areas where gnatcatchers were actually observed using the area, let alone all the potential suitable habitat throughout its designated critical habitat. In addition, the DREIR seems to confuse permanent removal of gnatcatcher habitat (or any other sensitive habitat or species) with permanent impacts due to the proposed Project, as only areas where there would be construction and roads have been identified as areas permanently impacted by the Project (DREIR Appendix D Biological Technical Report Figure 5-5B). The DREIR fails to use the best available science to analyze the ecological impacts of removing and fragmenting thousands of acres of high quality, intact designated critical gnatcatcher habitat. It is more likely that the entire Project area and adjacent designated critical habitat would be permanently impacted by the Project due to reduced connectivity, edge effects from roads and development, and increased wildfire frequency due to increased human ignitions. The DREIR fails to adequately assess and mitigate impacts of fragmentation and edge effects to gnatcatchers and designated critical habitat.

O6-28 The DREIR fails to adequately assess and mitigate impacts to habitat connectivity important for the long-term survival of gnatcatchers (and many other animal and plant species). According to the USFWS, gnatcatcher home ranges vary seasonally, and breeding territories range from 2 to 14 acres (USFWS, 2010). However, juveniles have been found to disperse up to 22 kilometers (~14 miles), and "Dispersal of juveniles generally requires a corridor of native vegetation that provides certain foraging and sheltering requisites and that connects to larger patches of appropriate sage scrub vegetation (Soulé 1991, p. 92)" (USFWS, 2010). The Project would fragment a large, contiguous, high quality habitat patch within designated critical habitat into at least four smaller patches of habitat, which would then become at least partially degraded due to edge effects from the roads and development. In addition, the Fanita Commons and Orchard Village isolate three small patches of designated critical habitat, which could render those habitat islands unusable by gnatcatchers. The DREIR fails to adequately describe, assess, and mitigate impacts to gnatcatcher connectivity.

O6-29 As alluded to previously, the DREIR also fails to consider edge effects of human activities on wildlife, wildlife movement, and habitat connectivity. Negative edge effects from human activity, such as traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency, have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2003). The proposed development and roadways will increase traffic and further fragment the landscape, which could affect gnatcatchers as well as the diverse animals and plants in the area. A recent study found that bird species assemblage and abundance were negatively affected at a mean distance of 700 m from roads (Cooke, Balmford, Donald, Newson, & Johnston, 2020).

O6-30 Field observations and controlled laboratory experiments have shown that traffic noise can significantly degrade habitat value for migrating songbirds (Ware, McClure, Carlisle, & Barber,

**O6-28:** This comment states that the EIR fails to adequately assess and mitigate impacts to habitat connectivity for coastal California gnatcatcher. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the assessment and the recommended mitigation, the impacts to habitat connectivity for this species have been appropriately assessed and the recommended mitigation reduces impacts to less than significant, As described in the Thematic Response – Wildlife Movement and Habitat Connectivity, studies conducted by Soulé and colleagues in the 1990s suggest that an intact 900-acre habitat block would be large enough to sustain commonly occurring species in the coastal San Diego region, even if habitat connectivity to off-site habitat areas were severely constrained. Please refer to Thematic Response – Coastal California Gnatcatcher.

**O6-29:** This comment states that the EIR fails to consider edge effects of human activities on wildlife, wildlife movement, and habitat connectivity. This comment states that the EIR fails to consider edge effects of human activities on wildlife, wildlife movement, and habitat connectivity. The comment also includes a statement that negative edge effects can occur from anthropogenic features up to 300 meters away according to Conservation Thresholds for Land Use Planners (Environmental Law Institute 2003). The City disagrees

with this comment. Indirect impacts to coastal California gnatcatcher and other special-status wildlife species, including human activities from traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency are addressed in the EIR and would be reduced to less than significant through Mitigation Measure BIO-1 (Preserve Management Plan), Mitigation Measure BIO-6 (Land Use Adjacency Guideline), Mitigation Measure BIO-7 (Stormwater Pollution Prevention Plan), Mitigation Measure BIO-9 (Habitat Preserve Protection), Mitigation Measure BIO-10 (Weed Control Treatment), Mitigation Measure BIO-20 (Wildlife Protection), Mitigation Measure BIO-21 (Fire Protection Plan, Appendix P1), and Mitigation Measure BIO-22 (Wildlife Corridor). The Conservation Thresholds for Land Use Planners (Environmental Law Institute 2003) recommends a 300-meter buffer, and the project design provides the functional equivalent through wide fuel modification zones (i.e., 115 feet to 165 feet in some areas) around the two villages, outside the Habitat Preserve, which would buffer development from the Habitat Preserve while maintaining native vegetation. In addition to the physical buffer of the fuel modification zones, the in-perpetuity management would control for edge effects within the Habitat Preserve. Based on the opinion of the biological experts who prepared the analysis, edge effects have been appropriately considered in the impact analysis, in the

identification of recommended mitigation, and in the conclusion that the impacts would be less than significant after mitigation.

Please also refer to Thematic Response – Coastal California Gnatcatcher and response to comment O6-27.

- O6-30:** This comment states that impacts of noise could affect much of the proposed project’s Habitat Preserve based on a recent study that found bird species were negatively affected at a mean distance of 700 meters from roads. As discussed in Dooling and Popper (2007), noise impacts on birds is highly species specific, so it is difficult, or even inappropriate, to broadly generalize impacts to a particular bird species from studies on other species. In their paper, they cite Awbry et al. (1995) regarding a pertinent species, the California gnatcatcher, stating, “there are several studies (e.g., Awbry et al. 1995) showing that birds (as well as other animals) adapt quite well, and even appear sometimes to prefer, environments that include high levels of traffic noise.” It should also be noted that, according to CEQA requirements, an evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Based on the opinion of the biological experts who prepared the analysis, impacts of noise to the relevant bird species are appropriately assessed in the EIR.

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O6-30  
 cont.

2015). Subjects exposed to 55 and 61 dBA (simulated traffic noise) exhibited decreased feeding behavior and duration, as well as increased vigilance behavior (Ware et al. 2015). Such behavioral shifts increase the risk of starvation, thus decreasing survival rates. Another study also highlighted the detrimental impacts of siting development near areas protected for wildlife. The study noted that “Anthropogenic noise 3 and 10 dB above natural sound levels . . . has documented effects on wildlife species richness, abundance, reproductive success, behavior, and physiology” (Buxton et al., 2017). Thus, impacts of noise could affect much of the Project’s Habitat Preserve as well as adjacent open space and protected lands, like those in Goodan Ranch/Sycamore Canyon Preserve. In addition, studies have shown that the impacts of free-roaming dogs and cats on wildlife are often underestimated, and in fact, they can pose significant impacts to gnatcatchers and other wildlife, such as by preying on them, degrading habitat, and spreading disease (Loss, Will, & Marra, 2013; Young, Olson, Reading, Amgalanbaatar, & Berger, 2011). Loss et al. (2013) estimated that domestic cats in the US kill 1.3 to 4.0 billion birds annually. Thus, the DREIR fails to adequately assess and mitigate impacts of edge effects due to the proposed Project on gnatcatchers and suitable, potentially suitable, or historically suitable habitat (within designated critical habitat or otherwise).

O6-31

The DREIR fails to assess and mitigate impacts of increased fire frequency due to the proposed Project to gnatcatchers and designated gnatcatcher habitat. Sprawl developments with low/intermediate densities extending into chaparral and sage scrub habitats that are prone to fire, like the proposed Project, have led to more frequent wildfires caused by human ignitions, and these types of developments have the highest chances of burning (Balch et al., 2017; Bistinas et al., 2013; Keeley & Fotheringham, 2003; Keeley, Fotheringham, & Morais, 1999; Keeley & Syphard, 2018; Radeloff et al., 2018; Syphard, Keeley, Massada, Brennan, & Radeloff, 2012; Syphard, Massada, Butsic, & Keeley, 2013; Syphard et al., 2007, 2019).<sup>1</sup> This could disrupt the natural fire regime and lead to a dangerous feedback loop of deadly fires and habitat destruction.

O6-32

Habitat type conversion and increased wildfire frequency due to increased human ignitions have been identified as threats to gnatcatcher habitat (USFWS, 2010), yet the DREIR fails to analyze and mitigate impacts to gnatcatcher and its designated critical habitat due to the Project increasing wildfire risk. The Project area is located in a very high fire hazard zone that burned in the 2003 Cedar Fire. It is dominated by chaparral and sage scrub, native California habitats that are adapted to infrequent (every 30 to 150 years), large, high-intensity crown fire

<sup>1</sup> On November 13, 2018, the Center sent a letter to the San Diego County Board of Supervisors discussing the wildfire impacts of poorly planned development in San Diego County (the “November 13 Letter”). A copy of the November 13 Letter is attached hereto as Exhibit 2 and is incorporated by reference. The issues raised in the November 13 Letter apply directly and with equal force to this Project.

**O6-31:** This comment states that the EIR fails to adequately assess and mitigate impacts of edge effects, including free-roaming dogs and cats. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, edge effects, including from domestic dogs and cats, have been appropriately considered in the impact analysis, in the identification of recommended mitigation, and in the conclusion that the impacts are less than significant after mitigation. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity and response to comment O6-27.

**O6-32:** This comment states that the EIR fails to assess and mitigate impacts of increased fire frequency due to the proposed project to coastal California gnatcatcher and designated habitat. Fire frequency is expected to decrease with project implementation. See the Fire Protection Plan (Appendix P1) for details. Additionally, Section 4.6 of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) anticipates the possibility of a wildfire affecting the Habitat Preserve and includes adaptive management strategies for revegetation of the Habitat Preserve after a fire, which were prepared by the biological experts and reflect their opinion. Please refer to Thematic Response – Coastal California Gnatcatcher.



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O6-32 cont. regimes (Keeley & Fotheringham, 2001). However, if these regimes are disrupted, the habitats become degraded (Keeley, 2005, 2006; Syphard, Brennan, & Keeley, 2018). When fires occur too frequently, type conversion occurs and the native shrublands are replaced by non-native grasses and forbs that burn more frequently and more easily, ultimately eliminating native habitats and biodiversity while increasing fire threat over time (Keeley, 2005, 2006; Safford & Van de Water, 2014; Syphard et al., 2018; Syphard, Radeloff, Hawbaker, & Stewart, 2009). This could have serious consequences for coastal California gnatcatchers in and adjacent to the Project area, yet there is no mention of this in the DREIR. Thus, the DREIR fails to adequately disclose, assess, and mitigate potential wildfire impacts of the Project on gnatcatchers and designated critical habitat.

O6-33 It is difficult to determine the adequacy of the DREIR's mitigation measures given that the calculations for suitable habitat are flawed. However, the DREIR relies mainly on MM BIO-1 and 2 to mitigate impacts to gnatcatchers and gnatcatcher habitat, which do nothing to address the impacts of habitat fragmentation, edge effects, or increased wildfire risk. The DREIR fails to adequately describe, assess, and mitigate impacts to coastal California gnatcatchers and their designated critical habitat. The DREIR should be revised and recirculate to address these insufficiencies.

**C. The FEIR fails to adequately assess and mitigate impacts to the Southern California and Central Coast mountain lions (*Puma concolor*), a candidate species under the California Endangered Species Act.**

O6-34 The DEIR fails to adequately describe, assess, and mitigate impacts to the Central Coastal and Southern California Evolutionarily Significant Unit (ESU) of mountain lions (*Puma concolor*), a candidate species under the California Endangered Species Act (CESA). Mountain lions are not mentioned as a special-status species in the DREIR (DREIR Appendix D Biological Technical Report Appendix N). In fact, the DREIR incorrectly lists mountain lions as an "MSCP Covered Species occurring on the project site but with no other status" (DREIR at 4.3-130) even though it was classified as a "specially protected mammal" in 1990 after voters passed Prop 117 and mountain lions in the Central Coast/Southern California ESU were granted candidacy status under CESA by the California Fish and Game Commission (CFGC) on April 16, 2020 (CFGC, 2020), prior to the release of this DREIR. Accordingly, the species' status as a candidate requires that it be included among the species analyzed in the EIR (DREIR at 4.3-28; Fish & Game Code § 2050 et seq.). The DREIR should be revised and recirculated to adequately describe, assess, and mitigate impacts to these imperiled mountain lions.

O6-35 There is ample scientific evidence that indicates mountain lion populations in the Project area are struggling to survive and that human activities and land use planning that does not

**O6-33:** The comment states that the EIR's mitigation does not address impacts of habitat fragmentation, edge effects, or increased wildfire risk and the mitigation measures do not adequately mitigate impacts. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the recommended suite of mitigation measures would reduce impacts from habitat fragmentation, edge effects, and wildfire risk to a less than significant level. Section 4.3.5, Project Impacts and Mitigation Measures, addresses both direct and indirect impacts to special-status wildlife species and to sensitive natural communities. The EIR describes how the proposed mitigation strategy would maintain the functions of both the existing suitable habitat included in the Habitat Preserve through a combination of preservation of existing resources (including 1,107.61 acres of suitable habitat for coastal California gnatcatcher), restoration and enhancement of currently unsuitable habitat, and long-term monitoring and adaptive management of resources, as well as habitat connectivity consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines. Therefore, the mitigation provided in the EIR for direct and indirect impacts to coastal California gnatcatcher would reduce impacts to less than significant. Please refer response to

comment O6-27 and to Thematic Response – Coastal California Gnatcatcher for further details.

- O6-34:** This comment states the EIR incorrectly lists the mountain lion as occurring on the project site but with no other status besides an MSCP species and that the EIR fails to adequately describe, assess, and mitigate impacts to mountain lions, which are a special-status species under the California Endangered Species Act. Mountain lion was petitioned for listing on July 16, 2019, which only initiates a CDFW review process to determine if there is enough evidence to warrant elevation to the next step of review. It was designated as a Candidate on April 21, 2020, meaning that it satisfied criteria for additional review, thus providing it with the same interim protections as a listed species until a decision is made. These dates were after the issuance of the Notice of Preparation for the proposed project’s EIR, which was issued on November 10, 2018. Pursuant to CEQA Guidelines, Section 15125, the EIR did not describe the mountain lion as a Candidate species.

Mountain lion is a “specially protected mammal” under California Fish and Game Code, and if a project planned in an area where a specially protected mammal occurs, an applicant must design the project to avoid take. Although mountain lion was recorded on the project site based on sign (i.e., scat and no individuals were observed during the wildlife corridor camera study),

based on the opinion of the biological experts who prepared the analysis, take directly attributable to the proposed project is not anticipated with project implementation. Please refer to Thematic Responses – Wildlife Movement and Habitat Connectivity and Mountain Lion for further details.

- O6-35:** This comment states that land use planning that does not integrate adequate habitat connectivity can have adverse impacts on mountain lions and the EIR fails to adequately describe, assess, and mitigate impacts to mountain lion. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the Biological Resources Technical Report (Appendix D), the EIR appropriately describes and assesses the impacts to mountain lion, recommends appropriate mitigation, and concludes that the impacts are less than significant after mitigation. Although mountain lion was recorded on the project site based on sign (i.e., scat and no individuals were observed during the wildlife corridor camera study), take directly attributable to the proposed project is not anticipated with project implementation. The Habitat Preserve design would facilitate continued movement by wildlife through the project site, including occasionally mountain lions, and maintain connectivity to surrounding preserves. While mountain lions may occasionally hunt on the project site, the site is not

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integrate adequate habitat connectivity can have adverse impacts on mountain lions. Continued habitat loss and fragmentation has led to 10 genetically isolated populations within California. There are six identified mountain lion populations in the ESU, and several are facing an extinction vortex due to high levels of inbreeding, low genetic diversity, and high human-caused mortality rates from car strikes on roads, depredation kills, rodenticide poisoning, poaching, disease, and increased human-caused wildfires (Benson et al., 2016, 2019; Ernest et al., 2003; Ernest, Vickers, Morrison, Buchalski, & Boyce, 2014; Gustafson et al., 2018; Riley et al., 2014; Vickers et al., 2015).

The effective population sizes of the six populations within the ESU range from 4 to 56.6 (Benson et al., 2019; Gustafson et al., 2018). An effective population size ( $N_e$ ) of 50 is assumed to be sufficient to prevent inbreeding depression over five generations, while an effective population size of 500 is considered sufficient to retain evolutionary potential in perpetuity (Frankham, Bradshaw, & Brook, 2014; Traill, Brook, Frankham, & Bradshaw, 2010). Five of the six populations are well below that minimum threshold of 50 and none have an effective population size anywhere near 500, which indicates that these populations are at serious risk of becoming extirpated. The population most relevant to the Project is the Eastern Peninsular Range (EPR). The EPR population has an effective population size of 31.6, the highest in the region (compared to the neighboring Santa Ana Mountains  $N_e = 6$ , San Gabriel/San Bernardino Mountains  $N_e = 5$ , Santa Monica Mountains  $N_e = 4$ ; Gustafson et al., 2018); however, its effective population size is still well below the minimum threshold of 50. Low genetic diversity and high human-caused mortalities are driving this population towards an extinction vortex similar to what the mountain lions in the Santa Monica and Santa Ana mountains are experiencing (Gustafson et al., 2018). Scientists predict that the Santa Monica and Santa Ana populations are likely to become extinct within 50 years if gene flow with other mountain lion populations is not improved (Benson et al., 2016, 2019; Gustafson et al., 2018). This is detailed in the Center's petition to the California Fish and Game Commission to protect Southern California and Central Coast mountain lions under the California Endangered Species Act (Yap, Rose, & Cummings, 2019). Continued land use that further fragments mountain lion habitat in the Southern California region without adequately minimizing impacts to functional connectivity could contribute to the extinction of pumas in the area. The DREIR fails to adequately describe, assess, and mitigate impacts to these mountain lions.

The DREIR fails to adequately describe and assess existing conditions for mountain lions and wildlife connectivity in the Project area. The primary threat to the long-term survival of mountain lions in the Southern California/Central Coast ESU is genetic isolation due to lack of connectivity caused by continuous development in mountain lion habitat with little regard of their movement needs. Thus, the persistence of the six populations with the ESU relies heavily on being connected with mountain lions within subpopulations as well as throughout the ESU.

considered to support major or critical populations of this species, nor does it support suitable denning habitat. Please refer to Thematic Response – Mountain Lion.

O6-35  
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O6-35  
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The proposed Project would fragment over 2,600 acres of contiguous, high quality habitat adjacent to thousands of acres of protected open space of the Goodan Ranch/Sycamore Canyon Preserve and the San Vicente Reservoir Cornerstone Lands to the north and northeast, respectively, as well as thousands of acres of open space to the west (managed by the military). The layout essentially bisects the Project area in two, with approximately 900 acres of the Habitat Preserve in the southern portion functionally cut off from surrounding open space by gateways, roads, and development (DREIR Figure 3-3). Given the remaining layout of the Vineyard Village, Fanita Commons, and Orchard Village extending into mountain lion habitat, further habitat fragmentation, habitat degradation, and edge effects would likely deter mountain lions from moving through the Project area.

O6-36

One study found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans (Smith et al., 2017).<sup>2</sup> The study concluded that even “non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey” (Smith et al., 2017). In addition, mountain lions have been found to respond fearfully upon hearing human vocalizations, avoiding the area and moving more cautiously when hearing humans (Smith et al., 2017; Suraci, Clinchy, Zanette, & Wilmers, 2019). Other studies have demonstrated that mountain lion behavior is impacted when exposed to other evidence of human presence, such as lighting or vehicles/traffic (Smith, Wang, & Wilmers, 2015; Wang, Smith, & Wilmers, 2017; Wilmers et al., 2013). In addition, preliminary results from study by researchers at UC Davis and University of Southern California, as well as those by other researchers, suggest that the light, noise, and other aspects of highways can have negative impacts on wildlife numbers and diversity near the highways (Shilling, 2020; Vickers, 2020). The researchers found a significant difference between species richness and species type (mammals, including mountain lions), with lower richness and fewer species at crossing structures compared to background areas 1 kilometer away from the roads (Shilling, 2020). They also found that as traffic noises surpassed 60 dBC, the number of visits by small to large mammals decreased and most of the species in their study avoid traffic noise (Shilling, 2020). It is clear that different species have variable sensitivities to noise and light associated with development and transportation infrastructure; this can lead to changes in species distributions near roads and development, which can have ecosystem-level impacts (e.g., Suraci et al. 2019). The DREIR fails to adequately assess and mitigate impacts to mountain lions.

<sup>2</sup> See also Sean Greene, “How a fear of humans affects the lives of California’s mountain lions,” *Los Angeles Times* (June 27, 2017), available at <http://beta.latimes.com/science/sciencenow/la-sci-sn-pumas-human-noise-20170627-story.html>.

**O6-36:** This comment states that the EIR fails to assess and mitigate impacts to mountain lions in terms of human disturbances. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR appropriately assesses impacts to mountain lion, recommends appropriate mitigation, and concludes that the impacts are less than significant after mitigation. The project site is not considered to support major or critical populations of this species and is likely to only support around 3 percent of a female’s much smaller range. Habitat for this species would be protected within the Habitat Preserve and the Preserve Design will bolster and buffer adjacent open space areas. Please refer to Thematic Responses – Wildlife Movement and Habitat Connectivity and Mountain Lion.

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O6-37

Mountain lions are a key indicator species of wildlife connectivity and healthy ecosystems. As the last remaining wide-ranging top predator in the region, the ability to move through large swaths of interconnected habitat is vital for genetic connectivity and their long-term survival. In addition, impacts to mountain lions in the region could have severe ecological consequences; loss of the ecosystem engineer could have ripple effects on other plant and animal species, potentially leading to a decrease in biodiversity and diminished overall ecosystem function. Many scavengers, including raptors, foxes, and numerous insects, would lose a reliable food source (Barry et al., 2019; Ruth & Elbroch, 2014). Fish, birds, amphibians, reptiles, rare native plants, and butterflies would potentially diminish if this apex predator were lost (Ripple & Beschta, 2006, 2008; Ripple et al., 2014). Any development project that does not adequately address wildlife connectivity issues and integrate effective wildlife crossings and corridors based on the best available science could lead to the extirpation of mountain lion populations in the ESU and severe loss of biodiversity and ecosystem function in the region. See further discussion in Section IV of this comment letter regarding the DREIR's failure to adequately describe, assess, and mitigate impacts to wildlife movement and connectivity to less than significant. The DREIR should be revised and recirculate to address these insufficiencies.

**D. The DREIR fails to adequately assess and mitigate impacts to wildlife movement and habitat connectivity.**

O6-38

The DREIR fails to adequately describe the Project area's importance in wildlife connectivity. The region's high quality heterogeneous habitats that include but are not limited to wetlands, streams, grasslands, scrublands, woodlands, and chaparral are important for wildlife connectivity and migration at the local, regional, and continental scale. Local connectivity that links aquatic and terrestrial habitats allows various sensitive species to persist, including special-status species like western spadefoot toad and San Diego fairy shrimp. At a regional scale, medium- and large-sized mammals, such as mountain lions, bobcats (*Lynx rufus*), coyotes (*Canis latrans*), and mule deer (*Odocoileus hemionus*), as well as insects, like Quino checkerspot butterflies (*Euphydryas editha quino*) and Hermes copper butterflies (*Lycæna Hermes*), require large patches of heterogeneous habitat to forage, seek shelter/refuge, and find mates. These species are all known to occur in the Project area. And at a global scale, migrating monarch butterflies (*Danaus plexippus*) have been observed in the Project area, and the Project area provides refuge and habitat for numerous resident and migratory birds within the Pacific Flyway, a north-south migratory corridor that extends from Alaska to Patagonia, as evidenced by observed least Bell's vireo (*Vireo bellii pusillus*) and rufous hummingbirds (*Selasphorus rufus*) in the Project area. The region is important for local, regional, and global biodiversity; wildlife movement and habitat connectivity must be maintained at multiple scales to preserve the area's rich biodiversity.

**O6-37:** This comment states that the EIR fails to adequately describe, assess, and mitigate impacts to wildlife movement and connectivity to less than significant. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR appropriately describes and assesses impacts to mountain lion, recommends appropriate mitigation, and concludes that the impacts are less than significant after mitigation. The EIR discusses wildlife corridors and habitat connectivity in Section 4.3.1.5, Wildlife Corridors and Habitat Linkages. The EIR describes how the proposed project would maintain the functions of both regional and local wildlife movement and habitat connectivity consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines and thus reduce impacts to a less than significant level. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity for further details.

**O6-38:** This comment states that the EIR fails to adequately describe the project area's importance in wildlife connectivity. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the description, the EIR appropriately describes the importance of the project site and vicinity to wildlife connectivity. The EIR discusses wildlife corridors and habitat connectivity in Section 4.3.1.5, Wildlife Corridors and Habitat Linkages. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

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The DREIR fails to adequately assess impacts to wildlife movement and habitat connectivity within and adjacent to the proposed Project. Although the DREIR sets aside about 1650 acres of the Project area as Habitat Preserve (DREIR Table 3-1 at 3-8), the layout of the Project fragments over 2,600 acres of contiguous, intact, high quality habitat through habitat removal, degradation, and isolation (DREIR Figure 4.3-10). These wildlands are adjacent to over thousands of acres of protected open space of the Goodan Ranch/Sycamore Canyon Preserve and the San Vicente Reservoir Cornerstone Lands to the north and northeast, respectively, as well as thousands of acres of open space to the west (managed by the military). Implementing the proposed Project would have severe impacts to wildlife movement and habitat connectivity within and adjacent to the Project area; the proposed wildlife corridors and Habitat Preserve do not mitigate impacts to wildlife movement and habitat connectivity to less than significant.

Roads and development create barriers that lead to habitat loss and fragmentation, which harms native wildlife, plants, and people. As barriers to wildlife movement, poorly-planned development and roads can affect an animal's behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, landscapes, and ecosystem function (Ceia-Hasse, Navarro, Borda-de-Água, & Pereira, 2018; Cooke et al., 2020; Dornas, Teixeira, Gonsioroski, & Nóbrega, 2019; Haddad et al., 2015; Marsh & Jaeger, 2015; Mitsch & Wilson, 1996; Shilling, 2020; Suraci et al., 2019; Trombulak & Frissell, 2000; van der Ree, Jaeger, van der Grift, & Clevenger, 2011). For example, habitat fragmentation from transportation infrastructure and development has been shown to cause mortalities and harmful genetic isolation in mountain lions in Southern California (Ernest et al., 2014; Riley et al., 2014; Vickers et al., 2015), increase local extinction risk in amphibians and reptiles (Brehme, Hathaway, & Fisher, 2018; Cushman, 2006; Dornas et al., 2019), cause high levels of avoidance behavior and mortality in birds and insects (Benítez-López, Alkemade, & Verweij, 2010; Cooke et al., 2020; Kantola, Tracy, Baum, Quinn, & Coulson, 2019; Loss, Will, & Marra, 2014), and alter pollinator behavior and degrade habitats (Aguilar, Quesada, Ashworth, Herrerias-Diego, & Lobo, 2008; Goverde, Schweizer, Baur, & Erhardt, 2002; Trombulak & Frissell, 2000). Habitat fragmentation also severely impacts plant communities. An 18-year study found that reconnected landscapes had nearly 14% more plant species compared to fragmented habitats, and that number is likely to continue to rise as time passes (Damschen et al., 2019). The authors conclude that efforts to preserve and enhance connectivity will pay off over the long-term (Damschen et al., 2019). In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to allow for range shifts and species migrations as climate changes (Cushman et al., 2013; Heller & Zavaleta, 2009; Krosby, Theobald, Norheim, & Mcrae, 2018). Loss of wildlife connectivity decreases biodiversity and degrades ecosystems.

O6-39

**O6-39:** This comment states that the EIR fails to adequately assess impacts to wildlife movement and habitat connectivity within and adjacent to the proposed project, and the proposed wildlife corridors and Habitat Preserve do not mitigate impacts to wildlife movement and habitat connectivity to less than significant. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR appropriately assesses impacts to wildlife movement and habitat connectivity within and adjacent to the project site, recommends appropriate mitigation, including the Habitat Preserve in Mitigation Measure BIO-1 (Preserve Management Plan), and concludes that the impacts to wildlife movement and habitat connectivity are less than significant after mitigation. The EIR notes that the project site serves as live-in habitat for a variety of large and small wildlife, including at least partial territories for several mid-sized large mammals, including mountain lion, bobcat, mule deer, and coyote, with local movement occurring throughout the project site. The EIR also states that the project site contributes to regional wildlife movement between County open space, MCAS Miramar, and Santee Lakes Recreation Preserve as shown on the City's Draft MSCP Subarea Plan Preserve System Map (see Figure 4.3-3, Regional Planning Context – Draft Santee MSCP Subarea Plan). The EIR describes how the proposed project would

maintain the functions of both regional and local wildlife movement and habitat connectivity consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines and thus reduce impacts to a less than significant level. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.



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O6-40

The DREIR fails to adequately assess and mitigate impacts to functional connectivity and ignores the best available science. MM BIO-22 Wildlife Corridor is insufficient to mitigate impacts to wildlife movement and habitat connectivity to less than significant. Effective, functional corridors are continuous (not fragmented by roads or other anthropogenic features), wide enough to overcome edge effects, dominated by native vegetation, and have equal or higher habitat quality than core habitat patches (Brooker et al 1991, Hilty et al 2006, Tilman et al 1997, Bennett 1991, 1994, Forman 1995). The Project’s design and layout will subject the surrounding open space (within the Project’s Habitat Preserve as well as open space adjacent to the Project area) to development edge effects and will likely impact key, wide-ranging predators, such as mountain lions and bobcats (Cooke et al., 2020; Crooks, 2002; Delaney, Riley, & Fisher, 2010; Lee et al., 2012; Riley et al., 2006; Smith et al., 2017, 2015; Vickers et al., 2015; Wang et al., 2017), as well as smaller species with poor dispersal abilities, such as song birds, small mammals, and herpetofauna (Benítez-López et al., 2010; Cushman, 2006; Kociolek, Clevenger, St. Clair, & Proppe, 2011; Slabbekoorn & Ripmeester, 2008). As mentioned previously, negative edge effects from human activity, traffic, lighting, noise, domestic pets, pollutants, invasive weeds, and increased fire frequency have been found to be biologically significant up to 300 meters (~1000 feet) away from anthropogenic features in terrestrial systems (Environmental Law Institute, 2003). And a more recent study indicates impacts could extend much farther; Cooke et al. (2020) found that bird species assemblage and abundance were negatively affected at a mean distance of 700 m (~2300 feet or ~0.43 miles) from roads (Cooke et al., 2020). Thus the designed wildlife corridors (which are not based on any movement studies of any species in the area) ranging from 389 to 1960 feet are insufficient to adequately mitigate impacts to wildlife movement and habitat connectivity due to habitat removal and fragmentation and associated edge effects of the proposed Project.

O6-41

The DREIR points to a single wildlife undercrossing on the east side of the Project area to “adequately convey[] coyotes, mule deer, and smaller-sized wildlife” on Cuyamaca Street approximately 400 feet south of the Project limits” and a single 48-inch culvert on the west side of the Project area for western spadefoot to mitigate impacts to connectivity in the southern portion of the Project area (DREIR Appendix D Biological Technical Report at 51 and Figure 5-7A). Although the text of the DREIR states that “Small 48-inch diameter reinforced concrete pipe culverts, and curbs directing small wildlife species into the culverts” (DREIR Appendix D Biological Technical Report at 51), which implies multiple crossings, Figure 5-7A of the Biological Technical Report only shows a single location for a “Western spadefoot Crossing” and MM BIO-23 indicates a single crossing for large wildlife on Cuyamaca Street and a single crossing for spadefoots on Fanita Parkway (DREIR 4.3-123). These crossings are insufficient to mitigate impacts to connectivity due to the proposed Project essentially isolating ~900 acres of habitat within the southern portion of the Project area plus additional open space between the Cuyamaca Street extension and the eastern boundary of the Project area (DREIR Appendix D

**O6-40:** This comment states that the EIR fails to adequately assess and mitigate impacts to functional connectivity and ignores the best available science. This comment states that Mitigation Measure BIO-22 (Wildlife Corridor) is insufficient to mitigate impacts to wildlife movement and habitat connectivity to less than significant. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the assessment, the recommended mitigation is appropriate, is based on the best available science, and will reduce impacts to less than significant. Through implementation of Mitigation Measure BIO-22 (Wildlife Corridor) and as shown on Figure 4.3-9, Local Wildlife Corridors, wildlife movement and habitat connectivity will be preserved along the northwestern and northern boundary of the project site, with Habitat Preserve widths between permanent development and the project site boundary ranging from 619 feet to more than 1,400 feet, providing a buffer between development and off-site open space north of the project site protected and managed as part of County of San Diego Park Preserve lands. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity for further details.

**O6-41:** This comment states that the two wildlife crossings are insufficient to mitigate impacts to connectivity and would essentially isolate the approximately 900 acres in the southern portion of the Habitat Preserve and would

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Biological Technical Report at 51 and Figure 5-7A). The DREIR fails to adequately assess and mitigate impacts to wildlife movement and connectivity to less than significant and ignores the best available science.

O6-42

One large undercrossing on the eastern side and one small undercrossing on the western side of the Project area are grossly insufficient to meet the needs of the diverse species that utilize or potentially utilize the heterogeneous habitats of the Project area. The Project proponent needs to accommodate for a range of small to large animals on both sides of the Project area to effectively facilitate wildlife movement. And it is important to consider that different species have different behaviors and needs that affect how they move. For example, smaller species with poor dispersal abilities, like western spadefoots and Blaineville's horned lizards (*Phrynosoma coronatum*), would require more frequent intervals of crossings compared to larger wide-ranging species, like mountain lions or coyotes, to increase their chances of finding a crossing. Gunson et al. (2016) recommend that crossing structures generally be spaced about 300 meters (~0.19 miles) apart for small animals when transportation infrastructure bisects large expanses of continuous habitat, though they recognize that some amphibians may need more frequent crossings no more than 50 meters (~0.03 miles) apart. And for many amphibian and reptile species, including western spadefoots, undercrossings should have grated tops so that the light and moisture inside the crossings are similar to that of the ambient environment. More in-depth analyses that include on-the-ground movement studies of which species are moving in the area and their home range area, habitat use, and patterns of movement are needed to determine how to best implement such crossings. In addition, the Project proponent needs to construct associated crossing infrastructure (e.g., exclusionary fencing appropriate for target species, berms to buffer crossings from sound and light) to improve chances of wildlife using the crossings, and such crossings and crossing infrastructure should be designed and built in consultation with local and regional experts, including agency biologists. And to improve the effectiveness of any wildlife crossings, there should be protected habitat on both sides of the crossing; therefore, the DREIR should include acquiring unprotected lands on both sides of the roads where a wildlife crossing would be implemented, again, in consultation with local conservation organizations and stakeholders, and preserving and managing those lands in perpetuity to ensure that the wildlife crossings and associated infrastructure remain functional over time. Given that impacts of noise, light, and vibration can affect the use of wildlife crossings, even if crossings are designed with adequate parameters and fencing, the crossings should be built with wildlife responsive design; crossings should have sound and light berms to minimize light and sound at the entrance/exit as well as on/in/under the crossings structures, and they should be well-maintained on both sides of the crossing for animals to use them (Shilling, 2020; Vickers, 2020). The DREIR's proposed wildlife crossings are insufficient. The DREIR fails to use the best available science and adequately assess and mitigate impacts to wildlife movement and habitat connectivity to less than significant.

O6-43

fail to meet the needs of the diverse species that use or potentially use the area. Based on the opinion of the biological experts who recommended this mitigation as sufficient to reduce impacts to less than significant, the City disagrees that the mitigation is insufficient to mitigate impacts to habitat connectivity and wildlife movement. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity for further details.

**O6-42:** This comment states that one large undercrossing on the eastern side and one small undercrossing on the western side of the project site are grossly insufficient to meet the needs of the diverse species that use the project site. Based on the opinion of the biological experts who recommended the undercrossings, the City disagrees with this conclusion. Based on the crossing spacing guidelines in the Gunson et al. (2016) study as cited in the comment, only one crossing would be recommended. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

**O6-43:** This comment states that the project proponent needs to construct associated crossing infrastructure to improve the chances of wildlife using the crossings. Based on the opinion of the biological experts that recommended the wildlife crossings, the recommended undercrossings as proposed will adequately facilitate wildlife use. As stated in Mitigation Measure BIO-23 (Wildlife

Undercrossings) wildlife undercrossings shall be designed to provide a greater than 0.6 openness ratio, raised floor, and directional curbs, which are intended to allow western spadefoot and other wildlife to cross. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

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O6-44

The DREIR's lack of sufficient wildlife crossings dismisses the need for corridor redundancy (*i.e.* the availability of alternative pathways for movement). Corridor redundancy is important in regional connectivity plans because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2008; Pinto & Keitt, 2008).

Corridor redundancy is critical when considering the impacts of climate change on wildlife movement and habitat connectivity. Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren, Price, Fischlin, de la Nava Santos, & Midgley, 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens, 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifi et al., 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al., 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Cahill et al., 2012; Chen, Hill, Ohlemüller, Roy, & Thomas, 2011; Maclean & Wilson, 2011; Parmesan, 2006; Parmesan & Yohe, 2003; Root et al., 2003; Warren et al., 2011). Thus, the DREIR fails to use the best available science and adequately assess and mitigate impacts to wildlife movement to less than significant.

O6-45

The DREIR also points to MM BIO-6 to minimize impacts to wildlife connectivity, yet MM BIO-6 states, "There are no requirements for buffers outside the Habitat Preserve, except as may be required for wetlands pursuant to federal and/or state permits or by California Environmental Quality Act mitigation conditions." (DREIR at 4.3-85). This is unacceptable. Even buffers within the Habitat Preserve are insufficient, with only 100-foot buffers from vernal pools required (DREIR Appendix D Biological Technical Report Appendix T at 62). Aquatic resources, including riparian corridors (streams and associated upland habitat), wetlands (including vernal pools), ponds, etc. provide valuable habitat and connectivity for numerous

**O6-44:** This comment states that the EIR's lack of sufficient wildlife crossings dismisses the need for corridor redundancy. The City disagrees with this comment. Based on the opinion of the biological experts that recommended the wildlife crossings, the recommended undercrossings as proposed will adequately facilitate wildlife movement and provide sufficient connectivity. According to the Gunson et al. (2016) study cited in the comment, crossing structures should generally be spaced about every 300 meters (984 feet) where roadways bisect large expanses of continuous habitat. Under this recommendation, only one crossing would be recommended, whereas the project would construct two. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

**O6-45:** The comment reiterates Mitigation Measure BIO-6 (Land Use Adjacency Guidelines) and states that this is unacceptable. This comment also states that the EIR does not provide adequate buffers to protect important ecosystems. The City disagrees with this comment. Mitigation Measure BIO-6 comes directly from the Draft Santee MSCP Subarea Plan, which does not require buffers. However, based on the opinion of the biological experts who prepared the analysis, the design of development on the project site provides adequate buffers. Buffers on the project site are important for buffering development from the Habitat Preserve, which

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species, including special-status animal and plant species that occur or have the potential to occur in the Project area. Yet the DREIR does not follow the best available science and provide adequate buffers to protect these important ecosystems. In addition, the DREIR fails to adequately assess and mitigate impacts to riparian habitats, as shown by the grossly insufficient compensatory mitigation provided on-site in areas designated as “Impact Neutral,” within the Project footprint (DREIR Appendix D Biological Technical Report Appendix S Figure 3). The areas are mere segments of a much larger network of riparian corridors obliterated by the Project footprint (see DREIR Appendix D Biological Technical Report Figure 4-2) with unknown, and likely inadequate buffers; they do not provide adequate mitigation for riparian areas or wildlife connectivity and should be included in the calculations for permanent impacts to wetlands and riparian habitat, not as compensatory mitigation.

O6-46

Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions in a transition zone between freshwater systems and upland habitats. Many species that rely on these aquatic habitats also rely on the adjacent upland habitats (e.g., riparian areas along streams, and grassland habitat adjacent to wetlands). In fact, 60% of amphibian species, 16% of reptiles, 34% of birds and 12% of mammals in the Pacific Coast ecoregion depend on riparian-stream systems for survival (Kelsey and West 1998). Many other species, including mountain lions and bobcats, often use riparian areas and natural ridgelines as migration corridors or foraging habitat (Dickson et al, 2005; Hilty & Merenlender, 2004; Jennings & Lewison, 2013; Jennings & Zeller, 2017). Additionally, fish rely on healthy upland areas to influence suitable spawning habitat (Lohse et al. 2008), and agricultural encroachment on these habitats and over-aggressive removal of riparian areas have been identified as a major driver of declines in freshwater and anadromous fish as well as California freshwater shrimp (e.g., Stillwater Sciences 2002; Lohse et al. 2008; Moyle et al. 2011). Therefore, buffers that allow for connectivity between the aquatic resource and upland habitat is vital for many species to persist.

O6-47

It is estimated that 90-95% of historic riparian habitat in the state has been lost (Bowler, 1989; Riparian Habitat Joint Venture, 2009). Using 2002 land cover data from CalFire, the Riparian Habitat Joint Venture estimated that riparian vegetation makes up less than 0.5% of California’s total land area at about 360,000 acres (Riparian Habitat Joint Venture, 2004). This is alarming because riparian habitats perform a number of biological and physical functions that benefit wildlife, plants, and humans, and loss of what little is left will have severe, harmful impacts on special-status species, overall biodiversity, and ecosystem function. California cannot afford to lose more riparian habitat.

A literature review found that recommended buffers for wildlife often far exceeded 100 meters (~325 feet), well beyond the largest buffers implemented in practice (Robins 2002). For

is broadly connected to surrounding off-site open space. The project design includes wide fire-protection zones (i.e., 115 feet to 165 feet in some areas) around the two villages, outside the Habitat Preserve, which will buffer development from the Habitat Preserve while maintaining native vegetation. Please also refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

**O6-46:** This comment states that the EIR fails to adequately assess and mitigate impacts to riparian habitat and provides insufficient compensatory mitigation provided for areas designated as “Impact Neutral.” The City disagrees with this comment, based on the opinion of the biological experts who prepared the analysis, identified the recommended mitigation, and concluded that impacts are less than significant after mitigation. As stated in Section 4.3.4, impact neutral areas are areas that are not impacted by the proposed project, but for which the proposed project would not be requesting preservation credit because they are not included in the Habitat Preserve. However, the project design would preserve connectivity from the impact neutral areas containing ephemeral streams and riparian habitat to Sycamore Canyon Creek through culverts, thus providing additional habitat value overall. Therefore, functionality and habitat value of the impact neutral areas would be maintained. As shown on the Biological Resources Technical Report (Appendix D), Figures 5-

1g, 5-11, and 5-1m, the two impact neutral areas containing riparian habitat are both buffered by upland vegetation, including grassland and coastal sage scrub communities. The distance between development and the riparian area in the northern impact neutral area is between approximately 5 feet and 69 feet, with an average of 39 feet. The distance between development and the riparian area in the southern impact neutral area is between approximately 4 feet and 253 feet, with an average of 60 feet. Wetland buffers are typically determined on a case-by-case basis in consultation with CDFW, USFWS, and USACE. The width of the buffer is determined by factors such as type and size of development, sensitivity of the wetland resource to edge effects, topography, and the need for upland transition.

- O6-47:** This comment summarizes the importance of riparian ecosystems and states that the EIR should require a minimum buffer of 300 feet or more from all perennial and intermittent streams and wetlands throughout and adjacent to the project area. As a recommendation, this comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required on this point. However, the project design includes wide fuel modification zones (i.e., 115 feet to 165 feet in some areas) around the two villages, outside the Habitat Preserve, which will buffer

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O6-47  
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example, Kilgo et al. (1998) recommend more than 1,600 feet of riparian buffer to sustain bird diversity. In addition, amphibians, which are considered environmental health indicators, have been found to migrate over 1,000 feet between aquatic and terrestrial habitats through multiple life stages (Cushman, 2006; Fellers & Kleeman, 2007; Semlitsch & Bodie, 2003; Trenham & Shaffer, 2005). Accommodating the more long-range dispersers is vital for continued survival of species populations and/or recolonization following a local extinction (Semlitsch and Bodie 2003, Cushman 2006). In addition, more extensive buffers provide resiliency in the face of climate change-driven alterations to these habitats, which will cause shifts in species ranges and distributions (Cushman et al., 2013; Heller & Zavaleta, 2009; Warren et al., 2011). This emphasizes the need for sizeable riparian and upland buffers around streams and wetlands in and adjacent to the Project area, as well as connectivity corridors between heterogeneous habitats. To protect the Project area's highly diverse ecosystems and the services they provide, the DREIR should require a minimum buffer of 300 feet or more (depending on the needs of the species present or potentially present) from all perennial and intermittent streams and wetlands (including vernal pools) throughout and adjacent to the Project area. Again, the DREIR fails to adequately assess and mitigate impacts to wildlife movement and habitat connectivity. The DREIR should be revised and recirculate to address these insufficiencies.

O6-48

The DREIR fails to adequately assess and mitigate impacts to wildlife connectivity in oak woodlands. Oak woodlands provide valuable habitat and connectivity for a wide variety of species (Bernhardt & Swiecki, 2001; Jedlicka, Greenberg, & Raimondi, 2014; Lawrence, Deitch, & Resh, 2011; Tietje, Weller, & Yim, 2015). They are also important for many ecosystem services that communities rely on for safety and economic stability, including water quality protection, carbon sequestration, erosion control, and soil retention (Brown & Krygier, 1970; Elliot, 2010; Jedlicka et al., 2014; Lawrence et al., 2011; Moyle et al., 2011; Pan et al., 2011). Reduced woodland cover has been shown to result in increased runoff (*i.e.*, pollutants such as pesticides and fertilizers flowing into groundwater and surface waterways), erosion, sedimentation, and water temperatures; changes in channel morphology; decreased soil retention and fertility; and decreased terrestrial and aquatic biodiversity (Brown & Krygier, 1970; Dahlgren, Horwath, Tate, & Camping, 2003; Elliot, 2010; Houlihan & Findlay, 2004; Jedlicka et al., 2014; Lawrence et al., 2011; Lohse et al., 2008; Moyle et al., 2011; Opperman, Lohse, Brooks, Kelly, & Merenlender, 2005; Pess et al., 2002; Zhang & Hiscock, 2011). In addition, woodlands are an important carbon sink that can help moderate the impacts of climate change (Padilla, Vidal, Sánchez, & Pugnaire, 2010; Pan et al., 2011), and some researchers argue that at a global scale, trees are linked to increased precipitation and water availability (Ellison et al., 2012). The DREIR should adequately assess and mitigate impacts to sensitive habitats like oak woodlands so that these unique ecosystems and the invaluable services they provide, including wildlife connectivity, will not be lost.

development from the Habitat Preserve while maintaining native vegetation. Furthermore, Sycamore Canyon Creek is buffered by approximately 700 feet to 1,000 feet by Habitat Preserve and fuel modification zones, with the exception of the portion that occurs adjacent to the detention basin, which is buffered by approximately 70 feet. It should be noted that the 70-foot buffer is from manufactured slopes and does not account for topography, which may increase the distance from the edge of development to Sycamore Canyon Creek. Based on the opinion of the biological experts who prepared the analysis, the buffers provided are sufficient in the context of the comment's buffer recommendations.

The comment also states that the EIR fails to adequately assess and mitigate impacts to wildlife movement and habitat connectivity. Response to comments O6-37 through O6-44 address the same point. Also, please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

**O6-48:** This comment states that the EIR fails to adequately assess and mitigate impacts to wildlife connectivity in oak woodlands. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR adequately assesses impacts to wildlife connectivity in oak woodlands, recommends appropriate mitigation, and concludes that

such impacts will be less than significant after mitigation. Oak woodlands are a relatively small component of the project site, comprising 29.68 acres, of which 26.36 acres (89 percent) would be protected and managed in the Habitat Preserve per Mitigation Measure BIO-1 (Preserve Management Plan) and Mitigation Measure BIO-9 (Habitat Preserve Protection). Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity for further details.



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**E. The DREIR fails to adequately evaluate and mitigate impacts to the Quino checkerspot butterfly (*Euphydryas editha quino*).**

The Fanita Ranch site is considered a key component of Quino checkerspot butterfly (Quino) conservation and recovery due to the presence of over 1,700 acres of suitable Quino habitat, including host plants, and its spatial relationship to other populations; the project currently under review would impact over 580 acres of potential Quino habitat and fragment the remainder (Technology Associates International Corporation 2006 pp. 4-57-4-59; Harris & Associates & City of Santee 2020a p. 4.3-63, fig. 4.3-6a-c).

1. *The DREIR did not consider the long-term occupancy of all Quino life stages nor impacts to Quino metapopulation dynamics in what is likely a 'core' habitat patch.*

As a species, the Quino checkerspot butterfly exists in core-satellite metapopulations that consist of an interdependent network of populations on patches of suitable habitat that are geographically separated from each other by unsuitable habitat (USFWS 2009b). The core patches are those that are larger in area, more connected, and most consistently occupied, while the satellite populations are more likely to be occupied only in years of high population abundance due to individuals emigrating from the core patches (Hanski & Gyllenberg 1993). Quino checkerspot butterfly metapopulations have large (20-100 fold) population fluctuations over 10-20 years (Preston et al. 2012) and the survival of each butterfly population is dependent on both the local habitat resources as well as the movement of individuals between patches (Hanski & Gyllenberg 1993; Hellmann et al. 2004).

For purposes of environmental review, the Quino checkerspot butterfly can be thought of as two animals: (1) the winged adults, and (2) the less conspicuous eggs, larvae, and pupae that make up about 90% of the Quino's life cycle. The Quino checkerspot butterfly has evolved to survive in the hot, dry summers of southern California by entering diapause in its larval stage; larvae can undergo diapause for multiple years when food plants dry out, coming out only after periods of higher precipitation to complete their growth (USFWS 2009b; Preston et al. 2012). Larvae enter diapause in cracks in the soil, under logs or rocks, in leaf litter, or under bark, making them difficult to locate during surveys and leading to an incorrect conclusion that a site is unoccupied. FWS does not consider negative surveys credible if unfavorable conditions, such as drought, limit the detectability of the butterfly (USFWS 2009a). In the DREIR, it does not appear that the consulting biologists surveyed the project area or conducted any systematic search for Quino eggs, larvae, and pupae.

The DREIR does rely on previous habitat surveys and adult Quino sightings to determine the area impacts (Harris & Associates & City of Santee 2020a fig. 4.3-6a-c, Table 4.3-8a). Adult Quino surveys were conducted on the Fanita Ranch site in 2004, 2005, and 2016, and an

**O6-49:** This comment states that the proposed project would impact over 580 acres of potential Quino checkerspot butterfly (*Euphydryas editha quino*) habitat and fragment the remainder. The EIR includes an analysis of impacts to Quino checkerspot butterfly and wildlife corridors for wildlife movement. Please refer to Thematic Responses – Quino Checkerspot Butterfly and Wildlife Movement and Habitat Connectivity.

**O6-50:** This comment states that biologists did not survey the project site or conduct systematic search for Quino checkerspot butterfly eggs, larvae, and pupae. Focused Quino checkerspot butterfly surveys were conducted in accordance with the USFWS 2002 and 2016 protocol, and host plant mapping surveys were conducted according to the USFWS 2014 protocol. Immature life history stages were not recorded during focused surveys for Quino checkerspot butterfly in 2004, 2005, and 2016 or during host plant mapping surveys in 2016 and 2017. Please refer to Thematic Response – Quino Checkerspot Butterfly.

**O6-51:** This comment states that the EIR does not take into account how the project site is connected to nearby habitat patches, whether core or satellite, and its role in a Quino checkerspot butterfly metapopulation. Please refer to Thematic Response – Quino Checkerspot Butterfly. Further, based on the opinion of the biological experts who prepared the Biological Resources

O6-49

O6-50

O6-51

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 cont.

individual Quino was observed on the site in 2005. Although Quino were not detected on the site in 2016, San Diego County has experience drought conditions over the past several years that temporarily negatively affected Quino populations, causing low numbers in local surveys (Goebel & Sevrens 2016 p. 15). Adult Quino were seen adjacent to the Project site by the FWS in both 2018 and 2019 (Harris & Associates & City of Santee 2020a fig. 4.3-6c). If, in fact, Quino was temporarily absent within the Project area during poor climate years (as in 2016) but present in a more favorable climate (the FWS observations in 2018-2019), it would mean that the Quino is able to both recolonize and utilize the site currently and indicates the site's current suitability as important, connected, and likely core Quino habitat.

According to the final rule designating critical habitat for the Quino checkerspot (USFWS 2009a), a core population is a habitat patch where at least two of the following criteria apply: (1) 50 or more adults are reported during a single survey at least once; (2) immature life history stages are recorded; or (3) the geographic area within the metapopulation (within 0.6 mile of Quino checkerspot occurrences) is greater than 1,290 acres. According to the host plant mapping done in 2016 and 2017, the entire 2,635 acre project area contains suitable Quino habitat and there have been sightings of Quino adults within the project area in the last 20 years (Harris & Associates & City of Santee 2020b pp. 89-91), thus the project area is likely a core habitat patch but surveys for immature life stages are greatly needed.

At larger spatial and temporal scales of its occupancy, the Quino requires protection of both core and satellite habitat patches with connectivity to support metapopulation dynamics (USFWS 2009b). Even areas of low occupancy are critical to metapopulation survival, as they represent spill over areas for the less competitive individuals to establish and also enhance overall genetic diversity (Hanski & Gyllenberg 1993). Furthermore, low occupancy areas serve as what is known as the 'rescue effect' (Howe et al. 1991); if Quino checkerspot butterflies in adjacent areas suffer mortality, individuals can colonize adjacent habitat during years of high production of adults. As such, the Quino checkerspot butterfly requires a high level of connectivity between habitat areas in order to maintain these required metapopulation dynamics and survive in the region. In determining the size of the project's impact, the DREIR does not take into account how the project site is connected to nearby habitat patches, whether core or satellite, and its role in a Quino metapopulation.

Technical Report (Appendix D), the City disagrees that the proposed project is a core Quino checkerspot butterfly population as stated in the CBD petition filed with the California Fish and Game Commission in June 2020 based on the lack of USFWS Critical Habitat for this species occurring on the project site and due to negative focused surveys for Quino checkerspot butterfly on the project site conducted in 2004 and 2016. Based on that opinion, the City also disagrees that the proposed project is a core Quino checkerspot butterfly population as stated in the comment: 50 or more adults were not reported during a single survey at least once; immature life history stages were not recorded; and only one single observation was made in 2005, while survey results were negative in 2004 and 2016, and would not consider the geographic area within a metapopulation.

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2. *The loss and fragmentation of the core patch at the project site will disproportionately impact the Quino Checkerspot butterfly to an extent greater than the impacts stated in the DREIR and the mitigation proposed in the DREIR is not adequate due to the destruction and fragmentation of the Habitat Preserve.*

The DREIR states that suitable Quino habitat would be directly impacted by Project implementation and despite the 2016 focused surveys for this species being negative, the DREIR uses the '2009 model' of 581.39 acres impacted to determine significance for this species (Harris & Associates & City of Santee 2020a Table 4.3-8a). Mitigation specified for Quino in the DREIR states: "Impacts would be reduced to less than significant through the proposed Project's on-site Habitat Preserve outlined in Mitigation Measure BIO-1, which would conserve 1,096.57 acres of suitable habitat" (Harris & Associates & City of Santee 2020a Table 4.3-8a). However, the on-site Habitat Preserve as depicted in Figures 4.3-6a-c is completely fragmented with the impacted areas in the center (Harris & Associates & City of Santee 2020a fig. 4.3-6a-c). As such, the Habitat Preserve would result in large-scale fragmentation of high quality Quino habitat, a threat to the species survival and recovery.

For a large Quino checkerspot butterfly population to persist on a given site for many years and achieve population occupancy, the butterfly needs an expansive, connected heterogeneous area of habitat with diverse host plants, such as is maintained by the current intact habitat in and around the project area (Osborne & Redak 2000; Harris & Associates & City of Santee 2020b figs. 3-2). To complete their development into the pupal stage before host plants dry up and die for the season, larvae that come out of diapause seek microclimates with high solar insolation (Osborne & Redak 2000). Larvae pupate in the leaf litter or within native vegetation such as California Buckwheat (Pratt & Emmel 2010). As such, as a larva—the stage in which it spends most of its life—the Quino checkerspot butterfly requires heterogeneous habitat of both sunny southern facing slopes and shaded areas as well as both open areas with food plants and nearby areas with larger vegetation. Further, once the butterfly emerges from the cocoon, adult females must mate and lay eggs as well as seek nectar plants for feeding. Local habitat fragmentation from the project would result in less contiguous habitat for the Quino to carry out its life functions. This translates to female adult butterflies unable to obtain enough nearby nectar resources between bouts of egg laying, reducing energy levels and fecundity, thus significantly harming the butterfly by reducing reproductive output and jeopardizing the Quino in the region. The proposed Project breaks up the existing continuous expanse of large highly suitable habitat, an action that perpetuates the biggest threat to endangered species which is "death by a thousand cuts" and leads only to extinction (Whitehead et al. 2017). Unfortunately, the Quino checkerspot butterfly has been shown to be highly sensitive to proximal urban housing and infrastructure and the type of fragmentation proposed by this Project has led to its extinction in several southern California counties (Preston et al. 2012).

**O6-52:** This comment states that the Habitat Preserve would result in large-scale fragmentation of high quality Quino checkerspot butterfly habitat. Please refer to Thematic Response – Quino Checkerspot Butterfly. Mitigation for impacts to suitable habitat for Quino checkerspot butterfly will include a contiguous 900-acre block of habitat and a combination of in-perpetuity management of the Habitat Preserve that will focus on removal of non-native grasses, weedy material, and duff layers and the supplemental planting of host plant species so that habitat is more suitable for Quino checkerspot butterfly.

**O6-53:** This comment states that local habitat fragmentation from the proposed project would result in less contiguous habitat for Quino checkerspot butterfly to carry out its life functions. Please refer to Thematic Response – Quino Checkerspot Butterfly. Mitigation for impacts to suitable habitat for Quino checkerspot butterfly will include a combination of in-perpetuity management of the Habitat Preserve that will focus on removal of non-native grasses, weedy material, and duff layers and the supplemental planting of host plant species so that habitat is more suitable for Quino checkerspot butterfly.

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06-54 Further FWS and CDFW observed (Goebel & Sevrens 2016 pp. 15–16) that Fanita Ranch is within the possible future Central San Diego County recovery unit described in the Quino Recovery Plan and development on the site may preclude recovery of the Quino in the region:

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.

3. *The additional mitigation proposed in the DEIR relies on unproved restoration actions.*

06-55 Additional mitigation specified for Quino in the DREIR to reduce impacts to less than significant includes the Habitat Preserve outlined in BIO-1 but also further includes: “Mitigation Measure BIO-18, which would restore/enhance suitable habitat within temporary impact areas and through habitat management, including success criteria, specifically for this species” (Harris & Associates & City of Santee 2020a Table 4.3-8a). This is habitat management on the same 1,096.57 acres of the Habitat Preserve, so adds no additional habitat preservation or restoration for the Quino; specifically, the management includes (Harris & Associates & City of Santee 2020a p. 4.3-98–100):

[A] combination of in-perpetuity management of the Habitat Preserve that shall focus on removal of non-native grasses, weedy material, and duff layers and the supplemental planting of dot-seed plantain (*Plantago erecta*), woolly plantain (*Plantago patagonica*), Coulter’s snapdragon (*Antirrhinum coulterianum*), rigid bird’s beak (*Cordylanthus rigidus*), owl’s clover (*Castilleja exserta*), Chinese houses (*Collinsia concolor*), and purple Chinese houses (*Collinsia heterophylla*) so that habitat is more suitable for Quino checkerspot butterfly. This shall include an endowment or other acceptable permanent funding mechanism and documented management plan as outlined in the Preserve Management Plan (included as Appendix P in the Biological Technical Report for the

**06-54:** This comment states that the project site is within the possible future Central San Diego County recovery unit and development on the site may preclude recovery of the Quino checkerspot butterfly in the region. Please refer to Thematic Response – Quino Checkerspot Butterfly. First, the area is described as a “Possible Future” recovery unit, not a current one or proposed one. Based on the opinion of the biological experts who prepared the analysis, the City disagrees that the proposed project would preclude recovery of the Quino checkerspot butterfly based on the lack of USFWS Critical Habitat for this species occurring on the project site, lack of historical observations (see Table 1 in CBD petition which lists the historical occurrences and the 2009 USFWS 5-year Review which states that the proposed project Quino checkerspot butterfly occurrence status as “not documented, no historical records”), and due to negative focused surveys for Quino checkerspot butterfly on the project site conducted in 2004 and 2016.

**06-55:** This comment states that the City is relying on restoration of soon-to-be degraded and fragmented habitat to mitigate for losses to the Quino checkerspot butterfly. Please refer to Thematic Response – Quino Checkerspot Butterfly. Mitigation of suitable habitat shall be included in the Preserve Management Plan (Appendix P of the Biological Resources Technical

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O6-55  
 cont.

Fanita Ranch Project). Restoration/enhancement and creation of suitable habitat areas shall entail specific standards or guidelines on vegetation management.

Thus, the City is relying on restoration of soon-to-be degraded and fragmented habitat to mitigate for the losses to the Quino checkerspot butterfly and myriad other at-risk species. Based on a review of all available monitoring reports of enhancement/restoration projects to date that involve weeding, host plant seeding, no evidence exists that restoration efforts on such disturbed lands will be effective in sustaining Quino occupancy (AECOM 2010, 2013, 2015, 2016, 2017; Osborne 2013, 2014, 2015, 2016, 2017; Caltrans 2018; RECON Environmental, Inc. 2018, 2019; San Diego Habitat Conservancy 2019; HELIX Environmental Planning, Inc. 2019). Edge effects from surrounding and intermixed development and pervasive non-native grasses that destroy the intact soil conditions needed by Quino larvae also likely make impossible any future Quino habitat restoration (Osborne & Ballmer 2019).

The Preserve Management Plan also discusses creation of wildlife corridors (Harris & Associates & City of Santee 2020b pp. 50–60 Appendix P). Dispersing Quino adults can be inhibited from finding resources by barriers such as high walls, highways, and extensive patches of housing and adult Quino dispersing into inappropriate habitat, such as built environments, are lost to the metapopulation. (Osborne & Ballmer 2019 p. 6). Thus, placement of extensive areas of development within Quino habitat, such as this project, create barriers to dispersal and remove Quino adults from the functional population. While Quino corridors have been discussed and attempted, experts believe that (Osborne & Ballmer 2019 p. 6):

O6-56

Setting aside dispersal corridors (through a built environment) is a problematic attempt to maintain connectivity within the larger metapopulation and assumes the unlikely ability of dispersing Quino to recognize and remain within such corridors without wandering into the “dead zone” of adjacent urban landscapes. For designated dispersal “corridors” to be effective, they must be buffered sufficiently from bordering urban landscapes.

Further, despite the conjecture that large wildlife overpasses could effectively permit Quino dispersal across busy roads (Dudek & Associates, Inc. 2003 pp. 1–26), the “Quino bridge” constructed over Clinton Keith Road at the behest of FWS is considered by Quino experts to be biologically completely inefficacious (Osborne 2020).

Due to the high degree of uncertainty in restoration of Quino habitat and lack of evidence of Quino’s use of corridors, the project’s impacts remain significant with proposed mitigation. Further, if the project proceeded, the already rare Quino may become permanently extirpated and not return to such a disturbed area, as the remaining on-site habitat will be seriously degraded as a result of edge effects, invasive species, fragmentation, and human disturbance. Given the well

Report [Appendix D]) and occur in the following ways: preservation and management of existing suitable habitat within the Habitat Preserve, restoration/enhancement of existing suitable habitat within the Habitat Preserve, and creation of new suitable habitat areas within the Habitat Preserve and along manufactured slopes within development areas, as appropriate. Based on the opinion of the biological experts who prepared the analysis, impacts would be reduced to less than significant through the proposed project’s on-site Habitat Preserve, outlined in Mitigation Measure BIO-1, which would conserve 1,096.57 acres of suitable habitat, and Mitigation Measure BIO-18, which would restore/enhance suitable habitat within the Habitat Preserve and through habitat management, including success criteria, specifically for this species. Although this species-specific restored/enhanced and created suitable habitat is in the Habitat Preserve, it is not currently suitable habitat for this species.

**O6-56:** This comment states that placement of extensive areas of development in Quino checkerspot butterfly habitat, such as the proposed project, create barriers to dispersal and remove Quino checkerspot butterfly adults from the functional population. Please refer to Thematic Response – Quino Checkerspot Butterfly. Despite habitat loss and some fragmentation, based on the opinion of the biological experts who prepared the

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O6-56  
 cont.

documented effects of nearby incremental development on Quino populations (Preston et al. 2012), there is no reason to believe that the undeveloped habitat will ensure that the affected population will be able to survive in the long term. Even if the proposed mitigations were successful, they could not compensate for loss of high-quality habitat in the project area that contains larval resources, diversity of vegetative and topographic features, and has contributed to the Quino checkerspot butterfly's long-term population stability in the area.

O6-57

**F. The DREIR fails to adequately evaluate and mitigate impacts to the Hermes copper butterfly (*Lycaena hermes*).**

A total of 2,426.06 acres or nearly the entire project area represents FWS proposed designated critical habitat for the Hermes copper butterfly (Hermes copper), a species recently proposed for listing as threatened under the Endangered Species Act (USFWS 2020 pp. 1034–1050; Harris & Associates & City of Santee 2020a p. 4.3-48).

1. *The DREIR greatly underestimates the impact to the Hermes copper and its critical habitat.*

O6-58

The DREIR dismisses the FWS critical habitat designation by stating that the FWS modeling “is based on a combination of internal and external opinion and buffering of assumed habitat and does not take into account the site-specific suitable habitat. In this instance, suitable habitat refers to redberry buckthorn within 15 feet of California buckwheat. Therefore, proposed USFWS Critical Habitat designations can overestimate the actual suitable habitat within an area and include many acres of unsuitable habitat” (Harris & Associates & City of Santee 2020a p. 4.3-48). Instead, “specifically for the Project,” the DREIR dissects the proposed USFWS Critical Habitat based on one year (2004) of a positive field survey for the Hermes copper and host plant mapping conducted in two years (Harris & Associates & City of Santee 2020b Table 5-5c, 2020a Tables 4.3-15 & 4.3-8a); despite the FWS determination that Hermes copper population-level resilience needs are met and resource availability should be assessed on a “scale over a period of decades” (USFWS 2018 p. 31).

O6-59

The City determined that the proposed Project would result in impacts to 974.11 acres of proposed Critical Habitat for Hermes copper but only 52.98 acres would be considered potentially suitable habitat for this species (Harris & Associates & City of Santee 2020b Table 5-5c, 2020a Table 4.3-8a&8c). This 52.98 acres includes 44.73 acres of potentially suitable habitat and 8.25 acres of potentially suitable habitat within 500 feet of a previously known occurrence of the Hermes copper butterfly; this 52.98 acres forms the basis of the mitigation for the Hermes copper (Harris & Associates & City of Santee 2020a p. 4.3-99–100). The vast majority of the 52.98 acres of “potentially suitable habitat” that are considered occur directly in the Project development footprint (Harris & Associates & City of Santee 2020b figs. 5–5c).

analysis, the EIR describes how the proposed project would maintain the functions of both regional and local wildlife movement and habitat connectivity consistent with the generally accepted principles of wildlife movement and the Draft Santee MSCP Subarea Plan Guidelines, and thus reduce impacts to a less than significant level. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

**O6-57:** This comment states that the project site represents USFWS proposed designated Critical Habitat for Hermes copper butterfly (*Lycaena hermes*). The Biological Resources Technical Report (Appendix D) is consistent with the comment and states that there is a total of 2,426.06 acres of proposed USFWS Critical Habitat for Hermes copper butterfly that occurs on the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O6-58:** This comment states that the EIR dismisses the USFWS Critical Habitat designation for Hermes copper butterfly. The Biological Resources Technical Report (Appendix D) states that there is a total of 2,426.06 acres of proposed USFWS Critical Habitat for Hermes copper butterfly that occurs on the project site. Proposed USFWS Critical Habitat designations can overestimate

the actual suitable habitat within an area and include many acres of unsuitable habitat (e.g., areas where redberry buckthorn (*Rhamnus crocea*) and/or California buckwheat (*Eriogonum fasciculatum*) are not present). Additionally, there have been two negative protocol surveys performed in 2016 and 2020. Therefore, based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the site is currently unoccupied. Please refer to Thematic Response – Hermes Copper Butterfly.

- O6-59:** This comment states that the City dismisses the majority of Critical Habitat by conducting their own analysis instead of following the habitat criteria outlined by USFWS to determine the impacts to Hermes copper butterfly. Based on the analysis prepared by the biological experts, the EIR analyzes impacts to Hermes copper butterfly Critical Habitat, concluding that there are a total of 974.11 acres of impacts within the proposed Critical Habitat for Hermes copper, 52.98 acres of which would be considered potentially suitable habitat for this species based on the presence of the obligate host plant redberry buckthorn and nearby California buckwheat for nectaring. These 52.98 acres are impacted by proposed development, while it is noted in Table 5-1a of the Biological Resources Technical Report (Appendix D) that there is a total of 148.44 acres of suitable habitat on the project site, of which 95.46 acres of suitable habitat

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O6-59 cont. By breaking down the impact to the Hermes copper habitat into these tiny fragments, the City dismisses that vast majority of critical habitat by conducting their own limited analysis instead of following the habitat criteria outlined by FWS to determine the impacts to the threatened Hermes copper. When proposing Hermes copper critical habitat, the FWS relied on the best available scientific information, and took into account the “physical and biological features that are essential to the conservation of the species” including “space for individual and population growth and for normal behavior; food, water, air, light, minerals, or other nutritional or physiological requirements; cover or shelter; sites for breeding, reproduction, or rearing (or development) of offspring; and habitats that are protected from disturbance or are representative of the historic geographical and ecological distributions of the species” (USFWS 2020 p. 1032). For the Hermes copper, therefore, more than just “redberry buckthorn within 15 feet of California buckwheat,” the FWS also considered the following as components of Hermes copper habitat that contribute to its survival: patches of spiny redberry host plants and nectar sources including but not limited to California buckwheat that support functional metapopulation dynamics, structurally complex spiny redberry for egg, larval, and pupal development, connective habitat areas with nectar sources, these include spatial and temporal as well as individual ecological needs, as assessed at the “adult male territory scale” (USFWS 2020 pp. 1023, 1032–1033).

O6-60 This City’s approach in the DREIR is arbitrary and denies the “combination of internal and external opinion” of species experts as well as the “buffering of assumed habitat” the FWS used to determine the entire habitat extent needed for the Hermes copper to complete its life cycle and functions in order to survive in a region (USFWS 2020; Harris & Associates & City of Santee 2020a p. 4.3-48). As such, the DREIR greatly underestimates the impacts to the Hermes copper and its habitat.

O6-61 2. *The mitigation proposed in the DREIR is not adequate due to the destruction and fragmentation of the Habitat Preserve.*

O6-62 Mitigation specified for Hermes copper in the DREIR states: “Impacts would be reduced to less than significant through the proposed project’s on-site Habitat Preserve outlined in Mitigation Measure BIO-1 and Mitigation Measure BIO-18, which would conserve 94.77 acres of potential suitable habitat containing two historical locations” (Harris & Associates & City of Santee 2020a Table 4.3-8a). However, the on-site Habitat Preserve as depicted in Figures 4.3-7 is completely fragmented with the impacted areas in the center (Harris & Associates & City of Santee 2020a fig. 4.3-7). As such, the Habitat Preserve would result in large-scale fragmentation of Hermes copper habitat, a threat to the species survival and recovery.

would not be impacted. Proposed USFWS Critical Habitat designations can overestimate the actual suitable habitat within an area and include many acres of unsuitable habitat (e.g., areas where the obligate host redberry buckthorn and/or California buckwheat are not present). Therefore, the EIR analysis, prepared by biological experts, is based on more detailed site-specific assessment and includes a breakdown of suitability within the proposed USFWS Critical Habitat mapping based on field surveys for the Hermes copper butterfly host plant species conducted specifically for this project. Please refer to Thematic Response – Hermes Copper Butterfly.

**O6-60:** This comment states that the EIR underestimates the impacts to Hermes copper butterfly and its habitat by not using the USFWS analysis. The City disagrees with this comment. As described in response to comment O6-59, the EIR provides a more detailed and precise analysis of suitability within the proposed USFWS Critical Habitat mapping based on field surveys, whereas the USFWS Critical Habitat designation, which was not based on detailed site-specific surveys, overestimated the actual suitable habitat within the project site and included areas of unsuitable habitat. The survey and habitat assessment conducted for this species indicated that the area on the project site that would meet the requirements to be designated as Critical Habitat is much smaller than



proposed by USFWS. The survey and habitat assessment constitute the best available scientific information available for the project site and will need to be taken into account by USFWS during the final listing decision. It is expected that based on that information, the size of the Critical Habitat designation will be substantially reduced. Please refer to Thematic Response – Hermes Copper Butterfly.

- O6-61:** This comment states that the mitigation proposed in the EIR for Hermes copper butterfly is not adequate due to the destruction and fragmentation of the Habitat Preserve. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the assessment and identified the recommended mitigation, the impacts would be reduced to less than significant through implementation of the proposed project's on-site Habitat Preserve outlined in Mitigation Measure BIO-1 and Mitigation Measure BIO-18. Potentially suitable habitat would be conserved through implementation of mitigation that would reduce impacts to less than significant under CEQA. Please refer to Thematic Response – Hermes Copper Butterfly.
- O6-62:** This comment states that the Habitat Preserve would result in large-scale fragmentation of Hermes copper butterfly habitat. The proposed project includes a 900-acre block of contiguous open space contained within the Habitat Preserve and connects to other preserves in the

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 cont.

According to the FWS proposed listing rule, the Hermes copper needs “within-habitat patch connectivity—an unfragmented habitat patch where reproduction occurs” and that “butterflies must be free and likely to move among individual host plants and patches of host plants within a habitat patch” (USFWS 2020 p. 1021). Much like the Quino checkerspot butterfly, the Hermes copper is unlikely to traverse barriers such as urban development and this disproportionately impacted by local habitat fragmentation (USFWS 2020 p. 1026). The development footprint put forth in the DEIR fragments Hermes copper suitable habitat as well as the Habitat Preserve and the results in less contiguous habitat for the Hermes copper to carry out its life functions (USFWS 2020 p. 1023; Harris & Associates & City of Santee 2020b figs. 5-5c). Urban development within San Diego County has resulted in the loss, fragmentation, and isolation of Hermes copper habitat and is responsible for upwards of 46% of known extirpations, according to the FWS (USFWS 2020 p. 1025). Should it be allowed to proceed in any form, the project would break up the existing continuous expanse of large highly suitable habitat, an action that perpetuates the biggest threat to endangered species which is “death by a thousand cuts” and leads only to extinction (Whitehead et al. 2017)

3. *The project will increase wildfire frequency, a major threat to the Hermes copper butterfly.*

O6-63

The Hermes copper’s (and Quino checkerspot butterfly’s) habitat of chaparral and sage scrub is adapted to large infrequent fires (every 30 to 150 years) and if these regimes are disrupted, the habitat becomes degraded (Keeley 2005, 2006; USFWS 2020 p. 1024). When fires occur too frequently, native shrublands are replaced by non-native grasses and forbs that burn more frequently and more easily, ultimately eliminating native habitats and biodiversity while increasing fire threat over time (Keeley 2005, 2006; Syphard et al. 2009; Safford & Van de Water 2014). The increasing frequency and severity of fires in the Hermes copper’s habitat is a major threat to the butterfly due to the increased mortality, extirpations, the time it takes for the habitat to be recolonized after wildfire and the resulting isolation, as well as the increase in invasive plants after fire (USFWS 2020 pp. 1024-1025).

There is a history of frequent wildfire in the Project area and greater vicinity, including over the last 20 years (Harris & Associates & City of Santee 2020b figs. 1-4). Along with climate change, sprawl developments like the project lead to more frequent wildfires caused by human ignitions like power lines, arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Keeley et al. 1999; Keeley & Fotheringham 2003; Bistinas et al. 2013; Balch et al. 2017; Keeley & Syphard 2018; Radeloff et al. 2018; Syphard et al. 2019; Williams et al. 2019). Thus, as climate change results in increased fire frequency, the project will be even more detrimental to the butterflies and their habitat. The DREIR mentions wildfire as an indirect threat, along with pesticides, dust, and trampling, among

vicinity. The Habitat Preserve allows for wildlife movement and includes corridors with buffers from development. Please refer to Thematic Response – Hermes Copper Butterfly.

**O6-63:** This comment states that the increasing frequency and severity of fires in the Hermes copper butterfly habitat is a threat to the butterfly. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required on this point. However, fire frequency is expected to decrease with project implementation; see the Fire Protection Plan (Appendix P1) for details. Additionally, Section 4.6 of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]) includes adaptive management strategies for revegetation of the Habitat Preserve after a fire. Please refer to Thematic Response – Hermes Copper Butterfly.

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 cont.

others, but does not analyze these indirect threats nor consider mitigation to reduce the impact to the Hermes copper butterfly (Harris & Associates & City of Santee 2020a p. 4.3-77-80).

4. *The reliance on the Habitat Preserve as mitigation for a diversity of at-risk species compromises its effectiveness to conserve the Hermes copper and Quino checkerspot butterflies.*

O6-64

The DREIR relies on the same 1,650.38 acres as mitigation, described as mitigation measure BIO-1 (Harris & Associates & City of Santee 2020a p. 4.3-79-80), to purportedly reduce the impacts to several threatened species in addition to the Quino checkerspot and Hermes copper butterfly: the western spadefoot toad, Southern California legless lizard, California glossy snake, San Diegan tiger whiptail, Red diamondback rattlesnake, Blainville's horned lizard, Coronado Island skink, Belding's orange-throated whiptail, Coast patch-nosed snake, Two-striped garter snake, Cooper's Hawk, Southern California rufous-crowned sparrow, Grasshopper sparrow, Golden eagle, Bell's sage sparrow, Long-eared owl, Oak titmouse, Coastal cactus wren, Northern harrier, Merlin, Prairie falcon, American peregrine falcon, Yellow-breasted chat, Loggerhead shrike, Coastal California gnatcatcher, Rufous hummingbird, Brewer's sparrow, Yellow warbler, Least Bell's vireo, White-tailed kite, California horned lark, pallid bat, Dulzura pocket mouse, Townsend's big-eared bat, Western mastiff bat, Western red bat, Western yellow bat, Long-eared myotis, Western small-footed myotis, Yuma myotis, Pocketed free-tailed bat, Big free-tailed bat, San Diego black-tailed jackrabbit, Northwestern San Diego pocket mouse, San Diego woodrat, and the San Diego fairy shrimp (Harris & Associates & City of Santee 2020a Table 4.3-8a). All of these imperiled species are losing habitat due to the Project, resulting in a reduction and net loss of the area they currently use and are adapted to for their life functions, many of which are predators or competitors with the Quino checkerspot and Hermes copper butterflies. Habitat loss creates increases in competition, predation, and parasitism in at least the short-term that could result in overall lower numbers of the imperiled species in the long-term (Nee & May 1992; Flockhart et al. 2015; Cameron & Sadd 2019). Thus, reliance on the same mitigation habitat set-aside for several separate species compromises the effectiveness of the mitigation.

**G. The DREIR fails to adequately evaluate and mitigate impacts to the Crotch bumble bee (*Bombus crotchii*).**

O6-65

The Crotch bumble bee became a candidate for listing, and therefore protected, as endangered under CESA in June 2019. Impacts to the Crotch bumble bee were not considered in the DREIR but due to the likelihood of the bee's occurrence in the Project area, impacts to this protected species and its habitat must be evaluated and mitigated. The Crotch bumble bee has declined by an average of 67.51% with a nearly 98% reduction in abundance and is considered endangered by the International Union for the Conservation of Nature (Hatfield et al. 2015 p. 19;

**O6-64:** This comment states that habitat loss creates increases in competition, predation, and parasitism, and, thus, reliance on the same mitigation habitat for several separate species compromises the effectiveness of the mitigation. The City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis in the Biological Resources Technical Report (Appendix D), the comment is illogical and conflicts with the well-accepted conservation principal of preserving large habitat blocks that support diverse and rich species assemblages, even if some level of predation or competition occurs. The comment does not propose an appropriate alternative to a multi-species Habitat Preserve. As stated in Mitigation Measure BIO-1, Preserve Management Plan, the proposed project shall preserve in perpetuity a total of 1,650 acres of on-site open space, as a result of impacts to 862.09 acres (including on- and off-site areas) of sensitive upland vegetation communities. Therefore, Mitigation Measure BIO-1 includes an on-site Habitat Preserve as mitigation for potentially occurring species. Based on the opinion of the biological experts who prepared the analysis, the recommended mitigation, including the Habitat Preserve, provides suitable habitat for a diverse set of potentially occurring species, and there is no evidence, based on the general threat factors often cited for the special-status species, that existing competition, predation, and parasitism would be significantly altered

or increased, although habitat management actions such as enhancement or restoration will need to consider potential unintended consequences for suites of species (e.g., grassland species versus coastal sage scrub species). Special-status species and suitable habitats are discussed in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species and impacts are summarized in Table 4.3-8a. Direct Impacts to Special-Status Wildlife Species. The proposed project would result in potentially significant impacts to special-status species and mitigation measures are proposed to reduce impacts to less than significant. These measures have been recommended by biological experts and prepared in compliance with CEQA requirements for mitigation measures, using the best available scientific information, and would be implemented through a Mitigation Monitoring and Reporting Program, including a Preserve Manager and permanent funding of the costs to manage and monitor the preserve, to ensure they are implemented.

- O6-65:** This comment states that impacts to the Crotch bumble bee were not considered in the EIR, but due to clear evidence of the species' occurrence in the project area, impacts to this species and its habitat must be evaluated and mitigated. The City disagrees that the species was not considered. It is evaluated in Appendix N (Special-Status Wildlife Species Potential to Occur within the Project Area) of Appendix D (Biological Resources

Technical Report) of the EIR. There, based on the opinion of the biological experts preparing the analysis, it was determined to have low potential to occur based on a lack of suitable habitat on site. While generically it is described as inhabiting grasslands and scrub habitat, the listing petition (Xerces Society et al 2018; pages 37 and 38) emphasizes the species' association with prairies, less disturbed grasslands and wildflower fields, and on page 32 says that it inhabits “open grassland and scrub habitats”—inferring that the scrub habitat is open as well. Since the comment continues by saying that the species was historically common in the Central Valley, it is assumed that the once rich wildflower grasslands and open salt scrub habitats is what it is referring to. Based on the opinion of the biological experts preparing the Biological Resources Technical Report (Appendix D), the City disagrees that the species has been found on the project site, much less the project footprint as the commenter states. A review of CNDDDB data for this little-known species shows two historical locations: 2010, approximately 2.5 miles northwest, and 1981, approximately 4 miles to the southwest. Based on a review of CNDDDB records, there are locations from the Borrego Springs area in the desert (1952), as far south as Otay Mesa (1998), as far east as Corn Spring in the desert Chuckwalla Mountains (1993), on Santa Rosa and Santa Cruz islands (1941, 1990s), and as far north as Red Bluff (1956). This is a difficult species to identify and

the workers and males can have different coloration patterns from the queens and there are gradients within each (Williams et al. 2014; Koch et al. 2012) potentially making them difficult to differentiate from other species. There are a number of other species with roughly similar coloration patterning. Based on the fact that the habitats present on the project site do not resemble those described in the petition, the erroneous assertion that they have been found on site, and the lack of knowledge about the species (e.g., habitat usages, population status, basic biological requirements; lack of survey protocol), in the opinion of the biological experts who prepared the analysis, the low potential assessment and thus would not require additional surveys or analysis. CEQA requires that a project is analyzed using the best available information. Further, it should be noted that CDFW, the lead agency reviewing the petition, did not raise this as an issue in their comment letter. Finally, the legality of listing the bees is currently in litigation, with a decision expected in December 2020. Briefly, the question is whether bees can be called “fish” and therefore listed as an invertebrate because insects are not specifically cited as eligible for listing. Aquatic invertebrates were considered under the “fish” category previously, but now the petitioners are arguing that any invertebrate can be categorized as a fish.

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The Xerces Society for Invertebrate Conservation et al. 2018 pp. 9–11). The Crotch bumble bee was historically common throughout southern California but has become extirpated due to agricultural intensification and is now threatened by development in Southern California such as this Project (Hatfield et al. 2015 p. 19; The Xerces Society for Invertebrate Conservation et al. 2018 p. 9).

Despite the species’ decline, there is clear evidence that Crotch bumble bee has been present in the Project’s footprint within the last 18 years, the time period that is considered “current” by bumble bee experts (The Xerces Society for Invertebrate Conservation et al. 2018 pp. 10, 114). Despite this, no species or habitat surveys were performed for the Crotch bumble bee as part of the DREIR. Yet the Project could further imperil this endangered species, potentially resulting in local if not regional extinction. Therefore, impacts to the Crotch bumble bee at the individual, population, and habitat level must be analyzed and mitigated.

O6-65  
 cont.

As a first step, the presence and distribution of the species and its habitat in the Project area must be evaluated. Although survey protocols are not standardized for this species, surveys have been created for other generalist bumble bees, such as the federally endangered Rusty Patched Bumble bee (*Bombus affinis*) (USFWS 2018), and a similar approach should be used here. Further, generalized bumble bee ecology, such as discussed in the CESA petition (The Xerces Society for Invertebrate Conservation et al. 2018 pp. 30–33), can be utilized to determine habitat requirements: “All bumble bees have three basic habitat requirements: suitable nesting sites for the colonies, availability of nectar and pollen from floral resources throughout the duration of the colony period (spring, summer, fall), and suitable overwintering sites for the queens”; as well as habitat “free from exposure to high levels of” pathogens and pesticides (The Xerces Society for Invertebrate Conservation et al. 2018 p. 30). The Crotch bumble bee, specifically, inhabits open grasslands and scrub habitats from late February to late October, primarily nesting underground in abandoned animal-made holes and overwintering in soil or under litter. The Crotch bumble therefore requires floral resources from February to October and due to its “very short tongue” is “best suited to forage at open flowers with short corollas” (The Xerces Society for Invertebrate Conservation et al. 2018 pp. 32–33).

**III. THE DREIR CAN AND SHOULD DO MORE TO MITIGATE THE PROJECT’S MASSIVE GHG EMISSIONS.**

O6-66

The Project will result in massive amount of GHG emissions over a 30-year life span. Construction emissions alone for the project are anticipated to be 37,442.16 metric tons (MT) of CO<sub>2</sub>e. (DREIR at p.4.7-22.) While the DREIR claims that a series of “mitigation measures” will reduce the annual anticipated emissions from 36,105.37 MT of CO<sub>2</sub>e per year to 12,606.51 MT of CO<sub>2</sub>e per year, those assumptions are dubious and unsupported. Even with the assumed

**O6-66:** This comment repeats the fact that the proposed project will mitigate its GHG emissions to 12,606.51 MT CO<sub>2</sub>e per year. As explained thoroughly in the EIR, the recommended mitigation measures would ensure that the proposed project reduces all GHG emissions below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR. In addition, please refer to Thematic Response – 2017 Scoping Plan.

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 cont.

reductions in GHG emissions, the project will still result in over 375,000 MT of CO<sub>2</sub>e. (DEIR at p. 4-7-26.) The DEIR can and should do more to mitigate the Project's GHG emissions.

**A. Climate continues to be one of the most pressing threats to California.**

Recent science has made clear that human-caused climate change is causing widespread harms to human society and natural systems, and climate change threats are becoming increasingly dangerous. In its 2018 *Special Report on Global Warming of 1.5°C*, the Intergovernmental Panel on Climate Change ("IPCC")—the leading international scientific body for the assessment of climate change—describes the devastating harms that would occur at 2°C warming. The report highlights the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth (IPCC 2018). The report also provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

O6-67

The impacts of climate change are already being felt by humans and wildlife. Thousands of studies conducted by researchers around the world have documented changes in surface, atmospheric, and oceanic temperatures; melting glaciers; diminishing snow cover; shrinking sea ice; rising sea levels; ocean acidification; and increasing atmospheric water vapor (USGCRP 2017). In California, climate change will transform our climate, resulting in impacts including, but not limited to, increased temperatures and wildfires and a reduction in snowpack and precipitation levels and water availability.

Although some sources of GHG emissions may appear insignificant in isolation, climate change is a problem with cumulative impacts and effects. (*Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 9<sup>th</sup> Cir. 2008) 538 F.3d 1172, 1217 ["the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis" that agencies must conduct].) One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California's climate as a whole. Therefore, project-specific GHG emissions disclosure, analysis and mitigation is vital to California meeting its climate goals and maintaining our climate.

**B. The City should require the Project to adopt additional GHG mitigation measures.**

O6-68

It is the "policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects." (Pub. Res. Code § 21002.) Adoption of additional feasible mitigation measures during construction and operation of the

**O6-67:** This comment provides an introduction to the balance of the GHG comments. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O6-68:** The proposed project would implement all feasible mitigation to ensure that GHG emissions are reduced below a level of significance as required by CEQA. Each of the recommended mitigation measures require on-site construction or operational changes to the proposed project. Therefore, this issue is adequately addressed in the EIR.

In addition, please refer to Thematic Response – 2017 Scoping Plan.



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 cont.

Project would lower the Project's overall GHG emissions and its contribution to climate change. Nonetheless, the Project includes only a small list of on-site GHG mitigation measures, despite the Project's significant GHG emissions during construction and operation of the Project. (DREIR at p. 4.7-25-26).

The 2017 Scoping Plan Update includes many feasible mitigation measures the Project can and should incorporate. (CARB 2017.) The California Air Pollution Control Officers Association ("CAPCOA") also has prepared a list of suggested mitigation measures to be considered by lead agencies approving projects with potentially significant GHG emissions. (CAPCOA 2010). Both CAPCOA and the Scoping Plan prioritize the use of on-site mitigation measures for GHG emissions, particularly for VMT related emissions. (CARB Scoping Plan at 102 "[t]o the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from VMT, and direct investments in GHG reductions within the project's region that contribute potential air quality, health, and economic co-benefits locally".)

O6-69

Facilitating the purchase of some electric vehicles or taking small measures to reduce energy use will not be enough to meet our regional and state level climate goals. "CARB's 2030 Scoping Plan Update 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." (CARB 2018 Progress Report at 27, citing CARB 2017 Scoping Plan and Executive Order B-55-18, September 2018.) What is more, CARB points out that "[e]ven if the share of new car sales that are EVs grows nearly 10-fold from today, California would still need to reduce VMT per capita 25 percent to achieve the necessary reductions for 2030." (*Id.* at 28.)

Put simply, 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. (CARB Progress Report 2018 at 27.) If the City chooses to move forward with the Project it should not settle for a project that will result in hundreds of thousands of new GHG emissions. Instead the City should require the Project reduce its GHG emissions further and achieve net zero as other projects in the state have done. Through a combination of additional on-site mitigation measures and local offsets, the Project can reduce its GHG emissions to net zero. The City's failure here to mandate adoption of all feasible mitigation measures allows the project off the hook and only worsens California climate crisis.

**O6-69:** This comment states the measures taken by the proposed project to reduce energy use will not be enough to meet the regional or state level climate goals. Please refer to Thematic Response – 2017 Scoping Plan.

The City has prioritized on-site GHG mitigation consistent with CARB's recommendation. All of the GHG measures require construction or operational changes to the proposed project or the project site. As explained thoroughly in the EIR, the recommended mitigation measures would ensure that the project reduces all GHG emissions below a level of significance as required by CEQA. Therefore, no further mitigation is required and this issue is adequately addressed in the EIR.

In addition, Section 4.16.5.2 of the EIR includes a thorough analysis of VMT. As explained therein, Mitigation Measure AIR-6, which requires preparation and implementation of a Transportation Demand Management Plan, would lessen project impacts associated with VMT, although not to a less than significant level. Transportation impacts would thus remain significant and unavoidable.

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 06-72

**IV. THE DREIR MUST FULLY DISCLOSE THE PROJECT'S LAND USE PLANNING CONFLICTS.**

The DREIR states that the proposed land use plan would be consistent with the Fanita Ranch Subunit of the City's Draft MSCP Subarea Plan. However, the Project's consistency with the MSCP must also be evaluated, as the MSCP Subarea Plan is in draft form only and has not been approved by the USFWS. Moreover, the USFWS appears unlikely to approve the Draft MSCP Subarea Plan in its current form, as USFWS staff believe the Subarea Plan is incomplete and inconsistent with governing federal law (section 10 of the Endangered Species Act). (USFWS 2019). These concerns relate primarily to the Fanita Ranch subunit of the Subarea Plan. As such, the DREIR fails to adequately address and disclose the Project's inconsistencies with the MSCP and with federal law, including the Endangered Species Act.

**V. THE DREIR FAILS TO ADEQUATELY ANALYZE THE PROJECT'S IMPACTS ON WATER SUPPLIES**

California faces immense challenges in its effort to allocate and conserve its limited water resources in the face of climate change and population growth. The Project would further exacerbate regional and statewide supply issues by constructing water intensive residential communities in arid San Diego County. Previous analysis of the Project's water supply impacts violated CEQA, and the novel approach utilized by the DREIR again fails to properly disclose, analyze and mitigate the Project's water supply impacts. The Project will get its water from the Padre Dam Municipal Water District (PDMWD), which completely depends on supplies from the San Diego County Water Authority (SDCWA). (DREIR at 4.17-1-2.) The DREIR analysis relies on multiple planning documents from various water suppliers, and the uncertainty of future supply and demand are compounded at each step as speculative projections move from local to regional. In light of these, and other, underlying concerns, the DREIR's conclusion that supplying water to the Project's will have a less than significant impact on the environment is not supported by substantial evidence.

**A. The thresholds of significance used in the DREIR improperly limit the water supply analysis.**

The DREIR does not analyze the Project's effects on state and regional water supplies. The water supply analysis was inappropriately narrow in scope because the chosen thresholds of significance only address the ability to supply the Project, without assessing the wisdom of allocating such quantities in this manner, or the implications for state and regional supply regimes. The DREIR used two criteria provided by the CEQA Guidelines to determine the

**06-70:** The comment states that the EIR would be consistent with the proposed 2018 Draft Santee MSCP Subarea Plan. The comment also states that this is problematic because the Draft Santee MSCP Subarea Plan has not yet been approved or permitted by USFWS. The EIR provides mitigation to reduce impacts to less than significant in accordance with CEQA guidelines and based on the mitigation recommended by the biological experts preparing the analysis. The EIR does not rely upon the adoption and approval of the subarea plan for its impact conclusions or for its mitigation. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is still used as the guidance document for projects occurring in the City. The EIR is consistent with the Draft Santee MSCP Subarea Plan, which would serve as a HCP pursuant to Section 10(a)(1)(B) of FESA, and as an NCCP pursuant to the California NCCP Act of 1991. Regarding the commenters statement about the likely approval of the Draft Santee MSCP Subarea Plan, if the Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit. Please refer to the Thematic Response – Draft Santee MSCP Subarea Plan for further details. This comment does not raise a significant environmental issue regarding the adequacy

or accuracy of information provided in the EIR. Therefore, no further response is required.

- O6-71:** This comment provides an introduction to comments O6-72 through O6-80, claiming that the conclusion in the EIR that water supply related impacts for the proposed project would be less than significant is not supported by substantial evidence. This comment also appears to criticize the EIR for relying on “multiple planning documents from various water suppliers” but such reliance is not only encouraged but required to show substantial evidence. See responses to comments O6-72 to O6-80.
- O6-72:** This comment claims two of the significance thresholds from Appendix G of the CEQA Guidelines used in the EIR to address water supplies for the proposed project (citing page 4.17-10 of the EIR) are insufficient without proposing any alternative thresholds. Specifically, the comment refers to Threshold 1 regarding new or expanded water facilities that could cause significant environmental effects (see Section 4.17.5 of the EIR) and Threshold 2, which asks whether the proposed project “would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years” (see Section 4.17.5.2 of the EIR).

The comment acknowledges the City’s discretion to use the Appendix G checklist in analyzing the proposed project’s impacts but claims in comment O6-72 that the “analysis should be revised, using thresholds of significance that account for the Project’s impact on the water supply system, not simply its paper-water entitlements.” The comment appears to call into question State and federal water policy that is outside the purview of the CEQA. The analysis conducted for the proposed project pursuant to the significance threshold question in Appendix G, Section XIX(b), is consistent with water supply planning laws and case law interpreting such laws. In fact, Appendix G, Section XIX(b) was recently modified as part of the extensive 2018 update to the CEQA Guidelines adopted by the Natural Resources Agency to “better reflect the factors identified by the Supreme Court in *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, as well as the water supply assessment and verifications statutes (Wat. Code, § 10910, Gov. Code, § 66473.7)” (see California Natural Resources Agency Final Statement of Reasons for Regulatory Action Amendments to the State CEQA Guidelines, November 2018).

More specifically, under Public Resources Code, Section 21151.9, and CEQA Guidelines, Section 15155, the proposed project was subject to a water supply

assessment (WSA) from the public water system identified as the water provider for the project (Padre Dam Municipal Water District (PDMWD), the criteria for which is dictated in Water Code section 10910-10915. “Projects” subject to a WSA under the Water Code are those that are of statewide, regional, or area-wide significance, such as a proposed residential development of more than 500 dwelling units (Water Code, Section 10912; CEQA Guidelines, Section 15206[b][2][a]). The WSA must discuss whether projected water supplies will meet projected water demands for the proposed project and other planned growth and describe its plans for acquiring additional water supplies if it concludes that its existing water supplies are not sufficient to serve the project. The WSA must then be included in the EIR for the proposed project under Water Code section 10911(b). When considering the proposed project, the City must independently evaluate PDMWD’s assessment in the EIR and “determine, based on the entire record, whether projected water supplies will be sufficient to satisfy the demands of the project, in addition to existing and planned future uses” (Water Code, Section 10911[c]).

In addition to these statutory requirements for a WSA, a verification of adequate water supply is required for larger residential subdivisions such as the proposed project before a final subdivision map may be recorded

(Government Code, Section 66473.7). The verification requirement must be included as a condition of approval of the tentative subdivision map, and the verification must be provided by the water supplier.

Nowhere in the detailed statutory scheme described above must the water supplier or the land use authority call into question the wisdom of allocating water to residential development such as the proposed project, nor does the comment cite to any legal authority in support of such request. Contrary to the comment, the long-term sustainability of water supplies is considered by PDMWD, San Diego County Water Authority (SDCWA), and Metropolitan Water District of Southern California (Metropolitan) in preparation of their respective Urban Water Management Plans (UWMP) considering water supplies over the next twenty years, which are updated every five years and accounted for in the WSA (Water Code, Sections 10620–10621, 10631.)

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significance of the Project’s water supply impacts. (DREIR at 4.17-10.) The two thresholds dictate analysis of whether current entitlements are sufficient to supply the Project, and if the Project would require the construction of new facilities or the expansion of existing facilities, and if such construction would have significant environmental impacts. (DREIR at 4.17-10, CEQA Guidelines Appendix G, XVIII (b), (c).) Analysis under these thresholds does not inform the public or decision-makers about the long-term sustainability of Project supplies, or how supplying this water-intensive project will affect other users reliant on finite water resources.

O6-73

The DREIR’s water supply analysis should be revised, using thresholds of significance that account for the Project’s impact on the water supply system, not simply its paper-water entitlements. While it is within the City’s discretion to use the Appendix G checklist questions in the significance determination, the checklist may “not necessarily cover all potential impacts that may result from a particular project. (*Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.4th 677, 689.) Therefore, thorough impact analysis may require the changes to the checklist questions in order to fully address all of a project’s potentially significant impacts. (*Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1111.) In light of the water supply challenges facing California and the Western United States, the DREIR should analyze whether this Project represents a wise allocation of water resources, and what its allocation would mean for other users within the system.

**B. The DREIR’s analysis of project water demand is inadequate.**

O6-74

The DREIR’s undermines the entire water supply analysis by misrepresenting the Project’s water demand. The DREIR acknowledges that the Project’s total demand will be 1,617 acre-feet per year (AFY), but then claims that since 840 AFY were “accounted for” in the SDCWA 2015 Urban Water Management Plan (UWMP) (“2015 SDCWA UWMP”) and the PDMWD 2015 UWMP, the analysis need only focus on the Project’s ability to procure 778 AFY. (DREIR at 4.17-23.) This bifurcation of the Project’s demand amounts to impermissible piecemealing of the Project’s impacts in order to minimize potential impacts. (See *East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 293 [“CEQA mandates that environmental considerations do not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences (citation)”].) The DREIR must analyze the environmental impacts of the whole Project, as currently proposed. (Guidelines § 15378.) Further, the DREIR must assess the impacts of supplying water to *this* proposed Project, and may not discount an element of the Project that was assessed in a previous CEQA process. (See

**O6-73:** This comment continues to argue that the significance thresholds from Appendix G of the CEQA Guidelines used in the EIR to address water supplies for the proposed project are insufficient. See response to comment O6-72.

**O6-74:** This comment claims the EIR’s water supply analysis is inadequate because it concludes that 840 AFY was previously accounted for in SDCWA’s UWMP and PDMWD’s UWMP; therefore the WSA evaluates the additional demand of 778 AFY associated with the proposed project that was not previously accounted for. The comment mischaracterizes the EIR and WSA (Appendix O3), which clearly states in Section 2.1 (Page 2-1), “this Assessment incorporates only the 840 AFY Project demand that is accounted for in the 2015 UWMP and will additionally determine whether the additional, updated Project water demand, beyond the 840 AFY already accounted for in the District’s UWMP, all of which is now potable demand because recycled water is not available for this Project, can be supplied by the District’s total projected available water supplies under the normal, single dry year, and multiple dry year water scenarios in addition to the District’s existing and planned future uses . . . .” (emphasis added). When the projected water demand associated with a project was accounted for in the most recently adopted UWMP, the WSA may incorporate that discussion to comply with

requirements of the WSA statute (Water Code section 10910(c)(2)). Here, a portion of the demand associated with the proposed project was accounted for in PDMWD's 2015 UWMP. That discussion was incorporated into the WSA. The WSA then provides additional analysis as to how the remainder of the proposed project's water demand will be met by PDMWD's projected supplies available during normal, single dry, and multiple dry water years during a 20-year projection, in addition to PDMWD's existing and planned future uses, including potable agricultural and manufacturing uses in compliance with Water Code section 10910(c)(3).

The WSA is included in the EIR and evaluated by the City within the same document under Water Code section 10911(b) and CEQA Guidelines section 15155(e). The analysis of water supply in an EIR may incorporate by reference the WSA as well as the information from an UWMP or other publicly available source under CEQA Guidelines section 15155(f). The information required to be included in a WSA under Water Code section 10910 may come from the public water system's UWMP, if the projected water demand associated with the proposed project was accounted for in the most recently adopted UWMP (Water Code section 10910(c)(2)). Here, both the EIR and the WSA are clear that a portion of the proposed project's water demand was previously accounted for in



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 cont.

DREIR at 4.17-23 Table 4.17-4 fn. 1; WSA at 2-1.<sup>3</sup> The 2007 study, and any other analysis supporting a previous application, is not relevant to the current application, as all approvals for previous iterations of the Fanita Ranch project were invalidated in prior litigation. (DREIR at 1-3.) The DREIR must be revised to assess the environmental impacts of supplying water to meet all demand associated with this Project.

**C. The DREIR’s analysis of available supplies to serve the project is incomplete and inadequate.**

The DREIR must assess the environmental impacts of supplying water to the Project, simply noting that its demand has been “accounted for” in previous planning documents does not meet CEQA’s requirements for environmental impact disclosure, assessment and mitigation. (See *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 434 (hereinafter “*Vineyard*”) [“The ultimate question under CEQA, moreover, is not whether an EIR establishes a likely source of water, but whether it adequately addresses the reasonably foreseeable impacts of supplying water to the project”].) The demand quantification, discussed above, presumes that supplying 840 AFY to the Project has already been analyzed, and therefore the DREIR need only assess the impacts of supplying the remaining 778 AFY. (DREIR at 4.17-23.) This approach circumvents CEQA’s requirement that the impacts of supplying the Project are fully and clearly presented for the public and decision-makers to consider.

O6-75

The DREIR’s attempt to exclude the 840 AFY from further analysis is impermissible because preparation of UWMPs is expressly exempt from CEQA. (See *Sonoma County Water Coalition v. Sonoma County Water Agency* (2010) 189 Cal.App.4th 33, 51 [citing Cal. Wat. Code § 10652].) Moreover, Water Code section 10652 expressly states that even though UWMPs are exempt from CEQA, any project that “would significantly affect water supplies for fish and wildlife, or any project for implementation of the [urban water management] plan” is *not* exempt from CEQA. The environmental consequences of supplying the 840 AFY for the Project were not previously assessed, despite the inclusion of the supply in the 2015 UWMPs’ projections, and therefore must be addressed in this DREIR. (See *Ctr. for Biological Diversity v. County of San Bernardino*, 2008 Cal. App. Unpub. LEXIS 9281 at fn. 13.) The DREIR must be revised to analyze the impacts of supplying 1,617 AFY of water to the Project.

<sup>3</sup> PDMWD’s supply planning for its 2015 UWMP was based on a prior Fanita Ranch Specific Plan and a 2007 report prepared by Boyle Engineering that concluded that project would use 840 AFY.

PDMWD’s 2015 UWMP, which allows for the incorporation of that portion of the UWMP into the water supply analysis, and then proceed to analyze the availability of water supplies for the portion that was not previously accounted-for in PDMWD’s 2015 UWMP, in compliance with CEQA and the Water Code. Thus, the EIR has properly analyzed the impact of supplying water to the *whole* proposed project, contrary to the commenter’s assertion. Moreover, as further explained in Section 2.2 of the EIR, “this EIR evaluates every potential impact area under CEQA for the proposed project and is not limited to those areas found inadequate for the project approval in 2007.”

**O6-75:** This comment continues to claim the EIR’s water supply analysis is inadequate because it concludes that 840 AFY was previously accounted for in PDMWD’s 2015 UWMP; therefore, the WSA evaluates the additional demand of 778 AFY associated with the proposed project that was not previously accounted for. See response to comment O6-74.

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1. *The DREIR fails to disclose or analyze the impacts of providing water to meet Accelerated Forecasted Growth demand.*

The DREIR concludes there will be sufficient water for the Project, but fails to analyze the impacts of providing that water. The DREIR and the Water Supply Assessment (“WSA”) conclude that supplying water to the Project will have a less than significant impact because the Project will be supplied under SDCWA’s Accelerated Forecasted Growth (“AFG”) component. (DREIR at 4.17-25; WSA at 2-5.) Nowhere in either document is there an explanation of where this water comes from, or what impact(s) will result from it being allocated to the Project. This is impermissible, since “future supplies identified and analyzed must bear a likelihood of actually proving available; speculative sources and unrealistic allocations (“paper water”) are insufficient bases for decisionmaking under CEQA.” (*Vineyard*, 40 Cal.4th 412, 432.) The WSA notes that the AFG accounts for development that was projected to occur beyond SDCWA’s planning horizon, but has the potential to move forward on an accelerated schedule. (WSA at 5-8.) But neither the DREIR nor the WSA contain an explanation of how this seemingly extra water will be supplied. Table 4.17-6 demonstrates that the AFG water is additional to what SDCWA has available for PDMWD. (DREIR at 4.17-24.) The DREIR must provide evidentiary support for the likelihood of this source actually being available, otherwise it is nothing more than “paper water” that hides the Project’s potentially significant impact on regional water supplies.

2. *Internal inconsistencies render the DREIR’s analysis inadequate.*

Internal inconsistencies regarding how potential supply shortages are addressed undermines the DREIR’s analysis of water supply impacts. This is not a new issue for analysis of the Fanita Ranch projects, as the previous water supply analysis was invalidated due in part to internal inconsistencies. (See *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th . 284 [the court the water supply analysis violated CEQA because the EIR failed to explain the discrepancy between the WSA and EIR’s demand totals, and that “such an unexplained discrepancy precludes the existence of substantial evidence to conclude sufficient water is likely to be available for the project (citations omitted)”].) This time around, the DREIR contains multiple inconsistencies that leave the reader in the dark as to the potential impacts of supplying water to the Project.

Most notable is the lack of consistency in how the DREIR and WSA describe projected supply shortages, and whether carryover storage is or is not factored into those shortages. The WSA acknowledges supply shortages as early as 2028, in a multiple dry year scenario, and 2035 in a single dry year scenario. (WSA at 2-3.) The WSA states that no shortages are anticipated, until 2028 or 2035. “provided carryover storage supplies are utilized.” (id.) This communicates to the reader that but for the use of carryover storage, the shortages would have occurred sooner,

**O6-76:** This comment claims that the EIR does not adequately analyze the impact of providing water to the proposed project under SDCWA’s Accelerated Forecasted Growth (AFG) component. To the contrary, the WSA explains that SDCWA has confirmed that it can meet the associated demand with the proposed project through the use of the AFG component of its 2015 UWMP (WSA, Pages 2-2 through 2-3 and Page 5-7). In other words, the AFG water supply is built into SDCWA’s regional water supply forecasting and is not a separate project or source of “extra” water supply that must be analyzed in the EIR for the proposed project. The WSA explains, “[t]he demand associated with the Accelerated Growth Forecast component is included in SDCWA’s regional total demand forecast and is intended to account for a portion of SANDAG’s estimated residential land use development that is currently projected to occur beyond the SDCWA’s 40 year planning horizon, but that has the potential to move forward on an accelerated schedule ” (see WSA, Page 5-8 and SDCWA’s 2015 UWMP, Page 2-6). The SDCWA 2015 UWMP (Section 2, Table 2-8, footnote 6) further states, “[d]emands associated with accelerated forecasted growth are not attributed to individual member agencies and are listed for regional planning purposes.”

**O6-77:** This comment claims the EIR contains internal consistencies as to whether carryover shortages are factored

into supply shortages. To the contrary, the EIR (Pages 4.17-23, 4.17-24, 4.17-25, and 4.17-26) and the WSA (Pages 6-3, 6-4, 6-5, and 6-6) both contain the same water supply and demand analysis, rely on the same underlying supporting documents, and state that in dry years, the proposed project would rely on carryover shortage, water conservation, and dry year transfers as set forth in SDCWA's 2015 UWMP. The EIR (Pages 4.17-24 and 4.17-25) has been revised to clarify that the water supply analysis regarding anticipated shortages incorporates the use of carryover storage, as set forth below.

As shown in Tables 4.17-4, 4.17-5, and 4.17-6, supply shortfalls are projected in the single and multiple dry year scenarios. PDMWD can address the shortfalls identified here and in its 2015 UWMP through the implementation of conservation measures identified in Section 8 of its 2015 UWMP, Water Shortage Contingency Planning (Appendix O3). The SDCWA 2015 UWMP has identified no shortages in a single dry year until 2035 and no shortages in multiple dry years until 2028, provided carryover storage supplies are utilized in both instances. Carryover storage currently totals 170,000 AFY. SDCWA maintains that single and multiple dry year shortages can be mitigated through extraordinary water conservation actions and dry year transfers, which the SDCWA successfully

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 cont. and that the shortages projected are accounting for the use of carryover storage. This directly conflicts with the DREIR, which states that “SDCWA maintains that such shortfalls can be mitigated with the use of its carryover storage capacity” among other measures. (DREIR at 4.17-24.) This inconsistency is consequential. As drought conditions intensify due to climate change, the ability of SDCWA to provide water in times of shortage will have real impacts, on both the residents of the Proposed Project, and on the environment. The DREIR must be revised to properly address how supply shortages will be mitigated, and the impacts associated with providing additional supply. (See *Vineyard*, 40 Cal.4th 412, 430-432.)

3. *The DREIR’s discussion of the East County Advanced Water Purification plan is misleading.*

06-78 The DREIR’s discussion of the potential supply that may be available through the East County Advanced Water Purification plan (“ECAWP”) is misleading to the public and decision-makers. As the DREIR notes, the ECAWP is still in development, and has not been approved, and is therefore not included in the projected water supply for the Project. (DREIR at 4.17-24.) Such speculation confuses the reader, as the lengthy discussion of the ECAWP, in both the DREIR and the WSA, gives the impression that it is likely to come on line and be a viable option for the PDMWD in the near future.

**D. The DREIR fails to properly assess the impacts of climate change on the Project’s water supply.**

06-79 The DREIR fails to adequately consider the impacts of climate change on the availability of increasingly scarce water resources in the western U.S. during the lifespan of the Project. California law requires agencies to discuss and disclose a proposed project’s long-term future water supply. (See *Vineyard*, 40 Cal.4th at 432; Water Code § 10910.) The DREIR finds the Project will have less than a significant impact on water supply related to sufficiency of water supply. (DREIR at 4.17-22.) This finding is based in part on the WSA that discusses entitlements, water rights, water service contracts, and supply projects that contribute to the supply needs of the Project. (DREIR at 4.17-22.) The WSA report does not adequately discuss climate change or the dramatic effects it will have on fresh water supplies in the arid West in the near future.

Significant for the State, as well as the Project area, is climate change’s impact on water supply. The IPCC specifically identified the American West as vulnerable, warning, “Projected warming in the western mountains by the mid-21st century is very likely to cause large decreases in snowpack, earlier snow melt, more winter rain events, increased peak winter flows and flooding, and reduced summer flows ...” (IPCC 2007b.) Recently, researchers found that an increase in atmospheric greenhouse gases has contributed to a “coming crisis in water supply for

acquired and used during the 2007–2011 shortage period. (SDCWA 2015 UWMP Section 9.3.) Further, the shortfalls identified in the SDCWA’s 2015 UWMP would be mitigated by the interim demand forecast reduction of approximately 60,000 AFY for the 2020 to 2040 planning horizon identified in the 2018 SDCWA Annual Report based on water-use efficiency increase projections throughout the region and with the increased output at the Carlsbad Desalination Plant in comparison with the SDCWA’s 2015 UWMP.

For a detailed discussion on the EIR’s analysis of water supply for the proposed project versus the 2007 project, see Section 4.17.7.

**06-78:** This comments claims the EIR’s discussion of the East County Advanced Water Purification (ECAWP) Program is misleading. To the contrary, both the EIR (Section 4.17.1.2 on Wastewater and Recycled Water) and the WSA (Pages 2-2, 3-16, and 6-2 for example) consistently explain that (1) the ECAWP Program is currently in the preliminary engineering and permitting phase, and construction is estimated to be completed in 2025; (2) if the ECAWP Program is implemented, based on this projected time frame, the proposed project would be able to fully use purified water from the ECAWP Program within the 20-year water supply planning horizon and beyond; (3) the ECAWP Program would not be necessary for PDMWD to

meet the demand associated with the proposed project but could provide an *additional supply source* for further water supply security to the proposed project and other PDMWD customers if it is implemented; and (4) the ECAWP Program is not included in the additional supply projections for the AFG component of SDCWA's 2015 UWMP (EIR, Tables 4.17-4, 4.17-5, and 4.17-6). Ignoring or dismissing the pending ECAWP Program, which is expected to produce up to 11.5 mgd to be pumped into Lake Jennings for surface water augmentation, would be inconsistent with the range of issues that a WSA should consider under Water Code section 10910 and could deprive decision makers from understanding the full picture of PDMWD's verifiable and potential water supplies. There is no legal authority supporting the commenter's request for the EIR or the WSA to provide *less* information regarding potential available supplies.

- O6-79:** This comment states the EIR fails to properly assess the impacts of climate change on the proposed project's water supply. Section 4.17.5.2 of the EIR on water supply availability states that the water demand for the proposed project "took into account the effects of climate change on water supply, including the rising sea levels and changes in weather events, details of which can be found in Section 4.7 of the EIR" on greenhouse gas emissions. Notably, Section 5.1.1 of the WSA includes a more detailed discussion of how climate change impacts water supply from

Metropolitan, which references Metropolitan's efforts to implement water conservation to reduce the amount of water imported from the State Water Project and the Colorado River (See Metropolitan's 2015 UWMP, Section 2.6, Other Supply Reliability Risks; see also SDCWA's 2015 UWMP, Sections 2.4.4, Projected Climate Change Impact on Water Demands and Section 10, Scenario 5:Climate Change; PDMWD's 2015 UWMP, Section 3.3.1, Climate Change). The analysis of water supply in an EIR may incorporate the WSA as well as information from an UWMP or other publicly available source under CEQA Guidelines section 15155(f). Nonetheless, additional discussion of the manner in which climate change was factored into water supply analysis for the proposed project has been added to Section 4.17.5.2 of the EIR in response to the comment, as follows:

The effects of climate change drastically alter the overall planning required for the conservation and distribution of Metropolitan's water supply. Accounting for the effects of climate change is a challenging task because the events that can occur are unpredictable. However, previous hydraulic studies produced by Metropolitan have provided a strong basis for the prediction of future events. According to Metropolitan's UWMP, the predicted impacts of global climate change that could affect Metropolitan's water supply include, but are not limited to: (1) reduction in the average annual snowpack; (2)

changes in the timing, intensity, and location of weather events; (3) rising sea levels; (4) decrease in local sources such as groundwater; (5) increase in urban and agricultural water demand; (6) degrading water source; (7) declines in ecosystem viability; and (8) changes to pumping and power operations.

To prevent further greenhouse gases, Metropolitan has implemented steps to reduce the carbon footprint of its facilities, including the addition of hydroelectric power plants that create energy from the water flowing through pipelines, and implementation of solar power technologies to its facilities. Metropolitan not only audits its own energy usage but also voluntarily reports its greenhouse gas emissions to California's Climate Registry.

Metropolitan has taken steps to offset the effects of climate change on water supply. To reduce the water impacts due to climate change, Metropolitan has developed and implemented drought response action items. According to "Current Conditions" section of the Metropolitan 2015 UWMP, Metropolitan's drought response actions include providing incentives for on-site recycled water hook ups; augmenting water supplies with water transfers and exchange; improving storage programs; upgrading its distribution system to enhance CRA water delivery; and implementing the Water Supply Allocation Plan

to distribute the limited imported supplies and preserve storage reserves.

The conservation method allows for a reduction in energy that normally would have been used by exporting water instead of storing it. With the use of gravitational distribution for recycled water, less electricity is required to generate energy needed to distribute pressurized water. Efforts to implement water conservation include recycling and reusing sea water and wastewater as a reliable source of potable water. Applying such measures reduces the amount of water imported from the SWP and the Colorado River.

Likewise, SDCWA has developed strategies to manage the supply uncertainties associated with a changing climate. This includes the foundational strategy to diversify the region's resource mix through development of local projects, such as recycled water and seawater desalination and reduce reliance on imported and local surface supplies whose yields could potentially decrease as a result of climate change (see tables 10-3 and 10-4 of the SDCWA 2015 UWMP). SDCWA uses tracking metrics to monitor the progress on implementation of its water resource mix, which are then used in updates to its UWMP every five years.



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the western United States . . . ." (Barnett 2008.) Using several climate models and comparing the results, the researchers found that "warmer temperatures accompany" decreases in snow pack and precipitation and the timing of runoff, impacting river flow and water levels. (Barnett 2008.) These researchers concluded with high confidence that up to 60 percent of the "climate related trends of river flow, winter air temperature and snow pack between 1950-1999" are human induced. (Barnett 2008.) This, the researchers wrote, is "not good news for those living in the western United States." (Barnett 2008.)

O6-79  
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The California Center on Climate Change has also recognized the problem climate change presents to the state's water supply and predicts that if GHG emissions continue under the business-as-usual scenario, snowpack could decline up to 70-90 percent, affecting winter recreation, water supply and natural ecosystems. (Cayan 2007.) Climate change will affect snowpack and precipitation levels, and California will face significant impacts, as its ecosystems depend upon relatively constant precipitation levels and water resources are already under strain. (Cayan 2007.) The decrease in snowpack in the Sierra Nevada will lead to a decrease in California's already "over-stretched" water supplies. (Cayan 2007.) It could also potentially reduce hydropower and lead to the loss of winter recreation. (Cayan 2007.) All of this means "major changes" in water management and allocation will have to be made. (Cayan 2007.) Thus, climate change may directly affect the ability to supply clean, affordable water to the residents, or change how the Project will utilize water, and it may also impact other activities outside the Project area, such as agriculture or offsite residential use.

**E. The DREIR and supporting documents fail to consider events that are likely to limit Metropolitan Water District's supply capabilities.**

O6-80

The DREIR should be revised to address the recently-approved Lower Basin Drought Contingency Plan ("LBDCP"), a compact among purveyors of Colorado River water in Arizona, Nevada and California, and how MWD's participation therein will impact regional water supplies. (MWD 2019e.) In the event of drought conditions that result in the water level of Lake Mead dropping below specified elevations, California holders of Colorado River water rights will be responsible for curtailing how much water they receive during the 9-year duration of the LBDCP. (MWD 2019a at 1.) If the elevation of Lake Mead drops below 1,035 feet, California will be responsible for contributing 350,000 AF of water annually. MWD 2019b at 5.) MWD will be responsible for 85% of this contribution, up to 297,500 AF annually, since Coachella Valley Water District ("CVWD") is responsible for 7% of California's LBDCP contribution (MWD 2019c at 2), and Palo Verde Irrigation District ("PVID") is responsible for 8% of California's contribution under the LBDCP (MWD 2019d at 1). The MWD member agencies voted to approve the LBDCP on 3/12/2019 (MWD 2019f at 6), including authorization to allow MWD to cover the California contributions should other entities decide not to participate in the

**O6-80:** The comment states that the 2019 Federal Legislation and agreements among Arizona, Nevada, MWD and certain other California Colorado River right holders implementing a Lower Basin Drought Contingency Plan (LBDCP) has increased the risk and decreased the supply reliability of water that MWD supplies to SDCWA. The comment also faults the EIR for failing to discuss the LBDCP and analyze what the comment describes as a significant decrease in available MWD supply due to the LBDCP negatively impacting MWD's ability to deliver water to SDCWA.

The Notice of Preparation (NOP) for the EIR was issued in November 2018, and preparation of the EIR has been ongoing since that time. The LBDCP Federal Legislation and agreements referenced in the comment all occurred well after the NOP date. Although negotiations for the LBDCP began in 2016 (postdating all the 2015 UWMPs) referenced in the water supply analysis in the EIR, and in the WSA prepared by PDMWD for the proposed project), the LBDCP did not come to fruition until late Spring 2019. The Colorado River Drought Contingency Plan Authorization Act was passed by Congress and signed into law in April 2019<sup>1</sup>. The contracts creating the "voluntary" agreements among the Lower Colorado Basin entities and the

<sup>1</sup> Public Law 116-14-Apr. 16, 2019.

Department of the Interior, including MWD's Drought Contingency Plan (DCP) agreement,<sup>2</sup> were executed in May 2019<sup>3</sup>. The City does not agree that an EIR process that is already underway must reflect new developments in water supply matters that arise after the NOP date.

The City also observes that the comment's statement that the 2015 MWD UWMP and the 2015 SDCWA UWMP do not reflect the LBDCP, while true, is nonsensical. Those plans were adopted in 2016; the LBDCP legislation and agreements were adopted in 2019.

Nonetheless, the commenter's suggestion that such an analysis of the LBDCP would identify a new and increased risk after 2015 to MWD Colorado River supplies and to SDCWA supplies from MWD is incorrect. Rather than increasing the risk to those supplies, the LBDCP improves the reliability of Colorado River supplies available to MWD.

The Colorado River has historically flowed in widely varying volumes, with episodic periods of floods and droughts. This history is the predicate for the construction of Hoover Dam, Glen Canyon Dam and many other storage and regulatory projects in the Colorado River watershed. As noted in the WSA, by the

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<sup>2</sup> The LBDCP agreements involving MWD as a signatory are comprised of a May 20, 2019 Agreement Concerning Colorado River Drought Contingency Management and Operations, a May 20, 2019 Lower Basin Drought Contingency Plan Agreement with exhibits, and other individual agreements with specific other California Colorado River water right holders.

<sup>3</sup> May 20, 2019 Bureau of Reclamation Press Release.

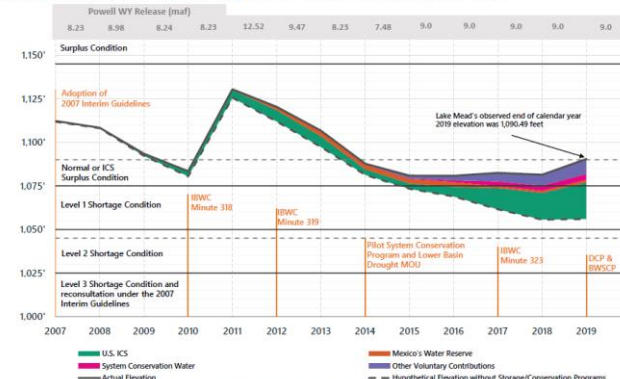
end of 2007, the Department of Interior had adopted an additional regulatory program known as the 2007 Interim Guidelines. The Interim Guidelines identified both shortage conditions and surplus conditions based on Lake Mead elevations, and provided for prescribed and allowed actions, with an expiration of the Interim Guidelines on December 31, 2026.<sup>4</sup> The Interim Guidelines allowed conserved water labelled Intentionally Created Surplus (ICS) to be stored in Lake Mead and withdrawn when Lake Mead's elevation is above 1,075. In a February 2019 Federal Register Notice, the Bureau of Reclamation (BOR) noted that notwithstanding the Interim Guidelines, “the risk of reaching critically low elevations at Lakes Powell and Mead has increased nearly fourfold,” but also noted that adoption of consensus-based DCPs in early 2019 would appropriately and promptly reduce the risk facing the Colorado River Basin.<sup>5</sup> And, that has occurred.

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<sup>4</sup> BOR Review of Interim Guidelines, p 8.

<sup>5</sup> BOR February 6, 2019 Federal Register Notice.

Summary of Lake Mead Storage and Conservation 2007-2019



18 End of calendar year 2019 balances of U.S. ICS and Mexico's Water Reserve, system conservation water, and other voluntary contributions to Lake Mead are provisional and subject to change.

MWD's and other's 2019 DCP agreements prevented short-term risk from materializing, and reduced medium and long-term risk. Lake Mead was at elevation 1,078 in December 2018.<sup>6</sup> The BOR projected that Lake Mead might fall below the shortage threshold of 1,075 in 2019, which if it occurred, would have cut off MWD's access to almost 600,000 af of water stored in Lake Mead under the Interim Guidelines<sup>7</sup>. As a result of the LBDCP, more water can be stored in Lake Mead, MWD has access to stored water down to elevation 1,025, and the probability of Lake Mead elevation dropping below 1,075 or lower was significantly *reduced*. Since its implementation, the LBDCP has proved effective and Lake Mead has reached its highest level in years due to increased storage<sup>8</sup>. Lake Mead's elevation has increased nearly 7.5

<sup>6</sup> December 11, 2018 MWD Board of Directors meeting, Board Action memo 8-11 from the Water Planning and Stewardship Committee, page 2.

<sup>7</sup> Id.

<sup>8</sup> MWD Statement on Colorado River Reservoir conditions, August 15, 2019.

feet between April 2019 and April 2020, despite the continuing drought.<sup>9</sup> Further, the BOR has determined there is a 0 percent chance of Lake Mead dropping below 1,045 (the trigger point for MWD's LBDCP contributions) through 2022 and less than a 1 percent chance in 2023 and 2 percent chance in 2024.<sup>10</sup>

In sum, although the risk of drought on the Colorado River has and will continue to exist, management of that risk via the LBDCP has increased the reliability of MWD supplies, not increased the risk as suggested by the comment.<sup>11</sup>

Further, SDCWA's reliance on MWD as a source of its supplies has been significantly reduced, and its reliance on other, even more reliable supplies has increased significantly since SDCWA's 2015 UWMP. The 2020 UWMP is currently in development and won't be available until mid-2021. But certain data and projections about SDCWA supplies are now available. In connection with the 2020 UWMP effort, the SDCWA Water Planning and Environmental Committee made available to the public a detailed presentation from January 23, 2020 entitled Long-Range Demand Forecast and 2020 Urban Water Management Plan Update. Page

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<sup>9</sup> BOR Lake Mead at Hoover Dam, End of Month Elevations.

<sup>10</sup> BOR Colorado River System 5-Year Projected Future Conditions.

<sup>11</sup> Note that the comment also references litigation commenced by the Imperial Irrigation District (IID) against MWD alleging improper CEQA review of MWD's LBDCP agreement. When a final decision, after any appellate review, will occur, what the outcome will be, and whether that outcome would interrupt LBDCP participation of all, some, MWD only, or none

101 of this presentation reflects the increase in the supply available to SDCWA under the IID 2003 Conserved Water Transfer Agreement of more than 100,000 afy to a stabilized 200,000 afy through 2047. This supply, plus the 77,700 afy from the All American Canal and Coachella Canal lining projects are significantly more impervious to Colorado River conditions than MWD's water rights that are the focus of the comment. IID has a Colorado River right to 3.1 million afy, all of which is senior to all of MWD's rights.<sup>12</sup> And, should IID's right be curtailed by a shortage condition, until that curtailment equals 500,000 afy, the cutback is shared with the SDCWA Conserved Water transfer volume of 200,000 afy on a pro rata basis.<sup>13</sup> Thus, even if IID had a cutback of 100,000 afy, SDCWA would lose less than 6,500 afy of the 200,000 Conserved Water transfer volume (100,000 divided by 3,100,000 times 200,000 equals 6,451.)

At the same time that SDCWA grew the volume of a more reliable supply from IID after 2015, the reliance on MWD supplies declined substantially. As can be seen below from page 14 of the October 2018 SDCWA Business Plan, the percentage of supply to SDCWA

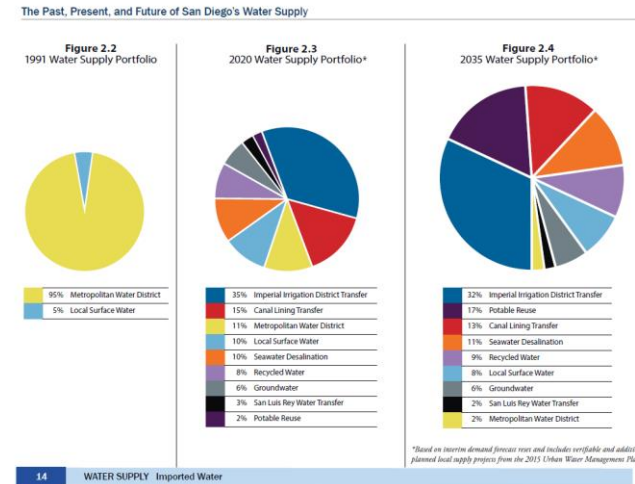
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of those with LBDCP agreements is unknown and speculative, and thus whether and when such litigation might have any impact on MWD Colorado River supplies is also unknown and speculative.

<sup>12</sup> MWD November 6, 2018 Board Presentation, Slide 2.

<sup>13</sup> April 29, 1998 Agreement for Transfer of Conserved Water between IID and SDCWA, section 11.1, p 52.

from MWD has declined from 95 percent in 1991 to a projected 11 percent in 2020 and 2 percent in 2035.



Thus, SDCWA has a declining risk of supply disruption by cutbacks to MWD arising from a Colorado River shortage. When this reduced reliance on MWD supplies is coupled with the fact that the effect of the LBDCP is to improve, not reduce, the reliability to MWD's Colorado River supplies, the commenter's assertions about the adverse impact of the LBDCP are misplaced. Indeed, the recent developments since issuance of the NOP for this EIR show less risk and a more robust water supply availability for the proposed project from SDCWA.

Please also refer to the Section 4.17, Utilities and Service Systems, and the WSA for further discussion of water

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supply, including uncertainties due to climate change, drought and other factors, water shortage contingency analysis and planning, drought management plans, water supply allocation plans, and potential alternative sources of supply for the proposed project.

LBDCP (MWD 2019a at 1). Authorization to participate in the LBDCP on behalf of California will result in MWD assuming responsibility for the contribution originally to be made by Imperial Irrigation District (“IID”), which conditioned its approval of the LBDCP on events that MWD viewed as unlikely to occur. (MWD 2019a at 1.) Following MWD’s agreement to contribute the 250,000 AF of water that IID would have been responsible for, IID has filed suit against MWD and the other signatories of the LBDCP alleging that participation in the LBDCP requires analysis under CEQA. (Verified Petition for Writ of Mandate, *IID v. MWD*, 4/16/19 [the “Petition”].) The Petition highlights the potential impacts to regional water supplies if MWD must forego deliveries of up to 2,082,500 AF of Colorado River water over the duration of the LBDCP. (Petition at 10.) IID argues that MWD wrongly determined that approving the agreement is exempt from CEQA review, claiming there are potentially significant impacts associated with replacing the water that must remain in Lake Mead. (Petition at 11.)

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 cont.


The DREIR must provide analysis of how MWD will continue to provide imports to SDCWA, particularly in dry years when the LBDCP would foreseeably be activated. SDCWA anticipates receiving approximately 39% (over 260,000 AF) of its single dry water year supply from MWD in 2020 and 2025. (2015 SDCWA UWMP at 9-3.) SDCWA is aware of the LBDCP, and acknowledges that SDCWA “is in a unique position to contribute substantially to raise Lake Mead elevation with its Intentionally Created Surplus (ICS)-qualified water, paid for solely by Water Authority ratepayers.” (SDCWA 2019.) However, the LBDCP is not discussed in the DREIR, nor is it mentioned in any of the water supply planning documents referenced by the DREIR, such as the SDCWA 2015 UWMP, or the MWD 2015 UWMP. The verification of a water supply for a given project must be supported by substantial evidence; this evidence can include a recently approved UWMP. (Cal. Gov’t Code § 66473.7(c)(1).) The lack of analysis of the regional impacts the LBDCP on MWD’s ability to deliver water to SDCWA and other customers undermines the validity of water supply assessments that rely of MWD imports. Such a significant decrease in available MWD supply should be addressed, and potential replacement supplies should be designated, and the associated impacts should be disclosed and analyzed.



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Thank you for your consideration of these comments. Please provide us with any notices regarding the Project and the REIR.



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Exhibits (2)  
Reference materials provided in separate mailing

**O6-81:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## EXHIBIT 1

**From:** [Wouffe, MaryBeth](#)  
**To:** [Roberts, Carol](#)  
**Cc:** [Avery, Jon](#); [Sobiesch, Scott](#); [Snyder, Jonathan](#); [Winchell, Clark](#)  
**Subject:** Re: [EXTERNAL] RE: Follow up on Tuesday's meeting on December 17 2019  
**Date:** Monday, December 30, 2019 8:27:19 AM  
**Attachments:** [image.png](#)  
[image.png](#)  
**Importance:** High

Good morning -

I agree with Carol's points...The Plan that has been submitted falls short of all of the section 10 issuance criteria. We continue to ask for information regarding baseline etc. that has not been provided. There are sections of the Plan that have not been completed. Despite the Plan's rough shape, we dutiful have upheld our commitments to provide overview comments and specific comments via track change (some rewrites) to the Plan. These efforts have been hugely time-consuming. This stage of the process often takes months/years. Dave and I have been working on RPV and V14 concurrently. We explained at the onset of our review that we all have other commitments that we are working on concurrently. I think Melanie's assessment of our slow review is not accurate. Truly, some of the Chapter's take days to review because the language is unclear (to the consultant as well) and needs extensive comments and edits. If they are truly seeking a section 7, and won't complete the Plan - that would be time wasted on our part. Based on the City's and Fanita's track record, I think there is a strong possibility that our comments/review will likely not result in meaningful changes to meet issuance criteria and that they will just move forward and finalize the Plan for submittal.

Let convene next week, if possible.

Thanks, Mary Beth

On Fri, Dec 27, 2019 at 12:28 PM Roberts, Carol <[carol\\_a\\_roberts@fws.gov](mailto:carol_a_roberts@fws.gov)> wrote:

Well, I would say that I got the important details right, as the changes the Melanie provided did not refute that we:

- 1) are not welcome to suggest changes to the Fanita Ranch project footprint though the Santee Subarea Plan discussions,
- 2) would have to/are expected to submit any changes to said footprint that we recommend as needed for permit issuance through the project CEQA process,
- 3) would need to submit those comments during the public comment period just like everyone else, and
- 4) made it clear that the Subarea Plan will not have our approval prior to the City's consideration of the Fanita Ranch project.

As I see it, we have two potential paths forward. Either we engage more fully with a "full court press" to develop our specific rebuttals to the footprint relative to our issuance criteria as comments to be provided during the public comment period, and we dedicate more staff time to getting through the Subarea Plan in a more efficient/effective fashion. Or we decline to continue to work on the Subarea Plan pending the City's process and the project's supposed federal nexus for section 7, relying on the existing record of our

**O6-82:** The comment is an internal email, dated December 30, 2019, from the USFWS regarding the City's Draft MSCP Subarea Plan. The comment states the Draft MSCP Subarea Plan (as of December 2019) did not meet all of the requirements for Section 10 permit issuance and notes that USFWS has dutifully reviewed and revised the Draft MSCP Subarea Plan. The comment speculates on the City's commitment to implement revisions and address comments on the Draft Subarea Plan prepared by the USFWS. The comment pre-dates the release of the EIR and, therefore, does not raise a comment on the adequacy of the analysis contained therein. Further, take authorization is beyond the scope of CEQA. The issue of "take" falls under the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA) and is governed by rules and standards different from those in CEQA. Please refer to Thematic Response – Draft MSCP Subarea Plan for further responsive information.



**O6-83:** The comment is an internal email, dated December 27, 2019, between the USFWS regarding the City's Draft MSCP Subarea Plan and the proposed project (Comment 84, below). The email discusses the process through which USFWS was requested to provide feedback to the City of Santee on the proposed project's development footprint and the status of the Draft MSCP Subarea Plan review relative to the proposed project's schedule for

hearings. The comment suggests two potential approaches for how the USFWS engage in ongoing coordination with the City for providing Take coverage (i.e., either through the completion of the MSCP Subarea Plan or through the “supposed federal nexus for section 7”). The comment pre-dates the release of the EIR and; therefore, does not raise a comment on the adequacy of the analysis contained therein. Further, the issue of “take” falls under the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA) and is governed by rules and standards different from those in CEQA. Please refer to Response to Comment Letter (USFWS) as well as Thematic Response – Draft MSCP Subarea Plan for further responsive information.

O6-83  
cont.

concerns for the Fanita project and the larger Subarea Plan to capture our position, and wait and see what happens. The City is clearly pointing the finger at us for the slow progress on Plan review, which I would not deny, but I would say that they have not been forthcoming with responses to **any** of our requests to date either. Believe me, I would love it if the review could go faster, but there are so many issues, and the three of us (MB, Jon and I) all have other responsibilities.

I find a certain appeal to the wait and see approach, but I did agree to work on this lousy plan and am still committed (or should I say should be committed?) to seeing it through. The approach we take does have rather large workload implications, so I think a discussion is in order on where this fits, or doesn't, in the mix.

I am going to be out Dec 30 thru Jan 1 for my birthday/New Year's celebration (which will likely involve some red wine , finishing Season 8 of GoT  , and maybe the new Star Wars flick  ), but I will be back on January 2 ready to forge ahead for the cause.  
Thanks,

-Carol

\*\*\*\*\*  
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*-Doing all due diligence to avoid adverse effects of otherwise good intentions*

----- Forwarded message -----

From: **Melanie Kush** <[MKush@cityofsanteeca.gov](mailto:MKush@cityofsanteeca.gov)>  
Date: Fri, Dec 27, 2019 at 10:18 AM  
Subject: [EXTERNAL] RE: Follow up on Tuesday's meeting on December 17 2019  
To: Roberts, Carol <[carol\\_a\\_roberts@fws.gov](mailto:carol_a_roberts@fws.gov)>  
Cc: David Mayer (<[David.Mayer@wildlife.ca.gov](mailto:David.Mayer@wildlife.ca.gov)> <[David.Mayer@wildlife.ca.gov](mailto:David.Mayer@wildlife.ca.gov)>), Stepek, Melissa@Wildlife <[Melissa.Steppek@wildlife.ca.gov](mailto:Melissa.Steppek@wildlife.ca.gov)>, Sobiech, Scott <[scott\\_sobiech@fws.gov](mailto:scott_sobiech@fws.gov)>, Marni Borg <[mborg@cityofsanteeca.gov](mailto:mborg@cityofsanteeca.gov)>



O6-84

Carol and team – thank you for taking the time to compose your e-mail following our meeting on December 17, 2019. Revisions have been made for accuracy in some places and to provide the City's perspective in others, shown in red below:

+ We discussed the Fanita Ranch project schedule, and the City's plan is to have a Draft Environmental Impact Report (DEIR) out to the public in February. This would then be followed by a 45-day public comment period.

+ Per your comments, during the 45-day public comment period on the Fanita Ranch project DEIR would be the time that the Wildlife Agencies would be expected to provide comments and feedback on the project, and we can anticipate that the project footprint provided in that document as the proposed project will be the same as that included in the December 2018 Draft Santee Subarea Plan document provided to the Wildlife Agencies for review and comment.

+ The City of Santee currently anticipates that the City Council will make a decision whether to approve or deny the project after evaluating all public comments, which will likely be in May. If the City Council decides to approve the project, it is expected that the EIR will be certified and all associated City permits for the Fanita Ranch project will be issued shortly after that May meeting, after the comment period, likely in April or May. It was acknowledged that the Subarea Plan will not have been completed in that time frame and is subject to change until completed approved, if necessary to meet permit issuance criteria.

+ We understand that if City approvals are obtained by the Fanita Ranch project, our review and opportunity to make changes to the Fanita Ranch project proposed under the Subarea Plan to meet section 10 issuance criteria as we discussed would be limited only to the trails and any mitigation measures that are proposed within the preserve area and not to the proposed development footprint and associated amenities.

+ The Fanita Ranch applicants indicated that if local approvals are obtained, they intend to seek a take exemption for listed species through the Endangered Species Act (ESA) section 7 process under the auspices of an Army Corps of Engineers Clean Water Act section 404 permit.

+ The City would like to continue to work on the Subarea Plan with the Fanita Ranch subunit included. At a minimum, it is anticipated that the preserve lands within the Fanita Ranch project would come under the umbrella of the Subarea Plan once complete for management and monitoring (which would be the limit of section 10 permitting for the Fanita Ranch project). However, the Fanita Ranch representatives and the City's outside ESA attorney expressed interest in the possibility of subsuming the project into the Subarea Plan once the Plan is finalized so that the project may receive coverage for additional species and the assurances that go with a section 10 permit. Service staff indicated concerns about the feasibility of this approach. This warrants further discussion.

+ If the Fanita Ranch project proceeds with no ESA action other than section 7, which the City believes would only occur if there is substantial delay in reviewing and approving the Subarea Plan, the City is unlikely to pursue the Subarea Plan and section 10 incidental take permit given the limited take authorization (i.e., limited acreage) associated with what is left under the City's jurisdiction. From our perspective, this begs the question whether it is prudent to continue to move forward on the Subarea Plan and the Wildlife Agencies' review if the project is moving forward under section 7, as the work involved is very different with these approaches. The City's perspective is that species conservation would be much greater if the parties work hard to

**O6-84:** The comment is an email from the City of Santee to the USFWS, dated December 27, 2019, responding to USFWS's request for the City's clarification to several items discussed at a December 17, 2019 meeting between the agencies (see comment O6-85). The comment pre-dates the release of the EIR and; therefore, does not raise a comment on the adequacy of the analysis contained therein. No further response is required or necessary.

The email includes the following:

- The City of Santee confirmed the EIR would be released in February, following by a 45-day public review period. It is noted the EIR was released in May.
- The City confirmed the 45-day public review period was the appropriate time to provide feedback on the proposed project, and that the project as proposed was the same footprint that the agencies previously reviewed in the last Draft of the Santee Subarea Plan (December 2018). Please refer to USFWS response to comment F1-2.
- The City confirmed the expected hearing schedule for the proposed project and acknowledged that the anticipated hearing schedule would pre-date completion of the Draft MSCP Subareas Plan, and that the Draft MSCP Subarea Plan would remain subject to change if

necessary to meet permit issuance criteria. It is noted that the issue of “take” falls under the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA) and is governed by rules and standards different from those in CEQA. Please refer to Thematic Response – Draft MSCP Subarea Plan for further responsive information.

- The agencies stated it was their understanding that if the City approved the proposed project, the only opportunities for the agencies to review and make changes under the MSCP Subarea Plan would be to trails and mitigation measures required by the EIR that occur in the Habitat Preserve and not to the project’s development footprint. Please refer to USFWS response to comment F1-2 as well as Thematic Response – Draft MSCP Subarea Plan for further responsive information.
- The City confirmed its commitment to working through the Draft MSCP Subarea Plan with the Fanita Ranch subunit because, at a minimum, the City anticipated the Habitat Preserve being included in the Subarea Plan preserve. The City acknowledged the need for future discussion regarding the potential of subsuming the proposed project into the MSCP Subarea Plan at a future date to provide for additional take and

O6-84 cont.

complete the Subarea Plan review and approval in a timely manner rather than default to project-by-project permitting. The San Diego Subregional HCP is a shining star in the wildlife agencies' regional species conservation program and completion of the final Subarea Plan under that HCP should be a priority. The City has worked diligently and in good faith both at the beginning of this program in the '90s and now and should be entitled to obtain a Subarea Plan by meeting the requirements of the Subregional HCP so that there would be a consistent and efficient process for addressing species conservation and regulatory compliance within all areas of the City's jurisdiction. The Service summed it up well at last meeting by stating that "time is of the essence." The only reason we are having a discussion about Fanita Ranch moving ahead of the Subarea Plan is because of the unanticipated slow review by the wildlife agencies of the draft Subarea Plan that was submitted a full year ago in December of 2018.

Respectfully,  
 Melanie Kush  
 Director of Development Services  
 City of Santee  
 (619) 258-4100, extension 167

**From:** Roberts, Carol <carol\_a\_roberts@fws.gov>  
**Sent:** Thursday, December 19, 2019 12:04 PM  
**To:** Melanie Kush <MKush@CityofSanteeCa.gov>  
**Cc:** David Mayer (David.Mayer@wildlife.ca.gov) <David.Mayer@wildlife.ca.gov>; Stepek, Melissa@Wildlife <Melissa.Stepek@wildlife.ca.gov>; Sobiech, Scott <scott\_sobiech@fws.gov>  
**Subject:** Follow up on Tuesday's meeting

Dear Melanie,

Tuesday's meeting was very enlightening for us, and it raised several issues that will require internal discussions in developing a path forward for us. In preparation for embarking on those discussions, I want to make sure that I have my facts correct. If you could please confirm or clarify, as appropriate, the following information we took away from Tuesday's meeting, that would be greatly appreciated!

+ We discussed the Fanita Ranch project schedule, and the City's plan is to have a Draft Environmental Impact Report (DEIR) out to the public in February. This would then be followed by a 45-day public comment period.

+ Per your comments, during the 45-day public comment period on the Fanita Ranch project DEIR would be the time that the Wildlife Agencies would be expected to provide comments and feedback on the project, and we can anticipate that the project footprint provided in that document will be the same as that included in the December 2018 Draft Santee Subarea Plan

O6-85

- protections under a Section 10 permit provided by the approved Subarea Plan.
- The City confirmed in the unlikely event that the Draft MSCP Subarea Plan is delayed, the proposed project could proceed with a Section 7 permit. Under this scenario, the City would be unlikely to complete the Draft MSCP Subarea Plan and Section 10 permit due to the limited acreage associated with take authorization for other parts of the City. The City's opinion is that conservation would be improved under a completed Subarea Plan that is consistent with the requirements for Subregional HCPs.

**O6-85:** The comment is an email from USFWS to the City of Santee dated December 19, 2019, which is a follow up to a December 17, 2019 meeting between the agencies. The email requests the City's clarification of several items discussed at that meeting. The email forms the basis for the response referred to above in response to comment O6-84, as well as the subsequent internal emails between USFWS (Comments O6-82 and O6-83). Please refer to response to comment O6-84. The comment pre-dates the release of the EIR; therefore, it does not raise a comment on the adequacy of the analysis contained therein. No further response is required or necessary.

O6-85  
cont.

document provided to the Wildlife Agencies for review and comment.

+ The City of Santee currently anticipates that the EIR will be certified and all associated City permits for the Fanita Ranch project will be issued after the comment period, likely in April or May, acknowledging that the Subarea Plan will not have been completed in that time frame and is subject to change until completed.

+ We understand that our review and opportunity to make changes to the Fanita Ranch project proposed under the Subarea Plan to meet section 10 issuance criteria as we discussed would be limited only to the trails and any mitigation measures that are proposed within the preserve area and not to the proposed development footprint and associated amenities.

+ The Fanita Ranch applicants intend to seek a take exemption for listed species through the Endangered Species Act (ESA) section 7 process under the auspices of an Army Corps of Engineers Clean Water Act section 404 permit.

+ The City would like to continue to work on the Subarea Plan anticipating that the preserve lands within the Fanita Ranch project would come under the umbrella of the Subarea Plan once complete for management and monitoring (which would be the limit of section 10 permitting for the Fanita Ranch project). However, the Fanita Ranch representatives and the City's attorney expressed interest in the possibility of subsuming the project into the Subarea Plan once the Plan is finalized so that the project may receive coverage for additional species and the assurances that go with a section 10 permit. Service staff indicated concerns about the feasibility of this approach.

+ If the Fanita Ranch project proceeds with no ESA action other than section 7, the City is unlikely to pursue the Subarea Plan and section 10 incidental take permit given the limited take authorization (i.e., limited acreage) associated with what is left under the City's jurisdiction. From our perspective, this begs the question whether it is prudent to continue to move forward on the Subarea Plan and the Wildlife Agencies' review if the project is moving forward under section 7, as the work involved is very different with these approaches.

Please let me know if I have gotten anything wrong from your perspective. I would be happy to discuss any differences so that we can proceed with our internal discussions on the issues in a timely manner.

*-Carol*

\*\*\*\*\*

Carol A Roberts, Division Chief

Environmental Contaminants/Federal Projects

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*-Doing all due diligence to avoid adverse effects of otherwise good intentions*

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Thanks, Mary Beth

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Fish and Wildlife Biologist  
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## EXHIBIT 2



CENTER for BIOLOGICAL DIVERSITY

*Because life is good.*

November 13, 2018

*Via Electronic Mail and Hand Delivery (with references)*

San Diego County Board of Supervisors  
Attn: David Hall  
Clerk of the Board of Supervisors  
1600 Pacific Highway, Room 335  
San Diego, CA 92101  
[David.hall@sdcounty.ca.gov](mailto:David.hall@sdcounty.ca.gov)

**Re: Wildfire Impacts of Poorly-planned Development in San Diego County**

Dear Supervisors:

These comments are submitted on behalf of the Center for Biological Diversity (Center) regarding the approval or pending approval of the following Projects:

1. Warner Ranch
2. Lilac Hills
3. Newland Sierra
4. Valiano
5. Harmony Grove Village South
6. Otay Ranch Village 14, 16, 19
7. Otay Ranch Village 13
8. Otay 250 Sunroad
9. Project Specific Requests (PSRs)

While the Center has many concerns regarding the environmental impacts and inadequate analyses provided in the Environmental Impact Reports of the proposed Projects, the purpose of this letter is to voice our concern regarding the public safety impacts of these poorly-planned, sprawl developments in fire-prone chaparral ecosystems in San Diego County. The Center reviewed the Environmental Impact Report of each Project to determine the cumulative impacts of these developments on wildfire risk and analyze the adequacy of proposed mitigation measures. Project footprints were compared to the fire history and fire threat of the region, as identified by state agencies (the Department of Forestry and Fire Protection [Cal Fire] and the California Public Utilities Commission [CPUC]), and the total number of housing units and potential residents for all the developments were calculated.

The proposed developments would be placed in natural landscapes dominated by fire-prone native chaparral and coastal sage scrub habitats that rely on wildfires to persist. Exurban developments like those proposed – with low to intermediate housing densities extending into chaparral and scrublands – have been shown to lead to frequent human-caused ignitions and fire

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frequencies that exceed historical, natural levels in Southern California (Syphard et al. 2018). When fires occur too frequently, chaparral and sage scrub ecosystems are replaced by highly flammable non-native grasses, ultimately eliminating native habitats and increasing fire risks to communities.

By approving these sprawl Projects, the County will allow for the construction of almost 15,000 homes in natural areas dominated by chaparral and sage scrub habitat that regularly experience fire. The U.S. Census Bureau estimates that there are 2.87 persons per household in San Diego County, so together the developments would put more than 40,000 potential residents at risk. Placing more than 40,000 potential residents in fire-prone natural areas that are anticipated to burn without thoroughly considering the severe environmental, health, social, and economic consequences or requiring appropriate, science-based analyses regarding wildfire risk is reckless and a dereliction of your duty to the public. The developments will increase wildfire risks that could cause residents to lose their homes and the lives of loved ones and first responders. The increased fire risk could also worsen public health, destroy native ecosystems, and reduce biodiversity. These poorly-planned developments are not a solution to current housing needs; they will only lead to increased risk of harm and expenses for the County's residents.

Wildland fires are inevitable, natural processes in Southern California that are necessary and beneficial for chaparral and scrub ecosystems. The Center urges the County to protect human lives, property, and native biodiversity, by reforming growth strategies to focus on avoiding the placement of developments in high fire threat areas. Existing homes in fire-risk areas should be incentivized to complete retrofits with fire-resistant construction, appropriate defensible space, and homeowner fire safety education. Urban planning and design should focus on infill development in urban core areas, where wildfire threat is lower and people have access to jobs, public transit, and community. We can no longer dismiss California's natural fire regime and the direct relationship between urban sprawl and deadly wildfires. The County needs to stop approving development in high wildfire threat areas to keep its residents healthy and safe and to protect native biodiversity.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1 million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life in Southern California, including San Diego County.

#### **I. Developments in Fire-prone Natural Areas That Have Historically Burned Have the Highest Chances of Burning**

Approving these Projects will allow for the construction of almost 15,000 homes in areas that Cal Fire has identified as having extreme fire threat to people and the CPUC has determined to have elevated and/or extreme fire threat. Almost all the proposed Projects are located in or adjacent to natural areas that have evolved with fire historically and have burned multiple times in the last 140 years. In fact, 20 fires have burned in areas of the Otay Ranch Villages since

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1910, with the most recent and largest fire in the area occurring in 2007 (the Harris 2 Fire, ~91,000 acres burned).

Between the years 2000 and 2011, nearly 1,000 homes per year were destroyed by wildfires in Southern California (Syphard et al. 2012), and those numbers appear to be rising, considering last year's fires burned over 10,000 structures and this year's Camp Fire in Butte County and Woolsey Fire in Ventura County have destroyed almost 7,000 homes. Multiple studies indicate that developments with low/intermediate-density clusters surrounded by fire-dependent vegetation (*i.e.*, chaparral) in areas with a history of fires – like those proposed by the County – have the highest chances of burning (Syphard et al. 2012; Syphard et al. 2013). By approving these Projects, the San Diego Board of Supervisors will be directly endangering the lives of more than 40,000 people by placing homes in the exact arrangement and placement for maximum fire susceptibility in areas where fires will inevitably burn.

## **II. Development in Fire-prone Areas Will Lead to More Human Ignitions and Too Frequent Fire in Southern California Shrublands**

In Southern California, sprawl developments with low/intermediate densities extending into chaparral and sage scrub habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Keeley et al. 1999; Keeley and Fotheringham 2003; Syphard et al. 2007; Syphard et al. 2012; Bistinas et al. 2013; Baleh et al. 2017; Radloff et al. 2018). Human-caused fires account for 95% of all fires in Southern California (Syphard et al. 2013), and homes filled with petroleum-based products, such as wood interiors, paint, and furniture, provide additional fuel for the fires to burn longer and spread farther (Keeley et al. 2007). The most numerous and largest fires in San Diego County have been caused by equipment and powerlines in the wildland-urban interface, where housing density is low to intermediate (Syphard and Keeley 2015), and leapfrog developments have been found to have the highest predicted fire risk in the County (Syphard et al. 2013). With the increased ignition risk that comes with these poorly planned developments in high fire-prone areas, the County will only be fueling more frequent, larger, and more destructive wildfires.

The proposed developments would lead to a dangerous feedback loop of deadly fires and habitat destruction. Most would be placed in areas dominated by chaparral and sage scrub, native California habitats that rely on wildfires to persist. These habitats are adapted to infrequent (every 30 to 150 years), large, high-intensity crown fire regimes (Pyne et al. 1996; Keeley and Fotheringham 2001), and if these regimes are disrupted, the habitats become degraded (Keeley 2005, 2006a,b; Syphard et al. 2018). When fires occur too frequently, type conversion occurs and the native shrublands are replaced by non-native grasses and forbs that burn more frequently and more easily, ultimately eliminating native habitats and biodiversity while increasing fire threat over time (Keeley 2005, 2006a,b; Syphard et al. 2009; Safford and Van de Water 2014; Syphard et al. 2018). Thus, placing developments in these high fire-prone areas will lead to more frequent fires that will threaten the lives of more than 40,000 people who will live in or near these areas while degrading the health and biodiversity of Southern California's special ecosystems.

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### III. Public Safety in These New Development Areas Cannot be Guaranteed

Public safety issues are exacerbated by unreliable infrastructure to accommodate the consequences of more fires. Evacuating from wildfires can be life-threatening and having safety plans in place beforehand is not always enough. For example, while having warning systems and evacuation routes in place are important for fire preparedness and fire safety (e.g., County of San Diego, 2018, Lilac Hills Ranch App J Fire Protection Plan) their functionality when a fire occurs is not guaranteed. Wildfires may ignite with little or no notice, and warning systems can be slow and ineffective at reaching all residents in harm's way. This was the case in last year's Tubbs Fire in Sonoma County and Thomas Fire in Santa Barbara and Ventura Counties, which led to more than 40 deaths and almost \$12 billion in property damage (St. John 2017; Lundstrom et al. 2017).

Instead of placing people and homes in places where residents will have to rely on potentially faulty warning systems and evacuation routes to escape from fires, the County should build homes in areas where fire is least likely to occur, such as in infill development in urban core areas. By avoiding placing developments in fire prone natural areas, the County could reduce the risk of fire and more effectively protect lives, property, and the natural environment.

### IV. The Developments Contain Insufficient Fire Safety Measures and Fire Protection Plans

Despite the glaring wildfire issues of placing developments in fire-prone ecosystems, the County remains complacent with the developers' fire protection plans that rely on fuel modification zones that are counterproductive and guidelines that are inadequate (e.g., County of San Diego, 2018, Harmony Grove Village South FEIR Appendix L Fire Protection Plan). Reliance on general guidelines and firesafe building/planning codes without sufficiently analyzing site-specific conditions or strategically implementing precautionary fire safety measures can lead to a false sense of safety and preparedness. Wildfire risk cannot be addressed with a one-size-fits-all solution.

Large fires in Southern California landscapes dominated by chaparral and shrublands are often associated with foehn winds (strong, warm, dry, and often downslope winds), such as the Santa Ana winds (Keeley 2006b). The region's largest fires have historically occurred in known wind corridors (Moritz et al. 2010). And in severe weather conditions, wind-driven fires can spread quickly – they can cover 10,000 hectares in one to two days (that's an area the size of Escondido, CA), as embers are blown ahead of the fires and towards adjacent fuels (e.g., flammable vegetation, structures) (Syphard et al. 2011).

The primary approach to mitigating fire risk is through home safety measures to make structures less flammable and vegetation reduction in the defensible space immediately surrounding homes. However, a common misconception regarding defensible space in chaparral and scrub habitats immediately surrounding structures is that the wider the fuel modification zone the more protected the structures are from wildfires. For example, the Newland Sierra Project states that they plan to implement a 250-foot fuel modification zone to reduce fire risk, which is more than double the 100-foot fuel modification zone required by state law (County of

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San Diego, 2018 Newland Sierra FEIR, Appendix N Fire Protection Plan). In the September 26, 2018 public hearing, the Board of Supervisors was satisfied that the project was doing as much as they could to mitigate the threat of fire. In addition, some local ordinances require homeowners to clear 300 feet or more of defensible space, and there have been reports of some people being unable to obtain fire insurance without that 300-foot zone (Syphard et al. 2014). However, these actions and guidelines neglect science and may not be appropriate for all regions or habitat types, and they could be dangerously misleading.

In a study conducted in San Diego County, the most effective vegetation treatment distances ranged between 16 to 58 feet from the home (Syphard et al. 2014). Fuel reduction treatments more than 100 feet from structures did not provide additional protection, even for structures situated on steep slopes (Syphard et al. 2014). And because continued disturbance can lead to type conversion from native shrublands to nonnative grasslands that can burn more quickly and easily, extended fuel modification zones could lead to further habitat degradation and increased fire threat (Merriam 2006; Keeley 2006a,b). Thus, asserting that a fuel modification zone beyond the 100-foot requirement provides additional mitigation and improved fire safety in a high fire-prone area gives a false sense of security. The best way to improve fire safety is to proactively reduce exposure to wildfire risk by avoiding the placement of homes in fire-dependent ecosystems (Syphard et al. 2014).

Another critical component of protecting lives and property from wildfires is fire hazard and fire safety education for homeowners in or near fire hazard areas. Structures with fire-resistant features, such as ember-resistant vents, fire-resistant roofs, and surrounding defensible space, have been shown to reduce the risk of destruction due to wildfires (Quarles et al. 2010; Syphard et al. 2014). However, simply stating that the structures are built to fire code does not guarantee that fire threat will be reduced. Proper maintenance and upkeep of the structures themselves as well as the immediate surroundings (*e.g.*, removing leaf litter from gutters and roofing; removing flammable materials like wood fences, overhanging tree branches, or trash cans away from the home) are required to reduce the chances of the structures burning. In addition, external sprinklers with an independent water source would reduce flammability of structures, yet none of the proposed developments include this feature on their structures. And while these fire-resistant structural features are important for fire safety and homeowners should be properly informed, the focus should be on retrofitting existing homes and structures in or near high fire-prone areas with these features, not putting these features on new homes that should not be placed in high fire-prone areas in the first place.

As noted above, the number of homes being destroyed by fires in Southern California are starting to become thousands per year. The arrangement and location of developments have been found to be the main drivers of fire susceptibility, with the highest chances of burning in developments like those proposed by the County – low/intermediate-density clusters surrounded by wildland vegetation in areas with a history of fires (Syphard et al. 2012; Syphard et al. 2013). Thus, the best way to make new construction as fire safe as possible is to avoid placing them in high fire-prone areas (Pincetl et al. 2008; Syphard et al. 2012; Syphard et al. 2013; Moritz et al. 2014). Land-use planning must be reformed to more appropriately consider wildfire risk management.

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#### V. Increased Human Ignitions Will Increase Unnatural Levels of Smoke.

Smoke is a product of the natural and necessary wildfire regime in chaparral and sage scrub ecosystems. However, new leapfrog developments situated in fire-prone chaparral and sage scrub habitats, like those at issue here, will lead to increased human ignitions that will produce increased levels of smoke beyond what is natural. This can lead to harmful public health impacts due to increased air pollution not only from burned vegetation, but also from burned homes, commercial buildings, cars, etc. Buildings and structures often contain plastic materials, metals, and various stored chemicals that release toxic chemicals when burned, such as pesticides, solvents, paints, and cleaning solutions (Weinhold 2011). Thus, human-caused wildfires at the urban wildland interface that burn through developments, as is becoming more common with housing extending into fire-prone chaparral and shrublands, increase the frequency and toxicity of smoke exposure to communities in and downwind of the fires.

Increased fire frequency due to human activity and ill-placed developments will lead to increased occurrences of poor air quality from smoke, which can have public health effects. Hospital visits for respiratory symptoms (e.g., asthma, acute bronchitis, pneumonia, or chronic obstructive pulmonary disease) have been shown to increase during and/or after fire events (Kunzli et al. 2006; Viswanathan et al. 2006; Delfino et al. 2009; Rappold et al. 2012; Liu et al. 2015; Reid et al. 2016). In particular, a study assessing the health impacts of the 2003 Cedar Fire in San Diego County, which burned an area of about 280,000 acres that consisted of chaparral and scrub-dominated landscapes and almost 3,000 structures, there were increases in hospital emergency room visits for asthma, respiratory problems, eye irritation, and smoke inhalation (Viswanathan et al. 2006). The proposed Projects do not thoroughly consider the health impacts that communities will have to suffer if developments are placed in fire-prone shrublands where they will disrupt the natural fire regime and increase fire frequency and smoke exposure. The County needs to consider these public health impacts and refrain from placing poorly-planned, leapfrog developments in landscapes dominated by fire-prone chaparral and shrublands.

#### VI. The Direct Economic Impacts of Wildfires Are Worsening

The direct economic impacts of human-caused wildfires are staggering. The cost of fire suppression and property damage from wildfires in California is over \$18 billion since 2010, which, after adjusting for inflation, is double the cost from the previous three decades combined (Figure 1). Placing more housing in fire-prone natural areas has led to more costly fires, and these patterns will continue should the proposed Projects be approved.

Who shoulders these costs? California and federal residents end up paying in the form of fire insurance premiums and taxes that support Cal Fire and federal government subsidies and grants for homes in high risk areas. And these costs do not include other indirect/hidden costs associated with wildfires, such as the costs of doctors' appointments, medication, sick days taken from places of work, funerals, etc. As the costs of housing in California continues to increase, these costs will also continue to rise, further exacerbating the affordable housing crisis.

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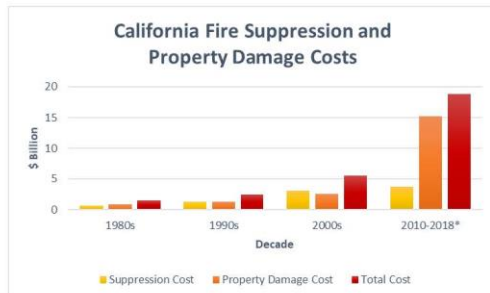


Figure 1. Costs of Fire Suppression and Property Damage by Decade. \*Property damage cost data include 2017 insurance claim estimates and no 2018 costs. Data Source: Cal Fire and the Bureau of Labor Statistics.

**VII. Conclusion**

San Diego County can no longer afford to recklessly neglect the science of wildfires and wildfire risk in Southern California. The devastating environmental, health, social, and economic costs of poorly-planned, leapfrog developments in areas that *will* burn are too great. The Center urges the County to avoid placing developments like Newland Sierra and the Otay Ranch Villages in high fire-prone natural areas. Instead, the County should focus on creating communities in areas with lower wildfire risk, such as in infill development in urban core areas, where people will have access to jobs, public transit, and amenities. In addition, the County should prioritize retrofitting older homes and structures in the wildland-urban interface with fire resistant features, like ember-resistant vents, fire-resistant roofs, external sprinklers, and appropriate defensible space/fuel modification zones. Land-use planning must be reformed to more appropriately consider wildfire risk management and protect human lives, property, and the native biodiversity of Southern California’s unique landscape.

Any focus on forest management to address California’s fires is profoundly misguided. It makes no sense to complain about, and spend millions of dollars on, logging forests that are far away from communities when the actual fire threat facing thousands of families results primarily from poor planning in the interface adjacent to homes and businesses. Moreover, most of 2018’s most extensive fires in California were not even in forests, and instead primarily burned grasslands and chaparral. We must also be honest about the conditions that are actually driving the fires – human ignitions, high winds, drought, and climate-change leading to hotter, drier conditions. Forest management is simply a scapegoat to ignore the difficult problems that need to be addressed, like poor land-use planning and climate change. California needs to stop allowing the building of flammable homes in flammable terrain, and fight climate change, instead of blaming the condition of California’s forests for these fires.

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Thank you for the opportunity to submit comments on these proposed Projects. We look forward to working to assure that the County forges responsible, fire safe planning to safeguard the health and safety of its residents and the natural environment. Please do not hesitate to contact the Center with any questions at the email listed below.

Sincerely,



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## Comment Letter O7: Preserve Wild Santee, July 13, 2020



Preserve Wild Santee

July 13, 2020

Chris Jacobs, Principal Planner  
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 Santee City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071  
 Email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

RE: Fanita Draft Revised EIR (DREIR)

Mr. Jacobs,

Preserve Wild Santee is a community environmental organization that has consistently advocated since 1994 to protect quality-of-life for residents and special status wildlife unique to our scenic geography. Preserve Wild Santee led the successful referendum that defeated the nearly 3,000-unit Fanita subdivision in 1999 by a landslide 2/3 vote.

In fact, Preserve Wild Santee volunteers have gathered over 25,000 signatures throughout the city on Fanita related initiatives and referendum between 1998 and 2018. These signatures and our other legal efforts should make it clear that Santee residents oppose a massive project with unavoidable significant impacts on Fanita. Santee residents prefer conservation of the site as an extension of Mission Trails Regional Park, which has been expanding, in part, due to Preserve Wild Santee conservation efforts.

Yet, here we are again with a massive project proposal that has significant unavoidable impacts to the environment and violates the Santee General Plan. Our comments upon the Fanita Ranch Draft Revised EIR (DREIR) follow.

*"...many of the political leaders we elect and planning agencies we depend upon to create safe communities have failed us. They have allowed developers to build in harm's way, and left firefighters holding the bag."*

*"Planning agencies need to push back against pro-development forces in government, whose willingness to build in known fire corridors borders on criminal neglect...Such policies would cost significantly less than the \$9.4 billion wildfire-related claims submitted statewide as of Friday. [2017]"*

*"...we are choosing to spread cities farther and farther out into wildland areas, we need to recognize that fire disasters aren't natural, they're social."*

<sup>1</sup> Richard W. Halsey, [https://www.latimes.com/opinion/op-ed/la-oe-halsey-social-fires-why-20171207-story.html?fbclid=IwAR3vRjR95\\_Tx9nR3ca63hPFesDA12F280\\_x9aAia92QITSD48RksrQdic](https://www.latimes.com/opinion/op-ed/la-oe-halsey-social-fires-why-20171207-story.html?fbclid=IwAR3vRjR95_Tx9nR3ca63hPFesDA12F280_x9aAia92QITSD48RksrQdic)

**O7**

**O7-1:** This comment states the proposed project violates the Santee General Plan. The project would include approval of a General Plan Amendment in order to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, analyzed the project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2 discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for Fanita Ranch to better adhere to the current project design. The project's consistency with proposed revised 13 Guiding Principles is analyzed in Table 4.10-1. The project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2. The EIR concluded that the proposed project would be consistent with the Santee General Plan, as amended. This issue is adequately addressed in the EIR.

This comment also provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

*Preserve Wild Santee*

O7-2

**DUDEK & Associates fined by the enforcement division of the California Fair Political Practices Commission (FPPC)**

The City, as lead agency and by choice of the applicant, for preparation of Wildfire and Biological reports, has relied upon a firm that has demonstrated clear bias in favor of project approval. Dudek & Associates was fined for laundering campaign contributions to a pro-Fanita Ranch incumbent running for reelection. [AR 1:193:018971-72, 019375, 019377] Conclusions of the Dudek prepared 2020 Fire Protection Plan differ significantly on terms favorable to the applicant from the conclusions of experts who prepared the 2007 FPP.

**Dudek & Associates, 2000/01898 (2000)**

**\*84300 & 84301 - 2 counts**

**\$3,600**

**"Dudek & Associates...laundered campaign contributions to a candidate for the Santee City Council in 1998." [FPPC Appendix IV, Summary of Enforcement Decisions, p. 83]**

**O7-2:** The comment questions the impartiality of Dudek, the environmental consulting firm retained by HomeFed Fanita Rancho, LLC (applicant), to prepare the Fire Protection Plan (FPP) (2020) (Appendix P1) and related documents for the currently proposed project. The documents cited in the comment relate to campaign contributions made over 20 years ago and do not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR for the proposed project. Under CEQA, lead agencies may either retain a consultant to prepare the EIR or accept an EIR (or related technical reports) prepared by the applicant or the applicant’s consultant, rather than have agency staff prepare the documents (California Public Resources Code, Section 21082.1, and CEQA Guidelines, Section 15084). While CEQA is clear that a lead agency can use CEQA documents prepared by the project applicant, the lead agency is still responsible for ensuring the EIR is adequately prepared and certified and for the objectivity of the EIR. As the lead agency, the City of Santee (City) must independently review and analyze the EIR and specifically find that it reflects its independent judgment (California Public Resources Code, Section 21082.1(c)(3); CEQA Guidelines, Section 15084(e)).

The comment further questions the conclusions in the FPP (2020) (Appendix P1) compared to the 2007 FPP. As

explained in Section 2.2 of the EIR, the EIR evaluates the proposed project as a modification of the prior project while also addressing any applicable portions of the earlier environmental analysis for the prior project approved in 2007 that were found inadequate by the trial and appellate courts. A detailed explanation of the differences between the FPP (2020) (Appendix P1) for the proposed project and the 2007 FPP is provided in Section 4.18.7 of the EIR and Section 9.2 of Appendix P1.

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4.18 Wildfire

- 07-3 The FPP fails, in part, because it is framed by an attempt to protect a predetermined project footprint. The FPP approaches the land use plan as a given. Potential fire intensity should have been a primary factor that influenced where development would be located on the site.
- 07-4 Instead of considering the diverse topography and vegetation of the site, the regional alignment with a vast open space fire corridor and the potential for specific portions of the site to burn at high intensity with a thoughtful effort to develop a lower risk design footprint, the FPP attempts to mitigate development on locations at higher risk by utilizing ignition resistant structures and extending Fuel Management Zones (FMZ) to new extremes. The 2020 FPP also abandons the 2007 FPP's requirement to reduce fuel accumulation in the open space preserve. [AR 018488]  
  
**This is a recipe for disaster and it is an example of why CAL FIRE Director Ken Pimlott stated prior to his departure that development in Very High Fire Hazard Severity Zones (VHFHSZ) should stop. It's why the legislature is considering such prohibition with SB 474.**  
  
*"California's increasingly deadly and destructive wildfires have become so unpredictable that government officials should consider banning home construction in vulnerable areas, the state's top firefighter says...Officials must consider prohibiting construction in particularly vulnerable areas, said Pimlott, who has led the agency through the last eight years under termed-out Gov. Jerry Brown. He said it's uncertain if those decisions should be made by local land managers or at the state level as legislative leaders have suggested. But Pimlott said, "we owe it" to homeowners, firefighters and communities "so that they don't have to keep going through what we're going through." "We've got to continue to raise the bar on what we're doing and local land-use planning decisions have to be part of that discussion," he said...He said he has seen fire conditions worsen each passing year during his three decades with the agency, taking its toll on residents and firefighters alike. "Folks can say what they want to say, but firefighters are living climate change. It's staring them in the face every day," he said. To adapt...City planners must prepare communities "unlike we ever have before" with easy evacuation routes and new evacuation centers. And he said Californians must treat "red flag" extreme fire danger warnings the way Midwesterners treat tornado warnings — as imminent threats."<sup>2</sup>*
- 07-5 Significant wildfire risk could be avoided by eliminating or relocating the "Vineyard Village" island of development proposed for the northeast high elevation portions of the site to be embedded within chaparral.
- 07-6 Nor does the FPP offer a single thought on the trend of increasing weather extremes due to the acceleration of climate breakdown (including droughts and Santa Ana winds of greater intensity).  
  
 If the trend of record setting high temperatures continues, including severe periods of drought with extended fire seasons, what are the projections for fire intensity on site and the already extreme FMZs?

<sup>2</sup> Patricia M. Alexander. <https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/eap.1376>  
<sup>3</sup> <https://www.capradio.org/articles/2018/12/11/retiring-cal-fire-director-california-must-mull-home-ban-in-fire-prone-areas/>. SB 474 would prohibit subdivisions in VHFHSZ.

**07-3:** This comment states the project-specific FPP (2020) (Appendix P1) fails by approaching the land use plan as a given. The Dudek fire protection planning team completed a standard fire environment assessment and risk analysis, including potential fire intensity, across the project area. Based on the proposed project footprint, there were no areas planned for development that were considered to be at greater risk that could not be effectively mitigated through customized fuel modification zones (FMZs), particularly when combined with other fire protection features detailed in the FPP (2020) (Appendix P1).

**07-4:** The comment inaccurately describes the comprehensive process for FPP analysis, interface with project applicants and design team, and development of appropriate fire protection on a given site. The comment also inaccurately claims that FMZs are extended to new extremes. This is a false statement. FMZs are established through the site specific environment, fire behavior modeling, and experienced fire fighter and fire protection planner judgement. In some locations, the FMZ has been extended to 150 feet, which is 50 percent larger than the standard City FMZ, but is significantly less than required for other projects, including Newland Sierra, which includes 250 feet wide FMZs and all Orange County Fire Authority FMZs, which are 170 feet wide. The comment purports that the FPP (2020) (Appendix P1) abandons recommendations in the 2007

FPP for open space fuel reduction. The FPP (2020) (Appendix P1) details why open space fuel reduction is unnecessary, and is based on the fact that fire science indicates the best way to protect structures is by vegetation management at and near the structures. There have been various California bills focused on fire safety that could change dramatically if and when they become law. Senate Bill (SB) 474 is in its early stages of committee discussion, and it would be speculative to assume that it will become law in its current form.

- O7-5:** This comment states significant wildfire risk could be avoided by eliminating or relocating the Vineyard Village development. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. However, the No Vineyard Village Reduced Project Alternative is one of five project alternatives evaluated in Chapter 6.
- O7-6:** This comment states the FPP does not offer information on the trend of increasing weather extremes due to acceleration of climate breakdown. The FPP (2020) (Appendix P1) fire environment analysis is based on a worst case condition using fire behavior inputs from extreme fire events. It is speculative to assume climate change will have a significant impact on fire behavior in Southern California, specifically given recent research that indicates climate change impacts will be primarily realized

in higher elevations. The comment states that climate change will greatly increase the potential for wildfires, but new research has shown that there will not be as significant of an impact on Southern California shrublands than is anticipated in the coniferous forests of the Sierra Nevada and Northern California.<sup>1</sup> Indeed, the researchers demonstrated that drier conditions in California's forests will certainly increase potential for large, severe fires there; in Southern California shrublands, however, the impact will be significantly less, owing to the fact that that region already experiences a severe annual drought. Instead, Southern California's increasing population will make it more likely that ignitions will occur, which could potentially cause large areas of chaparral to type-convert into grasslands.

Also, it should be noted that continued development has the potential to actually reduce the risk of ignition of older developments that were not built with today's construction standards and codes<sup>2</sup>. While this would certainly not be the case if new communities were developed with old building codes, expansion of new development (built to increasingly stringent codes) could buffer older fire-prone communities.

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<sup>1</sup> Keeley, J., and A. Syphard. 2016. Climate change and future fire regimes: examples from California. *Geosciences* 6:37. 14pp.

<sup>2</sup> Dicus, C.A., N.C. Leyshon, and D. Sapsis. 2014. Temporal changes to fire risk in disparate WUI communities in southern California, USA. Pgs. 969-978 *In* Viegas, D.X (Ed.). *Advances in Forest Fire Research*. University of Coimbra Press. ISBN 978-989-26-0884-6.



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07-7	The FPP fails to disclose that a wildland fire that transitions into an urban fire generates higher intensity burns with greater duration which has significant implications for safety zones, evacuations, temporary refuge areas, shelter in place and suppression strategies.
07-8	Furthermore, the FPP reveals its bias on behalf of the applicant by not even mentioning the potential for cluster burns.
	<b>Key Data</b>
	4.18-1 "Drying vegetation with fuel moisture of less than 5 percent for smaller fuels (which dry faster than larger fuels) is possible during the summer months..."
07-9	"Extreme conditions used in worst-case fire modeling for the project site include 92° F temperatures in summer and winds of up to 50 miles per hour during the fall based on worst-case conditions from County data sets during the Cedar Fire (in 2003)."  [92° F is not accurate for worst-case fire modeling.] Temperatures on site have exceeded 115° F in spring, summer and fall.  Relative humidity of 12 percent or less is possible during fire season."
	<b>4.18.1.2 Vegetation (Fuels)</b>
07-10	"28 vegetation communities..."  "The project is located within the wildland urban interface (WUI) and is statutorily designated a Very High Fire Hazard Severity Zone (VHFHSZ)..."
	<b>4.18.1.3 Fire History</b>
	"Within 3 miles of the project site, there have been 65 fires recorded by CAL FIRE since 1910 (FRAP 2018)".  "The most notable fire, the Cedar Fire... was driven by Santa Ana winds, causing the fire to spread at a rate of 3,600 acres per hour."
07-11	<b>4.18.5.2 Threshold 2: Pollutant Concentrations</b> Would the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire?  Impact: The proposed project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire.  Mitigation: No mitigation is required."  In fact, the project <u>would</u> , due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire."

- 07-7:** This comment states the FPP fails to disclose that wildland fire that transitions into an urban fire generates higher intensity burns with greater duration. The FPP (2020) (Appendix P1) details the fire protection system, including structural ignition resistance, access, landscape, fire response, water availability, and others, that combine to minimize the potential for a wildland fire to transition into an urban fire. This multi-layered system includes redundancies that limit the potential for fire spread beyond the perimeter FMZs, protect structures from airborne embers, the leading cause for wildfire structure loss, and provide fast response throughout the site. The approach for new communities built to the requirements of the proposed project is to exclude fire from within the developed areas. Please refer to Thematic Response – Fire Protection and Safety for additional details.
- 07-8:** The comment accuses the FPP (2020) (Appendix P1) of bias by not addressing cluster burns. Please refer to the Thematic Response – Fire Protection and Safety for details regarding why cluster burning would not be expected based on the design and planning of the project site’s landscape and structures.
- 07-9:** The weather inputs described in this comment are accurate and valid fire behavior inputs for this site. Adjusting the temperature, as indicated in the comment,

would not be accurate and would not have significant impacts on modeled fire behavior. The additional fire protection features and extended FMZs in some locations accounts for aggressive fire behavior beyond what was modeled in the FPP (2020) (Appendix P1).

- O7-10:** This comment accurately quotes from the FPP (2020) (Appendix P1). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- O7-11:** This comment accurately quotes from the FPP (2020) (Appendix P1) but provides an unsupported opinion regarding the project exacerbating wildfire risk. The FPP provides details regarding its conclusions, which are based on CEQA consistent analysis and protocols.

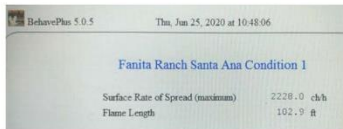
Preserve Wild Santee

07-12 There are several factors why the conclusion of “no mitigation is required” by the DREIR is false. The northern portion of the project site is aligned perfectly with the east, northeast Santa Ana wind fire corridor utilized by the Cedar Fire in 2003. The northern portion of Fanita burned in the early morning with a high-intensity flame front that blew by the southern portions of the site like a freight train. Instead of burning in the morning along with homes further west in San Diego, the southern fire flanks burned the southern portion of the site in afternoon and evening reflecting slower fire spread relative to the fire front that rapidly stormed through the northern portion of the site.<sup>4</sup> The applicant has chosen to locate development in the highest intensity burn zone aligned with the offsite vegetation fire corridor.



07-13 Second, the northeast portion of the site has the greatest accumulating biomass. The chaparral vegetation is capable of generating flame lengths in excess of 100-feet under extreme weather conditions. [2007 FPP @ AR II:6:28596, II:6:28606, II:6:28607, AR 009258-009260]

07-14 Third, the project proposes to site development above numerous natural fire chimneys aligned with Santa winds and vegetated with dense chaparral. [66 feet flame lengths disclosed by a new FPP in 2020 underestimates potential fire intensity in the northeast chaparral]



<sup>4</sup> Personal observations while performing structure preparations on the Cedar Fire WUI, at Strathmore Drive, Santee and observing strip firing operations on the western edge of Sycamore Canyon, October 26, 2003.

**07-12:** This comment states the “no mitigation required” conclusion by the EIR is false. As detailed in the FPP (2020) (Appendix P1), and in the comment, the analysis considered the area’s fire history and fire behavior based on site-specific fire environment inputs, amongst the comprehensive fire environment assessment factors. Based on that fire history, the FPP states (Section 2.2.7) that the site will experience wildfire again, and because of that, the project has incorporated design features that have been demonstrated to minimize wildfire exposure and impacts to persons and property. Please refer to the Thematic Response – Fire Protection and Safety for additional details regarding the wildfire protection features customized for the proposed project.

**07-13:** This comment states chaparral vegetation is capable of generating flame lengths in excess of 100 feet under extreme weather conditions. Contrary to the comment’s assertion, the chaparral in the northeastern portion of the project site is not expected to produce 100-foot plus flame lengths. The fire behavior modeling conducted in the 2007 FPP used one of the original fuel models that has consistently been demonstrated to over predict fire behavior. Since that time, more accurate and customized fuel models have been developed for Southern California. The fire behavior analyst that conducted modeling for the proposed project relied on his nearly 35 years of experience fighting wildfires and modeling fire

behavior for federal, state, and local fire agencies. Please refer to Section 9 of the FPP (2020) (Appendix P1) for details on the fire behavior modeling differences between the 2020 and 2007 FPPs.

- O7-14:** The comment expresses an opinion regarding fire behavior modeling. Please refer to response to comment O7-13 regarding the accuracy of the fire behavior modeling results in the FPP (2020) (Appendix P1).

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- O7-15 | All of these factors potentially expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of wildfire. These are significant impacts that can be avoided by relocating the development sites, realigning the most vulnerable home sites or selling Fanita for conservation.
- O7-16 | **Tab 2(gg) App P1 Fire Protection Plan and Construction Fire Prevention Plan**  
**Executive Summary**  
*"The FMZs, when properly maintained, have proven effective at minimizing structure ignition from direct flame impingement or radiant heat, especially for structures built to the latest ignition resistant codes. The FMZs for Fanita Ranch would be maintained in perpetuity by the homeowner, homeowner's association (HOA), Habitat Preserve Organization, a funded Community Services District (CSD), or similarly funded entity."* [viii]  
 FPP 2007 concludes **proper maintenance requires** "A fuel treatment program using prescribed fire (Rx) to manage the open space on a planned rotational basis." [AR 018488]  
 What is the total distance of WUI around structures and roads that must be maintained? Please disclose by category.  
 What is the total acreage of WUI FMZs around structures and roads that must be maintained? Please disclose by category.  
 How many hours and employees are needed to maintain the miles of WUI and acreage to inspection standards?  
 How many days out of the year on average must power tools used for maintenance halt use at 10 AM due to heat, low humidity, wind and increased risk of ignitions?  
 As climate continues to break down, how is the time available for maintenance expected to diminish? How might that impact the feasibility of retaining a workforce that has to halt operations by 10 AM or earlier on high-risk days/hours?
- O7-17 | Dependence upon HOAs to "properly" maintain FMZs has proven problematic in Santee on the Sky Ranch and elsewhere in California.

- O7-15:** The comment asserts that the previous comment statements (addressed in responses to comments O7-3 through O7-14) result in significant impacts and provides an opinion on ways to avoid the significant impact. Please refer to responses to comments O7-3 through O7-15 and the Thematic Response – Fire Protection and Safety for an explanation of why the commenter’s opinion is not supported.
- O7-16:** This comment asks for details on the FMZs. Please refer to the Chapter 3, Project Description, in the EIR for requested FMZ acreages and area calculations. FMZ maintenance would occur on an ongoing basis and would be inspected by a third-party wildland-urban interface experienced inspector twice annually. Maintaining the site’s landscape, including the FMZ areas would not be impacted by the speculative notions expressed in the comment. For example, Red Flag Warning days, when low humidity and high winds elevate the potential for fire ignitions and spread, typically occur, on average, fewer than 10 days per year. Although there is research suggesting that Southern California is not expected to experience major changes, assuming that the number of Red Flag Warning Days doubled or tripled, there would still be in excess of 230 workdays to provide maintenance. Note that the FMZs are going to be planted such that maintenance would be

minimal, so maintaining them over time would not require extensive vegetation manipulations.

- O7-17:** The comment questions whether the FMZs for the Sky Ranch project in Santee have been properly maintained and “elsewhere in California” without further examples or specifics. The majority of the Sky Ranch FMZs have been maintained by the Sky Ranch Community Association (HOA) without incident. There was a dispute between the Sky Ranch HOA and the developer (Lennar) as to which entity was responsible for maintaining a certain area of the FMZ (APN 385-433-35-00) known as Lot L, which was the subject of Michael Root’s presentation mentioned in the comment. Lennar and the HOA have settled their dispute, as evidenced by the certain Memorandum of Settlement Agreement dated July 1, 2020 and recorded in the office of the San Diego County Recorder as Document No. 2020-0347923. Pursuant to the terms of the Settlement Agreement, the HOA has agreed to maintain Lot L, including allowing for irrigation on Lot L in a similar manner as it currently maintains other properties within the FMZ. The HOA has further agreed that it will abide by all requests from the City regarding such maintenance obligations.

Please refer to the Thematic Response – Fire Protection and Safety regarding the proposed project’s HOA obligations and abilities to perform FMZ maintenance.

*Preserve Wild Santee*

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(13) CONFERENCE WITH LEGAL COUNSEL—ANTICIPATED LITIGATION (Government Code Sections 54956.9(d)(2) and (4)) Significant exposure to litigation pursuant to paragraph (2) of subdivision (d) of Section 54956.9 and the potential initiation of litigation pursuant to paragraph (4) of subdivision (d) of Section 54956.9 related to Lot L and the FMZ zones at Sky Ranch and involving as potential parties Lennar and the Sky Ranch Homeowners Associations

[Presentation of Sky Ranch resident Michael Root to Santee City Council regarding hazardous vegetation on Lot L, October 23, 2019. And Item 10, February 12, 2020. And February 26, 2020, regarding hazardous Fuel Management Zones including Item 13 Significant Exposure to Anticipated Litigation]

Fanita Ranch owners have had difficulty maintaining the existing WUI. Much of it would not pass a defensible space inspection if conducted by CAL FIRE. [Personal experience as a CAL FIRE DST and independent reviews of the Fanita WUI]



[Fanita WUI June 15, 2020]

**O7-18:** This comment states the project site owners have had difficulty managing the wildland urban interface. The current owners of the project site provide ongoing fuel management based on its ranch status, including providing defensible space on its perimeter areas where it abuts existing neighborhoods. With the proposed project, the HOA would be required to provide the ongoing maintenance and it would be monitored by a third party approved by the Santee Fire Department. This third party would inspect twice per year and report to Santee Fire Department with enforcement authority.

*Preserve Wild Santee*

O7-19	<p>Altering chaparral and shrub lands requires continual maintenance to prevent a conversion into more flammable non-native flash fuels that increase the risk of ignitions. This significant impact is potentially exacerbated by a change to Santee's ordinance, which now calls for a limit of 30% native plants in FMZ 2. Removal of 70% of the native cover guarantees a constant battle with invasive annual flash fuels. This is a significant adverse impact of an intended mitigation measure.</p> <p>What methods will be relied upon to combat the invasion of flash fuels and what evidence demonstrates these methods would be feasible on the scale of a lengthy WUI?</p> <p>What are the adverse impacts of any measures proposed to maintain a 30% native/ 70% non-native fuel management zone?</p> <p><b>"Santee Municipal Code City Ordinance 570"</b></p> <p><b>4907.2.2 Fuel Modified Defensible Space, Zone Two.</b> "Zone Two" is the second 50 feet of the 100 total feet of defensible space and is measured 50 feet from the structure to a total of 100 feet toward the wildland. Zone Two shall consist of low-growing, fire-resistant shrubs and ground covers. Average height of new plants for re-vegetation should be less than 24 inches. In this Zone, no more than 30% of the native, nonirrigated vegetation shall be retained. This area requires inspection and periodic maintenance. This area shall be maintained by the property owner or applicable homeowners association(s).</p>
O7-20	<p><b>2.2.8 Analysis of Wildfire Risk from Adding New Residents</b></p> <p>Section 2.2.8 attempts to diminish the risk associated with new residents by acknowledging the increased risk of ignitions - noting "Roadways are a particularly high source of ignitions" but then stating "Approximately 90 to 95 percent of wildfires are controlled below 10 acres (CAL FIRE 2019; Santa Barbara County Fire Department 2019)." [p. 25]</p> <p>While the statements are true, the suggestion that 5-10% of ignitions that exceed 10 acres are not significant threats is not. These ignitions often cause extensive damage to life and property.</p> <p>Santee's existing interface with the Fanita Ranch consists of older homes highly susceptible to ember storms. Backfiring from and strip firing near this interface was an important suppression tactic used during the 2003 Cedar Fire. [Personal observation]</p> <p>The 2007 FPP required preserve open space management to reduce the significant threat from embers to life and property. [AR 018519-23] The requirement to manage the preserve vegetation would have had significant impacts to threatened species, was thus abandoned and became a contentious issue in litigation because the threat from biomass fuels buildup and embers remained significant.</p> <p>For the 2020 FPP, the addition of a new fire station on Fanita along with new fire access points/roads is likely to result in more rapid initial attack and control of fires under mild to moderate weather conditions. In addition, the new project footprint can provide some shielding for Santee's existing WUI for fires burning under mild to moderate weather conditions. In these instances, fires that would have burned through significant portions of the site under moderate weather conditions will no longer do so. The combined impact of more rapid and effective initial attack with shielding of open space in between existing and new development will add biomass to the shielded preserve area that was formerly burning under moderate weather conditions.</p>

**O7-19:** This comment asks what methods will be relied on to combat the invasion of flash fuels on the project site. It is true that the outer thinning fuel management zone (FMZ) (50 to 100 feet wide) is required to remove 70 percent of the existing native vegetation, per Santee Ordinance 570. However, one must understand that in its existing condition, much of the area that would be located in the planned Zone 2 is currently at an estimated 50 to 75 percent cover, so reducing to 30 percent would remove 20 to 45 percent of the existing vegetation. The change would not be as dramatic as presented in the comment. FMZ maintenance to mow and trim any flashy fuels that establish is routine throughout Southern California. Where grasses establish between allowable shrubs, they would be mowed to an acceptable stubble height that would not readily facilitate fire spread. These types of fuels become most hazardous when they dry out in the late spring. However, under the proposed project, maintenance would occur as needed, resulting in the avoidance of grasses drying and becoming potential fire ignition and spread facilitators.

**O7-20:** The comment acknowledges the accuracy of the FPP (2020) (Appendix P1) regarding ignitions, the ability of the project site to alter wildfires on the terrain by representing a large ignition-resistant fuel break, and the positive impacts of having fast response from an on-site fire station. The comment then suggests that because



there is no fuel modification proposed in the open space, and because fires will be stopped before they can become large fires, that this will lead to an accumulation of fuels in the open space that normally would be burned and remain in a lower fuel condition. This argument conflicts with earlier comments presented in the comment letter. Specifically, it is important to note that areas that burn frequently are subject to type conversion to flashy fuels, similar to comment O7-19 regarding fuel modification maintenance and flashy fuels. The goal is to preclude fire from areas for long durations to enable the shrub lands to age and function, as they are relatively resistant to ignitions compared to flashy fuels. As explained in the Thematic Response – Fire Protection and Safety and the FPP (2020) (Section 9), fire science indicates that protecting communities equates to building ignition-resistant structures and then providing fuel modification next to and near the structures. This is consistent with the proposed project’s approach along with providing fuel modification on the proposed project’s perimeter as a benefit to existing, more fire-vulnerable structures. Allowing the open space fuels to mature absent of fire is a goal, not something to be avoided. When these areas do burn, which is anticipated in the FPP, the provided FMZs close to the structures, along with the sites ignition and ember resistance, they would not be expected to impact the project.

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O7-21	<p>Thus, the project has a two-fold significant adverse impact upon existing development due to increased fuel loads and preclusion of backfiring. The addition of life and property on developed islands to the northeast precludes the ability of strip firing and backfiring from the older WUI as was performed during the 2003 Cedar Fire. This tactic becomes infeasible because new development is now in the path of a backfire ignited from the older WUI. (Note - Backfiring from flanks may be the only effective suppression tactic under severe weather conditions).</p> <p>At the same time, fuels will accumulate due to the addition of more rapid initial attack and abandonment of the requirement for preserve management to reduce ember impacts as prescribed by the 2007 FPP.</p> <p>Firestorms under severe weather conditions would still burn through the site, but after project impacts that increase fuels, <u>at greater intensity</u>.</p> <p>“The Santa Ana winds with wind gusts of up to 60 mph blowing from the northeast/east pose a significant threat from wind-blown embers to all structures within this project.” [FPP 2007, AR 018501]</p> <p>These are significant impacts that must be disclosed, avoided or mitigated by reconfiguration of the development or other means (i.e., hardening existing homes within 1 mile of the existing WUI).</p>
O7-22	<p>Section 2.2.8 makes a general comparison of high-density housing proposed for the site with low-density housing that is not and never has been proposed in any Santee General Plan. The largest lots (lowest density) housing allowed by Guiding Principle 3 is 1/2-lots for half of the site, with 10,000 sq. feet for 1/4 of the lots and 6,000 sq. feet for the remaining 1/4 of the lots. The General Plan lots allowed are in a range that is between the Section 2.2.8 comparisons. The majority of General Plan consistent homes would be sited at distances apart from each other that are less susceptible to cluster burns from direct flame impingement by a burning adjacent structure. What are the distances between structures for the high-density development proposed on Fanita? What is the potential for direct flame impingement between adjacent structures?</p> <p>High-density development in a VHHHSZ is susceptible to cluster burns. Homes sited in Figure 6 are susceptible to cluster burns. If Fanita will have similar tight distances between structures, then they would be also. Ignition resistant measures proposed do not make homes fireproof.</p> <p><i>“Fire is a dynamic and somewhat unpredictable occurrence and as such, this plan does not guarantee that a fire would not occur or would not result in injury, loss of life or loss of property. There are no warranties, expressed or implied, regarding the suitability or effectiveness of the recommendations and requirements in this plan, under all circumstances.” [2020 FPP p. 102]</i></p>
O7-23	<p><b>3 Determination of Significance Thresholds</b></p> <p><b>“1. Substantially Impair An Adopted Emergency Response Plan/Emergency Evacuation Plan”</b></p> <p><b>What is time estimate for fully evacuating the project site including mobilization time?</b></p> <p><b>All traffic evacuating the site must utilize or cross Mast Boulevard. What are the road capacities and levels of service on Mast Boulevard street segments and other required arterials?</b></p> <p><b>How do time estimates for evacuating the site change with the time of day and LOS on major arterials?</b></p>

**O7-21:** The comment reiterates concepts introduced in comment O7-20. Please refer to response to comment O7-20 for details. The comment also states that firefighting strategies may not be available with the proposed project that were available in 2003. The proposed project could alter some firefighting strategies, potentially including backfiring, but the proposed project also provides operational advantages that are not currently available. For example, the proposed project presents a large fuel break. It provides anchor points for fire retardant drops that can intersect with the perimeter FMZs. It provides protected access for ground based fire fighters and fire engines that currently would not be used due to potential exposure. Additionally, the comment indicates that the 2007 FPP discloses that embers are a significant issue for all homes in the proposed project and that these types of disclosures must occur. Flying embers and many other potential fire threats to proposed project structures have been evaluated and addressed/disclosed in the FPP (2020) (Appendix P1). For example, embers are mentioned 270 times in the FPP, including in Section 6.4.1 where it states that embers are one of two primary concerns for the site’s structures.

**O7-22:** This comment asks what the distances between structures for the high-density development proposed on the project site and what is the flame impingement between adjacent structures. The referenced home

spacing information in the FPP (Section 2.2.8) is provided to illustrate that research supports development like the proposed project in terms of condensing the developed areas, which equates to higher density. This reduces wildland urban interface, provides a more defensible edge, and equates to large fire breaks on the landscape with virtually no fire pathways into the developed areas due to the conversion of vegetated landscapes to ignition-resistant landscapes and buffers. Cluster burning is a phenomenon experienced in older communities or communities that did not provide a system of fire protection. When a structure ignites from an ember penetrating into the interior or from direct heat/flame on the structure's surface, or even from an interior fire, when close to adjacent structures, these structures may be subject to ignition, if not properly protected. However, new communities in the City are required to include a redundant system of protections that minimize this potential. For example, as previously mentioned, the landscape and FMZs are designed and maintained to avoid direct heat or flame on community buildings. There would not be an ignition from direct heat or flame. Second, the buildings are designed to prevent ember penetration, minimizing the potential for this type of ignition (there is still a low probability if a window is left open during a wildfire). Further, if an interior fire ignites, the fire sprinklers have proven over time to perform extremely well at extinguishing or

keeping the fire to the room of origin, minimizing the potential for an adjacent structure to be subject to direct heat/flames. Additionally, the exteriors of the buildings, including windows, are required to meet fire ratings that also minimize the potential for ignition. Lastly, fast response from an on-site fire station and a robust regional wildfire defense capability, further minimizes the potential for cluster burning in a new, ignition-resistant community.

- O7-23:** This comment asks what the time estimate for fully evacuating the project site and traffic evacuation details. Please refer to the Thematic Response – Evacuation for details regarding evacuation procedures and protocols as well as estimated evacuation timeframes.

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07-23 cont.	<p>How many residential streets within the project site are oriented north, northeast and east forcing potential driving toward the fire without an alternative? What are the distances for each of these street segments?</p> <p>Alternative circulation patterns can reduce potential for evacuation panic?</p> <p>"Project access roads that traverse areas of natural vegetation (consistent with current fuels) would provide a minimum of 50 feet of modified fuel areas along both sides of the road." [p. 30]</p> <p>What are the flame lengths estimated on either side of the unmanaged areas these routes traverse?</p>
07-24	<p><b>"2. Due to Slope, Prevailing Winds, and Other Factors, Exacerbate Wildfire Risks and Expose Occupants to Pollutant Concentrations From A Wildfire or Uncontrolled Wildfire Spread"</b></p> <p>Under what weather conditions will mechanical construction operations with potential to result in ignitions be halted to protect homes on the existing WCI?</p> <p><b>4 Anticipated Fire Behavior</b></p> <p><b>4.12 BehavePlus Analysis</b></p> <p>"The sage scrub chaparral habitat on and adjacent to the project site is in varying stages of fire recovery following the 2003 Cedar Fire. As such, fuel loads are expected to increase over time, with mature chaparral potentially reaching continuous cover of 10 to 15 foot tall shrubs on northern, mesic slopes and mature sage scrub reaching 2 to 3 feet tall shrubs on south or southwest facing, drier slopes. Based on the location of modeling scenarios, a fuel model 4 (dry climate shrub with high fuel load representing chamise-chaparral fuels) and a fuel model SH5 (dry climate shrub with moderate fuel load representing sage scrub fuels) were used for all BehavePlus fire behavior modeling runs." [p. 38]</p>
07-25	<p>"...flame lengths can be expected to reach up to approximately 28.2 feet with 19 mph wind speeds (prevailing Summer condition) and 66.1 feet with 41 mph wind speeds (Peak condition). Spread rates range from 1.8 mph (summer) to 10.1 mph (Peak). Spotting distances, where airborne embers can ignite new fires downwind of the initial fire, range from less than a mile (summer weather condition) to 2.8 miles (Peak weather condition). [p. 38]</p> <p>"A worst-case summer fire (summer condition) would result in a fire spreading at a rate of up to 4.3 miles per hour (mph). During a fall fire with gusty Santa Ana (Peak condition) winds and low fuel moisture, fire is expected to be fast moving at up to 17.3 mph with highest flame length values reaching approximately 66 feet in specific portions of the property. Spotting is projected to occur up to nearly 1.0 mile during a summer fire and nearly 2.8 miles during a fall fire." [p. 38]</p> <p>Table 3 BehavePlus Fire Behavior Modeling Results are correct for the model inputs utilized. However, adjusting variables, such as for lower humidity, would yield greater fire intensity / flame lengths.</p>
	10
	<p>9222 Lake Canyon Road, Santee, CA 92071 Tel/Fax (619) 258-7929 SaveFamilies@ccoc.net LD#980429 PreserveWildSantee.org</p>

**07-24:** This comment asks under what weather conditions will mechanical construction operations with potential to result in ignitions be halted to protect homes on the existing wildland-urban interface. Appendix P1, Appendix H, indicates the conditions where construction activities would be limited/alterd. Typically, Red Flag Warning Weather, when the National Weather Service issues a warning, would trigger the changes in certain activities that can result in heat, sparks, or flames near vegetation.

**07-25:** The comment accurately quotes from the FPP (2020) (Appendix P1). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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O7-25  
cont.

"Model results should be used as a basis for planning only, as actual fire behavior for a given location will be affected by many factors, including unique weather patterns, small-scale topographic variations, or changing vegetation patterns. [p. 40]

Modern structures lost in recent fires



Many of the homes destroyed on Andorra Lane were ignited by embers, not by walls of flame, experts say. (Photo by Morgan Lieberman/KPCC)

The FPP fails to disclose and discuss the loss of fire resistant homes built with upgraded Chapter 7A code. Fires in Ventura County (2017 Thomas Fire) and Butte County (2018 Camp Fire) are examples. In Ventura 4 of the 9 homes in the new subdivision burned.

O7-26

"Almost no one expected it. After all, the homes were brand new. They were surrounded by dozens of other homes. And most importantly, they met the state's building codes for areas at heightened risk of wildfires."

"Ventura City Fire Marshal Joe Morelli thinks topography played a role...And even with the fire-resistant construction standards you can still have loss. They're not fireproof standards."

"According to Cal Fire data, 80 percent of houses destroyed in the Thomas Fire had fire-resistant exteriors and 90 percent had fire-resistant roofs."

"Where you build your home is more important than what materials you build it from, says fire ecologist Alexandra Syphard"

"To fire ecologist Alexandra Syphard with the Conservation Biology Institute, it's becoming increasingly clear that houses built in risky places are impossible to fireproof. "You can make a big difference in increasing the potential safety of your house, but you can't guarantee that it's not going to burn," she said. Her

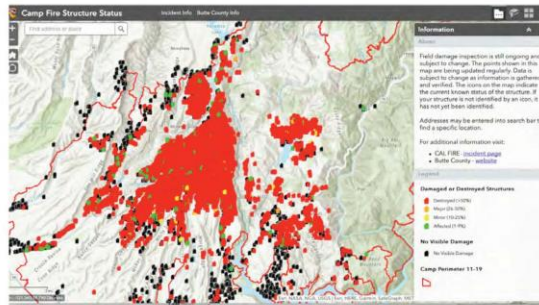
**O7-26:** The comment refers to the Thomas Fire and structures lost that were built post-2008. The comment provides quotations from fire officials indicating that topography and embers were the biggest factors for structure loss. This is consistent with the conclusions of the FPP (2020) (Appendix P1) and that is why the FPP requires code-exceeding ember resistant vents throughout all proposed buildings. Even though some of the buildings built to newer codes were lost to wildfire, the ember penetration cause referred to in the comment indicates that they included only the metal mesh required in Chapter 7A of the building code. Mesh sizes have been varied over the code cycle updates to attempt to address the ember penetration issue, for example, the requirement has been reduced over the code updates to openings of 1/4 inch to the current 1/16 to 1/8 inch. However, the proposed project is required by the FPP (2020) (Appendix P1) to provide specific vents that were designed to capture embers through a series of internal baffles or a similar closing vent that are tested and approved by the State Fire Marshal's Office. Please refer to the FPP Sections 3, 6.4.1, and Appendix I for vent details. Similarly, the system of fire protection that is required for the proposed project was not required for all of the referenced homes that were lost. The newer homes lost were in various landscapes and with varying degree of fuel modification. It is not as simple as stating that

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O7-26  
cont.

research has found that *where you build your house, not what it's made of, is the biggest factor in determining whether it will burn.*<sup>5</sup>

In the Butte County, Camp Fire, 41% of the homes totally destroyed in the fire path were built with modern, post 2008 Chapter 7A code.<sup>6</sup>



Camp Fire path of destruction

O7-27

5 Emergency Response and Service

California fires under Santa Ana wind conditions have rapidly expanding flame fronts that quickly overwhelm resource capabilities to defend the vast WUI.

What is the total length of Santee's existing WUI and how has that changed since 2000?

What was Santee Fire Department's total staffing and emergency response times in 2000 and how has that changed?

What will be the total length of the WUI for the project and Santee as a whole if approved?

O7-28

6.1 Defensible Space/Fuel Modification Zones

"It has been reasoned by fire officials conducting after-fire assessments that damage to the structures built to the latest codes is likely from unmaintained flammable landscape plantings or objects next to structures or open windows or doors (Hunter 2008)." [2020 FPP p. 85]

<sup>5</sup> <https://elementalreports.com/kpcc/2018/12/10/new-houses-build-to-fire-code-burned-down-anyway-in-southern-california-2017-thomas-fire/>

<sup>6</sup> <https://www.sacbee.com/news/california/fires/article227665284.html>

newer homes were lost so all new homes are vulnerable when there are so many factors that are not accounted for in the northern California fires that would be present and enforced at the project site.

**O7-27:** The comment requests measurements of the WUI areas on the project site and throughout the City and suggests these areas are quickly overwhelmed during wildfires. The City's WUI would expand incrementally with the addition of the proposed project. The area already includes WUI due to the existing development that abuts the project site on the south and east. The new WUI associated with the project site is within this existing WUI area, so essentially is already accounted for, particularly given the fire protection system that would be employed that is designed to reduce firefighting resources for structure protection so that it can be focused on areas that include more vulnerable neighborhoods.

**O7-28:** The comment accurately quotes the FPP (2020) (Appendix P1). The comment refers to cluster burns. Please see response to comment O7-22 for a comprehensive discussion regarding the FPP's (2020) (Appendix P1) approach to protecting the proposed project from cluster burn.

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O7-28  
cont.

"...there is no guarantee that compliance with these standards would prevent damage or destruction of structures by fire in all cases." [2020 FPP p. 87]

"Further, it is well-established that firebreaks and fuel breaks placed in open space areas do little to slow a wind-driven wildfire (Syphard et.al. 2011, Keeley 2016) and create invasive species issues (Merriam et.al. 2006, 2007)." [2020 FPP p. 98]

The FPP does not even consider the potential for a cluster burn carried by adjacent high-density structures. Fire accelerates rapidly upslope. In other words, fire runs up where water runs down. It only takes one of these tightly packed structures above a fire chimney to ignite a chain reaction burn. Items such as lawn furniture, BBQs or a breakdown in housekeeping could be the trigger.





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6.1.1.4 Zone 2 – Retain 30% of Vegetation (50 to 100 feet wide)

- \* Zone 2 includes the following key components:
- \* Zone 2 requires a minimum of 70% **thinning or removal of plants**, focus on removing the most flammable species, and dead and dying plants while creating a mosaic of shrub groupings.
- \* Zone 2 consists of low-growing, fire resistant shrubs and groundcovers with an average height less than 24 inches.
- \* Grasses between shrub groupings would be cut to 4 inches in height.
- \* Ground cover between shrub groupings to be maintained less than 6 inches high.
- \* Trees and tree-form shrub species that naturally grow to heights that exceed 4 feet would be vertically pruned to prevent ladder fuels.
- \* Maintenance including ongoing removal and thinning of dead/dying shrubs.
- \* Plant species introduced or to remain in Zone 2 would not include prohibited or highly flammable species (Refer to Appendix F).

Where, for a large subdivision in chaparral fuel under the above prescription, has Zone 2 been maintained for a period of 10 years or more?

07-29

The prescription for Zone 2 represents a massive amount of work that is not feasible to perform over the long-term. Eventually it will be fudged and then ignored.

It subjects the landscape to significant adverse impacts from erosion and significant impacts to sensitive wildlife species.

The standard approach for Zone 2 (still difficult to implement over time) is to reduce total volume of biomass by 50% relative to the adjacent natural landscape.

“Zone 2: Area between 50 to 100 feet from the structure. Native vegetation may remain, but it must be thinned by 50% when the parcel is compared to the natural wildland setting adjacent to it.” [CAL FIRE / SD County Defensible Space compliance checklist. Reference San Diego County Ordinance 10147 / PRC 4291]

Furthermore, SDC Ordinance 10147 Section 68.406(a) requires plant root structures to remain in tact to prevent erosion and the height of weeds and annual grasses to not exceed 6 inches. (a) “leave the plant root structure in tact to stabilize the soil and prevent erosion...” (b) “Re-planting may be required for erosion control.”

The 50% thinning of fuel volume approach allows more fire resistant plants to naturally out compete easily ignited flash fuels that regularly invade disturbed soils as would occur under the new code.<sup>7</sup>

The City of Santee received testimony regarding the vulnerability that would be established by its new Zone 2 ordinance. However, the City chose to disregard the expert testimony and approve it without further research.<sup>8</sup>

<sup>7</sup> Dudek uses the 50% prescription in an FPP for the “Lone Oak Road Project” 2015, p. 35.

<sup>8</sup> Expert testimony provided by Van Collinsworth to the Santee City Council, Item 7, November 13, 2019. [Minutes 11/13/2019]

**07-29:** This comment details questions specific to FMZ 2. Please refer to response to comment O7-19 regarding the 70 percent thinning in the 50 to 100 feet wide Zone 2 areas. FMZs with thinning zones that have been maintained for over 10 years occur throughout Southern California, with 4S Ranch, Cielo, The Crosby, Castle Creek, and Emerald Heights providing local examples. Success over the long term lies with an active fire authority that has the experience and personnel to carry out inspections. Realizing that not all fire agencies have the personnel to conduct these types of inspections, or do not have the capacity, the FPP (2020) (Appendix P1) mandates that twice annual FMZ inspections will occur by an HOA funded third party that reports back to the Santee Fire Department. This provides the assurance that the HOA conducts the specified maintenance and that it is completed throughout the year, instead of once annually as it is in most communities.

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**6.2.1 FMZ for Existing Communities**

“The Fanita Ranch HOA will provide and maintain a 100-foot wide thinning zone where existing fuels are maintained in a low fuel state consistent with a Zone 2. Grasses will be mowed to six inches and shrubs thinned to maintain spacing and overall fuel loads at Zone 2 levels (See Section 6.1.1.4).” [p. 74]

**The extensive existing WUI has not been maintained consistent with this standard.**

Photographs off of Halberns Boulevard and Cuyamaca Street taken on May 14, 2020 demonstrate the difficulty of keeping the Fanita WUI in a state of compliance.



Fanita WUI @ Halberns Blvd. May 14, 2020



Fanita WUI @ Cuyamaca Street, May 14, 2020

**O7-30:** The comment provides May 2020 photos of a portion of the project site indicating areas with vegetation growth. The comment tries to compare the current FMZ prior to the proposed project being constructed to the future condition under the proposed project. However, this is not an equal comparison because the current FMZ is voluntary and occurs when brought to the attention of the owners (usually with Santee Fire Department annual abatement notices) while with the proposed project, it would be mandated, funded, and enforced in perpetuity.

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6.2.3 Roadside Fuel Modification Zones

Individuals trapped by gridlock and forced to shelter in vehicles or escape on foot would be subjected to potentially fatal smoke inhalation and radiant heat. A distance of 4x flame length is needed to prevent injury (not accounting for potential convective activity).



For example, utilizing the FPP assumption of 66 feet flame length in chaparral adjacent roads would require 264 feet clearance radius and 528 feet clearance diameter. More extreme input variables require greater clearance. 100 feet flame lengths x 4 = 400 feet radius x 2 = 800 feet diameter.



07-31

**07-31:** The comment confuses firefighter safety zones where firefighters in protective gear could seek open air safety due to the setbacks of 4-times the flame length. Applying this to a road situation is not appropriate. The photographs provided in the comment indicate narrow roads in steep terrain with fuels that would not be allowed along the proposed project's roads. For example, the burned Italian Cypress and pine trees in the photos would not be allowed as they are prone to ignition. The proposed project evacuation roads are wide and include additional lanes for egress and are bordered by roadside FMZs that are 50 feet wide on either side. This width of roadside buffer exceeds code requirements and provides an area where flame lengths and fire intensity would be reduced. Evacuations are carried out more precisely in San Diego County and the reader is referred to the Thematic Response – Evacuation for more details. In summary, it is a short distance from the proposed project to developed areas of the City. The potential exposure of evacuees along evacuation routes is not similar to northern California areas burned in 2016 through 2018 that required long distances of travel through unprotected and exposed routes before reaching urban areas.

8 Cumulative Impact Analysis

07-32

The FPP fails to disclose and consider the quantity and impact of an expanded WUI.

The FPP fails to discuss the impacts of accelerating climate breakdown upon potential fire behavior in the fire corridor where it proposes to place over 8,000 individuals with related structures.

9.2.2 Firefighter Response during Wildfire

Without considering the growth of WUI in the city, region and state and the stress upon resources that is common during multiple wind driven events, the FPP makes a commitment for service availability that cannot be assured.

07-33

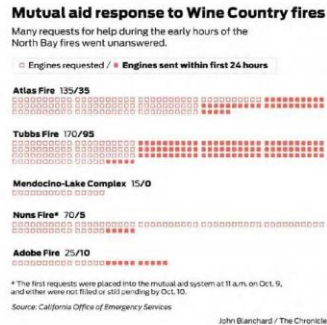
*"During a large, regional wildfire, the City assures response from its fire stations, including the on-site station. During a large wildfire, there would be several or more fire agencies providing resources including CAL FIRE with its full complement of ground and aerial attack capabilities. San Diego County includes a significant wildfire response resource with equally as significant experience pre-planning, coordinating, and attacking wildfires that would all be available to the Project area, as needed."* [FPP 2020 p. 99]

This is another reversal from FPP 2007 [AR 018511, 12].

*"...there can be no assurance that any of these engine companies will be in their stations when multiple wildfires are occurring throughout southern California such as occurred during 2003 Cedar Fire event. On high/extreme fire danger days, there are often multiple starts and engine companies are often already deployed on other incidents."*

In fact, some resources, even if not deployed elsewhere, become grounded due to high winds and extreme fire behavior. No firefighter signs up for or is knowingly sent on a suicide mission.

07-34



**07-32:** This comment states that the FPP (2020) (Appendix P1) fails to disclose and consider the quantity and impact of an expanded WUI and the impacts of accelerating climate breakdown of potential fire behavior. The FPP (2020) (Appendix P1) addresses cumulative impacts in Section 8 and concludes that the proposed project’s high level of defensibility along with additional fire response resources for the proposed project and any new cumulative projects address potential impacts. There is no failure to address an expanded WUI, as addressed in response to comment 07-27.

**07-33:** The comment challenges the Santee Fire Department’s commitment to assuring response from its fire stations. The concept of backfilling stations where the engine company has been assigned to a wildfire and limiting commitments out of the area are primary components that enable the Santee Fire Department to assure its resources will be able to respond.

**07-34:** This comment appears to be referencing a graphic titled “Mutual Aid Response to Wine County Fires.” This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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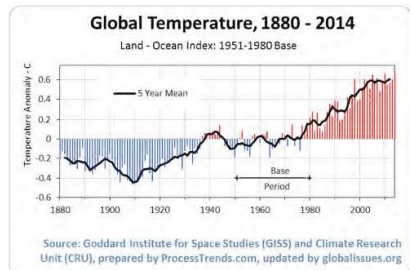
9.2.3 Fire Behavior Modeling and Fuel Modification Zones

The FPP makes several errant assertions in section 9.2.3:

“The 2007 FPP used a very aggressive fire behavior model known as a FM 4. This model is known to dramatically overestimate fire behavior and is not applicable to most of the fuels found on the site (Weise and Reggelbrugge 1997).

The 2007 FPP modeling calculated worst-case fire condition flame lengths of 95 Feet in the site’s heaviest fuels. The 2020 FPP utilizes FM 4 in specific areas where that type of fuel would occur at a climax condition when allowed to accumulate. The updated modeling resulted in worst-case flame lengths of approximately 66 feet in the site’s heaviest fuels during extreme fire weather. Differences in the modeling outcomes are related to wind speeds used in the modeling effort (the fuel moisture values used in both FPPs are the same). The 2007 FPP utilized 60 mph 20-foot wind speeds. The source of the wind speed data used in the 2007 FPP is not cited and is therefore unknown. The 2020 FPP utilized wind speed values established by San Diego County. These County standards identify appropriate wind speed inputs that are based on maximum-recorded wind speeds and an analysis of 99th percentile wind speeds from local remote automated weather stations (RAWS). The Peak wind values identified in the County standards (and used in the 2020 FPP) are the highest wind speeds recorded by a RAWS during the 2003 Cedar Fire.” [p. 99]

1. The 2007 FPP appropriately used FM4 for the chaparral in the northeast portion of the site and utilized other fuel models for other portions of Fanita. **The 95 feet flame length estimated is reasonable and under estimates the intensity in more severe low humidity and high wind conditions.** [AR 018490 “...flame length usually exceeding 100 feet.”]
2. The Cedar Fire does not represent the highest potential wind speeds. Higher wind speeds can and have been generated even if those wind speeds did not result in a major regional fire.
3. The Camp Elliot RAWS data cited by the FPP is halfway between the project site and the Pacific Ocean, at a different elevation and with a different geographic formation. These are significant differences when considering potential wind speeds, humidity, etc.
4. The FPP makes the false assumption that climatic conditions are constant. It ignores documented trends for greater extremes in weather and fire behavior.



Source: Goddard Institute for Space Studies (GISS) and Climate Research Unit (CRU), prepared by ProcessTrends.com, updated by globalissues.org

O7-35

O7-36

**O7-35:** The comment provides an opinion that the fire behavior modeling in the FPP (2020) (Appendix P1) does not use correct inputs. The opinion is not supported by any factual fire behavior data, experience, or examples other than referring to the previous project’s 2007 FPP prepared without the benefit of the Southern California specific fuel models that more accurately represent actual fire behavior predictions. Please note that fire behavior modeling in San Diego County follows guidelines that include utilizing remote automated weather stations, of which the Camp Elliot station is the nearest site and is considered similar to the project site. Experienced fire behavior analysts adjust the inputs based on the specific site conditions, primarily vegetation now, at climax condition, and in the FMZs, wind, temperature, and humidity as well as slopes, aspect and other categories. Dudek’s fire behavior analysts spent considerable time using their professional judgement and experience to apply the correct fuel models and other inputs. Differences between the 2007 fire behavior modeling and FPP (2020) (Appendix P1) modeling are detailed in Section 9 of the FPP (2020) (Appendix P1).

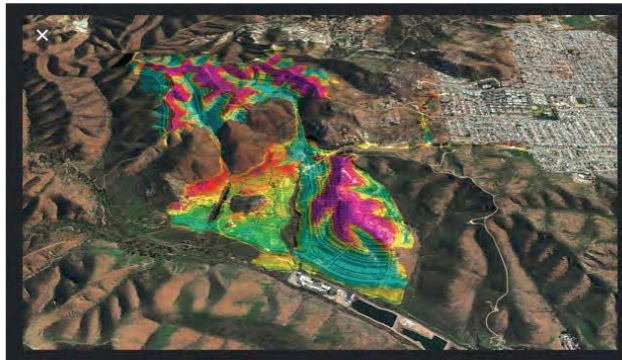
**O7-36:** This comment provides a graphic of global temperatures over time. Please refer to response to comment O7-6 and Thematic Response – Fire Ignition and Risk for details on how climate change is addressed. In addition, it is important to note that according to the commenter’s

opinion (see comments O7-35), increased fire hazard would occur at the project site, which would result in more fires and more aggressive fire behavior. In fact, if climate changed per the comment's suggestion, and more frequent fires occurred at the project site, the shrub vegetation would quickly convert to flashy fuels (as the commenter notes in comments O7-19 and O7-20). Flashy fuel dominated landscapes may be more prone to ignitions, but the resulting wildfires are less intense and produce much lower flame lengths than shrub fuels, on the order of 3 to 5 times or more shorter flame lengths in flashy fuel landscapes. Therefore, the comment confuses the long-term impact of climate change and refutes previously referenced research that indicates that impacts in Southern California shrublands are expected to be significantly less than in higher elevations.

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9.2.4 Susceptible Project Design

An aerial of the 2020 project design reveals structures located above numerous fire chimneys required to evacuate over roads subject to flame lengths exceeding 100 feet.



*“The 2007 FPP was based on a land plan that included peninsulas of development surrounding by wildland fuels. This situation leads to a higher risk of fire encroachment than if there is one managed exposure and where developed areas are wider with more space between native fuel areas.*

*The 2020 FPP is based on a land plan that excludes narrow islands and peninsulas of development and includes contiguous developed areas that form fuel breaks by converting wildland fuels to managed landscapes and ignition resistant structures.” [p. 99]*

It is agreed that the 2007 land plan was a susceptible project design. However, the 2020 plan still places susceptible development above FM4 fire chimneys on the north and eastern exposed interfaces. This significant impact to public and firefighter safety should be avoided by removing the northeast island of development.

07-37

**07-37:** The comment agrees that the 2020 project design corrects vulnerabilities that were included in the 2007 project but mentions that the 2020 project design still includes vulnerabilities. The FPP (2020) (Appendix P1) specifically evaluates the terrain, fuels, and its fire potential. Where terrain would facilitate fire spread toward the developed areas, specific FMZ customizations were developed to provide additional buffer to mitigate the more aggressive fire behavior. There is no significant impact to the public or firefighters based on the proposed site plan, as suggested by the comment. The developed areas are congregated in large areas void of vegetation pathways that could facilitate wildfire into the community. Large, maintained buffers occur around the proposed project to keep active fire away from the community. Ignition-resistant structures and maintained landscapes throughout the interior of the proposed project protect against airborne embers. The concern presented by the comment is actually addressed through the FPP (2020) (Appendix P1) and Santee Fire Department requirements.

9.2.5 Evacuation Plan

O7-38

More than half of the “Vineyard Village” home sites of the northeast island require evacuation in the direction of Santa Ana winds that may carry thick smoke and embers ahead of the fire front. Late evacuation could result in panic with injuries due to atmospheric conditions alone.



O7-39

Appendix B-3 FlamMap Fire Behavior Post Development, Fall Fire Flame Lengths documents flames of at least 40-50 feet on the north and 60+ on the south of the two access routes to/from the northeast development island. Radiant heat impacting these routes could be lethal if utilized during fire activity.

The Evacuation Plan is generic and overly simplified. Specific issues follow.

**Wildland Fire Evacuation Plan for Fanita Ranch Community**

O7-40

The analysis does not attempt to consider the impact of varying ignition points upon evacuation routes and surges in traffic volumes. Nor does it consider the impacts of limited visibility due to smoke, embers and darkness.



**O7-38:** The comment indicates that late evacuations would be potentially dangerous. The proposed project’s Wildland Fire Evacuation Plan (Appendix P2) states a similar conclusion, but not only for the proposed project, but also for any existing community. Late evacuations are inherently dangerous because the active fire area is close to people. The proposed project’s FPP (2020) (Appendix P1) and Wildland Fire Evacuation Plan (Appendix P2) have considered this and developed a contingency plan for the scenario where a fire ignites close to the proposed project. Normally, a distant wildfire would enable the typical phased evacuation of areas that may result in vehicle congestion, but that has ample time to move vehicles out of designated areas. In a short-notice event, there is usually no alternative to proceeding with an evacuation. However, for the proposed project, the ability to begin evacuating people from designated areas and then halt the evacuation and temporarily shelter people in their protected homes or in the village core, for example, would be available to emergency managers, giving them more flexibility and a contingency safety net that is not available to older, more vulnerable construction neighborhoods. Although the preferred approach will always be to evacuate and evacuate early, having a contingency provides another level of fire safety.

**O7-39:** The comment is accurate regarding potential flame lengths adjacent to the referenced road. Evacuations



occurring when active fire is burning in the referenced area would not be advised, and the proposed project's contingency plan for on-site sheltering would be considered by decision makers managing the evacuation as a safer alternative. Again, this contingency is not available to all neighborhoods, but would be available to the proposed project and any new master planned community built to the same fire safety specifications. The comment provides an opinion regarding the evacuation plan without providing specifics and requires no response.

- O7-40:** This comment states the analysis does not consider the impact of varying ignition points on evacuation routes and surges in traffic volumes. There is currently no policy, regulation, or requirement for a proposed project to provide an evacuation plan. The proposed project's Wildland Fire Evacuation Plan (Appendix P2) is meant to inform future residents of the potential actions that are available and what they may be directed to do during a wildfire emergency. Please refer to the Thematic Response – Evacuation for more details regarding evacuation planning and execution in Santee and San Diego County.

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**O7-41:** The comment raises several evacuation-related concepts. Evacuations are managed by law enforcement personnel and they would not refer to a project-specific evacuation plan. Please refer to the Thematic Response – Evacuation for additional details regarding evacuation planning and execution.

O7-41

Traffic studies have not considered the need for existing homes to evacuate on the same circulation network required by the project.

Substantial traffic volumes from both the project and existing development have been ignored in regard to evacuation requirements.

Affected populations tend not to respond to evacuation warnings until late in the evacuation period, leading to likely gridlock from weaker portions of the circulation network during late surges in evacuation response.

The feasibility of evacuating at either AM or PM peak commute hours has not been considered.

Time and logistics to evacuate special needs residents has not been considered.

The impact of attempting to evacuate with recreational vehicle trailers and motor homes has not been considered.

The emotional state of drivers has not been considered.

Road capacity can be diminished by any or all of these factors to restrict circulation.

What contingencies are there, if any, should evacuating drivers abandon gridlocked vehicles and attempt to flee on foot?

The analysis fails to consider any evacuation scenarios for the project based upon footprint, ignition points, and topographical vulnerabilities for full or partial evacuations to any or all safety zone capacities/locations required.

07-42	<p><b>1.2 Register to Receive Emergency Alerts</b></p> <p>The Reverse 911 AlertSanDiego system is an important communication tool. A weakness is the potential for late notice or the public <u>reliance upon an official alert that may not arrive</u>. Individuals have perished in California's mega-fires that waited for official notice rather than understanding and acting upon their own situational awareness. The proximity of SR-67 east of the site and the potential for ignitions from SR-67 during Santa Ana winds has the potential to make Reverse 911 ineffective.</p>
07-43	<p><b>3.2 The Evacuation Coordination Process</b></p> <p>Considering the potential for total gridlock of ingress/egress, who will be providing transportation assistance for those who need it and how will they be identified?</p> <p>As stated, at 3.3 "...wildfires igniting nearby, may occur with little or no notice and certain evacuation response operations will not be feasible... Evacuation assistance of specific segments of the population may also not be feasible."</p>
07-44	<p><b>3.3.1 Evacuation Points and Shelters</b></p> <p>This section is too generic. It fails to identify and map specific sites that meet the general criteria and consider under what fire scenarios with time-of-day traffic expectations these safety zones may or may not be feasible "points and shelters." What safety zones work and what evacuation scenarios do not work under severe fire weather conditions from various ignition points?</p> <p>Where are the closest animal shelters and who operates them?</p> <p>What animals would they accept or deny?</p> <p>What capacity is available for emergency temporary shelter?</p>
07-45	<p><b>3.3.2 Shelter in Place</b></p> <p>Shelter in Place may be utilized in the "situation where that alternative is determined to be safer than evacuating."  <i>[Tubbs Fire devastation 2017, Santa Rosa, CA]</i></p>



**07-42:** This comment details the weaknesses of the Reverse 911 AlertSanDiego system. The emergency alert program is a successful program with robust capabilities to provide messaging to large numbers of people. This program is supplemented by various other means of notification using social media, television, radio and others. The potential for ignitions off of SR-67 is a valid concern during a Santa Ana event. This potential for ignition was contemplated in the FPP (2020) (Appendix P1) and the Wildland Fire Evacuation Plan (Appendix P2) and is an example of a scenario where an evacuation notice may be provided and evacuation started and then halted if the fire encroaches upon the proposed project. As explained in response to comment O7-38 and in the Thematic Response – Evacuation, the proposed project would be capable of providing a temporary safe shelter in this scenario.

**07-43:** This comment asks who will be providing transportation assistance for those who need it and how will they be identified. Per the San Diego County Emergency Operations Plan Evacuation Annex, transportation assistance is available through pre-registering with the appropriate entity. Please refer to the Thematic Response – Evacuation for more details on emergency evacuations, notifications, and short-notice events.

**07-44:** This comment states the Evacuation Points and Shelters section is too generic. The Wildland Fire Evacuation

Plan (Appendix P2) Section 3.3.1 is deliberately generic because shelter points are identified during an actual emergency event. Determining potential shelter points pre-event cannot be verified. Shelter points for evacuees and pets/animals would be determined prior to an evacuation order. Further, determining safety zones is a fire operations responsibility during a fire event. The site provides numerous opportunities for fire fighter safety zones, but they are not pre-designated in the Wildland Fire Evacuation Plan (Appendix P2) because it will not be referred to by the agencies managing an evacuation.

- O7-45:** The comment provides generic photos of burned homes but neglects to provide details regarding the structures' pre-fire construction and ignition resistance, landscape maintenance, FMZs and ember resistance. Based on the photos, it is clear to an experienced fire protection planner that ember penetration and older construction led to the damage shown in the photos. It is a layered fire protection system, such as the one that the proposed project would implement, that defends against the type of large structure loss identified in the photos. The comment posits questions regarding evacuations and traffic congestion and again mentions cluster burns. Please refer to the Thematic Response – Evacuation for details on evacuation and its execution and management by law enforcement, fire and emergency management agencies. Refer to response to comment O7-22 regarding cluster burns.

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O7-45  
cont.

The fortified examples pictured demonstrate this "situation" may not be safe at all, but individuals may be left without any other choice. Will gridlock on Mast Boulevard and the 2 connections to the project site ensure that Shelter-in-Place is actually the only survival strategy executed?

What areas of the project site are more and least susceptible to cluster burns? Once identified, how will that susceptibility variation impact Reverse 911 or other evacuation notice and phasing?



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4 Fanita Ranch Evacuation Road Network

"... most human fatalities from wildfires are due to late evacuations when evacuees are overtaken on roads..." (p. 19)

It should be noted the routes required to access and exit the site (Cuyamaca Street and Fanita Parkway) create a "U" configuration that relies upon Mast Boulevard to function. Mast Boulevard fails now during commuter hours, especially during the school year. What strategy addresses these facts?

Mast Boulevard should be studied under worst-case scenario fires to determine if completion to Lakeside for connection to SR-67 would mitigate risk or heighten it due to induced traffic from Lakeside avoiding SR-52 congestion. Mitigation should be required when its effectiveness is confirmed by a study.

"Road infrastructure throughout the United States, and including San Diego County is not designed to accommodate a short-notice, mass evacuation (FEMA 2008). The need for evacuation plans, pre-planning, and tiered or targeted and staggered evacuations becomes very important for improving evacuation effectiveness." (p. 19)

Considering the facts stated above, why has the project massively increased the population allowed over the constraints of Santee's existing General Plan?

Why are the most vulnerable portions of the site selected for habitation with high-density housing with greater cluster burn potential homes than the housing prescribed in the Santee General Plan with lower risk of cluster burns? Damage assessment research has documented homes with separation of  $\geq 45$  feet are less vulnerable to cluster burns. [IBSH, Megafires: The Case for Mitigation]



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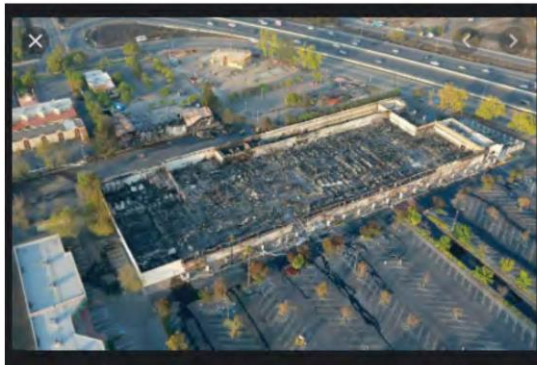
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**O7-46:** This comment asks what strategy addresses the transportation issues on Mast Boulevard. Please refer to the Thematic Response – Evacuation for details on vehicle flow, intersection control, and evacuation management for responses to the comment’s questions.

**O7-47:** The comment poses several questions regarding cluster burns (refer to response to comment O7-22) and evacuations from perimeter areas to the Village Center. Note that the entire project site would be capable of providing temporary shelter during a wildfire event if evacuation was considered compromised. In some scenarios, perimeter homes could be evacuated to the Village Center, or they may be directed to remain in their protected homes. It is estimated that the maximum time to travel from the perimeter to the Village Center would be less than 3.5 minutes once wheels are rolling, assuming a reasonable driving speed. The project site includes considerable ability to park vehicles along internal roads, parking lots, and driveways.

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- 07-47  
cont. | What is the population density of perimeter homes discussed relative to the capacity of the “internal areas” of the Fanita Commons Village Center identified as a shelter when evacuation is not feasible before the fire front arrival?  
How long would it take to evacuate perimeter homes to the Commons Village Center?  
How much available parking space is there and how does that relate to the number of perimeter and other homes targeted for potential evacuation?
- 07-48 | What is the procedure for school evacuation and to where?  
Will school be cancelled on red flag days?
- 07-49 | What is the impact of and procedure for Public Safety Power Shutoffs (PSPS) affecting the site and traffic signals?  
Will there be micro-grids with on site energy storage?
- 07-50 | Under what fire scenario is the Village Center at risk [large shopping areas protected by freeways still burned in Santa Rosa, 2017 Tubbs Fire].



- 07-51 | What is the estimated time required to evacuate the entire Fajita Ranch project with 8,000 plus residents? How does that change based upon time of day, commutes and school sessions?  
How will the school be evacuated? How will the potential panic during ingress and egress be dealt with when parents try to reach the school to get their children?

**07-48:** This comment inquires what the procedure for school evacuation is and where and asks if school will be cancelled on red flag days. Schools are required to prepare their own Emergency Response Plans. Typically, they follow a three-step process that includes (1) early dismissal, (2) evacuation, or (3) shelter in place. Each action would be evaluated by the school’s administration and appropriate measures would be put in place, including bus availability, parent notification procedures, and shelter in place protocols. It is beyond the scope of the proposed project’s FPP or environmental documents to determine if the school would be closed during Red Flag Warning periods.

**07-49:** This comment inquires what the impact is and procedure for Public Safety Power Shutoffs and if there will be micro-grids with on-site energy storage. Public Safety Power Shutoff is completely managed by San Diego Gas & Electric, which can turn power off to specific areas to minimize fire ignitions. Note that the proposed project will underground all electrical lines and the distribution lines that are the highest wildfire igniter will not cause ignitions as they will be subterranean. A large evacuation would include law enforcement control of downstream intersections. Therefore, signals that may not be functioning in a power shut off event would be managed by law enforcement.

- O7-50:** This comment asks under what fire scenario is the Village Center at risk. The Village Center would be located within a large fuel modified landscape and would include the same ember protections provided to all of the proposed project's buildings. There may be wildfire conditions that result in smoke, ash, and airborne embers throughout the site, including the Village Center, but the fuel beds available to the embers and their typical decay rates would minimize the likelihood of a sustained ignition. The ember-resistant vents would also minimize the potential for a structure fire and the enhanced fire sprinklers in Village Center buildings would be capable of protecting lives and property should a fire occur.
- O7-51:** This comment asks what the estimated time required to evacuate the project site, how the school would be evacuated, how it would affect the ability to evacuate existing residents, what the fuel conditions and potential flame lengths for street segments and intersections required for evacuation. Please refer to the Thematic Response – Evacuation regarding the evacuation process and estimated evacuation timeframes. Please refer to response to comment O7-48 regarding school evacuations. It can be assumed that there would be additional time needed to evacuate existing residents with the addition of the proposed project, but implementation of evacuation strategies including phased approaches,



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O7-51 cont.	<p>How would a need to evacuate the Fanita Ranch project site impact the ability to evacuate the existing wildland urban interface adjacent to the project under moderate to severe fire weather conditions?</p> <p>The project would subject current levels of congestion to another 25,000+ vehicle trips/day. In an emergency evacuation scenario, the gridlock created can be life threatening.</p> <p>The DREIR has not only, not fully disclosed this impact in the context of wildfire emergency evacuation, but has reached an errant conclusion that the project "would not result in inadequate emergency access." [4.16-111] What is this statement based upon?</p> <p>What are the fuel conditions and potential flame lengths for street segments and intersections required for evacuation?</p>
O7-52	<p>While additional access would be created, the DREIR should consider how that access with an additional 25,000+ vehicle trips per day would disrupt circulation for emergency purposes.</p> <p style="padding-left: 20px;">"Current levels of congestion in the AM and PM peak periods affect the reliability of service on this freeway and delay travel times. Heavy congestion on SR-52 has a ripple effect on surrounding roadways, degrading conditions and increasing overall congestion in the region. Future traffic projections indicate that these conditions will worsen unless improvements are implemented on SR-52." [DREIR 4.16-98]</p> <p>The DREIR considers 66 intersections, 64 street segments and 7 freeway segments.</p> <p>Conclusions include significant adverse impacts to 12 intersections, 6 street segments and 2 freeway segments. Cumulative impacts increased the numbers to 15 intersections, 8 street segments, while 2 freeway segments remained significantly impacted.</p> <p>Even with 30 prescribed mitigation measures, many "impacts to these [6] intersections, [5] street segments, and [2] freeway mainline segments <u>would remain significant and unavoidable.</u>" [DREIR 4.16-100]</p> <p><b>Santee's heavily impacted circulation network will be significantly more vulnerable during wildfire emergency evacuation. This significant adverse impact must be considered and disclosed.</b></p>
O7-53	<p>In the time since the Appeals Court confirmed the Superior Court decisions on fire safety impacts in 2012, California has repeatedly broken records for the largest, most deadly and most damaging wildfires. These subsequent events serve to confirm the court decisions in real time.</p>

intersection control, and preparedness training helps minimize potential impacts. Downstream intersections are within developed/urban landscapes and would not pose direct flame exposure issues.

**O7-52:** The comment poses several evacuation related questions, but intermingles average daily trips with evacuation conditions. Please refer to the Thematic Response – Evacuation for details regarding evacuations. It is not appropriate to compare average daily trips with an evacuation traffic surge. Evacuation events are managed events with law enforcement actively moving vehicles through downstream intersections on a basis of moving those at highest risk first.

**O7-53:** The comment provides an observation regarding California wildfires since 2012. The statement is not entirely accurate in that many of the wildfires since 2012 occurred within the same footprints that they occurred previously, with the only difference being the presence of unprepared, improperly planned and protected growth. For example, wildfires have also certainly occurred in the areas surrounding Paradise and Santa Rosa. Indeed, the 2017 Tubbs Fire followed in almost exact same footprint as the 1964 Hanley Fire. What differed from 1964 and 2017 was the amount of fire-prone homes that were built in the area. Had these homes been built with fire-resistant materials such as required by Chapter 7A of the California

Fire Code, and including the ember resistant vents the proposed project would be mandated to use, it is highly unlikely that the level of damage would have been the same. Similarly, 13 significant wildfires occurred in the last 20 years around the community of Paradise, yet there seemed to be little mitigation to reduce the risk there; when the 2018 Camp Fire ignited under extreme weather conditions, a massive ember storm easily ignited older homes, which then caused a chain reaction of structure-to-structure ignitions.

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O7-54	<p><b>6 Fanita Ranch Evacuation Procedures</b></p> <p>The plan fails to consider any evacuation scenario specific to Fanita topography, project design arrangement and its dependent circulation system. The section is completely inadequate. The Wolshon and Marchive paper referenced is not specific to Fanita. A generic prescription for more lead-time with traffic control to prevent simultaneous exits is too general to determine if these goals could be implemented in any specific emergency. The threat is too great to omit a specific study.</p> <p>What defines the “orderly, pre-planned evacuation process” envisioned?</p> <p>What constitutes a trigger on a “conservative threshold?”</p> <p>How great a “time allowance” is required and in what situations, including worst-case scenarios?</p> <p>How many officers are needed for traffic control and where? Where are the safety zones and escape routes for these officers for worst-case scenarios?</p> <p>What is the contingency when no traffic control officers are available or the threat precludes their deployment? Or when cluster burns force simultaneous evacuation?</p> <p>“Fanita Ranch is not considered a vulnerable community.” This assumption is reckless, irresponsible and without substantial evidence. It ignores the record of growing California fire destruction since 2007. The built in assumption of invulnerability undermines the entire plan.</p>
O7-55	<p><b>6.1 Fanita Ranch Evacuation Baseline</b></p> <p>How will the Evacuation Plan or project achieve the compliance “of all residents and guests within the boundaries of the Fanita Ranch Community...to adhere to the principals and practices of the “READY! SET! GO!” Program”?</p> <p>Since “it is imperative that each household develop a plan that is clearly understood by all family members,” will such a plan be mandatory for completion prior to occupancy? Who will be responsible for proper completion of the plan and making sure that it is understood? Will there be a pass/fail test administered? What are the potential consequences of confusion?</p> <p>Since “it is imperative that the “READY! SET! GO!” information be reviewed on a routine basis along with accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones, who will be responsible for the review’s completion?”</p> <p>Will there be monthly, quarterly or annual project evacuation drills?</p> <p>Who will be responsible for preparing “accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones”?</p> <p>Shouldn’t this evacuation plan consist of accurate and timely updated “accompanying maps illustrating evacuation routes, temporary evacuation points and pre-identified safety zones? If so, where are they?</p> <p>The evacuation plan map on the cover of the plan that is repeated on the interior [Figure 2] is too general and speculative regarding the connections to be the sole evacuation map. Specific maps with corrected accurate connections consistent with build-out of the development phases and roads should be provided, including a specific accurate map immediately.</p>

**O7-54:** The comment poses several evacuation related questions requesting additional details and analysis. The level of detail and specifics requested in the comment are not appropriate for a project-specific evacuation plan. Please refer to the Thematic Response – Evacuation for details regarding evacuation planning and execution in Santee and San Diego County. Regarding the Wildland Fire Evacuation Plan’s (Appendix P2) statement that the proposed project would not be considered a vulnerable community, the statement is based on the litany of fire protection features and capabilities of the proposed project compared with older, less defensible, less ignition-resistant communities in the vicinity. Therefore, the statement is accurate and Santee Fire Department concurs through its acceptance of the FPP (2020) (Appendix P1).

**O7-55:** As presented in the Wildland Fire Evacuation Plan (Appendix P2), the educational outreach on Ready, Set, Go will be managed by the HOA. Details will be determined prior to occupancy and in conjunction with the Santee Fire Department. Training and resident outreach will occur through a variety of methods including annual outreach, open meetings, the community website, and mailers. The community members will be regularly reminded of their obligations to understand their responsibilities during an evacuation. The evacuation maps provided in the Wildland Fire

Evacuation Plan provide road networks at a high level because during an evacuation, messaging will be provided that indicates which routes are recommended. In the absence of direct messaging, it is important for residents to have familiarity with the major routes out of the area, and that is what is accomplished with the provided evacuation route map.

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O7-55 cont.	<p>The generic Figure 2 map included in the Evacuation Plan is based upon presently inaccurate and speculative connections. Evacuation plan maps should be clarified based upon when connections will occur and consider how the phased population increases will interact with existing populations under different worst-case scenarios. The Figure 1 Vicinity Map is also too vague.</p>
O7-56	<p><b>6.2.1 Safety Zones</b></p> <p><b>“The definition for a safety zone includes provisions for separation distance between the firefighter and the flames of at least four times the maximum continuous flame height.”</b></p> <p>This rule of thumb cited at p. 28 does NOT account for convective activity (such as fire whirls and fire tornadoes) that could impact the site selected for a safety zone.<sup>9</sup> [AR II:10129036-37]</p> <p>The assumption that interior neighborhood roads could be utilized as safety zones assumes the area would not be subjected to convective activity and that the wildland fire does not transition into an urban fire with high-intensity cluster burns. One weak link, such as a home with an open or broken window could compromise interior neighborhood roads.</p> <p>The assumption that a 66-foot tall flame length is a worst-case scenario that can be used to calculate safety zone requirements is not correct. The northeast portion of the site contains chaparral vegetation that can exceed flame lengths of 100-feet under extreme weather conditions and increasing maturity. [2007 FPP @ AR II:6:28596, II:6:28606, II:6:28607, AR 018490 “... flame length usually exceeding 100 feet.”]</p> <p>The northeast portion of the site - “Fanita Mountain” also contains numerous chutes / fire chimneys oriented with Santa Ana wind driven fires and proposed development.</p> <p>Thus, the conclusion (p. 29) “...identified safety zones may not be feasible due to distance, location, fire behavior, etc.” is <u>correct</u>.</p>
O7-57	<p><b>6.2.2 Temporary Firefighter Refuge Areas</b></p> <p>The discussion of TRAs attempts to psychologically leverage developed portions of the site into protection for firefighters and residents. Reliance upon TRAs would subject individuals to higher risk of failure, injury and death. A TRA is something that can provide some temporary shielding from radiant or convective heat. TRAs may or may not be effective as fire intensity grows, fire behavior changes and time available for shielding varies.</p> <p>While firefighters may use TRAs to leverage aggressive tactics while experiencing the emotional pressure to rescue life or property, TRAs are not suitable for residents with any other feasible alternative. TRAs are required when there is no other option and must be utilized because of a deteriorating situation that precludes the ability to travel on a predetermined escape route to a safety zone.</p> <p><sup>9</sup> The Car Fire tornado reached wind speeds of 165 mph, temperatures of 2,700° F. In 40-minutes it had a mile long path of destruction. <a href="https://www.youtube.com/watch?v=YvFDBoDitvQ">https://www.youtube.com/watch?v=YvFDBoDitvQ</a> And <a href="https://www.wired.com/video/watch/extreme-events-fire-tornado">https://www.wired.com/video/watch/extreme-events-fire-tornado</a></p>
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**O7-56:** The comment provides opinions on firefighter safety zones and their feasibility on the site and is consistent with the Wildland Fire Evacuation Plan (Appendix P2) in recognizing that there are many opportunities for safety zones, but safety zones are ultimately selected by firefighters when on-scene during a wildfire and are based solely on the wildfire’s location and behavior. Some potential safety zones may not be appropriate in some scenarios, but in these scenarios, there will be other safety zones available. There is not lack of potential safety zones within the project site at build out.

**O7-57:** The comment provides opinions and cited information regarding temporary refuge areas. The comment is not in conflict with the Wildland Fire Evacuation Plan (Appendix P2) but recognizes that temporary refuge areas are a last resort and are better suited for fire fighters than residents.

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O7-57 cont. *“Important: Do not use a structure or apparatus TRA as a substitute for identifying and utilizing viable escape routes and safety zones. Only use a structure or apparatus TRA if escape routes to safety zones have been compromised.”*

*...During wildland/urban interface (WUI) fires, it’s become an all-too-common occurrence for firefighters to take greater risks when defending civilians and assets. Although no fire agency suggests taking extraordinary risks, firefighters have a natural tendency to push the envelope when lives and structures are threatened...*

*In short... a TRA is not a replacement for an identified safety zone; it is merely a temporary, short-term solution that firefighters can use when needed.”*

*Fire Rescue, Issue 9, Volume 7, 7/17/12  
Jerry Burke and Kelley Gouette*

O7-58 **7 Limitations**  
*“During extreme weather conditions, there are no guarantees that a given structure will not burn or that evacuations will be successful...” (p. 36)*  
 Again, so why place residents on the riskiest portions of the site at higher densities than the General Plan allows?

O7-59 **Appendix B Fire Behavior Analysis**  
**[B-7] Table 3 BehavePlus Fine Dead Fuel Moisture Calculation**  
*“Dry Bulb Temperatures 90-109 deg F” underestimate peak temperatures for the site that approach 120°F.*  
**[B-7] Table 4 Weather Variables From County of San Diego Standards**  
*“20-foot Wind Speed 19 mph ... 41 mph” underestimates peak winds for the site.*

O7-60 *At [B-6-8] the Fire Behavior Analysis discusses the Camp Elliot RAWS weather data relative to County of San Diego standard weather guidelines. By making this comparison, the analysis errantly suggests that using the County Standards in the modeling presents a conservative analysis. The suggestion is false. Camp Elliot is about halfway between Fanita and the Pacific Ocean with significant geographic differences. The mountainous portion of Fanita is over 600-feet higher in elevation while the Sycamore Canyon is over 1 00-feet lower in elevation. Camp Elliott is a mesa subject to higher maritime influence while Fanita has diverse topography subject to higher inland temperatures and wind patterns. Furthermore, the County standard guidelines underestimate potential weather extremes at the Fanita site. As the earth’s energy balance is increasingly disrupted by anthropologic GHG emissions, further weather extremes that would intensify fire behavior can be expected.*

O7-61 **The DREIR has errantly concluded that Wildfire impacts are not significant.**

- O7-58:** The comment quotes limitation language from the Wildland Fire Evacuation Plan (Appendix P2) and asks why build on the site’s riskiest areas. Please refer to the Thematic Response – Fire Protection and Safety for details regarding hazard vs risk and mitigation of that risk.
- O7-59:** Please refer to responses to comments O7-13 and O7-35 regarding differences in fire behavior inputs expressed by the commenter’s opinion. Of the factors that affect fire behavior, temperature is the least influential and is not a consideration for declaring Red Flag Warning days. Humidity and wind are the dominant weather factors affecting fire behavior. All inputs in the proposed project’s fire behavior modeling were carefully evaluated and utilized acceptable ranges used commonly in San Diego County.
- O7-60:** The commenter’s opinion is noted, but it is attempting to discredit the fire behavior modeling conducted for the proposed project with very little basis. The Camp Elliot Remote Automated Weather Station (RAWS) is the closest to the site and based on its location, is a good representation of the average site conditions (with some project site elevations higher and some lower than the RAWS site). Please refer to responses to comments O7-13 and O7-35 regarding fire behavior specialist qualifications and experience. The City disagrees that

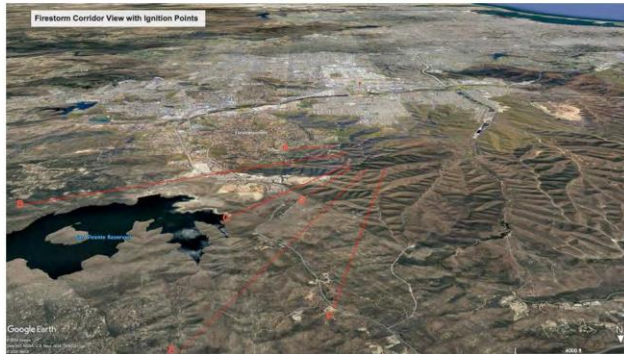
minute changes in the inputs would have any material effect on fire behavior modeling outputs.

- O7-61:** The comment states an opinion without specific supporting facts and therefore, does not require a direct response. However, please refer to the Thematic Response – Fire Protection and Safety regarding the FPP’s (2020) (Appendix P1) evaluation and conclusions and the Appendix P1 for details regarding significance conclusions and supporting analysis.

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O7-62

What are the rate of spread calculation results for the BehavePlus4 fire runs created in FPP 2020? What are the differences in these results compared to FPP 2007 rate of spread calculations for worst-case fall and summer fire runs?



Please answer the following questions for ignition points A-F for a wind-driven fire pushed to a top speed of "17 mph."

Also, please answer the following questions for ignition points A-F for a wind-driven fire pushed to a top speed of "1,966.5 feet/minute [AR II:6:28670] consistent with utilizing FPP 2007 inputs to the BehavePlus fire behavior model.

How long would it take for the fire to travel to the project site assuming failed or no initial attack with the winds aligned directly from the ignition points to the project site?

O7-63

For a 4:00 AM ignition:

- What are the ranges of time expectations for the fire to be reported?
- What are the ranges of time expectations for the emergency operations center to evaluate the report and dispatch response units?
- What are the ranges of time expectations for response units to the ignition points or associated vantage points to provide a fire size up?
- Upon receiving a fire size-up, what are the range of time expectations for Emergency Operations to determine the developed areas at risk?
- Once a threatened area has been identified for evacuation, what are the ranges of time expectations for activating the Alert San Diego reverse 911 system.
- What back-up alert system exists in cases of reverse 911 system failures?
- What are the ranges of time expectations for evacuating the entire project site?
- What are the ranges of time expectations for evacuating the northeast "Vineyard Village"?

**O7-62:** The comment requests comparisons between the 2007 and 2020 FPPs in terms of fire behavior modeling, specifically fire spread rates. The commenter is referred to Section 4.1.12 of the FPP (2020) (Appendix P1) where it indicates fire spread rates using the Southern California specific fuel models and to 2.3.1 of the 2007 FPP, which indicates fire spread rates using the less accurate, over predictive original fuel models.

**O7-63:** This comment, along with comments O7-64, O7-65, O7-69, and O7-70, asks the City to model fire spread and answer questions on fire response and evacuation scenarios from (a) a multitude of ignition points, (b) under various different rates of spread and windspeeds, (c) within 6 different time windows.

Under the CEQA Guidelines, a lead agency is not required to conduct every test or perform all research, study, or experimentation recommended or requested by commenters. Furthermore, while the EIR must evaluate the potential wildfire impacts, this evaluation need not be exhaustive. Rather, the sufficiency of an EIR is considered in light of what is reasonably feasible.

As discussed more fully in Thematic Response – Evacuation and the Wildland Fire Evacuation Plan (Appendix P2), there are a number of variables at issue when modeling fire behavior and measuring



corresponding response and evacuation times, and it is infeasible to account for every potential scenario.

In an effort to account for evacuation in a range of fire situations, the Wildland Fire Evacuation Plan (Appendix P2) for the proposed project discusses community readiness and in Sections 1.1 through 1.4, provides a quick reference for future proposed project residents so that they are familiar with the potential for evacuations and various actions they may be asked to take. Section 1.2 provides information and a link for residents to sign up for emergency alerts so they receive emergency messaging, which will assist in their early notification. The remainder of the Wildland Fire Evacuation Plan (Appendix P2) provides information pertaining to the typical evacuation process, the evacuation road network, and evacuation procedures. The information in the Wildland Fire Evacuation Plan (Appendix P2) is designed to assist evacuation efficiencies by creating an aware community that is ready to go when directed to do so, or remain in their homes if considered safer than evacuating. Further, the FPP (2020) (Appendix P1) in Section 6 provides a detailed discussion of the site's Fire Safety Requirements including defensible space, infrastructure and building ignition resistance. In Section 5, the FPP evaluates the ability to provide fast emergency response throughout the proposed project, with modeled results indicating all proposed project

structures are within 4 minutes travel time from the on-site fire station. The system of protections consider the fire environment and the type of wildfire it may produce, and provide for evacuation or temporary on-site refuge in protected buildings or designated areas.

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- O7-63 cont.
  - What are the ranges of time expectations for evacuating the northwest "Orchard Village?"
  - What are the ranges of time expectations for evacuating the established WUI from Cuyamaca Street to West Hills Parkway north of Mast Boulevard?
  - What are the range of time expectations for evacuating the northeast Vineyard Village, Orchard Village and the established WUI from Cuyamaca Street to West Hills Parkway north of Mast Boulevard?
  - Where are the safety zones for evacuations of threatened structures and what are the escape routes available to reach any safety zone identified?
  - What are the dimensions and capacities of any safety zone identified?
  - The FPP suggests the use of Temporary Refuge Areas. Where are the TRAs and what are the characteristics of any TRA identified? What are the limitations of any TRA identified/suggested and how much radiant heat would make the suggested TRA inadequate?
- Please answer the same series of questions above for ignitions during AM commuter hours.

Please answer the same series of questions above for ignitions during PM commuter hours.
- O7-64
 

Please answer the same series of questions above for ignitions during daylight off commuter hours.

Please answer the same series of questions above for ignitions during nighttime off commuter hours.
- O7-65
 

Please answer the same questions above for a fire originating 17 miles to the northeast of project structures?

Under all of the fire scenarios listed above, how will the public make a decision on whether to shelter or evacuate.

What are the trigger points that the public will use to determine whether to shelter or evacuate?
- O7-66
 

For each evacuation route, what are the adjacent fuel types?

For each evacuation route and fuel type identified, what are the flame heights projected using BehavePlus calculation with worst-case fire behavior input variables?

For each evacuation route, what is the distance from the road to the end of the FMZ? Or what is the distance from the natural fuels to the road for each side of the road?
- O7-67
 

What is the result if and individual by vehicle or foot is burned over while traveling on the routes identified?

What is the result if an occupied vehicle is burned over while gridlocked on the routes identified?
- O7-68
 

Retired Cleveland National Forest Supervisor Dr. Anne Fege states at [AR II:149:29379]:

*"Since evacuation is apparently City policy, road configuration changes within the subdivision can clearly increase fire safety. Emergency evacuation of the project "in a reasonable amount of time using safe routes" is undefined. Rock Point [Now identified as Vineyard Village] is vulnerable to ignitions at the SR-67 corridor within 10 minutes or less under high velocity Santa Ana winds. Evacuation routes are vulnerable to direct flame impingement, radiant heat and smoke. City reference to "safe routes" for evacuation is unsupported and incorrect."*

- O7-64:** This comment asks the same questions as comment O7-63 regarding the AM commuter hours. Please refer to preceding response to comment O7-63 for a response to this comment.
- O7-65:** This comment asks the same questions as comment O7-63 regarding the PM commuter hours. Please refer to preceding response to comment O7-63 for a response to this comment.
- O7-66:** The comment questions how the public will make decisions during an emergency, what evacuation or on-site sheltering trigger points are, what evacuation route fuel types are, and their corresponding flame heights, and the setbacks from fuel to roads. The Wildland Fire Evacuation Plan (Appendix P2) and Thematic Response – Evacuation, provide details regarding evacuation planning and implementation in the City and San Diego County. The public would not be expected to make the decision to evacuate or remain on site or what the trigger point is. These are responsibilities of law enforcement and fire/emergency service agencies. These public safety professionals would notify residents via alert messaging, social media, television, radio and/or in the field messaging regarding the appropriate actions. The Ready, Set, Go program described in Appendix P2 and the City's/County's protocols are applicable in any scenario, including those described in the comment.

- O7-67:** The comment provides hypothetical scenarios and requests information regarding burnover of vehicles or pedestrians. Although not considered likely based on the City and San Diego County evacuation protocol that avoids late evacuations, particularly when the community design offers the ability to temporarily shelter on site, the speculative scenarios presented in the comment would typically be managed by responding agencies and emergency personnel. No further response is required.
- O7-68:** The comment poses a question regarding evacuation from the previous project’s “Rock Point” area. This comment is quoting a submitted comment directed at an outdated and inapplicable EIR and its related fire protection and evacuation plans. Please refer to EIR Section 4.18.7 and FPP (2020) (Appendix P1) Section 9, which describes the differences between the 2007 and 2020 FPPs. The proposed project’s Vineyard Village, in the general area of the prior project’s “Rock Point,” was specifically evaluated for fire environment and appropriate fire protection features were required, including extended FMZs. Vineyard Village would meet or exceed all City-required enhanced fire ignition-resistant building codes and provide for the other elements of fire protection, including water, fire apparatus access, secondary access, and ongoing maintenance and monitoring.

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O7-68  
cont.

Considering the answers to the series of questions above for the same ignition points, from the city's perspective, what in the present project has changed from Dr. Fege's conclusions in regard to similar development of the "Rock Point"/"Vineyard Village" portion of the project?

O7-69

With a worst-case Santa Ana wind aligned, for an ignition in the San Diego River watershed approximately 22 miles northeast of the project, please answer the same series of fire safety questions above.



O7-70

**For a fire with an onshore flow worst-case scenario wind, please answer the same series of questions above.**

The DREIR fails to present substantial evidence to support its conclusion that wildfire impacts are insignificant. In fact, data is presented within the DREIR that contradicts a conclusion of insignificant impacts. The stubborn determination to embed housing in rugged fire explosive topography defies reason.

O7-71

Without making a clear finding, the apparent inability to evacuate the project site rapidly puts the burden upon residents to shelter in place regardless of the voracity of the impending firestorm. California's record-breaking megafires have demonstrated this approach results in loss of life and property. These devastating fires have also resulted in a new awareness of harsh realities from fire professionals and planners.

Pete Parkinson, AICP and California president of the American Planning Association has spoken out strongly about the failure of the exact approach the Fanita Project relies upon. Parkinson's conclusions are attached and should be recognized by all those involved in project design and decision-making. [Northern News October 2018]

**O7-69:** Please refer to response to comment O7-63 for a response to this comment.

**O7-70:** Please refer to response to comment O7-63 for a response to this comment.

**O7-71:** The comment provides an opinion regarding the EIR's wildfire impact conclusions. Please refer to the Thematic Response – Fire Protection and Safety for details regarding the basis for hazard identification, risk analysis, and fire protection requirements, which informed the significance conclusions. Provided references to the American Planning Association California President are noted but are not substantiated with key facts regarding the ignition and ember resistance of the residences lost in the Northern California wildfires. The commenter is directed to response to comment O7-53 and Thematic Response – Fire Protection and Safety for differences between the newest structures that were lost in the referenced events in comparison to the restrictive requirements that would be mandated at the proposed project.

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O7-71  
cont.

Key points:

Of 5,600+ homes destroyed during the Tubbs Fire, 3,000 were lost within the city limits. 1,300 were NOT considered to be in a wildfire hazard zone.

Chapter 7A building code and shelter in place strategies do not offset the risks of placing residents in harms way.

*"...Relying on a hardened structure to protect whole communities in a known fire-prone area is the height of hubris and callousness. In Santa Rosa's Fountain Grove neighborhood, homes that were built to WUI standards appeared to fare no better than those built before those standards... Sheltering in place is a last resort, not a "plan."*

*... we cannot engineer our way out of every hazard...*

*Increasing density in rural, fire prone areas increases the likelihood of a catastrophic fire... The fire hazards in some areas of our state are simply too great to allow additional residential development... As planners and as local government decision makers we thought we had anticipated the hazards and planned accordingly. We were wrong... we trained and exercised for scenarios we thought were "worst-case." We were wrong about that too."*

O7-72

The DREIR has failed to disclose or understand the significant hazards to life and property created by the project as proposed, including to the established WUI.

O7-73



*An aerial view of homes that were destroyed by the Tubbs Fire on October 11, 2017 in Santa Rosa, California. (Photo: Justin Sullivan/Getty Images)*

**O7-72:** The comment provides an opinion regarding the EIR’s understanding and disclosure of potential fire hazards. Please refer to the Thematic Response – Fire Protection and Safety for details regarding the basis for hazard identification, risk analysis, and fire protection requirements that informed the significance conclusions.

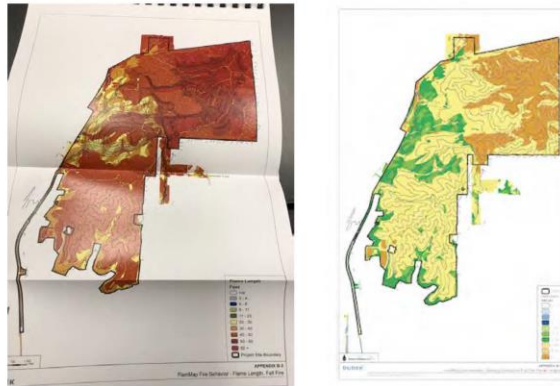
**O7-73:** The comment provides a photograph of multiple destroyed homes in the 2017 Tubbs Fire but does not provide a question or comment. No specific response is required, but the commenter is referred to the Thematic Response – Fire Protection and Safety for details on how the proposed project is different from the areas affected by the Tubbs and Paradise Fires.

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Appendix B-2 FlamMap Fire Behavior – Flame Length, Fall Fire

Compare Administrative Draft Appendix B-2 to Appendix B-2.

07-74



Why has the housing overlay and all red flame color been removed from the map and legend of Appendix B-2?

The color palette selected and the removal of the housing overlay appears to be an attempt to veil the significant hazards. The flame lengths have also been reduced versus FPP 2007. What would these maps look like without diminishing 2007 input variables and the color contents?

**07-74:** This comment asks why the red flame color has been removed from the map and legend of Appendix B-2 to the FPP (EIR Appendix P1). The differences between the draft Appendix B-2 and the final Appendix B-2 are related to presentation clarity. The draft exhibit color scheme (particularly the various shades of red and orange) made it difficult to delineate landscape level changes between flame length projections. The revised color palette, which is very similar to the Appendix B-2 summer fire conditions, is more understandable, for example, where the higher flame lengths would be realized on the site. There is no effort to veil significant hazards. Rather, the updated color scheme is intended to provide a clearer understanding of where the higher hazard areas on the property occur.

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O7-75	<p><b>4.1 Aesthetics</b></p> <p>The Fanita range of hills and mountains in northern Santee set the scenic backdrop for the entire city and adjacent jurisdictions. The views are invaluable. Lenses and photo simulations chosen veil the significant unavoidable impacts of the project by the demolition of the Fanita mountaintop to construct "Vineyard Village."</p> <p>The DREIR should revisit these impacts and disclose them.</p>
O7-76	<p><b>Section 4.2: Air Quality</b></p> <p>The project would have significant and unavoidable air quality impacts and should be denied. [4.2-21, 25]</p> <p>Santee residents are already subjected to heavy concentrations of wind blown dust from operations of the massive Sycamore Landfill. New sources of dust are a significant health hazard.</p> <p>What surveys have been done to test for Valley Fever in soils targeted for grading? How would a positive identification for Valley Fever be addressed?</p>
O7-77	<p><b>4.3 Biological Resources</b></p> <p>Fanita is a state park quality resource in both scenery, wildlife and resources. The land is highly constrained by rugged topography, by its geographic isolation and limited circulation access. The natural urban growth boundary created by the steep slopes leaves the interior walled from the noise and visual impacts of urban development and highways to the south. Fanita allows endangered wildlife to thrive and those that venture onto the historic Stowe Trail the opportunity to experience nature in a setting that turns back time to remind us of the grandeur in the natural San Diego now lost.</p> <p>We carry forward our objections to the destructive adverse impacts to Fanita species. Our comments appear in the record at [AR 008221-008224, 088227-008231, 015208, 019898-020121, 020122-020132, 027873-027907, 027908-027937, 029026-029242, 029355-029377], [G8 46 12=10-2018, G8 55 12-15-2018]</p>
O7-78	<p>Wildlife surveys are dated. The Hermes coppery butterfly is now listed as endangered and the USFWS designated critical habitat on Fanita. This is significant new information. How does the project footprint / housing arrangement intersect in critical habitat acreage impacts? New wildlife surveys should be performed and the DREIR recirculated.</p>
O7-79	<p>How is the project being processed and why? What permits are required?</p> <p>Will the project seek a Federal 10A Permit?</p> <p>Will the project seek a Section 7 Permit?</p>
O7-80	<p>Will the project be consistent with a <b>FINAL</b> MSCP subarea plan?</p> <p>When will the subarea plan become final and why is the project requesting approval prior to the subarea plan?</p>
	<p style="text-align: right;">35</p> <p style="font-size: small; text-align: center;">9222 Lake Chanyon Road, Santee, CA 92071 Tel/Fax (619) 258-7929 SaveFanita@ccoc.net LD#980429 PreserveWildSantee.org</p>

**O7-75:** The comment states that the hills and mountains on the project site set the scenic backdrop for the City and the photosimulations provided in the EIR veil the Vineyard Village portion of the proposed project. The comment further states that the EIR should revisit these impacts and disclose them. Section 4.1, Aesthetics, analyzes the potential visual impacts of the proposed project from 16 key viewpoints (KVPs). Nine of the KVPs (KVP-1, KVP-2, KVP-3, KVP-6, KVP-7, KVP-11, KVP-14, KVP-15, and KVP-16) contain views of the proposed Vineyard Village. As explained in more detail in Appendix B of the EIR, through the use of GPS data, coordinate information, photographs and combined with sophisticated computer modeling software, the photosimulations were designed to show accurate representations of the proposed project. As illustrated from these KVPs, the proposed project would alter the existing aesthetic characteristics of the project site, as well as the existing landform in certain areas from a variety of vantage points in the City and adjacent areas. To protect and manage hillsides and topographic resources, the City has adopted hillside development guidelines as described in Table 4.1-1, City of Santee Hillside Development Guidelines. The large cut and fill slopes on the project site, as identified on the Vesting Tentative Map, that are visible from the public rights-of-way would use landform grading techniques to recreate



and mimic the flow of natural contours and drainages in the natural surroundings. Where development is proposed on hillsides, grading would be efficient to minimize the grading footprint. Special contour grading techniques would be used at edges and transitions in landform. During construction, these slopes would be temporarily devoid of vegetation; however, they would be revegetated and landscaped in compliance with the Santee Municipal Code, Chapter 12.26, Landscape and Irrigation Regulations, and the Guidelines for Implementation of the City of Santee Water Efficient Landscape Ordinance (2017). By complying with the policies in the Santee General Plan and the requirements of the Santee Municipal Code, as well as adhering to the guidelines set forth in the Fanita Ranch Specific Plan, the EIR concludes that the proposed project would not degrade the existing landscape from a public viewpoint. This issue is adequately addressed in the EIR.

- 07-76:** The comment focuses on potential Valley Fever impacts related to construction, stating that the proposed project should be denied, and asking if Valley Fever in the soils has been assessed. Valley Fever is a disease caused by the sores of *Coccidioides* fungus. The City has considered the potential for *Coccidioides* fungus to occur to during construction of the proposed project, particularly as it may occur during construction in the northern half of the project site in Vineyard Village, Fanita Commons, and Orchard Village. A more detailed discussion of the City's consideration of potential Valley Fever impacts has been added to Section 4.2.5.2,

Threshold 2: Cumulative Increase in Criteria Pollutant Emissions in the EIR in response to the comment, and the Air Quality Analysis in Appendix C1 of the EIR has been supplemented with a Valley Fever Technical Report (Appendix E).

The California Department of Public Health, the County of Los Angeles, the County of San Diego all recommend watering topsoil prior to and during earth disturbance in order to reduce airborne dust emissions and the spread of *Coccidioides* spores. *Coccidioides* fungus thrives in arid environments. Without water the *Coccidioides* fungus eventually desiccates into spores. Watering during earth disturbance activities significantly reduces airborne spores and the ability of workers to inhale spores, which is the route of infection.

The proposed project is required to implement the dust control measures listed in compliance with the SDCAPCD Rule 55, which prohibits discharges of visible dust emissions into the atmosphere beyond the property line for periods longer than 3 minutes in any 60 minute period. SDCAPCD also requires use of any of the following or equally effective trackout/carry-out and erosion control measures that apply to the project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; use of secured tarps or cargo covering, watering, or treating of transported material for outbound transport trucks. With implementation of these regulatory requirements,

impacts related to *Coccidioides* for both onsite and offsite adjacent uses would be less than significant.

Section 4.2.5.1 of the EIR includes Mitigation Measures AIR-1 (Rule 55 Dust-Control Measures) memorializing what is required under SDAPCD Rule 55. Mitigation Measure AIR-1 includes provisions requiring that visual fugitive dust emissions monitoring shall be conducted during all construction phases. Visual monitoring shall be logged. If high wind conditions result in visible dust during visual monitoring, this demonstrates that the measures are inadequate to reduce dust in accordance with SDAPCD Rule 55, and construction shall cease until high winds decrease and conditions improve. In addition, the EIR includes AIR-2 (Supplemental Dust-Control Measures) that will reduce fugitive dust emissions even further and the chance of causing *Coccidioides* fungus spores to become airborne.

Though impacts related to Valley Fever would be less than significant, in response to the comment, Mitigation Measure AIR-2 has been revised to provide additional clarification on the precautions that would be carried out to reduce the likelihood of Valley Fever even further.

**AIR-2: Supplemental Dust-Control Measures.** As a supplement to San Diego Air Pollution Control District Rule 55, Fugitive Dust Control, the applicant shall require the contractor to implement the following dust-control measures during construction. These measures shall be included in project construction documents, including the

grading plan, and be reviewed and approved by the City of Santee prior to issuance of a grading permit.

- The construction contractor shall provide to all employees the fact sheet entitled “Preventing Work-Related Coccidioidomycosis (Valley Fever)” by the California Department of Public Health and ensure all employees are aware of the potential risks the site poses and inform them of all Valley Fever safety protocols, occupational responsibilities and requirements such as contained in these measures to reduce potential exposure to Coccidioides spores.
- Apply water at least three times per day at all active earth disturbance areas sufficient to confine dust plumes to the immediate work area.
- Apply soil stabilizers to inactive construction areas (graded areas that would not include active construction for multiple consecutive days).
- Quickly replace ground cover in disturbed areas that are no longer actively being graded or disturbed. If an area has been graded or disturbed and is currently inactive for 20 days or more but will be disturbed at a later time, soil stabilizers shall be applied to stabilize the soil and prevent windblown dust.
- Limit vehicle speeds on unpaved roads to 20 mph unless high winds in excess of 20 mph are present, which requires a reduced speed limit

of 15 mph. Vehicle speeds are limited to 30 mph for onsite haul roads that are paved with gravel to suppress dust or where visual dust is watered and monitored frequently enough to ensure compliance with SDAPCD Rule 55.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

- O7-77:** This comment describes the proposed project as a “state park quality resource in both scenery, wildlife and resources” and lists records of comments. The City acknowledges that the commenter values the project site and objects to the proposed project. The comment does not raise any issue related to the adequacy of any specific section or analysis of the EIR; accordingly, no specific response can be provided or is required. The City will include the comment as part of the Final EIR for review and consideration by the decision makers prior to a final decision on the proposed project. No further response is required or necessary.
- O7-78:** This comment states that the wildlife surveys are dated. Surveys for the project site date back to 1989, with updates to surveys and site conditions occurring throughout recent years. The most current focused surveys for special-status wildlife species were conducted in 2016 and 2017. Although these surveys

were conducted 3 to 4 years ago, preconstruction nesting bird surveys, western spadefoot (*Spea hammondi*) relocation, and topsoil removal for preservation of San Diego fairy shrimp (*Branchinecta sandiegonensis*) would be conducted on the project site to avoid impacts to special-status wildlife species during construction and to enhance the Habitat Preserve after construction is complete. Additionally, by including the previous surveys (i.e., those surveys conducted prior to 2016/2017) in the proposed project's impact analysis, the EIR provides a more comprehensive dataset of the special-status species present on the project site.

The comment is incorrect when it states that Hermes copper butterfly (*Lycaena hermes*) is listed as endangered. Hermes copper butterfly is federally listed as a Candidate species. The EIR discloses the proposed project potential impacts to Hermes copper butterfly in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-status Species, under the subheading Sensitive Wildlife Species. This section of the EIR includes a summary of the USFWS-designated Critical Habitat for Hermes copper butterfly in the project area and identifies the potential proposed project impacts to Critical Habitat for Hermes copper butterfly. Refer to the Appendix D, Biological Resources Technical Report, Section 5.1.4.3 and Figure 5-4, for details regarding the proposed project impacts to Hermes copper butterfly critical

habitat. Also refer to Appendix D, Biological Resources Technical Report, Table 5-5c, Impacts to Vegetation Communities and Land Cover Types within the Proposed Hermes Copper Butterfly Critical Habitat Areas, which summarizes the vegetation communities impacted in the proposed Critical Habitat area on the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- 07-79:** This comment includes a series of questions regarding the process for permits and approvals required for the proposed project; however, no specific environmentally related permit or wildlife species is identified, except the question regarding a “Federal 10A Permit” and a “Section 7 Permit.” As noted in Section 4.3.2.3, Local, in the EIR under subheading Draft Santee Multiple Species Conservation Program Subarea Plan, “if the Draft Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit.” This is also disclosed in Section 3.12, Discretionary Actions, which lists “U.S. Fish and Wildlife Service: Endangered Species Act – Section 7 Consultation or Section 10(a) Incidental Take Permit” as a potential discretionary action. However, those permits arise under the FESA and are not directly related to the evaluation of environmental impacts in the

EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- O7-80:** This comment includes two questions regarding the consistency of the proposed project with a future Final Santee MSCP Subarea Plan and asks when the Draft Santee MSCP Subarea Plan will be finalized. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. Nonetheless, the proposed project is currently in compliance with the Draft Santee MSCP Subarea Plan. It is unknown at this time when the Draft Santee MSCP Subarea Plan will be finalized, and it would be speculative to identify when the plan would become final because it is ultimately up to the discretion of the City Council and wildlife agencies to approve or deny the plan. The Final Santee MSCP Subarea Plan and Implementing Agreement would be provided to the public as a part of its environmental review process, which is separate from the proposed project. The proposed project is not reliant on the completion of the Draft Santee MSCP Subarea Plan. The EIR provides mitigation to reduce impacts to less than significant in accordance with CEQA requirements. Although the Draft Santee MSCP Subarea Plan has not yet been



approved or permitted, it is still used as the guidance document for projects occurring in the City. Therefore, the EIR is also consistent with the Draft Santee MSCP Subarea Plan, which would serve as an HCP pursuant to Section 10(a)(1)(B) of FESA and as an NCCP Plan pursuant to the California NCCP Act of 1991. However, because the Santee MSCP Subarea Plan is still a draft and is not complete, the EIR cannot rely on the protections of the plan. Therefore, if the Draft Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit; however, take authorization is not a CEQA issue.

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07-81	<p>Please disclose the comments of the Wildlife Agencies on the Santee draft MSCP subarea plan.</p> <p>Please disclose all Wildlife Agency letters and comments on the current project application.</p> <p>What is the status of the Wildlife Agency review of the draft MSCP Subarea Plan and Implementing Agreement? Please provide current drafts of both the Implementing Agreement and the Subarea Plan.</p> <p>What is the status of the Wildlife Agency review of the current project in the context of any permits required?</p>
07-82	<p>Why isn't the 2018 Subarea Plan Administrative Draft provided for review? Fanita is the foundation. Please provide it and explain the unresolved issues relative to the project. The City now has a long record of revising drafts for developers' private negotiations with the Wildlife Agencies/City and withholding "Administrative Drafts" from the public [AR II:147:29351, II:238:35867-35893].</p>
07-83	<p>Where is the 210-acres of occupied California Gnatcatcher Habitat west of I-15 to be acquired that is needed to mitigate for CAGN impacts on Fanita, as previously requested by Wildlife Agency letter?<sup>10</sup></p>
07-84	<p>Santee's 2003 General Plan update promised completion of the Subarea Plan simultaneous with the approval of the Sky Ranch project that swallowed up and exceeded all of Santee's 5% interim take allowance of coastal sage scrub habitat under the 4(d) rule while the plan was being "processed." Therefore, small landowners have not been able to utilize the 4(d) interim allowance. The City's attempt to process another large landholding without completing the Subarea Plan constitutes bad faith to small landholders, to the public, to the environment and it is illegal. This issue alone requires additional analysis and recirculation of the DREIR.</p> <p>Approval of the Fanita Ranch project prior to final approval of a MSCP Subarea Plan and Implementing Agreement violates the nearly two-decade old Santee General Plan, which states at 9.4:</p> <p style="padding-left: 20px;"><i>"The City has prepared a draft Multiple Species Conservation Program Subarea Plan that will, through an Implementation Agreement with the Resource Agencies, grant "take" authority to the City of Santee. This will streamline the environmental review process."</i></p> <p>In introductory portions of the DREIR, including biological Appendix T, etc., half-truth propaganda is presented as facts to give the reader a false impression that the current unit count requested by the applicant is reasonable. Information that does not exist in the Administrative Record, specifically, an ancient County of San Diego General Plan prior to the incorporation of the City of Santee is used to suggest Fanita was designated for "approximately 14,000 units." The section's go on to mention the limit in Santee's initial General Plan, but fail to discuss that every time the Santee City Council took action to amend the Fanita guidelines the city council reduced the maximum allowable units.</p> <p>If the DREIR cannot present the actual San Diego County General Plan that includes the language evidence to support the unit claim and supplement that information with the other actions taken by the</p>
07-85	<p>If the DREIR cannot present the actual San Diego County General Plan that includes the language evidence to support the unit claim and supplement that information with the other actions taken by the</p>

<sup>10</sup> USFWS/CADFG, O'Rourke & Hunting, AR 1:193:018795. Wynn & Tippets, 019278-9. Bartel & Raysbrook, 019288-9, Gilbert & Tippets 019278-9. AR 029351, 35946-3549, 35971, 35943-45, 35496-35806, 35867-35893.

**07-81:** This commenter states that it would like the wildlife agencies' comments on the Draft Santee MSCP Subarea Plan and on the current project application to be disclosed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. Nonetheless, the letters cited in Comment Letters S1 (CDFW, July 13, 2020) and F1 (USFWS, July 13, 2020) for the EIR regarding both the proposed project's EIR and the Subarea Plan are included as part of the administration record, see responses to comments for Comment Letters S1 and F1 for details.

The comment then requests to know the status of the wildlife agency review of the Draft Santee MSCP Subarea Plan, Implementing Agreement, and the proposed project and requests that the Implementing Agreement and Draft Santee MSCP Subarea Plan be disclosed. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. However, it should be noted that the development of the Draft Santee MSCP Subarea Plan is not part of this project and the Wildlife Agencies have not yet processed permits for the project or for the Santee MSCP Subarea Plan (see to response to comment O7-80). As the Subarea Plan process itself is separate and

distinct from the Fanita project entitlement and environmental review process now underway, the commenter is encouraged to participate in the Subarea Plan process. A copy of the Draft Santee MSCP Subarea Plan, the Wildlife Agency Review Draft Santee MSCP Subarea Plan December 2018 was provided on the City's website as part of the administrative record for this project ([http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/Remainderpercent20ofpercent20thepercent20Record/\(2\)percent20Referencepercent20Documentspercent20frompercent20EIRpercent20&percent20Technicalpercent20Reports/Tabpercent20492percent20-percent202018-12percent20Santeepercent20SAPpercent20Wildlifepercent20Agencypercent20Reviewpercent20Draftpercent20Dec18v2.pdf](http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/Remainderpercent20ofpercent20thepercent20Record/(2)percent20Referencepercent20Documentspercent20frompercent20EIRpercent20&percent20Technicalpercent20Reports/Tabpercent20492percent20-percent202018-12percent20Santeepercent20SAPpercent20Wildlifepercent20Agencypercent20Reviewpercent20Draftpercent20Dec18v2.pdf)).

- O7-82:** This comment requests the 2018 Draft Santee MSCP Subarea Plan be provided for review. The development of the Draft Santee Subarea Plan is not part of this project. Refer to response to comment O7-80. The Wildlife Agency Review Draft Santee MSCP Subarea Plan December 2018 is included in the administrative record for this project and is available online at the City's website.
- O7-83:** This comment asks for the location of the 210-acre occupied coastal California gnatcatcher habitat west of I-15 to be acquired that is needed to mitigate for impacts.

The comment referenced apparently was submitted in connection with the prior project proposal, and relates to a previous draft EIR, not the current EIR or project. It is unclear which document the comment is referencing; however, there is an attachment to the USFWS comment letter from September 16, 2016, that states “the acquisition and conservation of 210 acres of the Montana Mirador property as mitigation for the proposed development, as included in the hardline agreement, is no longer feasible.”

As stated in the EIR (see Table 4.3-8a), impacts to coastal California gnatcatcher would be reduced to below a level of significance with implementation of Mitigation Measures BIO-1, BIO-2, BIO-14 and BIO-17. Specifically, habitat preservation would occur on-site within the Habitat Preserve. Therefore, the site identified in the comment (and in the USFWS 2016 comment letter) is not part of the project and is not needed to meet the project’s mitigation requirements. Therefore, no further response is required.

- O7-84:** This comment states that the City is no longer a participant in the NCCP interim 4(d) process and the City’s attempt to process another large landholding without completing the Santee MSCP Subarea Plan constitutes bad faith and is illegal. The comment correctly states that the City is no longer a participant in the NCCP interim 4(d) process because they have

already permitted disturbance of all of their allotted coastal sage scrub interim loss acres. In regards to the second portion of the comment, the City has prepared a Draft Santee MSCP Subarea Plan for the City's jurisdiction with the intent to ultimately streamline the environmental review process. The City acknowledges that the adoption of a Santee MSCP Subarea Plan that provides species take authority to the City would streamline the environmental process, as each individual project would not require separate Wildlife Agency permitting for impacts to listed species. However, there is no requirement that the City must adopt the Santee MSCP Subarea Plan prior to approval of a project within the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, recirculation of the EIR is not warranted.

- O7-85:** The comment questions the details included in the project background discussed in Section 2.2 of the EIR as well as Appendix D to the EIR (Biological Resources Technical Report, Section 1.2), which the comment erroneously refers to an Appendix T. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. The EIR is correct that in 1980 the project site was designated in the County of San Diego General Plan for development of approximately 14,000 residential units

(prior to the incorporation of the City). Historically, development was expected to continue northward into the project site. The 1982 Santee Community Plan includes a Land Use Element Map that divides the project site into 4 residential density categories, which, when the land area and the density ranges are taken into account, the site could yield up to 14,000 units.

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O7-85 cont.	<p>city council to amend the Fanita Ranch Essential Elements and Guidelines that further restricted densities, then the propaganda should be stricken from all documents and appendices throughout.</p> <p>Facts: November 12, 1986. Santee General Plan Fanita Ranch Essential Element No. 3 "The total number of units shall not exceed 5,500 units..." [AR 001287] The amendment adopted replaced language in Santee's first General Plan that restricted Fanita Ranch development not to "exceed 8,100 units." [AR 001336].</p> <p>The city would go on to reduce the maximum units to 3,500. The city council would act again in 1996 placing lot size limits that combined with other restrictions to put the maximum units to about 1,227.</p>
O7-86	<p>Expansion of Fanita Parkway adjacent to Santee Lakes will result in a significant road kill impact (already a problem) to mammals, birds and reptiles, especially during night and off commute hours when speeds and volumes will be higher. The DREIR has not disclosed or mitigated for this significant impact. How will the project avoid or mitigate road kill adjacent to Santee Lakes of Fanita Parkway?</p>
O7-87	<p><b>4.4 Cultural and Tribal Resources</b></p> <p>Native Americans inhabited Fanita. It appears that grinding stones and other artifacts will be directly impacted by the development. Fanita has an ancient village site or sites and there are likely burial sites that may be disturbed by the project.</p> <p>While we understand the need to protect specific locations from disclosure, the DREIR and appendices are devoid of any meaningful information to determine impacts, potential for avoidance and mitigation.</p> <p>At minimum, the specific resources impacted and avoided should be disclosed without specific locations so the interested public and decision makers might make a determination about the significance of the impacts. What are the specific archeological resource impacts?</p>
O7-88	<p>The DREIR states at [4.4-37] "consultation has not concluded." What is the current status of the Tribal consultations as required by AB 52?</p> <p>Considering that consultation with Tribal Councils have not concluded, why has the DREIR been released for public comment in a rush for project approval?</p> <p>We request that the comment period be extended to coincide with the conclusion of consultation and the recirculation of the results. This is especially important considering that the public does not get access to review and consider the significance of the resources to be impacted by the project.</p> <p>The lack of disclosure precludes the public's ability to determine if the resource impact decisions are in compliance with state and federal laws.</p>
O7-89	<p><b>4.5 Energy</b></p> <p>The DREIR fails to disclose and discuss the implication of Executive Order B-55-18 directing carbon neutrality to be achieved in California as soon as possible. Considering the DREIR chose to include a discussion of the Sustainable Santee Plan adopted almost 2 years later, the omission is a glaring flaw in the DREIR and must be remedied.</p>

**O7-86:** This comment states that expansion of Fanita Parkway adjacent to Santee Lakes will result in a significant road kill impact to mammals, birds, and reptiles. Fanita Parkway is an existing roadway that runs through an existing residential neighborhood, adjacent to Santee Lakes, and the occurrence of roadkill is an existing condition. The comment does not state which species are currently being impacted, but it is likely not special-status mammal, bird, and/or reptile species since special-status species typically do not occur in residential neighborhoods. It is equally foreseeable that additional traffic volumes may also decrease the number of animals crossing Fanita Parkway.

As disclosed in the Section 4.3.5.1: Threshold 1: Candidate, Sensitive, or Special-Status Species, subsection Indirect Impacts, as well as Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, under subheading Indirect Impacts, the proposed project has potential to result in increased roadkill. Mitigation Measure BIO-23, which requires the provision of wildlife undercrossings under Cuyamaca Street and Fanita Parkway, would reduce direct and indirect impacts to wildlife, including western spadefoot, to a less than significant level. As further detailed under the Mitigation Measures subheading in those sections, Mitigation Measure BIO-20, which employs street signs, speed bumps, or other traffic-

calming devices along the north and south collector streets to allow wildlife to cross more safely, would reduce long-term indirect impacts to wildlife movement within the Habitat Preserve to a less than significant level. Refer to Section 4.3.5.1: Threshold 1: Candidate, Sensitive, or Special-Status Species, and Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, for additional information.

- 07-87:** This comment asks for specific archaeological resource impacts. The EIR lists all resources within the project site in Table 4.4-1 and all archaeological resources are summarized to the extent possible without divulging confidential information beginning in Section 4.4.1.2. The specific resources that will be impacted, CA-SDI-8243 and CA-SDI-8345, are discussed throughout the section and addressed under Section 4.4.5.2 Threshold 2: Archaeological Resources.
- 07-88:** This comment requests an update on tribal consultation. Public Resources Code section 21080.3.1 does not require a lead agency to conclude consultation prior to release of a Draft EIR for public review, only that such consultation “begin” prior to the release of the Draft EIR. As explained in detail in Section 4.4.1.3 of the EIR (Known Cultural Resources, Assembly Bill 52 Consultation), consultation with the one tribe that requested it, Barona Band of Mission Indians (Barona), began in September 2018 - well before the release of the



EIR on May 29, 2020. After nearly two years of consultation with Barona, the parties have agreed to the mitigation measures in the EIR and conditions of project approval to address the tribe's concerns. On July 9, 2020, Barona submitted a letter to the City to this effect, with some further changes to the conditions of project approval. On July 31, 2020, the City sent a response to Barona accepting such changes and stating that AB 52 consultation has concluded. Section 4.4.1.3 of the EIR has been updated to reflect this information, as follows:

On March 9, 2020, the City emailed Mr. Bunce regarding the status of the City's January 30, 2020, request to conclude AB 52 consultation and provided a draft, template letter from Barona to the City, as requested by Mr. Bunce at the January 30, 2020, meeting. On March 11, 2020, Mr. Bunce responded via email stating that the Tribal Council was still working to organize a meeting to discuss the proposed project with two other tribal groups. On March 18, 2020, the City's attorney emailed Mr. Bunce requesting an update on the City's request to conclude consultation and followed up with Mr. Bunce via a phone call on March 24, 2020. During the call, Mr. Bunce stated that the Barona Tribal Council had yet to review the information provided during the January 30, 2020, meeting and that he estimated the Tribal Council would take an

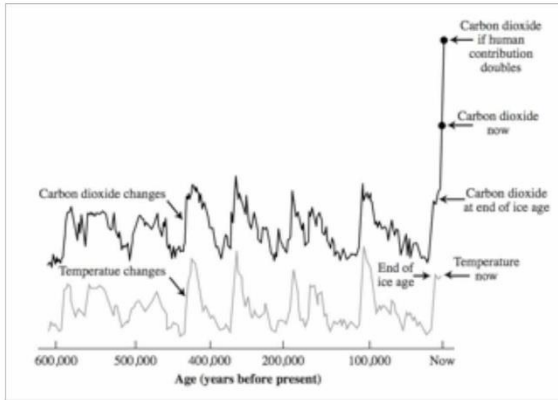
additional 2 to 12 months to respond. Since the release of the EIR for public review, the parties have agreed to the mitigation measures in the EIR and conditions of project approval to address Barona's concerns. On July 31, 2020, the City sent a letter to Barona stating that consultation has concluded.

- 07-89:** The comment alleges that the energy analysis in the EIR is flawed because it did not discuss Executive Order B-55-18, which sets a non-legislative statewide goal of net carbon neutrality (zero net emissions after offsets) by 2045. Please refer to comment 05-38, which discusses this order in the context of the GHG analysis.

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Section 4.7 Greenhouse Gas Emissions

All GHG Emissions are now significant due to accelerating climate breakdown. Note how temperature follows CO2 concentrations in the atmosphere and reference the introduction to the "Sustainable Santee Plan" - climate action plan below.



"Climate Change Devastation and Urgency To Act"

California Executive Order B-55-18 (September 12, 2018) finds that climate change is causing historic drought, devastating wildfires, torrential storms, extreme heat, the death of millions of trees, billions of dollars in property damage, and threats to human health and food supplies. EO B-55-18 sets a target to achieve carbon neutrality statewide as soon as possible and no later than 2045 while maintaining net negative emissions thereafter. Scientists agree that that worldwide carbon must start trending downward by 2020, and carbon neutrality—the point at which the removal of carbon pollution from the atmosphere meets or exceeds emissions—must be achieved by midcentury at the latest. To have a 50% chance of limiting global temperature rise to 1.5°C, we must meet carbon neutrality globally by 2050, and to have a 67% chance, the target year is 2040. Significant devastating impacts will continue if warming is limited to 1.5°C, however, the benefits of limiting warming to 1.5°C, compared with 2°C, are enormous and incalculable.

07-90

**07-90:** The comment alleges that “all GHG emissions are now significant,” followed by an uncited timeline chart and the introductory language in Executive Order B-55-18. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR.

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O7-90 cont. *To achieve carbon neutrality, massive reductions in carbon pollution and removal of carbon dioxide from the atmosphere will be required. As of October 2018, the remaining global carbon budget to have a 67% chance of limiting warming to 1.5°C was 420 Gt CO<sub>2</sub>, and to have a 50% chance, the budget was 580 Gt. In 2018, global emissions reached approximately 40.8 Gt. The IPCC explains that global emissions must quickly drop to 20 to 30 Gt annually and then drop sharply toward zero in order to stay within budget. Failure to achieve global targets will result in accelerating feedback loops with irreparable devastation to civilization and advanced life forms on the planet. Feedback loops that adversely impact the probability of limiting warming to specified targets have already been triggered and are not accounted for in the carbon budget models. Furthermore, Global GHG emissions with significant latent negative impacts to the earth's energy imbalance are still trending upward compounding the urgency to act aggressively...*

O7-91 *"Enabling climate resilience and sustainable development depends critically on urgent and ambitious emissions reductions coupled with coordinated sustained and increasingly ambitious adaptation actions (very high confidence)." Natural systems are the most cost effective means of removing carbon from the atmosphere while providing aesthetic value." [Sustainable Santee Plan]*

The DREIR downplays climate change and climate impacts of the project. Climate is not just changing; climate is breaking down at an accelerating pace. The DREIR fails to disclose the role of feedback loops and tipping points that will threaten essential resources, supplies and destabilize governments without drastic changes in cumulative human GHG emissions. Instead, the space devoted to natural emissions serves to confuse the significance of human caused emissions at both the cumulative and project levels.



O7-92 The DREIR veils climate facts by hedging with unnecessary language, such as “prevailing scientific opinion” (4.7.1) and “scientists believe” (4.7-2) rather than just stating the facts. The DREIR states human activities have caused “substantial quantities of GHGs to be released into the atmosphere”

**O7-91:** This comment provides a timeline graph of global GHG concentrations in the atmosphere and alleges that the EIR downplays climate change and climate change impacts including feedback loops and tipping points. Contrary to the statement made in the comment, Section 4.7, Greenhouse Gas Emissions, of the EIR provides a thorough and adequate analysis of the project's potential GHG emissions and determines the project would not result in a significant GHG emissions impact. The EIR therefore satisfies the requirements of CEQA.

**O7-92:** The comment claims that the EIR is hiding or downplaying facts about the climate by using terms such as “prevailing scientific opinion.” The use of these terms was intended to convey the evolving nature of climate science. However, Section 4.7 of the EIR, Greenhouse Gas Emissions, which focuses on project GHG emissions, concludes that the project would not result in a significant environmental impact based upon a clearly established GHG threshold. Therefore, no further response is required.

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O7-92 cont.	without discussing the catastrophic impacts of what are in reality massive GHG releases relative to the earth's thin and balanced atmospheric layer essential for regulating energy in and out of the system.  The DREIR uses IPCC 2013 data when using more recent data is available. It casually references projections for a 3-10.5° F temperature rise without any explanation of the significance of outcomes in that range. (4.7-1)
O7-93	By failing to disclose emissions beyond 2017, the DREIR leaves the reader with the false impression that US emissions are in decline (4.7-4), when the opposite is true for 2018 and 2019. THE DREIR briefly discusses state and Santee emissions without establishing relevance to their significant environmental impacts.
O7-94	Section 4.7-2 Regulatory Setting fails to disclose Executive Order B-55-18 and the reasons for it. Nor does the DREIR discuss the importance of meeting the directive or how the project impairs the directive. At 4.7-11 the DREIR claims falsely without evidence that the Sustainable Santee Plan "interim and longer-term goals would put the City on a path toward the state's long-term goal to achieve net carbon neutrality statewide by 2045." In fact, a new sprawl project on Fanita Ranch that is not carbon negative would significantly impact and potentially preclude the state's potential to reach carbon neutrality by 2045 by continuing to produce cumulatively significant emissions.
O7-95	Section 4.7-12 states the GHG threshold of significance utilized is 3.80 MT of GHG emissions per service population (MT/SP) by year 2030 and 3.18 MT/SP by 2035 based upon page 23 of the Sustainable Santee Plan (SSP). Eventually Table 4.7-4 concludes the "Per Capita GHG Threshold for New Development" = 1.77 MTCO <sub>2</sub> e/SP. When or where has a future speculative per capita threshold been used as a CEQA compliant significance threshold? It is not credible to assert that these numbers are consistent with state goals when the DREIR has not even acknowledged EO B-55-18, nor the ramifications of failure to meet it's goal of carbon neutrality as soon as possible, no later than 2045, with negative emissions thereafter.  The City is using hocus-pocus math in a vacuum that fails to consider the reality of accelerating climate breakdown as the reason for EO B-55-18. Unsubstantiated "Don't worry - be happy" conclusions are not compliant with CEQA.
O7-96	A sprawl development on Fanita Ranch would adversely convert lands that remove GHGs from the atmosphere and sequesters GHGs in soils, root structures and canopies into a significant source of GHG emissions.
O7-97	The project will utilize natural gas at 6 community fire pits, which emits GHG emissions in production, transport and consumption. (Table 4.7-6 PDF-AQ/GHG1) These gas fire pits and the associated impacts are avoidable.
O7-98	4.7-20 The land use plan with a school would generate "243,266 daily VMT; without a school 249,124 daily VMT or "annually VMT of 84,413,302 and 86,446,028 for the preferred land use plan with school and land use plan without school, respectively."
O7-99	The project would generate a total service population of 8,424 or 8,345 without a school.  <b>RV/Boat Storage at solar site</b>  What is the capacity of the Recreational Vehicle / Boat storage facility proposed at the terminus of Carlton Hills Boulevard? Solar above/adjacent to a new city park that keeps vegetation over the geologically unstable/soils/slopes might be a compatible use. A vehicle storage yard is not because it

**O7-93:** The comment claims that the EIR does not provide current information related to GHG emissions and climate change. The EIR relied on the fifth assessment of global warming potential (GWP) published in 2013, because that assessment is consistent with the emissions analysis used in the Sustainable Santee Plan and is the same GWP used in the latest California Emission Estimator Model (CalEEMod) provided by the California Air Resources Board (CARB) in 2017. Thus the EIR's analysis provides a consistent comparison of GWP and no further response is required.

**O7-94:** The comment criticizes Section 4.7.2, Regulatory Setting, in the EIR for not having a discussion of Executive Order B-55-18, which provides a non-legislative statewide goal of achieving net carbon neutrality by 2045. Please refer to comment 05-38, which discusses this order in the context of the GHG analysis.

**O7-95:** This comment provides the commenter's opinion of the EIR's GHG analysis. Contrary to the statements made in the comment, the EIR adequately explains how the per capita GHG threshold was customized for purposes of this analysis to address new development projects in the City.

Moreover, as explained in Executive Order B-55-18:

*A locally-appropriate evidence-based Project-specific threshold can be developed based on local*

*emissions and local service population or per capita projections.* Some jurisdictions or regions do not have baseline inventories dating back to 1990 and, therefore, must extrapolate from more recent inventories which were monitored more accurately than in earlier years. To determine an overall GHG reduction target at the local level that would be consistent with the state's overall targets, CARB and the Association of Environmental Professionals (AEP) recommend community-wide GHG reduction goals for local climate action plans that would help the State achieve its 2030 target and therefore make substantial progress towards targets like 2045 and 2050 per the CARB Scoping Plan. As SB 32 is considered an interim target toward meeting the 2045 State goal, consistency with SB 32 would be considered contributing substantial progress toward meeting the State's long-term State targets is important as these targets have been set at levels that reduce California's fair share of emissions toward international targets that will stabilize global climate change effects and avoid the adverse environmental consequences described herein. (*Emphasis added.*)

The EIR explains in detail that satisfaction of the per capita GHG threshold, which was developed based on

the demographic and land use forecasts in the Santee General Plan, quantitatively demonstrates that the proposed project would conform to the GHG reduction targets identified in the Sustainable Santee Plan and help the City meet its GHG reduction commitments in furtherance of state and regional goals. In addition, please refer to Thematic Response – 2017 Scoping Plan.

- O7-96:** This comment states that the proposed project would adversely impact land that currently sequesters GHGs. The Greenhouse Gas Analysis (Appendix H) includes a full discussion of carbon sequestration under the title, Landscaping Sequestration and Net Gains/Losses in Carbon Emissions. As shown in Table M, Estimated Gains and Losses of Sequestered Carbon, included in Appendix H, implementation of Mitigation Measure GHG-5 would ensure that the proposed project results in a net annual reduction of 530.70 MT CO<sub>2</sub>e in GHG emissions.
- O7-97:** The comment criticizes the fact that the proposed project would include six open gas fireplaces, but fails to note that Mitigation Measure GHG-4 requires that the proposed project include all electric homes, thereby prohibiting gas fireplaces in any of the residential units. The six allowed fireplaces, which are limited to the community areas of the villages by PDF-AQ/GHG-1, were included in the proposed project's pre-mitigation GHG emissions analysis. As explained thoroughly in the EIR, the recommended mitigation measures would

ensure that the proposed project reduces all GHG emissions to below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR.

**O7-98:** The comment restates portions of the EIR's GHG analysis. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O7-99:** This comment provides the commenter's opinion of recreational vehicle use. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR.

In response to the balance of the comment, the number of vehicles or capacity of the Recreational Vehicle/Boat storage facility would be determined through the City's site plan review process. The Special Use area is 31.9 acres of which 20.8 acres could potentially be used for RV parking/boat storage. Potential GHG emissions associated with the operation of the proposed project, including the Special Use area, have been addressed in the EIR. As shown therein, the recommended mitigation measures would ensure the proposed project reduces all GHG emissions below a level of significance as required by CEQA.



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O7-99 cont.	induces the production, ownership and use of these high GHG emitters. Santee's street ordinance and the limited capacity of storage at Santee Lakes serves as incentive not to buy the vehicles. These recreational vehicles require GHGs to produce and are the largest emitting consumer vehicles. The storage facility has unnecessary significant GHG impacts. The storage proposal should be eliminated to reduce the significant GHG impacts of the project.
O7-100	For the solar facility to remain, sufficient fire hydrants should be installed to protect the arrays from fires under moderate weather conditions. Who will be responsible for replacing the facility if lost by a firestorm under severe weather conditions? Will there be battery storage and what are the impacts if it burns?  Has the applicant considered that an interpretive center/library within a small city park would be a less damaging alternative for the site? The Interpretive Center at Mission Trails Regional Park serves as an example and would not exclude solar energy production.
	<b>4.7-24 Mitigation Measures</b>
O7-101	GHG-1 How does the projected 12 MW of solar production compare as a percentage to the total energy demand projected for the project?
O7-102	GHG-3 How much water will be captured on site and used to offset demand and how?
O7-103	GHG-4 All-electric homes are important if all electric demand will be produced on the project site. Will all electric demand be met with solar power produced on site?  Will there be residential energy storage? If so, will it be located inside or outside of the structure? If not, what will be the requirements for addition of battery energy storage by residents?
O7-104	GHG-5 How many of the 26,705 trees will be long-lived fire resistant species (Coast Live Oaks) and native species that recover from the roots after wildfire?
O7-105	GHG-6 Please specify what type of electrical vehicles will be "provided" to residents with the purchase on a LDR unit. Why only 100 and what is the anticipated GHG offset for those 100 vehicles? Are the vehicles Tesla or similar capability, or golf carts?  Who would own and maintain the vehicles? Where would they be stored? Would they be available to the public or only to private residents that own them?
O7-106	Greater explanation for the numbers and underlying assumption presented in Table 4.7-10 is needed.
	<b>4.7.5.2 Threshold consistency with Applicable Plan</b>
O7-107	Carving out a buffer to make allowance for the Fanita Ranch project within the SSP is not appropriate.  4.7-28 Again, It is not credible to assert without evidence the SSP "put the City on a path toward the state's long-term goal to achieve net carbon neutrality statewide by 2045 when the DREIR has not even acknowledged EO B-55-18, nor the ramifications of failure to meet it's goal of carbon neutrality as soon as possible, no later than 2045, with negative emissions thereafter.  In fact, a modestly implemented plan intended to facilitate development is an <u>obstacle</u> to EO B-55-18 because uses once established are extremely difficult to change.

**O7-100:** The comment asks who will be responsible for replacing solar arrays and battery storage facilities in the event of a fire and offers an alternative use for the Special Use Area. The system will ultimately maintain 4 MWh of battery storage at full buildout. The batteries act to level out the loads that the panels produce and act as storage in case the power goes out so they are not all installed on day one. They are built at the same time that the solar panels are installed. It will be the responsibility of the homeowner's association or solar facility operator to maintain and replace the solar arrays or battery, if necessary. Section 3.3.1.9 identifies the constraints and allowed uses in the Special Use Area. The Mini-Park would serve as a trail staging area and would include interpretive signage.

**O7-101:** This comment questions the proposed project's solar production. As shown in Tables P and Q in the Greenhouse Gas Analysis (Appendix H), the proposed project's energy demand is 12.147 megawatts (MW) for the preferred land use plan with school and 12.083 MW for the land use plan without school. Mitigation Measure GHG-1 requires that the proposed project "provide on-site [photovoltaic] renewable energy generation with a total design capacity of at least 12.147 megawatts (MW) for the Preferred Land Use Plan with School, or 12.083 MW for the Land Use Plan without School at full buildout." As such, the on-site

solar facilities will provide 100 percent of the proposed project's energy demand.

- O7-102:** This comment asks about the project's water capture and reuse efforts. The proposed project includes stormwater capture such that all stormwater is retained and infiltrated into the soil onsite which would reduce stormwater runoff and help irrigate onsite landscaping areas. The amount of capture and reuse has not been calculated. The reduction in GHG emissions associated with the proposed project water conservation strategies is calculated based on the commitment to reduce water use 20 percent compared to average statewide water consumption rates. Also refer to responses to comments L3-2 and L3-3 in Comment Letter L3 (Padre Dam Municipal Water District, July 13, 2020).
- O7-103:** This comment addresses the proposed project's electricity demand. Residential battery storage would not be included in the proposed project. Please refer to response to comment O7-101, which addresses the same issue raised in this comment.
- O7-104:** This comment asks how many trees will be long-lived fire resistant species, such as coast live oak, and native species, that can recover from the roots after a wildfire. Mitigation Measure GHG-5 does not specify any particular species of trees or natural vegetation as the fire-resistance of the trees does not have a bearing on the

GHG analysis. The final landscape plans, in particular for fuel modification zones and revegetation areas, would reflect the planting requirements of the FPP (2020) (Appendix P1). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- O7-105:** The comment asks for additional information about the vehicles provided pursuant to Mitigation Measure GHG-6. As indicated therein, the applicant or designee shall provide 100 electric vehicles, which can include any available electric vehicle, possibly including but not limited to those produced by Tesla, Inc. The mitigation measure would not allow for the purchase of a neighborhood electric vehicle or golf cart.
- O7-106:** The comment asks for additional information regarding Table 4.7-10. The EIR and Greenhouse Gas Analysis (Appendix H) provide a thorough and complete review of the proposed project's potential GHG impacts and demonstrate that the recommended mitigation measures would ensure that the proposed project reduces all GHG emissions to below a level of significance as required by CEQA. Therefore, this issue is adequately addressed in the EIR.
- O7-107:** This comment attacks the validity of the Sustainable Santee Plan. This portion of the comment does not raise

a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR.

Nevertheless, it is important to note that following release of the EIR, the February 7, 2020 lawsuit filed by Preserve Wild Santee, Climate Action Campaign, and the Center for Biological Diversity challenging the City's adoption of the Sustainable Santee Plan and certification of the related Environmental Impact Report (Preserve Wild Santee et al. v. City of Santee, San Diego Superior Court Case No. 37-2020-00007331-CU-TT-CTL) has been settled. The lawsuit was dismissed, with prejudice, on July 8, 2020.

This comment also alleges that the EIR's GHG analysis improperly relies on the Sustainable Santee Plan. The comment is incorrect. As explained in detail in Section 4.7.3 of the EIR, the per capita GHG threshold was customized for purposes of this analysis to address new development projects in the City.

Moreover, as further explained in Section 4.7.5.2 of the EIR, satisfaction of the per capita GHG threshold, which was developed based on the demographic and land use forecasts in the Santee General Plan, quantitatively demonstrates that the proposed project would conform to the GHG reduction targets identified in the Sustainable Santee Plan and help the City meet its GHG

reduction commitments in furtherance of state and regional goals.

Finally, CEQA requires that an EIR consider whether implementation of a proposed project would conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As part of the analysis required to respond to that question, Table 4.7-13, Sustainable Santee Plan Community GHG Reduction Strategies (After Mitigation), was included in the EIR to demonstrate that the proposed project, following implementation of the recommended mitigation measures, would be consistent with the applicable reduction strategies of the Sustainable Santee Plan.

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07-107 cont.	4.7.6.1-2 The DREIR assumes that the project “would achieve consistency with the” SSP and that that would be sufficient to mitigate cumulative impacts to an insignificant level.
07-108	Project-generated VMT would be nearly a quarter-million miles DAILY. Rather than a standard year, the applicant uses a 347-day calendar to convert to yearly VMT of 86,446,028 miles attributed to Fanita (versus ZERO today). The missing 18-days would add as much as 4,484,232 additional miles to the yearly total. Furthermore, the applicant utilizes a speculative emissions/pollution model for 2035.
07-109	The city has undermined its own climate action plan by failing to initiate the Community Choice Energy program that is the foundation of the Sustainable Santee Plan. Projections and assumptions for achieving emissions targets are no longer valid.  The city rejected invitations from two different regional start-up CCE programs, even though CCE is a foundational element necessary to meet Santee CAP targets. Comments from city council members at hearing demonstrated a hyper-partisan search for excuses used to avoid entering into a partnership with cities with Democratic governing majorities. Santee rejected a no cost invitation to the highest revenue program from the City of San Diego. Cultural differences were specifically cited and irrationally used to reject a CCE partnership with coastal cities. In these circumstances, there is little evidence that Santee will ever enter into a CCE program without a change in city council members.
07-110	<b>4.10 Land Use and Planning</b>  Table 4.10-1 “Project Consistency...” does not disclose the significant inconsistencies with the Santee General Plan that requires the applicant to seek amendments. By only discussing the points of consistency it becomes a propaganda table. The table must be modified to disclose the inconsistencies with the current plan as well.
07-111	<b>4.12 Noise</b>  The project has “Significant and unavoidable (permanent increase in traffic noise levels).” It should be denied. Intolerable noise impacts will adversely affect Santee Lakes and adjacent neighborhoods.
07-112	Princess Joann, Wood Glen Vista and El Nopal neighborhoods affected by the construction of Magnolia Avenue to Cuyamaca would be impacted by permanent unavoidable noise impacts and additional air pollution carried by the traffic.  Double-pane windows and noise walls should be provided to existing residents impacted. How many of these residents have been contacted to determine the feasibility of some mitigation?
07-113	<b>4.16 Transportation</b>  The project has significant and unavoidable impacts to intersections, street segments and highways. These impacts adversely impact feasibility of evacuating the existing wildland urban interface and new project residents, which is not disclosed. The project should be denied.
07-114	The DREIR fails to recognize Senate Bill 743 (Steinberg 2013) is mandatory as of July 1, 2020. Certainly Santee was aware of SB 743 requirements. Considering that Santee had the ability to require evaluation of Vehicle Miles Traveled (VMT) impacts prior to the July 1 deadline and being fully aware

**07-108:** The comment calls into question the conversion of daily vehicle miles traveled (VMT) to annual VMT. The EIR relies on a conversion rate that multiplies daily VMT by 347 to determine annual VMT. This conversion rate was developed by the San Diego Association of Governments (SANDAG) as part of the Regional Framework for Climate Action Planning (ReCAP) Program. ReCAP Appendix I directs the use of 347 as a multiplier in converting daily VMT to annual VMT because, as explained therein, workday VMT is higher than weekend VMT so the reduced conversion rate accounts for that fact.

The comment also alleges that the applicant utilized a speculative emissions/pollution model for 2035. The models are not speculative. The 2035 VMT calculations come from the SANDAG Series 13 regional transportation model and convert daily VMT into annual VMT using the protocols in the SANDAG ReCAP Program. The emissions calculation converting VMT into GHG emissions was calculated in CalEEMod using the California Air Resources Board (CARB) On Road Emissions Factor Model (EMFAC2017).

**07-109:** The comment questions whether the City will enter into a Community Choice Aggregation (CCA) program. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the

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- 07-114 cont. climate and transportation were issues of controversy, why hasn't Santee as lead agency also insisted upon avoidance and mitigation for VMT impacts consistent with SB 743? The project has significant VMT impacts that are not considered. Reducing unit numbers to levels consistent with the General Plan can avoid VMT and lower fire risk. Avoidance is required.
- The DREIR at 4.7.20 discloses "annually VMT of 84,413,302 and 86,446,028 for the preferred land use plan with school and land use plan without school, respectively." Yet, there is not adequate discussion about the impacts of these trips on the environment. What are the environmental impacts of project VMT?
- "CARB determined that it will not be possible to achieve the State's 2030 and post-2030 emissions goals without reducing VMT growth." [Technical Advisory on Evaluating Transportation Impacts In CEQA, p. 2]
- 07-115 **4.16.6.4 Cumulative Threshold 4: Inadequate Emergency Access**
- The DREIR conclusion the project's contribution to inadequate emergency access would not be cumulatively considerable is wrong. Facts and the record contradict the conclusion. Simply constructing roads to standard is inadequate when the two arteries must traverse flammable vegetation to connect to an existing circulation system the DREIR acknowledges will be impacted by traffic significantly and unavoidably. The DREIR has not bothered to consider how long it would take to evacuate the project and what the potential heat exposure is along the access roads. The DREIR provides no indication of how quickly or where the roads will be gridlocked and what fuel types are adjacent to them. How will Figure 3-8 Traffic Calming Plan impact the time required to evacuate the project site? Where is the evidence to support the conclusion? In the DREIR's brief summary, the evidence does not exist to support it.
- 07-116 4.18-27-28 provides little more than a map description. This description is completely inadequate when the context of how the circulation map will function in emergency scenarios is not considered. For instance, the two routes out of the project site utilize or cross Mast Boulevard. What is the capacity of Mast Boulevard segments and what are its limitations taking into consideration existing residential surroundings as well as the project site that will converge upon it?
- 07-117 **The DREIR provides a false sense of security** by referencing "an EPP, a CFPP and a Wildfire Evacuation Plan" coupled with the phrase "to ensure the community would be built to withstand significant fire, provide residents with at least two evacuation routes that lead to at least three major arteries, and offer the contingency option to emergency planners and responders of temporarily refueling persons on site if considered safer than evacuating (Appendices P1 and P2). These documents do not **ensure** anything. In fact, they contain disclaimers and "Limitations" language.
- Can the DREIR **ensure** these routes will not be gridlocked?
- Can the DREIR **ensure** emergency personnel will be available to assess the threat, identify a viable response strategy and clearly communicate that strategy to operations and the public in a timely manner?
- Can the DREIR **ensure** individuals gridlocked adjacent to SH5 and FM4 fuels will survive a burn over?

information provided in the EIR as it relates to the proposed project's consistency with the Sustainable Santee Plan.

The City remains committed to implementing the Sustainable Santee Plan, including joining a regional entity to implement a CCA program. On October 23, 2019, the City adopted Ordinance No. 569 to establish a CCA program with an anticipated launch date of January 1, 2022, and directed City staff to negotiate and present for City Council consideration the documents necessary to join a regional entity. On January 8, 2020, the City adopted the Sustainable Santee Plan, which requires City staff to present a CCA program to City Council that aims to provide 100 percent renewable energy by 2035 (Chapter 3, Measure 10.2) and assumes that the CCA program would launch by 2022. On February 26, 2020, City adopted Resolution 020-2020 amending the fiscal year 2019-20 budget, which committed \$300,000 towards initial start-up costs that may be incurred upon forming or joining a regional entity to implement a CCA program for the procurement of electric energy by the City. The anticipated launch date of the CCA may be subject to adjustment due to forces outside the City's control, including, but not limited to, the pandemic and its ripple effects or a delay at San Diego Gas & Electric.

Moreover, as part of the settlement of *Preserve Wild Santee et al. v. City of Santee* (San Diego Superior Court

Case No. 37-2020-00007331-CU-TT-CTL), the City made a commitment to consider the following criteria with regard to a future CCA: (1) prioritize the program with the highest projected excess revenue to reinvest back into the Santee community; (2) prioritize with commitment to pooling reinvestment dollars so they are equally shared among all participating cities; (3) prioritize programs that prioritize in family sustaining middle class jobs; and (4) exclude programs that include coal and nuclear generation.

**O7-110:** This comment states that Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch, does not disclose the significant inconsistencies with the Santee General Plan that requires the applicant to seek amendments and requests the table be modified to disclose the inconsistencies with the current plan. As described in Section 3.12, Discretionary Actions, the proposed project would include approval of a General Plan amendment. Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies or Regulations, analyzed the project's potential to cause a significant environmental impact due to a conflict with the land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The EIR states that the applicant proposes to amend the 16 Guiding Principles for Fanita Ranch to better adhere to the current project design. The



existing 16 Guiding Principles for Fanita Ranch (provided in Section 4.10.2.1) would be replaced by the proposed 13 Guiding Principles identified in Table 4.10-1. These amendments are required to ensure that the proposed project is in compliance with the Santee General Plan. The EIR concluded that the proposed project would be consistent with the Santee General Plan, as amended. In response to the commenter's request, it would not make sense to evaluate the project against the existing Guiding Principles that would be replaced by a General Plan amendment upon project approval. This issue is adequately addressed in the EIR.

**O7-111:** This comment states that the proposed project should be denied because Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, concludes that impacts related to permanent increase in vehicle noise would be significant and unavoidable. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts; although not to below a level of significance. The EIR complies with CEQA Guidelines Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section

15091), and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).

**O7-112:** This comment states that neighborhoods adjacent to roadways serving the proposed project would be exposed to significant and unavoidable impacts related to noise and air quality, and requests information regarding contacts with residents regarding double-pane windows and noise walls. This comment accurately states that Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, and 4.2.5.2, Threshold 2: Cumulative Increase in Criteria Pollutant Emissions, conclude that significant and unavoidable impacts would occur as a result of project operation. Section 4.12.5.1 includes an evaluation of measures that were considered but rejected for mitigation of permanent noise impacts, including noise barriers on private property. Although residents have been involved in the public comment process through CEQA, and outreach by the applicant, such agreements for installment of noise barriers or window improvements cannot be guaranteed at this time. This measure is not considered feasible mitigation in accordance with Section 15126.4(a)(2) of the CEQA Guidelines, which requires mitigation measures to be fully enforceable. Therefore, this noise impact was determined to be significant and unavoidable. However,

this does not preclude future agreements between the applicant and private residents. This issue is adequately addressed in the EIR.

**O7-113:** This comment suggests that the project's significant and unavoidable impacts to intersections, street segments, and highways would adversely impact the feasibility of evacuating the existing wildland urban interface and new project residents, which is not disclosed. A project-specific Wildland Fire Evacuation Plan (Appendix P2) was prepared that addresses project evacuation procedures. See also Thematic Response – Evacuation regarding evacuation planning and execution in Santee and San Diego County. Note that evacuation traffic conditions would be controlled by law enforcement focusing on controlling downstream intersections to move traffic from the most vulnerable areas first. This approach is well documented and has been very successful during San Diego County's large wildfire events, and has increasingly become more efficient through technological and emergency resource availability. This issue was adequately addressed in the EIR.

**O7-114:** This comment states that the Draft EIR fails to recognize that Senate Bill 743 (Steinberg 2013) is mandatory as of July 1, 2020, and that the City should be aware of Senate Bill 743 requirements. It also questions why, as the lead agency, the City, if it had the ability to require evaluation of vehicle miles traveled (VMT) impacts prior to the July

1, 2020, deadline and was aware climate and transportation were issues of controversy, has not insisted on avoidance and mitigation for VMT impacts consistent with SB 743. Finally, the comment states that the project has significant VMT impacts that are not considered, that reducing unit numbers to levels consistent with the General Plan can avoid VMT and lower fire risk, and that avoidance is required. Section 4.16, Transportation of the EIR contains both a detailed level of service (LOS) analysis (Section 4.16.5.1) and VMT analysis (Section 4.16.5.2). The EIR contains mitigation measures for both the LOS and VMT analyses. Since the EIR began public review before July 1, 2020, a VMT analysis was not technically necessary to perform. In addition, the EIR Greenhouse Gas Analysis (Appendix H) and Air Quality Technical Report (Appendix C1) considered the project VMT in their analysis. Therefore, the EIR adequately addresses VMT.

**07-115:** This comment states the EIR’s conclusion of the proposed project’s cumulative contribution to inadequate emergency access is wrong. Please refer to Thematic Response – Evacuation regarding evacuation planning and execution in Santee and San Diego County. Note that evacuation traffic conditions would be controlled by law enforcement focusing on controlling downstream intersections to move traffic from the most vulnerable areas first. This approach is well documented and has been very successful during

San Diego County's large wildfire events, and has increasingly become more efficient through technological and emergency resource availability.

**O7-116:** This comment states the description of the circulation map is inadequate. The evacuation maps provided in the Wildland Evacuation Plan (Appendix P2) provide road networks at a high level because during an evacuation, messaging will be provided that indicates which routes are recommended. In the absence of direct messaging, it is important for residents to have familiarity with the major routes out of the area, and that is what is accomplished with the provided evacuation route map. Please refer to Thematic Response – Evacuation for details on evacuation planning and execution in Santee and San Diego County.

**O7-117:** The comment poses several questions regarding the EIR's ability to ensure the absolute fire safety of all occupants at all times. The proposed project has been analyzed at a level that exceeds the basic CEQA requirements and based on provided protection features (refer to the Thematic Response – Fire Protection and Safety), the site's hazards and the overall risk (which is low considering the ignition resistance of the proposed project) concludes that there is no significant impact from wildfire. There is no CEQA requirement, nor would it be possible for any proposed project, to ensure that accidents or unanticipated events could not affect

the project at some point. CEQA requires a thorough analysis of a project's potential impacts from and to wildfire safety and whether appropriate features or mitigations can be provided to result in an acceptable level of risk. This process has been completed for the proposed project and the FPP (2020) (Appendix P1), was accepted by the Santee Fire Department, follows a thorough review by fire prevention experts, and concurs that an acceptable level of risk would be achieved.

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O7-117 cont.	<p>Can the DREIR ensure individuals will remain in their homes if they are told it is too late to evacuate?</p> <p>Can the DREIR ensure occupied homes built at the top of a fire chimney will not ignite?</p> <p>Can the DREIR ensure a single ignited home will not ignite the tightly spaced adjacent homes and initiate a chain of cluster burned occupied structures?</p> <p>Can the DREIR ensure individual homes and adjacent FMZs will be properly maintained over time and that they will never be subjected to severe convective fire behavior?</p> <p>Can the DREIR ensure a Temporary Refuge Area will function adequately to protect individuals and firefighters from radiant heat or direct flame impingement?</p> <p>The DREIR is fatally flawed without considering these issues.</p>
O7-118	<p><b>4.17 Utilities and Service Systems</b></p> <p>The project has significant unavoidable impacts and should be denied.</p> <p>Reference our prior comments on water supply.</p>
O7-119	<p><b>Chapter 5 Other CEQA Considerations</b></p> <p>[5.4] Where is the evidence to support the contention that the project site was considered for "14,000" units. Repetition does not make a fact. The direct evidence should be provided or the language stricken.</p>
O7-120	<p><b>Chapter 6 Alternatives</b></p> <p>The project should be denied because it has significant unavoidable impacts.</p>
O7-121	<p>The courts have directed the applicants to "take all relevant actions necessary to comply with CEQA" yet an Alternative has not been presented that would adequately address fire safety or biological issues that were primary in prior litigation.</p>
O7-122	<p>A Conservation Alternative that was part of the 1998 EIR and discussed current funding sources was not updated. Please do so as a modification of the "No Project/No Build Alternative.</p> <p>This discussion should acknowledge that the city blocked the 50% of funds available through the REPI buffer program when there was a willing seller prior to the current applicant gaining control of the land. [City of Santee, Kush to MCAS Miramar, Thornton, May 14, 2010] That program should still be available to prevent encroachment of MCAS-Miramar by the project.</p>
O7-123	<p>The project has significant impacts upon operations by likely increasing the number of trespassing events that interrupt training activities. The base has also experienced illegal trail building. The DREIR does not disclose the significant encroachment impact issues.</p>
O7-124	<p>Military flights occasionally crash. A jet crashed on Fanita in the 1980s. Another flight crashed more recently into homes in San Diego. The northern portion of the project is directly under the fixed-wing</p>

**O7-118:** This comment states that the proposed project has significant and unavoidable impacts to utilities and service systems and should be denied. Further, the comment refers the reader to prior comments on water supply. Section 4.17, Utilities and Service Systems, in the EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts; although not to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093). Further, there are no additional comments on water supply in this comment letter.

**O7-119:** The comment appears to refer to Section 5.2.1 of the EIR, which explains that in 1980 the project site was designated in the County of San Diego General Plan for development of approximately 14,000 residential units (prior to the incorporation of the City). Please refer to

response to comment O7-85, which addresses the same issue raised in this comment.

- O7-120:** This comment states that the proposed project should be denied because it has significant and unavoidable impacts. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts, although not to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approve Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).
- O7-121:** This comment states that an alternative has not been presented that would adequately address the fire safety and biological issues that were primary concerns in prior litigation. The City disagrees with this comment. The EIR analyzed five alternatives selected for evaluation to represent a reasonable range of potentially feasible alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the proposed



project in accordance with CEQA Guidelines, Section 15126.6. Of the alternatives evaluated, four alternatives were concluded to lessen the potentially significant impacts to biological resources and three alternatives were concluded to lessen the potentially significant impacts to wildfire. Therefore, this issue is adequately addressed in the EIR.

- O7-122:** This comment states that the Conservation Alternative that was a part of the 1998 EIR discussed current funding sources that should be added to the No Project/No Build Alternative. The 1998 EIR and Conservation Alternative analyzed a different project and development footprint from the proposed project. The EIR analyzed five alternatives selected for evaluation to represent a reasonable range of potentially feasible alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the proposed project in accordance with CEQA Guidelines, Section 15126.6. No changes have been made to the EIR in response to this comment.
- O7-123:** This comment states that the proposed project has significant impacts upon operation by likely increasing the number of trespassing events on MCAS Miramar and that these encroachment impacts should be disclosed in the EIR. Encroachment is not an environmental issue in accordance with the CEQA Guidelines. This comment does not raise a significant environmental issue regarding

the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**O7-124:** This comment states military flights occasionally crash and states an instance where a jet crashed on the project site in 1980 and in homes in San Diego. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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- 07-125 | landing path. The DREIR does not consider or disclose the significant safety impacts of locating development there. Rotary aircraft fly over the southern portion of the site. The site is subject to extremely high noise levels when either of these flight paths are in use. Significant noise impacts upon future residents are not disclosed.
- 07-126 | What are the noise levels at "Orchard Village" and the "Vineyard Village" during flight operations? Residents of "Vineyard Village" will experience the worst noise levels due to the higher elevation. Jets scream over this Fanita mountain location.
- 6.2.1.1 Impact Analysis
- 07-127 | The DREIR failed to consider the alternatives suggested in our prior comments.
- 07-128 | Concluding that the No Project/No Build Alternative would have potentially significant indirect species impacts compared to the project is false and not supported by substantial evidence. The statement should be stricken. It ignores the potential for conservation and managed open space as directly evidenced by adjacent open space parks/preserves. [6-5]
- 07-129 | The conclusion that the No Project/No Build Alternative would have "potentially greater impacts on emergency access than the proposed project" is false and not supported by substantial evidence. [6-6] The statement should be stricken. The DREIR hasn't adequately performed basic analysis required to make these determinations – such as study the capacity of Mast Boulevard during various evacuation scenarios. The No Project/No build Alternative avoids the potential evacuation of over 8,000 new residents conflicting with evacuations of existing residents.
- 07-130 | The conclusion that the No Project/No Build Alternative would "expose existing residences to wildfires would be potentially greater under this alternative than the proposed project" is false and not supported by substantial evidence. The statement should be stricken. [6-6] [6-7]
- 07-131 | The conclusion that the No Project/No Build Alternative "would not benefit from large blocks of open space actively managed as Habitat Preserve because the site would remain unmanaged and continue to be susceptible to degradation over time" ignores the potential for the site to connect as a managed extension of Sycamore Canyon and Mission Trails regional parks. It is false and not supported by substantial evidence. The statement should be stricken. [6-7]
- 6.2.2 No Project/General Plan Consistency Alternative
- 07-132 | "The Santee General Plan currently allows up to 1,395 residential units on the project site and identifies 16 Guiding Principles for its development." [Fanita Ranch DREIR p. 6-5] The project is not consistent with the number of units allowed by the Santee General Plan and should be denied due to the significant unavoidable impacts caused by added population density.
- 07-133 | All statement suggesting the project or a project alternative lacks conflict with the MSCP Subarea Plan should be stricken. The City has failed to process a final MSCP Subarea Plan consistent with law since completion was promised in 1994. [AR I:193:019286] [6-11] Comparisons to evolving drafts peddle false conservation narratives.

**07-125:** The comment states that the northern portion of the project site is directly under the fixed-wing landing path and the EIR does not consider or disclose the safety impacts of locating development here. Section 4.8.5.5 Hazards and Hazardous Materials, Threshold 5, Airport Safety Hazards, analyzed the potential safety hazards for people residing or working in the project site near an airport. The EIR discloses that the project site is located within the vicinity of two airports, MCAS Miramar and Gillespie Field. The EIR concluded that implementation for the proposed project would not result in a significant impact regarding airspace safety hazards or conflicts with the land use plans for either airport because the developed portions of the site would not fall under either airport's restrictions besides the Special Use Area, which would not conflict with these plans. This issue is adequately addressed in the EIR.

**07-126:** This comment states that future noise impacts to the site as result of overflight from Marine Corps Air Station Miramar (MCAS) are not disclosed. Noise exposure from MCAS Miramar is addressed in Section 4.12.5.3, Threshold 3: Aircraft Noise. The project site would continue to be subject to audible overflights from MCAS Miramar; however, the proposed project site, including Orchard Village and Vineyard Village, is not located within the air station's 60 dBA CNEL noise contour. Therefore, a significant CEQA impact would not occur and no mitigation is required. This

issue is adequately addressed in the EIR. Future real estate and tenant agreements would be subject to all applicable disclosure requirements.

**O7-127:** This comment states the EIR fails to consider the alternatives suggested in the commenter's prior comments. Please refer to response to comments O7-121 and O7-122, which addresses the same issue raised in this comment.

**O7-128:** This comment states concluding that the No Project/No Build Alternative would have potentially significant indirect species impacts compared to the proposed project is false and not supported by substantial evidence. The comment requests the statement be stricken from the EIR. Chapter 6, Alternatives, evaluates the No Project/No Build Alternative in which the site would remain in its existing condition and no management of the site would occur. Because this alternative would not benefit from active habitat management, as would be under the proposed project, indirect impacts to biological resources could occur because unauthorized motorized and non-motorized vehicles would continue to use the site, causing degradation of the natural habitat and sensitive species. Therefore, potentially greater indirect impacts to biological resources could occur.

**O7-129:** This comment states that the conclusion that the No Project/No Build Alternative would have “potentially greater impacts on emergency access than the proposed project” is false and not supported by substantial evidence. The comment further states the EIR hasn’t adequately performed basic analysis required to make these determinations. Section 6.0, Alternatives, discusses the No Project/No Build Alternative and specifically Section 6.2.1.1 discusses the wildfire and evacuation impacts of this alternative compared to the proposed project. Under the No Project/No Build Alternative, it is unlikely that Santee Fire Department would commit resources into the site to fight a vegetation fire burning under anything but very mild conditions. Access is limited currently to dirt roads with no safety zones or temporary refuge areas. With the proposed project, road improvements, including providing multiple new lanes, and designated inbound fire access would be included along Fanita Parkway, Cuyamaca Street, and Magnolia Avenue, as well as throughout the project site. The access roads would be provided “hardening” via fuel modification on either side and the proposed project site would provide large areas of ignition and ember resistant landscapes and structures, resulting in a defensible community that also provides protection and safety zones for fire fighters. The proposed project represents a large fuel break, resulting in less wildland vegetation fuels to

carry wildfire than if the project site was left in its undeveloped state. It also provides staging areas throughout the community and could be part of strategic and tactical firefighting operations. In addition, please refer to Thematic Response – Evacuation for additional detail regarding evacuation scenarios and further analysis.

**07-130:** This comment states that the No Project/No Build Alternative would “expose existing residences to wildfires would be potentially greater under this alternative than the proposed project” is false and not supported by substantial evidence. This comment further states that the statement should be stricken. Section, 4.18, Wildfire, analyzed the impacts of bringing the proposed project into the development and fire risks associated with it. The proposed project would convert nearly 988 acres of ignitable fuels to lower flammability landscape and hardscape, include better access throughout the site, provide managed and maintained landscapes, and place more fire aware individuals on the ground that would reduce the likelihood of arson, off-road vehicles, shooting, or other non-authorized recreational-based activities that cause fires, some of which is currently occurring on the undeveloped project site. In addition, the proposed project would act as a buffer between the undeveloped land to the west and north and existing City residences to the south.

- O7-131:** This comment states the conclusion that No Project/No Build Alternative “would not benefit from large blocks of open space actively managed as Habitat Preserve because the site would remain unmanaged and continue to be susceptible to degradation over time” ignores the potential for the site to connect as a managed extension of Sycamore Canyon and Mission Trails regional parks and that the statement is false and not supported by substantial evidence. Please refer to response to comment O7-128 which addresses the same issue raised in this comment.
- O7-132:** This comment states the proposed project is not consistent with the number of units allowed by the Santee General Plan and should be denied due to the significant and unavoidable impacts caused by population density. Please refer to response to comment O7-110, which addresses the same issue raised in this comment.
- O7-133:** This comment states that the statement suggesting the project or a project alternative lacks conflict with the MSCP Subarea Plan should be stricken and states the City has failed to process a final MSCP Subarea Plan consistent with law. As stated in Section 4.3.2, Biological Resources, Regulatory Framework, although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it is used by the City as the guidance document for projects occurring in the City. If

the Draft Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through FESA Section 7 or an individual Section 10 permit. See also Thematic Response – Santee MSCP Subarea Plan.



*Preserve Wild Santee*

O7-134

**Conclusion**

The comments from our prior letters remain relevant. Those points are carried forward.

Sincerely,



Van K. Collinsworth  
Geographer/Fire Expert/Director

Prior Professional Fire Experience:  
United States Forest Service Wildland Firefighter (Engine and Line Crews 1980-1993)  
Cal Fire Defensible Space Inspector (2016-2019)

Exhibit References (filed separately):

- 1: 100 Feet of Defensible Space DSI Checklist
- 2: Temporary Refuge Area Considerations
- 3: Cedar Fire Faces
- 4: FPPC Summary of Enforcement Decisions
- 5: City of Santee to MCAS Miramar, May 14, 2010
- 6: Wildlife Agency / City of Santee Email
- 7: Factors related to building loss due to wildfires in the conterminous United States
- 8: News 21 State of Emergency
- 9: RE: Response to Comments/Fanita REIR, Public Safety – Wildland Fire, Agenda Item 2A
10. Lessons Learned from Waldo Canyon
11. SB-474 Very high fire hazard severity zone: state responsibility area: development prohibition (2019-2020)
12. Wine Country requests hundreds of engines in firestorm's first hours. Less than half came.
13. Federal Register, Fish and Wildlife Service NOI, Santee MSCP 2006
14. Santa Rosa comes to terms with the scale of devastation
15. Mega Fires: The Case for Mitigation
16. High Density Development Damage Comparisons

**O7-134:** This is a closing comment referring to comments from prior letters submitted by the commenter, although it doesn't provide dates or topics of the letters. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter O8: Preserve Wild Santee, July 13, 2020



*Preserve Wild Santee*

July 13, 2020

Chris Jacobs, Principal Planner  
 Department of Development Services  
 Santee City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071  
 Email: cjacobs@cityofsanteeca.gov

**Fanita Draft Revised Environmental Impact Report – Supplemental Comments**

Mr. Jacobs,

- O8-1 | Each of the Alternatives should have a detailed discussion of estimated fatality rates in the event of a reasonable number of failed evacuation scenarios, where residents are simply notified too late to leave their homes, or they are stuck in gridlock, as in, for example, the Camp Fire in Paradise, California.
  - O8-2 | Please confirm that most wildfire fatalities in the State and elsewhere are a result of people being unable to evacuate in a timely manner.
  - O8-3 | Please model a number of scenarios for each alternative design and predict the superior life saving density and lay out for the project. Please include in the modeling the optimum time evacuation orders will need to be issued and by whom, in order to successfully evacuate all residents. Again for each project design alternative
  - O8-4 | Please also have both the police and fire departments certify that they will have personnel available, even in the case of a multi-fire event in San Diego County and/or to run timely evacuations, specifically referencing the various model scenarios.
  - O8-5 | Please state what is, to the City, as the lead agency, an acceptable fatality rate and be sure to put it in the eventual Statement of Overriding Considerations. In other words, in return for tax revenue and other economic benefits, how many lives are you willing to lose because the massive project, as proposed, cannot be evacuated in a reliable timely manner?
  - O8-6 | I am also enclosing four very well thought out letters/exhibits from fire experts who analyzed the DEIR on the pending Otay Projects. The projects are proposed for similar settings and the expert opinions are based upon science and conclusions consistent with expert letters recently submitted regarding the Fanita project.
- The premises, science and conclusions contained are consistent with what our experts have to say.

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 PreserveWildSantee.org

**O8**

**O8-1:** The comment states that each of the alternatives should have a detailed discussion of fatality rates in the event of a failed evacuation. Chapter 6, Alternatives, cites Section 15126.6 of the CEQA Guidelines, which explains the purpose of the analysis of alternatives. Specifically, the analysis of alternatives should be limited to alternatives that “would avoid or substantially lessen any of the significant effects of the project.” Section 4.8.5.6, Threshold 6: Emergency Response and Evacuation Plans, in Section 4.8, Hazards and Hazardous Materials, and Section 4.18.5.1, Threshold 1: Emergency Response Plan or Evacuation Plan, in Section 4.18, Wildfire, in the EIR address emergency evacuation. Both sections conclude that the proposed project, which includes a Fire Protection Plan (Appendix P1) and Wildland Fire Evacuation Plan (Appendix P2), would not significantly impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. Therefore, an analysis of fatality rates for each alternative is not required based on the stated purpose of the analysis of alternatives.

**O8-2:** The comment requests confirmation that most wildfire fatalities in the state and elsewhere are a result of people being unable to evacuate in a timely manner. Sections 4.8.5.6 and 4.18.5.1 in the EIR address emergency evacuation. Both sections conclude that the proposed

*Preserve Wild Santee*

Sincerely,



Van K. Collinsworth, M.A.  
Geographer/Fire Expert/Director

Attachments

project, which includes a Fire Protection Plan (Appendix P1) and Wildland Fire Evacuation Plan (Appendix P2), would not significantly impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. To provide conclusions regarding evacuations “in the State and elsewhere” is beyond the purpose of the EIR for the proposed project, which is to “identify the potentially significant effects of the proposed project on the environment and to indicate the manner in which those significant effects can be avoided or reduced to less than significant, to identify any significant and unavoidable adverse impact that cannot be mitigated to below a level of significance, and to identify reasonable and potentially feasible alternatives to the proposed project that would avoid or substantially lessen any significant adverse environmental effects associated with the proposed project” (see Section 2.3, Purpose and Use of the Environmental Impact Report, in Chapter 2, Introduction).

**O8-3:** The comment requests a number of model scenarios and a prediction of the superior life-saving density and layout for each alternative. Please refer to response to comment O8-1, which addresses the purpose of the alternatives analysis.

**O8-4:** This comment requests that both the police and fire departments certify that they would have personnel available in the case of a multi-fire event in the County

of San Diego and/or to run timely evacuations. As stated in Section 4.14, Public Services, will-serve letters were provided from both the San Diego County Sheriff's Department and Santee Fire Department (Appendix M) stating that they would serve the proposed project.

- O8-5:** The comment asks for an acceptable fatality rate if the proposed project cannot be evacuated in a timely manner. Sections 4.8.5.6 and 4.18.5.1 address emergency evacuation. Both sections conclude that the proposed project, which includes a Fire Protection Plan (Appendix P1) and Wildland Fire Evacuation Plan (Appendix P2), would not significantly impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. Therefore, this question is not relevant in light of the EIR conclusions.
- O8-6:** This is a closing comment and does not raise a significant environmental issue regarding the accuracy or adequacy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter O9: San Diego Audubon Society, July 13, 2020



Fostering the protection and appreciation of birds, other wildlife and their habitats...

July 13, 2020

Chris Jacobs, Principal Planner  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071  
 Email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

Subject: SDAS comments on Fanita Revised Draft EIR related to wildlife corridors and regional planning

Dear Mr. Jacobs:

The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. This letter is in regards to Section 4.3, Biological Resources and Appendix D, Biological Resources Technical Report. SDAS has also signed on to and supports the comment letter from the WHCC, and has submitted a separate letter regarding impacts to several specific species. Questions that need to be answered in the review process have been printed in **bold text** for easier location.

The main point of this letter is the vital importance of wildlife corridors and how this DEIR fails to take a regional approach to wildlife and wildlife movement. Wildlife corridors are analyzed in Section 4.3.1.5, but the analyses is self-contradictory. There appear to be direct impacts to habitat linkages and wildlife corridors as a result of the proposed project development. While page 4.3-12 states that the project site has no distinct wildlife corridors, the conclusion in this section states, "The entire project site currently functions as a habitat block with no distinct wildlife corridors or linkages." On page 4.3-115, "Two locations pass through the western portion of the project site to MCAS Miramar, one connects the northeastern portion of the project site to lands within the County, and another crosses to the north to lands within the County. As a result, there **would be direct impacts to habitat linkages and wildlife corridors as a result of proposed project development.**" Threshold 4: Native Resident or Migratory Fish or Wildlife Species is listed as "Potentially Significant." **How can it only be Potentially Significant?** The underlined above states otherwise. **Will this Impact be updated to Significant in view of this information?**

In Appendix D, the Fanita Ranch wildlife corridors are analyzed and its intersection with regional wildlife corridors, but does not properly address the impacts of the proposed project. It is addressed here, "...the purpose of the wildlife movement study was to assess the degree to which the project site functions as a regional wildlife movement corridor and to evaluate wildlife movement on the project site and off-site lands adjacent to the proposed project." The proposed project design provides for a primary wildlife corridor through the proposed project, with a minimum width of 1,150 feet. It also

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**O9**

**O9-1:** This comment provides an introduction to this comment letter and also refers to Comment Letter O-12 (Wildlife and Habitat Conservation Coalition, July 13, 2020). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Refer to Comment Letter O-12, which address the comments provided in that letter. No further response is required.

**O9-2:** This comment states that the EIR fails to take a regional approach to wildlife and wildlife movement. This comment states that EIR analysis is self-contradictory, noting that while the EIR states that the project site has no distinct wildlife corridors, it also states that "two locations pass through the western portion of the project site to MCAS Miramar . . .", citing EIR page 4.3-115 (in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife Species, in Section 4.3, Biological Resources). This comment concludes that the proposed project would have direct impacts to habitat linkages and wildlife corridors. In addition, this comment asks how the impact to Threshold 4 can be called "potentially significant" if the EIR concludes that an impact will occur and whether the impact will be updated to significant.

O9-1  
 O9-2  
 O9-3

The EIR does provide a regional analysis of potential impacts to wildlife corridors and habitat connectivity. Per applicable criteria in Appendix G of the CEQA Guidelines, the proposed project was evaluated in Section 4.3.5.4 under Threshold 4 (interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites). Figure 4.3-10, Regional Wildlife Corridors, in the EIR shows regional wildlife corridors within 5 miles of the project site. The EIR also states that the project site contributes to regional wildlife movement between County of San Diego open space, MCAS Miramar, and Santee Lakes Recreation Preserve as shown on the Draft Santee MSCP Subarea Plan Preserve System Map (see Figure 4.3-3, Regional Planning Context – Draft Santee MSCP Subarea Plan).

The EIR is not contradictory in its treatment of wildlife corridors. The statement “two locations pass through the western portion of the project to MCAS Miramar . . .” cited in the comment refers to regional wildlife corridors. The EIR statement that the project site has no distinct wildlife corridors refers to an absence of distinct local wildlife corridors and habitat linkages on the project site itself under existing conditions (i.e., wildlife are able to freely move throughout the entire project site). Therefore, the project site



currently enables wildlife movement, and development of the project site would result in direct impacts. These impacts are considered potentially significant absent mitigation. However, as described in Section 4.3.5.4, mitigation is recommended. Specifically, Mitigation Measures BIO-1, BIO-6, BIO-9, BIO-10, and BIO-20 preserve on-site habitat areas designed as wildlife movement corridors and provide links to off-site habitat areas. Further, Mitigation Measures BIO-22 and BIO-23 would design and implement a wildlife corridor and crossings for wildlife movement. Based on the opinion of the biological experts who prepared the impact analysis and the recommended mitigation, implementation of these mitigation measures would reduce impacts to wildlife corridors and habitat linkages to below a level of significance.

- O9-3:** This comment states that impacts to the project site wildlife corridors and the site's intersection with regional wildlife corridors are analyzed in Appendix D (Biological Technical Report) but that Appendix D does not properly assess the proposed project's impacts. With respect to the width of the primary wildlife corridor, this comment refers to the statement in Appendix D that "this criterion meets generally accepted wildlife principles and Draft Santee MSCP Subarea Plan Guidelines" and questions where these principles come from, such as peer-reviewed literature.

Appendix D addresses the proposed project's impacts to regional wildlife corridors in Section 5.1.6, Wildlife Movement, for direct impacts and Section 5.2.5, Wildlife Movement, for indirect impacts. Village development would directly impact the northern portion of the project site that currently contributes to regional wildlife corridors and habitat connectivity west, north, and east of the project site. The impact analysis and mitigation strategy are based on this direct impact occurring. Through implementation of Mitigation Measure BIO-22 (Wildlife Corridors), and as shown on Figure 4.3-9, Local Wildlife Corridors, wildlife movement and habitat connectivity would be preserved along the northwestern and northern boundaries of the project site, with Habitat Preserve widths between permanent development and the project site boundary ranging from 619 feet to more than 1,400 feet, providing a buffer between development and off-site open space north of the project site protected and managed as part of County of San Diego Park Preserve lands. Likewise, along the western boundary, the Habitat Preserve would be 400 to 1,000 feet wide, where it connects to preserved MCAS Miramar open space west of the project site. Because the Habitat Preserve abuts extensive preserved open space to the north and west, the regional wildlife corridors are functionally much broader than just the widths of Habitat Preserve on the project site, as illustrated on Figure 4.3-10, Regional Wildlife Corridors. The Habitat Preserve along

the western and northern boundary therefore contributes to the regional wildlife movement and habitat connectivity within approximately 5 miles of the project site, including Goodan Ranch/Sycamore Canyon County Preserve to the north, San Diego County open space to the east, and MCAS Miramar open space to west. Based on the opinion of the biological experts who prepared the impact analysis, from a regional perspective, the proposed project would not substantially constrain wildlife movement and habitat connectivity. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

The evaluation that the minimum 1,150 feet wide north-south primary corridor (Primary 2 on Figure 4.3-9, Local Wildlife Corridors) is consistent with the connectivity concepts contained in the Draft Santee MSCP Subarea Plan Guidelines. Although the Draft Santee MSCP Subarea Plan has not been approved, the connectivity concepts in the plan draw from the broader, coordinated, science-based San Diego Monitoring and Management Program established by SANDAG for providing regional consistency and management and monitoring in the San Diego MSCP and MHCP, as well as empirical data on corridor use contained in wildlife corridor studies in the San Diego region conducted by Ogden (1992). The Draft Santee MSCP Subarea Plan defines corridors, such as Primary 2, as “a connection that allows for native species movement, dispersal and migration of

wildlife species, and is generally narrower in width than a linkage.” Specific criteria for a corridor related to minimum widths contained in the Draft Subarea Plan include the following:

- Promote wildlife corridor(s) with a minimum width of 1,000 feet along the entire corridor length, excluding vegetation fire management zones, accessory uses, limited building zones, and other uses not compatible with long-term biological preservation of the conserved lands to provide for the movement of larger wildlife species, including some edge buffering.
- Allow for corridor pinch points less than 1,000 feet for relatively short distances, where it is not feasible to provide a width of 1,000 feet along entire length of corridor. Ensure corridor has a minimum width of 400 feet for no more than 500 feet of linear distance.
- Wildlife corridor design shall plan for those wildlife species with the largest corridor width requirements.

Even without the Draft Santee MSCP Subarea Plan, corridor concepts and criteria would have been similar to those cited above. For example, the local species likely with the largest corridor width requirements is mountain lion, which is known to move through corridors more narrow than 1,000 feet in the San Diego region, including through a 300-foot-wide section for 500 feet of the Carmel Mountain to Peñasquitos Lagoon corridor (Ogden 1992).



Fostering the protection and appreciation of birds, other wildlife and their habitats...

O9-3 cont. states, "This criterion meets generally accepted wildlife movement principles and Draft Santee MSCP Subarea Plan Guidelines." **Where does generally accepted wildlife movement principles come from? Is there peer approved literature to support this claim?** The Draft Santee MSCP Subarea Plan has not been approved and guidelines could change. Alignment with the Draft plan can not be used as evidence of appropriate mitigation since it has not been approved, so this EIR must be look at all the direct, indirect, and cumulative impacts to the species in the MSCP independent of that Draft plan. **Will this reference be changed to reflect this?** In Section 4.5.4, "Habitat linkages may serve both as habitat and as avenues of gene flow for small animals, such as reptiles and amphibians." **Will this be updated to include mammals?**

O9-4

O9-5

O9-6 To connect the two villages of the project, there will be two roads constructed as described on page 4.3-116, however it is stated that at interior streets "V" and "W" it will hinder wildlife movement. Also the farm's location narrows the manufactured corridor up to 30%. **Will there be a plan to protect wildlife from this attractive and dangerous situation a farm could entail? Would it provide safety for residents and wildlife to locate this farm to a more sensible location?** Wildlife would have to cross streets "V" and "W" to get to the undercrossing along Cuyamaca Street. **How will this transition from wildlife corridor to street to corridor again be constructed? What prevents wildlife from entering the residential community? How is the developer planning for safe crossing of wildlife over and under these streets, for the safety of drivers and the wildlife?** When describing the dimensions of the proposed crossing there is this description, "...would meet the suggested 0.6 openness ratio suggested for mule deer and other large mammals in Southern California." **Is there a cited reference for this suggested openness ratio?** There is no data provided these measurements would be effective. **Has any qualified wildlife biologist been consulted in regards to this design? Why not refer to the list of mammals listed in Table 4.8 in this section instead of using the term "other large mammals in Southern California?"**

O9-7

O9-8

O9-9 Mitigation Measures BIO-22 and BIO-23 are cited for Threshold 4: Native Resident or Migratory Fish or Wildlife Species, but edge effects and wildlife corridors are unavoidable significant impacts.

O9-10 Mitigation measure BIO-22 describes dimensions of the wildlife corridors, but provides no evidence they will bring the impacts to Less than Significant. **Have these plans been studied by a qualified wildlife biologist that the spaces are of sufficient dimensions that wildlife will find safe and adequate to navigate? Is there a study or peer reviewed literature that supports these mitigation measures will be effective?** There is no analyses for noise or exposure to urban pollutants or other human related activities will cause edge effects as discussed on page 4.3-40. **Will there be mitigation for edge effects to biological resources and the manufactured interior wildlife corridor's proximity to the residential communities?**

O9-11

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**O9-4:** With respect to wildlife corridors discussed in response to comment O9-3, this comment states that the Draft Santee MSCP Subarea Plan has not been approved, and guidelines could change. Therefore, the Draft Santee MSCP Subarea Plan cannot be used as evidence of appropriate mitigation, and all impacts would be analyzed independent of the plan. This comment asks whether the EIR will be revised to reflect this. Please refer to response to comment O9-3, which raises the same issue raised in this comment with regard to the Draft Santee MSCP Subarea Plan. Please also refer to Thematic Response – Santee MSCP Subarea Plan.

**O9-5:** This comment refers to a statement in Section 4.5.4 of the Biological Resources Technical Report (Appendix D) ("habitat linkages may serve both as habitat and an avenue of gene flow for small animals, such as reptiles and amphibians") and asks whether this will be revised to include mammals.

The EIR currently states in Section 4.3.15, Wildlife Corridors and Habitat Linkages, "Habitat linkages may serve both as habitat and an avenue of gene flow for small animals, such as reptiles, amphibians, and rodents." Therefore, revising the Biological Resources Technical Report (Appendix D) is unnecessary.

**O9-6:** This comment notes that the EIR concluded that Streets "V" and "W" will hinder wildlife movement and that the

proposed Farm’s location narrows the “manufactured” corridors up to 30 percent. This comment portrays the Farm as an “attractive and dangerous situation” for wildlife and asks whether the Farm could be located to a more sensible location.

This comment does not identify how or in what way the community Farm would be “attractive and dangerous” to wildlife. As described in the Biological Resources Technical Report (Appendix D), Section 1.3.1, Fanita Ranch Components, the approximately 27-acre Farm would include a large barn providing a venue for special events and the Farm’s operations, including terraced vegetable fields, pasture lands, limited housing for employees, raised gardens, and small-scale animal husbandry. While the Farm would reduce the width of the southern portion of Primary 2 wildlife corridor, at 1,216 feet, the corridor width in this area would still exceed the 1,000 minimum width criterion discussed in response to comment O9-3.

- O9-7:** This comment asks how the transition from wildlife corridor to street to corridor will be constructed, what will prevent wildlife from entering the residential community, and what is the planning for safe crossing of the streets by wildlife and vehicles.

Wildlife entering the residential community was not identified as a risk factor or indirect impact of the proposed project, and therefore, there are no specific EIR mitigation

measures to prevent wildlife from entering the residential community. Such occurrences are typically referred to local authorities or wildlife organizations if the situation is perceived to pose a risk to wildlife or the public. In addition, Mitigation Measure BIO-20 includes measures requiring covenants, conditions, and restrictions forbidding collection of native wildlife, recommendations for keeping pets and pet food indoors and safe, and restrictions against controlling species such as coyotes, bobcats, and rattlesnakes and other native species unless there is a threat to life or property.

Wildlife crossing of Streets “V” and “W” would be at grade. Potential direct impacts to wildlife crossing the roadways would be mitigated by Mitigation Measure BIO-20 (Wildlife Protection), which incorporates features that would allow wildlife to cross the roadways more safely, including a 25 mile-per-hour speed limit, street signs, speed bumps, and other traffic-calming devices. Each of these features is included in the corridor design criteria to minimize impacts to wildlife movement in the Draft Santee MSCP Subarea Plan. BIO-22 (Wildlife Corridors) includes Measure No. 6 that states that safety lighting for Streets “V” and “W” would be button started with a timer shut-off delay so that lighting would not on at night except for emergency purposes or pedestrian safety.

- O9-8:** This comment asks whether there is a cited reference for the 0.6 openness ratio standard for the proposed wildlife crossing of the Cuyamaca Street extension, whether any

qualified wildlife biologist has been consulted in regard to the undercrossing design, and why the EIR does not refer to the list of mammals listed in Table 8 of the Biological Technical Report (Appendix D) instead of using the term “other large mammals in Southern California.”

Literature reference to openness ratios include Reed et al. (1975), Donaldson (2005), and Clevenger and Waltho (2000, 2003), among many other wildlife crossing studies. For example, Donaldson (2005) found that the length of a structure should be short enough to result in an openness factor of at least 0.25 to discourage white-tailed deer from turning around at structure crossings, so the proposed undercrossing, which has an openness factor of 0.7 (see Biological Resources Technical Report [Appendix D], Section 5.1.6, Wildlife Movement), exceeds this threshold by almost three times.

Dudek senior biologist Brock Ortega was directly involved in the undercrossing design. Mr. Ortega has more than 25 years of experience in assessing and designing corridor crossings for projects such as the proposed project and is a San Diego County-certified biologist.

The comment suggests referring to Table 4-8 in the Biological Technical Report (Appendix D) instead of “other large mammals in Southern California.” The City agrees with this request, and the text in Section 4.3.5.4, Threshold



4: Native Resident or Migratory Fish or Wildlife Species, has been revised to state the following:

The proposed crossing, which would measure 6.9 meters (22.5 feet) wide by 3.7 meters (12.0 feet) tall by 35.0 meters (115 feet) long (0.7 openness ratio), would meet the suggested 0.6 openness ratio suggested for mule deer, and other ~~large mammals in Southern California~~, mid-sized mammal species documented during camera studies listed in Biological Resources Technical Report (Appendix D), Table 4-8, including bobcat and coyote. Mountain lion would also use the undercrossing.

**09-9:** This comment states that Mitigation Measures BIO-22 and BIO-23 are cited for Threshold 4: Native Resident or Migratory Fish and or Wildlife Species, but that edge effects and wildlife corridors are unavoidable significant impacts.

It is assumed from the comment that the commenter views the project edge effects as unavoidable significant impacts that cannot be mitigated under the proposed project. It is unclear why the comment refers to wildlife corridors also as unavoidable significant impacts. In any case, the City respectfully disagrees with this conclusion. The EIR identifies potentially significant indirect impacts on wildlife movement in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife Species, including noise, vibration, lighting, increased human activity, altered fire

regimes, and increased roadkill. The EIR concluded that development of the proposed project would result in significant indirect impacts to wildlife movement corridors both on and off site. The EIR proposes several mitigation measures to reduce these potential indirect effects to less than significant. As described in detail in Section 4.3.5.4, Mitigation Measure BIO-22 (Wildlife Corridors) includes measures to direct lighting away from the Habitat Preserve and to control public and pet access to trails. Other mitigation measures that will reduce indirect impacts include Mitigation Measures BIO-1 (Preserve Management Plan), BIO-6 (Land Use Adjacency Guidelines), BIO-9 (Habitat Preserve Protection), BIO-10 (Weed Control Treatments), BIO-20 (Wildlife Protection), and BIO-21 (Fire Protection Plan). Based on the opinion of the biological experts who prepared the impact analysis and the recommended mitigation, the EIR concludes that, with these mitigation measures, the impacts would be reduced to less than significant.

- O9-10:** This comment states that, while Mitigation Measure BIO-22 describes the dimensions of the wildlife corridors, the EIR provides no evidence that maintaining corridors of this width will reduce impacts to less than significant. This comment asks whether the plans have been studied by a qualified biologist and corridors are of adequate dimensions for safe passage of wildlife, and whether there is peer-reviewed literature to support the mitigation

measure. Please refer to response to comment 3, which raises the same issue in this comment with respect to the internal wildlife corridor (Primary 2) and with respect to the qualifications of the wildlife biologist involved in designing and evaluating the corridors.

With respect to the western and northern eastern corridors that provide for regional wildlife movement and habitat connectivity, the Habitat Preserve abuts extensive preserved open space to the west and north. As such, the regional wildlife corridors are functionally much broader than just the corridor widths in the Habitat Preserve on the project site, as illustrated on Figure 4.3-10, Regional Wildlife Corridors. Therefore, the Habitat Preserve along the western and northern boundaries contributes to the regional wildlife movement and habitat connectivity within approximately 5 miles of the project site, including Goodan Ranch/Sycamore Canyon County Preserve to the north, County of San Diego open space to the east, and MCAS Miramar open space to west. From regional perspective, the proposed project would not substantially constrain wildlife movement and habitat connectivity.

- O9-11:** This comment asks whether there will be mitigation for edge effects to biological resources and the “manufactured” interior wildlife corridor’s proximity to residential communities. Please refer to response to comment O9-9, which raises the same issue raised in this comment with respect to edge effects.



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- 09-12

Streets “V” and “W,” which connect the Vineyard Village to Fanita Commons and Orchard Village are a dangerous component for wildlife as discussed in BIO-20. The mitigation provides for traffic-calming devices to allow wildlife to cross more safely. This is not sufficient for wildlife safety. **Could a motion sensor light detecting wildlife approaching the road that warns drivers with a signal? Can a wildlife biologist determine other safety measures beyond speed bumps and street signs? Are landscaping and design elements being used to encourage wildlife crossings in specific, planned areas?** This mitigation measure does not lessen the impact to Less than Significant.
- 09-13

Mitigation Measure BIO-23 details the wildlife undercrossing at the extension of Cuyamaca St. Even with the illustrations in Appendix D of crossing A, B, C and D, this measure doesn't provide any evidence this mitigation will be effective in lessening the impact of wildlife movement. **Will this Mitigation Measure be updated with data to support the claim that the undercrossing will lessen the hindrance of wildlife movement?** This mitigation measure does not lessen the impact to Less than Significant.
- 09-14

Mitigation Measure BIO-20 states, “In order to generally protect wildlife species, the following measures shall be implemented during construction.” First and foremost, during construction should be removed. These measures should be implemented indefinitely for wildlife protection. Measure 1 should include, when fencing is erected, it is wildlife safe that will prevent unnecessary snaring, or injuring wildlife. Measure 2 should include the forbiddance of intentionally destroying wildlife habitat. Measure 3 should include wildlife organization phone numbers for residents to call when they feel threatened by wildlife or observe injured wildlife to promote safety for residents and wildlife. Measure 4 should include an enforcement mechanism to protect the trails and preserves. Measure 5 should include a mandate for 15 mph speed limit when driving near wildlife corridors. **Will Mitigation Measure BIO-20 be updated to include these concerns?**
- 09-15

In Section 4.3.6 Cumulative Impacts and Mitigation Measures, there is an important exclusion. As noted in this DEIR by evaluating local and regional wildlife corridors was to access the degree to how the project site functions as a regional wildlife corridor and to adjacent lands to the project site. As to that purpose, this topic should be analyzed in the Cumulative Impacts Section. **Will this DEIR be updated to include a section that will adequately covering the impacts of this project on Wildlife Corridors?**

Sincerely,

James A. Peugh  
 Conservation Chair, San Diego Audubon Society

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**09-12:** This comment states that Streets “V” and “W” are dangerous components for wildlife and asserts that provisions for traffic-calming are not sufficient for wildlife safety and that Mitigation Measure BIO-20 would not reduce impacts to less than significant. This comment asks whether a motion sensor light could warn drivers of approaching wildlife, whether there other safety measures beyond speed bumps and signs to reduce impacts, and whether there are landscaping or design elements to encourage wildlife crossings in specific planned areas. Please refer to response to comment O9-7, which raises the same issue in this comment with respect to mitigation to reduce impacts to wildlife movement across Streets “V” and “W.”

With respect to motion sensors, many studies have employed aspects of technology (primarily wildlife cameras) to study wildlife patterns around infrastructure such as roadways, potential undercrossings, and rail systems. Huijser and McGowen (2003) reviewed 27 locations in the United States and Europe where animal-triggered motions sensors deployed warnings to drivers. These were primarily targeted for large ungulates and had widely varying coverage areas and were installed along large highway systems, not within neighborhoods. In order to deploy these effectively, a broad array of sensors would need to be deployed, which would cause their own additional landscape impacts. These systems

frequently experienced false positives, false negatives, and maintenance issues. Further, there are noted limitations regarding the size of species that can be reasonably detected for collision avoidance. While the concept seems reasonable, it is expected that it would be a technical challenge to implement a reliable system that helped protect a broad array of species while producing few false positives or negatives. While such a system may detect direct in-line movement of larger species across roadways, such as mountain lion, mule deer, bobcat, and coyote, it is hard to conceive of a system that would work with smaller, slower, and more erratically moving species, such as small mammals, reptiles, and amphibians, that are the most vulnerable to vehicle collisions. With a 25 mile-per-hour speed limit and other traffic-calming measures, the risk of collisions would already be reduced, so it is unlikely that any kind motion detection system would substantially contribute to further reduction.

No additional landscaping or design elements to encourage wildlife crossings in specific planned areas of Streets “V” and “W” are proposed as mitigation. As noted, larger and medium-sized wildlife are expected to primarily be active around the streets during the evening and night periods when vehicle use is greatly reduced, thus placing them at less risk. Lighting has been reduced to novel emergency push-button activated and timed

lighting within the day-use only preserve. The roads have been designed to be as narrow as possible and as natural as possible, with colored bedding to match the surroundings, rolled curbs, and minimal vegetation. Fencing and undercrossings would likely do little to protect smaller wildlife species during the day because the species would likely cross the road through the fencing at will.

- 09-13:** This comment states that Mitigation Measure BIO-23 for the wildlife undercrossing of the Cuyamaca Street extension does not provide any evidence that this mitigation will be effective in reducing impacts to wildlife movement. This comment asks whether Mitigation Measure BIO-23 will be updated with data to support the conclusion that the undercrossing will reduce impacts to wildlife movement.

It is not standard CEQA practice to include data in the text of a mitigation measure to support the efficacy of the mitigation measure. The data to support a mitigation measure are generally provided in the discussion of mitigation measures in the EIR or supporting technical reports, such as the Biological Resources Technical Report (Appendix D). Nonetheless, as stated in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife Species, the wildlife crossing would be adequate to convey wildlife species using the existing or manufactured topography because it is consistent with

the literature-suggested openness ratio for mule deer and other large mammals in Southern California. See response to comment O9-8.

**O9-14:** This comment references Mitigation Measure BIO-20 and makes the following recommendations: the term “during construction” should be removed, and the measures should be implemented indefinitely for wildlife protection; Measure 1 should include “when fencing is erected, it is wildlife safe that will prevent unnecessary snaring, or injuring wildlife;” Measure 2 should forbid intentionally destroying wildlife habitat; Measure 3 should include wildlife organization numbers that residents may call when they feel threatened by wildlife or observe injured wildlife; Measure 4 should include an enforcement mechanism to protect trails and preserves; and Measure 5 should include a mandate for a 15 mile-per-hour speed limit when driving near wildlife corridors. This comment asks whether Mitigation Measure BIO-20 will be updated to address these concerns.

The City agrees with the request that the term “during construction” be deleted from Mitigation Measure BIO-20 because it was not intended to be applicable to construction since the measures within it apply to permanent aspects of the proposed project. Additionally, the City agrees with the request to revise the measure to include wildlife safe fencing, intentional destruction of wildlife habitat, and the phone number of the Preserve

Manager. As for the requested revision for measures to protect the Habitat Preserve, the Preserve Management Plan (Appendix P of the Biological Resources Technical Report [Appendix D]) already addresses this issue (see Preserve Management Plan, Sections 4.4.1, 4.4.2.4, and 4.4.2.6 to 4.4.2.8). As for the requested revision to the speed limit, the City considers 25 miles per hour to be appropriate, and no revision is necessary. Therefore, this Mitigation Measure BIO-20 in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, has been revised to state the following:

**BIO-20: Wildlife Protection.** In order to generally protect wildlife species and habitat, the following measures shall be implemented ~~during construction~~:

1. Adequate fencing (i.e., wildlife safe that would prevent unnecessary snaring or injury) shall be erected to guide human users away from open space areas where open space abuts roads, parks, and trails. ~~Fencing locations shall be shown on the Construction Plans.~~
2. Covenants, Conditions, and Restrictions shall include a section that forbids collection of native wildlife (e.g., coast horned lizards, toads, snakes) without obtaining the necessary collection permits from California Department of Fish and Wildlife or the destroying of wildlife habitat.



3. Covenants, Conditions, and Restrictions shall include a notice describing the necessary role that coyotes, bobcats, and rattlesnakes have in the environment and shall make recommendations for keeping pets and pet food indoors and safe, and restrictions against controlling these and other native species unless there is a threat to life or property. The Preserve Manager's phone number and email address shall be provided for residents to call when they feel threatened by wildlife or observe injured wildlife.
4. Covenants, conditions, and restrictions shall include a notice describing the trail and preserve restrictions . . .

**O9-15:** This comment states that the evaluation of regional and local wildlife corridors should be added to Section 4.3.6, Cumulative Impacts and Mitigation Measures. Please see Section 4.3.6.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife Species, for the cumulative impact analysis of regional and local wildlife corridors.

### References

Clevenger, A.P. and N. Waltho. 2000. "Factors Influencing the Effectiveness of Wildlife Underpasses in Banff National Park, Alberta, Canada." *Conservation Biology* 14: 47–56.

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- Donaldson, B.M. 2005. The Use of Highway Underpasses by Large Mammals in Virginia and Factors Influencing Their Effectiveness. Virginia Transportation Research Council, Charlottesville, Virginia, VTRC 06-R2.
- Ogden. 1992. Baldwin Otay Ranch Wildlife Corridor Studies. Prepared for Otay Ranch Project Team, 146 pp.
- Reed, D.F., T.N. Woodward, and T.M. Pojar. 1975. “Behavioral Response of Mule Deer to a Highway Underpass.” *Journal of Wildlife Management* 39: 361–367.

## Comment Letter O10: San Diego Audubon Society, July 13, 2020



Fostering the protection and appreciation of birds, other wildlife and their habitats...

July 13<sup>th</sup>, 2020

Chris Jacobs, Principal Planner  
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 10601 Magnolia Avenue  
 Santee, California 92071  
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Subject: SDAS comments on Fanita Revised Draft EIR related to several species

O10-1

The San Diego Audubon Society (SDAS) is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. Our work has included invasive removal and revegetation events, training community scientists, advocating for developments and park management, educating school children about the importance of natural habitats, and many other projects. Over the years we have engaged with thousands of volunteers in carrying out these goals.

This letter is in addition to the points that are in the submitted comment letter from the Wildlife and Habitat Conservation Coalition. We are a signatory to that letter and support its comments and recommendations. SDAS is also submitting another comment letter that focuses on regional planning and wildlife movement corridors

O10-2

The coastal California Gnatcatcher is a Federal- and State-protected species. This species is also a part of the City of Santee's Draft Subarea Plan for protection (still in progress). This is acknowledged under Wildlife Resources, page 4.3-12, "Three of the bird species observed are MSCP Covered Species: coastal California gnatcatcher, coastal cactus wren, and least Bell's vireo." Listed in Table 4.3-4, Special-Status Wildlife Species Observed on the Project Site and Off-Site Improvement Areas, coastal California Gnatcatcher (CAGN) lists 4 pairs, 1 individual<sup>5</sup> and 39 Use Areas<sup>6</sup>. There is notice here that the 4 pairs/ 1 individual data is from 2005 and the 39 Use Areas is from 2016. It is unacceptable to use data from 15 years and 4 years ago for MSCP Special Status Wildlife Species. A current comprehensive survey must be performed to properly analyze for significance of impacts as required by CEQA. This is imperative when the DEIR states the following under Sensitive Wildlife Species, page 4.3-47, "Implementation of the proposed project would result in impacts to 987.58 acres of Critical Habitat for coastal California gnatcatcher, including both permanent and temporary impacts; however, only 399.19 acres would be considered suitable habitat for this species." How that conclusion was formed by impacting 60% of CAGN habitat, resulting in only 40% remaining habitat would be suitable habitat for the species, with 15-year old data, is bewildering and unacceptable. It is stated plainly in the DEIR, page 4.3-47,

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**O10**

**O10-1:** This comment provides an introduction to the comment letter and states that the letter is in addition to points that were submitted in comment letter from the Wildlife and Habitat Conservation Coalition (comment letter O12) and in another comment letter from San Diego Audubon Society (comment letter O9). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Refer to responses to letters O12 and O9, which address the comments provided in that letter. Therefore, no further response is required.

**O10-2:** This comment states that it is unacceptable to use data from 15 years and 4 years ago for MSCP special-status wildlife species, including those documented on the project site, California gnatcatcher (*Poliophtila californica californica*), cactus wren (*Campylorhynchus brunneicapillus sandiegensis*), and least Bell's vireo (*Vireo bellii pusillus*), and that current comprehensive surveys are required to properly analyze impacts under CEQA. This comment questions the validity of the analysis of permanent and temporary impacts to 987.58 acres of coastal California gnatcatcher Critical Habitat, of which only 399.19 acres of impacts would be considered suitable habitat for the species, relying on 15-year old data. The comment cites the EIR's conclusion

that the proposed project would result in direct loss of habitat for the majority of the special-status wildlife, including coastal California gnatcatcher. Citing the proposed Mitigation Measures BIO-1, BIO-14, BIO-18, and BIO-22, the comment states that these impacts cannot be mitigated to less than significant. The comment specifically refers to the 64 percent preservation of coastal California gnatcatcher use areas under Mitigation Measure BIO-1. The comment also refers to the interior wildlife corridor (Primary 2) and the northern corridor (Primary 3) but indicates that the latter would still function for wildlife movement of mountain lion (*Puma concolor*), coastal California gnatcatcher, and all other species. The comment concludes that the proposed mitigation measures are not adequate to reduce impacts to coastal California gnatcatcher to less than significant and that the EIR should be revised to state that impacts to coastal California gnatcatcher are significant and unavoidable.

With respect to the comment that current comprehensive surveys are required to properly analyze impacts under CEQA, there is no CEQA requirement that places a time limit or expiration on data that can be used in a technical analysis to support a CEQA analysis, only that the best available information be used. In fact, having a dataset from 15 years and 4 years ago provides valuable baseline information for the status of species in a given location

and can inform an impact analysis. In addition, the impact analysis includes modeled habitat suitability rather than numbers of pairs or individuals, including coastal California gnatcatcher use areas (that may not always be occupied from year-to-year), so temporal changes in vegetation communities are actually more relevant to the impact analysis than numbers of individuals or pairs of a species in any given year. For example, had a wildfire destroyed suitable habitat shortly prior to surveys, a habitat-based analysis would be suspect. As noted in Appendix D, Biological Resources Technical Report, the most recent fire on the project site was the 2003 Cedar Fire, allowing the major upland communities on site, including scrub, chaparral, and grasslands (see Table 4.3-1, Existing Vegetation Communities and Land Cover Types on the Project Site and Off-Site Improvement Areas, in Section 4.3, Biological Resources), to fully recover since the original 2004 vegetation mapping following the 2003 fire. The breadth of study has allowed a pre-fire/post-fire/recovery perspective on the resources on site, including transitioning use by grasshopper sparrow (*Ammodramus savannarum*) to coastal California gnatcatcher use for example.

As described in the Biological Resources Technical Report (Appendix D), 39 coastal California gnatcatcher use areas were detected on the project site during the

2016 focused surveys using USFWS survey protocols, with the majority in the southern portion (see Table 4-5, Special-Status Species Observed on Fanita Ranch, in Appendix D) which was consistent with the previous (2005) survey. A use area is defined as a specific area of modeled suitable habitat that each coastal California gnatcatcher pair was observed using (i.e., nesting and/or foraging in) during the surveys. As stated in Table 3-2, Suitable Habitat Models for Special-Status Wildlife Species Present or with Moderate Potential to Occur within the Project Area (including Off-site Areas), in Appendix D, modeled habitat for the coastal California gnatcatcher is based on the following vegetation communities: Diegan coastal sage scrub (including valley needlegrass grassland, baccharis-dominated, disturbed, non-native grassland, and fire-recovered varieties). There are approximately 1,471.4 acres of suitable coastal scrub habitat for coastal California gnatcatcher on the entire project site and a total of 2,407.4 acres of USFWS-designated Critical Habitat for coastal California gnatcatcher on the project site, 1,356.56 acres of which is modeled suitable habitat.

As noted above, the comment questions the validity of the analysis of permanent and temporary impacts to 987.58 acres of coastal California gnatcatcher Critical Habitat, only 399.19 acres of which would be considered suitable habitat for the species (see Table 5-5b, Impacts

to Vegetation Communities and Land Cover Types within Coastal California Gnatcatcher Critical Habitat Areas, in Appendix D) relying on 15-year old data. First, the habitat suitability model is based in vegetation mapping conducted in 2014, and the coastal California gnatcatcher use areas are based on 2016 surveys (see 3-1, Schedule of Surveys for Fanita Ranch, in Appendix D); therefore, the data for the impact analyses are not 15 years old. While total coastal California gnatcatcher Critical Habitat on site is 2,407.4 acres, based on the habitat model, 1,356.56 acres is considered suitable habitat based on the modeling. Therefore, the 399.19 impacted acres represent 30 percent of the total modeled suitable Critical Habitat on site (see Table 5-5b, Impacts to Vegetation Communities and Land Cover Types within Coastal California Gnatcatcher Critical Habitat Areas, in Appendix D). The remaining 588.39 acres of impacts is to non-suitable habitat despite inclusion in Critical Habitat.

It is the impacts to the 399.19 acres of suitable modeled Critical Habitat and 427.85 acres of suitable modeled habitat for the entire project site that are the basis for the proposed mitigation. Mitigation Measure BIO-1 (Preserve Management Plan) would preserve 1,017.61 acres of modeled suitable habitat (69 percent of the 1,471.41 acres total suitable habitat on site) and 25 of 39 (64 percent) of coastal California gnatcatcher use areas



O10-2 cont. "Implementation of the proposed project would result in the direct loss of habitat, including foraging habitat, for the majority of the special-status wildlife species described in Section 4.3.1.4, as well as those species with modeled suitable habitat and a moderate potential to occur on the project site. These species include the following: (includes) coastal California gnatcatcher." These are Significant Impacts that mitigation cannot bring to Less than Significant. The DEIR proposes the following mitigation measures to attempt this task, BIO-1, BIO-14, BIO-18, BIO-22. These are described in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species on page 4.3-57. BIO-1, which would conserve 1,017.61 acres of suitable habitat containing 25 Use Areas3 (64% preserved); Mitigation Measure BIO-2, which would restore 45.54 acres of temporary impacts to suitable habitat areas; Mitigation Measure BIO-14 which would require preconstruction nesting bird surveys in suitable habitat; and BIO-22, The project shall include an interior corridor that is minimally 1,200 feet wide and a northern corridor that is minimally 1,400 feet wide with the exception of one location that narrows to 600 feet for an approximate 800-foot length. This length is adjacent to the protected and managed Goodan Ranch/Sycamore Canyon Preserve to the north so it would still function for wildlife movement of mountain lion, coastal California gnatcatcher, and all other species. These mitigation measures are not adequate to bring the direct impacts to CAGN and their habitat from Significant to a level of Less than Significant. The DEIR should be updated to state that that impacts to CAGN are significant and unavoidable.

O10-3 Quino checkerspot butterfly is a special-status invertebrate and a Draft Santee MSCP Subarea Plan Covered Species. Threshold 1 identifies impacts to this species, which mitigation is not adequate to lower to Less than Significant. It is stated in the DEIR that Suitable habitat for the Quino checkerspot butterfly would be directly impacted by project implementation. Mitigation measure BIO-1 would conserve suitable habitat. BIO-18 would restore suitable habitat. These mitigation measures fail to lessen the severe impacts to the Quino Checkerspot butterfly. **Will the impacts in Threshold 1 be updated to Significant and Unavoidable?**

O10-4 There is a summary under Section 4.3.7, Comparison of Proposed Project to 2007 Project on page 4.3-135 that compares impacts from the 2007 Proposed project for this site and the current project in this DEIR. The main point is stated here "During the process of development approvals, the proposed project has become less impactful to land, habitat, and species." But the significant impacts cannot be denied as detailed in this Section, "The currently proposed project includes two development bubbles and impacts approximately 988.77 acres of on- and off-site sensitive habitats, 14 California gnatcatcher use areas, 14 basins occupied by western spadefoot, 53 acres of Hermes copper butterfly suitable habitat, and 111 vernal pools and road ruts (0.41 acres), 34 of which support San Diego fairy shrimp." The project site is a vital part of the City's MSCP and proximity to regional wildlife corridors as cited in Section 4.3.1.5 Wildlife Corridors and Habitat Linkages. Under the concerns stated in this letter, the following two alternatives in Section 6 attend to removing the unavoidable Significant Impacts discussed above. The first is in Section 6.1.2 on page 6-3, Alternate Location: "The Alternate Location would include building the proposed project in a different location from the current project site." The

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(see Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species), provide in-perpetuity management of the Critical Habitat for coastal California gnatcatcher included in the Habitat Preserve, and contribute to the conservation and recovery of this species. In addition, per Mitigation Measure BIO-14 (Nesting Bird Survey) preconstruction surveys would be conducted prior to construction to ensure that direct impacts to coastal California gnatcatchers would be avoided. If the species is observed, restrictions would be implemented. As stated in Table 4.3-20, Multiple Species Conservation Program Consistency Analysis, all clearing of suitable habitat would be outside of the nesting period as identified in the MSCP Plan area-specific management directives.

Based on the opinion of the biological experts who prepared the impact analysis and the recommended mitigation, the City disagrees with the comment that impacts to the coastal California gnatcatcher are not mitigated to a level of less than significant.

**O10-3:** This comment states that the proposed mitigation for Quino checkerspot butterfly (*Euphydryas editha quino*) is inadequate to reduce impacts to less than significant despite Mitigation Measure BIO-1 that would preserve habitat and Mitigation Measure BIO-18 that would restore suitable habitat. The comment asks whether the



impacts under Threshold 1 will be revised to significant and unavoidable.

The comment does not provide an explanation or basis for why it considers the proposed Quino checkerspot butterfly mitigation to be inadequate; therefore, this comment cannot be directly addressed. However, this response will briefly summarize the status of the species on the project site and the proposed mitigation for the species that supports the conclusion that the mitigation is adequate to reduce impacts to less than significant.

Focused surveys for Quino checkerspot butterfly were conducted in 2004, 2005, and 2016 in accordance with the USFWS 2002 and 2016 protocols, and host plant mapping occurred in 2016 and 2017 according to the USFWS 2014 protocol (see Section 3.2.7 in Appendix D). In these surveys, which included at least 413 person-days of effort, one detection of the species occurred in 2005 for 30 seconds on a knoll near the center of the project site.

While the EIR concludes that Quino checkerspot butterfly individuals do not currently occupy the project site, based on the negative protocol surveys in 2016 (which was considered an adequate year based on butterflies observed on other sites, including in Otay Lakes, San Vicente Reservoir [2.5 miles from the proposed project], Lake Riverside, and Cahuilla Indian

Reservation in Riverside County [i.e., across the species' range (see Figure 1, USFWS Quino Checkerspot Butterfly 2016 Observations, in Thematic Response – Coastal California Gnatcatcher), the EIR nonetheless estimated impacts to 581.39 acres of modeled suitable habitat (see Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species) based on the USFWS's current method of analysis. The project proposes to mitigate impacts to modeled suitable habitat for this species through preservation of 1,096.57 acres of suitable habitat through Mitigation Measure BIO-1 (Preserve Management Plan) and through Mitigation Measure BIO-18 (Restoration of Suitable Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly), which would restore and enhance suitable habitat through management and that would establish additional suitable habitat that could support future occupation by Quino checkerspot butterfly in the Habitat Preserve. It should be noted that the largest block of habitat is in excess of 900 acres, and while there have been no studies to determine how much habitat is needed to support a sustained population, there are a number of examples throughout its range of persistence in smaller patches (as identified by locations within 1km of one another), including Boulevard, Campo, Potrero, Jamul, Alpine, Ramona, and locations in Riverside County. In-perpetuity management of the Habitat Preserve would focus on removal of non-native grasses, weedy material,

and duff layers and the supplemental planting of host plant species so that habitat is more suitable for the species. The project design also provides for a primary wildlife corridors through the north-central portion (Primary 2), northern boundary (Primary 3), and western boundary (Primary 3) of the project site (see Figure 4.3.9, Local Wildlife Corridors). Therefore, the landscape-scale habitat connections for regional wildlife movement, including Quino checkerspot butterfly, would not be substantially affected by the proposed project. A review of recent Quino checkerspot butterfly detections in this region show a roughly linear distribution from Miramar to San Vicente and Ramona area that generally flows more northerly of the project site. Fanita Ranch would bolster this by providing the additional lands in the Habitat Preserve to the existing off-site preserved lands.

Based on the opinion of the biological experts who prepared the impact analysis and the recommended mitigation, the City disagrees with the comment that impacts to the Quino checkerspot butterfly are not mitigated to a level of less than significant.



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O10-4  
cont.

second is in Section 6.2.1, on page 6-1 No Project/No Build Alternative: "Under the No Project/No Build Alternative, the proposed project would not be built nor would any other project be built on the project site. The 2,638-acre project site would remain in its existing undeveloped condition without management. This alternative would eliminate all of the significant and unavoidable impacts identified for the proposed project."

Sincerely,

James A. Peugh  
Conservation Chair, San Diego Audubon Society

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**O10-4:** This comment references Section 4.3.7, Comparison of the Proposed Project to the 2007 Project, and states that “significant impacts cannot be denied” (presumably referring to the proposed project), citing text in the EIR describing impacts to habitat, coastal California gnatcatcher, western spadefoot, Hermes copper butterfly (*Lycaena hermes*), vernal pools and road ruts, and San Diego fairy shrimp. The comment points out that the project site is a vital part of the City’s MSCP and its proximity to regional wildlife corridors. Based on the concerns stated in the comment letter, the commenter references the two alternatives in Chapter 6 that would address removing the unavoidable significant impacts identified in the comment letter, including the Alternate Location in Section 6.1.2 and the No-Project/No Build Alternative in Chapter 6, Alternatives.

Please refer to responses to comments O10-2 and O10-3, which address the above comments regarding unavoidable significant impacts to coastal California gnatcatcher and Quino checkerspot butterfly, respectively, and which provide further explanation for the City’s conclusion that the impacts are less than significant with the recommended mitigation measures. Otherwise, comments regarding project alternatives that do not raise significant environmental issues regarding the adequacy or accuracy of information provided in the EIR will be passed on to decision-makers, and no further response is required.

## Comment Letter O11: San Diego Mountain Biking Association, July 13, 2020



**O11**

Chris Jacobs, Principal Planner  
 Subject: Fanita Revised Draft EIR  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071

Dear Mr. Jacobs:

The San Diego Mountain Biking Association (SDMBA) is a volunteer-driven, non-profit organization dedicated to maintaining and improving sustainable trail access for mountain biking in San Diego County. Formed in 1994, SDMBA is one of the largest regional trail advocacy organizations in the US with more than 1,400 members. We have elected to send a single comment letter during this period rather than many form letters from our members. While this letter is written from our organization, we represent the desire for improved trail access of our members and tens of thousands of mountain bikers in San Diego County.

SDMBA has been closely following this project since its inception. SDMBA has worked closely with all partners on the neighboring Mission Trails Master Plan update, Sycamore Canyon Trails Plan update, and the Stowe Trail Alignment. We have continued to play a supportive role for local jurisdictions and advocate for sustainable trails in the region.

After close examination of the Draft EIR, SDMBA is very supportive of the proposed trail plan, trail standards, and language around the implementation of the trails within the development/Habitat Preserve. The proposed trails plan is unique as the majority of proposed trails already exist on the ground. The few additions exist in the fringes of the development, many of these trails existing in the fuel modification zones or the urban interface.

Specifically, we appreciate the trail standards referenced as "2.5' or existing". This is consistent with most leading regional land managers including the City of San Diego's Trail Guidelines (Consultants Guide to Park Design & Development, Appendix K) and the County of San Diego Trail Guidelines (Preserve Trail Guidelines, Page 13). This also allows for a minimal infringement on the habitat, less impact during trail construction, and more natural experience for the user on the trail.

Further, we would appreciate it if the City of Santee again would consider reducing the width of the Perimeter Trail around the North East (Vineyard Village) of the project. The current proposed trail is 8' wide, requiring a brow ditch along the whole length, with an in slope this trail will require ongoing maintenance in perpetuity. A narrow, natural trail with grade reversals could

**O11-1:** This comment provides an introduction to the comment letter and expresses support for the proposed project and the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O11-2:** The comment requests that the applicant reconsider reducing the width of the perimeter trail around Vineyard Village. The width of the perimeter trails is purposefully 8 feet wide to accommodate emergency vehicles. The applicant will continue to work with the Santee Fire Department to reduce the width as much as possible while still accommodating emergency access and drainage requirements. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

O11-1

O11-2

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 P.O. Box 881491, San Diego, CA 92168  
 501(c)3 #20-1701837



O11-2  
cont.

be achieved with limited impact, less erosion, maintenance, and potentially lessen the overall impact of the project on the natural area by decreasing the need for fill material. This trail could still achieve the need for maintaining the fuel modification zone and fire/emergency access.

Although the impacts of mountain biking as compared to hiking have been referenced in comments from stakeholders, the research-based consensus is there is little difference in impact between the two activities. We appreciate that the applicant has gone through the trouble of already quoting several of these scientific studies. Both activities are passive, human-powered activities and in many cases, mountain bikers are the least likely group to travel off-trail. The current concerns around fragmentation of habitat and impacts of non-consumptive recreation have continued to be expressed by parties throughout the region and the entitlement process. The existing trail network on the property has been used at a high volume for decades by hikers, mountain bikers, and OHV's. The proposed plan would actually lessen the current disturbances in the Habitat Preserve with the introduction of a management plan and closure of redundant/unsustainable trails. The oversight provided by the management plan of the Preserve would also remove or lessen the OHV activity in the area significantly. With the removal of OHV activity in the area, reduction of trails, and active management significant areas of the Preserve would see less human activity and provide significant core habitat that does not currently exist.

O11-3

The level of detail the applicant has gone into specifically in "App D\_Biological Technical Report, Appendix T" is impressive. Many of the problems we see in Preserve Management around San Diego County stem from lacking or non-existent management plans. Several popular urban open spaces do not suffer from a proliferation of non-system trails or off-trail activities even though they attract significant crowds. Specifically, Black Mountain within the City of San Diego has a very popular trail network. This network of trails was well planned out and implemented by the City of San Diego. The City also worked with a large number of stakeholders including SDMBA. SDMBA not only helped in planning the trails, but we assisted the City in implementation through volunteer events. This created a significant opportunity for trail users to be part of the process of trail creation and has led to the stewardship of these trails. Not to mention all the new trails constructed were done in a sustainable manner and have required little to no maintenance.

In contrast, several areas in San Diego County suffer from a lack of management, stewardship, or plan and have battled the proliferation of significant new trail creation for decades. We believe this management plan takes into account significant feedback from the community, incorporates local and national examples for trail management. This combination along with the sustainable implementation of the trails will result in the successful management of the Preserve and the maintained integrity of the habitat.

The connectivity between Fanita Ranch and the surrounding trail community is critical. The proposed trail networks not only connect to Mission Trails, and Sycamore Canyon, but also continues further into the County by regional trail alignments. From Sycamore Canyon you can

**O11-3:** This comment provides additional support for the proposed project and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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O11-3  
cont.

connect through the Trans-County trail to Penasquitos Canyons, Del Mar Mesa, and then on to San Dieguito River Park or Black Mountain Open Space Park. These connections are not only vital for the County but the many residents of Santee who have limited trail opportunities for nature-based trails in their City. With most of Santee developed, the proposed trail network contained within this project will be one of the only opportunities for the current and future residents of Santee to get outside to experience nature.

The well being of communities can be directly related to the readily available access to nature and trails. Research shows there is a direct and significant measurable correlation between how close people live to biking and walking infrastructure and the amount of weekly exercise they get. Not only do communities with high-quality trail infrastructure see health improvements in their citizens, but those health improvements translate into real medical savings for those communities.

Although SDMBA is primarily focused on trail advocacy we are not ignorant of the facts around our County. We work with nearly every land manager in the County and have a deep appreciation for the biodiversity in San Diego County and the natural communities that exist within it. We believe that trails provide the mechanism that creates stewardship for these preserved areas. The ability to see and experience our preserved lands creates a connection between the community and nature. This connection results in stewardship of the trails, but also a sense of ownership of the lands we all intend to preserve and protect.

We support the proposed trail plan because it is a model of an applicant working with the community and shaping a plan based on feedback from the community. We also support the trails plan because the trails within the development are unique and already popular within our community. We believe that someone needs to speak for trails and the future of our communities. There are voices speaking for wildlife, fire, traffic, botany, biology, schools, infrastructure and we are the continued voice for the trails. Without well planned and sustainable public access to the preserved areas within this development, we will be condemning these lands to a perpetual cat and mouse game that is reflected in poorly planned preserves across the County. We implore the City of Santee to focus on the value of these trails for the future residents of this region and the current community that resides within Santee.

Sincerely,



Susie Murphy  
Executive Director

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## Comment Letter O12: Wildlife and Habitat Conservation Coalition, July 13, 2020

### Wildlife and Habitat Conservation Coalition

*Dedicated to the sustained conservation of native animal and plant species in the Southwest Bioregion.*

July 13, 2020 REVISED

Mr. Chris Jacobs, Principal Planner  
 Department of Development Services  
 Santee City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071  
 Email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)



**O12**

**Subject: Fanita Ranch Revised Draft Environmental Impact Report (RDEIR)**

Dear Mr. Jacobs,

- O12-1

The undersigned members of the Wildlife and Habitat Conservation Coalition offer the following comments on the above referenced item. We are also writing in support of the comments of Preserve Wild Santee filed separately and in greater detail.
- O12-2

Fanita Ranch is a regional asset. Fanita is core biological habitat and linkage within the Multiple Species Conservation Plan (MSCP). As disclosed by the RDEIR, Fanita provides habitat, including designated critical habitat, for numerous sensitive, threatened, and endangered species. Nearly all of the 2,600-acres is critical habitat for the coastal California gnatcatcher and the Hermes copper butterfly. All of Fanita is considered for inclusion within a northern unit of a Quino checkerspot butterfly recovery area.
- O12-3

The mitigation measures proposed by the RDEIR are not sufficient to mitigate the biological impacts to a level of insignificance. Impacts to species should be avoided by substantial reduction in the acreage directly impacted by the project or consider the feasibility of a total conservation sale.
- O12-4

Adding over 8,000 people to a remote site configured as bubbles of leap-frog development in a wildfire corridor has massive edge effects and fails to meet NCCP standards. The edge effects upon Fanita Ranch open space and the adjacent offsite open space preserves are not mitigated to a level of insignificance.
- O12-5

We are also concerned about the cumulative climate impacts generated by the huge increase in Vehicle Miles Traveled (VMT) and find that the impact of these have not been adequately addressed.

**O12-1:** This comment provides an introduction to the comment letter and refers to comment letters provided by another organization (Preserve Wild Santee). The Preserve Wild Santee comment letters are addressed as Comment Letters O7 and O8. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**O12-2:** This comment provides a general summary of the habitat values on the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. As depicted on Figure 2-1 in Appendix D (Biological Resources Technical Report) of the EIR, much of the site has been designated as Critical Habitat (coastal California gnatcatcher [*Polioptila californica californica*]) or proposed Critical Habitat (Hermes copper butterfly [*Lycaena hermes*]), though, based on the opinion of the biologist experts who prepared the Biological Resources Technical Report (Appendix D), the City of Santee (City) disagrees with the proposal for Hermes copper butterfly and believes that it greatly exaggerates the project site’s value due to the likely extirpation of the species and presence of only 149 acres of suitable habitat as mapped using protocol methods.

Please refer to Thematic Response – Hermes Copper Butterfly. No further response is required.

- O12-3:** This comment also states that the mitigation measures proposed by the EIR are not sufficient to mitigate the biological impacts to a level of insignificance. The comment does not state which mitigation measures are insufficient or explain why the commenter considers the measures insufficient. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also states that impacts to species should be avoided by substantial reduction in the acreage impacted by the proposed project or that consideration should be given to the feasibility of a total conservation sale of the project site.

Table 6-2, Summary of Impacts for Alternatives Compared to the Proposed Project, in Section 6.3, Environmentally Superior Alternative, in the EIR summarizes all alternatives compared to the proposed project, including multiple reduced acreage alternatives and a No Project/No Build Alternative. The EIR acknowledges that the No Project/No Build Alternative and the reduced acreage alternatives would have less biological resources impacts compared to the proposed project. This comment does not raise a significant

environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- O12-4:** This comment states that the proposed project would be in a remote site in a wildlife corridor and that the proposed project fails to meet Natural Community Conservation Program standards. The comment also states that the edge effects on the proposed project open space and the adjacent off-site open space preserves are not mitigated to a level of insignificance.

The project site is not in a remote area since the proposed project occurs adjacent to existing development along its southern, eastern, and a portion of its western boundaries. Regarding the comment's description of the proposed project as "leap frog," the southern portion of the project site is included in the Habitat Preserve to avoid impacts to occupied habitat for coastal California gnatcatcher and other species that use coastal sage scrub. The Habitat Preserve in this area would consist of a 900-acre habitat block, with connectivity to other preserves in the vicinity generally by 1,000 feet or more. As stated in Section 4.3.1.5, Wildlife Corridor and Habitat Linkages, in the EIR, the entire project site currently functions as a habitat block with no distinct wildlife corridors or linkages. Regarding the failure to meet Natural Community Conservation Program standards, the City is in the process of completing the Santee

Multiple Species Conservation Program (MSCP) Subarea Plan. Although the Draft Santee MSCP Subarea Plan has not yet been approved or permitted, it has been prepared using Natural Community Conservation Program standards, as required by statute, and is used as the guidance document for projects occurring in the City. If the Santee MSCP Subarea Plan is not approved, the proposed project would seek take authorization through alternatives such as federal Endangered Species Act Section 7 or an individual Section 10 permit.

The EIR identifies potentially significant indirect impacts, including noise, vibration, lighting, increased human activity, altered fire regimes, and increased roadkill, on wildlife movement in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species. The EIR concludes that development of the proposed project would result in significant indirect impacts to wildlife movement corridors both on and off site. The EIR proposes several mitigation measures to reduce these potential indirect effects to less than significant. As described in detail in Section 4.3.5.4, Mitigation Measure BIO-22 (Wildlife Corridors) includes measures to direct lighting away from the Habitat Preserve and control public and pet access to trails. Other mitigation measures that would reduce indirect impacts include Mitigation Measure BIO-1 (Preserve Management Plan), Mitigation Measure BIO-

6 (Land Use Adjacency Guidelines), Mitigation Measure BIO-9 (Habitat Preserve Protection), Mitigation Measure BIO-10 (Weed Control Treatments), Mitigation Measure BIO-20 (Wildlife Protection), and Mitigation Measure BIO-21 (Fire Protection Plan). Therefore, based on the opinion of the biological experts who prepared the analysis of impacts and the recommended mitigation measures, all indirect impacts to biological resources contained in the Habitat Preserve would be reduced to less than significant. Please refer to the Thematic Response – Wildlife Movement and Habitat Connectivity.

- O12-5:** This comment states that cumulative climate impacts generated by the increase in vehicle miles traveled has not been adequately addressed. Section 4.17, Greenhouse Gas Emissions, and the Greenhouse Gas Analysis (Appendix H) prepared for the proposed project analyze the proposed project’s greenhouse gas emissions associated with vehicle miles traveled and the cumulative impacts from surrounding projects. The EIR identified appropriate mitigation to reduce those impacts to the extent feasible in accordance with the CEQA Guidelines, Section 15126.4.

012-6 Even without recognition of our points above, the RDEIR identifies significant unavoidable impacts to transportation, air quality, noise, utilities and recreation. The significant impacts that we have identified combined with the significant unavoidable impacts disclosed by the RDEIR provide grounds for our recommendation for denial of the project as proposed.

Sincerely,  
*Pamela Heatherington, Environmental Center of San Diego*  
*Dan Silver, Endangered Habitats League*  
*Duncan McFetridge, Cleveland National Forest Foundation and Save our Forests and Ranchlands*  
*Tina Iki, Escondido Neighbors United*  
*Bill Tippets, Southwest Wetlands Interpretive Association*  
*James A. Peugh, San Diego Audubon Society*  
*Frank Landis, California Native Plant Society, San Diego Chapter*  
*Joan Herskowitz, Buena Vista Audubon Society*  
*Matthew Vasilakis, Climate Action Campaign*  
*Karin Zirk, Friends of Rose Creek*  
*Van Collinsworth, Preserve Wild Santee*  
*Marco Gonzalez, Coastal Environmental Rights Foundation*  
*Matt O'Malley, San Diego Coastkeeper*  
*Diane Nygaard, Preserve Calavera*  
*NeySa Ely, San Pasqual Valley Preservation Alliance*  
*George Courser, San Diego Chapter of the Sierra Club*

**012-6:** This is a closing comment summarizing information disclosed in the EIR. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I1: Betsy Burke, May 29, 2020

I1

**I1-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I1-2:** This comment asks if studies have been conducted on fire safety for the proposed project. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the project-specific Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.


**I1-3:** This comment states the commenter’s experience of wildfire and suggests brush should be cleared over 25 acres to keep the area safe. See response to comment I1-

From: Betsy Burke <betsyburkedesign@gmail.com>  
 Sent: Friday, May 29, 2020 4:00 PM  
 To: Chris Jacobs <CJacobs@CityofSanteeCa.gov>  
 Subject: Draft Revised Environmental Impact Report for Fanita Ranch

I1-1 Hi Chris,  
 Hope you are doing well. I saw we could give our input on your Environmental Impact Report for Fanita Ranch so here are my concerns:

I1-2 Have there been studies one fire safety of this plan? I don't think one fire department in the development plan for Fanita Ranch and the CDF would be able to save this area if we have a Santa Ana wind fueled fire like we did during the Cedar Fires as the Barona Fire Department and CDF were unable to stop deaths and homes burning on Wildcat Canyon Rd. in Lakeside, CA.

I1-3 Being locked behind the hill there with only two exits would make it just as dangerous as living off of Wildcat Canyon Rd. The only thing that saved my life when I worked at the casino during that fire was the golfcourse to the north. You would have to clear brush back over 25 acres to make that area safe and that will not go well if you want to keep canyons in that area.

I1-4 The Fanita Ranch area burned during the Cedar Fire in 2003 too and it burned for several days after October 26, 2003:  


I1-5 Also you can add that it this area of Santee is critical habitat for several endangered species?  
 Here are a few endangered species that live in the area of Fanita Ranch:  
 Least Bell's Vireo  
 Southwestern Willow Flycatcher  
 Stephens' Kangaroo Rat  
 Pacific Pocket Mouse

I1-6 Threatened species that live in the area of Fanita Ranch:  
 Coastal California gnatcatcher

I1-7 Pending endangered species:

2, which addresses the EIR's analysis of wildfire and evacuation. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I1-4:** The comment states the project site burned during the Cedar Fire in 2003. The EIR acknowledges that the project site has experienced fire in the past. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I1-5:** This comment states that this area of the City of Santee is Critical Habitat for several endangered species, including least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), Stephens's kangaroo rat (*Dipodomys stephensi*), and Pacific pocket mouse (*Perognathus longimembris pacificus*). Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, fully analyze potential impacts to Critical Habitat for these endangered wildlife species.

As discussed in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, potentially significant impacts to suitable nesting habitat for least Bell's vireo would be reduced to less than significant



through the proposed project's on-site Habitat Preserve outlined in Mitigation Measure BIO-1, which would conserve 3.71 acres of suitable habitat (46 percent preserved). Additionally, implementation of Mitigation Measure BIO-14 would require preconstruction nesting bird surveys in suitable habitat, Mitigation Measure BIO-17 would remove brown-headed cowbird (*Molothrus ater*) from the project site, and Mitigation Measure BIO-15 would restore 0.46 acre of temporary impacts in suitable wetland habitat areas.

As discussed in Section 4.3.5.1, southwestern willow flycatcher has a low potential to nest on site since only one southwestern willow flycatcher was observed in May 2017 during focused surveys and was not observed during subsequent visits. In accordance with the survey protocol guidelines, this individual was determined to be a migrant subspecies and not southwestern willow flycatcher. Therefore, direct impacts to breeding southwestern willow flycatchers would not occur.

Regarding Stephens's kangaroo rat and Pacific pocket mouse, these species were determined to have no potential to occur on the project site, and significant impacts would not be likely to occur to these wildlife species from implementation of the proposed project.

Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that impacts to

sensitive wildlife species and Critical Habitat for these species would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

- I1-6:** This comment states that threatened species that live in the area of the proposed project include coastal California gnatcatcher (*Polioptila californica californica*). Section 4.3 and Appendix D fully analyze potential impacts to the threatened coastal California gnatcatcher. As discussed in Section 4.3.5.1, potentially significant impacts to coastal California gnatcatcher would be reduced to less than significant with implementation of Mitigation Measures BIO-1 (Preserve Management Plan), which would provide a long-term management plan for the Habitat Preserve, and BIO-6 (Land Use Adjacency Guidelines), BIO-9 (Habitat Preserve Protection), BIO-10 (Weed Control Treatments), and BIO-11 (Argentine Ant Control and Monitoring) would reduce the potential impacts of edge effects, maintain suitable habitat, and provide fire management. Preconstruction surveys would be conducted prior to construction to ensure that direct impacts to coastal California gnatcatcher would be avoided (BIO-14, Nesting Bird Survey). If coastal California gnatcatcher is observed, restrictions would be implemented. Clearing of suitable habitat would be outside of the nesting period as identified in the area-specific management directives as directed by

Mitigation Measure BIO-14. The EIR concludes that impacts to coastal California gnatcatcher would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR. Please also refer to Thematic Response – Coastal California Gnatcatcher for further discussion on this topic.

- 11-7:** This comment lists Hermes copper butterfly (*Lycaena hermes*) as a pending endangered species. Section 4.3 and Appendix D fully analyze potential impacts to Critical Habitat for the Hermes copper butterfly. As discussed in Section 4.3.5.1, potentially significant impacts to Hermes copper butterfly would be reduced to less than significant through the proposed project's on-site Habitat Preserve outlined in Mitigation Measures BIO-1 and BIO-18, which would conserve 94.77 acres of potential suitable habitat containing two historical locations. The EIR concludes that impacts to this species and Critical Habitat for this species would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR. Please also refer to Thematic Response – Hermes Copper Butterfly for further discussion on this topic.

11-7 Cont. The Hermes Copper Butterfly is pending as an Endangered Species:  
<https://www.federalregister.gov/documents/2020/01/08/2019-28461/endangered-and-threatened-wildlife-and-plants-threatened-species-status-for-the-hermes-copper>  
 Map of territory of the Hermes Copper Butterfly includes Fanita Ranch and how this will effect housing projects:  
<https://dudek.com/hermes-copper-butterfly-may-be-listed-as-a-threatened-species-what-that-means-for-your-projects/>

11-8 Also the citizens of Santee, including myself, voted no on Fanita Ranch several times when there were other developers trying to build there, how is this one in the works without our vote?

11-9 There should be traffic impact studies done when businesses are all reopened. Prior to the California COVID-19 shutdown order on March 19th there was over a 30-45 minute backup on surface streets just to access the 52 during morning rush hour, not counting 1-2 hours of backup when there have been traffic accidents. If a brushfire occurs during rush hour it would be a recipe for disaster for people, especially if they lived in Fanita Ranch.

11-10 So basically, fire, endangered / threatened species, and traffic congestion are my main three concerns. Hope this helps you to write your next draft.  
 Thanks and stay safe! ;)

Betsy Burke  
 Santee, CA

**11-8:** This comment states that the citizens of Santee voted no on past proposals for the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**11-9:** This comment states there should be traffic impact studies done when businesses have reopened after the COVID-19 shut down. The comment states that there were traffic backups on surface streets to access State Route 52 during morning rush hour. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The transportation analysis was based on a pre-COVID-19 baseline. As discussed in Section 4.16 and Appendix N the existing average daily traffic volumes were analyzed based on traffic, intersections, bicycle, and pedestrian counts conducted in January and February 2018 while schools were in session. This issue is adequately addressed in the EIR.

The comment also states that, if a brushfire occurs during rush hour, it would be a disaster for people living in the

proposed project. Section 4.18, Wildfire, and Appendices P1, Fire Protection Plan, and P2, Wildfire Evacuation Plan, analyze the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR.

- I1-10:** This comment restates the commenter's concerns with fire, endangered/threatened species, and traffic congestion. Please refer to responses to comments I1-2 and I1-9 regarding wildfire, I1-5 through I1-7 regarding sensitive wildlife species, and I1-9 regarding traffic congestion.

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## Comment Letter I2: Nelly Purvis, May 29, 2020

I2

From: Nelly Purvis <[nmartin7687@hotmail.com](mailto:nmartin7687@hotmail.com)>  
 Sent: Friday, May 29, 2020 2:39 PM  
 To: Chris Jacobs <[CJacobs@CityofSanteeCa.gov](mailto:CJacobs@CityofSanteeCa.gov)>  
 Subject: Fanta project

Good afternoon,

I2-1 I'm a resident here in Santee and I've noticed there's a possibility that the Fanita Ranch project might be approved pending certain requirements. Before this whole Corona situation, the traffic commute getting onto the 52 freeway has been a living nightmare. Adding more homes to this specific area is just absolutely ridiculous. On a regular weekday workday morning commute, it took me over 45 minutes just to get on the freeway alone from Mast Blvd heading to my work in Miramar. During after hours, without the huge crowds fighting to get onto the freeway, it would be about 10 minutes from my home. I mean that should speak volumes on how insane it would be to add hundreds more people in an already crowded section adding more pollution and traffic.

I2-2 Also, the residents of Santee have enjoyed those trails, it's our only way closest to our area to enjoy the wildlife and the beauty that section the land has to offer. I've seen different types of animals, from a herd of Jack rabbits, multiple species of birds, and many other animals. It's really a great place and by adding these extra homes would be a detriment to our community, especially in that specific location. We have too much traffic and noise in that section during our early commute. I even feel that adding man made trails with the development doesn't even match the realness of an open space filled with wildlife and trails. The added homes will take away the realness of a real open space. Please consider this plea. I don't have the money to "pay out" certain agencies like the developers do but I can speak for all the families and avid hikers who enjoy that open space. I just recently took my 7 year old there to the Rock trail and he was just ecstatic about all the boulders, such a satisfaction to be able to share whatever nature we have left.

I2-3 I have served for the U.S Navy dedicating most of my time away from family. And now I work at a military prison, the one thing that is the most therapeutic is that open space. Nature and trails are medicine to the soul, a time to reflect and enjoy time away from the busy city.

Very Respectfully,

Nelly Purvis  
 626)290-1820  
 Home owner of Santee.

1

I2-1: This comment describes the commenter's experience with traffic in the City of Santee prior to the COVID-19 pandemic. The transportation analysis was based on a pre-COVID-19 baseline. As discussed in Section 4.16, Transportation, and Appendix N, Traffic Impact Analysis, the existing average daily traffic volumes were analyzed based on traffic, intersections, bicycle, and pedestrian counts conducted in January and February 2018 while schools were in session. This issue is adequately addressed in the EIR.

I2-2: This comment describes the commenter's experience enjoying the trails and wildlife in the City of Santee and their dissatisfaction with the traffic and noise during the morning commute. As discussed in Section 4.15, Recreation, the proposed project would provide new recreational amenities, including 78 acres of public and private parkland for active and passive recreation and 4.5 acres (approximately 4.8 miles) of trail land consisting of the perimeter trail and Stowe Trail connection for a total of 82.5 acres. The proposed project would provide over 35 miles of trails (23 acres), including the perimeter trail and Stowe Trail connection. This parkland and 25 miles of the trail system could be accessed by the public at large and proposed project residents. In addition, the proposed project would create a Habitat Preserve

totaling 1,650.4 acres for the conservation of plant and wildlife species and the habitats that support these species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- I2-3:** This comment describes the commenter's service in the U.S. Navy and their enjoyment of the open space and trails. Please refer to response to comment I2-2 for a summary of the trails provided by the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I3: Sharon Reeve, May 29, 2020

**I3**

**I3-1:** This comment states that the proposed project would result in potentially significant, unavoidable impacts related to air quality, noise, recreation, transportation, and utilities. This information is disclosed in the EIR. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I3-2:** This comment states that the proposed project conflicts with the Santee General Plan. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project's potential to cause a

From: Sharon Reeve <sharon\_reevelamesa@gmail.com>  
 Sent: Friday, May 29, 2020 2:55 PM  
 To: Chris Jacobs <Cjacobs@CityofSanteeCa.gov>  
 Subject: Fanita Revised Draft EIR

Chris Jacobs, Senior Planner,

I3-1 Based upon...conclusions in the Draft Revised EIR, the project would result in potentially significant, unavoidable environmental impacts related to: i) air quality; ii) noise; iii) recreation; iv) transportation; and v) utilities.

I3-2 The project does not comply with the Santee General Plan and should not be approved. I don't want more development where it destroys habitat. There are plenty of malls, big box stores, and other large abandoned sites to build on. Build there instead. Quit destroying beautiful land.

Sincerely,  
 Sharon Reeve, La Mesa

significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

This comment also states that the commenter does not want more development where it destroys habitat and that there are malls, big box stores, and abandoned sites to build on, but does not provide additional information related to the location or size of these sites. Section 4.3.5.2, Threshold 2: Riparian Habitat and Other Sensitive Natural Communities, in Section 4.3, Biological Resources, analyzes impacts to sensitive

habitat. The EIR concludes that implementation of Mitigation Measures BIO-1, BIO-2, BIO-6 through BIO-12, and BIO-15 would mitigate all direct and indirect permanent and temporary impacts to riparian habitats and other sensitive natural communities to below a level of significance. This issue is adequately addressed in the EIR.

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### Comment Letter I4: Kacy Fischer, May 30, 2020

I4

From: Kacy Fischer <kacyfischer@gmail.com>  
Sent: Saturday, May 30, 2020 9:25 AM  
To: Chris Jacobs <CJacobs@CityofSanteeCa.gov>  
Subject: No to Fanita Ranch

Dear Mr. Jacobs,

- I4-1 After reviewing the Fanita Ranch EIR, I would like to express my concern with the project.
- I4-2 The Fanita Ranch plan will cause even more traffic and congestion in our town, which is already unbearable at rush hour.
- I4-3 I'm also very concerned about evacuation safety should a wildfire occur in the hills.
- I4-4 The Fanita Ranch project will destroy the open spaces that make Santee beautiful and provide a home to so many plant and animal species.
- I4-5 Please do not support the Fanita development.

Sincerely,  
Kacy Fischer

**I4-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I4-2:** This comment states the proposed project will cause even more traffic and congestion in the City of Santee (City). Section 4.16, Transportation, in the EIR analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**I4-3:** This comment states the commenter’s concern with evacuation safety should a wildfire occur in the hills. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the

information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR. Please also refer to Thematic Responses – Fire Protection and Safety and Evacuation.

- I4-4:** This comment states that the proposed project will destroy the open spaces that make the City beautiful and provide a home to many plant and animal species. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, fully analyze potential impacts to sensitive plant and wildlife species. Based on the opinion of biological experts who prepared the analysis, the EIR concludes that impacts to sensitive plant and wildlife species would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.
- I4-5:** This comment states that the commenter does not support the proposed project. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I5: Bernie Parmer, June 3, 2020

Chris Jacobs

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**From:** btparmer <btparmer@cox.net>  
**Sent:** Wednesday, June 3, 2020 4:51 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

15-1 As a longtime Santee resident I am opposed to more traffic, more noise, and destruction of what little wild space we have left. I'm opposed to Fanita Ranch. Citizens should have a chance to vote on this.

Bernie Parmer

Sent from my T-Mobile 4G LTE Device

I5

15-1: This comment states the commenter's opposition to more traffic, noise, destruction of wild space, and the proposed project. The comment also states that citizens should have a chance to vote on the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I6: Michael Ranson, June 10, 2020

I6

I6-1:

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**From:** M Ranson <m.ranson.santee@gmail.com>  
**Sent:** Thursday, June 11, 2020 4:09 PM  
**To:** Chris Jacobs  
**Subject:** Fwd: Non Agenda Public Comment for Mtng 6/10/20

----- Forwarded message -----  
From: **M Ranson** <m.ranson.santee@gmail.com>  
Date: Wed, Jun 10, 2020 at 5:13 PM  
Subject: Non Agenda Public Comment for Mtng 6/10/20  
To: <cityclerk@cityofsanteecc.gov>

Mayor and Council,

The Fanita Ranch decision is likely one of the biggest decisions you will make for the future of our city. Your vote will greatly impact our city for decades or longer if you ultimately choose to approve the project.

Anyone who is paying attention to the Fanita Ranch project knows that there is a very small Political Action Committee in our community that will work to lower the level of the Fanita Ranch discussion. Accusations of corruption, political payoffs and tales of deceptive or unethical cooperation between our city and the developer will be made. Supporters of the project will be accused of being political operatives for the developer. Division and confusion appear to be the chosen tactic for reaching the goal of preserving this wild area of Santee.

I6-1

For these reasons, I request that the city work proactively to make the public comment portion of the EIR review as easy as possible for the citizens of Santee. I would like to suggest that our city website have a front page Fanita Ranch INFO button that links to a user friendly web page where all info on Fanita Ranch can be found. I would also like for the city to start thinking about how it will handle public comments when the project comes before council. Will COVID 19 impact this process? Can we add ways for the public to be heard? Let's think big, think transparent and be proactive about the process. I would encourage you to consider that the more input from the community, the better. Let's work to arrive at a decision about Fanita Ranch based on facts, thoughtful community input and remembering that we are all neighbors in a city about to make an enormous decision for our future.

Respectfully,  
Michael Ranson  
Santee Resident

This comment describes the political environment surrounding the proposed project and provides suggestions to the City of Santee (City) with regard to providing project information and obtaining public comments at the City Council meeting. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

Note that during the 45-day public review and comment period, copies of the Draft EIR and technical appendices for the proposed project were available for review and inspection at City Hall and on the City's website. These documents can be accessed on the City's website using the button on the homepage that is titled "Environmental Notices and Docs" or using the button on the homepage under "News" that is titled "Draft Revised Environmental Impact Report for Fanita Ranch Project." Both buttons take the reader to the Notice of Availability of the Draft Revised EIR with links to the EIR and technical appendices, as well as a link to the administrative record for the proposed project. The City has received extensive written comments on the EIR via mail and email.

Further, public comments will be accepted at the City Council hearing for the proposed project. The public

hearing will occur during a regularly held City Council meeting and will be conducted via webinar and telephonically pursuant to the provisions of the Governor's Executive Order, which suspends certain requirements of the Ralph M. Brown Act due to COVID-19. Live public comments will be made available. More information can be found on the City's website at <https://www.cityofsanteeca.gov> using the button "Agenda/Minutes," including further instructions on how to access the meeting once the meeting has been noticed and the agenda materials for the meeting have been posted.

## Comment Letter I7: Rosemary Hutzley, June 11, 2020

**I7**

**I7-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I7-2:** This comment states that more taxes will result from pension costs and salaries for additional fire and police. This comment raises economic issues that are not treated as significant effects on the environment and do not need to be evaluated in the EIR per CEQA Guidelines, Section 15131. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I7-3:** This comment states that there will be larger local taxes for road repair, sewage replacement or repair, and other infrastructure. The applicant would be responsible for implementing and paying for any improvements related to the proposed project. This comment raises economic issues that are not treated as significant effects on the environment and do not need to be evaluated in the EIR per CEQA Guidelines, Section 15131. This comment does not raise a significant environmental issue regarding

From: Rosemary Hutzley <rosehut26@yahoo.com>  
 Sent: Thursday, June 11, 2020 10:11 AM  
 To: Chris Jacobs <CJacobs@CityofSanteeCa.gov>  
 Subject: Comments regarding general plan EIR-Fanita Ranch Please read all 9 points and summary

Dear Mr. Jacobs,

I7-1 First and foremost, I am against the idea of building Fanita Ranch for a multitude of reasons not just the obvious:

I7-2 1. Pension Costs and Salaries for additional Fire and police-167 Billion pension shortfall currently in Ca.-more taxes.

I7-3 2. The additional expense through taxes for road repair, sewage replacement/repair and other infrastructure -a local tax that gets larger.

I7-4 3. A tax for increased school buildings and school personnel-another expense that gets larger yearly like police and fire.

I7-5 4. Traffic going East and West on 52, Mission Gorge, Mast and Carlton Oaks depending on the time of day is ridiculous. At 6 am, it takes 21 minutes to drive from Lake Canyon to get on 52 on a weekday. Covid-19 has made it 100% better but that is temporary.

I7-6 5. Noise: Starting at 5:30 a.m from my home, I currently cannot leave a door or window open because I can hear the traffic on Mast, 52 and 125. I wonder how the City of Santee will provide noise abatement if they build Fanita Ranch and associated costs.

I7-7 6. Dust, Dirt and increased air pollution not only a by product of a huge development but decreases in air quality during the building phase in addition to all the noise created by construction trucks and equipment for years.

I7-8 7. Fire Danger: Living in Santee there have been numerous fires but the worst fire ever was the Cedar where everyone who lived by Northern Hills/ Santee Lakes could see the fire coming over the hill just by a stroke of luck we had a wind change. Fire Danger is real in valley and on hill sides.

I7-9 8. The promise by the developer to provide traffic relief for the residents of Santee will never happen. If the City decides to allow this development to be built we will have traffic jams going East and West and also going North and South. How the hell will we be able to evacuate during fire, earthquake or domestic terror.

the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- 17-4:** This comment states that there will be taxes for increased school buildings and school personnel that continues to increase like police and fire. School funding is provided through impact mitigation fees to address facility impacts created by residential and commercial development, which differs from how police and fire are funded. This comment raises economic issues that are not treated as significant effects on the environment and do not need to be evaluated in the EIR per CEQA Guidelines, Section 15131. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- 17-5:** This comment states that traffic going east and west on State Route (SR-) 52, Mission Gorge Road, Mast Boulevard, and Carlton Oaks Boulevard is ridiculous, although COVID-19 has made it temporarily better. The Transportation Impact Analysis (Appendix N) analyzes the transportation effects of the proposed project against baseline traffic conditions before COVID-19. The impacts to SR-52, Mission Gorge Road, Mast Boulevard, and Carlton Oaks Boulevard have been adequately addressed in the EIR in Section 4.16, Transportation. This comment does not raise a significant environmental issue regarding the adequacy

or accuracy of the information provided in the EIR. Therefore, no further response is required.

- 17-6:** This comment states that the noise from Mast Boulevard, SR-52, and SR-125 prevent the commenter from leaving their doors or windows open. This comment relates to the current ambient noise level at the commenter's home and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also asks how the City of Santee (City) will provide noise abatement if the proposed project is built. Section 4.12, Noise, analyzes the potential noise impacts as a result of implementation of the proposed project with respect to changes in vehicular transportation noise, stationary noise, aviation noise, and project construction noise and vibration. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to noise, although not to below a level of significance. This issue is adequately addressed in the EIR.

- 17-7:** This comment states dust, dirt, increased air pollution, and noise are byproducts of a huge development during the construction process. Sections 4.2, Air Quality, and 4.12, Noise, analyze the potential air quality and noise impacts as a result of implementation of the proposed project and identify feasible mitigation to reduce the

impacts, although not to below a level of significance. These issues are adequately addressed in the EIR.

- 17-8:** This comment states there have been numerous fires in the City of Santee and that fire danger is real in the valley and on hillsides. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. This issue is adequately addressed in the EIR.
- 17-9:** This comment states that the traffic relief for residents of the City will never happen, and if the proposed project is built, there will be traffic jams. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system,

including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

This comment also asks how residents will be able to evacuate during fire, earthquake, or domestic terror. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (2020) and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR.

17-10 9. Santee is a small valley. There is no way a developer can add a lane on the freeway or additional surface roads and create traffic relief. Why?  
 52 is bordered by Camp Elliot, Regional park land and dump but even if they could build ten lanes all freeway arteries ingress and egress go into 2 lanes. State of Ca. needs to completely re-do antiquated highways.

17-11 Santee is a desirable place to live but freeway needs to be addressed by the state. What makes Santee nice is I can walk in any direction within 10 minutes and be in a quiet unpopulated area. For the lure of increased tax dollars with massive local tax increases every year to cover the cost of building a huge development is irresponsible government leadership. And aesthetically, did folks move to Santee hoping it would turn into another overpopulated Orange County / LA County-overly urbanized? The Town Center in Santee is great and many folks from San Diego and East County do their shopping in Santee so the city gets plenty of tax revenue. Why not continue to get revenue from more businesses who want to relocate to Town Center instead of allowing greedy, self-serving developers to destroy our Northern Hills and quality of life. Westin is over priced, cookie cutter ugly, with no parking, next to the county dump. A great view when a person is not looking into the sun. Is this what we want for our beautiful Northern Hills? Rosemary Hutzley 619-562-3347

**17-10:** This comment states that the City is a small valley, and there is no way to add a lane to the freeway or surface roads to create traffic relief because SR-52 is bordered by Camp Elliot, regional park land, and a landfill. Please refer to response to comment I7-9, which addresses the same transportation and traffic issue raised in this comment.

**17-11:** This comment states the commenter’s general opposition to development in the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I8: Margie Logue, June 13, 2020

**I8**

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**From:** Margie Logue <wumples51@gmail.com>  
**Sent:** Saturday, June 13, 2020 5:00 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

18-1 This country is in big trouble now because they neglected to deal with problems, just hoping they'd go away. Slavery should have been dealt with in the 1700's, not rearing its ugly head in the 21st century. No one knows what the future may hold, but we do not need to compound our children's problems by building houses that we know will have significant and unavoidable impacts. The problems of air pollution, transportation, noise will not go away. There is no magic wand that will make them OK. Knowingly impacting our children's future in a negative way is not the way Santee runs. Maybe that's changed. Maybe pursuit of the almighty dollar has

18-2 clouded the city's judgement. This plan does not comply with Santee's General Plan and is not in the best interests of the people of Santee.

**I8-1:** This comment provides the commenter’s opinion on a variety of general social and environmental issues, including air pollution, transportation, and noise. Sections 4.2, Air Quality, 4.12, Noise, and 4.16, Transportation, in the EIR analyze the impacts of the proposed project and identify feasible mitigation measures to reduce the potentially significant impacts to air quality, noise, and transportation, although not to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).

**I8-2:** This comment states that the proposed project conflicts with the Santee General Plan. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, analyzes the

proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

## Comment Letter I9: Colleen Cochran, June 16, 2020

**I9**

**I9-1:**

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**From:** Colleen Cochran <colleenmogil@yahoo.com>  
**Sent:** Tuesday, June 16, 2020 11:10 AM  
**To:** Chris Jacobs  
**Subject:** Sycamore Canyon

Colleen Cochran  
 San Diego, California  
 Colleenmogil@yahoo.com

June 16, 2020

Chris Jacobs, Principal Planner  
[cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

I9-1 | **Topic: The Fanita Ranch project does not comply with the Santee General Plan. Voters are due the chance to approve the Santee General Plan Initiative first. I want an opportunity to save Sycamore Canyon.**

Dear Mr. Jacobs:

I9-2 | Sycamore Canyon has vernal pools, and since 98 percent of them have been destroyed, they contain the last survivors of the many species that inhabit them. Sycamore Canyon is Santee's jewel, not just for the inhabitants of vernal pools but for all San Diegans. It is a beautiful place and it makes the city's air smell wonderful.

I9-3 | Destroying Santee's jewel in order to put in the Fanita Ranch 3,000-unit subdivision is a fool's choice. The subdivision will have no benefit other than to ensure developer profits. The sprawling development will destroy the quality of life for

I9-4 | residents in the area because it will increase the likelihood of fires, reduce air quality, and create noise and traffic. And it will eliminate the species that live in the vernal pools forever.

I9-5 | We know people need housing, but we know we won't have people if we destroy the environment. Santee can be a smart visionary. It can devise plans that house people in the existent city area but that retain its beautiful surrounding environment. It can and should retain its jewel, Sycamore Canyon.

I9-6 | The Fanita Ranch project does not comply with the Santee General Plan. Voters are due the chance to approve the Santee General Plan Initiative first. I want an opportunity to save Sycamore Canyon.

Sincerely,

Colleen Cochran

This comment states that the proposed project conflicts with the Santee General Plan. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

This comment also states that the voters are due the chance to approve the Santee General Plan initiative. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also states that the commenter wants the opportunity to save Sycamore Canyon. Section 4.3, Biological Resources, analyzes the potential impacts on biological resources, including sensitive species and habitats in adjacent areas like Sycamore Canyon, from implementation of the proposed project. Mitigation measures are proposed to reduce all direct and indirect impacts to biological resources to less than significant. This issue is adequately addressed in the EIR.

- 19-2:** This comment states that Sycamore Canyon has vernal pools and is beneficial to the City of Santee and San Diegans. Sections 4.3.5.1 through 4.3.5.3 in Section 4.3, Biological Resources, analyze potential impacts to vernal pools. Implementation of Mitigation Measure BIO-12 (Biological Resources Technical Report [Appendix D] Mitigation Measure BIO-3) would reduce impacts to vernal pools to a less than significant level through rehabilitation or enhancement and creation of new seasonal basin resources in the Habitat Preserve. Based on the opinion of the biological experts who

prepared the analysis, the EIR describes the potential direct and indirect impacts, recommends mitigation, and concludes that the impacts are less than significant with mitigation. This issue is adequately addressed in the EIR.

- 19-3:** This comment states that the subdivision will have no benefit other than to ensure developer profits. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- 19-4:** This comment states that the quality of life of residents in the area will be destroyed with increased likelihood of fires, reduced air quality, increased noise and traffic, and destruction of vernal pools. Sections 4.2, Air Quality; 4.3, Biological Resources; 4.12, Noise; 4.16, Transportation; and 4.18, Wildfire, analyze the potential impacts from implementation of the proposed project on the surrounding environment. Mitigation measures are identified to reduce significant impacts to the extent feasible. These issues are adequately addressed in the EIR.
- 19-5:** This comment states that plans should house people in the existing City area to retain the surrounding environment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy

of the information provided in the EIR. Therefore, no further response is required.

- 19-6:** This comment states that the proposed project conflicts with the Santee General Plan, as well as the commenter's view that voters should be able to approve the Santee General Plan initiative and have the opportunity to save Sycamore Canyon. Please refer to response to comment I9-1, which addresses the same issue raised in this comment.

## Comment Letter I10: Carol Logan, June 16, 2020

From: [noreply@cityofsantee.gov](mailto:noreply@cityofsantee.gov) <[noreply@cityofsantee.gov](mailto:noreply@cityofsantee.gov)>  
Sent: Tuesday, June 16, 2020 8:04 AM  
To: Heather Heckman <[HHeckman@CityofsanteeCa.gov](mailto:HHeckman@CityofsanteeCa.gov)>  
Subject: Feedback for Santee, CA

You have received this feedback from Carol Logan <[Carol@thecoreinc.com](mailto:Carol@thecoreinc.com)> for the following page:

<https://www.cityofsanteeca.gov/Home/Components/News/News/2667/9>

I10-1 | This project will be a disaster for Santee We are overcrowded as it is and traffic a nightmare. You don't have to live here  
! We do !

I10

I10-1: This comment states that the proposed project will be a disaster for the City of Santee and that it is already overcrowded and has traffic. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. In addition, Section 4.13, Population and Housing, evaluates the increase in population as a result of the proposed project, including inducement of population growth and displacement of people or housing, and concludes that no significant impacts would occur. These issues are adequately addressed in the EIR.

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## Comment Letter I11: Nancy Burdge, June 23, 2020

**I11**

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**From:** Nancy <njbz@yahoo.com>  
**Sent:** Tuesday, June 23, 2020 11:22 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

June 23, 2020  
 Dear Mr. Jacobs,

I11-1 | Destroying Santee's open space in order to put in the Fanita Ranch 3,000-unit subdivision is a not good. The subdivision will have no benefit other than to ensure developer profits. The sprawling development will destroy  
 I11-2 | the quality of life for residents in the area because it will increase the likelihood of fires, reduce air quality, and create noise and traffic. And it will eliminate the species that live in the vernal pools forever.

I11-3 | We know people need housing, but we know we won't have people if we destroy the environment. And we don't need more oversized housing like in Weston. Santee can be a smart visionary. It can devise plans that house people in the existent city area and retain its beautiful surrounding environment. There is room in the older parts of east Santee to rebuild smaller homes and apartments. It can and should retain its jewel, Sycamore Canyon.

I11-4 | The Fanita Ranch project does not comply with the Santee General Plan. Voters are due the chance to approve the Santee General Plan Protection Initiative first. I want an opportunity to save Sycamore Canyon.

I11-5 | I live in Tierrasanta, but I shop in Santee, visit the parks, and I'm active in the Santee Rocks group.

Thanks for your consideration.

Sincerely,

Nancy J Burdge

1

**I11-1:** This comment states the commenter's opinion that the proposed project will have no benefit other than to ensure developer profits. The proposed project's features, including public amenities, are identified in Chapter 3, Project Description. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I11-2:** This comment states that the quality of life of residents in the area will be destroyed with increased likelihood of fires, reduced air quality, increased noise and traffic, and destruction of vernal pools. Sections 4.2, Air Quality; 4.3, Biological Resources; 4.12, Noise; 4.16, Transportation; and 4.18, Wildfire, analyze the potential impacts from implementation of the proposed project on the surrounding environment. Section 4.3 specifically addresses impacts to vernal pools. Feasible mitigation measures are identified to reduce significant impacts, although not always to below a level of significance. These issues are adequately addressed in the EIR.

**I11-3:** This comment suggests that the City of Santee devise plans to house people in the existing City area to retain the surrounding environment. This comment does not raise a significant environmental issue regarding the adequacy or

accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, as stated in Section 2.2, Project Background, the project site has been planned for development for 40 years.

- I11-4:** This comment states that the proposed project conflicts with the Santee General Plan. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, analyzes the proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be

consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

This comment also states that the voters are due the chance to approve the Santee General Plan initiative first. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also states that the commenter wants the opportunity to save Sycamore Canyon. Section 4.3, Biological Resources, analyzes the potential impacts on biological resources, including sensitive species and habitats in adjacent areas like Sycamore Canyon, from implementation of the proposed project. Mitigation measures were proposed to reduce all direct and indirect impacts to biological resources to less than significant. This issue is adequately addressed in the EIR.

- I11-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I12: Dave Kramer, June 25, 2020

**I12**

**From:** dkramer22@cox.net  
**Sent:** Thursday, June 25, 2020 5:16 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch revised draft EIR Comments

Greetings,

- I12-1 As a longtime Santee resident, I am vehemently opposed to the proposed Fanita Ranch project. Among my many reasons for disapproval of this project, these are points that I would like to be made known to those in City Hall who would be responsible for this project's approval:  
 The project site is located within, and surrounded by terrain that is designated Very High Fire Hazard Zone. Having lived in Santee for several decades, I am well familiar project site and surrounding areas. The terrain is steep, rugged, and isolated. Road emergency egress from the site, via Cuyamaca, Fanita Parkway, and eventually the Magnolia extension, are totally inadequate in the case of a fast moving, Santa Anna wind driving type of fire. Furthermore, these streets dump into existing neighborhoods, where those residents would be simultaneously fleeing in the event of a quickly advancing like the Cedar fire of 2003. This would result in traffic congestion that would entrap and endanger not only the new residents, but residents in existing neighborhoods as well. The draft revised EIR does not adequately address this, but merely presents mitigations in a "best case scenario". Anyone who lived through the Cedar Fire will understand its flaws.
- I12-2
- I12-3 The slot canyons which adjoin the project site, to the north and east, and would be directly upwind of the development site in a Santa Anna wind driven fire. These slot canyons deep, rugged, isolated, and would act as an intense fuel primer in a wind driven fire, as was the case during the Cedar fire. These lands are owned by different entities, separate from the development and beyond the reach of mitigations cited in the draft revised EIR. Should these slot canyons become involved in a fast advancing Santa Anna wind driven fire, it would be practically impossible for residents of nearly 3000 FR households to evacuate in time via only two streets to the south, onto a road and freeway infrastructure that is grossly inadequate to handle that much vehicle traffic simultaneously. This would be a disaster waiting to happen.
- I12-4 The existing street, road, and freeway are already saturated to capacity, and are grossly inadequate to handle the thousands of additional daily vehicle trips resulting from this development. The traffic mitigations cited are superficial at best, and not nearly enough to accommodate the additional vehicles. Not even close.
- I12-5 The resulting increase in vehicle traffic puts the region further out of compliance with CEQA, will adversely impact public safety and quality of life.
- I12-6 I am but a single tax paying resident voter, of modest means. But I can say with a high level of confidence that no Santee resident who I know of, especially those in my local neighborhood in the NE section of town are in favor of this development. Most are either equally, or more strongly opposed than myself and will plan to express this opposition at the ballot box. This project, and it's previous incarnations have long been surrounded by controversy, in a large part for some of the reasons I've listed. Approval of the FR project will only serve to further the widely held perception that, to this Mayor and City Council, the influence of developer dollars takes precedence over public safety and quality of life of the residents they are sworn to represent.

Very Respectfully,  
 Dave Kramer  
 Santee resident, NE section of town  
[dkramer22@cox.net](mailto:dkramer22@cox.net)

**I12-1:** This comment provides an introduction to the comment letter stating the commenter is opposed to the project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I12-2:** This comment suggests that the EIR does not adequately address the emergency egress, and claims evacuation routes would be inadequate in the case of a fast-moving Santa Ana wind-driven fire and worse when considering the additional evacuation from existing development. The proposed project's location in an area designated as a VHFHSZ does not indicate that the proposed project cannot be constructed safely. Rather, it requires the proposed project to apply the ignition-resistant materials and methods detailed in Chapter 7A of the California Building Code. The Fire Protection Plan (Appendix P1) analyzes the site's fire environment, including fuels and terrain and models fire behavior using standard protocols and models. The anticipated fire that could be generated from the site's fire environment has been designed and planned for through the required fire protection features. Please refer to Thematic Response – Fire Protection and Safety for more information regarding the fire protection features that would be implemented. Regarding evacuation and the proposed

project's road system, the proposed project meets the City's code requirements for access points, road widths, turning radii, and all other road requirements. Each neighborhood has a minimum of two access and egress points. Please refer to Thematic Response – Evacuation for details on how the City of Santee and the County of San Diego plan and implement evacuation events. This comment raises no new issues that have not been adequately addressed in the EIR. Therefore, no additional response is required.

- I12-3:** This comment describes the slot canyons to the north and east of the project site, then asserts evacuation of the proposed project would be impossible during a fast-moving Santa Ana wind-driven fire. The fire environment has been evaluated, including the canyons referred to in the comment. Fires igniting near any community represents the greatest challenge for evacuation, but this possibility has been anticipated with the proposed project design and fire protection hardening as detailed in Thematic Response – Fire Protection and Safety and the proposed project's Fire Protection Plan (Appendix P1). Protecting populated areas focuses on hardening the structures and landscape from fire, as well as providing reduced fuel buffers along the perimeter areas. Attempting to reduce fire hazard by manipulating vegetation far away from the community is typically not feasible due to biological sensitivity and

related cost but is also not considered the best practice as wildfires are prone to be blown over firebreaks via airborne embers. Regarding proximity fire evacuation events, the proposed project provides emergency managers the contingency option of temporary refuge within the site's protected structures in a short-notice evacuation event when they determine it is safer than a late evacuation. Please refer to Thematic Response – Evacuation for more details on evacuation planning and implementation in the City of Santee and the County of San Diego. The comment raises no new issues that have not been adequately addressed in the EIR. No additional response is required.

**I12-4:** This comment states the existing streets, roads, and freeways are at capacity and that the traffic mitigation measures would not accommodate the additional vehicles. Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the

impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

- I12-5:** This comment states that the resulting increase in vehicle traffic puts the region further out of compliance with CEQA and will adversely impact public safety and quality of life. As discussed in response to comment I12-4, the EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091), and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).
- I12-6:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I13: Marianne and Roger Lamoureux, June 29, 2020

**I13**

**I13-1:** This comment states that the proposed project conflicts with the Santee General Plan. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, analyzes the proposed project’s potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project’s consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project’s consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

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**From:** Marianne Lamoureux <mlamoureux@bycor.com>  
**Sent:** Monday, June 29, 2020 2:36 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

To: Chris Jacobs, Principal Planner

I13-1 | The project does not comply with the Santee General Plan! 2,959-3008 units clearly and massively exceeds the General Plan!!

I13-2 | My husband and I both oppose this project and will vote YES on the Santee General Plan Protection. We're sick of these developers coming in from LA who now know what's best for Santee. We voted this down before. We don't want this development.

I13-3 | We have enough traffic in Santee. Before this pandemic it sometimes took me 20 mins to travel from my home on the north end of Carlton Hills Blvd. to the 52 West entrance. 20 mins!!! During this pandemic, with millions of our work, it takes 15 mins to travel from my home to my place of work in the Miramar area. This ridiculous development will extend the time it takes for my 2 mile ride

*Regards,  
 Marianne & Roger Lamoureux  
 33 year Santee residents*

- I13-2:** This comment states that the commenter opposes the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I13-3:** This comment states that the City of Santee has enough traffic and describes the commenter's commute pre- and post-COVID-19 pandemic. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. In addition, the Transportation Impact Analysis (Appendix N) analyzes the transportation effects of the proposed project against baseline traffic conditions before the COVID-19 pandemic. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

## Comment Letter I14: Arli Wolfson, July 2, 2020

I14

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**From:** arligraphc@aol.com  
**Sent:** Thursday, July 2, 2020 6:38 PM  
**To:** Chris Jacobs  
**Subject:** Traffic on Mast...

I14-1 I live a block off of Mast Boulevard on Medina Drive. During normal rush hours, how could it possibly take me more than 20 minutes to go exactly one mile to the entrance ramp of 52? Nothing I've seen on all of the traffic mitigations from the development of Fanita seems adequate to address these problems. I can no longer make early doctor appointments or early flight reservations because in normal times it is impossible to get out of Santee.

I14-2 How could the addition of 3000 homes, and 6000+ cars on the already clogged roads of Santee, help the traffic problems in Santee?  
 Arli Wolfson

**I14-1:** This comment describes the commenter’s commute time and states the commenter’s opinion that the proposed traffic mitigation does not seem adequate to address the traffic from the proposed project. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**I14-2:** This comment questions how the additional homes proposed by the proposed project help the traffic problems in the City of Santee. Please refer to response to comment I14-1, which addresses the same issue raised in this comment.

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## Comment Letter I15: Ronald and Gloria Gerak, July 3, 2020

I15

**From:** Gloria Gerak <gvgerak@cox.net>  
**Sent:** Friday, July 3, 2020 1:31 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Draft EIR

Chris Jacobs, Principal Planner:

I15-1 Even with 30 prescribed mitigation measures, "impacts to [6] intersections, [5] street segments, and [2] freeway mainline segments would remain significant and unavoidable." [RDEIR 4.16-100]  
 Santee's heavily impacted circulation network will be significantly more vulnerable during wildfire emergency evacuation.

I15-2 In 2004 we were literally trapped with only one way out for the City. Please reconsider this project. It wasn't good for Santee 20 years ago and it isn't good for Santee now. At least 20 years ago the  
 I15-3 density was only at 1200. Please stick to the General Plan. We are against this project.

Respectfully,

Ronald & Gloria Gerak  
 9605 St. Andrews Drive  
 Santee, CA 92071

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**I15-1:** This comment summarizes information disclosed in Section 4.16, Transportation, of the EIR. It also states that the City of Santee's circulation network will be more vulnerable during wildfire emergency evacuation. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR. Please also refer to Thematic Responses – Fire Protection and Safety and Evacuation.

**I15-2:** This comment states that the commenter was trapped in 2004 with only one way out and asks for the proposed project to be reconsidered. This comment does not raise a significant environmental issue regarding the adequacy

or accuracy of the information provided in the EIR. Therefore, no further response is required.

- I15-3:** This comment requests that the Santee General Plan is adhered to and states that the commenter is against the proposed project. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, analyzes the proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

## Comment Letter I16: Jeff Kahn, July 3, 2020

**I16**

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**From:** jeffkahn.org <kahndesign@gmail.com>  
**Sent:** Friday, July 3, 2020 9:53 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

Dear Mr. Jacobs,

I16-1 I am a fellow Santee citizen. I struggle with fire hazards every year. I don't want to make it worse. The Fanita Ranch development is a hazardous mistake! Santee's heavily impacted circulation network will be significantly more vulnerable during wildfire emergency evacuation.

Regards,  
Jeff Kahn

**Jeff Kahn**  
Artist, Designer, Educator, Earthling  
760.944.5574  
[jeffkahn.org](http://jeffkahn.org) | [LinkedIn](#)

**I16-1:** This comment states that the commenter struggles with fire hazards every year, the proposed project is a hazardous mistake, and the City of Santee's circulation network will be more vulnerable during wildfire emergency evacuation. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR.

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## Comment Letter I17: Ed Ferrari, July 4, 2020

I17

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**From:** Ed Ferrari <ed@edferrari.com>  
**Sent:** Saturday, July 4, 2020 9:04 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch revised draft EIR

Dear Mr. Jacobs,

I17-1 | I'm writing this email in support of the Fanita Ranch development. As you are aware, the San Diego area is in desperate need of additional housing. Fanita Ranch provides an opportunity to make a dent in this need. In addition, Fanita Ranch will provide much needed job opportunities to Santee residents that have been adversely affect by the economic downturn due to the Covid-19 pandemic. The proposed improvements to city streets and SR 52 will undoubtedly help alleviate the traffic congestion residents have experienced in the morning and evening rush hour. Lastly, Fanita Ranch provides a unique mix of housing for all levels of home ownership -- from first homes for new families all the way to seniors looking to downsize.

Please provide the go-ahead to this much needed project!

Thank you,  
Ed Ferrari

**I17-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I18: Matt Cantor, July 5, 2020

I18

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**From:** rotnacm@live.com  
**Sent:** Sunday, July 5, 2020 7:01 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

Mr. Jacobs-

I18-1 I have lived in Santee since 1991 when I bought a townhouse across Magnolia Avenue from City Hall. I have since moved into a home off Cuyamaca St. I have watched Santee get more and more crowded and I have to say enough is enough. To allow HomeFed to build 3000 homes on a parcel zoned for half that many, in conjunction with all of the other construction projects approved by the city is less than irresponsible. It is criminal. The

I18-2 people who live in Santee voted down the issue years ago when another builder tried the same thing. Do you not remember? Yet, here we are again.

I18-3 The developer is flat out lying when they say that the traffic mitigation plan they propose will reduce traffic. One of their managers admitted this to me quite frankly in casual conversation at one of their info meetings. He also remarked that Home Fed will do what they have to do to get this built, even if it means stretching the truth.

I18-4 I voted no years ago and will vote no again. I will also vote to remove any council member who disregards the will of the city residents when it comes to these quality of life decisions.

Thank you.

Matt Cantor

**I18-1:** This comment provides an introduction to the comment letter and opines that it is irresponsible to build 3,000 homes in conjunction with other construction projects approved by the City of Santee. Section 4.13, Population and Housing, in the EIR analyzes the growth in population directly and indirectly related to implementation of the proposed project and the potential population and housing impacts that could result. Changes in population, employment, and housing demand are social and economic effects, not environmental effects. According to CEQA, these effects should be considered in an EIR only to the extent that they create adverse impacts on the physical environment. The EIR concludes that the proposed project would result in less than significant impacts to population and housing. This issue is adequately addressed in the EIR.

**I18-2:** This comment states that Santee citizens voted down the development years ago when another builder planned to build the previous project. The consideration of prior voter initiatives is not relevant to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- I18-3:** This comment seeks to discredit the applicant's statements regarding the ability for the proposed traffic mitigation measures to reduce traffic impacts. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.
- I18-4:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I19: Peter Burrell, July 7, 2020

**I19**

**From:** Heather Heckman  
**Sent:** Tuesday, July 7, 2020 1:57 PM  
**To:** Chris Jacobs  
**Subject:** FW: Feedback for Santee, CA

**From:** noreply@cityofsantee.gov  
**Sent:** Tuesday, July 7, 2020 1:54 PM  
**To:** Heather Heckman  
**Subject:** Feedback for Santee, CA

You have received this feedback from Peter Burrell < [burrells202@gmail.com](mailto:burrells202@gmail.com) > for the following page:

[https://www.cityofsanteeca.gov/our-city/public-notice/draft-revised-environmental-impact-report?fbclid=IwAR30W-sg658VerRXx2E3Cgss7uZPiXqF4TLbAsD4scZkUlpCDvnmIn\\_4ZBo](https://www.cityofsanteeca.gov/our-city/public-notice/draft-revised-environmental-impact-report?fbclid=IwAR30W-sg658VerRXx2E3Cgss7uZPiXqF4TLbAsD4scZkUlpCDvnmIn_4ZBo)

I19-1 Regarding the EIR, I have a concern regarding fire safety and the ability to evacuate Santee residents and the additional residents who would be evacuating from Fanita Ranch. It is my understanding that the only in and out route will be through Santee. Anyone who commutes knows the folly of traveling on Mast Blvd during rush hours. If 2000 homes are built which means easily 4000 more cars plus, there could be significant repercussions if this isn't addressed. One only needs to drive near Temecula to see back ups on the I-15 caused by bumper to bumper traffic on Temeculas main streets. Not only does it effect the cities quality of life but it becomes a life threatening danger in the wake of out of control wildfires. I don't think our streets could handle the extra traffic during a crisis. Peter Burrell

**I19-1:** This comment states concern regarding fire safety and the ability to evacuate City of Santee residents and the additional proposed project residents. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR. Please also refer to Thematic Response – Evacuation.

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## Comment Letter I20: Danielle and Mike Gregus, July 7, 2020

**I20**

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**From:** Michael Gregus <mgregus@gmail.com>  
**Sent:** Tuesday, July 7, 2020 9:48 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch EIR

Dear Mr. Jacobs,

Our family is very excited about the Fanita Ranch project in Santee. We'd like to voice our pleasure with the updated EIR findings, as they ultimately show that Fanita Ranch can be built safely, be environmentally friendly, and really be a huge benefit for all of Santee.

I want to make sure that I can raise my boys in a community that is safe, sustainable, and family oriented. In reviewing the Environmental Impact Report, it is clear to me that the Fanita Ranch project encapsulates everything that I value in a community. If the Fanita Ranch development project comes to fruition, we hope to live there.

I20-1

The Fanita Ranch project is clearly a family-oriented development. And there will be an organic farm with a farm market where Fanita Ranch families can buy organic farm produce. The farm will have interactive education events for children and the opportunity for senior citizens to volunteer. For me, it is important for my children to be involved in their community, and this is the perfect way to stimulate involvement.

Additionally, it is important that the project is environmentally friendly so that the land supporting Fanita Ranch is taken care of. The EIR has confirmed that the project is sustainable and sound for the surrounding environment. The project will have little to no impact on the aesthetics, air quality, biological resources, cultural resources, public services, wildfire and other areas that were studied. This gives me confidence that this is safe for both the environment and families living in the development.

Best,

Danielle and Mike Gregus  
10109 Ashdale Ln

**I20-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I21: Rudy Reyes, July 7, 2020

I21

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**From:** Rudy Reyes <rreyes2777@gmail.com>  
**Sent:** Tuesday, July 7, 2020 11:54 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

I21-1 I am still reviewing the EIR (will send in comments when I am ready) but one thing that caught my attention now is the report's threshold for "Less than Significant". It's based on level of service (LOS) which is the grading system that's phased away. Under LOS grading system, the impact on an intersection that is currently LOS A and will become LOS D by Fanita Ranch project is "Less than Significant" and doesn't require mitigation (because the threshold for significance is LOS E). However, Senate Bill 743 that was passed in 2013 and is now in effect statewide as of July 1, 2020 replaces LOS with VMT. Traditional transportation impact findings based on LOS are likely to be reversed when the switch to VMT occurs. All impacts this EIR claims "Less than Significant" shall be back-checked based on VMT and the most stringent VMT criteria should be followed if city, county, and state criteria differ.

Please explain?

Rudy Reyes

**I21-1:** This comment states that the EIR analysis uses the level of service (LOS) grading system that has been phased out. The Transportation Impact Analysis (Appendix N) evaluating the proposed project contains both an LOS and a vehicle miles traveled (VMT) analysis, and the significance of impacts were determined using both metrics. Since the EIR began public review before July 1, 2020, a VMT analysis was not technically necessary to perform. This issue is adequately addressed in the EIR.

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## Comment Letter I22: Rudy Reyes, July 7, 2020

I22

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**From:** Rudy Reyes <rreyes2777@gmail.com>  
**Sent:** Tuesday, July 7, 2020 2:02 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

I22-1 | This is the bill which made the changes from Los to vtr....SB 743...took affect as of the first of this month....why isn't it the current standard overseeing fanita ranch?  
<https://opr.ca.gov/ceqa/updates/sb-743/>

**I22-1:** This comment provides a link to a summary of Senate Bill 743 that the commenter states changes from level of service (LOS) to vehicle miles traveled (VMT), and asks why this is not the current standard overseeing the proposed project. The Transportation Impact Analysis (Appendix N) contains both an LOS and a VMT analysis, and the significance of impacts were determined using both metrics. See Comment Letter I21 (Rudy Reyes, July 7, 2020), which addresses the same issue.

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## Comment Letter I23: Gloria Valenti Gerak, July 8, 2020

**I23**

**From:** Gloria Gerak <gvgerak@cox.net>  
**Sent:** Wednesday, July 8, 2020 6:00 PM  
**To:** Chris Jacobs  
**Subject:** Re: Fanita Draft EIR

I23-1 I have questions regarding:

I23-2 Page 2 #8: How will this be a fire-safe community when the Court has already ruled that this area is a problem for development?

I23-3 Page 7 #3.3: How can this many units be built without a General Plan Amendment? The original Fanita Ranch proposal years ago was for 1,200 homes and this is more than doubled?

I23-4 Page 32 Traffic Calming Plan - This descriptions confirms that it is NECESSARY for the Residents of Santee to have Lower Vehicle Speeds and Less Traffic Noise for "QUALITY OF LIFE". How will the projects' excessive pollution, noise from speeding cars and congestion, be mitigated for the Citizens of Santee that do not live in the project, but are impacted by the additional traffic, pollution, and traffic noise the new project will bring?

I23-5 Table 4.12-1 is a table from 2013 - isn't there anything more current than that chart.

I23-6 Noise: The general plan calls for a noise level from traffic of no more than 65DB, the EIR states that Mast Blvd and other streets are already in excess of 70DB, how will you mitigate the extra noise from the extra traffic?

Thanks,

Gloria Valenti Gerak  
 Media Planning & Placement  
 9605 St. Andrews Drive  
 Santee, CA 92071  
 619.562.6622 Office & Fax  
 Mobile 619.300.6623



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**I23-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I23-2:** This comment questions how the proposed project will be a fire safe development given previous Court rulings. Please refer to Thematic Responses – Fire Protection and Safety, Evacuation, and Fire Ignition and Risk for details regarding the fire protection system and its ongoing maintenance and evacuation planning and implementation in the City of Santee and the County of San Diego. The proposed project includes a new Fire Protection Plan (Appendix P1). The new Fire Protection Plan (Appendix P1) addresses the issues identified in Court decisions specific to the previously proposed project. Please refer to Section 9 of the Fire Protection Plan and Section 4.18.7, Comparison of Proposed Project to 2007 Project, in Section 4.18, Wildfire, of the EIR for a detailed comparison of the changes between the 2007 and 2020 fire protection approaches.

**I23-3:** This comment asks how the project can be built without a General Plan Amendment. The project would require approval of a General Plan Amendment to allow 2,949 units on the project site (or 3,008 without a school), as

identified in Section 3.12, Discretionary Actions, in Chapter 3, Project Description.

- I23-4:** This comment inquires how the proposed project's pollution, noise, and traffic would be mitigated. The EIR analyzed the impacts of the proposed project on air quality (Section 4.2), noise (Section 4.12), and transportation (Section 4.16) and identified feasible mitigation measures to reduce the impacts, although not all impacts would be reduced to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091), and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).
- I23-5:** This comment references Table 4.12-1, Typical A-Weighted Noise Levels, in Section 4.12, Noise, and questions whether a more current chart is available. This table provides an overview of typical noise levels as outlined in the Technical Noise Supplement to the Traffic Noise Analysis Protocol prepared by the California Department of Transportation (Caltrans). Table 4.12-1 is consistent with the most recent update to the Technical Noise Supplement,

which was published in 2013. Therefore, the EIR presents the most current data available. No changes to the table have been made in response to this comment.

- I23-6:** This comment references a General Plan standard of 65 dBA for traffic noise, and questions how increases in noise levels on Mast Blvd and other streets that currently exceed 70 dBA will be mitigated. Section 8.1 of the City's General Plan Noise Element, Local Regulations, establishes noise levels up to 65 dBA CNEL as normally compatible with noise-sensitive development. The Noise Element also establishes a CEQA threshold that a significant impact would occur if the project would cause noise levels to exceed the City's noise compatibility guidelines. Where noise levels exceed the compatible noise level without project implementation, an increase in noise level of 3 dBA or more, directly attributable the project, would be significant. The proposed project is not required to mitigate the ambient (existing) noise.

Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, evaluates the potential for the proposed project to result in a significant increase in traffic noise levels using the CEQA threshold outlined in the Noise Element. The potential for the proposed project to permanently increase traffic noise is addressed under the following traffic impact analysis scenarios: Existing + Project Buildout, Near-Term + Project Buildout, and Year 2035 + Project Buildout. Noise levels with and without proposed project implementation are

provided in Table 4.12-11, Existing + Project Traffic Noise Levels; Table 4.12-12, Near-Term Traffic Noise Levels; and Table 4.12-13, Year 2035 Traffic Noise Levels. As shown in these tables, noise levels on segments of Mast Boulevard, Mission Gorge Road, Fanita Parkway, Carlton Hills Boulevard, Cuyamaca Street, and SR-52 are calculated to be 70 dBA CNEL or above under existing or future conditions. Therefore, the proposed project would not directly result in a significant contribution (3 dBA or higher) to noise levels on Mast Boulevard, Mission Gorge Road, Carlton Hills Boulevard, or SR-52. No noise mitigation measures are required for these roadways.

Regarding noise impacts on Fanita Parkway and Cuyamaca Street, the EIR identifies Mitigation Measure NOI-6, Noise Barrier Installation, to mitigate noise impacts to these roadways. Mitigation Measure NOI-6 would reduce impacts to some, but not all, receptors to a less than significant level. Section 4.12.5.1, under the Operational Noise Mitigation Measures Heading, includes an evaluation of other mitigation measures that were considered but rejected for the proposed project, including additional noise barriers and installation of asphalt rubber. Feasible mitigation is not available to reduce all significant traffic noise increases to below the City's CEQA thresholds; therefore, Section 4.12.5.1 identifies a significant and unavoidable traffic noise impact on Fanita Parkway and Cuyamaca Street. This issue is adequately addressed in the EIR.



## Comment Letter I24: Joni Hendrickson, July 8, 2020

**I24**

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**From:** Joni Hendrickson <bonjonii@aol.com>  
**Sent:** Wednesday, July 8, 2020 11:44 PM  
**To:** Chris Jacobs  
**Subject:** Stop Fanita Ranch

- I24-1 As a registered voter and property owner in Santee, CA I am writing to request that Fanita Ranch as well as all further housing developments in Santee be stopped.
- I24-2 The quality of life for Santee residents continues to decline as crowding increases with housing developments. Our surface streets are congested with traffic. It is difficult to exit one's driveway to get out on to the street, let alone get on the freeway or drive to the grocery store. Adding a lane to HWY 52 will not solve the problems as the developers of Fanita Ranch claim. We are over crowded and crowded people have short tempers. Driving on our streets is unsafe and unpleasant due to the excess of cars running red lights and leaving no room for merging to a lane needed in order to make a turn.
- I24-3 We are losing the beauty of our hillsides by the expansion of development.
- I24-4 Please don't ruin Santee any further then it already has been. Listen to the people who live here. Stop Fanita Ranch once and for all.

Thank you for your time.  
 Joni Hendrickson  
2020

**I24-1:** This comment provides an introduction to the comment letter and asks that the proposed project and all other housing developments in the City of Santee (City) be stopped. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I24-2:** This comment states that traffic conditions will continue to decline in the City with increased development and that adding a lane to State Route 52 will not improve traffic conditions. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant

Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093). This issue is adequately addressed in the EIR.

- I24-3:** This comment states that the beauty of the hillsides will be lost with the expansion of development. Section 4.1, Aesthetics, analyzes the potential visual impacts of the proposed project from 16 key viewpoints. Specifically, Section 4.1.5.3, Threshold 3: Visual Character, discusses the proposed project's impacts on visual quality and character and landform alteration. To protect and manage hillsides and topographic resources, the City has adopted hillside development guidelines as described in Table 4.1-1, City of Santee Hillside Development Guidelines. By complying with the policies in the Santee General Plan and the requirements of the Santee Municipal Code, as well as adhering to the guidelines set forth in the Fanita Ranch Specific Plan, the EIR concludes that the proposed project would not degrade the existing landscape from a public viewpoint. This issue is adequately addressed in the EIR.

- I24-4:** This is a closing comment expressing the commenter's opposition to the proposed project. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I25: Michele Perchez, July 8, 2020

**I25**

**From:** michele perchez <mperchez5@gmail.com>  
**Sent:** Wednesday, July 8, 2020 3:30 PM  
**To:** Chris Jacobs  
**Subject:** RE: comment letter for Fanita Ranch DEIR

July 8, 2020

RE: Fanita Ranch Draft EIR—Noise Element

125-1 The Draft Environmental Impact Report submitted in the application of the proposed Fanita Ranch development project by Home Fed developers states numerous places that the *permanent increase* in ambient noise levels during operation remain *significant* and *unavoidable, even after mitigation*. Most of this is due to traffic noise from trips by residents, and are *especially profound on Fanita Parkway, north of Mast Boulevard*.

125-2 Assuming all calculations are correct, and estimates of attenuation of noise generated from multiple sources (construction equipment, blasting activity and the like) are correct, there are still many questions, as well as clearly stated conclusions that not all noise will be mitigated, and that this a permanent state of affairs for current and future residents of Santee. Thus, the very *quality of life* that all Santeecans value so deeply, is negatively impacted *FOREVER*.

125-3 Please address the following specific questions thoroughly:

125-4 1-How can the city justify allowing construction noise (in particular, nighttime noise that is likely to occur) to violate City Ordinances? I am sure a special permit is needed, but what say you to your citizens that makes this allowance ok? Will citizens be able to voice their concerns ahead of this taking place?

125-5 2-A weakness of the plan is that estimates of onsite noise cannot be *fully* conducted at this time because it is unclear what will actually be built (besides residences) on the site. Citizens have no say a priori to what could surely impact their quality of life.

125-6 3-In relation to the Farm project, the document says that barriers *can* be built around stationary equipment that generate noise—how does that process work? How many residents must complain before you fix it, and who fixes it and who pays for it?

125-7 4-Special events taking place on site can accommodate up to 300 people and could generate noise as high as 101dBA 10ft from the source and/or a higher than conversation-level noise 315ft from the source. Though you claim that the noise would be temporary and intermittent, how will this be monitored and rectified? What plan is in place to address this when it is more commonplace than predicted, being a more regular occurrence of longer durations than predicted?

125-8 5-The document says that in the Special Use area, an automated gate is likely to be installed that may generate nighttime noise, again, who pays for the use of an offsite RV storage location that may be needed to avoid disruption to neighbors?

125-9 6-How will you mitigate noise for the school if it is built? What is the plan?

1

**I25-1:** This comment summarizes information provided in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, related to permanent increases in traffic noise levels, specifically on Fanita Parkway. The comment accurately states that a significant and unavoidable impact is identified on Fanita Parkway north of Mast Boulevard. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I25-2:** This comment summarizes the commenter’s noise concerns that are outlined in subsequent comments. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I25-3:** This comment provides an introductory statement pertaining to subsequent comments. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I25-4:** This comment raises concerns about nighttime construction noise in violation of the City of Santee’s (City’s) Noise Ordinance. As identified in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, in

the EIR, construction activities are anticipated to occur during the City's allowable hours of operation; however, some nighttime construction in roadways may be required to avoid traffic impacts. Section 4.12.5.1 evaluates construction noise impacts as result of the proposed project. Nighttime construction, if necessary, would require approval by the Director of Development Services approval consistent with Section 5.04.090 of the City's Noise Ordinance. This requirement, as well as a commitment to sound reduction measures, is included in Mitigation Measure NOI-4, Nighttime Noise Sound Management Plan. Additionally, Mitigation Measure NOI-3, Roadway Construction Notification, requires written notification to any existing uses within 300 feet of roadway construction activities be provided no later than 10 days before the start of construction activities. The notification would provide a point of contact to resolve noise complaints. The notification process would allow residents to voice concerns to the City prior to the start of construction and during construction activities.

- I25-5:** This comment states that estimates of on-site noise from non-residential uses cannot be fully conducted because it is unclear what will be built. The EIR does address noise from non-residential land uses in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards. The EIR provides an evaluation of typical noise produced from commercial development including heating, ventilation,

and air conditioning equipment; commercial truck deliveries at loading docks; parking lots; and evening or nighttime noise from dining or entertainment. Agricultural, recreational, and school noise sources are also evaluated. The EIR presents a conservative analysis by evaluating impacts to existing residences at the closest possible distance between non-residential development and receptor. Due to over 2,000 feet of distance between existing receptors and village development, no significant noise impacts were identified. The comment does not identify a specific noise source of concern. The EIR addresses typical noise sources that can reasonably be assumed to be part of the proposed project. It would be speculative to address other specific noise sources that have not been identified. This issue is adequately addressed in the EIR. Consistent with CEQA, potential impacts of the proposed project were disclosed and available for citizen review and input during the 45-day Draft EIR public comment period. Additionally, future development would be subject to the City's Noise Ordinance that is intended to protect residents from noise that is unnecessary, excessive, or annoying.

- I25-6:** This comment requests details regarding the installation of barriers around stationary equipment at the proposed Farm. Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, evaluates the potential noise impacts of the Farm operation. As stated in this section, the design

plan for the Farm includes a condition of operation that noise barriers shall be installed around any stationary noise-generating equipment where a barrier is required to reduce noise levels to below a 1-hour average sound level of 50 decibels as measured at the nearest adjacent on-site residential property line. The Farm operator would be responsible for the implementation of any required noise barriers.

- I25-7:** This comment asks how noise at the Farm will be monitored and rectified and what would happen if events were to occur more frequently or for longer durations than described in the EIR. Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, evaluates the potential noise impacts of special events at the Farm. The evaluation of special event impacts does not include a specific prediction of event frequency or duration. Rather, the evaluation of potential impacts is based on the estimated worst-case noise level that would potentially occur from a special event based on maximum event capacity of 300 persons. The nearest existing noise sensitive land uses are approximately 3,090 feet south of the event area; due to distance, a potentially significant impact would not occur. This conclusion is not dependent on event frequency or duration. This issue is adequately addressed in the EIR. Additionally, future events at the Farm would be subject



to the City's Noise Ordinance, homeowners association guidelines, and approval/oversight by the Farm operator.

- I25-8:** This comment refers to an automated gate installed in the Special Use area that may result in nighttime noise and asks who would be responsible for paying for the use of an off-site RV storage location to avoid disruption to the neighbors. Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, evaluates the potential for noise impacts as a result of gate operation at the Special Use area. The EIR determines that a potentially significant impact would occur as a result of gate operation because gate specifications are currently unknown and existing receptors are within 50 feet of the boundary of the Special Use area. Therefore, the EIR requires implementation of Mitigation Measure NOI-5, Special Use Area Noise Measures. This mitigation measure outlines performance standards for the automated gate, including a noise level limit consistent with the City's Noise Ordinance, and a process for addressing complaints. The mitigation measure requires response within 1 business day to complaints received by the site operator from residents or received from the City as a result of a complaint regarding nuisance noise. The response shall detail measures that the site operator will take to address the complaint and a timeline, such as a scheduled maintenance appointment. This issue is adequately addressed in the EIR.

**I25-9:** This comment asks how potential noise impacts to the school will be mitigated. As outlined in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, CEQA is intended to protect the existing environment from impacts that would result from the proposed project. Generally, CEQA does not consider impacts of the existing environment on a proposed land use to be significant (see Section 15126.2 of the CEQA Guidelines). Likewise, sensitive receptors proposed as part of the proposed project are not part of the existing environment, and impacts to these receptors, including the school, from implementation of other project components are not addressed. The exception is the analysis of consistency with the Santee General Plan. The Santee General Plan Noise Element specifically states that a significant impact would occur if noise levels at any planned development site would exceed the noise levels considered compatible for that use. Therefore, the potential for ambient noise levels to impact the proposed project is addressed under the On-Site Exposure to Ambient Noise Levels heading in Section 4.12.5.1 in the context of demonstrating consistency with the Santee General Plan. No significant impact was identified to the potential school site as a result of this analysis, and no mitigation is required. This issue is adequately addressed in the EIR.

125-10 7-NOI-1 To clarify, limiting truck trips during Phase 1, is that due to the fact that there will be the most trips initially to get all building materials to the site, and then a drop off in need for truck trips after that? How many truck trips are anticipated after Phase 1, and on which roadways?

125-11 8-NOI-2 It is not clear to me as to the rationale for waiting to install noise barriers along Magnolia (until after 1,500 effective residences have been built). Please clarify why the sound is considered mitigated by existing barriers at Cuyamaca for the estimated multiple years before barriers along Magnolia get installed.

125-12 9-NOI-3 If new roadway construction noise generates complaints from residents, how can they access the subsequent acoustical monitoring data to cross-check compliance?

125-13 10-NOI-4 For any nighttime noise issues, who ensures compliance? Are you just waiting for residents to complain, or are there sensors on site to detect issues before residents come forward?

125-14 11-NOI-9 How are residents within 75ft of vibration occurrence notified 3 weeks prior to occurrence? Website? Mailer? Call? Email? Newspaper? Social media?

125-15 Noise can often be considered as just a nuisance, something to simply be ignored. But, I am surprised to see how profound the effects of exposure to noise can be. I will not inundate you with lots of articles, just one general overview.

<https://www.science.org.au/curious/earth-environment/health-effects-environmental-noise-pollution>

125-16 As a result of researching the impacts of noise, I have a genuine concern for the impacts of the proposed project in relation to the noise creation and perpetuation I read about in the DEIR. I hope each person that has power to make decisions and influence outcomes in relation to ANY project at the location will take into consideration deeply, the permanent results the project will have on the residents of Santee. Think of your family, your neighbors, when you decide what choices should or should not be made—remember, the impacts are “cumulative, considerable and unavoidable”.

Sincerely,

Michele Perchez

Santee Resident for 19.75yrs

**I25-10:** This comment requests clarification regarding construction truck trips. Noise from construction truck trips is addressed in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, under the Construction Traffic Noise Heading for the Existing + Construction and Near Term + Interim Operation + Construction scenarios. As described in this section, construction traffic volumes are provided by the Air Quality Analysis prepared by LSA (Appendix C1). Truck trips were calculated by the CalEEMod model based on the amount of building construction required in each phase. The highest number of truck trips, 312 vendor trips, is estimated daily for Phase 1. During Phase 1 of construction, all construction trips would access the project site via Fanita Parkway because the extensions to Cuyamaca Street and Magnolia Avenue would not be completed prior to this phase. Following Phase 1, the highest number of truck trips, 235 daily vendor trips, would occur daily during building construction activities in Phase 4. This worst-case scenario represents construction traffic from Phases 2 through 4. The analysis of Near-Term conditions assumes that the Cuyamaca Street and Magnolia Avenue extensions would be accessible following Phase 1 and that construction trips may use any study area roadway. Following Phase 1, the analysis conservatively assumes 100 percent of

construction traffic on each segment of Fanita Parkway, Cuyamaca Street, and Magnolia Avenue.

- I25-11:** This comment requests clarification for the timing of installation of the noise barrier on Magnolia Avenue in Mitigation Measure NOI-6. The noise barrier shall be installed concurrently with the extension of Magnolia Avenue. As detailed in Section 4.16.5.1, Threshold 1: Circulation System Performance, the Magnolia Avenue extension would be implemented as a project design feature prior to the certificate of occupancy of the 1,500th equivalent dwelling unit. A significant impact would not occur to Magnolia Avenue prior to construction of the extension because it would not serve through traffic to the proposed project. The comment also requests clarification on why noise is considered mitigated by existing barriers at Cuyamaca Street for the years prior to installation of the barrier on Magnolia Avenue required in Mitigation Measure NOI-6. The existing noise barriers at residences along Cuyamaca Street north of El Nopal are of sufficient height to provide project noise attenuation to the receptors along these segments of Cuyamaca Street. No noise attenuation from the existing Cuyamaca Street barriers is assumed for Magnolia Avenue.
- I25-12:** This comment requests clarification for how residents may request construction acoustical monitoring data to cross-check compliance. Mitigation Measure NOI-3,

Roadway Construction Notification Data, requires the construction contractor to provide notification to any existing uses within 300 feet of roadway construction and provides a process for resolving noise complaints, which includes noise monitoring at the nearest affected receptor. The results of the noise monitoring would be submitted to the Director of Development Services and would be made available to residents upon request. The submittal requirement has been added to EIR Mitigation Measure NOI-3 (Appendix L, NOI-6) for clarity as shown in the underlined text below:

**NOI-3: Roadway Construction Notification.** In accordance with Section 5.04.090 of the Santee Municipal Code, the construction contractor shall provide written notification to any existing uses within 300 feet of roadway construction activities. The notification shall be provided no later than 10 days before the start of construction activities. The notice shall describe the nature of the construction activities, including the expected duration, and provide a point of contact to resolve noise complaints. If a complaint is received, construction noise shall be monitored by a qualified acoustical consultant at the nearest affected receptor for the duration of a normal day of construction. If the hourly average monitored noise level from construction exceeds a normal conversation level (65

A-weighted decibels) at the nearest sensitive receptor or the ambient noise level at the receptor if the ambient noise level exceeds 65 A-weighted decibels, construction activities in the immediate area of the affected receptor shall cease. Construction shall not resume until activities can be adjusted or noise reduction measures are implemented to reduce noise at the affected receptor to below normal conversation levels (65 A-weighted decibels) or the ambient noise level at the receptor if the ambient noise level exceeds 65 A-weighted decibels. Monitoring results shall be submitted to the Director of Development Services prior to the resumption of construction activities. Measures to reduce noise shall include but not be limited to the following: . . .

**I25-13:** This comment requests clarification regarding monitoring of nighttime construction noise. As required by Mitigation Measure NOI-4, Nighttime Noise Sound Management Plan, the construction contractor would be responsible for implementation of a sound management plan, and the City would be responsible for enforcement of compliance with the City's Noise Ordinance and mitigation measures, including the terms of approval for nighttime construction, if necessary. There are no existing monitoring devices in place, and a resident

complaint would trigger investigation by the City, consistent with Mitigation Measures NOI-3 and NOI-4.

- I25-14:** This comment requests clarification for how residents would be notified of vibration construction activities. As stated in Mitigation Measure NOI-9, Construction Vibration Notification, written notification is required. Notification would be mailed to each receptor within 75 feet of the construction vibration area.
- I25-15:** This comment provides an article that summarizes potential health effects of noise exposure. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I25-16:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I26: Karen Shroeder, July 8, 2020

**I26**

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**From:** Karen Schroeder <karenschroeder@cox.net>  
**Sent:** Wednesday, July 8, 2020 10:48 AM  
**To:** Chris Jacobs  
**Cc:** Karen Schroeder  
**Subject:** Fanita Ranch Revised Draft EIR

Dear Chris Jacobs:

I26-1 | As a Resident of Fanita Ranch, I have Concerns regarding the Development of Fanita Ranch by Home Fed:  
 | Please Respond to the following Questions at Your earliest convenience:

- I26-2 | • My understanding is that this Area is Categorized as: Very High Fire Risk Danger. If this is not the case: What Category does this Project fall under and what are the reasons that make it different?
- I26-3 | • Will Home Fed or any associated Entity be writing Insurance Policies? If Yes- please disclose Names, length of policy term ,etc.
- I26-4 | • Which Additional Companies will write Insurance policies? Please disclose Names, length of policy term, etc.
- I26-5 | • What precise Documentation will be provided and disclosed to potential Home Buyers regarding Fire Risk Danger?
- I26-6 | • Firefighters were able to light backfires to protect Our Home in the past. What is the future Protocol to Protect Our Home?
- I26-6 | • The highest fire risk occurs in the Northern Areas. Why are Senior Housing Units being placed there?

Sincerely,

Karen Schroeder

1

**I26-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I26-2:** This comment states the commenter’s understanding of the Fire Hazard Severity Zone designation and inquires if this understanding is correct. The comment is correct that the project site is in an area designated as a Very High Fire Hazard Severity Zone, indicating that specific fire protection features, materials and construction methods will be required.

**I26-3:** This comment inquires if the project applicant (HomeFed Fanita Rancho, LLC) or associated entities will be writing insurance policies. This is not a CEQA issue. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I26-4:** This comment inquires what documentation regarding fire risks will be provided or disclosed to potential homeowners. Future residents of the proposed project would receive copies of the Fire Protection Plan (Appendix P1) and the Wildland Fire Evacuation Plan

(Appendix P2), along with ongoing outreach materials regarding fire safety. The homeowners association will provide a webpage with pertinent fire risk and fire protection information, as well as evacuation awareness and preparedness planning tools.

- I26-5:** This comment inquires about the ability to light back fires to protect existing residences and the future protocol to protect existing neighborhoods. It is possible under some fire conditions that back fires may not be available as a firefighting tool. This is the case in any landscape where there are nearby homes. However, with the proposed project, there are a number of strategies available for firefighting that are not currently available. For examples, the proposed project represents a large fuel break, which changes fire behavior, slows fire spread, and acts as a barrier between the existing homes and the up-wind open space areas. Additionally, this large fuel break provides opportunities for fire retardant drops to tie into the proposed project's Fuel Management Zones (FMZs) as an anchor point and create wide barriers to halt fire spread. The provision for a 100-foot FMZ along the project border where existing homes occur is another line of defense that would keep flames set back from these existing homes. However, with or without the proposed project, the potential for airborne embers currently exists, and homeowners adjacent to the project site are encouraged to provide

ignition-resistant retrofits, such as ember-resistant vents, Class A roof systems, and other exterior enhancements to harden their homes from airborne embers, the leading cause for structure losses during wildfires.

- I26-6:** This comment inquires about the rationale to put senior housing in the northern areas, which are at greater fire risk. The highest fire risk is in the northeastern and eastern areas of the proposed project based on fuels, terrain, and primary alignment with Santa Ana winds (northeast to southwest and east to west). The senior housing element is in an area that is defensible, includes less aggressive terrain and fuels, and is a short distance from the Village Center, the on-site fire station, and the primary access route. In addition, the senior housing, like all on-site housing, will be provided extreme ignition resistance and FMZs that provide appropriate setbacks and ember resistance. Please refer to Thematic Responses – Fire Protection and Safety and Fire Ignition and Risk for additional details.

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## Comment Letter I27: Daniel Bickford, July 9, 2020

I27

**I27-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Mr. & Mrs. Daniel Bickford <user@votervoice.net>  
**Sent:** Thursday, July 9, 2020 3:44 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

With such a huge portion of the property going to open space forever, I feel this plan is a chance for Santee to get dedicated open space balanced with much needed affordable housing for our young families.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I27-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Daniel Bickford  
8301 Mission Gorge Rd Spc 311  
Santee, CA 92071  
dmbickford@yahoo.com

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## Comment Letter I28: Kristie Chambers, July 9, 2020

I28

**I28-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** kristie chambers <user@voterveoice.net>  
**Sent:** Thursday, July 9, 2020 1:35 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I28-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

kristie chambers  
9406 Pennywood Rd  
Santee, CA 92071  
kristiechambers@yahoo.com

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## Comment Letter I29: Kyle Craig, July 9, 2020

I29

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**From:** Kyle Craig <kylecraig24@gmail.com>  
**Sent:** Thursday, July 9, 2020 11:39 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

We need more homes and more shops in Santee hands down we are in a housing crisis!!

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I29-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Kyle Craig  
15865 Avenida Venusto Apt 811  
San Diego, CA 92128  
kylecraig24@gmail.com

**I29-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I30: Eid Fakhouri, July 9, 2020

I30

**From:** eidcpa@aol.com  
**Sent:** Thursday, July 9, 2020 5:32 PM  
**To:** Chris Jacobs  
**Cc:** Melanie Kush; Marlene Best  
**Subject:** Fanita Revised Draft EIR - Community Comments

Dear Chris Jacobs,

Please see my letter and comments to the Fanita EIR (<https://www.cityofsanteeca.gov/Home/Components/News/News/26679>) below.

Mayor, City Council, City Staff,  
 10 years ago, I stood before the City Council and was an advocate for constructing homes in Fanita Ranch.

**Today, I am here strongly opposing the Fanita Ranch Housing Project**  
 Our open space, roads, lifestyle, commute times, noise and air quality have drastically been negatively impacted during these past 10 years by decisions supported by this Mayor and certain council members.  
 Through ballot initiatives, letters and e-mails the residents have consistently opposed medium and high density housing and destruction of open space in Santee. As a Republican I was ashamed of Mayor Minto's statement at his Golf Course Campaign Fund Raiser. He was recorded saying "the supports Developers because the Developers support him" and later he says "developers are the good people" implying that the residents of Santee are not.  
 See video here: <https://www.youtube.com/watch?v=JnZb54GBrE8>

Sadly, it is clear certain Santee officials are more concerned with promoting the interests of developers while negatively impacting our quality of life.  
 Enough is enough! Santee voters want clean air, reduced traffic, green space and neighborhoods safe from wildfires.  
 Questions:

- I30-1 1. Where is the analysis showing alternative routes through Poway and Lakeside?
- I30-2 2. Where is the current air quality test for the adjacent neighborhoods of highway 52?
- I30-4 3. During these past 15 years, we have seen an increase in black dust coming from the highway. Our homes have a constant layer of black dust that appears to be a foreign particulate that is not from dirt or plants, it appears to be coming from the highway. What is the source and content of this black dust and how will Fanita Ranch traffic add to this pollution?
- I30-5 4. What is the impact of this dust on the children that attend Carlton Oaks Elementary or West Hills High School? Will there be a baseline measurement of this dust be taken from our homes and will the addresses be published?
- I30-6 5. In case of a wildfire evacuation, the Fanita project plan is to turn the bike line on Fanita Parkway into a car lane, how is that possible, will curb parking on the street be illegal on these roads to ensure the lanes are always accessible by vehicles?
- I30-7 6. At council meetings, the pro-build lobby represented by a certain councilman has stated that taxes from homes are not sufficient to maintain roads. Is this statement true? What is the funding plan to maintain the roads of Fanita Ranch, will it come from Property Taxes or other sources? What is the resurfacing cost per Linear Foot of a standard residential road in Santee? What is the average Linear Foot of roads proposed for Fanita Ranch divided by the number of homes? What is the surface life of the roads in Fanita Ranch?
- I30-8 7. The farm as stated in the project plan, is a private business, not a community farm. Will Santee stop calling it a community farm or will Santee require the land be donated to the Santee Food Bank to operate it as a true community farm? Calling a privately owned asset a community asset is misleading and the City has allowed this misinformation to perpetuate in the Council Meetings, publications, City sponsored events and in promotional material.

Thank you,  
 Eid Fakhouri  
 Santee, CA

**I30-1:** This comment provides an introduction to the comment letter and states opposition to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I30-2:** This comment inquires where the analysis shows alternative routes through Poway and Lakeside. Sections 4.16, Transportation, and 4.18, Wildfire, in the EIR evaluate the impacts of additional traffic as a result of the proposed project and the adequacy of both Fanita Parkway and Cuyamaca Street for evacuation. The analyses do not identify the need for additional routes to alleviate traffic or for residents to properly evacuate.

**I30-3:** This comment inquires where the current air quality test is for the adjacent neighborhoods of State Route 52. The current air quality conditions in other areas, such as neighborhoods adjacent to State Route 52, are not the result of the proposed project. The EIR evaluates the potential impacts of the proposed project on the environment. Section 4.2, Air Quality, evaluates the proposed project's potential impacts associated with air quality. This section is supported by information provided in the project-specific Air Quality Analysis

(Appendix C1) and the Health Risk Assessment (Appendix C2). No further response is required.

- I30-4:** This comment states that black dust appears to be coming from the highway and inquires what the source and content of this black dust is. Further, this comment inquires how the proposed project traffic will add to this pollution. The described existing condition is not a result of the proposed project. The EIR evaluates the potential impacts of the proposed project on the environment. Section 4.2 analyzes the potential impacts on air quality due to new traffic from the proposed project and identifies appropriate mitigation measures to reduce those impacts to the extent feasible in accordance with the CEQA Guidelines, Section 15126.4. No further response is required.
- I30-5:** This comment inquires what the impact of the dust on children who attend Carlton Oaks Elementary or West Hills High School will be and if there will be a baseline measurement of this dust taken from their homes. See response to comment I30-4. The described existing condition is not a result of the proposed project. Therefore, the questions raised in the comment are not the responsibility of the proposed project to address.
- I30-6:** This comment asks how bicycle lanes on Fanita Parkway will be turned into a car lane during wildfire evacuation and if curb parking on the street will be illegal on these

roads to ensure they are always accessible by vehicles. Section 4.18.5.1, Threshold 1: Emergency Response Plan or Evacuation Plan, in Section 4.18 analyzes wildfire evacuation after development of the proposed project, including the primary streets that would be used for evacuation from the project site, including Fanita Parkway. As described in Section 4.18.5.1, during an emergency evacuation from the project site, the primary and secondary roadways would be capable of providing resident egress while responding emergency vehicles are traveling inbound. In addition, bicycle lanes would be provided in both directions that can act as emergency lanes for first responders and evacuation lanes for project occupants. Curb parking in the bicycle lanes would not be allowed. Because the roadways are designed to meet or exceed the 2019 California Fire Code requirements, including unobstructed travel lanes consistent with the Fanita Ranch Specific Plan standards, adequate parking, 28-foot inside radius, grade maximums, signals at intersections, and extremely wide roadside fuel modification zones, potential conflicts that could reduce roadway efficiency would be minimized, allowing for smooth evacuations. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety and emergency evacuation. This issue is adequately addressed in the EIR.

**I30-7:** This comment states that they heard taxes from homes are not sufficient to maintain roads and asks if this statement is true. The comment also asks what the funding plan is to maintain roads for the proposed project, what the cost per linear foot is, and what the surface life of the roads are. This comment raises economic issues that are not considered in an EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I30-8:** This comment suggests that the Farm is a private business, not a community farm, and should not be called a community asset. Section 3.3.5, Farm, in Chapter 3, Project Description, describes the Farm as follows:

A community-supported agriculture program, where the consumer receives produce on a regular basis, would be offered. Food grown on the Farm would also be distributed to local schools, restaurants, and other institutional facilities, such as congregated care and assisted living facilities.

The Farm would allow for a range of community activities including farm-to-table events, community harvests, weddings, and other celebrations and festivals. Farm-based education would be provided

as tours, volunteer opportunities, camps, and workshops related to gardening and farmer training, nutrition, cooking, herbal medicines, and home preservation of food. The Village Center and the Village Green would allow the Farm's activities, such as farmers markets and festivals, to expand into the Village Center.

No changes to the EIR have been made in response to this comment.

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## Comment Letter I31: Frank Ferraro, July 9, 2020

I31

**I31-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Frank Ferraro <1stbridgeinc@gmail.com>  
**Sent:** Thursday, July 9, 2020 11:39 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please place smart growth over environmental overreaction.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I31-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Frank Ferraro  
8729 Wahl St  
Santee, CA 92071  
1stbridgeinc@gmail.com

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## Comment Letter I32: Gloria Valenti Gerak and Ronald Gerak, July 9, 2020

I32

I32-1: This comment states that it would be unfair to require 75 percent preservation of small parcels in the City if the proposed project is only required to preserve 66 percent of the land. The reference to 75 percent preservation relates to the approach and requirements for assembling preserve lands in “soft line areas” of the Draft Santee MSCP Subarea Plan. The percentage of land set aside and the requirements for habitat restoration and enhancement for large projects that reach “hard line” status cannot be directly compared to measures that would be applicable to the small parcels located in the “soft line” areas of the Draft Santee MSCP Subarea Plan. This is the case for the proposed project, which in addition to the land that would be preserved on site, includes substantial commitments to conduct habitat restoration and enhancement on the property for species, such as coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*) and Quino checkerspot butterfly (*Euphydryas editha quino*). Such requirements are not proposed to be required for parcels located in soft line areas. In addition, the proposed project includes a commitment to create, restore, or enhance approximately 12 acres of habitat off site, whereas under the Draft Santee MSCP Subarea Plan, no off-site mitigation is proposed as a requirement for parcels located in soft line areas.

**From:** Gloria Valenti Gerak <gvgerak@aol.com>  
**Sent:** Thursday, July 09, 2020 2:20 PM  
**To:** John Mirto; Laura Koval; Ronn Hall; Rob McNelis  
**Subject:** Property Owners are being treated unfairly vs Fanita Ranch

I32-1 It is my understanding that Fanita Ranch has a 66% preservation requirement, but the small property owners have a 75% preservation requirement. How can this be, and how is this fair? May I please have some rationale or facts in the event that I am misunderstanding the situation and the MSCP.

Respectfully,

Gloria Valenti Gerak & Ronald Gerak  
Media Planning & Placement  
9605 St. Andrews Drive  
Santee, CA 92071  
619.562.6622 Office & Fax  
Mobile 619.300.6623



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## Comment Letter I33: Mark Hartley, July 9, 2020

I33

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**From:** Mark Hartley <user@votervoice.net>  
**Sent:** Thursday, July 9, 2020 1:36 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I look forward to the enhanced walking trails Fanita Ranch will provide, 75% dedicated open space will give all the residents in Santee the natural look they want with some greatly needed extra housing our county needs. This new project will be a Gem to Santee, just like the new shopping centers are that were build in the early 2000's.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I33-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Mark Hartley  
12613 W Rim Rd  
Lakeside, CA 92040  
Mark.Hartley@Rocketmail.com

**I33-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I34: Elizabeth McCune, July 9, 2020

**I34**

**I34-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Elizabeth McCune <e.mccune19@gmail.com>  
**Sent:** Thursday, July 9, 2020 10:15 AM  
**To:** Chris Jacobs; Elizabeth McCune  
**Subject:** Fanita Ranch EIR

Principal Planner Jacobs and City Councilmembers,

Please approve the Fanita Ranch project for the good of our city. I'm a retired school teacher who has lived in the area my whole life. I have taught in the Santee School District and am very fond of this community. My years as a school teacher gave me an appreciation for the sense of community that Santee has. There aren't as many renters nowadays, and there are more owners who take better care of their homes, so a development like Fanita Ranch will attract more families that want to own a home, and continue this positive trend in Santee.

I34-1 The city of Santee is on an upswing, so I think that we should take advantage of the moment to include more people in our community and to sustainably grow the population. To balance out the number of homes and space being taken up by structures, Fanita Ranch will also include miles of open space and trails and 78 acres of parks that will be open to the greater Santee community. As an educator, I value spaces where children can play and just be kids. However, there will also be opportunities for students to learn about their community and sustainable farming practices with the addition of an organic farm within the community. I would be eager to volunteer with the farm as there will be opportunities provided for seniors who wish to volunteer to teach children.

I know that a revised EIR for the project has recently come out, and from what I understand, it concluded that the development and all the amenities that will come with it will be environmentally sound.

I also know there is a very loud group who is anti growth in Santee. They do not represent all of us. We need good, well thought out growth to continue to offer strong services to the people of Santee. Fanita Ranch offers this to our community.

Thank you for your consideration.

Best,  
Elizabeth McCune  
9349 Burning Tree Way

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## Comment Letter I35: Nora McIntyre, July 9, 2020

I35

**From:** Nora M. <nora.mcintyre@gmail.com>  
**Sent:** Thursday, July 9, 2020 12:36 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR - Comments

To: City of Santee  
 Below, for your review and response, please find my comments and questions regarding Fanita Ranch Revised Draft EIR.

135-1 **Project Background:** Please include the 40 year history of citizen votes regarding this project in the first paragraph of the Project Background. The citizens of Santee have rejected this project repeatedly and I feel the history of the controversy is not sufficiently captured in the Project Background. How many more times will we discuss this project at the cost of the public? (page 3 of Section 1.0 Executive Summary and in other relevant sections)

**Project Background:** The version of the housing proposal the City Council approved in 2007 was for 1,380 homes and this "modified" version in 2020 is for 3,000 +/- homes. Please include this key difference in number of homes in the first sentence of the second paragraph of the Project Background as 1,380 homes is mentioned in the first paragraph. (page 3 of Section 1.0 Executive Summary and in other relevant sections).

**Table 1-1. Proposed Project Environmental Impacts and Mitigation Measures:** Some of the mitigation measures identify the Applicant's funding plan (funded by City of Santee, HOA, or the Applicant) or the lack of a plan, but other measures don't have any discussion at all. I have a concern that many of the mitigation measures are unrealistic because of the unconfirmed or unclear source of funding. (pages 8 thru 70 of Section 1.0 Executive Summary and in other relevant sections).

- 135-2
- Please identify all mitigation measures that won't be fully funded by the Applicant or the HOA and confirm the ones that will be fully funded by the Applicant or the HOA.
  - Please disclose a rough-order-of-magnitude cost estimate of all measures which will not be fully funded by the Applicant or the HOA to gauge the feasibility of the proposed mitigation measures.
  - Regarding the ones budgeted in the City's Capital Improvement Program, please verify and include verification in the report that there is sufficient budget as this project's mitigation measures. If there is insufficient budget, please identify who will be responsible for the remainder. If balance requires any public money, please provide an estimated amount for a feasibility review.

135-3 **Table 1-1. Proposed Project Environmental Impacts and Mitigation Measures:** Regarding 4.16 Transportation, please verify "Significance after Mitigation" against the VMT study and update the column as applicable. (pages 64 thru 77 of Section 1.0 Executive Summary and in other relevant sections). SB 743 was approved in 2013 and is now in effect as of July 1, 2020. This project will be built at least 10+ years in the future. The impact on the environment by a project of this scale must not be evaluated based on a system that was already challenged and replaced.

135-4

135-5 **NOI-9 Construction Vibration Notification:** Please include a language similar to "if the vibration exceeds 80 vibration decibels, construction activities in the immediate area of the affected receptor shall cease." (Page 62 of Section 1.0 Executive Summary and in other relevant sections).

135-6 The previous developer for Fanita Ranch filed for bankruptcy –thankfully before any road or wilderness of Santee was disrupted. What is the funding/insurance plan if the new Applicant cannot complete the project for any reasons in the next 20 years and leave the roads and wilderness unfinished? Will the City take over the construction? Will any of the contingency money come out of the public? Can and how will the City mitigate this risk?

**I35-1:** This comment requests additional history regarding the proposed project, information regarding public votes on the proposed project, acknowledgment of the proposed increase in dwelling units, and an explanation of project differences from the 2007 housing proposal to the 2020 version be included in Section 1.4 of the Executive Summary and other relevant sections. Section 1.4, Project Background, provides a brief summary of the proposed project's land use proposals over the last 40 years. Section 2.2, also titled Project Background, provides a more extensive history of the environmental review and land use planning for the project site. Historical political decisions regarding the project site are not an environmental issue and are not addressed in the EIR. The increase in number of dwelling units is appropriately found in Section 3.12, Discretionary Actions, under the General Plan Amendment bullet. The former 2007 project is addressed in both Sections 1.4 and 2.2. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I35-2:** This comment requests additional information regarding mitigation funding. Mitigation measures will be fully funded by the applicant or the proposed project's homeowners association. No further response is required.

Thank you,

Nora McIntyre  
9059 Trailmark Way  
Santee, CA 92071

- I35-3:** This comment requests that Table 1-1, Proposed Project Environmental Impacts and Mitigation Measures, in Chapter 1 be verified for the “significance after mitigation” against the vehicle miles traveled (VMT) analysis and updated as applicable. The table has been verified as correct.
- I35-4:** This comment states SB 743 was approved in 2013 and is now in effect as of July 1, 2020, and suggests that the impact analysis should not be evaluated based on a system that was challenged and replaced. The Transportation Impact Analysis (Appendix N) contains both a level of service (LOS) and VMT analysis and the significance of impacts were determined using both metrics. Since the EIR began public review before July 1, 2020, a VMT analysis was not technically necessary to perform. This issue is adequately addressed in the EIR.
- I35-5:** This comment requests that Mitigation Measure NOI-9, Construction Vibration Notification, be revised to include a requirement that construction activities in the immediate area of the affected receptor shall cease if the vibration exceeds 80 vibration decibels. This mitigation measure includes a requirement for the timing of implementation of a vibration monitoring program if required in response to a complaint. If a complaint is received, a vibration monitoring program shall be implemented within 2 working days to reduce vibration

to below 80 vibration decibels at the nearest receptor. This measure would reduce the potential nuisance vibration impact during project construction to a less than significant level. No change was made to Mitigation Measure NOI-9.

- I35-6:** This comment refers to the previous applicant having filed for bankruptcy, requests information on the funding and insurance plan if the current applicant cannot complete the proposed project, and asks if the City will take over the construction. The financial situation of the current applicant has no bearing on that of the previous applicant. The Development Agreement between the current applicant and City will address the completion of public improvements, such as roadway extensions. The majority of the proposed project would be on private property, and the City would have no obligation to pay for any public improvements associated with the development nor complete the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I36: Ralph Potter, July 9, 2020

I36

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**From:** Mr. & Mrs. Ralph Potter <user@votervoicenet>  
**Sent:** Thursday, July 9, 2020 1:37 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

We moved to Santee from Coronado in 2008. Santee is a wonderful bedroom community that has consistently improved itself by adding neighborhoods and businesses that compliment living here. The Fanita Ranch plan has been substantially improved by the developer from what was proposed many, many years ago. The EIR report indicates that the developer has addressed all of our concerns and indicates that this project should go forward. We believe that this project will improve Santee and the improvements to Highway 52 will be enjoyed by everyone. If we were to wait for CalTrans to widen 52 it might be 10 years before it happens, if ever. This project is well thought out and we believe that the impact on Santee will be nothing but positive. We would like to see the City Counsel to certify the EIR report as totally satisfactory and approve this project. It is time to give the green light to proceed.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I36-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ralph Potter  
7114 Mariposa St  
Santee, CA 92071  
ralphpotter100@yahoo.com

**I36-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I37: Krista Reiderr, July 9, 2020

I37

**I37-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Krista Reiderr <user@votervoice.net>  
**Sent:** Thursday, July 9, 2020 11:39 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I37-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Krista Reiderr  
9371 Starcrest Dr  
Santee, CA 92071  
kreiderer@cox.net

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## Comment Letter I38: Rudy Reyes, July 9, 2020

**I38**

**From:** Rudy Reyes <rreyes2777@gmail.com>  
**Sent:** Thursday, July 09, 2020 2:03 PM  
**To:** Chris Jacobs  
**Subject:** Re: Fanita Ranch Draft EIR

**Rudy Reyes**

8655 Graves Ave. 117  
 Santee Ca. 92071  
 (619) 767-8025  
[Rreyes2777@hotmail.com](mailto:Rreyes2777@hotmail.com)

July 09 2020

City of Santee  
 10601 Magnolia Ave.  
 Santee CA 92071  
 (619) 258-4100

Fanita Ranch EIR Letter: Archaeological and Fire Protection

To whom it may concern:

My name is Rudy Reyes, As a state certified archeologist; I was honored to defend Santee in the Quail Brush Power plant as a state recognized intervener. I'm also recognized as the "Hero" and one of the worst injured of the 2003 Cedar Wildfires. I'm submitting this letter to the city of Santee in regards to the Fanita Ranch EIR.

I have reviewed as much of the available archeological information provided in the EIR and have done a basic historical analysis of the project. Due to this project having much of its archaeological and cultural information being deemed confidential as I assumed the development does not want the public to know what has been found. I researched at the SDSU South Coastal Information Center which holds all the archeological records for san diego county. Utilizing record searches and area historical archeological maps, I found much needed information for the council to consider.

I38-1

Archeological records report from 2016 survey of CA-SDI-8345; Identified one likely and three possible human bone fragments which were burned at high temperature, indicating cremation, and that it is extremely likely that this bone represents human Cremations which extend to 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.

As the developers' archaeologists may have confirmed in their Phase I cultural resources report which should review all the previous reports and surveys of the area and should also describe and evaluate a recent "walkover" of the project by the developments archaeologist. Together they will confirm what has been well known for some time: that much of the area proposed to be developed is in an extensive pre-european contact Native American village site. Archeological research shows on this specific site at least four sets of human remains have been identified; location is kept confidential. Archeological evidence points to this being a major Village site. As there is enough artifacts and

I38-2

archaeological evidence that there is a likelihood of further human remains and associated funerary objects. Unfortunately not enough archaeological studying has been performed on this site and this major Village site is of unknown extent and

**I38-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

The comment also refers to the confidential nature of the resources involved. The City of Santee (City) acknowledges the confidentiality of all archaeological resources and, therefore, only made the confidential reports available to those who meet the Secretary of the Interior's Standards.

**I38-2:** The commenter opines that the project site has received inadequate study and claims that it is a "major Village site." Section 4.4.1.2, Previous Research, of the EIR provides a summary of previously documented and additional Phase I surveys conducted by Rincon Consultants, as well as the Phase II testing and evaluation plan completed for archaeological resources on the project site. Additional information regarding these previous studies and the Phase I surveys and Phase II testing and evaluation plan completed in support of the EIR can be found in Confidential Appendices E1, E2, and E4. See also response to comment I173-6 in

- 138-2 cont. nature. To date this site has had no more than the usual simple surface survey and monitoring as if it were a less significant site with smaller resources of less historical significance and without human remains present.
- 138-3 In terms of scoping, I would expect the project to do considerably more than the usual surface survey. I would request that future site surveys be much more intensive so that we would know much more about the exact spatial extent and nature of the village site. Specifically, CA-SDI-8243, Parts of which system subsumed CA-SDI-8338 And it's earlier components identified as CA-SDI-8338a, 8338b, and 8338c. In addition, from my understanding of the phase 1 the current project did not survey or include the low hilltops previously known as CA-SDI-8243a; which was archaeologically known to contain the highest concentration of cultural materials. Nor did you include the valley floor between CA-SDI-8243a and CA-SDI-8338a. Should this project move forward It must include these areas in full in order to determine the true extent and nature of this apparent Village site.
- 138-4 Although mostly unable to acquire much of the information which is available to counsel due to confidentiality, my record searches were more than enough to find that this site is of a high archeological significance value and should be saved for future generations to study. I believe that the Barona band of mission Indians is the most likely ancestry of this site and they should be notified as to consideration of this site. The city of Santee should consider listing this site on the National Register of historic places.
- 138-5 As one of the worst injured of the 2003 San Diego Cedar fires I would also like to take this moment to Advocate and speak out for the need of Fire Protection. The Fanita Ranch proposed project Is a "death trap" waiting to happen. With only a few methods of entry and exit, should a natural wildfire happen and spread throughout this area you would have only limited ability to evacuate. Once you include everybody's traffic trying to evacuate, as we learned from the 2003 and 2007 fires our roads and local freeways can not handle that kind of traffic.
- 138-6 Historically this area has had multiple fires and is known to be unsafe for the public. Even the County Board of Supervisors have recently rejected project's just like Fanita Ranch due to them being unsafe in regards to wildfires. I would argue that the developer has not done enough in order to guarantee that this area would be fire safe. I asked my Santee Council to keep the public safe and also reject this project in the fact that it was never intended to be wild fire safe.

Best regards,

*Rudy Reyes*  
Rudy Reyes

On Thu, Jul 9, 2020 at 9:35 AM Chris Jacobs <[CJacobs@cityofsanteeca.gov](mailto:CJacobs@cityofsanteeca.gov)> wrote:

Mr. Reyes,

- 138-7 Thank you for contacting the Department of Development Services. I appreciate your telephone question on Tuesday regarding LOS/VMT. Your thoughts on this project are valued, as is your participation in the public review process. Please know that public comments will be considered and responded to as required by the California Environmental Quality Act. This is to confirm that any further comments you submit during the public review period will also be included as part of the comments received on the Draft Revised EIR for the proposed Fanita Ranch project.

Please feel free to e-mail back if you have further questions regarding the project.

2

Comment Letter I173 (Rudy Reyes, July 13, 2020) and responses to comments I114-10 and I114-11 in Comment Letter I114 (Margaret Field, July 12, 2020).

- 138-3:** The commenter opines that the project site requires more work than a surface survey and that additional surveys should specifically occur in the low hilltops and valley floor between CA-8243a and CA-SDI-8338a. Section 4.4.1.3, Known Cultural Resources, provides details regarding the additional pedestrian surveys carried out by Rincon Consultants on behalf of the City, which include the areas referenced by the commenter. Additionally, Phase II subsurface testing was completed in consultation with the Most Likely Descendant representative for the proposed project and included known site localities in the development footprint for the proposed project. Information regarding the results of the Phase II Cultural Resources Testing and Evaluation Report can be found in Section 4.4.1.3 and Confidential Appendix E2.

- 138-4:** The commenter opines that the project site is of “high archaeological significance value” and that the Barona Band of Mission Indians (Barona) is the ancestral group for this area. The City has engaged in consultation with Barona for the proposed project. A summary of consultation efforts can be found in Section 4.4.1.3 of the EIR (Known Cultural Resources, Assembly Bill 52 Consultation) and in Confidential Appendix E3.

Consultation with Barona began in September 2018. The parties have agreed to the mitigation measures in the EIR and conditions of project approval to address Barona's concerns. On July 9, 2020, Barona submitted a letter to the City to this effect, with some further changes to the conditions of project approval. On July 31, 2020, the City sent a response to Barona accepting such changes and stating that Assembly Bill 52 consultation had concluded. Section 4.4.1.3 of the EIR and Confidential Appendix E3 has been updated to reflect this information.

- I38-5:** This comment advocates for fire protection and evacuation safety for the proposed project. Please refer to Appendix P1, Fire Protection Plan, and Appendix P2, Wildland Fire Evacuation Plan, for details regarding fire protection and evacuation planning completed for the proposed project and the Thematic Responses for Fire Protection and Safety and Evacuation for information regarding the proposed project's comprehensive fire safety features and evacuation planning and implementation in the City of Santee and the County of San Diego.
- I38-6:** This comment asserts that the project site is unsafe due to historical fire events and that the proposed project does not do enough to guarantee fire safety. Please refer to response to comment I138-6 in comment letter I138 (Sherry Duhamel, July 13, 2020) for additional details regarding the proposed project's high fire safety level.

See also response to comment I38-5 and the Thematic Responses – Fire Protection and Safety and Evacuation.

- I38-7:** This comment repeats comments already made on the EIR. Please refer to Comment Letters I22 (Rudy Reyes, July 7, 2020) and I23 (Gloria Valenti Gerak, July 8, 2020) for responses to these comments.

Sincerely,

Chris Jacobs

Principal Planner

City of Santee

10601 Magnolia Avenue

Santee, CA 92071

619-258-4100, ext 182

[cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

138-7  
cont.



**From:** Rudy Reyes <[rreyes2777@gmail.com](mailto:rreyes2777@gmail.com)>  
**Sent:** Wednesday, July 8, 2020 12:33 PM  
**To:** Chris Jacobs <[CJacobs@Cityofsanteeca.gov](mailto:CJacobs@Cityofsanteeca.gov)>  
**Subject:** Re: Fanita Ranch Draft EIR

That wasn't my intended submission...im working on one currently with emphasis on archeological and fire safety. Just checking that my comments on archeological issues and fire safety will not be ignored when I submit it for council.

RudyReyes

On Wed, Jul 8, 2020, 12:01 PM Chris Jacobs <[CJacobs@cityofsantec.ca.gov](mailto:CJacobs@cityofsantec.ca.gov)> wrote:

Mr. Reyes:

Thank you for your email, which will be included as part of the comments received on the Draft Revised EIR for the proposed Fanita Ranch project. The City will respond to all comments received during the public review period as part of the Final Revised EIR. In the meantime, please note that Section 4.16 of the Draft Revised EIR on Transportation contains an analysis of the project's impacts related to Vehicle Miles Traveled (see Threshold 2).

Sincerely,

Chris Jacobs  
Principal Planner  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071  
619-258-4100, ext 182  
[cjacobs@cityofsantec.ca.gov](mailto:cjacobs@cityofsantec.ca.gov)

**From:** Rudy Reyes <[rreys2777@gmail.com](mailto:rreys2777@gmail.com)>  
**Sent:** Tuesday, July 7, 2020 11:54 AM  
**To:** Chris Jacobs <[CJacobs@CityofSanteeCa.gov](mailto:CJacobs@CityofSanteeCa.gov)>  
**Subject:** Fanita Ranch Draft EIR

138-7  
cont.

138-7  
cont.

I am still reviewing the EIR (will send in comments when I am ready) but one thing that caught my attention now is the report's threshold for "Less than Significant". It's based on level of service (LOS) which is the grading system that's phased away. Under LOS grading system, the impact on an intersection that is currently LOS A and will become LOS D by Fanita Ranch project is "Less than Significant" and doesn't require mitigation (because the threshold for significance is LOS E). However, Senate Bill 743 that was passed in 2015 and is now in effect statewide as of July 1, 2020 replaces LOS with VMT. Traditional transportation impact findings based on LOS are likely to be reversed when the switch to VMT occurs. All impacts this EIR claims "Less than Significant" shall be back-checked based on VMT and the most stringent VMT criteria should be followed if city, county, and state criteria differ.

Please explain?

Rudy Reyes

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## Comment Letter I39: Jerry Rosenbach, July 9, 2020

I39

**I39-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Jerry Rosenbach <jerry@rosenbachcompany.com>  
**Sent:** Thursday, July 9, 2020 11:39 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Fanita Ranch will be a great way for existing Santee residents to move up, stay in and support Santee!

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I39-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jerry Rosenbach  
9587 Mavin Dr  
Santee, CA 92071  
jerry@rosenbachcompany.com

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## Comment Letter I40: Walt Schmidtke, July 9, 2020

**I40**

**I40-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Walt Schmidtke <user@voterveice.net>  
**Sent:** Thursday, July 9, 2020 1:35 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

We have lived in the Fanita Ranch since 1983 and have supported the continued expansion of the Fanita Ranch, this current plan is great and hope construction starts soon.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

**I40-1**

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Walt Schmidtke  
9378 Remuda Ct  
Santee, CA 92071  
RANGERWALT@COX.NET

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## Comment Letter I41: Kevin Scott, July 9, 2020

I41

**From:** Kevin Scott <kevinscott@outlook.com>  
**Sent:** Thursday, July 9, 2020 8:42 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch EIR

Good Morning Chris,

I41-1 | I live in the Silver Country Estates on the north end of Cuyamaca St. in Santee. Most of my neighbors do not support the Fanita Ranch development and have been fighting it for many years. This is because it will have a direct impact on us due to the expansion of Cuyamaca St. as a main thoroughfare in and out of Fanita Ranch. Many of our homes back up directly to Cuyamaca St. and have a block wall that separates our property from Cuyamaca St. Currently the only vehicles that travel on the north end of Cuyamaca St. are the residents that live North of Woodglenn Vista Dr. This results in very minimal road traffic and noise. The Fanita Ranch development plans to expand Cuyamaca St. from two lanes to four and replace the stop signs with traffic lights. Cuyamaca St. will be one of the three main thoroughfares in and out of the development and will probably be the most heavily used due to it being the main route for shopping, restaurants, etc. I can't even imagine how much the road traffic and road noise will increase. This all happening within feet of some of our houses. It will completely destroy the peace and quiet we have now and greatly reduce the values of our homes.

I41-2 | **My question is this. Does the expansion plans of Cuyamaca St. include any improvements to the current walls to alleviate the drastically increased road noise for the houses that back up to Cuyamaca St.?**

I41-3 | This proposed development seems to be spending allot of money on advertising, sponsoring events, campaign funding, and other related improvements to help sway people's opinion on this development. The cost to improve these walls and sound barriers for the people that live so close to the development seems like it could easily be addressed, and it is the right thing to do.

I41-4 | Not to mention this entire development is too large for the City of Santee. To add 10,000 residents to a city of 50,000 is outrageous. The increase in traffic alone will negatively effect the entire city in all capacities.

I41-5 | My neighbors and I are very interested in hearing your response. Thank you

Kevin Scott

**I41-1:** This comment provides an introduction to the comment letter and expresses concern related to potential increases in traffic and noise levels on Cuyamaca Street. The EIR addresses project traffic impacts in Section 4.16, Transportation, and project noise impacts in Section 4.12, Noise. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I41-2:** This comment asks whether implementation of the proposed project would include improvements to existing noise barriers on Cuyamaca Street. The existing noise barriers on Cuyamaca Street north of El Nopal were constructed as a requirement of the Silver Country Estates Development (TM 93-01) with the anticipation that Cuyamaca Street would be eventually constructed as a major roadway (four-lane) classification in accordance with the City of Santee's (City's) adopted Circulation Element at the time the proposed project was approved. The existing walls were accounted for in evaluating potential traffic noise impacts in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards. A minimum noise reduction of 5 A-weighted decibels was assumed for these barriers, consistent with the Technical Noise Supplement to the Traffic Noise Analysis Protocol

prepared by the California Department of Transportation in 2013. As shown in Table 4.12-11, Existing + Project Traffic Noise Levels; Table 4.12-12, Near-Term Traffic Noise Levels; and Table 4.12-13, Year 2035 Traffic Noise Levels, under this conservative assumption, the existing noise walls are sufficient in height to reduce noise levels to below a level of significance. Therefore, improvements to the existing noise walls are not proposed. While not required by CEQA, the applicant has informed the City of their intention to reach out to the commenter to discuss the existing noise barriers.

- I41-3:** This comment requests that improvements to existing noise barriers be included as part of project implementation. Please refer to response to comment I41-2, which addresses the same issue raised in this comment. While not required by CEQA, the applicant has informed the City of their intention to reach out to the commenter to discuss the existing noise barriers. No further response is required.
- I41-4:** This comment states the commenter's opinion that the proposed project is too large and that the increase in traffic will negatively affect the City. Section 4.16, Transportation, adequately analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the

circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. Therefore, project traffic is adequately addressed in the EIR.

- I41-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I42: Robert Shipitalo, July 9, 2020

I42

**I42-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Robert Shipitalo <user@voterveoice.net>  
**Sent:** Thursday, July 9, 2020 3:44 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

As a resident of Santee, I see the decision to move forward with Fanita Ranch as a pivotal decision that will set forward the right path of growth for Santee. I understand the reservations some may have for this project, the biggest of all, whether this project will add to the growing traffic issue on the 52. Ask yourself this when you think critically on this issue, why do people from Santee drive on the 52 in the first place? The answer they drive elsewhere for jobs, shopping, restaurants, entertainment and to visit family and friends. When they leave Santee they add to the congestion, and worst yet, take their buying power with them. I see Fanita Ranch as an opportunity to change this cycle. Fanita Ranch will add jobs and many more enriching opportunities to the residents of Santee. The right path forward takes vision, courage, and leadership. I know not everyone will be pleased. Some hate change just because they hate change. True leadership means making those hard decisions. Not for political gain, but because it is the right thing for the community. In 10 years when we are ALL enjoying the benefits of this project you can look back and know that YOU made the difference by supporting this project. That's leadership!

I42-1 Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Robert Shipitalo  
9932 Settle Rd  
Santee, CA 92071  
Shipitalorm@msn.com

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## Comment Letter I43: Michael Slagle, July 9, 2020

I43

**I43-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Michael Slagle <user@voterveoice.net>  
**Sent:** Thursday, July 9, 2020 11:39 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I43-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Michael Slagle  
9931 Via Wakefield  
Santee, CA 92071  
mikes86@cox.net

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## Comment Letter I44: Jon Stewart, July 9, 2020

I44

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**From:** Jon Stewart <nunnin1234@gmail.com>  
**Sent:** Thursday, July 9, 2020 3:44 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please certify

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I44-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jon Stewart  
1020 Iron Wheel St  
Santee, CA 92071  
nunnin1234@gmail.com

**I44-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I45: James Sullivan, July 9, 2020

**I45**

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**From:** James <sullivanjm1@gmail.com>  
**Sent:** Thursday, July 9, 2020 8:06 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

Mr. Jacobs,

I am writing to you because I strongly oppose the Fanita Ranch Development.

I45-1 I live in Santee and it already takes me over 20 minutes to get onto the 52 highway. Adding more housing without a realistic plan to improve the current situation is irresponsible. Even with 30 prescribed mitigation measures, "impacts to [6] intersections, [5] street segments, and [2] freeway mainline segments would remain significant and unavoidable.

I45-2 On top of that, I am concerned about the fire hazards for the future residents and also my own family. If I already hit traffic just getting to work in the morning, what is it going to look like if we have to evacuate for a fire or another emergency. I am not confident I could get my family to safety in time.

I45-3 Please understand that most residents are against this project and have very serious concerns that are not being met with realistic solutions.

- James Sullivan  
 Santee, CA

Sent from [Mail](#) for Windows 10

1

**I45-1:** This comment states that the commenter is opposed to the proposed project and that adding more housing without a realistic plan to improve the current situation is irresponsible. It also summarizes impact information disclosed in the EIR. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**I45-2:** This comment states the commenter’s concern about fire hazards and the ability to evacuate their family during an emergency. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire

Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

- I45-3:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I46: Jonathan Tolentino, July 9, 2020

I46

**I46-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Jonathan Tolentino <user@votervoices.net>  
**Sent:** Thursday, July 9, 2020 3:44 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I46-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jonathan Tolentino  
10258 Arrow Rock Ave  
San Diego, CA 92126  
jhtolentino27@yahoo.com

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## Comment Letter I47: Dean Velasco, July 9, 2020

I47

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**From:** Dean Velasco <user@votervoicenet>  
**Sent:** Thursday, July 9, 2020 1:35 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

By far the best proposed project ever submitted for this property.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I47-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Dean Velasco  
9314 Darcy Ct  
Santee, CA 92071  
thedefchef@cox.net

**I47-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I48: Sandra Baker Assemi, July 10, 2020

I48

**I48-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Sandra Baker Assemi <sandrabakerassemi@gmail.com>  
**Sent:** Friday, July 10, 2020 10:01 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I48-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Sandra Baker Assemi  
210 E Bradley Ave  
El Cajon, CA 92021  
sandrabakerassemi@gmail.com

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## Comment Letter I49: Craig Barnett, July 10, 2020

I49

**I49-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** craig barnett <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 10:40 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Come on this is the best plan for the city in decades, GET IT DONE.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I49-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

craig barnett  
10132 Montura Ave  
Santee, CA 92071  
craigbarnett@cox.net

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## Comment Letter I50: Richard Bunch, Jr., July 10, 2020

I50

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**From:** Richard Bunch Jr <rbunch@cox.net>  
**Sent:** Friday, July 10, 2020 3:28 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

I50-1 I am in favor of the draft EIR as presented. No project of this size can be accomplished without some environmental damage. This seems to be well thought out and will give Santee a product that we can be proud of!

Richard Bunch Jr  
Santee resident since 1972

Sent from my iPad

**I50-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I51: Ashley Carpenter, July 10, 2020

I51

**I51-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Ashley Carpenter <ashleymegancarpenter@gmail.com>  
**Sent:** Friday, July 10, 2020 9:32 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I51-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ashley Carpenter  
9204 Lake Country Dr  
Santee, CA 92071  
ashleymegancarpenter@gmail.com

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## Comment Letter I52: David Carruthers, July 10, 2020

I52

**I52-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** David Carruthers <user@voterveice.net>  
**Sent:** Friday, July 10, 2020 4:45 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Lets get this moving now ! The east county now has a chance put things in place. We are viable contributor that has been long ignored. Now our time has come. Living next to the ocean is really not that great after a while, have had many people express this to me, they are stuck. We do not want that type of crowd coming here .... East County is where life and growth is.. lets take our stance and make this happen. For many years the east has been looked down on and not involved in county issues and decisions.... hmmm, well, looks like the shoe is on another foot... just saying .. God Bless Santee and East County proper.... !

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I52-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

David Carruthers  
7955 Arly Ct Unit 20  
Santee, CA 92071  
goodbrew1@cox.net

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## Comment Letter I53: Julianna Chambers, July 10, 2020

I53

**I53-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Julianna Chambers <julichambers.sd@gmail.com>  
**Sent:** Friday, July 10, 2020 4:46 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR!

Dear Principal Planner Jacobs,

I am so so SO pleased with the amount of research and consideration that has gone into furthering this project!

As I listened to some of the concerns at the City Counsel meetings, it was easy for me to be slightly dismissive of some of the seemingly minor environmental concerns presented by some community members. I see this project as being a huge benefit to Santee and it's surrounding communities. Reading the report and the mitigation measures that have taken so much into consideration for preserving wildlife, improving the city, funding schools, and encouraging renewable energy made me so excited to bring our family back to Santee!

I believe that the vision and care that has gone into this report is a good reflection of Santee's interests and values.

It would be a shame to hinder this progress in our town based on people who are too scared to make a change because they are focusing on what little they may lose instead of focusing on all they have to gain!

I53-1 Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Julianna Chambers  
950 Wilfred St  
El Cajon, CA 92021  
julichambers.sd@gmail.com

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## Comment Letter I54: Sean-Paul and Julianna Chambers, July 10, 2020

I54

**I54-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Mr. & Mrs. Sean-Paul Chambers <spchambers@gmail.com>  
**Sent:** Friday, July 10, 2020 9:43 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch EIR Consideration

Dear Principal Planner Jacobs,

I54-1 Mr. Mayor and Council members, after reviewing the EIR (at least some of it!) I'm thoroughly impressed with the detail and care taken to address the myriad of concerns surrounding such a far-reaching project. Having lived in 3 countries, and as an Engineer in my profession, I'm convinced that the best way to develop this community is to acknowledge, engage, integrate and protect the surrounding natural environment, neighborhoods, and cultural threads that make up Santee. The Fanita Ranch EIR beautifully represents this goal, and I am so excited with the prospect of raising a family in this community.

THANK YOU for your leadership during COVID, and maintaining safety during the recent protests. In light of these events I'm especially confident that you will provide excellent leadership and guidance for the Fanita Ranch project.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Many thanks,  
Sean-Paul & Julianna Chambers

Sincerely,

Sean-Paul Chambers  
950 Wilfred St  
El Cajon, CA 92021  
spchambers@gmail.com

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## Comment Letter I55: Nelson Chase, July 10, 2020

I55

**I55-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Nelson Chase <ngchase33@gmail.com>  
**Sent:** Friday, July 10, 2020 7:06 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I55-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Nelson Chase  
5840 Severin Dr  
La Mesa, CA 91942  
ngchase33@gmail.com

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## Comment Letter I56: Charlene Costa, July 10, 2020

I56

**I56-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Charlene Costa <flygirl48@gmail.com>  
**Sent:** Friday, July 10, 2020 6:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I56-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Charlene Costa  
1004 Iron Wheel St  
Santee, CA 92071  
flygirl48@gmail.com

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## Comment Letter I57: Howard Dickson, July 10, 2020

I57

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**From:** Howard Dickson <hcdickson77@gmail.com>  
**Sent:** Friday, July 10, 2020 6:55 AM  
**To:** Chris Jacobs  
**Subject:** Please approve Fanita Ranch and the EIR.

Dear Principal Planner Jacobs,

I57-1

With an Engineering Degree from Stanford, and an MBA from Harvard, I worked on many Master Planned Communities since 1970, beginning with the Irvine Company in Newport Beach, and I helped develop many Master Planned Communities over the years. That was why I chose Santee as my home because of Santee's wonderful master planning. In all my years of working with many developers with many EIR's, Fanita Ranch is the most advanced, and by far the best that I have seen, particularly the forward planning, and the detailed delineation of the environmentally sensitive goals and objectives for the development. Please approve the EIR and the project. I can't wait to live in Fanita Ranch!

Sincerely,

Howard Dickson  
7467 Mission Gorge Rd  
Santee, CA 92071  
hcdickson77@gmail.com

**I57-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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# Comment Letter I58: Patricia Digenan, July 10, 2020

**I58** I58-1:

This comment states that the EIR provides very little information regarding the working farm upon which to base any evaluation on its impacts to the proposed project and to City of Santee (City) residents. The comment also states that there are no details about how the community garden and school garden will be built, maintained, or infused in the Common Core standards. This comment describes the commenter’s inquiries about school curriculum and specific details about the garden. The proposed project reserves land for a school on site, and if the land is acquired by the Santee School District, the school district would own and operate the school. The curriculum of the on-site school, including a gardening program, would be up to the Santee School District to decide. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

To: The City of Santee City Council  
From: Patricia Digenan, 15836 El Monte Rd Lakeside CA 92040  
Re: Revised Draft EIR, Fanita Ranch Project  
Date: July 10, 2020

To Whom It May Concern:

My name is Patricia Digenan; I am a retired schoolteacher whose expertise is in science and in agricultural sciences. I am a retired California Highly qualified science and agriculture teacher that has built an agriculture program and school garden, started one of the very first middle school FFA programs in the state of California, who has coached state and nation award winning science fair students and as a lead teacher and early adopter of the Next Generation Science Standards (NGSS).

Below are my comments on the Fanita Ranch projects ‘working farm.’

The Revised Draft EIR for the Fanita Ranch provides very little information upon which to base any evaluation by the public on its impacts to project and to Santee residents.

“The Fanita Ranch Specific Plan designates 38.2 acres of land for Agricultural uses, including 27.3 acres of consolidated area for the development of a centralized Farm in Fanita Commons. In addition, many of the parks and recreation areas would incorporate edible landscape materials and community gardens. Education programs for homeowners to encourage the use of sustainable and edible vegetation on individual lots would be provided at the Farm. The preferred nearby K-8 school site would provide the school district with the opportunity to incorporate agricultural activities into the education curriculum and explore “farm lab” opportunities, which would give students access to healthy, locally grown food, school gardens, and educational opportunities.” Page and Section

I have concerns that need to be addressed in the revised EIR to ensure that the public gets full disclosure with regard to the impacts of this project.

**Details of the Community and School Garden**

I do not see details of how this community garden and school garden is going to be built, maintained or how the garden is going to be infused into the common core standards or the Next Generation science standards that the teachers need to meet.

I also do not see that the 21<sup>st</sup> century learning skills are being addressed, outline or coordinated. The students need to be able to take the CAASPP test as well so students need to have relevant lessons that helps them prepare for the test both with curriculum based learning but also technological experiences. Therefore they need to learn how to use science equipment and interpret data. It is my experiences if you fail to plan you plan to fail. You need have a lead teacher at the K-8 school that is going to coordinate garden use, You need to build a community at the school that utilizes the garden as a learning lab and you need to build and

I58-1

158-1 cont.

fund a team of teachers to write the curriculum? Who is funding this undertaking? The teachers' day is already full especially and the school districts are always strapped for money and need to make sure all curriculums meets the strict California state educational standards. The garden will not be used if you are simply adding to their already busy day and not making a case for its relevance as a learning laboratory. Therefore a rigorous curriculum with well written lessons plans that are easy to follow, are fun and engaging and highlight the 21st century learning skills, the NGSS and the common core standards that are being taught and met. Please see attachments and use in building the garden lab curriculum specific to the needs of the students and teachers at the Fanita k-8 School.

The garden will need science lab equipment that the students can use for the work in the gardens where they can use and develop their technology skills. Such lab equipment needs to be student friendly, accurate and Mobil I suggest equipment such as Probe ware, microscopes, soil testing equipment etc. Again how are you funding this? At least 100,000 dollars needs to be set aside for the science equipment.  
<http://www.espsciencetime.org/downloads/Probeware%20Brochure.pdf>

21<sup>st</sup> century learning skills:  
<https://www.edglossary.org/21st-century-skills/>

NGSS Standards and guidelines California adoption for K-12  
<https://www.edc.ca.gov/pd/ca/sc/ngssstandards.asp>

Common Core Standards and guidelines:  
<https://www.edc.ca.gov/bc/st/ss/documents/finalccacsstandards.pdf>

At the school, where is the garden is going to be built. Where is the garden located? How much land is being set aside for the garden? Is a tool shed being built? Are you providing a budget to fund and run the garden? Soil testing needs to be done on soil and the appropriate amendments need to be made. The garden needs a water source and irrigation. Planting beds need to be built. Some steps that need to be laid out, discussed, planned and coordinated.

School gardens are sown with similar considerations but vary based upon its geographic location, funding, grade level involvement, size, type and purpose. Issues that are not addressed in this plan and should be addressed in the revised EIR are: 1) Available Space 2) Resources and Build Partnerships, 3) Health and viability of the soil.

**Permaculture**

158-2

The EIR speaks to the issue of permaculture, without defining what it is. It is more than a vocabulary word. Permaculture requires the establishment of trees first. How are these trees going to be irrigated and maintained? Is the runoff from the garden going to be diverted from the San Diego River so not to add pollutants and organic matter into the stream? Why is the focus on permaculture as it usually is a rather water intensive gardening technique and also is not usually a form of gardening used for community gardens. Are the community members

**158-2:** This comment states that the EIR speaks to permaculture without defining what it is and asks how the trees are going to be irrigated and maintained. The EIR does not specifically discuss permaculture. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also asks if runoff from the garden would be diverted from the San Diego River so as to not add pollutants and organic matter into the stream. It is not clear what garden the commenter is referring to. See comment I58-1 for a response regarding the curriculum of the on-site school, including a gardening program. Section 4.9, Hydrology and Water Quality, in the EIR analyzes the impacts of stormwater runoff from the project site. The proposed project would be required to comply with all applicable regulations pertaining to water quality. The EIR concluded that the proposed project would result in less than significant impacts to water quality. This issue is adequately addressed in the EIR.

158-3 using this garden allowed to garden their own plots. Are square foot gardening, hydroponics, aquaculture and other gardening techniques going to be taught and best practices fostered. Who is the garden coordinator and how are they funded? What kind of fencing are you using? How are you protecting the garden from vitalization? Are you providing drinking water and restrooms at the community garden? Do you have an onsite security station to protect the garden and keep vandals away? This can be considered an attractive nuisance and can be a place for teenagers to hangout, drink, get hurt and or get in trouble if not monitored? Is composting going to be taught and encouraged? Is the garden open to gardeners with disabilities and is the garden ADA compliant?

158-4 **What is the proposed water source?** There needs to be water quality studies if digging well and using groundwater for your gardens what pollutants, salts or metals are in your groundwater? If using municipal water sources is it high in salts? Do you need to use a water softener? Too much salt will cause plant damage and over time cause alkaline soils and soil that will not support healthy plant growth. It's hard to calculate the water usage or amount without knowing what plants and trees are going to be planted. Do you have a proposed list of plants and can you give us a ballpark figure of the water needed to irrigate the plants? Also can you show us your calculations? So we can better understand how much water is going to be used and can you tell us who pays for the water that is used. How are rodents and pests going to be managed and who is responsible for the abatement?

158-5 You mention a vineyard but I do not see it in your plans can you please show plans and describe.

158-6 You mention a military training area and possible munitions. I request you check for possible unexploded ammunition? Also please check for heavy metals or radiation from these munitions?

**Valley Fever and Tilling the Soil, dirt work and grading**

158-7 Your air quality study did not check for the presence of Valley Fever. Valley Fever or Coccidioidomycosis is a dangerous disease. Valley fever is an infection caused by the fungus *Coccidioides*. The fungus is known to live in the soil in the southwestern United States and parts of Mexico and Central and South America. It is endemic in Lakeside. It's occurrence seems to be spreading, experts are not sure why but suspect it has to do with Climate Change. People can get Valley fever by breathing in the microscopic fungal spores from the air, although most people who breathe in the spores don't get sick. Usually, people who get sick with Valley fever will get better on their own within weeks to months, but some people will need antifungal medication. Valley Fever can cause severe illness, including It's difficult to prevent exposure to *Coccidioides* in areas where it's common in the environment, but people who are at higher risk for severe Valley fever should try to avoid breathing in large amounts of dust if they're in these areas. Students and families must be protected from this very dangerous pathogen.



**158-3:** This comment asks several questions about the details of the garden, including funding, types of gardening techniques that would be taught, who the gardening coordinator would be, if there would be on-site security, if there would be an on-site security station, if composting would be taught, and if compliance with the Americans with Disabilities Act would occur for the garden. Section 3.9 states that community gardens would be throughout the proposed project. The specifics regarding the community gardens are not yet known. However, the Development Review Permit for the Farm requires that the project applicant prepare and submit a Farm Operations Manual that addresses the ongoing operations of the Farm. The Santee Director of Development Services is tasked to review the manual for consistency with the adopted Fanita Ranch Specific Plan which not only addresses the Farm but also the agricultural landscapes that are to be provided throughout the community.

**158-4:** This comment asks what the proposed water source for the garden would be, if the water source would be high in salts, if an alkaline water softener would be needed, if there would be a proposed list of plants and water needed to irrigate these plants, and how the water would be used. Section 3.4.2, Water Supply, in the Project Description, states that water would be supplied by the Padre Dam Municipal Water District (PDMWD). Section 4.17.5.2,

Threshold 2: Water Supply Availability, in Section 4.17, Utilities and Service Systems, analyzes the proposed project's impact on water supply availability and details the water demand for the proposed project. The proposed project would implement water-efficient irrigation and landscaping to reduce water demand. The EIR concludes that Padre Dam Municipal Water District would have adequate capacity to serve the proposed project, including irrigation for the landscaping and gardens, with the additional confirmed supplies from the San Diego County Water Authority's accelerated forecast growth. With respect to the types of plants to be planted at the Farm, that would be the responsibility of the Farm operator at the time the Farm is in operation. This comment is adequately addressed in the EIR. The comments regarding salt content and water softeners do not pertain to the adequacy or accuracy of the EIR. Therefore, no further response is required.

This comment also asks how rodents and pests would be managed and who would be responsible for the abatement. Rodents and pests would be managed by individual property owners, the homeowners association, and/or the Farm operator.

- 158-5:** This comment states that the vineyard is not in the plans and asks for the vineyard to be shown. The vineyards are depicted on Figure 3-15, Landscape Plan in Chapter 3, Project Description.

- I58-6:** This comment states that the EIR mentions a military training area and possible munitions and requests that possible unexploded munitions and heavy metal or radiation be checked. Section 4.8.1.1, Environmental Site Assessment, in Section 4.8, Hazards and Hazardous Materials, discussed how unexploded ordnances in the former Camp Elliot west of the project site have been removed by the U.S. Army Corps of Engineers. Further, according to the Phase I ESA (Appendix I), it is unlikely that unexploded ordnances are present on the project site, and no further investigation on the project site is recommended. This issue is adequately addressed in the EIR.
- I58-7:** The comment focuses on Valley Fever, describing the spores and results of being infected with the disease. The City has considered the potential for *Coccidioides* fungus to occur during construction of the proposed project, particularly as it may occur during construction in the northern half of the project site in Vineyard Village, Fanita Commons, and Orchard Village. A more detailed discussion of the City's consideration of potential Valley Fever impacts has been added to Section 4.2.5.2, Threshold 2: Cumulative Increase in Criteria Pollutant Emissions, in the EIR in response to the comment, and the Air Quality Analysis in Appendix C1 of the EIR has been supplemented with a Valley Fever Technical Report (Appendix E).

The California Department of Public Health, the County of Los Angeles, the County of San Diego all recommend watering topsoil prior to and during earth disturbance in order to reduce airborne dust emissions and the spread of *Coccidioides* spores. *Coccidioides* fungus thrives in arid environments. Without water the *Coccidioides* fungus eventually desiccates into spores. Watering during earth disturbance activities significantly reduces airborne spores and the ability of workers to inhale spores, which is the route of infection.

The proposed project is required to implement the dust control measures listed in compliance with the SDCAPCD Rule 55, which prohibits discharges of visible dust emissions into the atmosphere beyond the property line for periods longer than 3 minutes in any 60 minute period. SDCAPCD also requires use of any of the following or equally effective trackout/carry-out and erosion control measures that apply to the project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; use of secured tarps or cargo covering, watering, or treating of transported material for outbound transport trucks. With implementation of these regulatory requirements, impacts related to *Coccidioides* for both on-site and off-site adjacent uses would be less than significant.

Section 4.2.5.1 of the EIR includes Mitigation Measures AIR-1 (Rule 55 Dust-Control Measures) memorializing what is required under SDAPCD Rule 55. Mitigation Measure AIR-1 includes provisions requiring that visual fugitive dust emissions monitoring shall be conducted during all construction phases. Visual monitoring shall be logged. If high wind conditions result in visible dust during visual monitoring, this demonstrates that the measures are inadequate to reduce dust in accordance with SDAPCD Rule 55, and construction shall cease until high winds decrease and conditions improve. In addition, the EIR includes AIR-2 (Supplemental Dust-Control Measures) that would reduce fugitive dust emissions even further and the chance of causing *Coccidioides* fungus spores to become airborne.

Though impacts related to Valley Fever would be less than significant, in response to the comment, Mitigation Measure AIR-2 has been revised to provide additional clarification on the precautions that would be carried out to reduce the likelihood of Valley Fever even further. Mitigation Measure AIR-2 has been revised as follows:

**AIR-2: Supplemental Dust-Control Measures.** As a supplement to San Diego Air Pollution Control District Rule 55, Fugitive Dust Control, the applicant shall require the contractor to implement the following dust-control measures during

construction. These measures shall be included in project construction documents, including the grading plan, and be reviewed and approved by the City of Santee prior to issuance of a grading permit.

- The construction contractor shall provide to all employees the fact sheet entitled “Preventing Work-Related Coccidioidomycosis (Valley Fever)” by the California Department of Public Health and ensure all employees are aware of the potential risks the site poses and inform them of all Valley Fever safety protocols, occupational responsibilities and requirements such as contained in these measures to reduce potential exposure to Coccidioides spores.
- Apply water at least three times per day at all active earth disturbance areas sufficient to confine dust plumes to the immediate work area.
- Apply soil stabilizers to inactive construction areas (graded areas that would not include active construction for multiple consecutive days).
- Quickly replace ground cover in disturbed areas that are no longer actively being graded or disturbed. If an area has been graded or disturbed and is currently inactive for 20 days or more but will be disturbed at a later time, soil stabilizers shall be applied to stabilize the soil and prevent windblown dust.



- Limit vehicle speeds on unpaved roads to 20 mph unless high winds in excess of 20 mph are present, which requires a reduced speed limit of 15 mph. Vehicle speeds are limited to 30 mph for onsite haul roads that are paved with gravel to suppress dust or where visual dust is watered and monitored frequently enough to ensure compliance with SDAPCD Rule 55.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

Also, see response to comment I106-9 (Comment Letter I106, Robin Rierdan, July 11, 2020) on Valley Fever.

This comment further provides a map of the United States showing the range of Valley Fever and states that Valley Fever can never be fully eliminated from the body. Valley Fever is caused by inhaling the spores of the *Coccidioides* fungus. According to the CDC, San Diego County is a suspected endemic area for *Coccidioides*. The City reviewed the potential for *Coccidioides*, determined the proposed project would have a less than significant impact, and provided additional clarification to Mitigation Measure AIR-2 to further reduce the potential exposure of Valley Fever as discussed in response to comment I58-7.

158-7  
cont.

The map above shows its endemic presence in the Southwest. Valley Fever can never be fully eliminated from the body. It hides only to re-emerge when the immune system gets weak and cannot keep it in check. It can erupt anywhere in the body, either on the skin or internally.

158-8



**I58-8:** This comment has no text but contains two photos, one of a deformed hand and another that cannot be distinguished. Sources for the images are not provided, and thus, the assumption that the photos represent effects of Valley Fever cannot be verified. Concerning Valley Fever, please see response to comment I58-7 . Also, see response to comment I106-9 (Comment Letter I106, Robin Rierdan, July 11, 2020) on Valley Fever.

Valley Fever can also infect dogs and other mammals. This project and the farm site need to be assessed for Valley Fever before any tilling or disturbance of the soil occurs. Schools and school students are classified by CEQA as sensitive receptors.



Lastly, although CEQA is silent on economic viability, the developer HomeFed has used Coastal Roots Farm as a model to give the community an idea of what this farm might be like. They have even gone so far as offered bus tours of the facility to Santee residents to excite them about the prospect of a farm. A closer analysis of the IRS 990s for 2017 shows farm-generated revenues of 140,844, while expenses are 1,221,879. This is a net loss of \$1,081,035. The way this farm stays in operation is via an annual grant from Jewish Family Services and other funders of 1,079,666.

The plan does not say who will operate the farm. What happens to the land if the farm fails, as it seems likely to do? The EIR does not say who will subsidize it. The latest Coastal Roots Farm 990 is attached to this letter.

I thank you so very much for considering my comments. I am looking forward to reading the revised EIR with more detail as to how this farm will be developed, managed and funded.

Sincerely

Patricia Digenan

158-9

158-10

**158-9:** This comment states that the proposed project and Farm site would need to be assessed for Valley Fever before any disturbance of the soil occurs. Please refer to response to comment 158-7, which raises the same issue as this comment.

**158-10:** This comment states that the EIR does not say who will operate the Farm and asks what will happen to the land if the Farm fails. A professional Farm operator would manage the Farm. Section 3.3.1.6, Agriculture Overlay, in Chapter 3, Project Description, states that, if the Farm were to fail, the underlying land use, Open Space, would take effect. The remainder of this comment is a concluding comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I59: Nick Diviesti, July 10, 2020

I59

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**From:** Nick Diviesti <baggio620@att.net>  
**Sent:** Friday, July 10, 2020 7:06 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I59-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Nick Diviesti  
1206 Calabria St  
Santee, CA 92071  
baggio620@att.net

**I59-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I60: Ray Espinoza, July 10, 2020

I60

**I60-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Ray Espinoza, sr <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 4:47 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Our great city needs this revenue

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I60-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ray Espinoza  
10955 Easthaven Ct  
Santee, CA 92071  
Espinozara68@hotmail.com

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## Comment Letter I61: Liz Finch, July 10, 2020

I61

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**From:** Liz Finch <user@votervoicenet>  
**Sent:** Friday, July 10, 2020 2:18 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I love the Fanita Ranch Community Plan I believe it is well need in the Santee and East County Cities. The sense of well being, hiking, park like atmosphere along with sustainable gardens and healthy life style. I thing there plans says it all. We have the landscape for it and need to update our City with new improved business and smart housing. I believe they did right.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I61-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Liz Finch  
11320 Crazy Horse Dr  
Lakeside, CA 92040  
MLAFINCH@COX.NET

**I61-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I62: Megan Forbell, July 10, 2020

**I62**

**I62-1:**

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**From:** Megan Forbell <mforbell@guhsd.net>  
**Sent:** Friday, July 10, 2020 6:15 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

I62-1 I am a Santee resident that recently discovered the beauty of Fanita ranch. My first time walking there I was amazed how I felt transported to a secret piece of nature. I live along Carlton oaks and despite commuting south on the 125 to spring valley it can take me 30 minutes just to get on the freeway in the morning. Santee is a sanctuary in San Diego and it closeness to nature should be preserved and the traffic should be improved not impacted more.  
 Sincerely,  
 Megan Forbell

This comment states the commenter’s enjoyment of the natural areas on the project site and how nature should be preserved and traffic should not be impacted more. Please note that, at the present time, the project site is private land and is not open to the public. The property is fenced, and “no trespassing” signs are posted. However, as discussed in Chapter 3, Project Description, in the EIR, the proposed project would provide 35 miles of public trails and would provide for the management of the Habitat Preserve in perpetuity.

Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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## Comment Letter I63: Ashley Gooden, July 10, 2020

I63

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**From:** Ashley Gooden <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 5:44 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I strongly believe HomeFed has done their homework. They want to not only develop and create homes, but they have a lot planned to give the community what they want and address the concerns well. I was raised in Santee, went to school in Santee, and now have my kids in school in Santee. My family is currently looking to purchase in Santee and there is not enough availability. I understand that it's not something that would happen overnight, but so many want to live here and this would greatly help.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I63-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ashley Gooden  
1713 Pepper Dr  
El Cajon, CA 92021  
ashlash23@yahoo.com

**I63-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I64: William Guenette, July 10, 2020

I64

**I64-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** William Guenette <bill2460@sbcglobal.net>  
**Sent:** Friday, July 10, 2020 11:41 AM  
**To:** Chris Jacobs  
**Subject:** Re: Fanita Ranch EIR

Mr. Jacobs:

The Draft Revised EIR makes it clear that Fanita Ranch will not be harmful to Santee's environment or community. In fact, I think that it will be a positive addition to the city. There will be more than 37,000 trees planted to offset the city's carbon footprint, something that will also make our community more beautiful.

I64-1 Santee is a beautiful place to live, and the project is going to preserve that for the entire community to enjoy. There will be a huge network of trails that will maintain habitat and species preservation so everyone can enjoy our natural environment without harming it. The project is protecting the land while still allowing everyone access. 78 acres of parks will even be open to citizens of Santee, which is something so many of us are excited for.

We need to preserve Santee's environment and keep our community beautiful, and Fanita Ranch will do just that.

Sincerely,

William Guenette  
Mesa Heights Rd, Santee

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## Comment Letter I65: Derek Hadge, July 10, 2020

I65

**I65-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Derek Hadge <user@votervoicenet>  
**Sent:** Friday, July 10, 2020 6:20 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

"Nothing is more powerful than an idea whose time has come." - Victor Hugo

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I65-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Derek Hadge  
9525 Marilla Dr  
Lakeside, CA 92040  
derek\_hadge@yahoo.com

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## Comment Letter I66: Jeff Hayes, July 10, 2020

I66

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**From:** Jeff Hayes <user@voterveice.net>  
**Sent:** Friday, July 10, 2020 2:01 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I support this Development 100%.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I66-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jeff Hayes  
10094 Shenandoah Dr  
Santee, CA 92071  
jeffhayes1313@yahoo.com

**I66-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I67: Eric Hays, July 10, 2020

I67

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**From:** Eric Hays <user@votervoicenet>  
**Sent:** Friday, July 10, 2020 4:55 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I67-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Eric Hays  
8545 Clifford Heights Rd  
Santee, CA 92071  
erichays211@yahoo.com

**I67-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I68: Mark Howell, July 10, 2020

I68

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**From:** Mark Howell <user@voterve.net>  
**Sent:** Friday, July 10, 2020 9:43 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I68-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Mark Howell  
2230 Hillslake Dr  
El Cajon, CA 92020  
mhowell10@cox.net

**I68-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I69: Mary Hyder, July 10, 2020

**I69**

July 10, 2020

Chris Jacobs, Principal Planner  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071  
 Telephone: (619) 258-4100, extension 182  
 Email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

Subject: Fanita Ranch Revised Draft EIR

Dear Principal Planner Jacobs,

I69-1 Below please find my comments and questions to the draft EIR for the proposed Fanita Ranch.

I69-2 Traffic is a huge concern for me. For starters, I am alarmed that the EIR summary says, *"Based upon the analysis and conclusions in the Draft Revised EIR, the project would result in potentially significant, unavoidable environmental impacts related to: i) air quality; ii) noise; iii) recreation; iv) transportation; and v) utilities. The project would result in potentially significant impacts that would be reduced to less than significant with implementation of mitigation measures related to: i) air quality; ii) biological resources; iii) cultural and tribal cultural resources; iv) geology and soils (including paleontological resources); v) greenhouse gas emissions; vi) hazards and hazardous materials; vii) noise; and viii) transportation."*

I69-3 I find it hard to believe that traffic would be reduced to less than significant with implementation of mitigation measures when for example, TRA-21 Mast Boulevard: State Route 52 to West Hills Parkway (Direct) Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? Going from an F to an F shows NO improvement. If Fanita Ranch is approved the City of Santee risks adding literally thousands of more commuters to already choked transportation routes. Many other transportation routes within the EIR show similar fails without improvement with proposed mitigation. The City of Santee should not consider approving Fanita Ranch if plans that would truly mitigate traffic issues are not taken.

I69-4 I, like 80 percent of Santee residents, work outside Santee. My pre-Coronavirus morning commute from Santee to Sorrento Valley via West 52 to North 805 to my work destination would take 45-60 minutes and my return from work to home via South 805 to 52 East to Mast/West Hills would take 60-75 minutes.

I69-5 I am concerned that commuter traffic that was unbearable pre-Coronavirus will get even worse if this Fanita Ranch development with its close to 3,000 homes is approved. Even

**I69-1:** This comment provides an introduction to the comment letter and does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I69-2:** This comment states the commenter's concern with traffic. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR. This comment also summarizes impact information disclosed in the EIR. This portion of the comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- I69-3:** This comment states that traffic would not be reduced to less than significant with implementation of mitigation measures, specifying TRA-21, Mast Boulevard: State Route 52 to West Hills Parkway, and that similar routes would not be improved with mitigation. As stated in response to comment I69-2, the EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. Additional lanes are proposed as mitigation measures at the Mast Boulevard intersections with both the State Route (SR-) 52 westbound ramps and West Hills Parkway, which would increase the amount of traffic the segment between the two intersections can accommodate. The conclusion of impact TRA-21 is that the impact was not fully mitigated. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).

- 169-4:** This comment describes the commenter’s commute times to and from work. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- 169-5:** This comment states the commenter’s concern about increased traffic causing loss of life in the event of an emergency evacuation. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (2020) and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR. See Thematic Response – Evacuation.

169-5 more alarming than trying to get to work on time with commuters clogging the roads (over staggered work times) would be EVERYONE needing to leave at the same time in the event of an emergency like a fire. Residents would go from traffic impacting their **quality of life** (in the case of work commutes) to traffic potentially causing **loss of life** in the case of an emergency.

**TRA-1 - Construction Traffic Control Plans**

169-6 A lot of what will or won't be allowed are discussed in this section. In the no deliveries found in the 3rd dash there is an exception for *"Deliveries of emergency supplies or equipment necessary to secure the site or protect the public would be permitted."* My question is what are considered emergency supplies or equipment? Could a late delivery of tools or machinery be considered "emergency supplies"?

169-7 In the third bullet point *"Provide off-site construction worker parking areas and shuttles for workers to/from the job site, if necessary."* Have those construction worker parking areas been identified? If yes, where will the construction worker parking areas be located? Is there an estimated headcount for the number of construction workers that will be working on this project during each phase? If yes, how many construction workers are anticipated to be at the project for each phase?

169-8

169-9 In the eleventh bullet point *"Detours for cyclists and pedestrians when bike lanes or sidewalks must be closed"* and in the fifteenth bullet *"Notify emergency response providers of street closures at least one week prior to closures and include the location, date and duration of the closure."* What will be done to provide the residents advance notice of closures? Frankly, at least one week is not enough advance notice for folks to coordinate car pools, commute times for work or doctors' appointments.

169-10 In the seventeenth bullet *"In addition, vendor trip limitations shall be imposed, which would prohibit vendor truck trips on Cuyamaca Street and Magnolia Avenue and require all trucks to use Fanita Parkway for site access. Worker vehicle trips would be allowed on all roadways."* My questions are: how many vendor trips are anticipated? Do vendors fall outside of the construction worker category mentioned in the third bullet? If Fanita Parkway is the route to access the site, what streets would be allowed for these trips by vendor trucks?

**TRA-2 Princess Joann Road/Cuyamaca Street Intersection (Year 2035 Cumulative)**

169-11 This section states *"As part of the proposed project, this intersection would be constructed as a project design feature. By year 2035, with ambient growth assumed from buildout of the Santee General Plan land uses, a cumulative impact would occur."* What is meant by ambient growth? How did this report get to the assumption of *"growth assumed from buildout of the Santee General Plan land uses"*?

169-12 This section also discusses *"...prior to occupancy of the 890th equivalent dwelling unit the proposed project shall install a traffic signal..."*.

**169-6:** This comment states that what is considered emergency supplies and equipment is not identified in the EIR and questions if late delivery of tools or machinery would be considered emergency supplies and equipment. Emergency supplies would consist of supplies that would be needed to secure the site or protect the public. A late delivery would not constitute an emergency and should not be allowed.

**169-7:** This comment questions if construction worker parking areas have been identified and, if so, where these areas will be. Because of the size and configuration of the proposed project, it is anticipated that no off-site parking would be required.

**169-8:** This comment asks if an estimated number of construction workers on the project site during each phase has been determined and, if so, what that number is. Section 4.2, Air Quality, details the worst-case construction assumptions for the proposed project. Based on the California Emissions Estimator Model (CalEEMod) default assumptions, the busiest phase of construction would generate approximately 1,099 total daily worker vehicle trips to and from the project site.

**169-9:** This comment asks what will be done to provide residents advance notice of road closures. Residents will be notified of any closures via signage that would be

placed a minimum of 2 weeks before a closure would occur. Detour plans would be provided per City of Santee (City) standards.

**I69-10:** This comment asks how many vendor trips are anticipated; if vendors fall outside of the construction worker category mentioned; and if Fanita Parkway is the route to access the site, what streets would be allowed for these trips by vendor trucks. Vendor truck trips are in addition to the estimated worker vehicle trips. Refer to response to comment I69-8 regarding worker vehicle trips. Section 4.2 details the worst-case construction assumptions for the proposed project. Based on CalEEMod default assumptions, a maximum of 156 daily vendor trucks (312 daily vendor truck trips) would access the site during the peak construction period. Vendor trucks would be allowed to enter the site via Fanita Parkway or Cuyamaca Street. Mitigation Measure TRA-1 in Section 4.16.5.1, Threshold 1: Circulation System Performance, has been clarified as follows:

- In addition, vendor trip limitations shall be imposed, which would prohibit vendor truck trips on ~~Cuyamaca Street~~ and Magnolia Avenue and require all truck traffic to use Fanita Parkway or Cuyamaca Street for site access. Additionally, medium- and heavy-duty truck trips shall be limited on Fanita Parkway. Truck trips shall be limited to 170 one-way trips (85 two-way trips) on Fanita Parkway

during Phase 1 building construction activities and to a maximum of 140 one-way trips (70 two-way trips) on Fanita Parkway during simultaneous building construction activities and project operation. Worker vehicle trips would be allowed on all roadways.

The modification to Mitigation Measure TRA-1 does not result in any change to the conclusion that the identified construction traffic management plan would reduce impacts to a less than significant level.

- 169-11:** This comment asks what is meant by ambient growth, and how the EIR reached the “growth assumed from buildout of the Santee General Plan land uses.” Ambient growth is general traffic growth separate from project traffic. Existing traffic and forecasted Year 2035 traffic are known, and the amount of forecasted ambient traffic was interpolated between those two volumes.
- 169-12:** This comment asks when the 890th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 890th unit could be built 3–4 years after construction begins.

169-12	What is the timing for when the 890th equivalent dwelling is expected to be completed prior to occupancy?
169-13	Am I correct is looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #1 saying Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals an E grade? How does dropping 2 grades translate into "these improvements would mitigate the impact to below a level of significance" stated at the bottom of this TRA-2 section?
169-14	<b>TRA-3 Ganley Road/Fanita Parkway Intersection (Direct and Year 2035 Cumulative)</b> This section states "...prior to occupancy of the 1,917th equivalent dwelling unit, the proposed project shall install a traffic signal...".  What is the timing for when the 1,917th equivalent dwelling is expected to be completed prior to occupancy?
169-15	Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #3 saying Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals an F grade? How does this translate into, "Implementation of these improvements would mitigate the impact to below a level of significance". Going from a C grade to an F grade seems significant.
169-16	<b>TRA-4 Woodglen Vista Drive/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)</b> This section states "...prior to occupancy of the 2,212th equivalent dwelling unit, the proposed project shall install a traffic signal at this intersection and provide north-south protected phasing and east-west permissive phasing...".  What is the timing for when the 2,212th equivalent dwelling is expected to be completed prior to occupancy?
169-17	Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #4 saying Year 2035 Baseline LOS for AM equals an D grade and Year 2035 + Project LOS AM equals an F grade?
169-18	<b>TRA-5 El Nopal/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)</b> This section states "...prior to occupancy of the 1,327th equivalent dwelling unit, the proposed project shall install a traffic signal at this intersection...".  What is the timing for when the 1,327th equivalent dwelling is expected to be completed prior to occupancy?
169-19	Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #6 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade?

**169-13:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 1, states that Year 2035 Baseline level of service (LOS) for AM equals a C grade and Year 2035 + Project LOS AM equals an E grade and, if so, how dropping two grades translates into "these improvements would mitigate the impact to below a level of significance" stated at the bottom of TRA-2. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an A.

**169-14:** This comment asks when the 1,917th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,917th unit could be built 6–7 years after construction begins.

**169-15:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 3, says Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals an F grade and, if so, how this translates into "implementation of these improvements would mitigate the impact to below a level of significance" since going from a C grade to an F grade seems significant. Table 4.16-17 shows the project

impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an A.

- 169-16:** This comment asks when the 2,212th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,212th unit could be built 7–8 years after construction begins.
- 169-17:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 4, says Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be a B.
- 169-18:** This comment asks when the 1,327th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,327th unit could be built 4–5 years after construction begins.



**169-19:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 6, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be a B.

169-20	<p><b>TRA-6: El Nopal/Los Ranchitos Road Intersection (Direct and Year 2035 Cumulative)</b>          This section states, "...prior to occupancy of the 2,654th equivalent dwelling unit, the project shall restripe the westbound approach at this intersection ...".</p> <p>What is the timing for when the 2,654th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-21	<p>TRA-6 states, " this intersection is located within the County of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be considered significant and unavoidable."</p> <p>Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #8 saying Year 2035 Baseline LOS for AM equals an C grade and Year 2035 + Project LOS AM equals an D grade?</p>
169-22	<p>Is there anything the City of Santee of Santee can do to ensure the construction of the recommended improvements with or without the Fanita Ranch project?</p>
169-23	<p><b>TRA-7: Lake Canyon Road/Fanita Parkway Intersection (Direct and Year 2035 Cumulative)</b>          This section states, "...prior to occupancy of the 1,828th equivalent dwelling unit, the proposed project shall install a traffic signal at this intersection and provide northbound-southbound protected phasing...".</p> <p>What is the timing for when the 1,828th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-24	<p>Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #9 saying Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals an F grade? How does implementation of these improvements translate into mitigating the impact to below a level of significance when going from a C grade to an F grade?</p>
169-25	<p><b>TRA-8 Beck Drive/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)</b>          This section states, "...prior to occupancy of the 265th equivalent dwelling unit, the proposed project shall install a traffic signal and provide northbound-southbound protected phasing."</p> <p>What is the timing for when the 1,828th equivalent dwelling is expected to be completed prior to occupancy?</p>

**169-20:** This comment asks when the 2,654th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,654th unit could be built 8–10 years after construction begins.

**169-21:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 8, says Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals a D grade. Table 4.16-17 does not show the improvement in LOS due to the project mitigation. This information is included in Table 21-5 of the Transportation Impact Analysis (Appendix N).

**169-22:** This comment asks if the City of Santee can do anything to ensure the construction of the recommended improvements with or without the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements.

**169-23:** This comment asks when the 1,828th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is

dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,828th unit could be built 6–7 years after construction begins.

**169-24:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 9, says Year 2035 Baseline LOS for AM equals a C grade and Year 2035 + Project LOS AM equals an F grade and, if so, how implementation of these improvements translates into mitigating the impact to below a level of significance when going from a C grade to an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an A.

**169-25:** This comment asks when the 1,828th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,828th unit could be built 6–7 years after construction begins.

169-26	<p>Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #12 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? How does implementation of these improvements translate into mitigating the impact to below a level of significance? Is it because we are going from an F to an F? Is the City of Santee choosing to not try to improve this situation? How is this even acceptable when "mitigation efforts" are proposed?</p>
<b>TRA-9 Mast Boulevard/State Route 52 Westbound Ramps Intersection (Direct and Year 2035 Cumulative)</b>	
169-27	<p>This section states, "...prior to occupancy of the 442nd equivalent dwelling unit, the proposed project shall widen the westbound approach at the intersection to provide the following lane geometry...".</p> <p>What is the timing for when the 442nd equivalent dwelling is expected to be completed prior to occupancy?</p>
169-28	<p>Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #17 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? How does implementation of these improvements translate into mitigating the impact to below a level of significance? How is an F grade even acceptable when "mitigation efforts" are proposed? If we are going from an F grade to an F grade why even consider Fanta Ranch?</p>
169-29	<p>TRA-9 states, "...this intersection is located within the County of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be considered significant and unavoidable." Is there anything the City of Santee of Santee can do to ensure the construction of the recommended improvements with or without the Fanita Ranch project? If the City of Santee's hands are tied to ensure construction of recommended improvements why should the City of Santee even consider Fanta Ranch?</p>
<b>TRA-10 Mast Boulevard/West Hills Parkway Intersection (Direct and Year 2035 Cumulative)</b>	
169-30	<p>This section states, "prior to occupancy of the 88th equivalent dwelling unit, the proposed project shall widen the intersection to provide the following lane geometry..."</p> <p>What is the timing for when the 88th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-31	<p>Am I correct in looking at table 4.16-7 Year 2035 + Project Intersection Operations Item #18 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? How is an F grade even acceptable when "mitigation efforts" are proposed? If we are going from an F grade to an F grade why even consider Fanta Ranch?</p>

- 169-26:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 12, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade and, if so, how implementation of these improvements translates into mitigating the impact to below a level of significance. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an A.
- 169-27:** This comment asks when the 442nd equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 442th unit could be built 1–2 years after construction begins.
- 169-28:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 17, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade and, if so, how implementation of these improvements translates into mitigating the impact to below a level of significance. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an E.

- 169-29:** This comment asks if the City can do anything to ensure the construction of the recommended improvements with or without the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements.
- 169-30:** This comment asks when the 88th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 88th unit could be built 1 year after construction begins.
- 169-31:** This comment asks if Table 4.16-7, Year 2035 + Project Intersection Operations, Item 18, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade and, if so, how an F grade is acceptable when “mitigation efforts” are proposed. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an F.

169-32 TRA-10 states, "...this intersection is located within the County of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be considered significant and unavoidable." Is there anything the City of Santee of Santee can do to ensure the construction of the recommended improvements with or without the Fanita Ranch project? If the City of Santee's hands are tied to ensure construction of recommended improvements why should the City of Santee even consider Fanta Ranch?

169-33 **TRA-11: Mast Boulevard/Fanita Parkway Intersection (Direct and Year 2035 Cumulative)**  
 TRA-11 states, "...prior to occupancy of the 2,064th equivalent dwelling unit, the proposed project shall widen the intersection to provide dual southbound right-turn lanes and restripe the eastbound approach to provide dual eastbound left-turn lanes. Implementation of these improvements would mitigate the impact to below a level of significance."  
 What is the timing for when the 2,064th equivalent dwelling is expected to be completed prior to occupancy?

169-34 Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #22 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? How does implementation of these improvements translate into mitigating the impact to below a level of significance? Is it because we are going from an F to an F? Wouldn't we be going from an F to an F++ with potentially 2,000+ new residents accessing this intersection? Is the City of Santee choosing to not try to improve this situation? If we are going from an F grade to an F grade why even consider Fanta Ranch?

169-35 **TRA-12: Mast Boulevard/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)**  
 TRA-12 states, "...prior to occupancy of the 2,212th equivalent dwelling unit, the proposed project shall widen the intersection to provide the following lane geometry: southbound – 1 left lane, 2 thru lanes, 1 right lane; and eastbound – 2 left lanes, 2 thru lanes, 1 right lane. Implementation of these improvements would mitigate the impact to below a level of significance."  
 What is the timing for when the 2,212th equivalent dwelling is expected to be completed prior to occupancy?

169-36 Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #25 saying Year 2035 Baseline LOS for AM equals an E grade and Year 2035 + Project LOS AM equals an E grade? How does implementation of these improvements translate into mitigating the impact to below a level of significance? Is it because we are going

- 169-32:** This comment asks if the City can do anything to ensure the construction of the recommended improvements with or without the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements.
- 169-33:** This comment asks when the 2,064th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,064th unit could be built 7–8 years after construction begins.
- 169-34:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 22, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade and, if so, how implementation of these improvements translates into mitigating the impact to below a level of significance. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an E.

- 169-35:** This comment asks when the 2,212th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,212th unit could be built 7–9 years after construction begins.
- 169-36:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 25, says Year 2035 Baseline LOS for AM equals an E grade and Year 2035 + Project LOS AM equals an E grade and, if so, how implementation of these improvements translates into mitigating the impact to below a level of significance. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be a D.

169-36	from an E to an E? Wouldn't we be going from an E grade to an F grade with potentially 2,000+ new residents accessing this intersection?
169-37	<p><b>TRA-13: Riverford Road/State Route 67 Southbound Ramps Intersection (Direct and Year 2035 Cumulative)</b>          TRA-12 states, "<i>prior to the occupancy of the 442nd equivalent dwelling unit, the proposed project shall install a traffic signal at this intersection...</i>"</p> <p>What is the timing for when the 442nd equivalent dwelling is expected to be completed prior to occupancy?</p>
169-38	Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #15 saying Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals an D grade?
169-39	<p>TRA-13 states, "<i>...since this intersection is located within the County of San Diego's jurisdiction, and the California Department of Transportation's jurisdictions, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be considered significant and unavoidable.</i>" Is there anything the City of Santee can do to ensure the construction of the recommended improvements with or without the Fanita Ranch project? If the City of Santee's hands are tied to ensure construction of recommended improvements why should the City of Santee even consider Fanta Ranch?</p> <p><b>TRA-14: Riverford Road/Woodside Avenue Intersection (Direct and Year 2035 Cumulative)</b>          TRA-14 states, "<i>...prior to occupancy of the 442nd equivalent dwelling unit, the proposed project shall restripe the westbound approach to provide the following lane geometry: 1 thru lane, 1 right lane.</i>"</p> <p>What is the timing for when the 442nd equivalent dwelling is expected to be completed prior to occupancy?</p>
169-41	Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #39 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade?
169-42	<p>TRA-14 states, "<i>... since this intersection is within the County of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be considered significant and unavoidable.</i>" Is there anything the City of Santee can do to ensure the construction of the recommended improvements with or without the Fanita Ranch project? Is this intersection at risk of going from an F to an F+++ as a result of all of the new residents at the project? If the City of Santee's hands are tied to ensure construction of recommended improvements why should the City of Santee even consider Fanta Ranch?</p>

- 169-37:** This comment asks when the 442nd equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 442th unit would be built 1–2 years after construction begins.
- 169-38:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 15, says Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals a D grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. However, this intersection would not be significantly impacted by the proposed project, and no mitigation would be required.
- 169-39:** This comment asks if the City can do anything to ensure the construction of the recommended improvements with or without the proposed project. It also asks, if the City cannot ensure construction of recommended improvements, if the City should consider the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City



is without jurisdiction to ensure the construction of the recommended improvements.

- I69-40:** This comment asks when the 442nd equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 442th unit could be built 1–2 years after construction begins.
- I69-41:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 39, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be a D.
- I69-42:** This comment asks if the City can do anything to ensure the construction of the recommended improvements with or without the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements.

169-43	<p><b>TRA-15 West Hills Parkway/Mission Gorge Road Intersection (Year 2035 Cumulative)</b>          TRA-15 states, "... prior to occupancy of the 237th equivalent dwelling unit, the proposed project shall contribute an 18.5 percent fair share toward restriping the intersection to provide the following lane geometry: westbound – <u>1 left lane, 1 thru lane, 1 shared thru lane/right lane, 1 right lane</u>, consistent with the improvements proposed in the Santee General Plan Mobility Element."</p> <p>What is the timing for when the 237th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-44	<p>Why can't I find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations? It would be helpful to understand baseline and projections, especially with the size of this proposed project.</p>
169-45	<p>Another concern is this improvement is not currently identified in the City of Santee Proposed Capital Improvement Program Five-Year Budget, Fiscal Year 2017–2018 through Fiscal Year 2021–2022. With the pandemic in 2020 reducing funding to the City is it prudent to even consider this project?</p>
169-46	<p><b>TRA-16 Mission Gorge Road/Carlton Hills Boulevard Intersection (Direct and Year 2035 Cumulative)</b>          TRA-16 states, "...prior to occupancy of the 560th equivalent dwelling unit, the proposed project shall install an Adaptive Traffic Signal Control system along Mission Gorge Road between Fanita Drive and Town Center Parkway. Adaptive Traffic Signal Control is a traffic management strategy in which traffic signal timing changes, or adapts, based on actual traffic demand..."</p> <p>What is the timing for when the 560th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-47	<p>Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #45 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? TRA-16 states, "... implementation of Adaptive Traffic Signal Control along Mission Gorge Road would not reduce impacts at this intersection to below significant levels. Therefore, this impact would be significant and unavoidable." Is this intersection at risk of going from an F to an F+++ as a result of all of the new residents at the project? Is the City of Santee choosing to not try to improve this situation? If we are going from an F grade to an F grade why even consider Fanta Ranch?</p>

- 169-43:** The comment asks when the 237th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 237th unit could be built 1 year after construction begins.
- 169-44:** This comment asks for the location of the intersection in Table 4.16-17, Year 2035 + Project Intersection Operations. This intersection (No. 40) is at Mission Gorge Road and West Hills Parkway and is shown in Table 4.16-17.
- 169-45:** The comment states that the improvements to the West Hills Parkway/Mission Gorge Road intersection described in Mitigation Measure TRA-15 are not in the City's Capital Improvement Program and asks if it is prudent to consider the proposed project with the COVID-19 pandemic in 2020 reducing funding to the City. The restriping of this intersection required by Mitigation Measure TRA-15 is a relatively minor improvement that does not meet the cost threshold for inclusion in the Capital Improvement Program. Because the proposed project would contribute to the impact to this intersection in 2035, the applicant would be required to contribute 18.5 percent fair share toward the restriping of this intersection when it is required to be in place. As further required by Mitigation Measure TRA-15, "the

applicant shall coordinate with the City to initiate a capital improvement program” for the proposed project and future development to pay into. The comment regarding reduced funding to the City due to the COVID-19 pandemic in 2020 is an opinion and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR.

- 169-46:** The comment asks when the 560th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 560th unit could be built 2–3 years after construction begins.
- 169-47:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 45, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this intersection would be an F.

169-48	<p><b>TRA-17 Mission Gorge Road/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)</b>          TRA-17 states, "...prior to occupancy of the 2,123rd equivalent dwelling unit, the proposed project shall widen the intersection to provide a dedicated northbound right-turn lane consistent with the improvements proposed in the Santee General Plan Mobility Element..."</p> <p>What is the timing for when the 2,123rd equivalent dwelling is expected to be completed prior to occupancy?</p>
169-49	<p>Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #47 saying Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals a D grade?</p>
169-50	<p>Another concern is this improvement is not currently identified in the City of Santee Proposed Capital Improvement Program Five-Year Budget, Fiscal Year 2017–2018 through Fiscal Year 2021–2022. With the pandemic in 2020 reducing funding to the City is it prudent to even consider this project?</p>
169-51	<p><b>TRA-18 Buena Vista Avenue/Cuyamaca Street Intersection (Direct and Year 2035 Cumulative)</b>          TRA-18 states: "... prior to occupancy of the 206th equivalent dwelling unit, the proposed project shall restripe the westbound approach to provide the following lane geometry: westbound – 1 left lane, 1 shared left lane/thru lane/right lane..."</p> <p>What is the timing for when the 206th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-52	<p>Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #55 saying Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals a D grade?</p>
169-53	<p><b>TRA-19 El Nopal: Magnolia Avenue to Los Ranchitos Road (Year 2035 Cumulative)</b>          TRA-19 states, "...this segment of El Nopal is currently built to its ultimate Santee General Plan Mobility Element classification. Widening along this roadway would be infeasible given the lack of available right-of-way and residential driveways that front this segment. However, "spot" improvements shall be implemented prior to occupancy of the 224th equivalent dwelling unit..."</p> <p>What is the timing for when the 224th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-54	<p>TRA-19 further states, "...However, even with the identified "spot" improvements, this impact would be significant and unavoidable." Can I not find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations because this intersection is built out? Seeing the impact would be significant and unavoidable is alarming. It would have</p>

- 169-48:** This comment asks when the 2,123rd equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,123th unit could be built 7–8 years after construction begins.
- 169-49:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 47 says Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals a D grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. However, the proposed project would not significantly impact this intersection in the AM and mitigation would not be required.
- 169-50:** This comment states that this improvement is not currently identified in the City’s Proposed Capital Improvement Program Five-Year Budget, Fiscal Year 2017–2018 through Fiscal Year 2021–2022, and asks if it is prudent for the City to consider the proposed project with the current COVID-19 pandemic reducing funding to the City. The proposed project is responsible for 100 percent of this improvement. The City would have no responsibility.

- I69-51:** This comment asks when the 206th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 206th unit could be built 1 year after construction begins.
- I69-52:** This comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 55, says Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals a D grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. However, the proposed project would not significantly impact this intersection in the AM, and mitigation would not be required.
- I69-53:** This comment asks when the 224th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 224th unit could be built 1 year after construction begins.
- I69-54:** The comment states that they cannot find the intersection mentioned in Mitigation Measure TRA-19 in Table 4.16-17, Year 2035 + Project Intersection Operations,

169-54 cont.	<p>been helpful to gauge the LOS grade this intersection currently has and one can extrapolate it will get worse with 2,000+ new residents.</p> <p><b>TRA-20 El Nopal: Los Ranchitos to Riverford Road (Direct and Year 2035 Cumulative)</b>          TRA-20 states, as in TRA-19 "... <i>This segment of El Nopal is in the County of San Diego and is currently built to its ultimate Mobility Element classification...</i>".</p> <p>Can I not find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations because this intersection is built out? It would be helpful to understand baseline and projections, especially with the size of this proposed project and these streets being a main source of traffic to the proposed project during construction and for existing residents of Santee before the 2,000+ new residents.</p>
169-55	<p>TRA-20 further states, "... <i>since this segment is located within the County of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be significant and unavoidable.</i>"</p> <p>TRA-20 mentions possible improvements to congestion via a cumulative development (Parkside, formerly Hillside Meadows) in the County of San Diego that proposes to construct a parallel route to Riverford Road, Hillside Meadows Drive, that would intersect El Nopal and connect to Mast Boulevard in the south. However there are too many unknowns about the reality of this other private development project.</p> <p>Is there anything the City of Santee of Santee can do to ensure the construction of the recommended improvements?</p>
169-56	<p><b>TRA-21 Mast Boulevard: State Route 52 to West Hills Parkway (Direct)</b>          TRA 21 states, "... <i>prior to occupancy of the 1,917th equivalent dwelling unit to improve the access to State Route 52 westbound by providing one shared thru lane/right lane and dual right lanes would mitigate the impact along this segment ...</i>"</p> <p>What is the timing for when the 1,917th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-57	<p>Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #17 saying Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade? Aren't we looking at going from an F grade to F+++ grade since TRA-21 further states, "... <i>since this segment is located within the City of San Diego's jurisdiction, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would be significant and unavoidable...</i>".</p>
169-58	<p>Is there anything the City of Santee of Santee can do to ensure the construction of the recommended improvements? If the City of Santee's hands are tied to ensure</p>

because it is built out. Mitigation Measure TRA-19 addresses El Nopal: Magnolia Avenue to Los Ranchitos Road (No. 5), which is a street segment, and is contained in Table 4.16-18. The current LOS on this segment can be found in Table 4.16-12.

**169-55:** The comment states that the commenter cannot find the intersection mentioned in Mitigation Measure TRA-20 in Table 4.16-17 Year 2035 + Project Intersection Operations. It also asks if the City can do anything to ensure the construction of the recommended improvements. Mitigation Measure TRA-20 addresses El Nopal: Los Ranchitos to Riverford Road (No. 5), which is a street segment, and is contained in Table 4.16-18. The current LOS on this segment can be found in Table 4.16-12. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements. The language in Mitigation Measure TRA-20 states the mitigation cannot be assured, and therefore, the impact would be significant and unavoidable.

**169-56:** The comment asks when the 1,917th equivalent dwelling is expected to be completed prior to occupancy. The

number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,917th unit could be built 6–7 years after construction begins.

- 169-57:** The comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 17, says Year 2035 Baseline LOS for AM equals an F grade and Year 2035 + Project LOS AM equals an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied.
- 169-58:** The comment asks if the City can do anything to ensure the construction of the recommended improvements and, if the City cannot ensure construction of recommended improvements, if the City should consider the proposed project. The City imposes conditions of approval that require mitigation to be implemented prior to the impact occurring. However, the improvement identified in this mitigation measure is within the jurisdiction of another agency, not the City, and the City is without jurisdiction to ensure the construction of the recommended improvements.

169-58 cont.	<p>construction of recommended improvements why should the City of Santee even consider Fanta Ranch?</p>
169-59	<p><b>TRA-22 Carlton Oaks Drive: Fanita Parkway to Carlton Hills Boulevard (Direct and Year 2035 Cumulative)</b>          TRA-22 states, "This segment of Carlton Oaks Drive is currently built to its ultimate Santee General Plan Mobility Element classification and extends to the limits of the existing right-of-way...prior to occupancy of the 1,843rd equivalent dwelling unit, sidewalks or bicycle facilities would need to be removed or reduced in width, which would result in impacts to non-vehicular modes of travel (pedestrians and bicyclists)..."          TRA-22 basically describes how there are not any reasonable or feasible ways to mitigate and the impact to the roadway would remain significant and unavoidable.</p> <p>What is the timing for when the 1,843rd equivalent dwelling is expected to be completed prior to occupancy?</p>
169-60	<p>Why can't I find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations? It would be helpful to understand baseline and projections, especially with the size of this proposed project and these streets being a main source of traffic to the proposed project during construction and for existing residents of Santee before the 2,000+ new residents.</p>
169-61	<p><b>TRA-23 Fanita Parkway: Ganley Road to Lake Canyon Road (Direct and Year 2035 Cumulative)</b>          TRA-23 states, "...prior to occupancy of the 1,485th equivalent dwelling unit, the proposed project shall widen this segment of Fanita Parkway to a three-lane parkway with a raised median with one northbound lane and two southbound lanes..."</p> <p>What is the timing for when the 1,485th equivalent dwelling is expected to be completed prior to occupancy?</p>
169-62	<p>TRA-23 further states, "...Nonetheless, in the abundance of caution, a monitoring program consistent with Section 21.3.2, Fanita Parkway Monitoring Program, in the Traffic Impact Analysis, shall be established to Section 4.16: Transportation Draft Revised EIR 4.16-97 May 2020 Fanita Ranch Project identify the need for a fourth lane along this segment should certain traffic thresholds be met..." Why not if the City of Santee approves the project require that the fourth lane be built in advance of the monitoring since common sense would dictate it will be needed?</p>
169-63	<p><b>TRA-24 Fanita Parkway: Lake Canyon Road to Mast Boulevard (Direct and Year 2035 Cumulative)</b>          TRA-24 states, "...prior to occupancy of the 1,264th equivalent dwelling unit, the proposed project shall widen this section of Fanita Parkway as a four-lane parkway..."</p> <p>What is the timing for when the 1,264th equivalent dwelling is expected to be completed prior to occupancy?</p>

**169-59:** The comment asks when the 1,843rd equivalent dwelling is expected to be completed prior to occupancy. The amount of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,843th unit could be built 6–7 years after construction begins.

**169-60:** The comment asks why the commenter cannot find the intersection addressed by Mitigation Measure TRA-22 in Table 4.16-17, Year 2035 + Project Intersection Operations. Mitigation Measure. TRA-22 (Carlton Oaks Drive) provides mitigation for Carlton Oaks Drive: Fanita Parkway to Carlton Hills Boulevard (No. 16), which is a street segment, and is analyzed in Table 4.16-18. The current LOS on this segment can be found in Table 4.16-12.

**169-61:** The comment asks when the 1,485th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,485th unit could be built 5–6 years after construction begins.

**169-62:** The comment asks why a fourth lane would not be required to be built in advance of monitoring if the City approves the proposed project. The analysis shows that the fourth lane would not be needed on Fanita Parkway



to mitigate an impact. However, to be conservative, the monitoring program was recommended.

- 169-63:** The comment asks when the 1,264th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,264th unit could be built 4–5 years after construction begins.

- 169-64 Why can't I find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations? It would be helpful to understand baseline and projections, especially with the size of this proposed project and these streets being a main source of traffic to the proposed project during construction and for existing residents of Santee before the 2,000+ new residents.
- 169-65 **TRA-25 Cuyamaca Street: Woodglen Vista Drive to El Nopal (Year 2035 Cumulative)**  
 TRA-25 states, "Prior to occupancy of the 155th equivalent dwelling unit, the proposed project shall improve this street segment to its ultimate Santee General Plan Mobility Element classification of a four-lane major street. Implementation of these improvements would mitigate the impact to below a level of significance."  
 What is the timing for when the 155th equivalent dwelling is expected to be completed prior to occupancy?
- 169-66 Am I correct in looking at table 4.16-17 Year 2035 + Project Intersection Operations Item #4 saying Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals an F grade? How does the proposed improvements mitigate the impact to below a level of significance when going from a D grade to an F grade?
- 169-67 **TRA-26 Cuyamaca Street: El Nopal to Mast Boulevard (Direct and Year 2035 Cumulative)**  
 TRA-26 state, "Prior to occupancy of the 1,481st equivalent dwelling unit, the proposed project shall reconstruct the median and restripe Cuyamaca Street from El Nopal to Mast Boulevard to four-lane major street standards consistent with the Santee General Plan Mobility Element. Implementation of these improvements would mitigate the impact to below a level of significance."  
 What is the timing for when the 1,481st equivalent dwelling is expected to be completed prior to occupancy?
- 169-68 Why can't I find this intersection in table 4.16-17 Year 2035 + Project Intersection Operations? It would be helpful to understand baseline and projections, especially with the size of this proposed project and these streets being a main source of traffic to the proposed project during construction and for existing residents of Santee before the 2,000+ new residents.
- 169-69 **SRA-27 Cuyamaca Street: Mission Gorge Road to State Route 52 Ramps (Direct and Year 2035 Cumulative)**  
 SRA-27 states, "...prior to occupancy of the 2,650th residential unit would mitigate this segment impact by improving traffic flow at Section 4.16: Transportation Draft Revised EIR 4.16-98 May 2020 Fanita Ranch Project the key signalized intersections along the segment."

- 169-64:** The comment asks why the commenter cannot find the intersection addressed by Mitigation Measure TRA-24 in Table 4.16-17, Year 2035 + Project Intersection Operations. Mitigation Measure TRA-24 addresses Fanita Parkway: Lake Canyon Road to Mast Boulevard (No. 31), which is a street segment, and is analyzed in Table 4.16-18. The current LOS on this segment can be found in Table 4.16-12.
- 169-65:** The comment asks when the 155th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 155th unit could be built 1 year after construction begins.
- 169-66:** The comment asks if Table 4.16-17, Year 2035 + Project Intersection Operations, Item 4, says Year 2035 Baseline LOS for AM equals a D grade and Year 2035 + Project LOS AM equals an F grade, and how the proposed improvements would mitigate the impact to below a level of significance when the LOS is going from a D grade to an F grade. Table 4.16-17 shows the project impact before mitigation. Table 21-5 of the Transportation Impact Analysis (Appendix N) shows the improvement in LOS after project mitigation is applied. The mitigated LOS for this segment would be a B.

- 169-67:** The comment asks when the 1,481st equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 1,481th unit could be built 5–6 years after construction begins.
- 169-68:** The comment asks why the commenter cannot find the intersection addressed by Mitigation Measure TRA-26 in Table 4.16-17, Year 2035 + Project Intersection Operations. Mitigation Measure TRA-26 addresses Cuyamaca Street: El Nopal to Mast Boulevard (No. 46), which is a street segment, and is analyzed in Table 4.16-18. The current LOS on this segment can be found in Table 4.16-12.
- 169-69:** The comment asks when the 2,650th equivalent dwelling is expected to be completed prior to occupancy. The number of units that would be constructed each year is dependent on market conditions. At this time, about 250–300 units per year could be built, which means the 2,650th unit could be built 8–12 years after construction begins.

169-69 cont.	<p>What is the timing for when the 2,650th equivalent dwelling is expected to be completed prior to occupancy?</p> <p><b>4.16-84 Construction Impacts</b>  <i>This section states, "The proposed project is anticipated to be constructed over a 10- to 15-year timeframe beginning in 2021." It also says: "The proposed project would be developed in four construction phases."</i></p>
169-70	<p>TRA-2 through TRA-27 contemplates improvements in advance of occupancy up to a certain threshold. Figure 3-17 does not reflect a placeholder for timing of residential units for phasing. How does the phasing break out the timing of residential units for each phase? The EIR also mentions phases may occur simultaneously – what happens with the traffic issues if the four phases occur simultaneously? If this project is approved by the City of Santee will the City build in controls on phasing to ensure traffic mitigation occurs first?</p> <p>Phase 1: Fanita Commons and the easterly portion of Orchard Village, off-site and onsite partial improvements to Fanita Parkway and Cuyamaca Street; sewer infrastructure through the Phase 2 area and water infrastructure in the Special Use area Section 4.16: Transportation Draft Revised EIR 4.16-85 May 2020 Fanita Ranch Project. What is the project schedule timeline for Phase 1?</p>
169-71	<p>Phase 2: Westerly portion of Orchard Village and dead-end street improvements. What is the project schedule timeline for Phase 2?</p> <p>Phase 3: Connections to and construction of the southerly half of Vineyard Village and water treatment infrastructure through the Phase 4 area, and off-site partial improvements to Magnolia Avenue. What is the project schedule timeline for Phase 3?</p> <p>Phase 4: Northerly half of Vineyard Village Haul trucks used for site preparation and grading activities would operate on site only and not result in new trips to the City roadway network; therefore, they are not included in the trip generation calculations. What is the project schedule timeline for Phase 4?</p>
169-72	<p>I found this EIR to be intentionally designed to not be straight forward or easy to navigate for regular folks. My biggest concern is traffic, but I tried to see if the project could potentially cause an increased risk in asthma amongst residents and was not able to poke and prod and find an answer to that question. Is there a potential increased risk of asthma to residents of Santee if the City of Santee approves Fanta Ranch? If yes, will there be actual steps to mitigate the asthma risk to a negligible amount?</p>
169-73	<p>If the City of Santee decides to approve Fanta Ranch, I would also like to know what mechanisms will be in place, to require that the developer has the funding in place for the proposed mitigation efforts and the project build out to ensure that the developer does not run out of money and leaves behind a mess.</p>

- 169-70:** The comment asks what happens when traffic issues from all four phases occur simultaneously and, if the City approves the proposed project, how the City would build in controls on phasing to ensure traffic mitigation occurs first. The standard practice to ensure transportation improvements are implemented at the time of need is to attach an equivalent dwelling unit to each measure. In this way, if the phases occurred sooner or later, or overlapped, the mitigation measures would still be implemented at the time of need.
- 169-71:** This comment summarizes the project phasing as outlined in Section 4.16, Transportation, and inquires what the project schedule timeline is for each of the four phases. Section 3.11, Project Description, Conceptual Phasing Plan, describes the conceptual phasing timeline for the proposed project. Each phase would take approximately 2 to 4 years to complete. Construction is anticipated to begin in summer 2021 with a buildout of approximately 10 to 15 years.
- 169-72:** This comment inquires if there is a potential increased risk of asthma to City residents if the proposed project is approved and what the actual steps to mitigate the asthma risk would be. Section 4.2.5.3, Air Quality, Threshold 3: Sensitive Receptors, details the results of a Health Risk Assessment (Appendix C2) completed for the proposed project, which analyzed the risk of health

problems from exposure to toxic air contaminants during construction to future residents within the proposed project and impact of the proposed project to existing City residents. The study found the maximum increases in non-cancer risk would be below the significance threshold, and impacts would be less than significant. In addition, under Threshold 3, the section titled Assessment of Project Operational Impacts discusses the potential health effects as a result of the operation of the proposed project and further explains in detail why it is not feasible to provide such a meaningful assessment of potential health impacts from operational emissions.

- I69-73:** This comment asks what mechanisms are in place to require the developer to have the funding for proposed mitigation. Mitigation measures will be fully funded by the applicant or the proposed project's homeowners association. The Development Agreement between the current applicant and City will address the completion of public improvements. The Mitigation Monitoring and Reporting Program (CEQA Guidelines, Section 15097; California Public Resources Code, Section 21083) and Conditions of Approval are legally binding documents to assure that all improvements are implemented in accordance with the triggers contained in the mitigation measures or the conditions, respectively. HomeFed will be required to enter into Subdivision Improvement Agreements with the City for all of the required public

improvements. The agreements will be secured by acceptable securities provided by HomeFed to assure the completion of the improvements. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

169-74

I look forward to your answers to my questions in this letter. I do not see how the proposed Fanta Ranch will improve the quality of life for residents of the City of Santee.

I implore the City of Santee to not make a unilateral decision to approve Fanta Ranch and that the City of Santee will require residents to vote to approve or not approve this project.

Kind regards,

*Mary E. Hyder*

Mary Hyder  
375 Whispering Willow Dr. Unit D  
Santee, CA 92071

[mehyder@cox.net](mailto:mehyder@cox.net)

**169-74:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I70: Shauna Johnson, July 10, 2020

I70

**I70-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Shauna Johnson <sjohnson@silverstrand.com>  
**Sent:** Friday, July 10, 2020 2:18 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I70-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Shauna Johnson  
9059 Hightail Dr  
Santee, CA 92071  
sjohnson@silverstrand.com

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## Comment Letter I71: Terry Johnson, July 10, 2020

I71

**I71-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Terry Johnson <user@votervoices.net>  
**Sent:** Friday, July 10, 2020 7:07 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I71-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Terry Johnson  
10140 El Nopal  
Santee, CA 92071  
tjteach@cox.net

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## Comment Letter I72: James Kerns, July 10, 2020

I72

**I72-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** James Kerns <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 12:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I DO AGREE WITH THE FANITA RANCH EIR. THIS PROJECT WILL BRING ALOT OF PLUSES TO THE CITY

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I72-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

James Kerns  
10205 Prince Jed Ct  
Santee, CA 92071  
chejk1252@cox.net

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## Comment Letter I73: Kathleen Kuklinski, July 10, 2020

I73

**I73-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Kathleen Kuklinski <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 12:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

My husband and I are looking forward to seeing the final plans of this project. We are hopeful that as we downsize in the very near future that this community plan would be perfect for us. We would be moving from a large home that we have had added all new amenities to, such as solar, updated heat and air, roof, etc. and want to move into a new home with the same or similar amenities, rather than an older home that will need considerable of updating to maintain our current lifestyle. We will be able to reduce the amount of time on the road; now we go into a very busy Santee Town Center to do our shopping. We are looking forward to be able to eat at local restaurants, and enjoy all the other great amenities that will be included in this area, possibly by walking or not driving very far.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I73-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Kathleen Kuklinski  
2434 Windmill View Rd  
El Cajon, CA 92020  
kskuklinski@cox.net

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## Comment Letter I74: Lorri Langmaid, July 10, 2020

I74

**I74-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Lorri Langmaid <user@voterveoice.net>  
**Sent:** Friday, July 10, 2020 10:02 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

With all the building that was been going on I don't understand why this project is having so much resistance. I have read the info and watched the video's. This project sounds like a wonderful place that would benefit ALL of Santee. Thank you

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I74-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Lorri Langmaid  
9518 Nicole Way  
Santee, CA 92071  
lolyla1@cox.net

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## Comment Letter I75: Jeffrey Mair, July 10, 2020

**I75**

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**From:** Jeffrey Mair <jeffal621@gmail.com>  
**Sent:** Friday, July 10, 2020 6:55 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Santee needs Fanita Ranch! The community and families will benefit Greatly!

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

**I75-1**

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jeffrey Mair  
2950 Vine Ct  
El Centro, CA 92243  
jeffal621@gmail.com

**I75-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I76: Jeffrey Mair, July 10, 2020

I76

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**From:** Jeffrey Mair <jeffal621@gmail.com>  
**Sent:** Friday, July 10, 2020 5:45 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I76-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jeffrey Mair  
2950 Vine Ct  
El Centro, CA 92243  
jeffal621@gmail.com

**I76-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I77: Jon Major, July 10, 2020

**I77**

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**From:** Jon Major <jonmajor2000@yahoo.com>  
**Sent:** Saturday, July 11, 2020 7:24 AM  
**To:** Chris Jacobs  
**Subject:** Danita ranch

177-1 | Please, please don't allow any more urban encroachment. The traffic in the county is horrible and the mitigation is minimal. The current residents have a right to expect that their neighborhood will not significantly change. This is a huge change for the worse. The virus and unrest this year should be taken as a warning. Dense populations are a liability. Thank you.

[Sent from Yahoo Mail on Android](#)

**I77-1:** This comment states that the traffic in the County of San Diego is horrible and that the mitigation is minimal. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

This comment also states that current residents should expect that their neighborhoods will not change and that the COVID-19 pandemic and unrest this year should be taken as a warning. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I78: Wayne Morton, July 10, 2020

I78

**I78-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** wayne morton <user@votervoice.net>  
**Sent:** Friday, July 10, 2020 2:17 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Get Fanita ranch Built

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I78-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

wayne morton  
1025 SORRENTO DR  
SAN DIEGO, CA 92107  
waynemorton@cox.net

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## Comment Letter I79: Hellen Nguyen, July 10, 2020

I79

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**From:** Hellen Nguyen <user@voterveoice.net>  
**Sent:** Friday, July 10, 2020 4:46 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I79-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Hellen Nguyen  
8520 Boulder Way  
Santee, CA 92071  
callmespots@yahoo.com

**I79-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I80: Joseph Niezgoda, July 10, 2020

I80

**I80-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Joseph Niezgoda <user@votervoicenet>  
**Sent:** Friday, July 10, 2020 10:40 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I80-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Joseph Niezgoda  
10844 Len St  
Santee, CA 92071  
jniez-sdiego@cox.net

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## Comment Letter I81: William Parish, July 10, 2020

**I81**

**I81-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** William Parish <wparish@wparish.com>  
**Sent:** Friday, July 10, 2020 6:20 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

The City of San Diego and Caltrans have failed us for decades on SR-52. I am excited to have ANY entity help work to resolve a horrid commute for those of us relegated to live in the few communities in the East that a single income family can still afford.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

**I81-1** I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

William Parish  
13228 Laurel St  
Lakeside, CA 92040  
wparish@wparish.com

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## Comment Letter I82: Gail Ramer, July 10, 2020

I82

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**From:** Gail Ramer <gail\_ramer@yahoo.com>  
**Sent:** Friday, July 10, 2020 10:11 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

I82-1 I am writing with my support for the Fanita Ranch DEIR. Our city needs this project to offer move-up housing as well as multi-family housing in order to alleviate the housing crisis.  
I am tired of the narrative that it has been defeated by the voters every time when that is completely false. In 2005, Prop X was defeated by an overwhelming majority. I am a 30 year resident and am tired of the vocal minority distorting the facts.

Gail Ramer  
10187 Little Leaf Ln  
Santee, CA 92071

Sent from my iPhone

**I82-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I83: Michael Ranson, July 10, 2020

July 10, 2020

To: Chris Jacobs, Principal Planner

Subject: Fanita Revised Draft EIR

Department of Development Services

City Hall, Building 4

10601 Magnolia Avenue

Santee, California 92071

Email: cjacobs@cityofsanteeca.gov

Mr. Jacobs,

"CEQA is intended to protect the existing environment from impacts that would result from the proposed project." DEIR pg 4.12-24

I am in support of the Fanita Ranch project and believe that the negative impact on my own personal environment can and should be mitigated to protect my quality of life. Upon approval of the project I am counting on HomeFed to continue doing what they have done for years. Community outreach, working with homeowners directly impacted and listening to our community. I am counting on them following through with promised traffic improvements, the 35 miles of added trails, the community farm and the many other amenities proposed so that Fanita Ranch can grow into a positive addition to our big city with a small town feel. It is my opinion that Santee has the most potential of any area in the East County and much of that potential hinges on HomeFed's Fanita Ranch project. Approval and proper implementation of the project will allow Santee to move forward in future housing needs, necessary financial revenue and badly needed traffic solutions.

**NOISE IS REALITY OF PROJECT, MITIGATION IS NEEDED:** My comments are directly addressing "the existing environment" of my property that will be negatively impacted by this project unless addressed and mitigated. My property is located east of Fanita Parkway and between Ganley Road and Lake Canyon Road. My home is about midway between the cross streets and also across from Santee Lakes Campground Lake

 I83

**I83-1:** This comment provides support for the proposed project, including the proposed traffic improvements, public trails, and community Farm. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I83-2:** This comment provides an explanation of the location of the commenter's property. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

I83-1

I83-2

2/13

I83-2  
cont.

Seven. The back of my property shares a property line with the developer. Table 4.12-11 Existing + Project Traffic Noise Levels finds that there will be significant impact from noise. (See attachment T-1) Table 4.12-12 Near Term Traffic Noise Levels also finds that there will be significant impact from noise. (See attachment T-2) Table 4.12-13 Year 2035 Traffic Noise Levels also finds that there will be significant impact from noise. (See attachment T-3) Table 4.12-16 Significant Permanent Vehicle Noise Impact Summary shows a summary of findings. (See attachment T-4) I accept the reality that noise will increase with this project.

I83-3

I83-4

**SOME NOISE MITIGATION IS POSSIBLE:** The conclusion that there will be a significant negative noise impact on Fanita Parkway between Ganley Road and Lake Canyon Road is correct. However, the conclusion that this negative impact cannot be mitigated is only partially correct.

I83-5

**EXAMPLE:** Noise Receptor locations---some data in DEIR is misleading for the road section of Fanita Parkway between Ganley Road and Lake Canyon Road because the topography varies greatly along this section of Fanita Parkway. The location of Noise Receptors at Offsite Locations 1 & 2 (see Figure 5 and photos of Offsite Locations 1 & 2) recorded data at the greatest elevation change between the proposed road and the homes east of Fanita Parkway. The rise of the slope on the East side of Fanita Parkway varies greatly over the course of this road section. What is true at the selected noise receptor locations is not true over the entire section of this road.

There are some properties (mine included) where a sound barrier wall will help reduce the increased traffic noise. Therefore, the negative impact of the increased noise from this project can be mitigated for some homeowners on Fanita Parkway between Ganley Road and Lake Canyon Road. The DEIR pg 4.12-68 states that "Additional noise barriers may be feasible on Fanita Parkway...if barriers can be negotiated with private property owners to be installed at existing fence lines rather than in the roadway right-of-way."

I83-6

**WILLING TO NEGOTIATE:** I am willing to negotiate with the developer on finding a noise barrier solution that will successfully mitigate the significant negative noise impact that the Fanita Ranch project will create---quite

**I83-3:** This comment summarizes information that is provided in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, of the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I83-4:** This comment states that the conclusion in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, that potential impacts to the segment of Fanita Parkway from Ganley Road to Lake Canyon Road cannot be mitigated is only partially correct. This does not follow the EIR approach, which determines impacts that cannot be fully mitigated to below a level of significance to be significant and unavoidable. Partially mitigating an impact, such as noise, through all feasible measures is required under CEQA; however, if those measures would not fully reduce the impact, then the conclusion would still be significant and unavoidable. This comment provides an introduction to subsequent comments that provide the commenter's basis for this statement. Please refer to responses I83-5 through I83-8.

**I83-5:** This comment states that some data in Section 4.12.5.1, Threshold 1: Exceedance of Noise Standards, is misleading because conditions, specifically topography, vary between receptors on the eastern side of Fanita Parkway. The commenter references noise measurement locations provided in Table 4.12-3, Ambient Sound Level

Measurements (dBA). Data recorded at these locations was used to establish the baseline noise environment but was not included in vehicle noise modeling. Section 4.12.5.1, under the Operational Noise Mitigation Measures heading, includes an evaluation of the potential effectiveness of a wall on the eastern side of Fanita Parkway. As noted by the commenter, topography varies on the eastern side of Fanita Parkway. As such, portions of a noise wall on Fanita Parkway would be required at unsafe or visually incompatible heights to provide a continuous, effective noise barrier that would mitigate segment impacts to a less than significant level. Because the impact to this segment of Fanita Parkway could not be fully mitigated, a noise barrier on the eastern side of Fanita Parkway was determined to be infeasible, and the impact was determined to be significant and unavoidable. The comment also accurately states that the EIR acknowledges that additional noise barriers may be feasible on Fanita Parkway and Cuyamaca Street if barriers can be negotiated with private property owners to be installed at existing fence lines rather than in the roadway rights-of-way. However, as noted in the EIR, such agreements cannot be guaranteed at this time, and even if some property owners agree, the barriers would need to be continuous across all affected properties to be effective. Therefore, this is not considered to be a feasible mitigation measure in accordance with Section 15126.4(a)(2) of the CEQA Guidelines. This issue is adequately addressed in the EIR.

3/13

183-6 cont. literally in my own backyard. I am proposing two of my own here but I am also happy to hear additional options.

183-7 **OPTION A:** A five foot wall, placed on our shared property line, which is a combination of block and sound barrier glass. (See Attachment Images: A, B and Western View from Homeowner). This is the best and potentially most successful mitigation. "The basic rule of thumb for how tall a noise barrier should be is: the height of the barrier should be at least as tall as the line-of-sight between the noise source and the receiver, but add 30 percent." (Source <https://residential-acoustics.com/top-4-outdoor-soundproofing-mistakes/>) It is clear in the photo that from my backyard that this type of sound barrier would mitigate the additional noise created by the project. You should note that this photo was taken from a standing position. If I were sitting in this location, the break in the noise would be even higher than the 30%. It would likely be about 50% higher than our line of site (hearing). If you would like video demos of how this option would mitigate noise, please go to <https://youtu.be/lzNhxI-v5HE> and <https://youtu.be/SSea5mGalro>.

183-8 **OPTION B:** A 6' to 8' high block wall at road right of way or closer to my existing property. (Also see Attachment Images: A, B and Western View from Homeowner). Although this option is less successful at noise mitigation, it would allow me to plant shrubbery in an area that would help mitigate noise and not negatively impact my existing view.

183-9 **SHARED COST:** As I would expect with any neighbor, I do anticipate sharing some of the cost of either of these solutions. I am asking that HomeFed engage with me as my neighbor to find a mitigation measure that works for both parties and maintains my quality of life in our shared community.

I look forward to a response and I welcome any questions and dialogue.

Sincerely,



Michael Ranson

Santee Resident / Strathmore Drive

619-977-1121

**I83-6:** This comment provides an introduction to two noise barrier options that the commenter presents in comments I83-7 and I83-8. Please refer to the responses to these comments, in addition to response to comment I83-5 that describes why a noise barrier along the eastern side of Fanita Parkway is infeasible. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I83-7:** This comment includes a suggestion by the commenter to construct a noise barrier on the commenter's property, consistent with the statement in Section 4.12.5.1 under Operational Noise Mitigation Measures that noise barriers may be feasible on Fanita Parkway if barriers can be negotiated with private property owners. The commenter's willingness to negotiate is noted; however, installation of a noise barrier at one property would not sufficiently mitigate the potential impact identified along the entire eastern segment of Fanita Parkway from Ganley Road to Lake Canyon Road. As such, the commenter's Option A does not identify a new mitigation measure that would reduce an impact of the proposed project to a less than significant level, and no changes to the EIR have been made in response to this comment.

**I83-8:** This comment includes a suggestion by the commenter that a 6- to 8-foot noise wall may be constructed at the

right-of-way adjacent to the commenter's property that may provide some noise attenuation. Several cross-sections of Fanita Parkway from Ganley Road to Lake Canyon Road were considered in the Noise Technical Report (Appendix L) analysis of noise barrier feasibility on the eastern side of Fanita Parkway. The differences in elevation between the roadway right-of-way and receptor location vary from an approximately 4-foot change in elevation in the middle of the segment to an approximately 23-foot difference in elevation near Ganley Road. Taking into account distance and elevation, noise barriers ranging from 7 feet to 17 feet in height would be required to break the line of sight between the receptor and Fanita Parkway and provide a reduction in vehicle traffic noise. As noted in Section 4.12.5.1 under Operational Noise Mitigation Measures, noise walls exceeding 8 feet would be incompatible with the City's Zoning Ordinance (Santee Municipal Code, Section 13.10.050[F][2]), and noise walls up to 17 feet would be visually incompatible with the surrounding community and above the California Department of Transportation maximum noise barrier height of 14 to 16 feet. Therefore, although estimated barrier height at the rights-of-way adjacent to the commenter's property may be within compatibility standards, an effective, continuous noise barrier along the entire eastern segment of Fanita Parkway from Lake Canyon Road to Ganley Road is not feasible. Similar to the commenter's Option

A, described in response to comment I83-7, construction of a barrier outside public rights-of-way, closer to the commenter's backyard, would require negotiation with all other property owners adjacent to this segment of Fanita Parkway in order to construct an effective noise barrier. As such, the commenter's Option B does not identify a new mitigation measure that would reduce an impact of the proposed project to a less than significant level, and no changes to the EIR have been made in response to the comment.

- I83-9:** This is a closing comment and offer to negotiate with the applicant regarding noise barrier construction. Refer to responses to comments I83-7 and I83-8 regarding the commenter's mitigation suggestions. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.





183-10

Section 4.12-Noise

Harris & Associates

ATTACHMENT T-1

Table 4.12-11. Existing + Project Traffic Noise Levels

Roadway	Segment	Applicable Threshold (dBA Ldn)	Existing (dBA Ldn)	Exceeds Threshold Without Project?	Existing + Project (dBA Ldn)	Increase in Noise Level from Existing	Significant Impact?
Mist Boulevard	SR-32 to West Hills Parkway	70	71	Yes	72	+1	No
	West Hills Parkway to Medina Drive	65	70	Yes	71	+1	No
	Pebble Beach Drive to Fanita Parkway	65	70	Yes	71	+1	No
Mission Gorge Road	SR-125 to Fanita Drive	70	77	Yes	78	+1	No
	Fanita Drive to Carlton Hills Boulevard	70	77	Yes	77	0	No
Fanita Parkway	On-Site Portion to Gantry Road	65	Does Not Exist	No	66	NA	Yes
	Gantry Road to Lake Canyon Road	65	59	No	69	+10	Yes
	Lake Canyon Road to Mist Boulevard	65	61	No	70	+9	Yes
	Mist Boulevard to Carlton Oaks Drive	65	58	No	61	+3	No
	Carlton Oaks Drive to Mission Gorge Road	65	69	Yes	70	+1	No
	On-Site Portion to Magnolia Avenue	65	Does Not Exist	No	67	NA	No <sup>1</sup>
	Magnolia Avenue to Princess Joann Road	65	Does Not Exist	No	64	NA	No
	Princess Joann Road to Chaparral Drive	65	Does Not Exist	No	64	NA	No
	Chaparral Drive to Woodglen Vista Drive	65	54	No	68	+14	No <sup>2</sup>
	Woodglen Vista Drive to El Nopal	65	62	No	69	+7	No <sup>2</sup>

4/13

May 2020

4.12-53

Draft Revised EIR  
Fanita Ranch Project

**183-10:** This comment contains the attachments to the comment letter, including tables from Section 4.12, Noise, a marked-up map showing the location of the commenter's property, and marked-up maps, photo simulations and roadway cross-sections identifying the locations of the noise barrier options described in comments I83-7 and I83-8. Refer to responses to comments I83-7 and I83-8 regarding the commenter's mitigation suggestions. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



183-10  
cont.

Harris & Associates Section 4.12: Noise ATTACHMENT T-2

Table 4.12-12. Near-Term Traffic Noise Levels

Roadway	Segment	Applicable Threshold (dBA Ldn)	Near-Term No Project (dBA Ldn)	Exceeds Threshold Without Project?	Near-Term + Project (dBA Ldn)	Increase in Noise Levels from Near-Term No Project	Significant Impact?
West Boulevard	SR-52 to West Hills Parkway	70	72	Yes	73	+1	No
	West Hills Parkway to Medina Drive	65	70	Yes	72	+2	No
Mission Gorge Road	Pebble Beech Drive to Fanita Parkway	65	70	Yes	72	+2	No
	SR-125 to Fanita Drive	70	77	Yes	78	+1	No
Fanita Parkway	Fanita Drive to Carlton Hills Boulevard	70	77	Yes	78	+1	No
	On-Site Portion to Ganley Road	65	Does Not Exist	No	66	NA	Yes
Carlton Hills Boulevard	Ganley Road to Lake Canyon Road	65	60	No	70	+10	Yes
	Lake Canyon Road to West Boulevard	65	61	No	70	+9	Yes
Coyamassa Street	West Boulevard to Carlton Oaks Drive	65	59	No	62	+3	No
	Carlton Oaks Drive to Mission Gorge Road	65	66	Yes	70	+1	No
Coyamassa Street	On-Site Portion to Magnolia Avenue	65	Does Not Exist	No	67	NA	No <sup>1</sup>
	Magnolia Avenue to Princess Joann Road	65	Does Not Exist	No	64	NA	No
Coyamassa Street	Princess Joann Road to Chaparral Drive	65	Does Not Exist	No	64	NA	No
	Chaparral Drive to Woodglen Vista Drive	65	54	No	68	+14	No <sup>2</sup>
Coyamassa Street	Woodglen Vista Drive to El Nopal	65	62	No	69	+7	No <sup>2</sup>

9/13

Draft, Revised EIR  
Fanita Ranch Project  
4.12-57  
May 2020



183-10  
cont.

Section 4.12-Noise

Harris & Associates

ATTACHMENT T-3

Table 4.12-13. Year 2035 Traffic Noise Levels

Roadway	Segment	Applicable Threshold (dBA Ldn)	Year 2035 No Project (dBA Ldn)	Exceeds Threshold Without Project?	Year 2035+ Project (dBA Ldn)	Increase in Noise Level from Year 2035 No Project	Significant Impact?
Mast Boulevard	SR-52 to West Hills Parkway	70	72	Yes	72	0	No
	West Hills Parkway to Medina Drive	65	71	Yes	72	+1	No
	Pebble Beach Drive to Fanita Parkway	65	71	Yes	72	+1	No
Mission Gorge Road	SR-125 to Fanita Drive	70	78	Yes	78	0	No
	Fanita Drive to Carlton Hills Boulevard	70	77	Yes	78	+1	No
Fanita Parkway	On-Site Portion to Gantry Road	65	64	No	66	+2	Yes
	Gantry Road to Lake Canyon Road	65	65	No	70	+5	Yes
	Lake Canyon Road to Mast Boulevard	65	66	Yes	70	+4	Yes
	Mast Boulevard to Carlton Oaks Drive	65	61	No	62	+1	No
	Carlton Oaks Drive to Mission Gorge Road	65	70	Yes	70	0	No
Cuyamaca Street	On-Site Portion to Magnolia Avenue	65	65	No	67	+2	No <sup>1</sup>
	Magnolia Avenue to Princess Joann Road	65	64	No	65	+1	No
	Princess Joann Road to Chaparral Drive	65	65	No	66	+1	No <sup>2</sup>
	Chaparral Drive to Woodglen Vista Drive	65	68	Yes	69	+1	No

6/13

May 2020

4.12-59

Draft Revised EIR  
Fanita Ranch Project

7/13

ATTACHMENT T-4

**Permanent Increase in Vehicle Noise**

The proposed project would have the potential to result in significant vehicle noise impacts due to project operation. Table 4.12-16 provides a summary of the permanent vehicle impacts and where they would occur.

**Table 4.12-16. Significant Permanent Vehicle Noise Impact Summary**

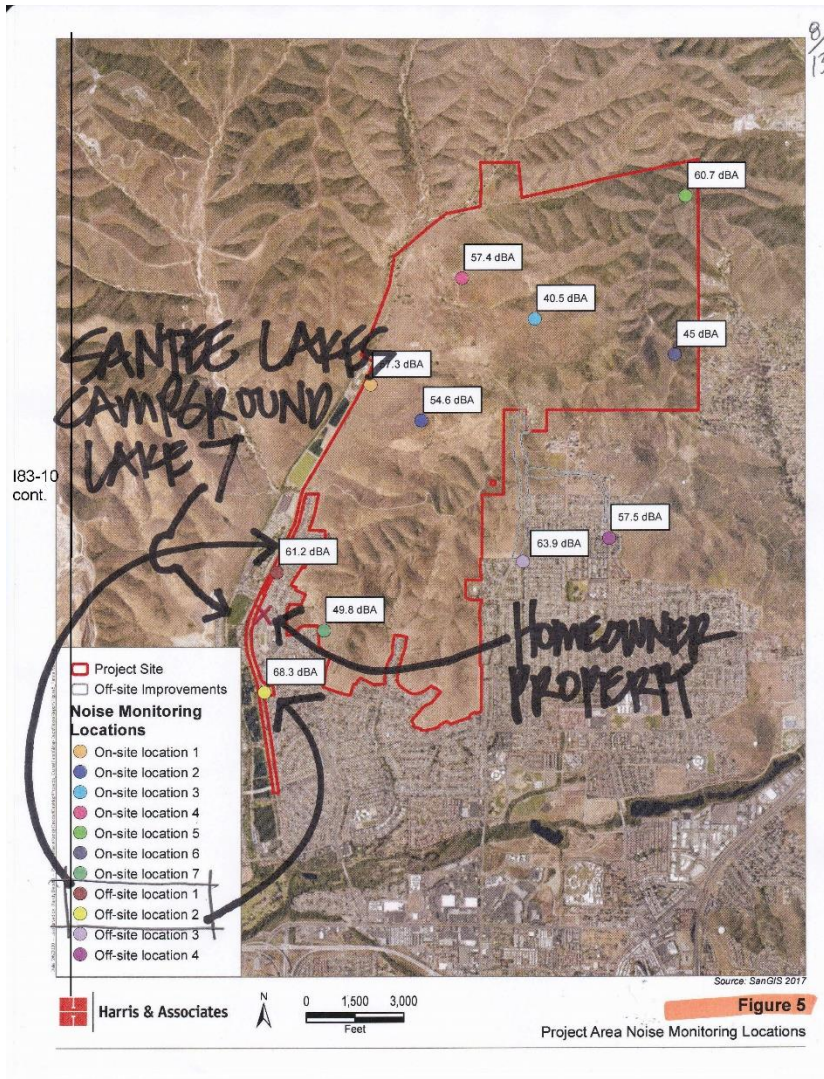
Roadway	Segment	Scenario When Impact Would Occur	Maximum Noise Level at 50 Feet (dBA Ldn)
	On-Site Portion to Ganley Road	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> <li>Year 2035 + Project</li> <li>Cumulatively Considerable</li> </ul>	66
Fanita Parkway	Ganley Road to Lake Canyon Road	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> <li>Year 2035 + Project</li> <li>Cumulatively Considerable</li> </ul>	70
	Lake Canyon Road to Mast Boulevard	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> <li>Year 2035 + Project</li> <li>Cumulatively Considerable</li> </ul>	70
Cuyamaca Street (Silver Country Estates)	El Nopal to Mast Boulevard	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> </ul>	71
Magnolia Avenue	Princess Joann Road to Woodglen Vista Drive	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> </ul>	68
	Woodglen Vista Drive to El Nopal	<ul style="list-style-type: none"> <li>Existing + Project</li> <li>Near-Term + Project</li> </ul>	69

Source: Appendix L.

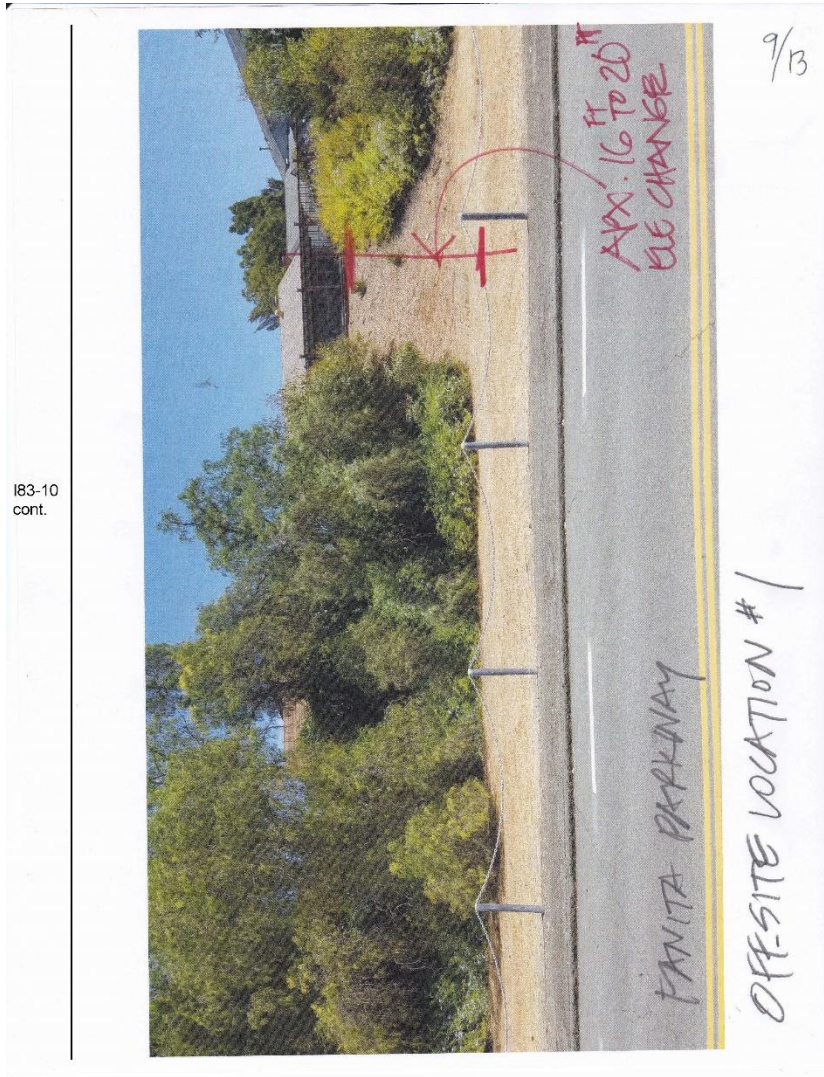
Notes: dBA = A-weighted decibel; Ldn = day-night average sound level

As shown in Table 4.12-16, vehicle noise levels on Fanita Parkway and Magnolia Avenue under all scenarios would be within the conditionally compatible noise level range of 70 dBA Ldn or below for residential development but would exceed the applicable threshold of significance of 65 dBA Ldn (the normally acceptable noise level). Noise levels on the segment of Cuyamaca Street from El Nopal to Mast Boulevard would also potentially exceed the conditionally compatible noise level range. Mitigation Measure NOI-6 requires the installation of a noise barrier on some impacted segments of Fanita Parkway, Cuyamaca Street, and Magnolia Avenue, as shown on Figure 4.12-4, Noise Mitigation Locations. Noise barriers that break the line of sight between receptors and the roadway would provide at least 5 dBA in noise reduction, and additional reductions can be achieved with additional height or material selection. Typical noise barriers constructed for the purpose of reducing vehicle noise can provide 30 dBA of noise reduction (Caltrans 2013a). Appendix L includes a sample noise barrier calculation for Fanita Parkway.

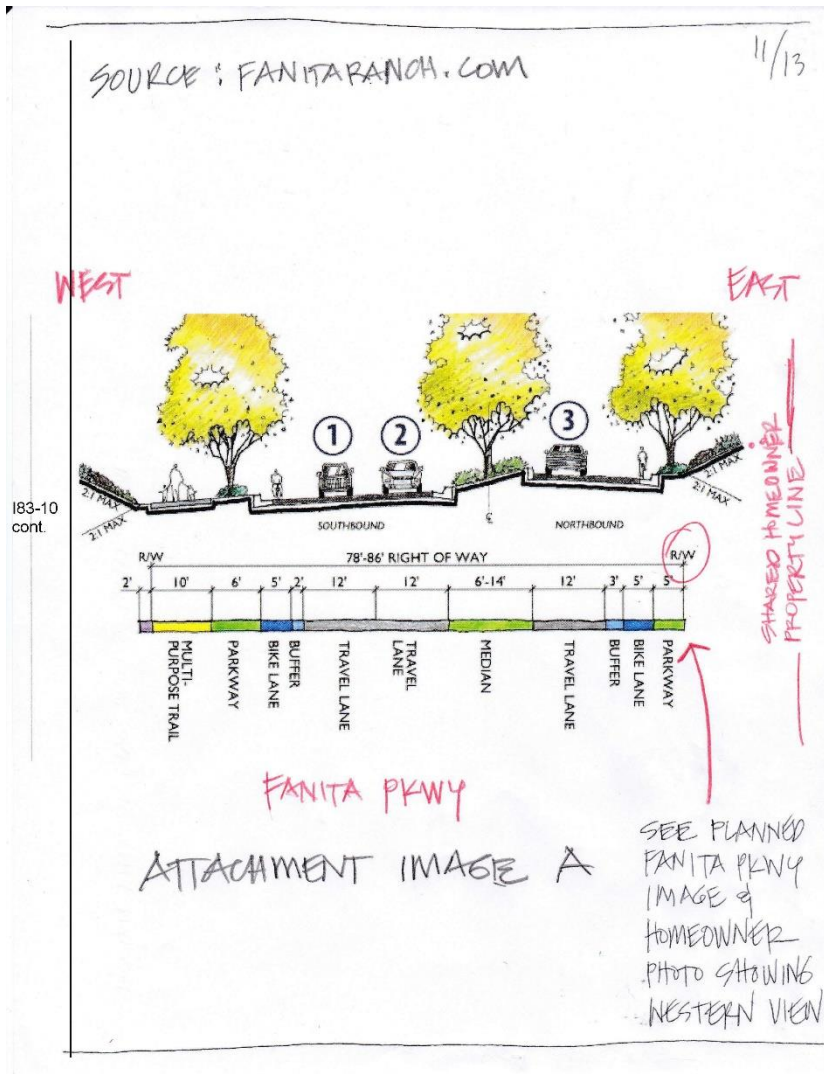
183-10 cont.



183-10  
cont.













## Comment Letter I84: Edgar Rodriguez, July 10, 2020

I84

**I84-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** Edgar Rodriguez <user@voterveoice.net>  
**Sent:** Friday, July 10, 2020 7:06 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I84-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Edgar Rodriguez  
13608 Paseo del Mar  
El Cajon, CA 92021  
erodriguez012002@yahoo.com

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## Comment Letter I85: Doug Rosaaen, July 10, 2020

I85

I85-1:

---

**From:** Doug Rosaaen <doug.rosaaen@gmail.com>  
**Sent:** Friday, July 10, 2020 12:21 PM  
**To:** Chris Jacobs  
**Subject:** DENY the Fanita Ranch EIR

Dear Principal Planner Jacobs,

\$\$Fanita\$\$Buys\$\$Santee\$\$

Add my name in OPPOSITION of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website that Fanita Ranch paid for (like they always do) to share this comment, I am only doing so because it as an easy and quick way to use their dollars in opposition to their efforts, and because there is little for me to add of substance that has not already been fully discussed in other precedence setting denials across the county.

I85-1

I strongly oppose Fanita Ranch and the "Not so" independent analysis provided in the EIR and its lackluster mitigations that fails to avoid environmental and safety impacts.

The EIR was also clear in outlining the many benefits for outsider developers.

The project will fail to improve SR-52, city streets, parks and trails, or community services. Fanita developers will avoid fees at all costs, and do anything they can to avoid paying to the city with taxes and to local schools.

The facts are clear, years of developer dollars paid to elected official reelection campaigns have made this the most paid-off conversation in San Diego County, and now it's time to finally move and cancel this project once and for all.

Please deny the Draft Revised Environmental Impact Report and deny the Fanita Ranch project once again.

Sincerely,

Doug Rosaaen  
10370 Cadwell Rd  
Santee, CA 92071  
doug.rosaaen@gmail.com

This comment states the commenter’s opposition to the proposed project. This comment also states that the proposed project will fail to improve State Route 52, City of Santee streets, parks and trails, or community services. As described in Chapter 3, Project Description, in the EIR, the proposed project would include park and trail improvements and provide an on-site fire station and land use designation for an on-site law enforcement satellite office. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. Improvements to State Route 52 are identified in Mitigation Measures TRA-29 and TRA-30. This issue is adequately addressed in the EIR.

Further, Section 4.15, Recreation, analyzes the potential impacts to parks and trails from implementation of the

proposed project and concludes that the proposed project would result in significant and unavoidable impacts to air quality, noise, and transportation after all feasible mitigation is applied. Section 4.14, Public Services, analyzes the potential impacts to public services from implementation of the proposed project and concludes less than significant impacts to fire protection services, police protection services, public school facilities, and libraries would occur. These issues are adequately addressed in the EIR.

## Comment Letter I86: Dennis Schroeder, July 10, 2020

**I86**

**I86-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Dennis Schroeder <dennis.r.schroeder@gmail.com>  
**Sent:** Friday, July 10, 2020 12:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

As a Santee resident, I look forward to Fanita Ranch finally coming to town. The EIR presented provides the best outcome for Santee.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I86-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Thank you,

Sincerely,

Dennis Schroeder  
8536 Dobyys Dr  
Santee, CA 92071  
dennis.r.schroeder@gmail.com

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## Comment Letter I87: Lorenda Seibold-Phalan, July 10, 2020

I87

**I87-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Lorenda Seibold-Phalan <user@voterveoice.net>  
**Sent:** Friday, July 10, 2020 9:32 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Dear Elected City Officials,  
Please adopt the Fanita Ranch EIR. This plan greatly reduces our carbon footprint and will be a gem in the hills of Santee. As a resident for over 30 years, I am looking forward to completion of this project.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I87-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Lorenda Seibold-Phalan  
8718 Granite House Ln  
Santee, CA 92071  
erm92071@cox.net

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## Comment Letter I88: Heather Shuck, July 10, 2020

I88

**I88-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Heather Shuck <heathshuck@gmail.com>  
**Sent:** Friday, July 10, 2020 10:01 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

We love the idea of this community and agree with the DEIR findings. Please let this happen! We need a community like this in the area.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I88-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Heather Shuck  
6372 Lake Lucerne Dr  
San Diego, CA 92119  
heathshuck@gmail.com

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## Comment Letter I89: Roger Simpson, July 10, 2020

I89

**I89-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Roger Simpson <rogersimpson196@gmail.com>  
**Sent:** Friday, July 10, 2020 2:00 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

The design of the Fanita project is an example of fine planning, engineering and environmental goals. As a retired civil engineer with an eye to benefits of good housing I wholeheartedly support this project.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I89-1

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Roger Simpson  
9229 Dunbarton Rd Apt Santee  
Santee, CA 92071  
rogersimpson196@gmail.com

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## Comment Letter I90: Jasen Torbett, July 10, 2020

I90

**I90-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Jasen Torbett <jasape@att.net>  
**Sent:** Friday, July 10, 2020 5:14 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

As a long term resident of Santee, I am looking forward to Fanita Ranch becoming a part of our great city. This project continues to be stifled by a noisy few, one who has made a career out of being a Santee development obstructionist. Please look past the noise and get this project moving. Home Fed has already proven they build great planned communities such as Escaya in Chula Vista. Let's invite a similar well thought out community into Santee. Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report.

While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I90-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jasen Torbett  
7751 Britt Pl  
Santee, CA 92071  
jasape@att.net

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## Comment Letter I91: David Weiland, July 10, 2020

I91

**I91-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Mr. & Mrs. David Weiland <dweiland16@gmail.com>  
**Sent:** Friday, July 10, 2020 6:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

East County has not had a lot of opportunity to build a master planned community. Fanita Ranch is a gold plated master planned community and the City of Santee should be very grateful of this opportunity. Please keep this project moving forward. This will be great for Santee and East County. Also, as you know, we can use the housing which we are in dire need of.

Please add my name with those in support of Fanita Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it is an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I91-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

David Weiland  
1523 Donita Dr  
El Cajon, CA 92020  
dweiland16@gmail.com

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## Comment Letter I92: Tracey Weiss, July 10, 2020

I92

**I92-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Tracey Weiss <user@voterveice.net>  
**Sent:** Friday, July 10, 2020 2:00 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

I92-1

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

On a very personal note, traffic in Santee has become a nightmare and Fanita Ranch will address this problem in a very efficient way. It should not take 25 minutes to get on the freeway when it is only 1 mile from my house.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Tracey Weiss  
7908 Rancho Fanita Dr Spc 47  
Santee, CA 92071  
snurfiles17@yahoo.com

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## Comment Letter I93: Thomas Wilke, July 10, 2020

**I93**

**I93-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Thomas Wilke <Tcwilke52@gmail.com>  
**Sent:** Friday, July 10, 2020 9:32 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

My wife and I are looking forward in spending our remaining retirement years at Fanita Ranch. Your support would go a long way on seeing this happen.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

**I93-1**

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Thomas Wilke  
253 10th Ave Unit 1106  
San Diego, CA 92101  
Tcwilke52@gmail.com

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## Comment Letter I94: Bill Woody, July 10, 2020

I94

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**From:** Mr. & Mrs. bill woody <wwody6228@att.net>  
**Sent:** Friday, July 10, 2020 5:45 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I94-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

bill woody  
10767 Strathmore Dr  
Santee, CA 92071  
wwody6228@att.net

**I94-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I95: James Zanger, July 10, 2020

**I95**

**I95-1:** This comment states that the proposed project will create a traffic nightmare. This comment suggests that, if all roads connect to existing streets, traffic will be considerably reduced. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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**From:** James Zanger <jameszanger@gmail.com>  
**Sent:** Friday, July 10, 2020 9:02 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

Sent from a phone:  
I am urging you to not approve a development in which every resident must use the same road. It creates a traffic nightmare. Think East Chula Vista.  
I95-1 If all the roads connect to existing streets, traffic will be considerably reduced.  
Gated cul-de-sacs are just stupid and a nightmare during a fire emergency.  
-jz  
JAMES ZANGER  
800 THE MARK LANE  
SAN DIEGO CA 92101

This comment also states that gated cul-de-sacs are a nightmare during a fire emergency. The proposed project does not include gated cul-de-sacs. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (2020) and

Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety with mitigation incorporated. This issue is adequately addressed in the EIR.

## Comment Letter I96: George Atanasov, July 11, 2020

I96

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**From:** George Atanasov <atanasovgeorge2012@gmail.com>  
**Sent:** Saturday, July 11, 2020 8:42 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I96-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

George Atanasov  
10728 Sabre Hill Dr  
San Diego, CA 92128  
atanasovgeorge2012@gmail.com

**I96-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I97: Avg Joe, July 11, 2020

I97

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**From:** Avg Joe <avgjoe619@gmail.com>  
**Sent:** Saturday, July 11, 2020 6:29 PM  
**To:** Chris Jacobs  
**Subject:** No Fanita Ranch

I97-1 Please don't allow wildlife to be needlessly killed and our beautiful natural resources to be irreversibly destroyed.

**I97-1:** This comment asks that no wildlife be needlessly killed or beautiful natural resources be irreversibly destroyed. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, in the EIR fully analyze potential impacts to sensitive plant and wildlife species and sensitive vegetation communities. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that impacts to sensitive plant and wildlife species and sensitive vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

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## Comment Letter I98: Carolyn Barkow, July 11, 2020

**I98**

**I98-1:**

This comment asks what can be done to stop the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** itzmeee@cox.net  
**Sent:** Saturday, July 11, 2020 5:04 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

Hello:

**I98-1** What can be done to stop the Fanita Ranch development?

Sincerely,  
Mrs. Carolyn Barkow

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## Comment Letter I99: Davey Butler, July 11, 2020

I99

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**From:** davey butler <user@votervoice.net>  
**Sent:** Saturday, July 11, 2020 1:46 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I99-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

davey butler  
9617 Medina Dr  
Santee, CA 92071  
daveybutler64@yahoo.com

**I99-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I100: Peggy Emanuel, July 11, 2020

**I100**

**I100-1:** This comment states the commenter’s enjoyment of the hiking trails in the City of Santee. This comment also provides an opinion that letting a developer destroy nature is a crime. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, in the EIR fully analyze potential impacts to sensitive plant and wildlife species and sensitive vegetation communities. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that impacts to sensitive plant and wildlife species and sensitive vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

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**From:** Peggy Home <pemaneul@aol.com>  
**Sent:** Saturday, July 11, 2020 7:01 AM  
**To:** Chris Jacobs  
**Subject:** Urban sprawl

To whom it may concern;  
I spend hours hiking the trails out in Santee, it's beauty is unparalleled, it's quiet is a calming spot on my soul, and it's wildlife let's me know nature at its best. To let another developer destroy and that's what they do DESTROY what nature made is a crime. Surely you are smarter then this and will stop it before it takes away a beautiful spot to reconnect with nature.  
Thank you  
Peggy Emanuel  
  
Sent from my iPad

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## Comment Letter I101: Kristine Hammond, July 11, 2020

I99

I101-1: This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

---

**From:** davey butler <user@voterveoice.net>  
**Sent:** Saturday, July 11, 2020 1:46 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I99-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

davey butler  
9617 Medina Dr  
Santee, CA 92071  
daveybutler64@yahoo.com

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## Comment Letter I102: Cathy Hays, July 11, 2020

**I102**

**From:** Cathy Hays <cathays@sbcglobal.net>  
**Sent:** Saturday, July 11, 2020 7:31 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

1102-1 | Hi Chris, My name is Cathy Hays and i have lived in Santee since 1980. I have watched it grow from  
 1 | a sleepy town to a pretty big suburb of San Diego County. I want to voice my concern over Home  
 Federal wanting to build 3,000 units in the hills off of Fanita Parkway and Cuyamaca.

1102-2 | Adding 3,000 units of additional homes in Santee is going to take away the beautiful open land that  
 2 | we have there now that so much wildlife calls home. What will happen with these animals? We can't  
 keep pushing them out or they will become extinct which then messes with the ecosystem and we are  
 now learning with COVID what happens when we do that. I don't know about you but i don't want to  
 see anymore pandemics in my lifetime. Also many people from all over San Diego hike and bike the  
 1102-3 | trails in this area which will be taken away like the open hills across from West Hills High  
 3 | School. That whole development is an eyesore with how close those houses are built. I have never  
 seen such an ugly development in my life.

1102-4 | I am also very concerned about the traffic in Santee. Before COVID when we were all going out in  
 4 | the morning to work, the streets of Santee were horrible. The backup just to get onto the 52 is  
 horrible. I have had it take me an hour sitting on Mast just to get to the entrance of the 52. Then  
 once on the 52 it takes another hour for me to get to work. I work 18 miles from my home to my  
 office. The max it should take is 30 minutes not two hours.

1102-5 | We have had so much development in this area the last few years that it really scares me. It's like the  
 5 | City of Santee does not know how to stand up to these developers and say NO. It makes me wonder  
 are people that work for City lining their pockets or is the City making huge amounts off of these  
 developers. Every piece of open land is getting built on. Whatever happened to responsible growth  
 and keeping open land for the citizens of a City.

1102-6 | I know Home Fed has said they will add an extra lane on the 52 and widen the entrance at  
 6 | Mast. That is not going to help. The 52 needs an extra 2 to 3 lanes on each side added. What about  
 the streets within the City. Mast, Fanita Parkway, Carlton Oaks, Mission Gorge, these streets are not  
 going to be able to handle the extra 6,000 cars thrown onto them a day if each unit has 2 cars. My  
 guess is it will be higher as some households could have 4 cars per house. How is the City going to  
 maintain these roads. They can't maintain them now. Most of Santee needs to be repaved and i pay  
 for that in my taxes and i am shocked when i look at the roads here. Where is that money going?

1102-7 | I know if i feel this way many more residents in Santee feel this way. Please tell the City Council to  
 7 | get some guts and just say NO to the development of this land.

Thank you for your time.

*Respectfully,  
 Cathy Hays*

**I102-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I102-2:** This comment states that adding additional housing units will take away the open land that wildlife calls home and asks what will happen to the animals. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, in the EIR fully analyze potential impacts to sensitive plant and wildlife species and sensitive vegetation communities. The EIR concludes that impacts to sensitive plant and wildlife species and sensitive vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

**I102-3:** This comment states that many people from San Diego hike and bike the trails in this area and provides an opinion regarding the aesthetic character of a different development project. The project site is on private land that is currently fenced and has “no trespassing” signs posted. As stated in Chapter 3, Project Description, the proposed project would provide approximately 35 miles of public trails. Section 4.1, Aesthetics, analyzes the

potential visual impacts of the proposed project from 16 viewpoints. Specifically, Section 4.1.5.3, Threshold 3: Visual Character, discusses the proposed project's impacts on visual quality and character and landform alteration. The EIR concludes that the proposed project would not degrade the existing landscape from a public viewpoint. This issue is adequately addressed in the EIR.

**I102-4:** This comment states the commenter's concern about traffic in the City of Santee (City) and their typical commute times to work. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**I102-5:** This comment states that the amount of development in the area over the last few years scares them and asks what happened to responsible growth and keeping open land for the citizens of the City. The project site is privately owned land; it is not owned by the City or



currently open to the public. As described in Chapter 3, the proposed project would open 35 miles of trails public trails and would provide public parks. Section 4.13, Population and Housing, analyzes the potential population and housing impacts that could result from implementation of the proposed project. The EIR concludes that the proposed project would result in a less than significant impact on population and housing. This issue is adequately addressed in the EIR.

- I102-6:** This comment states that adding an extra lane on State Route 52 and widening the entrance at Mast Boulevard will not help. The comment also states that the surface streets in the City will not be able to handle the extra cars from the proposed project. Please refer to response to comment I102-4, which discusses the transportation analysis prepared for the proposed project.
- I102-7:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I103: Carl, July 11, 2020

**I103**

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**From:** Carl & Mary <cjandme@cox.net>  
**Sent:** Saturday, July 11, 2020 12:07 PM  
**To:** Chris Jacobs  
**Subject:** NO on Fanita Ranch

Mr. Jacobs,

The voters of Santee have already spoken multiple times. NO on Fanita Ranch.

- Traffic in Santee is already a nightmare.
- One of the main reasons I left my job of 25 years in Kearney Mesa was due to the congestion on 52.
- Home Feds token offer of adding an extra on-ramp lane will NOT improve the 52.
- I live at the east end of Santee, & yet I do ALL of my shopping & other consumer activity in Lakeside, & El Cajon.
- Why? Because Traffic management within Santee is inept & incompetent at best.

How would you like it if they tore out the park in your neighborhood, & built a 200 unit condo complex, without FIRST improving the roads or Infrastructure? Dumping 400 vehicle trips / day onto your street? Not including the innumerable truck & heavy equipment trips & noise during construction?

Carl

**I103-1:** This comment states the commenter’s opinion that traffic in the City of Santee is a nightmare, an extra on-ramp lane will not improve State Route 52, and traffic in the City of Santee is not managed well. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

This comment also refers to a different development project that constructed a condominium complex. It is not clear what project is being referred to in the comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I104: Ray Ortiz, July 11, 2020

**I104**

**I104-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Mr. & Mrs. Ray Ortiz <user@votevoice.net>  
**Sent:** Saturday, July 11, 2020 8:42 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I104-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ray Ortiz  
8705 Paseo Bello  
Santee, CA 92071  
elayne.o@cox.net

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## Comment Letter I105: Nelly Purvis, July 11, 2020

I105

**From:** Roberts, Carol <carol\_a\_roberts@fws.gov>  
**Sent:** Monday, July 13, 2020 10:07 AM  
**To:** Chris Jacobs  
**Subject:** Fw: [EXTERNAL] Please listen to your citizens

I105 For your information  
 -1

*-Carol (she, her, hers)*

Carol A. Roberts, Division Chief  
 Environmental Contaminants/Federal Projects/San Diego County Activities  
 Collateral Duty Safety Officer  
 Carlsbad Fish and Wildlife Office  
 2177 Salk Avenue, Suite 250  
 Carlsbad, CA 92008  
 760-431-9440, ext. 271  
**24-hour Emergency Spill Response 760-607-9768**

**From:** Nelly Purvis <nmartin7687@hotmail.com>  
**Sent:** Saturday, July 11, 2020 2:56 PM  
**To:** Roberts, Carol <carol\_a\_roberts@fws.gov>  
**Cc:** David.Mayer@wildlife.ca.gov <David.Mayer@wildlife.ca.gov>  
**Subject:** [EXTERNAL] Please listen to your citizens

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Good afternoon,

I105  
 -2

I'm a resident here in Santee and I've noticed there's a possibility that the Fanita Ranch project might be approved pending certain requirements. Before this whole Corona situation, the traffic commute getting onto the 52 freeway has been a living nightmare. Adding more homes to this specific area is just absolutely ridiculous. On a regular weekday workday morning commute, it took me over 45 minutes just to get on the freeway alone from Mast Blvd heading to my work in Miramar. During after hours, without the huge crowds fighting to get onto the freeway, it would be about 10 minutes from my home. I mean that should speak volumes on how insane it would be to add hundreds more people in an already crowded section adding more pollution and traffic.

Also, the residents of Santee have enjoyed those trails, it's our only way closest to our area to enjoy the wildlife and the beauty that section the land has to offer. I've seen different types of animals, from a herd of Jack rabbits, multiple species of birds, and many other animals. It's really a great place and by adding these extra homes would be a detriment to our community, especially in that specific location. We have too much traffic and noise in that section during our early commute. I even feel that adding man made trails with the development doesn't

**I105-1:** This comment forwards a comment letter received by the U.S. Fish and Wildlife Service to the City of Santee (City). The comment letter, prepared by Nelly Purvis, is very similar to Comment Letter I2 prepared by Nelly Purvis (May 29, 2020) and sent to the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I105-2:** Please see responses to comments I2-1and I2-2 in Comment Letter I2 (Nelly Purvis, May 29, 2020), which addresses the same issues raised in this comment. This comment further adds an extra sentence compared to Comment Letter I2 regarding the commenter's opinion that the City cannot rob people of their property rights to create mitigation for the proposed project. The project site is privately owned and is not public property owned by the City as the commenter infers. Further, the proposed project would mitigate its biological resources impacts almost entirely onsite, as discussed in Section 4.3, Biological Resources, and the Biological Resources Technical Report (Appendix D). See response to comment I2-3 in Comment Letter I2 (Nelly Purvis, May 29, 2020) for a response to the remainder of this comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy

even match the realness of a open space filled with wildlife and trails. The added homes will take away the realness of a real open space. Please consider this plea. I don't have the money to "pay out" certain agencies like the developers do but i can speak for all the families and avid hikers who enjoy that open space. I just recently took my 7 year old there to the Rock trail and he was just ecstatic about all the boulders, such a satisfaction to be able to share whatever nature we have left. We saw deer, a herd of jack rabbits, a coyote and lots of amazing small critters/bugs, birds and one snake.

1105  
-2

cont. Finally, the City of Santee cannot rob people of their property rights to create enough mitigation for the Fanita Ranch

I have served for the U.S Navy dedicating most of my time away from family. And now I work at a military prison, the one thing that is the most therapeutic is that open space. Nature and trails are medicine to the soul, a time to reflect and enjoy time away from the busy city.

Very Respectfully,

Nelly Purvis  
[626290-1820](tel:6262901820)  
Home owner of Santee.

of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I106: Robin Rierdan, July 11, 2020

**I106**

To: The City of Santee City Council  
 From: Robin Rierdan 9232 Lapeer Ct Santee CA 92071  
 Re: Revised Draft EIR Fanita Ranch Project Comments  
 Date: July 11, 2020

I106-1 I am the executive director of Lakeside's River Park Conservancy. I have been the Executive Director for 14 years. I also hold a Masters Degree in Urban Planning from the Georgia Institute of Technology. As part of my responsibilities, I oversee the development of land restoration, habitat restoration, water quality matters, flood matters, trail development, species, and habitat monitoring. I am commenting on areas that are my expertise. These comments are mine alone and do not reflect any position of my board or organization.

I106-2 The Project as proposed will have significant, adverse impacts on both the natural and the human environment in Santee and San Diego County. These impacts include, but are not limited to, potentially devastating effects on local hydrology and water quality, habitat for both terrestrial and aquatic wildlife, local traffic, air quality, and noise.

I106-3 The REVISED DEIR fails to describe and analyze a reasonable range of feasible alternatives to the project that would substantially lessen its environmental impacts. This failure defeats CEQA's purpose of creating a process by which the public and decision-makers can fully appreciate the consequences of Project approval. As detailed in this letter, the Revised DEIR is so fundamentally flawed as to render vulnerable any approval of the Fanita Ranch Project. A revised draft EIR must be prepared and circulated to remedy these many deficiencies. Only by circulating a corrected document can the public, decision-makers, and the affected agencies be adequately informed of the environmental repercussions of the Project.

**Project Alternatives**

I106-5 The EIR fails to analyze a meaningful array of alternatives for development.  
 It doesn't analyze a 'no development' at all option  
 It doesn't analyze a variety of housing numbers  
 It doesn't analyze the project at its existing zone in any meaningful or significant manner.  
 It needs to include an alternative that includes 20 % low-income housing, not affordable housing low-income housing for people who make less than \$60K a year.

**The Revised DEIR Mischaracterizes the Project Setting**

I106-6 Accurate and complete information pertaining to the setting of the project and the surrounding uses is critical to an evaluation of a project's impact on the environment. San Joaquin Raptor/Wildlife Center v. Stanislaus County, 27 Cal.App.4th 713, 728 (1994); see also Friends of the Eel River v. Sonoma County Water Agency, 108 Cal.App.4th 859, 875 (2003) (incomplete description of the Project's environmental setting fails to set the stage for a discussion of significant effects). Here, the REVISED DEIR's deficiencies in describing the

**I106-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I106-2:** This comment provides the comment's opinion regarding the project's impacts, specifically local hydrology and water quality, terrestrial and aquatic habitats, traffic, air quality, and noise. See Sections 4.9, Hydrology and Water Quality, 4.3, Biological Resources, 4.16, Transportation, 4.2, Air Quality, and 4.12, Noise, of the EIR for a thorough analysis of these topics. Therefore, no further response is required.

**I106-3:** This comment states the EIR fails to analyze a reasonable range of feasible alternatives to the project that would substantially lessen its environmental impacts. Chapter 6, Alternatives, analyzed five different alternatives selected for evaluation to represent a reasonable range of potentially feasible alternatives that would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects of the proposed project in accordance with CEQA Guidelines Section 15126.6. Please refer to response to comment 106-5 below for additional

description of the range of alternatives analyzed in Chapter 6. This issue is adequately addressed in the EIR.

- I106-4:** This comment states that the EIR analysis is inadequate and does not properly mitigate the impacts and should be recirculated. The EIR analyzed the impacts of the proposed project on the CEQA Guidelines Thresholds and identified appropriate mitigation to mitigate those impacts to the extent feasible in accordance with the CEQA Guidelines Section 15126.4. Further, no significant new information has been added to the EIR that would warrant recirculation under CEQA Guidelines, Section 15088.5.
- I106-5:** This comment states the EIR fails to analyze a meaningful array of alternatives for development. This comment is incorrect in the assertion that the EIR does not analyze a No Development Alternative. This alternative is analyzed in Chapter 6, Alternatives, specifically Section 6.2.1, No Project/No Build Alternative. This comment is also incorrect in the assertion that the EIR does not analyze a variety of housing numbers. These alternatives are analyzed in Chapter 6, Alternatives, specifically Sections 6.2.3, Modified Development Footprint Alternative, 6.2.4, No Fanita Commons Reduced Project Alternative, and 6.2.5, No Vineyard Village Reduced Project Alternative. This comment is also incorrect in its assertion that the project does not analyze the project at its existing zone. This alternative is analyzed in Section 6.2.2, No

Project/General Plan Consistency Alternative. Please also refer to response to comment I106-3 which addresses the same alternatives issue raised in this comment.

Regarding affordable housing units, as stated in Section 4.13.2.2, the Santee General Plan Housing Element identifies the project site for above moderate housing. At 2,949 units, or 3,008 units without the school, the proposed project would meet and exceed the City's assigned allocation of 1,410 above-moderate units identified in the adopted Housing Element Site Inventory. The City of Santee General Plan contains a Housing Element certified by the Department of Housing and Community Development, the state agency charged with administering Housing Element law. With regard to the proposed project, the Fanita Ranch Specific Plan provides for an assortment of housing types at various density ranges, such as single-family detached homes, attached homes, and senior-restricted housing. These are anticipated to include both for sale and rental housing.

- I106-6:** This comment alleges that the EIR provides an incomplete description of the project's environmental setting. This comment is an introductory comment for the comments below. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

1106-7	<p>Project's setting undermine its adequacy as an informational document. The deficiencies are outlined below:</p>
1106-8	<p><b>Wildlife and Habitat Surveys</b></p> <p>The wildlife and habitat surveys are incomplete and many are old. The wildlife and habitat surveys must be revised and renewed. Several common species are expected to occur on the Ranch such as the Southern Pacific Rattlesnake and other herps that are not listed under the species found in your wildlife surveys. Additionally, no studies were done to assess the species of pollinators found on the site or assess their importance to the viability of the habitat that will remain. Pollinators, particularly native bees, butterflies and other species are being lost at an alarming rate due to habitat loss. Additionally, the studies are just now showing how critical these species are in the viability of habitat.</p> <p><b>Air Quality</b></p> <p>The Revised DEIR did not use the appropriate models for the amount of dust the project will generate nor were any studies done to determine if Valley Fever is present in the dirt. Because of the nature of the prevailing onshore breeze and because of the tight valleys that are found on the project site, the Revised DEIR must use a complex model for determining the number of pollutants, and dust that will be generated by the project both in the construction phase and post-construction. A steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources and both simple and complex terrain should be utilized. It must be acknowledged that homes are present that are due east of the project, and they would be in the direct path of dust and any Valley Fever fungus spores that are found in the soil on the project.</p> <p>Nowhere in the Air Quality Analysis is any mention made of Valley Fever (Coccidioides). This disease is known to exist in San Diego and has made many people ill. It is a professional risk to archeologists who work on Native American sites in San Diego and throughout the Southwest. It is known to exist in the El Monte Valley. Because the Fanita Ranch has not been ranched or utilized for human use since approximately 1955, and because Valley Fever was not generally a recognized disease with good diagnostics at that time, we have no information as to whether it exists in the Fanita Ranch, particularly on the playa, the central section of the project. The incidence of Valley Fever is increasing and the locations where Valley Fever is expanding. It is found in dry hot soils. It is also found in the funeral sites of Native Americans.</p> <p>Valley Fever is very hard to control in the areas where it is found. One or two spores are enough to infect a person. If to control dust, you wet it down, you activate the fungus, which causes it to grow and release more spores. If you do not wet the soil down and allow the dust to blow freely, then that dust becomes the vector as well for the disease. Consequently, anyone living downwind from the afternoon breeze that reaches the Fanita Ranch nearly daily is at risk for the disease. "In October 2007, a construction crew excavated a trench for a new water pipe.</p>
1106-9	<p><b>Air Quality</b></p> <p>The Revised DEIR did not use the appropriate models for the amount of dust the project will generate nor were any studies done to determine if Valley Fever is present in the dirt. Because of the nature of the prevailing onshore breeze and because of the tight valleys that are found on the project site, the Revised DEIR must use a complex model for determining the number of pollutants, and dust that will be generated by the project both in the construction phase and post-construction. A steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources and both simple and complex terrain should be utilized. It must be acknowledged that homes are present that are due east of the project, and they would be in the direct path of dust and any Valley Fever fungus spores that are found in the soil on the project.</p> <p>Nowhere in the Air Quality Analysis is any mention made of Valley Fever (Coccidioides). This disease is known to exist in San Diego and has made many people ill. It is a professional risk to archeologists who work on Native American sites in San Diego and throughout the Southwest. It is known to exist in the El Monte Valley. Because the Fanita Ranch has not been ranched or utilized for human use since approximately 1955, and because Valley Fever was not generally a recognized disease with good diagnostics at that time, we have no information as to whether it exists in the Fanita Ranch, particularly on the playa, the central section of the project. The incidence of Valley Fever is increasing and the locations where Valley Fever is expanding. It is found in dry hot soils. It is also found in the funeral sites of Native Americans.</p> <p>Valley Fever is very hard to control in the areas where it is found. One or two spores are enough to infect a person. If to control dust, you wet it down, you activate the fungus, which causes it to grow and release more spores. If you do not wet the soil down and allow the dust to blow freely, then that dust becomes the vector as well for the disease. Consequently, anyone living downwind from the afternoon breeze that reaches the Fanita Ranch nearly daily is at risk for the disease. "In October 2007, a construction crew excavated a trench for a new water pipe.</p>
1106-10	<p>Valley Fever is very hard to control in the areas where it is found. One or two spores are enough to infect a person. If to control dust, you wet it down, you activate the fungus, which causes it to grow and release more spores. If you do not wet the soil down and allow the dust to blow freely, then that dust becomes the vector as well for the disease. Consequently, anyone living downwind from the afternoon breeze that reaches the Fanita Ranch nearly daily is at risk for the disease. "In October 2007, a construction crew excavated a trench for a new water pipe.</p>

**1106-7:** This comment provides an introduction to the comments below. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**1106-8:** This comment states that the wildlife and habitat surveys are incomplete as to several common species and as to species of pollinators. This comment also states that many of the surveys are old.

Survey methodologies are described in Section 3.2 of the Biological Resources Technical Report, Appendix D. The schedule of surveys is summarized in Table 3-1, Schedule of Surveys on Fanita Ranch, in the Biological Resources Technical Report, and the survey efforts are summarized in Sections 3.2.1 through 3.2.15. As described therein, surveys included resource mapping, flora and fauna surveys, a jurisdictional delineation, special status plant species surveys, vernal pool branchiopod (Fairy Shrimp) surveys, Quino checkerspot butterfly habitat assessment and focused surveys, burrowing owl habitat assessment and surveys, coastal California gnatcatcher surveys, riparian bird surveys, coastal cactus wren surveys, Hermes copper habitat assessment and surveys, western spadefoot surveys, bat surveys, and a wildlife corridor camera study. Over 760

person days of site-wide, focused surveys were completed on the project site.

Focused surveys for special-status plant species were conducted in 2004 at the appropriate phenological stage (blooming and fruiting) to detect and identify the target species, as discussed in Section 3.2.5 of Appendix D of the EIR. The October 2003 Cedar Fire burned nearly the entire site and adequate rainfall provided substantial plant growth during the 2004 survey season. Following the survey effort in 2004, the climatic conditions worsened (i.e., drought) and led to years of recovery, non-native grass growth, non-native species competition, and reduced visibility to detect plants. Therefore, the 2004 survey effort provided the most comprehensive data set regarding special-status plant species. A focused survey for willow monardella (*Monardella viminea*) within the project site was conducted in June 2016.

Survey guidelines for special-status species do not typically include expiration dates and by including the previous surveys (i.e., those surveys conducted prior to 2016/2017) in the project's impact analysis the EIR provides a more comprehensive dataset of the special-status species present within the project site. When surveys were required for the proposed project, all surveys were conducted in accordance with the most recent survey protocols or guidelines (see Section 3.2 of the Biological Resources Technical Report, which is

Appendix D of the EIR). Surveys were conducted during the appropriate time of year in accordance with the specific species survey requirements.

This comment states that surveys for wildlife and habitat must be revised and renewed. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. The surveys conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the project.

The comment states that common species, such as southern pacific rattlesnake and other herpetology species, are not included under the species found in the wildlife surveys. A total of three rattlesnake species were observed within the project site, and a complete list of all wildlife species, including herpetology species, observed within the project site is included in Appendix K, Wildlife Species Compendium, to the Biological Resources Technical Report, which is Appendix D to the EIR.

The comment states that no pollinator, including native bees, butterflies, and other species, studies were conducted or assessed for their importance to habitat viability. The comment incorrectly states that no pollinator surveys were conducted. Multiple year studies were conducted within the project site for two butterfly

species and all bat species, which are also considered pollinator species, occurring on the project site. The butterfly and bat survey reports include all species recorded during the surveys (see Appendices A-C, Quino Checkerspot Butterfly Survey Reports, and Appendix O, 2016 Focused Bat Survey Results at Fanita Ranch, to the Biological Resources Technical Report, Appendix D to the EIR). It should be noted that it is not a CEQA requirement, nor standard practice, to perform pollinator surveys or assess their importance to habitat viability.

The EIR concludes that the amount of high quality habitat provided in the Habitat Preserve for all wildlife species, including pollinators, would be sufficient to support the long-term persistence of these species and the habitat itself and would contribute to reducing impacts to less than significant for several species. Furthermore, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended by commenters. The surveys conducted for the EIR have allowed for a sufficient degree of analysis to provide the information needed to determine the environmental consequences of the proposed project.

- I106-9:** The comment alleges that the air quality analysis did not use appropriate models for the amount of project-generated dust and did not determine if Valley Fever is present in the soil. The comment continues to describe

in detail the type of air dispersion model needed for the analysis, which exactly describes the modeling that was completed. Lastly, the comment expresses concern for the project archaeologist and Native American monitor.

In particular, project-generated emissions of criteria air pollutants and fugitive dust were analyzed using several models developed by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (EPA), and approved for use by the San Diego County Air Pollution Control District (SDCAPCD).

As explained in Section 4.2.4.1 of the EIR, the California Emission Estimator Model (CalEEMod) 2016 version 3.2.25 was used to develop mass emission inventories of criteria pollutants and fugitive dust based upon the construction equipment and mass grading occurring on site. CalEEMod 2016 version 3.2.25 was developed by CARB and approved for use in California Environmental Quality Act (CEQA) analysis.

Once mass emissions were defined, air dispersion modeling was performed using the EPA Regulatory Air Dispersion Model (AERMOD). The model is approved by the SDAPCD when estimating the air quality impacts associated with point and fugitive sources in simple and complex terrain. The AERMOD air dispersion model is based on planetary boundary layer theory. AERMOD fully incorporates the PRIME building downwash



algorithms, advanced depositional parameters, local terrain effects, and advanced meteorological turbulence calculations. The model was used to calculate the annual average and short duration (i.e., 1-hour) pollutant concentrations associated with each emitting source. The meteorological data between the years of 2010 and 2012 at the El Cajon Meteorological Station was provided by SDAPCD and used in the AERMOD modeling.

The AERMOD dispersion modeling results focused on the dispersion of diesel particulate matter (DPM) from the exhaust of the earth movers, graders, trenchers and other construction equipment used during site clearing, grading, trenching, and other construction activities. While the focus was on DPM, the same dispersion characteristics apply to fugitive dust. Therefore, the modeling used in the health risk analysis of DPM is a great tool in assessing the dispersion of fugitive dust.

Valley Fever is a disease caused by the spores of *Coccidioides* fungus. The City has considered the potential for *Coccidioides* fungus to occur during construction of the proposed project, particularly as it may occur during construction in the northern half of the project site in Vineyard Village, Fanita Commons, and Orchard Village. Air dispersion modeling of site clearing, grading and construction in these areas was conducted using the AERMOD dispersion model as described above. The dispersion modeling shows that

DPM particulate matter is reduced to background levels at existing residential areas downwind (east) of the ground disturbance activities. This conclusion is primarily due to the distance between existing residential areas and the ground disturbance areas in the northern portion of the site.

A more detailed discussion of the City's consideration of potential Valley Fever impacts as it relates to construction has been added to Section 4.2.5.2, Threshold 2: Cumulative Increase in Criteria Pollutant Emissions, in the EIR in response to the comment, and the Air Quality Analysis in Appendix C1 of the EIR has been supplemented with a Valley Fever Technical Report (Appendix E).

The California Department of Public Health, the County of Los Angeles, the County of San Diego all recommend watering topsoil prior to and during earth disturbance in order to reduce airborne dust emissions and the spread of *Coccidioides* spores. *Coccidioides* fungus thrives in arid environments. Without water the *Coccidioides* fungus eventually desiccates into spores. Watering during earth disturbance activities significantly reduces airborne spores and the ability of workers to inhale spores, which is the route of infection.

The proposed project is required to implement the dust control measures listed in compliance with the

SDCAPCD Rule 55, which prohibits discharges of visible dust emissions into the atmosphere beyond the property line for periods longer than 3 minutes in any 60 minute period. SDCAPCD also requires use of any of the following or equally effective trackout/carry-out and erosion control measures that apply to the project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; use of secured tarps or cargo covering, watering, or treating of transported material for outbound transport trucks. With implementation of these regulatory requirements, impacts related to Coccidioides for both onsite and offsite adjacent uses would be less than significant.

Section 4.2.5.1 of the EIR includes Mitigation Measures AIR-1 (Rule 55 Dust-Control Measures) memorializing what is required under SDAPCD Rule 55. Mitigation Measure AIR-1 includes provisions requiring that visual fugitive dust emissions monitoring shall be conducted during all construction phases. Visual monitoring shall be logged. If high wind conditions result in visible dust during visual monitoring, this demonstrates that the measures are inadequate to reduce dust in accordance with SDAPCD Rule 55, and construction shall cease until high winds decrease and conditions improve. In addition, the EIR includes Mitigation Measure AIR-2

(Supplemental Dust-Control Measures) that will reduce fugitive dust emissions even further and the chance of causing *Coccidioides* fungus spores to become airborne.

Though impacts related to Valley Fever would be less than significant, in response to the comment, Mitigation Measure AIR-2 has been revised to provide additional clarification on the precautions that would be carried out to reduce the likelihood of Valley Fever even further. Mitigation Measure AIR-2 has been revised as follows:

**AIR-2: Supplemental Dust-Control Measures.** As a supplement to San Diego Air Pollution Control District Rule 55, Fugitive Dust Control, the applicant shall require the contractor to implement the following dust-control measures during construction. These measures shall be included in project construction documents, including the grading plan, and be reviewed and approved by the City of Santee prior to issuance of a grading permit.

- The construction contractor shall provide to all employees the fact sheet entitled “Preventing Work-Related Coccidioidomycosis (Valley Fever)” by the California Department of Public Health and ensure all employees are aware of the potential risks the site poses and inform them of all Valley Fever safety protocols, occupational responsibilities and requirements such as

- contained in these measures to reduce potential exposure to Coccidioides spores.
- Apply water at least three times per day at all active earth disturbance areas sufficient to confine dust plumes to the immediate work area.
  - Apply soil stabilizers to inactive construction areas (graded areas that would not include active construction for multiple consecutive days).
  - Quickly replace ground cover in disturbed areas that are no longer actively being graded or disturbed. If an area has been graded or disturbed and is currently inactive for 20 days or more but will be disturbed at a later time, soil stabilizers shall be applied to stabilize the soil and prevent windblown dust.
  - Limit vehicle speeds on unpaved roads to 20 mph unless high winds in excess of 20 mph are present, which requires a reduced speed limit of 15 mph. Vehicle speeds are limited to 30 mph for onsite haul roads that are paved with gravel to suppress dust or where visual dust is watered and monitored frequently enough to ensure compliance with SDAPCD Rule 55.

These revisions are for clarification purposes and do not change the calculations, analysis, or conclusions identified in the EIR.

Regarding the comment's concern for the project archaeologist and Native American monitor, the February 2, 2018 scope of work (titled "Proposal - Fanita Ranch Phase II Cultural Resources Testing and Evaluation") for the firm retained by the City for the Phase II Cultural Resources Testing and Evaluation Report (Confidential Appendix E2) included safety measures for the protection of field personnel during ground disturbance to reduce the likelihood of Valley Fever (see Task 1.2), consistent with applicable state and local regulations. In fact, the work was subject to a Site Specific Health and Safety Plan, dated April 3, 2018, which included the wearing of dusk protection masks. Such precautions would continue for the Phase III work during construction under Mitigation Measure CUL-2 (Phase III Data Recovery Excavation Program).

**I106-10:** This comment states that Valley Fever is very hard to control and alleges that wetting soil for fugitive dust control "activates the fungus, which causes it to grow and release more spores." This comment also alleges that anyone living downwind of the proposed project is at risk for the disease. The comment continues with an October 2007 provided by the California Department of Public

1106-10  
cont.

Within three weeks, 10 of 12 crewmembers developed coccidioidomycosis (Valley Fever), an illness with pneumonia and flu-like symptoms. Seven of the 10 had abnormal chest x-rays, four had rashes, and one had an infection that had spread beyond his lungs and affected his skin. Over the next few months, the 10 ill crew members missed at least 1660 hours of work and two workers were on disability for at least five months." ([https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rcref/ch9.0/rcrefaletters/O10%202014-1219\\_CaliforniaDepartmentofPublicHealth2013.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/references/rcref/ch9.0/rcrefaletters/O10%202014-1219_CaliforniaDepartmentofPublicHealth2013.pdf))

Additionally, the project will be built out over 15 years, all of the vehicles that enter the project area have the potential to carry Coccidioides spores throughout Santee as the vehicles move down Fanita Parkway and Cuyamaca Street.

CalOsha requires the employer/operator to provide all employees with a Valley Fever fact sheet, (VF-6) Require the employer to pay the cost of any testing for prior exposure to Coccidioides spores (VF-7) Require the use of "National Institute for Occupational Safety and Health (NIOSH)-approved half or full-face respirators equipped with N-100 or P-100 filters" for any employee dealing with topsoil in any way. (VF-8) VF-9: Require the sand mine employer to ensure that workers who are required to use respirators as determined by a job hazard analysis shall be "medically evaluated, fitted, and properly trained on the use of the respirators, and a respiratory protection program shall be implemented in accordance with the applicable Cal/OHSA Respiratory Protection Standard" (VF-9). Require the sand mine employer to provide "separate, clean eating areas with hand-washing facilities" (VF-10) Require the employer to "ensure construction equipment, tools, and vehicles are thoroughly cleaned with water before they are moved off-site to other work locations" (VF-11) require the sand mine employer to "provide disposable Tyvek™ coveralls and change facilities for all on-site workers." And requires topsoil workers to "change clothes after work every day before leaving the worksite, to prevent the possible distribution of Coccidioides spores"

1106-11

Consequently, as part of the revision to this EIR, the project proponent should study Valley Fever on the project site. Should Valley Fever be found as part of subsequent studies, the developer will have to implement Valley Fever Safety Protocols for both the workers and for the residences that border the access and egress streets to the project during construction. Moreover, if Valley Fever is found, what steps with the project take to ensure that no one in the subdivision gets Valley Fever. This must be studied and the community must be informed.

1106-12

The Air Pollution Control District is taking a particular interest in Valley Fever in the East County. The following text is from an EIR comment letter concerning Valley Fever. "*Valley Fever (coccidioidomycosis) is caused by a fungus (Coccidioides immitis) that is endemic to the San Diego County region and which resides in the upper 2" to 12" of the soil. When the soil is disturbed the fungal spores are released into the air, exposing nearby people. Should the proposed sand mining project move forward, this risk to human health would exist as long as there are dust emissions, whether they are visible or not. This could be another source of public nuisance should people be harmed by Valley Fever.*"

Additionally, the stockpiling of soils would concentrate Valley Fever.

Health in which 10 of 12 construction crew members excavating a trench in the San Joaquin Valley contracted Valley Fever. Finally, the comment lists selected Valley Fever and dust control measures for the El Monte Sand Mining Project shown to reduce exposure to Valley Fever. Please refer to response to comment I106-9 which addresses the same issue as this comment.

**I106-11:** This comment requests that on-site Valley Fever potential be studied and if the study determines that the spores are found, implement the Valley Fever Safety Protocols. Please refer to response to comment I106-9 which addresses the same issue as this comment.

**I106-12:** This comment states that the SDAPCD is interested in Valley Fever. Please see response to comments I106-9, which address the same issues as this comment.

I106-13	<p>This EIR does not address this issue at all. Valley Fever has the potential to severely harm the health of downwind residents and residents who live near any roadway taken by construction equipment, which could carry these very small spores out of the construction site.</p>
I106-14	<p><b>Sulfur Dioxide (SO<sub>2</sub>)</b></p> <p>Currently, there is the disgusting smell of SO<sub>2</sub> emanating from the sewer treatment plant 24 hours a day 7 days a week. The smell is moved by the prevailing wind, from west to east, and will permeate nearly the entire project. Because the region experiences inversion that traps toxic air pollution, the likelihood for it to damage the health of the residents of the Fanita Ranch is problematic and bears closer study for the public to be fully informed.</p> <p>The impacts of SO<sub>2</sub> are listed below. (<a href="https://www.ccohs.ca/oshanswers/chemicals/chem_profiles/sulfurdi.html">https://www.ccohs.ca/oshanswers/chemicals/chem_profiles/sulfurdi.html</a>)</p> <p>Main Routes of Exposure: Inhalation. Inhalation: VERY TOXIC. can cause death. Can cause severe irritation of the nose and throat. At high concentrations: can cause life-threatening accumulation of fluid in the lungs (pulmonary edema). Symptoms may include coughing, shortness of breath, difficult breathing, and tightness in the chest. A single exposure to a high concentration can cause a long-lasting condition like asthma. If this occurs, many things like other chemicals or cold temperatures can easily irritate the airways. Symptoms may include shortness of breath, tightness in the chest, and wheezing. {Reactive Airways Dysfunction Syndrome (RADS)}. Skin Contact: CORROSIVE. The gas irritates or burns the skin. Permanent scarring can result. Direct contact with the liquefied gas can chill or freeze the skin (frostbite). Blistering, tissue death and infection may develop in severe cases. Eye Contact: CORROSIVE. The gas irritates or burns the eyes. Permanent damage including blindness can result. Direct contact with the liquefied gas can freeze the eye. Permanent eye damage or blindness can result. Effects of Long-Term (Chronic) Exposure: May harm the respiratory system. Can irritate and inflame the airways.</p> <p>The REVISED DEIR documents state that because Padre Dam is planning to change out its technology (RO Facility) that the deleterious impact of SO<sub>2</sub> is less than significant. However, there is no guarantee that this plant will ever be constructed. It has been in the works for 15 years. The EIR states that the objectionable odors impacting a substantial number of people would not occur. This is a significant impact because SO<sub>2</sub> should not impact any person, given the level of danger it poses. More research is needed to be done to determine the amount of SO<sub>2</sub>, the direction of wind flow from the Padre Dam facility, and how many homes and how many other sensitive receptors will be harmed. The impact needs to be reclassified as significant and unmitigated.</p>
I106-15	<p><b>Increase in downstream flooding</b></p>
I106-16	<p><b>Increase in downstream flooding</b></p>

**I106-13:** This comment states that the EIR did not address Valley Fever and that Valley Fever has the potential to severely harm the health of downwind residents and the residents who live near any roadway taken by construction equipment. Please refer to response to comment I106-9 which addresses the same issue as this comment.

**I106-14:** This comment alleges that currently there is the smell of sulfur dioxide (SO<sub>2</sub>) emanating from the sewer treatment plant operated by the Padre Dam Municipal Water District (PDMWD). It should be noted that existing residences are in closer proximity to PDMWD than the majority of proposed residences in the proposed project.

As discussed in Section 4.2, Air Quality, specifically Section 4.2.5.4, while exhaust from heavy-duty equipment on the project site during construction would emit odors, emissions of SO<sub>x</sub>, the pollutant most associated with odors, would be minimal. Operational emissions of odors would generally be confined to the Agriculture Overlay zone on the project site and would dissipate quickly beyond the limits of the Farm based on typical agricultural operations and the proposed project’s potential to generate odors would be low. Further, while not an impact under CEQA, as an impact of the environment on the proposed project, it is noted that operation of the proposed project would require implementation of Conditional Use Permit measures at the PDMWD Ray



Stoyer WRF located on Fanita Parkway west of the project site. The PDMWD Ray Stoyer Water Recycling Facility (WRF) located on Fanita Parkway west of the project site would generate odors that would potentially affect people on-site. The existing Conditional Use Permit for the PDMWD Ray Stoyer WRF contains required measures that would be implemented once the proposed project is constructed to reduce potential odor impacts. These measures include the use of an odor scrubber to limit hydrogen sulfide to 6 to 10 ppm at peak operations, the replacement of the existing primary clarifier system with a chemical scrubbing system, the covering of all zones of the biological nutrient removal basins and the installation of additional chemical scrubbers, and the installation of an additional sulfur dioxide neutralization system at the dichlorination building. These provisions by PDMWD would reduce SO<sub>2</sub> and any odor impacts to less than significant.

In addition, a Health Risk Assessment (HRA) (Appendix C2) was prepared for the proposed project and is included as Appendix C2. The HRA estimates the increased risk of health problems in people who are exposed to Toxic Air Contaminants (TACs) and examines the potential health effects from TAC emissions from the proposed project, particularly construction equipment exhaust during construction of the proposed project. As discussed in the HRA, the on-

site and off-site sensitive receptors would be subject to lower health risks during project operation than during project construction. Therefore, operation of the proposed project would not be expected to result in any basin-wide increase in health effects.

**I106-15:** This comment states that PDMWD plans to change out its technology which would reduce the odor impacts, and states that there is no guarantee that the new technology will ever be built. The comment further alleges that more research needs to be done to study SO<sub>2</sub> emissions on site. PDMWD monitors its facilities for SO<sub>2</sub> but has not detected measurable emissions beyond the fence line of its facilities. Note that water treatment facilities can emit odors that have a very similar smell to sulfur but are not SO<sub>2</sub>. PDMWD has indicated that their plans to renovate the existing Ray Stoyer WRF has been budgeted and will occur within five years. See also response to comment I106-15 regarding odors from the PDMWD facility.

**I106-16:** This comment provides an introduction to the subsequent comments regarding increased downstream flooding. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

1106-17 The EIR did not analyze the impacts of the project on downstream flooding. Instead, the document states the flood conditions and issues will be dealt with in a subsequent development agreement. This is not only unacceptable given the public's right to know impacts of this project but dangerous, because Sycamore Creek downstream of the project site is dangerously close to flooding under relatively normal precipitation events. Moreover, the bridge at Carlton Oaks Blvd with crosses the creek is substantially undersized for existing flows. It is constantly in need of dredging. Several years ago, after a normal rain year, the sediment that had collected over that year left the bridge with a little over 1 foot of freeboard to allow the water to flow under the bridge.

1106-18

1106-19 Any change to the hydrograph will leave Padre Dam, the residents of Pebble Beach Drive, and Santee Lakes at risk for severe flooding. The flood studies must be included in the EIR so the public has a clear understanding of the risk the project poses to their homes. Please see the image of flooding at Padre Dam in a point of reference. Additionally, the flood studies need to take into account the change in precipitation regimes as forecasted by *San Diego Foundation Regional Focus Study, Climate Change Related Impacts in the San Diego Region by 2050 Working Papers* compiled by The San Diego Foundation for the 2008 Climate Change Impacts Assessment, Second Biennial Science Report to the California Climate Action Team. San Diego is expected to undergo years of drought punctuated by a year or two of intensely high precipitation with significant flooding to be expected.

1106-20

1106-21 All of this must be studied and disclosed in the recirculated EIR.



**Water Quality Concerns**

1106-22 The reduction in soil surface via the hardening of the landform with houses and roads will induce several effects on the aquifer, which will be deleterious to its use by the riparian vegetation found in Sycamore Creek. In addition, the report did not provide an evaluation of current groundwater quality conditions, and neither did it provide an assessment of potential impacts to groundwater quality based on operations of the proposed project. Among the negative impacts, the accumulation of debris within from retention basins may degrade ponded water quality. Upon infiltration, aquifer water quality will decline. Further, no analysis has been done to compare pre- and post-construction infiltration rates. Sycamore Creek is one of the last remaining pristine creek systems found near the coastal region of San Diego. This creek is a

1106-23

1106-24

1106-25

**1106-17:** This comment states that the EIR does not analyze the impacts of the project to flooding that has taken place historically at Carlton Oaks Boulevard and PDMWD properties.

The CEQA requirement that the project not adversely impact the peak flows in the downstream watershed (Sycamore Creek) is addressed in the Master Drainage Study for Fanita Ranch Vesting Tentative Map (Appendix J1). This study was prepared per the requirements of the San Diego County Hydrology Manual as adopted by the city of Santee. Detention basins were designed on each watershed to reduce post-development runoff from a 100-year frequency storm to pre-development levels. The Master Drainage Study shows that post development runoff from the 100-year frequency storm to Sycamore Creek will be 583 cubic feet per second (cfs) less than predevelopment peak runoff.

For less frequent runoff events (ten-year frequency storms and under), the Storm Water Quality Management Plan (SWQMP) was prepared for Vesting Tentative Map for Fanita Ranch Permit Application Numbers GPA2017-2/TM 2017-3 per the requirements of the San Diego Municipal Storm Water Permit Order No. R9-2013-0001. The SWQMP includes the design of hydromodification basins throughout the project. These basins reduce the runoff from storms up to and including the ten-year

frequency storm to predevelopment runoff standards prior to leaving the developed portion of the property.

The proposed project would not increase the flows to Sycamore Creek from low frequency storms and would decrease runoff from the 100 year frequency storm by 583 cfs. Therefore, the project will not exacerbate the current off-site conditions. This issue is adequately addressed in the EIR.

**I106-18:** Please refer to response to comment I106-17 which addresses the same issue raised by this comment.

**I106-19:** Please refer to response to comment I106-17 which addresses the same issue raised by this comment.

**I106-20:** Please refer to response to comment I106-17 which addresses the same issue raised by this comment.

**I106-21:** Please refer to response to comment I106-17 which addresses the same issue raised by this comment.

**I106-22:** This comment asserts that the hardening of the landform with houses and roads will induce several effects on the aquifer, and asserts that such impacts will be deleterious to its use by the riparian vegetation in Sycamore Creek. The comment does not raise any issue regarding the adequacy or accuracy of the information provided in the EIR as it relates to the proposed project's impact on groundwater quality or riparian vegetation.

The commenter asserts that the proposed project would induce several effects on the aquifer but does not state or describe what these effects might be. It should be noted that the proposed project does not propose the use of groundwater which potentially could draw down the aquifer. Therefore, any impacts to water supply in the groundwater aquifer from the proposed project are limited to the impacts of decreased recharge to groundwater as a result of increased impervious area.

An analysis of potential project impacts, including the potential effects of increased impervious areas, is presented in Sections 4.9.5.2 and 4.9.6.2 of the EIR. The proposed project includes several design features that would reduce the impacts that increased impervious area could potentially have on recharge to the groundwater aquifer. These include the incorporation of pervious landscaped areas into the project design especially areas OS-1 and OS-2, along with approximately 2,022 acres of undeveloped area. The project design also incorporates features that slow runoff from developed areas, by draining stormwater into the proposed on-site basin system designed to slow peak flow and discharge to rates equal to or less than existing conditions, allowing it to infiltrate the ground surface. See also Appendix J1, which provides hydromodification calculations for the biofiltration basins. In addition, as part of the EIR process, pre and post development

evaluations of the surface hydrology were performed which included estimating the quantity of water that infiltrates to the aquifer based on existing soil types (Appendix J5). Based on these design features and these analyses, the EIR concluded that the proposed project would not substantially deplete groundwater or interfere substantially with groundwater recharge, such that the impacts would be less than significant.

**I106-23:** This comment asserts that the EIR did not provide an evaluation of current groundwater quality conditions and potential impacts to groundwater quality based on operations of the proposed project. The City disagrees with this comment. Section 4.9.1.3, Groundwater Quality, describes the current conditions of the San Diego River Valley Groundwater Basin.

It is noted that, given that the proposed project does not include the use of groundwater or the drilling of groundwater wells, the potential impacts on groundwater quality are limited to any impact of infiltrating surface water on the quality of underlying groundwater. As discussed in Section 4.9.2 of the EIR, the proposed project is subject to several federal, state and local regulations that require the maintenance of surface water quality. Construction activities at the project site would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that would include a series of project-specific Best

Management Practices (BMPs) that would be implemented during construction to protect surface water runoff by addressing erosion, accidental spills, and water quality of stormwater runoff. After the completion of project construction, the proposed project would be subject to the City's Stormwater Management Ordinance and other regulations discussed in EIR Section 4.9.2.3, which would require the design and installation of permanent BMPs for stormwater pollutant controls. Project BMPs would be designed to protect the quality of surface water, and since contaminated surface water is the potential source for degradation of groundwater quality, protection of surface water quality would ensure that groundwater quality is not degraded by project activities. Further discussion of water quality impacts are presented in Section 4.9.5.1 of the EIR. Please also refer to Section 4.9.5.3 for further discussion of BMPs and design features that protect water quality, and see Appendices J2, J3 and J4, which provide the Stormwater Quality Management Plans.

**I106-24:** This comment questions whether accumulation of debris within the proposed retention basins may degrade ponded water quality. All on-site basins provide biofiltration and would be designed in compliance with the San Diego Municipal Separate Storm Sewer Systems Permit (MS4s) Order No. R9-2013-0000 as amended per Order Nos. R9-2015-0001 and R9-2015-0100 and implemented in City

of Santee Stormwater Management Ordinance. These regulations require that stormwater be filtered through an engineered soil and gravel section within a specified length of time. These permits also require the removal of trash and debris. It should be noted that ponded water would not be contained for an extended length of time. Instead it would be discharged to Sycamore Creek at a prescribed rate. Attachment 3a to Appendix J2, the Storm Water Quality Management Plan, summarizes the maintenance responsibilities and schedules for structural BMPs, including these retention basins.

**I106-25:** This comment states that infiltration of surface water would degrade aquifer water quality. The comment also states that the EIR does not compare the pre- and post-construction infiltration rates. Finally, the comment states that exposed minerals and elements could be washed down during dust control operations and infiltrate the ground.

The comment does not explain the basis for the assertion that groundwater quality would decline through infiltration. It should be noted that, as described in the response to comment I106-23 above, degradation of groundwater quality as a result of surface water infiltration would occur only if the quality of the surface water is poorer than the quality of underlying groundwater. As described in the response to comment I106-23, the proposed project contains several elements



that are designed to ensure that surface water quality would not be significantly degraded.

Section 4.9.5.3, Threshold 3: Site Drainage and Hydrology, discusses the pre- and post-development conditions for the proposed project in relation to surface flows and the infiltration requirements of the San Diego Regional Water Quality Control Board. This section describes the Master Drainage Study, included as Appendix J1, which evaluates the pre-development project 100-year flows to be 3,312 cubic feet per second and post-project runoff flows to 2,729 cubic feet per second, for a reduction of 583 cubic feet per second versus existing conditions, attributable, in part, to infiltration. Appendix J3 sets out the water quality and hydromodification calculations affected by infiltration basins. Impacts on infiltration rates also are discussed in the EIR Section 4.9.5.2 and the Stormwater Infiltration Feasibility Study (Appendix J5).

With respect to the comment suggesting water infiltration from dust control, the City disagrees with the comment. The quantity of water applied for dust control does not produce any material quantity of run-off or percolation that leads to infiltration to groundwater. Water for dust control is minimally applied to that which is necessary to keep only the topmost layer of the soil moist, not wet enough to produce any substantial quantity of infiltration. Consequently, the inference of the comment that minerals

will be “washed down during dust control operations and infiltrate the ground” is simply based on an incorrect understanding of the amount of water that would be applied for dust control operations.

Further, geologic formations mapped on the project site include Stadium Conglomerate, Friars Formation, Granitic Rock and other geologic units as described in EIR Appendices G1 through G4 (Geotechnical Investigations). These formations are not associated with naturally occurring uranium, asbestos or salts. Finally, implementation of the SWPPP and the Storm Water Quality Management Plan would minimize the exposure of minerals and elements and protect surface water and groundwater quality.

- 1106-25
- precious resource for its magnificent riparian woodlands as well as its use as a wildlife corridor. It should be fully protected.
- Water quality may also become compromised when exposed minerals and elements (e.g. uranium, asbestos, salts, etc.) are washed down during dust control operations and infiltrate the ground.
- 1106-26
- Hazardous Material Storage (Reclamation Plan §2.6 Waste). The REVISED DEIR description of the handling and storage of hazardous materials is curt. The REVISED DEIR has not elaborated on plans to protect groundwater.

**City of San Diego Pueblo Water Rights**

Please remember that the City of San Diego owns all of the water rights within the Fanita Ranch. Any impact on their water rights may be problematic for them. Below is the text from a CEQA comment letter from the City of San Diego Public Utility department describing their rights and the extent of their rights in Subject: Subsequent Draft Environmental Impact Report: El Monte Sand Mining and Nature Preserve PDS2015-MUP-98-014W2, PDS2015-RP-15-001 Log No. PDS2015-ER-98-14-016B

1106-27

*"The City has a distinct interest in the Project given the City's paramount water right in the naturally occurring waters of the San Diego River. The City holds a pueblo right to water in the San Diego River. (San Diego v. Cuyamaca Water Co. (1930) 209 Cal. 105 (Cuyamaca); San Diego v. Cuyamaca Water Co. (1930) 209 Cal. 152, 164-165 (Cuyamaca II); City of San Diego v. Sloane (1969) 272 Cal. App. 2d 663, 666 (Sloane).) The pueblo right gives the City the prior and paramount right to use all surface and subsurface flow of the San Diego River, including its tributaries, from its source to its mouth, for the use of the City and of its inhabitants, for all purposes. (Cuyamaca I at p. 151.) The pueblo right extends to any percolating groundwater in a groundwater basin that supports the San Diego River's surface and subsurface flows. (See Los Angeles v. San Fernando (1975) 14 Cal. 3d 199, 247-251 (San Fernando).) The pueblo right attaches only to waters naturally occurring in the watershed of the San Diego River. (Cuyamaca I at p.151; see San Fernando at p. 251; see also Los Angeles v. Glendale (1943) 23 Cal.2d 68, 73 (Glendale).) This includes waters that, but for impoundment, would have reached a subterranean basin supporting the San Diego River through the natural flow of the tributary streams. (See Glendale at p. 73.)*

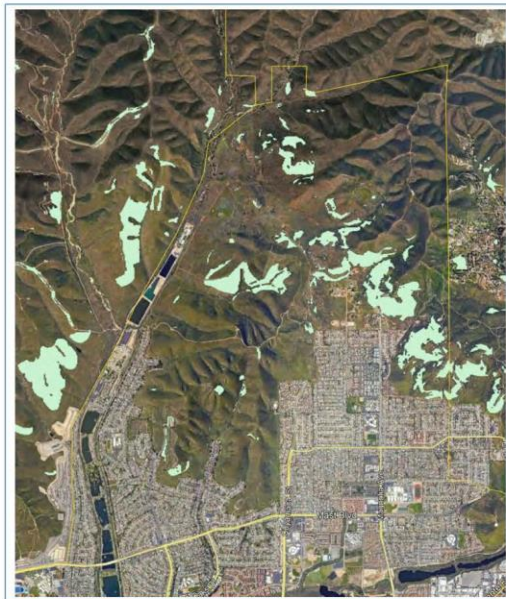
*The City's pueblo right confers the first priority to use of the water "to the extent of the needs of [the City's] inhabitants ... and the further right ... to manage and control the said waters for those purposes." (Feliz v. Los Angeles (1881) 58 Cal. 73, 80 (Feliz); see Cuyamaca II at p. 165.) The right extends to that amount of water that the expanding needs of the City's inhabitants require. (Vernon Irrigation Co. v. Los Angeles (1895) 106 Cal. 237, 250-251; Cuyamaca II at p. 164;*

**1106-26:** This comment states the EIR description of the handling and storage of hazardous materials is curt and does not elaborate on plans to protect groundwater. Section 4.8, Hazards and Hazardous Materials, analyzed the hazards and hazardous materials impacts that may result from the implementation of the proposed project and identified appropriate mitigation to mitigate those impacts to the extent feasible in accordance with the CEQA Guidelines Section 15126.4. This issue is adequately addressed in the EIR.

**1106-27:** This comment questions the proposed project's impact on the City of San Diego's pueblo water rights. This comment does not address the adequacy or accuracy of the Draft EIR, and this response is provided for information purposes only. The City of San Diego's pueblo rights to groundwater are noted. The proposed project's effect on water supply and water right is analyzed in Section 4.17 of the Draft EIR. Section 4.17.1.1, Water, describes the provision of water to the proposed project from Padre Dam Municipal Water District. It notes that Padre Dam Municipal Water District imports 100 percent of its water through the San Diego County Water Authority. Section 4.17.5.2, Water Supply Availability, analyzes the water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. This assessment concludes water

1106-27  
*Glendale at p. 75.) The pueblo right applies to the inhabitants in the pueblo's original territory and also applies within the territory of the City added by annexation. (San Fernando at p. 252, fn. 43.)*  
*Practical management of water subject to a pueblo right includes storage of water to meet the needs of the City's inhabitants. (See Felix at pp. 76-77, 80; see also Cuyamaca II at p. 165.) Subsurface storage is akin to a natural reservoir. (Glendale at p. 76.) Thus, subsurface storage is suitable for storage of water subject to the City's pueblo right."*

Critical Core Sediment Yield Areas



The REVISD DEIR also did not thoroughly analyze impacts to critical coarse sediment yield areas (CCSYA) or avoid them. These are mapped coarse soils that are beneficial to water quality so should be avoided.  
 The site is mapped with critical coarse sediment yield areas (see the image)

1106-28

1106-29

1106-30

supplies are sufficiently available to meet the proposed project's demand in normal, single dry, and multiple dry years without using groundwater.

**1106-28:** This comment is a picture of the Potential Critical Coarse Sediment Yield Area PCCYSA prepared by the County of San Diego.

The Watershed Management Area Analysis (WMAA) potential Critical Coarse Sediment Yield Area (PCCSYA) Map was a regional mapping effort prepared by the County of San Diego. These maps were prepared as a guide and do not have project level detail. Appendix H of the County of San Diego BMP Design Manual provides the Guidance for Investigating Critical Coarse Sediment Yield Area. Section H.7.3 defines the methodology to refine the PCCSYA mapping using the more detailed data from site specific Geology, Land use and Slopes. As presented in Appendix J6, Potential Critical Course Sediment Yield Area Analysis, a site-specific PCCSYA map using more detailed analysis per Section H.7.3 of the Guidance for Investigating Critical Coarse Sediment Yield Area was developed for use in the analysis of the Fanita Ranch Project. This issue is adequately addressed in the EIR.

**1106-29:** This comment states that The Fanita Ranch Draft Revised Environmental Impact Report did not analyze

impacts to Potential Critical Coarse Sediment Yield Areas (PCCSYA).

The EIR included The Storm Water Quality Management Plan (SWQMP). The SWQMP Included a Hydromodification Management Plan and a Technical Memorandum entitled Analysis of PCCSYA's for Fanita Ranch. The Analysis of Critical Coarse Sediment Areas, Appendix J6, prepared by Dr. Luis Parra, PhD provides the analysis of the PCCSYA avoidance or demonstrated to have no net impact to the watershed through a detailed Erosion Potential Analysis per Appendix H.8 of the County of San Diego BMP Design Manual.

The result of this analysis is that through the combined protection of natural area and the Erosion Potential Analysis there is no net impact to the Potential Critical Coarse Sediment Yield Areas (Appendix J6). This issue is adequately addressed in the EIR.

**I106-30:** This comment states that the Potential Critical Coarse Sediment Areas (PCCYSA) should be avoided unless additional analyses are performed. Refer to Appendices J6 and J7 for the PCCYSA analysis for the proposed project. Please also refer to response to comment I106-29 which addresses the same issue raised in this comment.

1106-30 cont.	below). The City of Santee's BMP Design Manual indicates that CCSYA's are to be avoided unless additional analyses are performed. A separate report was prepared to analyze CCSYA's.
1106-31	The CCSYA's mapped in the report do not match the RWQCB mapping. The RWQCB mapping must be avoided or assessed.
1106-32	The CCSYA report indicates that certain Point of Compliance (POCs) are not encroaching into the drainage areas. After the CCSYA mapping is corrected all upstream CCSYA's tributary to the project footprint must be analyzed.  The CCSYA report states that it is "impossible to establish at this level the proportion of the sloped area that consists of coarse bed material. . . ." If this cannot be established, avoidance is the only option.  A CCSYA encroachment of 1% is unacceptable. The project must provide complete avoidance unless analyses are provided.
1106-33	The report must demonstrate that the "geology of the cut areas will remain the same as the geology of the terrain before cutting while the geology of the fill area will be similar than the geology of the soil underneath."
1106-34	The report must demonstrate that "(a) natural slope will be replaced by a higher-inclination artificial slope (so slope cannot be considered as a limiting factor, and as a matter of fact the cut or fill slope will have a tendency to produce more sediment than the natural terrain underneath if all other variables remain constant); (b) land use of the sloped area is natural landscape (and therefore land use cannot be considered as a limiting factor for those areas) and (c) runoff from the areas must not flow into a BMP because coarse sediments will be trapped.  Justify use of the 0.25 practice factor.  Justify the de minimis area? What is the threshold for de minimis? It should be 0 acres.  Justify that sufficient slopes existing to carry CCSYA. No sediment transport analyses were provided.  Justify absence of sieve analysis. How can Critical Core Sediment be verified without sieve analysis?
1106-35	The report states "The project cannot avoid the totality of the CCSYA's included within the boundary of POCs 1, 2A, 2B, 3, 4 and 10 as many of those areas are located in places planned for development or for fill slopes." The desire for development is not an excuse for non-avoidance.

**1106-31:** This comment states that the Potential Critical Coarse Sediment Yield Area mapped in the report do not match the San Diego Regional Water Quality Control Board mapping.

The Watershed Management Area Analysis (WMAA) potential Critical Coarse Sediment Yield Area (PCCSYA) Map was a regional mapping effort prepared by the County of San Diego. These maps were prepared as a guide and do not have project level detail. Appendix H of the County of San Diego BMP Design Manual provides the Guidance for Investigating Critical Coarse Sediment Yield Area. Section H.7.3 defines the methodology to refine the PCCSYA mapping using the more detailed data from site specific Geology, Land use and Slopes. As presented in Appendix J6, Potential Critical Coarse Sediment Yield Area Analysis, a site-specific PCCSYA map using more detailed analysis per Section H.7.3 of the Guidance for Investigating Critical Coarse Sediment Yield Area was developed for use in the analysis of the proposed project. This issue is adequately addressed in the EIR.

**1106-32:** This comment states that it is "impossible to establish at this level the proportion of sloped areas that consist of coarse bed material" and avoidance is the only option.

The EIR included The Storm Water Quality Management Plan (SWQMP). The SWQMP Included a

Hydromodification Management Plan and a Technical Memorandum entitled Analysis of PCCSYA's for Fanita Ranch. The statement quoted was from Section 2.3 of the Appendix J6, Critical Coarse Sediment Yield Area Analysis, referring to the analysis of cut and fill areas. As determined in Section 2.3.1 of the Potential Critical Coarse Sediment Yield Area Analysis, this mitigation methodology was not used on the proposed project. This is because, following a discussion with the City of Santee and the City's third-party reviewer, it was agreed that the inclusion of Fill and Cut Areas is not specifically included as a simplified alternative in Appendix H of the County of San Diego BMP Design Manual, and therefore the process explained in Section 2.3 is not valid, even if it follows the intent of the permit in terms of protection of CCSYAs. This issue is adequately addressed in the EIR.

**I106-33:** This comment states the report must demonstrate “the geology of the cut areas will remain the same as the geology of the terrain before cutting while the geology of the fill area will be similar to the geology of the soil underneath.”

The statement quoted was from Section 2.3 of Appendix J6, Critical Coarse Sediment Yield Area Analysis, referring to the analysis of cut and fill areas. As determined in Section 2.3.1 of the Potential Critical Coarse Sediment Yield Area Analysis, this mitigation methodology identified in Section 2.3 was not used for

the proposed project. This is because, following a discussion with the City of Santee and the City's third-party reviewer, it was agreed that the inclusion of Fill and Cut Areas is not specifically included as a simplified alternative in Appendix H of the County of San Diego BMP Design Manual, and therefore the process explained in Section 2.3 is not valid, even if it follows the intent of the permit in terms of protection of CCSYAs. This issue is adequately addressed in the EIR.

**I106-34:** This comment quotes several additional passages from Section 2.3 of the EIR Appendix J6, Potential Critical Coarse Sediment Yield Area Analysis. Refer to response to comment I106-34 for a response to the issue raised in this comment.

**I106-35:** This comment states that there are several areas of Potential Critical Coarse Sediment Yield Area that are not avoided by the proposed project and that development is not an excuse for non-avoidance.

Section H.2 of the County of San Diego BMP Design Manual Guidance for Investigating Critical Coarse Sediment Yield Areas does not state that avoidance is the only mitigation method for PCCSYA. Several mitigation measures detailed in Sections H.2 – H.4 may be used.



The EIR included Appendix J2, Storm Water Quality Management Plan (SWQMP). Included in the SWQMP are the Hydromodification Management Plan and Technical Memoranda entitled Potential Critical Course Sediment Yield Area (PCCSYA) Analysis (On-Site) and PCCSYA Analysis (Off-Site). These technical memoranda are also included in the EIR as Appendices J6 and J7. The Analysis of Critical Coarse Sediment Areas prepared by Dr. Luis Parra, PhD provides the analysis of Erosion Potential and Sediment Supply Potential per Appendix H.8 of the County of San Diego BMP Design Manual.

The result of this analysis is that through the combined protection of natural area and the Erosion Potential/Sediment Supply Analysis there is no net impact to the Critical Coarse Sediment Yield from the development of the Fanita Ranch Project. Therefore, no mitigation measures are required. This issue is adequately addressed in the EIR.

1106-36	The Geomorphic Landscape Unit (GLU) mapping is completely different than the County mapping, which leads to skepticism of the results.
1106-37	The soil loss equation was developed for agricultural lands, not for terrain that exists at Fanita Ranch.
	<b>Stormwater</b>
	<b>SWQMP</b>
1106-38	The SWQMP proposes biofiltration or proprietary treatment. On the contrary, the hierarchy is harvest and use followed by infiltration. The harvest and use assessment is a simple handwritten form. A detailed I&U assessment should be performed and I&U used, where feasible.
	Infiltration testing should be performed throughout the site and infiltration BMPs selected where feasible. The site plan should be adjusted to accommodate infiltration, as needed. The few selected locations for assessment are not sufficient.
	The SWMM model assumes n-imperv of 0.012 for impervious surfaces. This is not a Manning's value. Clogging should be assumed. Clogging potential cannot be avoided with small orifices.
	<b>Master Drainage Study</b>
	The HEC-RAS study was performed in 2007. Sycamore Canyon is natural, so subject to geomorphological changes. A 13-year old study will not represent current conditions and must be updated.
1106-39	The project will result in an overall decrease in flow rates. What impact does this have on habitat and wetlands? This must be reanalyzed to protect the health of Sycamore Creek.
	The flow rate at the individual discharge locations can vary widely between existing and proposed conditions. What are the habitat, wetlands, and sediment impacts?
	Focused flow releases at drainage outfalls under proposed conditions can create erosion and sediment impacts.
	Soil group D was assumed for all proposed areas, while all soil groups were assumed for existing conditions. This will not allow a fair comparison and make skew the results unfavorably.
	Assess the impacts from the natural drainages within the project footprint that are being altered.
1106-40	<b>Groundwater Supplies</b>

**1106-36:** This comment states that the Geomorphic Landscape Unit (GLU) mapping is different from the County mapping.

The Watershed Management Area Analysis (WMAA) potential Critical Coarse Sediment Yield Area (PCCSYA) Map was a regional mapping effort prepared by the County of San Diego. These maps were prepared as a guide and do not have project level detail. Appendix H of the County of San Diego BMP Design Manual provides the Guidance for Investigating Critical Coarse Sediment Yield Area. Section H.7.3 defines the methodology to refine the PCCSYA mapping using the more detailed data from site specific geology, land use and slopes. As presented in Appendix J6, Potential Critical Course Sediment Yield Area Analysis, a site-specific PCCSYA map using more detailed analysis per Section H.7.3 of the Guidance for Investigating Critical Coarse Sediment Yield Area was developed for use in the analysis of the proposed project. This issue is adequately addressed in the EIR.

**1106-37:** This comment states that the soil loss equation was developed for agricultural lands, not Fanita Ranch.

Section H.8.2 of the Guidance for Critical Coarse Sediment Yield Area prepared by the County of San Diego BMP Design Manual states that the Revised Universal Soil Loss Equation (RUSLE) should be used

in estimating the sediment yield from hillsides. The RUSLE is widely used in determining sediment yield in construction activities as well as farming operations. Appendix J6, specifically Section 4.2, presents the RUSLE calculations completed for the proposed project. This issue is adequately addressed in the EIR.

- 106-38:** This comment states that harvest and use, infiltration options should be used for the proposed project. It also questions the n-imperv value of 0.012 in the SWMM model.

Harvest and reuse feasibility analysis is included in Worksheet B.3-1 of the Storm Water Quality Management Plan (SWQMP) (Appendix J2). Per the San Diego County BMP Manual methodology, it was determined that the 36 hour demand is less than 0.25 of the Design Capture Volume so Harvest and Use is considered to be infeasible.

Infiltration Feasibility analysis is included in Worksheet C.4-1 of the SWQMP. Per the County of San Diego BMP Manual Methodology and the Geotechnical Investigation for Fanita Ranch, it was determined that due to the existing Soil Groups C and D, infiltration in any appreciable rate or volume is not feasible.

The n-imperv value of 0.012 in the SWMM model is correct per the County of San Diego HMP Manual and local criteria. This issue is adequately addressed in the EIR.

**I106-39:** This comment states a number of concerns with the Master Drainage Study (Appendix J1) including the age of the 2007 Sycamore Creek Study, the decrease in flow rates, the variance in flow rates at individual discharge locations, erosion at drainage outfalls, the use of Soil Group D, and the impacts from the natural drainages that are being altered.

The 2007 Floodplain Analysis for Fanita Lake study of Sycamore Creek by Rick Engineering was prepared for Barratt American Inc. and is referred to in the Master Drainage Study (Appendix J1) for reference. Per CEQA, the proposed project is required to mitigate runoff so as not to adversely impact the Sycamore Creek Watershed. The proposed project is not required to mitigate existing downstream flooding issues that may exist.

The overall decrease in flow rates of 583 cfs referred to in the Master Drainage Study (Appendix J1) is for the peak discharges for the 100-year frequency storm. Since flooding has been indicated as an issue historically, this peak discharge decrease would be beneficial to the Sycamore Creek Watershed. The Storm Water Quality Management Plan for the proposed project includes a Hydromodification Management Plan which manages post-development runoff up to and including the ten-year frequency storm to closely match predevelopment runoff to reduce any impact to the Sycamore Creek

Watershed or the upstream tributaries. Since the flows are at or below pre-development conditions, the velocities and erosion potential is reduced as well.

Soil Group D was assumed for the post-development calculations. During the grading operations, soils are mixed. It is standard practice to use the Soil Group with the highest runoff coefficients and lowest infiltration rates. This yields conservative results as it increases the design runoff in the post-development condition.

The SWQMP addresses the runoff from all developed areas prior to the runoff entering any natural watercourse outside the graded footprint. Each outfall to these natural areas has been cleaned per the per the San Diego Regional Water Quality Control Board (RWQCB) requirements and the runoff will be mitigated per the San Diego Hydromodification Management Plan (RWQCB 2016). Therefore, these issues are adequately addressed in the EIR.

1106-40 cont. The proposed project would be designed to minimize potential effects on groundwater recharge and would not use groundwater during project construction or operation.

The project failed to analyze any aspect of groundwater in the Sycamore Creek Drainage. The Revised DEIR references the Basin Plan and a variety of other state and local plans that are designed to protect groundwater quality and recharge, the Revised DEIR does not study groundwater at all. There are no maps as to the limits of the aquifer. There is no data looking at the amount of recharge or the time and or quality of that recharge. So it is impossible to see how the project will meet the mandates of state and local plans, based on no information as to the location, volume, or other details of the Sycamore Creek aquifer.

**Water Quality Control Plan or Sustainable Groundwater Plan**

1106-41 Implementation of the proposed project would have the potential to generate pollutants during construction and post-construction activities; however, compliance with applicable regulations would ensure that it would not conflict with or obstruct the implementation. We do not know how the retention basins described in the REVISED DEIR integrate with groundwater in terms of volume, pollutants, and timing. The timing of groundwater recharge is very important for the riparian habitat found in Sycamore Creek. That habitat is one of the last vestiges of an oak-dominated creek in the coastal section of San Diego County. Its viability rest largely in the quality, proximity and timing of groundwater flows. This REVISED DEIR does not analyze any impacts to groundwater. A subsequent study must be undertaken to ensure that the impacts to groundwater are detailed and understood. All of Sycamore Creek must be included in the MSCP, see the map below.

**The Multiple Species Conservation Plan**

1106-42 One of the aspects of the Fanita Ranch is that with the approval of this project, the City of Santee intends to also approve the Santee Multiple Species Conservation Subarea plan as it approves of the Fanita Ranch development. Any reference to that plan cannot be found in this Revised DEIR. Even with a call to City Staff, meaningful references to the plan cannot be found.

Even with these instructions from City staff:  
Go to the City's web site, to Fanita Ranch, then to Sharepoint.  
Here is the path:  
<http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/default.aspx>  
Then,

Put Tab 492 in the search bar in section (G)(2) and the 12-2018 City of Santee, Wildlife Agency Review Draft Santee MSCP Subarea Plan should come up in the search.

I could not find this citation and neither could City staff. This must be rectified on a recirculated Revised Draft EIR.

**I106-40:** This comment questions the EIR’s analysis of state and local mandates regarding “the Sycamore Creek aquifer.” The aquifer underlying the proposed project is the San Diego River Valley aquifer not the Sycamore Creek aquifer. EIR Section 4.9.1.3 and Master Drainage Study (Appendix J1) discuss state and local mandates related to groundwater, including the Water Quality Control Plan for the San Diego Basin (Basin Plan), the Sustainable Groundwater Management Act, and the City of Santee Jurisdictional Runoff Management Program. Please see response to comment 106-22 for further response.

**I106-41:** This comment questions the adequacy of the EIR’s analysis of impacts to groundwater in terms of the quality, proximity and timing of groundwater flows. Please refer to the responses to comments I106-22 and I106-23 that respond to the same issues.

**I106-42:** The comment states “the City of Santee intends to also approve the Santee Multiple Species Conservation Subarea plan as it approves of the Fanita Ranch development.” The comment continues that any reference to the MSCP cannot be found in the EIR. The comment concludes that the commenter could not find the 2018 Draft MSCP Subarea Plan.

The commenter's statement is incorrect – the City would not be adopting the City’s MSCP Subarea Plan together

with the approval of the proposed project (if it is approved). Section 3.12, Discretionary Actions, lists the proposed and future discretionary actions required to implement the proposed project. Adoption of the City's MSCP Subarea Plan is not a listed future action. Also, adoption of the City's MSCP Subarea Plan is not assumed or required for the approvals for the proposed project. While demonstrating consistency with a Draft Plan is not a requirement under CEQA because such plans are not adopted and may not be adopted, nevertheless the proposed project is consistent with the Draft MSCP Subarea Plan. Section 4.3.5.6, Threshold 6: Habitat Conservation Plan, and Section 4.3.6.6., Cumulative Threshold 6: Habitat Conservation Plans, of the EIR analyzed the proposed project's consistency with the City's Draft MSCP Subarea Plan and determined that "implementation of the current project design would be consistent with the Draft Santee MSCP Subarea Plan and would not compromise future implementation of the MSCP Subarea Plan ... because [it] meets all requirements and provides a greater level of conservation than required for the Santee MSCP Subarea Plan pursuant to the MSCP Plan."

Finally, the commenter states that they were not able to find any reference to the 2018 Draft Santee MSCP Subarea Plan in the EIR. In fact, there are innumerable references to it throughout Section 4.3: Biological

Resources. To the extent that the commenter was attempting to locate a copy of the City's Draft MSCP Subarea Plan, the Wildlife Agency Review Draft Santee MSCP Subarea Plan December 2018 is posted on the City's website ([http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/Remainder%20of%20the%20Record/\(2\)%20Reference%20Documents%20from%20EIR%20&%20Technical%20Reports/Tab%20492%20-%202018-12%20Santee%20SAP%20Wildlife%20Agency%20Review%20Draft%20Dec18v2.pdf](http://sntbberry.cityofsanteeca.gov/sites/FanitaRanch/Public/Remainder%20of%20the%20Record/(2)%20Reference%20Documents%20from%20EIR%20&%20Technical%20Reports/Tab%20492%20-%202018-12%20Santee%20SAP%20Wildlife%20Agency%20Review%20Draft%20Dec18v2.pdf)).

It is noted the commenter refers to and includes a copy of a “map found in the Wildlife Agency Review Draft Santee MSCP Subarea Plan December 2018,” in the text of the comment letter marked for the following comment.



1106-43

As a small property owner (APN 3781800300) whose land falls within the boundaries MSCP plan, I just strongly object to the treatment of the 85 other small property owners whose land is located at the northern end of Magnolia Avenue in an area known as either the Magnolia Bowl or the Summit Ave area. The total acreage held by these property owners is at least 350 acres or close to 450 acres depending on the map considered. This plan places far more burden on the small property owners located in this area than it places on the Fanita Ranch project. The Fanita Ranch project is required to provide mitigation at 62% of their land area while, depending on the map found in the WILDLIFE AGENCY REVIEW DRAFT Santee MSCP Subarea Plan December 2018, the area that will be conserved by the Northern Magnolia area will be between 75% to 90-95 percent. See the map below.

**1106-43:** The comment expresses the commenter’s opinion regarding smaller property owners’ treatment under the Draft MSCP Subarea Plan compared to the proposed project, and expresses concern that the commenter’s property is included in an area covered by the plan. The comment states the proposed project would provide mitigation at 62% of the project site’s land area while properties in the Northern Magnolia area are required to conserve between 75 to 90-95 percent.

The Draft Santee MSCP Subarea Plan includes differing percentages of preserved open space, depending on the relative sizes of the parcels in the Plan area and the planned preserve area that results from the development of those parcels. The proposed project, similar to other master-planned communities in the San Diego region, is very large (over 2,600 acres) and typical open space dedications are very sizable (in the 100’s to 1,000’s of acres) compared to average-sized undeveloped parcels of 5-10 acres such as in the Draft Santee MSCP Plan’s North Magnolia Subunit. Additionally, it should be noted that: (1) hardline and softline areas are not directly comparable to determine fairness not only because of the size of set aside land but also because the hardline project has extensive restoration obligations that are not proposed for softline. (2) The proposed softline set aside is not new land and was in the 1998 Draft MSCP Plan; (3) The value of the area for conservation is apparent

from GIS data/vegetation mapping. Surveys of the property were not necessary to establish basis of deciding that some portion of the softline areas should be conserved; (4) Reference to any percentage above 75 percent was in recognition that some areas may be acquired and is not a suggestion that individual landowners in softline preserve areas would be required to set aside more than 75 percent.

It should be noted that the commenter's property may be included in the Santee MSCP Subarea Plan boundary, but in no way is there a statement being made by the project's EIR document that concludes that the commenter's property would be conserved in the same way as Mission Trails Regional Park.

1106-43  
cont.

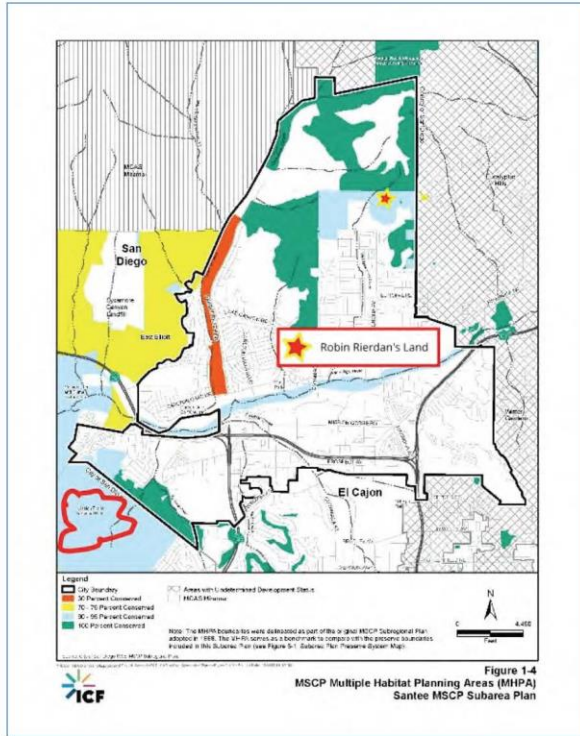


Figure 1-4  
MSCP Multiple Habitat Planning Areas (MHPA)  
Santee MSCP Subarea Plan

Please note that this map indicates that our property will be entirely conserved in the same way that Mission Trails Regional Park is conserved. Imagine my surprise to see this. I object to this on the following grounds.

1106-44

**Unequal treatment under the law and due process concerns**

**1106-44:** The commenter states that property owners in the “Magnolia Bowl” area were not notified by the City that their properties were being considered for inclusion in the City's MCSP Subarea Plan. The comment further suggests that the applicant was allowed to participate in negotiations with the City and wildlife agencies and was allowed to negotiate lower conservation ratios than small property owners in the "Magnolia Bowl" area. It should be noted that the proposed project has not yet received a building permit. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1106-44  
cont.

The Fanita Ranch developer and the City of Santee engaged in a pattern and practice to intentionally hide from the property owners in the Magnolia Bowl area that their property was being considered for inclusion in Santee MSCP Subarea Plan. I certainly NEVER received a notice that my property was even being considered for inclusion in this plan. Not one other property owner in this area was ever officially notified that their property was being included in this plan. If you get a building permit, you have notice the property owners within a certain distance from the project. The City of Santee didn't feel it was incumbent on them to notice that they intended to take 90% of our development rights.

The developer of the Fanita Ranch was allowed to be part of the negotiations with the City of Santee and with the wildlife agencies and allowed to negotiate for a lesser mitigation ratio than the Magnolia Bowl property owners. We were intentionally blinded by the City of Santee so that we would have no say as to the disposition of our property while HomeFed was allowed to negotiate their mitigation ratio and indeed received a much less burdensome mitigation ratio than did these small property owners.

**Arbitrary and Capricious**

None of our property was ever studied for its value as habitat. At no point, did I give permission to the City of Santee to enter my property to study it for its habitat potential, not would I. (I have been told in about 2004 by City staff, that the property was studied. If such a study did occur, then it is too old to be used as the basis of this plan.) The inclusion of my property and the property of other landowners have had no studies, such has been done for the Fanita Ranch. Until such studies have been done to ascertain, in a legally binding manner, the land should not be placed in the mitigation reserve. Legally, you have no idea what kind of wildlife or habitat resources are located on my property. If you have studied it, you did so illegally by trespass. What you do know is that my property is undeveloped. Therefore the inclusion of this land should be considered null and void.

1106-45

The burdensome and egregious mitigation ratio that the City of Santee intends to place against the small property owner was part of a negotiation to reduce the burden on the Fanita Ranch and transfer this burden to the small property owners. The land in this area is zone hillside residential meaning that only one or two homes can be built on each parcel. The remaining portions of our land will be left vacant under the existing zoning. The 86 homes we may one day construct will have nowhere near the harmful effects of the Fanita Ranch to habitat, resources, and species but we are being asked to carry the extreme burden of that mitigation.

The land in this area has already been zone as low-density development. The addition of this property will force any future development to do the work that the City of Santee may or may not have done to include in the MSCP by way of very expensive habitat studies to document the species and habitat types found on our land. Your plan intends to take 90% of our property rights from us, and should we decide to develop the one or two homes that we can develop under the existing zoning, we must complete very expensive studies that may make the proposed single-family dream home unaffordable for most of these property owners. In reality,

**1106-45:** The comment states that their property was not studied for its value as habitat, the property should not be placed in the mitigation reserve, and expresses the commenter's opinion about the expected mitigation requirements for smaller property owners under the City's MSCP Subarea Plan. The comment also states that development of the project site will require higher conservation ratios for smaller property owners, with preservation standards of up to 90 percent, and states that through the MSCP Subarea Plan the City intends to take property rights. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. However, it should be noted that approval of the Santee MSCP Subarea Plan, which may include the commenter's property, would not result in the commenter's property being used to mitigate for the proposed project. The proposed project does not rely in any way on the commenter's property for the project's mitigation obligations.

1106-45 cont. you intend to take 90% of our property rights from us and then force us to pay for the privilege of that loss of property rights.

**5% Take Rule**

1106-46 When the MSCP program was developed in the late 1990s and early 2000's the City of Santee steadfastly refused to participate in this program. When they declined to participate, the Wildlife Agencies enacted the '5% take' rule. That rule said the City of Santee can only develop 5% of the 'habitat' land in the city until they had a fully approved MSCP subarea plan. ALL of that '5% take' was given to the Sky Ranch development in approximately 2007. Since that point in time, because the City gave all of its development rights to Sky Ranch, the small property owners with 'habitat' have not been able to develop at all in the Magnolia Bowl area. When property owners have approached the City to begin the permit process, they were not told they could not develop because the City of Santee had given away all of its take authority to Sky Ranch and that we property owners could not develop, we were given the giant run around until the property owners gave up. This is also a regulatory takings for 13 years. Had the City of Santee been honest players with these property owners, they would have removed all of the property in the Magnolia area, allowed the small property owners to develop their dream homes, and placed the burden for mitigation on the property where the most severe of the resource losses would occur, on the Fanita Ranch.

1106-47 Lastly please note, if the residents of Santee decide to sue the City of Santee over the approval of the Fanita Ranch, you have a nexus for forcing the developer of the Fanita Ranch, Homefed, to pay to defend that lawsuit. You have no such nexus here. If the small property owners decide to band together and sue the City of Santee for a regulatory taking and a variety of other issues, you, the City of Santee, will be forced to pay for that your selves. I very much appreciate the opportunity to comment on the Draft Revised Environmental Impact Report for the Fanita Ranch. I look forward to reading the revised and re-circulated document.



Robin Rierdan  
Santee Resident

Attachments:

1106-48 **Chapter 6: Hydromodification Management Requirements for PDPs**  
Applicant CCSYA mapping

**1106-46:** The comment provides background information on the “5% Take Rule” which suggests that the City was only permitted to allow development on 5 percent of the coastal sage scrub habitat within the City until the City had an approved MSCP Subarea Plan. Interim take was allowed under a Section 4(d) Rule issued under the federal ESA. The comment continues that the 5 percent "take" was “given to the Sky Ranch development in approximately 2007” and subsequently smaller property owners have not been able to develop, which has amounted to a regulatory taking. Smaller property owners have proceeded since the exhaustion of the 5 percent with individual permitting. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1106-47:** The comment states that if Santee residents sue the City over the approval of the proposed project, the City has "a nexus for forcing the [applicant] to pay to defend the lawsuit". However, the commenter states that if "small property owners decide to ... sue the [City] for a regulatory taking" or other issues, the City would be required to pay for the lawsuit itself. The comment continues with a concluding statement thanking the City for the opportunity to comment on the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

I106-48  
cont.

## Chapter 6: Hydromodification Management Requirements for PDPs

**6.1 Hydromodification Management Applicability and Exemptions**

As noted in Chapter 1, Section 1.6, a project may be exempt from hydromodification management requirements if it meets any one of the following conditions:

- The project is not a PDP;
- The proposed project will discharge runoff directly to existing underground storm drains discharging directly to water storage reservoirs, lakes, enclosed embayments, or the Pacific Ocean;
- The proposed project will discharge runoff directly to conveyance channels whose bed and bank are concrete lined all the way from the point of discharge to water storage reservoirs, lakes, enclosed embayments, or the Pacific Ocean; or
- The proposed project will discharge runoff directly to an area identified by the Copermittees as appropriate for an exemption by the WMAA for the watershed in which the project resides.

The above criteria reflects the latest list of exemptions that are allowed under the MS4 Permit and therefore supersedes criteria found in earlier publications.

Exempt water storage reservoirs and lakes in San Diego County are shown in the WMAA for each watershed. To qualify for the potential exemption, the outlet elevation of the storm water conveyance system discharging to the water storage reservoir or lake must be at or below either the normal operating water surface elevation or the reservoir spillway elevation, and properly designed energy dissipation must be provided.

**6.2 Protection of Critical Coarse Sediment Yield Areas**

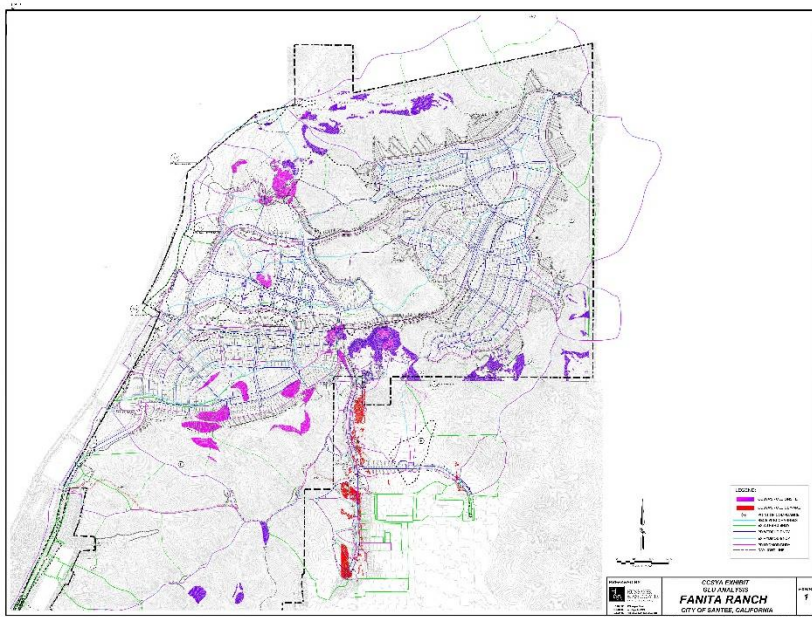
When hydromodification management requirements are applicable according to Section 6.1, the applicant must determine if the project will impact any areas that are determined to be critical coarse sediment yield areas. A critical coarse sediment yield area is an area that has been identified as an active or potential source of coarse sediment to downstream channel reaches. Potential critical coarse sediment yield areas for each watershed management area are delineated in the associated WMAA.

If potential critical coarse sediment yield areas are identified within the project drainage boundaries based on the maps included in the WMAA, the areas should be assumed to be critical coarse sediment yield areas requiring protection unless further study determines either: (1) based on detailed project-level verification of Geomorphic Landscape Units (GLUs) described in Section 6.2.1, the areas are not actually potential critical coarse sediment yield areas, or (2) based on the flow chart in Section 6.2.2, the receiving water system is not sensitive to reduction of coarse sediment yield, or (3) based on detailed investigation described in Section 6.2.3, the areas are not producing sediment that is critical to receiving streams.

**I106-48:** This comment provides a reference to an attachment included by the commenter titled Chapter 6: Hydromodification Management Requirements for PDPs. The attachment is provided in the Response to Comments Attachments section of EIR Volume III. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**References**

RWQCB (Regional Water Quality Control Board). 2016. Water Quality Control Plan for the San Diego Basin (9). September 8, 1994. Amended May 2016.



1106-48  
cont.

#### Chapter 6: Hydromodification Management Requirements for PDPs

For projects with critical coarse sediment yield areas identified within the project drainage boundaries, Section 6.2.4 provides management measures for areas that are onsite, and Section 6.2.5 provides management measures for areas that are offsite and draining through the project. If no potential critical coarse sediment yield areas are identified within the project drainage boundaries, no measures for protection of critical coarse sediment are necessary. The project will require measures for flow control only (see Section 6.3).

The first step to determine if the project will impact any critical coarse sediment yield areas is to consult the map included in the WMAA. The outcome of that initial analysis will determine the need for subsequent analysis as follows:

- If the project is shown to not impact any potential critical coarse sediment yield areas according to the WMAA map, typically no further analysis is required. This includes reviewing the entire drainage area draining through the project site for nearby potential critical coarse sediment yield areas where the runoff will travel through the project site. Because the WMAA maps are macro-level maps that may not represent project-level detail, the City Engineer may require additional project level investigation described in Section 6.2.1 even when the maps included in the WMAA do not indicate the presence of potential critical coarse sediment yield areas.
- If the project is shown to impact potential critical coarse sediment yield areas according to the WMAA map, then the applicant may conduct one or further analyses described in Sections 6.2.1, 6.2.2, and 6.2.3. The additional analyses are optional. The result of any of the additional analyses may invalidate the finding or modify the finding of the WMAA map, or it may confirm the finding of the WMAA map.
- If it is determined that the project will impact critical coarse sediment yield areas after the applicant has exercised all elected options for further analyses, then management measures described in Sections 6.2.4 and 6.2.5 are required.

##### 6.2.1 Verification of GLUs Onsite

The Potential Critical Coarse Sediment Yield Area maps in the WMAAs identify areas that are considered potential critical coarse sediment yield areas based on their GLU. A GLU is a combination of slope, geology, and land cover. A regional-level WMAA was prepared that determined GLUs that are considered to be potential critical coarse sediment yield areas. These GLUs are areas with a combination of open (undeveloped) land cover, high relative sediment production based on a normalized revised universal soil loss equation analysis, and coarse grained geologic material (material that is expected to produce greater than 50% sand when weathered).

The maps included in the WMAA are macro-level maps that may not represent project-level detail. If the WMAA maps indicate the presence of potential critical coarse sediment yield areas within the project site, detailed project-level review of GLUs onsite may be performed to verify the presence or absence of potential critical coarse sediment yield areas within the project site. Some jurisdictions may require verification of GLUs for all projects (including projects where the WMAA maps do not indicate the presence of potential critical coarse sediment yield areas).



### Comment Letter I107: Denise Smith, July 11, 2020

I107

I107-1: This comment states the commenter’s opposition to the proposed project. This comment also states the commenter’s opinion that traffic will be a nightmare that could cause hazards to evacuation. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance.

In addition, Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires and evacuation that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed

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**From:** denise smith <river852001@yahoo.com>  
**Sent:** Saturday, July 11, 2020 6:59 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

1107-1 Good afternoon. My name is Denise Smith. I am a life long resident of Santee Since 1966. I do not believe Fanita Ranch is a good idea for us. Not only the nightmare traffic, it will also prove to be a hazard when we need to evacuate due to fire earthquakes etc. my family and neighbors oppose this project. And it is more then truly unfortunate that our vote is a joke. Just like the Weston houses across from the high school. I am beginning to believe people forget how they got where they are...voted in. Thank you for taking the time to read and consider what I've said. Denise

[Sent from Yahoo Mail on Android](#)

project. The EIR concludes that the proposed project would have a less than significant impact on wildfire and evacuation safety with mitigation incorporated. These issues are adequately addressed in the EIR.

## Comment Letter I108: Mark Brouker, July 12, 2020

**I108**

**I108-1:** This comment states the commenter’s experiences with traffic issues and how further development would result in near gridlock. It also mentions project construction and damage to the environment. The EIR addresses 18 environmental topics in detail in Chapter 4, including project construction and operation, and identifies feasible mitigation measures to reduce significant impacts. In particular, Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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**From:** Mark Brouker <m.e.brouker@gmail.com>  
**Sent:** Sunday, July 12, 2020 10:58 AM  
**To:** Chris Jacobs  
**Subject:** Preserve Santee

I108-1  
Dear Sir, Please help us defeat the proposal to build Fanita Ranch as is being planned. We've owned our home since 1983. The traffic issues have grown steady worst since that time, and any further development would result in near gridlock. We absolutely do not desire years of construction and the damage to the environment that this development will bring. Let's stop this now before it gets and further traction. Very Respectfully,  
Captain Mark Brouker USN (Retired) 9325 Remuda Ct, Santee, CA 92071.

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## Comment Letter I109: Diane Burkard, July 12, 2020

**I109****I109-1:**

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**From:** Diane Burkard <dianeburkard@yahoo.com>  
**Sent:** Sunday, July 12, 2020 11:40 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

109-1  
As a current and past resident (since 1975) I wanted to express my concerns about the HomeFed Corp's plans for a 3,000 unit for development in Santee. Fanita Hills is one of the last remaining remaining regions homes to many species of wildlife and plants that we residents want to preserve. Not to mention the additional homes which will bring additional families and countless vehicles and their traffic to our City. The residents have and continue to register their disapproval of the City Council's backhanded and unethical maneuvers to push their own agenda for this development. The residents of Santee want their voices to STOP this development from going forward now or in the future. This should be put on the ballot for all residents to vote on to prove that we do NOT want this plan to move forward. Thank you.

Sincerely,

Diane Burkard

This comment states the commenter's concerns about the proposed project, including impacts to wildlife, plants, and traffic, and the commenter's general opposition to the proposed project. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, in the EIR fully analyze potential impacts to sensitive plant and wildlife species and sensitive vegetation communities. Based on the opinions of the biological experts who prepared the analysis, the EIR concludes that impacts to sensitive plant and wildlife species and sensitive vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

In addition, Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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## Comment Letter I110: Betsy Burke, July 12, 2020

**I110**

**From:** Roberts, Carol <carol\_a\_roberts@fws.gov>  
**Sent:** Monday, July 13, 2020 10:06 AM  
**To:** Chris Jacobs  
**Subject:** Fw: [EXTERNAL] Fanita Ranch

I110-1 For your information  
 1

*-Carol (she, her, hers)*

Carol A. Roberts, Division Chief  
 Environmental Contaminants/Federal Projects/San Diego County Activities  
 Collateral Duty Safety Officer  
 Carlsbad Fish and Wildlife Office  
 2177 Salk Avenue, Suite 250  
 Carlsbad, CA 92008  
 760-431-9440, ext. 271  
**24-hour Emergency Spill Response 760-607-9768**

**From:** Betsy Burke <Betsy-Burke@cox.net>  
**Sent:** Sunday, July 12, 2020 2:38 PM  
**To:** Roberts, Carol <carol\_a\_roberts@fws.gov>; David.Mayer@wildlife.ca.gov <David.Mayer@wildlife.ca.gov>;  
 Melissa.Stepek@wildlife.ca.gov <Melissa.Stepek@wildlife.ca.gov>; Sobiech, Scott <scott\_sobiech@fws.gov>;  
 John.Donnelly@wildlife.ca.gov <John.Donnelly@wildlife.ca.gov>; lkhrrata@sandag.org <lkhrrata@sandag.org>  
**Subject:** [EXTERNAL] Fanita Ranch

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

I110-2  
 2

I've heard that the City of Santee wants to use eminent domain to steal private property and land at the North end of North Magnolia Avenue in Santee to build an exit road from Fanita Ranch if it gets developed for homes. Even with an exit on that end of North Magnolia and an exit near Santee Lakes and 1 firestation on Fanita Ranch that will not stop a fire from taking out homes in that area. It shouldn't be built on at all.

I survived the Cedar Fire that came through when I worked Graveyard at Barona Casino. They had 1 firestation, CDF, and only two roads out, just like the plan for Fanita Ranch. The Cedar Fire came during a Santa Ana with winds were at 70 mph and there was no way out. The only thing that saved us was the golf course to the north at the casino, but over 11 people died on Wildcat Canyon Road in Lakeside because people could not get out. We were trapped for 48 hours until the fire naturally burnt away from us and it was burning the area of Fanita Ranch and the hillsides of Santee when I got home.

Please be aware that putting homes in that valley with nature trails going through it is going to be a recipe for a fire disaster that could cost lives if they can't get out. Just remembering seeing the burnt up cars on Muth Valley

**I110-1:** This comment forwards a comment letter received by the USFWS to the City of Santee. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I110-2:** This comment states that despite several proposed exits and an onsite fire station there is a general wildfire risk of the proposed project. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

Road where people burned alive with their pets that didn't make it makes me think of what would happen if Fanita Ranch was built.

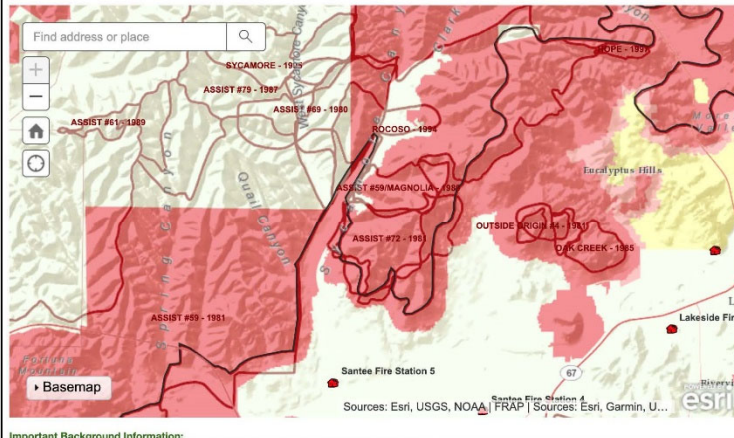
<http://ready.sandiego.org/wildfire-hazard-map/>

If a fire comes from the northeast during a Santa Ana that area will burn again. You can't have both homes and a nature preserve there without a major fire risk that would be risking lives right?

Maybe Mission Trails or the County of San Diego can buy the land and connect it to the Goodan Ranch Sycamore Canyon County Preserve?

Betsy Burke  
Santee, CA

1110-2  
cont.



Important Background Information:



### Comment Letter I111: Chatton, July 12, 2020

I111

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**From:** chatton1 <chatton1@cox.net>  
**Sent:** Sunday, July 12, 2020 11:30 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

I111-1 I am writing you to vehemently oppose the building of Fanita Ranch. There is no way, in many citizens opinions, there will be any relief in traffic if you build Fanita Ranch. Cuyamaca Rd. is already overcrowded with traffic, as is Mast Blvd. All you need to do is hang out on these roads any time of the day and watch how many vehicles drive on them ,all hours of the day, especially "rush hour". There is no way any proposed traffic mitigation plan will alleviate traffic problems, especially when you add hundreds of homes. Not to mention the destruction of wilderness land that should be preserved, not built on. Please stop Fanita Ranch from ever being built. Say no to the city council members that will very likely benefit from real estate sales after homes are built, and members who will also benefit from insurance. This is why they are so adamant it gets built.

Sent from my Verizon, Samsung Galaxy smartphone

**I111-1:** This comment states the commenter’s general opposition to the proposed project and their doubt that there will be any traffic relief if the proposed project is built, even with the proposed traffic mitigation plan. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

The comment also mentions the destruction of wilderness that should be preserved. The proposed project would preserve 1,650.4 acres or approximately 63 percent of the proposed project site as Habitat Preserve, which would be owned, conserved, and managed in perpetuity. Therefore, this issue is adequately addressed in the EIR.

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## Comment Letter I112: Mike Deacon, July 12, 2020

**I112**

**I112-1:** This comment states the commenter’s general opposition to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Mike Deacon <mikejdeaon@gmail.com>  
**Sent:** Sunday, July 12, 2020 1:29 PM  
**To:** Chris Jacobs  
**Subject:** No to Fanita Ranch

I112-1  
1  
I am still baffled as to how this project is still moving forward. Talking to large members of the Santee community through groups and forums, there seems to be an overwhelming opposition to the project moving forward. I even thought we had voted on this back in 2018 but apparently it had been pulled.  
I am against this completely. There has been enough new home and town home projects in Santee over the last several years. I know this first hand purchasing one of them and leaving my 20 year old home. The negatives of this severely outweigh the positives and I would urge you and the city of Santee to stop any movement forward on this and listen to your citizens. If this actually makes it to vote this November, it will be defeated handily.  
Thank you for taking the time to read this.

Sincerely,

Mike Deacon  
Santee Resident  
8640 Camden Drive  
Santee, CA 92071

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## Comment Letter I113: Deniece Evans, July 12, 2020

**I113**

**I113-1:** This comment states the commenter’s general opposition to the proposed project and that it is causing current traffic congestion. The proposed project has not been approved. No current development occurs on the project site; therefore, the proposed project is not contributing to current traffic conditions. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

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**From:** Deniece Evans <denievals1969@gmail.com>  
**Sent:** Sunday, July 12, 2020 11:49 AM  
**To:** Chris Jacobs  
**Subject:** Stop Fanita Ranch

I113-1 Stop the crazy building of Fanita Ranch...keep Santee the family community that it is now... Would have been better if the Fanita Ranch that's already there hadn't started but since it has the traffic has become insane. I've been in this community for 50 years and now it's getting out of hand

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## Comment Letter I114: Margaret Field, July 12, 2020

ATTN: Chris Jacobs, Principal Planner  
 Subject: Fanita Revised Draft EIR  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071

Dear Mr. Jacobs,

I, Dr. Margaret Field, am a professor of American Indian Studies at San Diego State University and a linguist who specializes in Kumeyaay language. For the last two decades I have taught classes on American Indian languages, oral tradition, and California Indian history and culture, among others. I am also currently working on a collaborative project to map the Kumeyaay placenames found in the Mission registers. My work on this mapping project has led me to realize that the proposed Fanita Ranch development is within an area identified in the Mission records as the “Valle San Luis” which was particularly rich in Kumeyaay placenames (over 30), indicating that many people lived there.

It is my professional opinion that the indigenous people who inhabited this site have only ever been Kumeyaay people or their ancestors, who spoke related ancestral languages belonging to either the Yuman language family or the extremely ancient Hokan stock (the oldest language stock in California.) All of the related descendant tribes (12 of them today in the U.S. and 5 more communities south of the border) are collectively referred to as the Kumeyaay Nation. In other words, no other unrelated indigenous group ever inhabited this location, in my professional opinion.

According to the EIR (sec. 4.4 page 57), the City of Santee contacted 24 tribes listed with the NAHC (some obviously not Kumeyaay) in October 2018 with notification letters about this project, yet none requested consultation meetings at that time. My understanding is that this lack of response was due

**I114**

**I114-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I114-2:** This comment states that the Kumeyaay Nation is the sole indigenous group that has occupied the project site over time. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I114-3:** This comment asserts that the City of Santee (City) should have consulted with the newly created Kumeyaay Historic Preservation Council (KHPC) under California Public Resources Code, Section 21080.3.1 (also referred to as Assembly Bill [AB] 52). The comment omits the following provision in Section 21080.3.1, which states, “Prior to release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) *the California Native American tribe requested to the lead agency, in writing, to be*

*informed by the lead agency* through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe . . . .” (emphasis added).

As explained in detail in Section 4.4.1.3, Known Cultural Resources, of the EIR (Senate Bill 18 Consultation and Assembly Bill 52 Consultation), the City sent AB 52 notification letters to the three tribal contacts that formally requested notification of projects in the City on September 7, 2018. Under California Public Resources Code, Section 21080.3.1(b), the tribes had 30 days from receipt of the notification letters to request consultation under AB 52. KHPC did not request notice of City projects or consultation on the proposed project under AB 52 until June 10 and June 30, 2020, after the EIR for the proposed project was released for public review on May 29, 2020, and more than a year and a half after the City notified requesting tribes of the proposed project. On July 2, 2020, the City responded to Tom Holm at KHPC explaining that the time period for consultation under AB 52 had expired.

KHPC was also absent from the Local Government Tribal Consultant List provided by the Native American Heritage Commission to the City in October 2018, when the City sent the Senate Bill 18 notification letters to the 24 tribes provided on the list. Of the nine groups represented by KHPC, however, six groups were



I114-3  
cont.

to the fact that the Kumeyaay Nation had created a new pan-Kumeyaay organization called the Kumeyaay Historic Preservation Council (the KHPC), to oversee management of Kumeyaay tribal cultural resources other than human remains (for which another organization, the Kumeyaay Cultural Repatriation Committee, exists), but had not hired a director until February 2020, shortly before the release of the EIR in late May. When I became aware of the EIR I immediately notified the new director of the KHPC, Mr. Tom Holm, of the City's renewed plans for development on this culturally sensitive site. It is my understanding that he immediately wrote the City of Santee requesting that the KHPC be included in the city's negotiations over tribal cultural resources, but was immediately rebuffed. He then tried again, sending another more explicit letter, which was again rejected. This situation is not acceptable. Tribal governments are small, underfunded, and extremely overtaxed, and they rely on organizations like the KHPC to help them manage their affairs. The Kumeyaay Historic Preservation Council (KHPC) is exactly the organization which should have been notified in September 2018, but for some reason was not. Rejecting their request for consultation at *any point in the process* is a violation of CEQA 21080.3.1 e) which clearly states: "The lead agency shall begin the consultation process within 30 days of receiving a California Native tribe's request for consultation."

I114-4

As the CRM studies cited in the EIR report, the Fanita Ranch location provided a vantage point that would have allowed those occupying the Sycamore Canyon valley to look out over a broad expanse of territory, and so is a natural location for a village. It is also a strategic location connecting ancient trails along the San Diego river, a life-giving and important natural resource for Kumeyaay people and their ancestors, with Sycamore canyon and what is today Poway. Just one mile north of the Fanita Ranch site is the Goodan Ranch/Sycamore Canyon Preserve, where over 50 significant prehistoric cultural resources have been recorded (SD County 2013.) Approximately 3 miles south of Fanita Ranch, archaeological work on the site of the Carlton Oaks golf course also found over 50 prehistoric sites (SANDAG 2017), and nearby on top of Cowles mountain an ancient Kumeyaay

individually contacted as part of Senate Bill 18 because they were listed on the consultation list provided by the Native American Heritage Commission.

While KHPC can, and has, submitted comments on the EIR as any member of the public (see California Public Resources Code, Section 21080.3.2[c]), the time period for AB 52 consultation has expired. The City concluded consultation with the one tribe that requested consultation (Barona Band of Mission Indians [Barona]) on July 31, 2020. After nearly 2 years of consultation with Barona, the parties have agreed to the mitigation measures in the EIR and conditions of project approval to address the tribe's concerns. It is not reasonable to expect the City to voluntarily reopen AB 52 consultation because of a newly formed organization that did not timely request notice of City projects as provided for in the statute. To do otherwise would defeat the purpose of the time frames in the statute. Senate Bill 18 and AB 52 do not contain any such provisions requiring that consultation be reopened. The City has added KHPC to its AB 52 notification list, and KHPC will be notified of future projects as required under CEQA.

**I114-4:** This comment addresses the cultural significance of the area. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no

I114-4 cont. solstice site was destroyed by construction of Mission Trails Regional Park, despite warnings of the archaeological and cultural significance of the site, because the county determined in its report that “the site was felt to have little potential for public, special social, or governmental values” (Sorenson 1988). In my opinion the Fanita Ranch site appears to be a key link in a chain of prehistoric Kumeyaay sites since it has yielded so much archaeological information to date, and undoubtedly has more to tell us. The EIR itself tells us that the request that the city made to discover all previous surveys done in a 1 mile radius of the APE produced 95 sites, 13 of which are within the “project vicinity” and 11 within the APE itself. More information on these may be found within the “confidential appendix E” which I do not have access to.

I114-5 “Capping” the multiple sites in the APE of Fanita Ranch would make any further archaeological study of these sites impossible, but even leaving them uncapped while building a development across them would make it impossible to observe them in their natural state, which can reveal so much about prehistoric Kumeyaay lifeways. The findings of the 20+ archaeological studies that have been conducted over the past 45 years on Fanita Ranch make clear that there were at least one if not two Kumeyaay villages located on this proposed site. The two largest archaeological sites, CA-SDI-8243 and CA-SD-8345 have both been identified by archaeologists as prehistoric habitation sites consisting of many milling features, ceremonial items and human remains.

I114-6 As the EIR clearly states, CA-SDI-8243, the largest and most diverse assemblage of all the sites tested, yielding 473 artifacts, is a large prehistoric habitation site containing ceremonial quartz crystals and human remains. The constituents still present at the site retain the potential to continue yielding data pertinent to research, and the archaeologists recommended it as eligible for the NRIP and CRIR under Criterion D/4: “Have yielded, or may be likely to yield, information important in prehistory or history,” and “Development impact would be significant.”

I114-7 The other site which is likely either an extension of the same village or else a second village altogether is CA-SDI-8345. According to the archaeological research conducted it is also considered

I114-8

further response is required. Nonetheless, the City acknowledges the commenter’s concern for cultural resources. The City has required extensive archaeological investigations to further understand the nature of the area and to analyze the potential impacts of the proposed project on any such resources. A summary of these studies can be found in Section 4.4.1, Environmental Setting, and in Confidential Appendices E1, E2, and E4.

**I114-5:** This comment addresses the pros and cons of site capping from the commenter’s perspective. Mitigation Measure CUL-1 (Site Capping Program) requires placement of a cap on a portion of one site where significant resources were found, including human remains. The Kumeyaay Cultural Repatriation Committee was designated as the mostly likely descendent (MLD) for the project site. The Kumeyaay Cultural Repatriation Committee represents several Kumeyaay tribes in the County of San Diego (including those affiliated with the KHPC). The MLD has indicated that, because human remains are present throughout sites CA-SDI-8243 and CA-SDI-8345, they consider all artifacts present to be potential funerary objects. Additionally, Barona consulted with the City for the proposed project and recommended capping be used to preserve in place sensitive cultural resources. Under California Public Resources Code, Section 5097.98, the MLD provided the recommendation for capping to avoid further impacts to human remains and funerary objects. The applicant has agreed to comply with the MLD’s recommendations for capping. A limited data

recovery program has been proposed and would be executed prior to capping; however, the City and landowner consider the protection of human remains and associated funerary objects to be the primary concern. The City has determined that the MLD's concerns for the protection for their ancestors supersede the desire for future study by the archaeological community. Notably, Mitigation Measure CUL-1 requires a minimum of 24 inches of fill material be maintained between the surface of the archaeological cap and any ground-disturbing activities per Barona's request.

- I114-6:** This comment summarizes previous archaeological investigations on the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I114-7:** This comment addresses the National Register of Historic Properties and California Register of Historical Resources (NRHP/CRHR) significance of CA-SDI-8243. The City agrees that CA-SDI-8243 retains data potential and remains eligible for the CRHR under Criterion 4. To mitigate the impact to the site, a Phase III data recovery program would be executed prior to construction as described in Mitigation Measure CUL-2. The MLD and the consulting tribe have concurred with the proposed plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1114-8 cont. a habitation site, consisting of several bedrock outcrops with milling features, resource processing tools and habitation debris (faunal, ceramics, and lithics, a ceremonial artifact and the presence of human remains) all of which suggest this site functioned as a habitation site during the Late Prehistoric Period. The diversity of artifacts encountered suggest CA-SDI-8345 has the potential to yield significant information regarding prehistory, and so this site is also eligible under Criterion D/4: Have yielded, or may be likely to yield, information important in prehistory or history. As the EIR states: "Due to the scarcity of archaeological resources and the potential for construction activities associated with future development projects to impact these resources, a significant cumulative impact to archaeological resources exists." (p.60) Concerning the human remains found on both of these sites, as pointed out by the researchers, these bits of bone, some of which are burned, are located on shallow soil and appear to have surfaced by means of bioturbation (animals or plants disturbing the soil). Atkins (2016, cited in the EIR) found concentrations of highly fragmented burned bone immediately west of CA-SDI-8243, as well as within CA-SDI-8338a (now a part of CA-SDI-8243), within the updated CA-SDI-8243 boundary, and within the updated boundary of CA-SDI-8345. All of them occur near large collections of bedrock milling features. As the EIR states, because of the condition of these remains and their context occurring within this large site, it is likely that this bone represents human cremations which may extend into the subsurface. If, as suggested by the archaeologists, these two sites represent habitation centers, these pieces of bone may have migrated to the surface over the centuries from a village cemetery.

1114-9

1114-10 But more importantly, it is not just the human remains which need to be protected in these sites, but their totality, as the last example we may have of at least one (if not two) large Kumeyaay village(s) as they looked at contact. In my professional opinion as a professor of American Indian Studies, their educational value lies not only in what archaeologists may find by digging underneath them, but in leaving them alone to be observed as they are, in situ. Local flora and fauna are also relevant to understanding traditional Kumeyaay lifeways, and are equally informative, as is the view

**1114-8:** This comment addresses NRHP/CRHR significance of CA-SDI-8345. The City agrees that CA-SDI-8345 retains data potential and remains eligible for the CRHR under Criterion 4. To mitigate the impact to the site, a Phase III data recovery program would be executed prior to construction as described in Mitigation Measure CUL-2. The MLD and the consulting tribe have concurred with the proposed plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1114-9:** This comment addresses concerns related to human remains on the project site. The presence of human remains throughout site CA-SDI-8345 has been identified by the MLD. The City and landowner consulted with the MLD regarding the treatment of the human remains and funerary objects in compliance with California Public Resources Code, Section 5097.98. The MLD has recommended capping as a method to protect the remains of their ancestors. The landowner has agreed to comply with the MLD's recommendations. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I114-10:** This comment addresses the context of the resource sites in their totality. The City interprets this comment as the commenter suggesting that the archaeological sites present on the project site and the surrounding landmarks are eligible under Criteria C/3. The comment also suggests the local flora and fauna and landscape could be considered a “cultural landscape.” Cultural landscapes are defined as a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values per National Park Service Preservation Brief 36. There are four types of cultural landscapes. The City believes the type of cultural landscape suggested in the comment is an ethnographic landscape because they embody a variety of natural and cultural resources that associated people define as heritage resources (National Park Service Preservation Brief 36). Ethnographic landscapes are identified by the ancestral groups tied to those landscapes and are typically presented during consultation efforts for a project (e.g., AB 52 and or Senate Bill 18 consultation).

The City engaged in consultation for the proposed project with Barona. A summary of consultation efforts can be found in Section 4.4.1.3 of the EIR (Known Cultural Resources, Assembly Bill 52 Consultation) and in Confidential Appendix E3. Consultation with Barona

began in September 2018. The parties have agreed to the mitigation measures in the EIR and conditions of project approval to address the tribe's concerns. On July 9, 2020, Barona submitted a letter to the City to this effect, with some further changes to the conditions of project approval. On July 31, 2020, the City sent a response to Barona accepting such changes and stating that AB 52 consultation has concluded. Section 4.4.1.3 of the EIR has been updated to reflect this information.

During consultation with Barona, the project site was not identified in any communication as a cultural or ethnographic landscape (see Confidential Appendix E3, Page 5, and Section 4.4.1.3 of the EIR for a summary of consultation efforts). Ethnographic landscapes are viewed from a natural landscape and cultural landscape perspective. The native flora of the project site have been altered due to the introduction of non-native flora during the historical use of the project site for ranching (Confidential Appendix E2, Page 21) and modern recreational activities, which allows for the inadvertent introduction of non-native species (Biological Resources Technical Report [Appendix D], Page 71). Additionally, the topography has been altered due to unauthorized use, such as the development of off-road trails (Biological Resources Technical Report [Appendix D], Page 33) and the historical use as a ranch and quarry (Confidential Appendix E2, Page 29). In

1114-10  
cont. overlooking the San Diego river, Cowles mountain and Sycamore canyon, all important Kumeyaay cultural resources. The configuration of these important cultural landmarks makes this site historically significant not only because of criterion D41: "Has yielded, or may be likely to yield, information important in prehistory", but also because of criterion C: "Embodies the distinctive characteristics of a type, period, or region." In other words, it is the context of the site as a totality, on the hill overlooking the river, valley and mountain (which used to have a sacred site at its top, that was destroyed by the city of San Diego) as well as the trails that connected all of these places. As CEQA makes clear, archaeological sites may qualify as historic resources and are most often done so with reference to criterion D4, but many archaeological sites are denied this status because they are described as being without any context, being counted as "isolates" or having impaired stratigraphic context for various reasons. But in the case of Fanita Ranch, there appears to be plenty of evidence that it was a village, or maybe two villages, and so the case may be made that the many archaeological sites within 1 mile of the APE are most likely extensions of a single (or maybe two) "habitation centers," or villages. Viewed in this context, as historical sites according to criterion C, "embodies the distinctive characteristics of a type, period, or region," many of the 20 other smaller archaeological sites explored for the EIR could be considered eligible as historical resources. In other words, it is not just what may lie beneath them which makes them valuable as historical resources, but their contiguity- altogether, they constitute one large historical resource- a Kumeyaay village which was very likely inhabited right into the proto-historic period (EIR p. 25)

1114-11

1114-12 In addition to the two large sites there are approx. 20 other contiguous, smaller archaeological sites which the EIR labels "not eligible" for meeting the criteria for historically significant; but this is a matter of perspective. I am not an archaeologist, so what makes them significant to me is not what lies in the ground underneath them; it is the totality of the site, in its

<sup>1</sup> i.e. of the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852)

addition, the development of a power distribution line and Padre Dam Municipal Water District facilities have altered the line of sight from many cultural resources in the proposed project, including CA-SDI-8243. Therefore, the approach to address sites individually was proposed by the Secretary of the Interior Qualified Archaeologist and subsequently reviewed and approved by the MLD representative. The results and recommendations were reviewed and found to be agreeable to the consulting tribe, Barona.

**1114-11:** This comment makes the case for interpreting each archaeological site on the project site as an extension of one (or maybe two) habitation centers or cultural landscape. Known archaeological sites within the development footprint were evaluated using the federal and state criteria for evaluating cultural resources. This includes evaluation for eligibility according to criterion C/3 of the NRHP/CRHR. Site boundaries were drawn based on the distribution of artifacts and features and revised when appropriate. The archaeological sites in question are discrete localities and, therefore, were recorded as individual sites rather than one large habitation site because these areas are separated by natural landscape boundaries, such as changes in topography, or at minimum 100 feet of space void of archaeological resources. Of the sites evaluated, many possess ubiquitous exfoliated bedrock milling features

or lithic reduction localities that do not retain integrity and are not considered to be the embodiment of a type, period, or region. Several sites lack the necessary artifacts and ecofacts to date the sites to definitively identify them as being contemporaneous with other sites in the region (see Confidential Appendix E1, Page 27, Confidential Appendix E2, Page 67, and Section 4.4 of the EIR). See also response to comment I114-10.

**I114-12:** This comment concerns labeling resource sites on the project site as CRHR “eligible” or “ineligible.” This comment is addressed in response to comment I114-11.



I114-12 cont.	<p>overall context, which definitely illustrates “the distinctive characteristics” of the type, period and region of Kumeyaay life at the time of contact with Europeans.</p> <p>CA-SDI 8336: a milling station with 2 loci, containing 1 mortar, 9 slicks, and 1 cupule.</p> <p>CA-SDI 22180: a milling station with two granitic bedrock outcrops, each with one milling slick (grinding surface used to process flora and fauna) as well as cupules, or Cuyamaca ovals.</p> <p>CA-SDI-22181: one granitic bedrock outcrop with one slick.</p>
I114-13	<p>CA-SDI-22182 one granitic bedrock outcrop with one milling slick.</p> <p>CA-SDI-22184 one granitic bedrock outcrop with two slicks</p> <p>CA-SDI-22185 one granitic bedrock milling feature with one milling slick</p> <p>CA-SDI-22186 two granitic bedrock outcrops containing five milling features. One outcrop contains two milling slicks and the other contains three milling slicks. Atkins dug seven STPs here, and found cultural materials in 2 of them, but I do not know what since they are in the confidential appendix.</p> <p>The EIR states: “The low density of artifacts encountered at the site implies it was used for a limited time and for a limited range of activities. Based on the Phase II testing, CA-SDI-22186 is not eligible for listing in the NRHP, CRHR, or any local designation because it does not meet the eligibility criteria.” This is a particularly egregious example of how the definition of what makes a site</p>
I114-14	<p>“historically significant” may vary greatly based on perspective, i.e., whether the larger context is taken into account or not. The larger context, that this site CA-SDI-22186 is contiguous to what is apparently a large village, is critical to its classification, but this fact is conveniently ignored by the EIR.</p> <p>CA-SDI-22188: similar to CA-SDI-22186, this site, which has 36 lithic flakes on its surface, underwent extensive phase 2 testing, the results of which I do not have access to, but one of them the</p>
I114-15	<p>EIR tells me was a charcoal sample, which will allow them to date the site, so it is extremely valuable. However, the EIR states: “The low density of artifacts encountered at the site implies it was used for a limited time and for a limited range of activities. Based on the Phase II testing, CA-SDI-</p>

**I114-13:** This comment summarizes seven of the sites identified on the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I114-14:** This comment questions the eligibility recommendation of CA-SDI-22186 in the EIR. Site CA-SDI-22186 was evaluated against the research themes/questions identified in the Phase II testing plan for the proposed project (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-15:** This comment questions the eligibility recommendation of CA-SDI-22188 put forth in the EIR. Site CA-SDI-22188 was evaluated against the research themes/questions identified in the Phase II testing plan for the proposed project (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

I114-15 | 22188 is not eligible for listing in the NRHP, CRHR, or any local designation." I disagree with this statement based on the simple fact that it is contiguous to the two very large sites indicating a central habitation site, or village.

I114-16 | CA-SDI-5981: "This previously recorded site consisted of one utilized flake and one projectile point... originally recorded in 1980 by Richard Carrico. ... Atkins was unable to relocate this site during the 2016 survey and, therefore, did not recommend further testing. The site is not eligible for CRHR, NRHP, or local listing." Because they were not able to locate the site is *not* a reason to declare it is not historically significant, especially when it is contiguous to a very large site which IS.

I114-17 | CA-SDI-5985: This previously recorded site consisted of one pushplane and one side scraper originally recorded in 1980 by Richard Carrico. Atkins was unable to relocate this site during the 2016 survey. Similarly, Atkins declared this site "not eligible" for CRHR or NRHP. Because they were not able to locate the site is *not* a reason to declare it is not historically significant, especially when it is contiguous to a very large site which IS.

I114-18 | CA-SDI-8336: Cardenas (1983, cited in EIR) completed Phase II testing for the site and concluded it was not eligible for the CRHR because it did not contain significant data potential. It was revisited by Atkins who observed immediately east of the previously recorded polygon ... 7 bedrock milling features with 20 milling slicks and 3 basins. However, the EIR states: "...The integrity of the site is poor because a service road borders the area and burrowing animals have disturbed the subsurface integrity. Therefore, CA-SDI-8336 is not eligible for listing in the NRHP, CRHR, or any local designation." In my opinion, this is no reason to eliminate this site as a historical resource, as it is part of a larger site which IS.

I114-19 | CA-SDI-8341: This previously recorded resource is a collection of 10 milling slicks. This site was originally recorded in 1980. Atkins was unable to relocate the site during the 2016 survey and, therefore, did not recommend further testing. The EIR states: "The site is not eligible for CRHR,

**I114-16:** This comment concerns CA-SDI-5981, which was recorded as an isolated find and, therefore, was recommended as ineligible because isolated discoveries do not typically possess the criterion required for eligibility because their data potential is exhausted after the initial recordation; therefore, they are not considered significant resources under CEQA (see Confidential Appendix E1, Page 27). Additionally, the site is in an area of heavy grading and was likely destroyed after it was recorded in 1980 (Confidential Appendix E1, Page 49). Management considerations cannot be applied to a site that is no longer extant. This approach was recommended by the Secretary of the Interior qualified archaeologist and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-17:** This comment concerns CA-SDI-5985, which was recorded as an isolated find and, therefore, was recommended as ineligible because isolated discoveries do not typically possess the criterion required for eligibility. Additionally, the site is in an area of heavy grading and was likely destroyed after it was recorded in 1980 (Confidential Appendix E1, Page 49). Management considerations cannot be applied to a site that is no longer extant. This approach was recommended by the Secretary of the Interior qualified archaeologist and received concurrence from the MLD

and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-18:** This comment concerns CA-SDI-8336. Assessment of integrity is a standard procedure during a site evaluation. Site CA-SDI-8336 was evaluated against the research themes/questions identified in the Phase II testing plan (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-19:** This comment concerns CA-SDI-8341 and its eligibility recommendation. Management considerations cannot be applied to a site that is no longer extant. This approach was recommended by a Secretary of the Interior qualified archaeologist and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

I114-19 cont. NRHP, or local listing.” Because they were not able to locate the site is *not* a reason to declare it is not historically significant, especially when it is contiguous to a very large site which IS.

I114-20 CA-SDI-8342: Rincon (cited in the EIR) identified CA-SDI-8342 as a limited activity site that includes bedrock milling features and a shallow, low-density lithic assemblage, suggesting the site was likely used for resource processing and not long-term habitation. The EIR states: “Based on the Phase II testing, CA-SDI-8342 is not eligible for listing in the NRHP, CRHR, or any local designation.” Again, in my opinion, this is no reason to eliminate this site as a historical resource, as it is part of a larger site which IS.

I114-21 CA-SDI-8344: Franklin (cited in the EIR) recorded CA-SDI-8344 in 1980 as two bedrock outcrops with four slicks. Cardenas conducted Phase II testing in 1983. Based on the results of the testing program, Rincon concluded that CA-SDI-8344 is a limited activity site with a low-density subsurface component and exposed milling features on the surface. The EIR states: “CA-SDI-8344 is not eligible for listing in the NRHP, CRHR, or any local designation because it does not meet the eligibility criteria.” Again, in my opinion, this is no reason to eliminate this site as a historical resource, as it is part of a larger site which IS.

I114-22 CA-SDI-14686: This site, originally recorded by Gallegos and Associates in 1996 (cited in EIR), consisted of a sparse lithic scatter. In 1997, five post hole tests and four STPs were excavated, and all artifacts were collected: five lithic cores, two hammerstones, one hammerstone fragment, and an unspecified number of flakes. Six unspecified artifacts were located on the surface. The later survey by Atkins did not observe any remaining artifacts. The EIR states: “It appears that all data potential has been exhausted as the result of the previous investigations. Therefore, no additional testing is recommended, and the site is not eligible for CRHR, NRHP, etc. Again, in my opinion, this is no reason to eliminate this site as a historical resource, as it is part of a larger site which IS.

**I114-20:** This comment concerns CA-SDI-8342 and its eligibility recommendation. CA-SDI-8342 was evaluated against the research themes/questions identified in the Phase II testing plan (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-21:** This comment concerns CA-SDI-8344 and its eligibility recommendation. CA-SDI-8344 was evaluated against the research themes/questions identified in the Phase II testing plan (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-22:** This comment concerns CA-SDI-14686 and its eligibility recommendation. CA-SDI-14686 was evaluated against the research themes/questions identified in the Phase II testing plan (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

I114-23 CA-SDI-22503: Rincon identified this site as a prehistoric site. Four milling slicks and one basin were identified on four bedrock outcrops. ...The EIR states: "The low-density of artifacts encountered at the site implies the site was used for a limited period of time and for a limited range of activities. Site integrity is poor due to the unstable surface and bioturbation activity. Based on the Phase II testing, CA-SDI-22503 is not eligible for listing in the NRHP, CRHR, or any local designation because it does not meet the eligibility criteria. Again, in my opinion, this is no reason to eliminate this site as a historical resource, as it is part of a larger site which IS.

I114-24 In sum, in my professional opinion as a professor of American Indian Studies with a particular focus on California Indian history and especially Kumeyaay culture, I believe the Fanita Ranch site is unique in that it is particularly large, to date mostly untouched by development, and is located in an area where we know there was a lot of Kumeyaay habitation at the time of contact, based on the mission records. Section 21083.2 of the California Public Resources Code directly addresses the protection of unique archaeological resources under CEQA. A "unique archaeological resource" implies an archaeological artifact, object, or site about which it can be clearly demonstrated that there is a high probability that it meets one of the following criteria:

1. The archaeological artifact, object, or site contains information needed to answer important scientific questions and there is a demonstrable public interest in that information, or
2. The archaeological artifact, object or site has a special and particular quality, such as being the oldest of its type or the best available example of its type, or
3. The archaeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person. (CEQA 2020:38)

I believe the Fanita Ranch site meets *both* of the first two criteria. Relevant research topics that might be studied by protecting these sites and preventing development on Fanita Ranch include those suggested by Harris & Assoc. in the EIR (site chronology, dietary reconstruction and

**I114-23:** This comment concerns CA-SDI-22503 and its eligibility recommendation. CA-SDI-22503 was evaluated against the research themes/questions identified in the Phase II testing plan (Confidential Appendix E2). The evaluation was completed by a Secretary of the Interior qualified archaeologist. The recommendation was reviewed and received concurrence from the MLD and consulting tribe. See also responses to comments I114-10 and I114-11.

**I114-24:** This comment summarizes the opinions of the commenter. Each archaeological site was evaluated individually as a potentially unique resource. The MLD and consulting tribe have concurred with the findings and recommendations pertaining to archaeological resources. Although the City does not dispute the educational potential of the resources, the archaeological sites in question are on private property and are not required to be accessible to the public. The commenter's concerns regarding site selection, resource procurement, and use of surrounding plants shall be addressed in the data recovery efforts proposed as part of Mitigation Measure CUL-2 (Phase III Data Recovery Excavation Program) identified in the EIR. A study of place names shall be included in the data recovery mitigation efforts, addressing the commenter's concern. As previously stated, the subject property is privately held, and access for students is not required of the current landowner.

I114-24  
cont.

population health, paleo-environmental reconstruction and settlement patterns) but also just visiting the site would allow students to see and envision what pre-contact daily life was like in an actual Kumeyaay community location, to see where the river lies in relation to the bedrock mortar sites, to see Cowles mountain to the South with its solstice observatory at the top, to learn about the plants that are indigenous to the area that Kumeyaay people used for food, to make their baskets, homes and clothing from, as well as for medicinal purposes. Sycamore canyon also contains a uniquely red soil (possibly the “Distinct, reddish-brown topsoil [that] distinguishes ... gabbroic rock” discussed in the EIR section on geology 4.6-8) that Kumeyaay people traditionally used to make paint for ceremonial purposes, and the San Luis valley was also where a specific Kumeyaay placename was located which appears to refer to this red soil: *Cojuat* (or *kuxwatt* in contemporary Kumeyaay spelling) translating approximately to “the red one.” Students could also visit this site and learn about the traditional uses of this red earth. It is certainly possible that *Kuxwatt* was in fact the name of the Kumeyaay village on this proposed site, or perhaps it was just an important cultural resource that had its own name, located next to the village(s) in question. But if we are not allowed to continue to study these village sites we may never know which placenames (30 from the Valle San Luis alone) from the mission register refer to them.

I114-25

**References**

- Resource Management Plan for Sycamore Canyon & Goodan Ranch Preserve. San Diego County. 2013.
- Cultural Resources Technical Report for the San Diego River Trail- Carlton Oaks Golf Course Segment, Cities of San Diego and Santee, San Diego County, California. SANDAG. 2017.

**I114-25:** This comment includes references for the previous comments. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1114-25  
cont. | Sorenson, Steve. 1988. The Kumeyaay celebration of winter solstice  
Pictographs at Viejas Mountain, Cowles Mountain, La Rumorosa. San Diego Reader  
<https://www.sandiegoreader.com/news/1988/dec/22/cover-daggers-of-light-patterns-of-power/>

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## Comment Letter I115: Steve Foxover, July 12, 2020

**I115**

**I115-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Steve Foxover <sfoxover@gmail.com>  
**Sent:** Sunday, July 12, 2020 7:05 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I115-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Steve Foxover  
1905 Montilla St  
Santee, CA 92071  
sfoxover@gmail.com

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## Comment Letter I116: Janet Garvin, July 12, 2020

**I116**

**I116-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I116-2:** This comment states how the commenter found the EIR technical and confusing and asks what requirements or guidelines it follows. It is unclear what sections of the EIR the commenter found confusing. The table of contents provides a roadmap of the EIR, identifying all chapters, sections, subsections, figures, tables, and appendices. Chapter 1, Executive Summary, specifically Table 1-1, provides a summary of the impact analysis and conclusions contained in Sections 4.1 through 4.18 of the EIR and also provides Table 1-2 that compares the conclusions of the alternatives analysis presented in Chapter 6. In addition, Chapter 2, Introduction, provides the project overview, project background, purpose, and use of the EIR, EIR process, organization of the EIR, and documents incorporated by reference. The EIR was prepared in accordance with the California Environmental Quality Act (CEQA; California Public Resources Code, Section 21000 et. seq.) and the CEQA Guidelines, Section 15140, which states that an EIR

Chris Jacobs, Principal Planner Department of Development Services

Subject: Fanita Revised Draft EIR

I116-1

Thank you for the opportunity to comment on the Draft EIR for the Home Fed Fanita Ranch Project. Let me preface my comments by stating that I am a concerned resident of Santee and that I have lived in the Carlton Oaks neighborhood just southwest of the proposed project on Settle Rd. for 16 years. I am accustomed to the peace, quiet and the rural appearance of my neighborhood. I love seeing the Lakes when I drive by on Fanita Parkway as I do often, rarely encountering any traffic. My neighborhood gets really dark at night & I can usually hear the howling of coyotes to the north on the hill and northwest around Santee Lakes. I have wonderful neighbors here and this has been a charming area to live in.

I116-2

First of all, I know the EIR was not written for the lay person but I found it very technical and confusing. I have no experience with EIRs but I can't tell if this was written per any requirements or guidelines or was it meant to be obfuscating? Please explain.

I116-3

The length and detail of the EIR make it a difficult review for any individual so a group of colleagues & myself agreed to review different sections so we could assure a complete review. I committed to review the **Section 4.17 Utilities and Service Systems**. After reading the detailed explanation of the infrastructure requirements for water, waste water and electric, gas and telecommunications I found the following statements:

**For Water:** *However, to meet the demands of the proposed project, new and expanded facilities would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology/soils, paleontological resources, noise, and transportation. Therefore, impacts would be potentially significant.*

**For Waste Water:** *To meet the demands of the proposed project, new and expanded sewer facilities would be required to accommodate project development, the construction of which could result in physical impacts on the environment related to air quality, biological resources, cultural and tribal cultural resources, geology/soils, paleontological resources, noise, and transportation. Therefore, impacts would be potentially significant*

I116-4

**For Electric, Gas & Telecommunications:** Therefore, in order to meet the demands of the proposed project, new and expanded facilities would be required to accommodate the additional development, the construction of which could result in physical impacts on the environment related to air quality; biological resources; cultural and tribal cultural resources; geology, soils, and paleontological resources; noise; and transportation. **Impacts would be potentially significant.**

Specific impacts are not listed in this section but referenced to the individual sections cited such as air quality, biological, etc.

In addition, according to section 4.17.5.1 **"Implementation of the proposed project would require the construction of new and expanded water, wastewater, drainage, electric power, natural gas, and telecommunications facilities, some of which could cause significant environmental effects"** and effects would be **"Significant and unavoidable with respect to air quality, noise, and transportation impacts"**.

shall be written in plain language so that decision makers and the public can rapidly understand the document.

- I116-3:** This comment provides an introduction to the subsequent comments. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- I116-4:** This comment summarizes information disclosed in Section 4.17, Utilities and Service Systems, of the EIR regarding the proposed project's potential significant impacts. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

I116-5 So, am I correct in saying that **before any structure is built, irreparable damage to air quality, noise levels and traffic to our environment in Santee will have already occurred?**

I116-6 With regard to availability of water resources, I understand that water projection plans needs were made in 2015 projected to 2040 supposedly taking into account “single dry year” & “multiple dry year” scenarios. We have already experienced drought conditions in the last five years **without the demand of an additional 3000 homes**. Since we are near or in a climate crisis at this point, we are seeing rapidly increasing global temperatures and scientists are continuing to predict increasing heat & drier climates, are these projections adequate and realistic now?

I116-7 The City Council has committed to pursuing some plan for **Community Choice Energy**. While the plans have been delayed, have the electrical infrastructure plans for the Fanita Ranch project been reviewed for a fit with Community Choice Energy? Does this need to happen?

I116-8 In the Executive Summary Table 1.1 Proposed Project Environmental Impacts and Mitigation Measures I have noted that for Section 4.16 Transportation TRA9, TRA 10, TRA 13, TRA, 14, TRA 15, TRA, 16, TRA 19, TRA, 20, TRA 21, TRA 22 TRA 28, TRA 29, TRA 30 in each case that the developer **“is without jurisdiction to ensure the construction of the recommended improvements, and the impact to the roadway would remain significant and unavoidable”**. If the developer is without jurisdiction to implement a mitigation measure and cannot be held to that mitigation **in every case there is significant and unavoidable impacts to traffic!** Isn't this very misleading?

I116-9 According to the phasing of the project, as I understand it, construction will take approximately 15 years overall to complete. **Is this correct?**

I116-10 As I read this EIR, there will be significant unavoidable impacts to air quality (primarily dust), construction noise and truck and worker traffic (most directed to Fanita Parkway). My husband and I were looking forward to spending our retirement years in our home here on Settle Rd. As it stands, if this EIR is approved and the project moves forward we are looking at 15 years of dust, noise and traffic. It makes me think about whether I might want to relocate.

I116-11

I116-12 Just on the basis of the impact of the construction of the utilities and resources infrastructure alone, I strongly believe the DEIR should be rejected.

I116-13 It would be my preference that the property be preserved as it is. I am hopeful that the General Plan Initiative passes in November and the people have a chance to vote on developments that exceed General Plan Zoning limits. The decision of the City Council to not update the General Plan & instead vote on each project the way they do now places way too much power in too few hands and provides too much opportunity for corruption in my opinion.

Thank you for the opportunity to add my comments.

Janet Garvin  
Settle Rd.  
Santee, CA

**I116-5:** This comment asks if it is correct to assume that, before any structure is built, irreparable damage to air quality, noise levels, and traffic in the environment of the City of Santee (City) will have already occurred. It is unclear what the commenter means “before any structure is built.” Vegetation removal and grading would precede building construction; however, all of these activities are considered part of project construction. Impacts would occur from project construction and operation, as discussed throughout Chapter 4, Environmental Impact Analysis, of the EIR.

**I116-6:** This comment asks if the projections for water availability are adequate and realistic. Section 4.17.5.2, Threshold 2: Water Supply Availability, in Section 4.17 analyzes the potential impacts to water supply availability from implementation of the proposed project. A Water Supply Assessment (Appendix O3) was prepared to evaluate water supplies that are, or would be, available during normal, single dry year, and multiple dry years during a 20-year projection and to determine if the available water supplies meet existing, projected, and future water demands served by Padre Dam Municipal Water District, including the proposed project. The EIR concludes that the proposed project would increase the demand on water supply from Padre Dam Municipal Water District; however, sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development during normal, single dry year, and multiple dry years, and

impacts would be less than significant. This issue is adequately addressed in the EIR.

- I116-7:** The comment states the City’s commitment and plans to provide Community Choice Energy and asks if the electrical infrastructure plans for the project site have been reviewed for a fit with Community Choice Energy, also referred to as Community Choice Aggregation (CCA). Assembly Bill 117, which was signed into law in 2002, allows California cities to either individually or collectively supply electricity to customers within their borders through the establishment of a CCA. The CCA would allow the City’s energy users to choose an alternative option to San Diego Gas & Electric Company and use more renewable energy. CCA programs have renewable energy percentages between 33 and 100, and the national opt-out rates for the program range from 3 to 5 percent. The establishment of a CCA does not change the electrical infrastructure but allows the City to purchase electricity based on a renewable energy goal. More important to the proposed project is the on-site photovoltaic (PV) solar generation commitment. Mitigation Measure GHG-1 in Section 4.7, Greenhouse Gas Emissions, states that the proposed project shall provide on-site PV renewable energy generation with a total design capacity of at least 12.147 megawatts for the preferred land use plan with school, or 12.083 megawatts capacity for the land use plan without school, at full

buildout. The electrical utility lines feeding into the project site and the internal electrical lines distributed on the project site would be sized and designed to accommodate the required on-site PV solar generation.

- I116-8:** This comment states that, if the developer is without jurisdiction to implement a traffic mitigation measure and cannot be held to that mitigation, then a significant and unavoidable impact to traffic would occur. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. The City disagrees that the EIR is misleading. For every instance where a mitigation measure is not within the City's jurisdiction, the EIR clearly states that the impact would remain significant and unavoidable. However, a proposed condition of approval is the requirement that the applicant coordinate with adjacent jurisdictions to mitigate project impacts within their respective jurisdiction.
- I116-9:** This comment asks if the project construction will take approximately 15 years. Section 3.11, Conceptual Phasing Plan, describes the conceptual phasing timeline for the proposed project. Each phase would take approximately 2 to 4 years to complete. Construction is anticipated to begin in summer 2021 with a buildout of approximately 10 to 15 years.

- I116-10:** This comment states that there will be significant and unavoidable impacts to air quality, noise, and transportation from implementation of the proposed project. This is correct. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts, although not all impacts could be reduced to below a level of significance.
- I116-11:** This comment states the commenter's concern with living in the area during the construction phase of the proposed project. Refer to response to comment I116-10. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I116-12:** This comment states the commenter's opinion that the Draft EIR should be rejected does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I116-13:** This comment states the commenter's general opposition to the proposed project, is a closing comment, and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



## Comment Letter I117: Joyce Gorton, July 12, 2020

**I117**

**I117-1:** This comment states the commenter’s opposition to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Joyce Gorton <joycegorton@yahoo.com>  
**Sent:** Sunday, July 12, 2020 10:59 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

I117- I am against this project, that area needs to remain protected. Joyce Gorton  
1

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## Comment Letter I118: Retha Knight, July 12, 2020

**I118**

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**From:** Retha Knight <retha\_knight@yahoo.com>  
**Sent:** Sunday, July 12, 2020 12:16 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

I118-1 Fanita Ranch does not follow Santee's general plan and was already voted down by Santee citizens years ago.  
1 Since then, fire danger and traffic are at an all-time high and the cumulative effects of this and other  
developments are not properly mitigable. The checkerspot butterfly and other endangered animals and plants  
I118-2 would be destroyed by this oversized development. Vistas will be forever gone. Air quality will be even  
2 worse!

I118-3 Even with 30 prescribed mitigation measures, "impacts to [6] intersections, [5] street segments, and [2]  
3 freeway mainline segments would remain significant and unavoidable." [RDEIR 4.16-100]

I118-4 Santee's heavily impacted circulation network will be significantly more vulnerable during wildfire emergency  
4 evacuation!

I118-5 How do you mitigate the fact there's only one route going directly west from Santee- to beaches and to connect  
5 with the 15, the 805 and the 5? These routes are already hopelessly overcrowded in normal times!

I118-6 The "Federally listed California gnatcatcher" abound on Fanita. Surveys in 2016 identified 39 pair and 42  
6 individuals on designated Critical Habitat. Why trade endangered species for traffic?

I118-7 Critical Habitat for the Endangered Hermes copper butterfly, Willoway Monardella and California gnatcatcher  
7 on Fanita. Yes - it's almost all critical for one of these species.

I118-8 Let's plan Santee the right way: develop the valley, not the natural hillsides.  
8 No Fanita Ranch!!!!

Thanks,  
Retha Knight  
92071

**I118-1:** This comment states that the proposed project does not follow the Santee General Plan and was voted down by Santee citizens. As stated in Section 3.12, Discretionary Actions, in Chapter 3, Project Description, in the EIR, the proposed project would require approval of a General Plan Amendment to allow for 2,949 units on the project site. The result of past votes related to former projects does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I118-2:** This comment states that fire danger and traffic are at an all-time high and that the cumulative effects are not properly mitigated. Section 4.18, Wildfire, analyzes the potential direct and cumulative impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the project-specific Fire Protection Plan and Construction Fire Prevention Plan, which are included as Appendix P1, and the Wildland Fire Evacuation Plan, which is included as Appendix P2. Section 4.18 also references information provided in the will serve letters provided by the Santee Fire Department provided in Appendix M. The EIR concludes that the proposed project would have a less than significant

impact on wildfire safety. This issue is adequately addressed in the EIR.

Section 4.16, Transportation, analyzed the potential for the proposed project to result in direct and cumulative impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

This comment also states the Quino checkerspot butterfly (*Euphydryas editha quino*) and other endangered animals and plants would be destroyed. Section 4.3, Biological Resources, and Appendix D, Biological Resources Technical Report, fully analyze potential impacts to sensitive plant and wildlife species, including Quino checkerspot butterfly. The EIR concluded impacts to sensitive plant and wildlife species would be reduced to a less than significant level with mitigation incorporated. This issue is adequately addressed in the EIR.

This comment also states vistas will be gone forever. Section 4.1, Aesthetics, analyzes the potential visual impacts of the proposed project from 16 key public viewpoints. Specifically, Section 4.1.5.1, discusses the proposed project's impacts on public scenic vistas. The EIR concluded that the proposed project would result in less than significant impacts to public scenic vistas. This issue is adequately addressed in the EIR.

This comment also states that air quality will be even worse. Section 4.2, Air Quality, analyzes the potential for impacts to air quality due to implementation of the proposed project and recommends mitigation measures to reduce or avoid adverse impacts. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to air quality, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

**I118-3:** This comment summarizes information disclosed in the EIR that, even with the mitigation measures, traffic impacts would remain significant and unavoidable. No further response is required.

**I118-4:** This comment states that the City of Santee's heavily impacted circulation network will be more vulnerable during wildfire emergency evacuation. Section 4.18,

Wildfire, analyzes the potential direct and cumulative impacts of increased wildfires and evacuation that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (Appendix P1 and the Wildland Fire Evacuation Plan (Appendix P2). The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR. Please also refer to the Thematic Response – Evacuation.

- I118-5:** This comment asks how roadway access moving west can be mitigated when the freeways are already overcrowded. See response to comment I118-4, which addresses the same issue. No further response is necessary.
- I118-6:** The comment expresses concern with the proposed project's impacts to the coastal California gnatcatcher (*Polioptila californica californica*). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. Nonetheless, as discussed in Section 4.3, Biological Resources, impacts to the coastal California gnatcatcher would be reduced to less than significant through implementation of the following: Mitigation Measure BIO-1, which would conserve 1,017.61 acres of suitable habitat; Mitigation Measure BIO-2, which would restore

45.54 acres of temporary impacts to suitable habitat areas; Mitigation Measure BIO-14, which would require preconstruction nesting bird surveys in suitable habitat; and Mitigation Measure BIO-17, which would remove brown-headed cowbird (*Molothrus ater*) from the project site.

- I118-7:** The comment lists species with USFWS-designated Critical Habitat on the project site, including the Hermes copper butterfly (*Lycaena hermes*), willowy monardella (*Monardella viminea*), and coastal California gnatcatcher. The comment correctly states that the project site contains USFWS-designated Critical Habitat for willowy monardella and coastal California gnatcatcher. However, USFWS has only proposed Critical Habitat for the Hermes copper butterfly. Potential impacts to these species and habitat that supports these species is addressed in Section 4.3.5, Project Impacts and Mitigation Measures.
- I118-8:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I119: Sandy Kuntz, July 12, 2020

**I119**

**From:** Sandela Kuntz <sandykuntz@yahoo.com>  
**Sent:** Sunday, July 12, 2020 11:57 AM  
**To:** Chris Jacobs  
**Cc:** John Minto; Stephen Houlahan; Laura Koval; Rob McNelis; Ronn Hall  
**Subject:** Fanita Revised Draft EIR

Dear Mr Jacobs, Principal Planner of Santee,

As I was canvassing all areas of Santee during a recent election - from the condos by Mission Trails to the neighborhood near Lakeside where our former mayor lived - I kept hearing **one main theme** from Santee citizens: They do not want the Fanita Ranch development.

1119-1 The comments: **"I thought we already settled that, and the vote was no."** "That is a significant fire danger." "It is too hard to get to work with all the traffic now." **"No, we don't need to be building in the hills, just keep the new homes in the valley."** "No on Fanita Ranch."

Now, as a Santee citizen and homeowner and taxpayer of over 20 years, I am reading the **EIR for Fanita Ranch**. I have questions:

1119-2 1) Santee citizens passionately appreciate that Santee has a country feel, including development contained primarily to the valley, while the natural hillsides surround our town and provide a beautiful vista and natural beautiful boundary. This aesthetic value of this Santee treasure is impossible to be mitigated. With just this one point, the Fanita Ranch development should not move forward.

1119-3 2) Does the EIR mitigate for traffic using current traffic maps? If not, why not? Traffic has increased.

1119-4 2b) It appears that the traffic impact does not include the 415-unit Weston development even though this is located on Mast and is extremely significant to the EIR traffic findings. Please explain.

1119-5 3) I live in western Santee. How specifically do you plan to mitigate for traffic during construction and afterwards at West Hills Parkway and Mission Gorge Road, and also at Carlton Hills Road?

1119-6 4) The cumulative traffic in Santee will be significantly higher, contributing to cumulatively higher pollution, effectively increasing asthma and other health issues for citizens. (Family members have asthma.) How is this acceptable for Santee citizens, or how will this health impact be addressed?

1119-7 5) How specifically will you mitigate the destruction of habitat for over 20 mammal species, 100 avian species, 21 reptiles/amphibians, and the native flora? What lands will be used for mitigation? Do they have the same wildlife value? Is there a mitigation plan to help endangered insects and invertebrates that will actually allow these species to survive and thrive, and how can we know that the property will be ultimately protected and a workable habitat for these endangered species?

1119-8 5B) Are mitigation lands public or private property? How will that work?

**I119-1:** This comment provides opinions of the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I119-2:** This comment states the aesthetic value of Santee is impossible to be mitigated. Section 4.1, Aesthetics, analyzed the potential visual impacts of the proposed project from 16 key viewpoints. Specifically, Section 4.1.5.3, discusses the proposed project's impacts on visual quality and character and landform alteration. The proposed project would alter the existing aesthetic characteristics of the project site, as well as alter the existing landform in certain areas from a variety of vantage points in the City of Santee (City) and adjacent areas. To protect and manage hillsides and topographic resources, the City has adopted hillside development guidelines as described in Table 4.1-1, City of Santee Hillside Development Guidelines. The large cut and fill slopes on the project site, as identified on the Vesting Tentative Map, that are visible from the public rights-of-way would use landform grading techniques to recreate and mimic the flow of natural contours and drainages in the natural surroundings. Where development is proposed on hillsides, grading would be efficient to

minimize the grading footprint. Special contour grading techniques would be used at edges and transitions in landform. During construction, these slopes would be temporarily devoid of vegetation; however, they would be revegetated and landscaped in compliance with the Santee Municipal Code, Chapter 12.26, Landscape and Irrigation Regulations, and the Guidelines for Implementation of the City of Santee Water Efficient Landscape Ordinance (2017). By complying with the policies in the Santee General Plan and the requirements of the Santee Municipal Code, as well as adhering to the guidelines set forth in the Fanita Ranch Specific Plan, the EIR concludes that the proposed project would not degrade the existing landscape from a public viewpoint. This issue is adequately addressed in the EIR.

- I119-3:** This comment asks if the EIR mitigates for traffic using current traffic maps. It is unclear as to what the commenter meant regarding “current traffic maps”. It is possible they meant “traffic counts”. The baseline traffic counts identified in the Transportation Impact Analysis (Appendix N) were conducted in 2018 when area schools were in session. There has been little new development in Santee since these counts were conducted and where new development did occur, those volumes are captured in the cumulative project traffic volume forecasts. Traffic from 55 near term cumulative projects was included on top of the existing volumes to

account for new development within not only the City of Santee, but also other nearby jurisdictions. Also refer to EIR Section 4.16, Transportation.

- I119-4:** This comment states the traffic impact does not include the 415-unit Weston development. This statement is false. The Weston development was included in the Transportation Impact Analysis (Appendix N) as a cumulative project. Data from that project is included in Table 4-2, Cumulative Projects, of the EIR (project #19). Therefore, the traffic from the Weston project was adequately addressed in the EIR.
- I119-5:** This comment asks how construction and operation traffic will be mitigated at West Hills Parkway, Mission Gorge Road, and Carlton Hills Road. The recommended mitigation measures for the West Hills Parkway/Mission Gorge Road intersection is Mitigation Measure TRA-15 in Section 4.16 of the EIR and mitigation at the Mission Gorge Road/Carlton Hills Boulevard intersection is Mitigation Measure TRA-16.
- I119-6:** This comment states cumulative traffic in Santee will be significantly higher, contributing to cumulatively higher pollution, effectively increasing asthma and other health issues for citizens and ask how health impacts will be addressed. Section 4.2.5.3, Air Quality, Threshold 3: Sensitive Receptors, details the results of a Health Risk Assessment (Appendix C2) completed for the proposed project, which analyzed the risk of health problems from

exposure to toxic air contaminants during construction to future residents within the proposed project and impact of the proposed project to existing City residents. The study found the maximum increases in non-cancer risk (including asthma) would be below the threshold and impacts would be less than significant. Mitigation Measures AIR-3, AIR-4, AIR-11, and AIR-12 would be required to reduce residential cancer risk during construction and operation of the proposed project. In addition, under Threshold 3, Assessment of Project Operational Impacts, discusses the potential health effects as a result of the of the operation of the proposed project and further explains in detail why it is not feasible to provide such a meaningful assessment of potential health impacts from operational emissions.

- I119-7:** The comment asks a series of questions regarding the types of mitigation measures that will be implemented for impacts to biological resources. Refer to Section 4.3.5, Project Impacts and Mitigation Measures, which provides 23 mitigation measures that would reduce impacts to biological resources to less than significant. These measures include Preserve Management Plan (BIO-1), Upland Restoration Plan (BIO-2), Narrow Endemic Plant Species (BIO-3), Oak Tree Restoration Plan (BIO-4), Preconstruction Surveys and Avoidance and Minimization Measures for Special-Status Plant Species (BIO-5), Land Use Adjacency Guidelines (BIO-6), Stormwater Pollution Prevention Plan (BIO-7), Approved Biologist (BIO-8), Habitat Preserve Protection

(BIO-9), Weed Control Treatments (BIO-10), Argentine Ant Control and Monitoring (BIO-11), Vernal Pool Mitigation Plan (BIO-12), Western Spadefoot Relocation (BIO-13), Nesting Bird Survey (BIO-14), Wetland Mitigation Plan (BIO-15), Coastal Cactus Wren Habitat Management (BIO-16), Brown-Headed Cowbird Trapping (BIO-17), Restoration of Suitable Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly (BIO-18), African Clawed Frog Trapping (BIO-19), Wildlife Protection (BIO-20), Fire Protection Plan (BIO-21), Wildlife Corridor (BIO-22), and Wildlife Undercrossings (BIO-23). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- I119-8:** The comment asks if mitigation land will be public or private, and how this would work. The process is discussed within the Preserve Management Plan (Appendix P to the Biological Resources Technical Report, which is Appendix D to the EIR). The Habitat Preservation of on-site open space requires recordation of a Habitat Preserve conservation easement. The Habitat Preserve would be owned, conserved, and managed in perpetuity through the Preserve Management Plan by a Habitat Preserve management entity with a funding mechanism approved by the City in accordance with applicable regulations.

1119-9 6) Fire danger will likely increase from further human encroachment and traffic. How will you protect not only the homes and also the buildings, but also the flora, fauna the natural habitat, from increased fire danger?

1119-10 7) How will residents of Santee like myself be able to breathe fresh air **during construction** with the resulting truck and building pollution? How will worse air pollution and aggravated asthma and other illnesses be mitigated?

1119-11 8) City Planner, can citizens be assured that HomeFed will continue with the improvements in traffic and roads after they have received their moneys? Why would that be in their interest? What legal agreements will insure this and are they in place? My experience with developers in Santee is that after they build their project, **developers no longer stick around to complete** the "agreed-upon" improvements and maintenance.

1119-12 9) Most importantly, as City Planner, are you protecting the City's General Plan, as it is written? If not, why not?

1119-13 I fell I am writing not only for myself but for the hundreds of Santee citizens I talked to while canvassing, who do not know about the EIR and who do not know that the northern natural hills of Santee are again threatened by the deeply unpopular Fanita Ranch.

Thank you for the opportunity to provide questions and comments on the Fanita Revised Draft EIR.

Sincerely,

Sandy Kuntz  
Santee Citizen

**I119-9:** The comment suggests that fire danger will likely increase due to humans and traffic and questions how the proposed project structures and the natural environment will be protected. As detailed in the project-specific Fire Protection Plan (Appendix P1), a comprehensive fire protection system has been designed to protect the proposed project, but that also protects the natural environment by minimizing potential for accidental ignitions and creating wide, maintained buffers between the proposed project and the natural areas. Maintenance would be performed by the funded homeowners association that is a condition of the proposed project's approval. Please refer to the Thematic Response – Fire Protection and Safety and Thematic Response – Fire Ignition and Risk for responses to the comment's questions regarding fire danger, protection of homes and buildings and that natural fire habitat. This issue is adequately addressed in the EIR.

**I119-10:** This comment asks how City residents will be able to breathe fresh air during construction with the resulting truck and building pollution and asks how air pollution and aggravated asthma and other illnesses will be mitigated. Please refer to response to comment I119-6 which addresses the same issue as this comment.

**I119-11:** The comment questions what mechanism is in place to assure that HomeFed Fanita Rancho, LLC (HomeFed),

will complete all improvements. The Mitigation Monitoring and Reporting Program (CEQA Guidelines Section 15097; Public Resources Code Section 21083) and Conditions of Approval are legally binding documents to assure that all improvements are implemented in accordance with the triggers contained in the mitigation measures or the conditions, respectively. HomeFed will be required to enter into Subdivision Improvement Agreements with the City for all of the required public improvements. The agreements will be secured by acceptable securities provided by HomeFed to assure the completion of the improvements. This comment does not raise a significant environmental issue regarding the accuracy or adequacy of the information provided in the EIR. No further response is required.

**I119-12:** This comment questions the role of the City Planner. This comment does not raise a significant environmental issue regarding the accuracy or adequacy of the information provided in the EIR. No further response is required.

**I119-13:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I120: Robert Laudy, July 12, 2020

**I120**

**From:** Robert Laudy <rldudy@yahoo.com>  
**Sent:** Sunday, July 12, 2020 3:31 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR - Comments

Mr. Chris Jacobs, Principal Planner  
 Department of Development  
 Santee City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, CA 92071  
 cjacobs@cityofsanteeca.gov via electronic delivery

Dear Mr Jacobs,

- I120-1 I am writing as a San Diego County resident, concerned citizen, and board member of the Friends of Goodan Ranch & Sycamore Canyon to oppose the plan and EIR for the Fanita Ranch project.
- I120-2 The proposed project, adjacent to Mission Trails Regional Park (MTRP), MCAS Miramar, and Sycamore Canyon Goodan Ranch Preserve, will cause a major degradation of accomplishments of the Multiple Species Conservation Program (MSCP). Many species of plants and animals as well as wildlife corridors in the region will be forever diminished. Our chaparral, coastal sage scrub, and vernal pool habitats support many rare and special species like the Quino Checkerspot, California Gnatcatcher, San Diego Fairy Shrimp, and Willoway Monardella. Cooper's Hawk, Rufous-crowned Sparrow, Oak Titmouse, Least Bell's Vireo, and Hermes Copper and many others. The Fanita Ranch project would severely impact all of them. The proposed mitigation is totally unsatisfactory; in fact adequate mitigation is likely impossible.
- I120-3 It is vastly important to wildlife in the region to maintain undeveloped corridors, as outlined in the MSCP. The location of Fanita Ranch is pivotal for these corridors just east of our "developed county". Sycamore Canyon, Goodan Ranch, MCAS Miramar and Mission Trails North are vital connectors to the San Diego River and MTRP.
- I120-4 Increased commuter traffic on Hwy. 52 will be atrocious. Many Santee streets, and travel through the Mission Gorge Road corridor through San Diego will impact many drivers, bicyclists, pedestrians and residents on a daily basis.
- I120-5 Fire hazard will be extreme if this project is approved. Hemmed in on three sides with open space may sound charming to house hunters, but not during a Santa Ana wind advisory. Homeowners will likely demand more "fire prevention" measures, like brush thinning and clearing from the surrounding County open spaces as well as the ranch property, itself, further diminishing the MSCP objectives. Evacuation traffic would be a nightmare during a fire, at best.
- I120-6 I see that the Fanita Ranch website touts access to the Stowe Trail to reach Sycamore Canyon Preserve. The Stowe Trail is on MCAS Miramar property. The Marines currently allow access only to registered permittees. In the past the Marine commandant has denied access to all civilians and could do so again at any time. Residents of a new Fanita Ranch development would likely demand more trails through Sycamore Canyon, which would further harm the preserve's wildlife and habitat.
- I120-7 Also touted in the Ranch's literature is the open space they are allocating in the development. This is mostly a sales pitch. Included are developed community parks and "working farms" and "35 miles of hiking trails". Those are not truly open space in an environmental sense and is not mitigation for planned habitat destruction.

**I120-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I120-2:** The comment suggest that the proposed project will cause a major degradation of accomplishments of the Multiple Species Conservation Program (MSCP). Please refer to Thematic Response – Santee MSCP Subarea Plan for a response to this comment. The comment also mentions many species that are addressed in Section 4.3, Biological Resources, and the Biological Resources Technical Report (Appendix N), and suggests that the mitigation is not adequate to address these impacts. However, the commenter does not explain what makes them think the mitigation is not adequate. Therefore, no further response is required. Nonetheless, the City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation measures would reduce all biological resources impacts to a less than significant level.

**I120-3:** The comment states that it is important to wildlife to maintain undeveloped corridors per the MSCP and that

the project site is pivotal for these corridors due to its location. Please refer to Thematic Responses for Wildlife Movement and Habitat Connectivity and the Santee MSCP Subarea Plan for responsive information. No further response is required.

- I120-4:** This comment states commuter traffic on SR-52 will be impacted by many more drivers, bicyclists, pedestrians, and residents on a daily basis. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to SR-52 and identifies Mitigation Measures TRA-29 and TRA-30 to reduce those impacts. Per the explanation in Section 4.16.5, Project Impacts and Mitigation Measures, the applicant has privately funded the SR-52 PSR-PDS, with an attachment included in the appendix to the Transportation Impact Analysis (Appendix N). Per the SR-52 PSR-PDS included in Appendix N, the applicant has entered into an agreement with Caltrans to identify operational improvements to SR-52 that are intended to relieve congestion. This issue is adequately addressed in the EIR.
- I120-5:** This comment states that fire hazard and evacuation will be extreme if the proposed project is approved and speculates that homeowners may seek additional fire prevention measures resulting in impacts to surrounding County open spaces. Section 4.18, Wildfire, analyzes the potential wildfire impacts that may result from the

construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan, which are included as Appendix P1, and the Wildland Fire Evacuation Plan, which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will serve letters provided by the Santee Fire Department provided in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. Such conclusion is not dependent on, nor does the project require, additional fire prevention measures for existing development or adjacent open space areas. Thus, there would be no additional impact to “County open spaces,” and any potential impacts from the proposed project related to the MSCP have been fully analyzed in Section 4.3.5.6 (Habitat Conservation Plan). This issue is adequately addressed in the EIR.

- I120-6:** This comment refers to content provided on the proposed project website and states that the Stowe Trail is on MCAS Miramar property. This statement is not entirely correct because there are portions of the Stowe Trail on and off MCAS Miramar property. The EIR does not rely on statements provided on the proposed project website. The comment also suggests that the proposed project will demand more trails through Sycamore

Canyon, which would further harm the preserve's wildlife and habitat. Section 4.15.5.1, Threshold 1: Deterioration of Parks and Recreational Facilities, in Section 4.15, Recreation, discusses the proposed trail connections to the existing Goodan Ranch/Sycamore Canyon County Preserve. As stated in this section, the proposed project would provide over 35 miles of trails (23 acres) and would comply with the Santee Municipal Code. Trail locations throughout the project site would be coordinated to minimize conflicts with sensitive habitat areas by using existing trails and dirt roads and providing signage, well-defined trail markers, fencing, and community education to protect habitat areas. Trails would be managed in accordance with the Fanita Ranch Public Access Plan (Appendix T of the Biological Resources Technical Report (EIR Appendix D)). The EIR acknowledges that, while project residents may use existing Neighborhood and Regional Parks or other recreational facilities, they would also be expected to use the on-site recreational amenities due to convenience and variety. Therefore, substantial physical deterioration of the existing recreational facilities would not be expected to occur or be accelerated. Impacts would be less than significant.

In addition, Sections 4.3.5.1 and 4.3.5.2 in Section 4.3 analyze the potential indirect impacts to sensitive plants, wildlife, and habitats and edge effects associated with the

proposed project. The EIR concludes that the proposed project would not result in significant indirect impacts to sensitive biological resources with mitigation incorporated. This issue is adequately addressed in the EIR.

- I120-7:** This comment refers to statements made in “the Ranch’s literature” and provides the commenter’s opinion about the project. It is not clear what source of information the commenter is referring to. As stated in Chapter 3, Project Description, the proposed project would include community parks, a Farm, and 35 miles of trails as project features. The comment further states that these project features are not mitigation for habitat impacts. This portion of the comment is correct. The proposed recreational project features are not considered mitigation for impacts to habitat. Based on the opinions of the biological experts who prepared the analysis, the impacts to biological resources from the proposed project would be fully mitigated to a less than significant level with implementation of mitigation measures BIO-1 through BIO-23 (see EIR Section 4.3, Biological Resources). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

1120-8 The bottom line is this development is not good for the residents of Santee, not good for the residents of San Diego County and certainly not good for the wildlife of the region that depend on the goals of the MSCP to remain viable and healthy. The EIR is drastically deficient due to significant adverse impacts to biological resources, fire safety, climate, and traffic impacts.

Thank you,  
Robert Laudy  
Friends of Goodan Ranch & Sycamore Canyon Open Space

**I120-8:** This comment states that the proposed project is not good for residents and not good for wildlife that depend on the goals of the MSCP. Further, this comment states that the EIR is deficient due to its significant adverse impacts to biological resources, fire safety, climate, and traffic impacts. Please refer to Thematic Response – Santee MSCP Subarea Plan for a response to this comment regarding the goals of the MSCP. Section 4.3, Biological Resources; Section 4.18, Wildfire; Section 4.7, Greenhouse Gas Emissions; and Section 4.16, Transportation, analyze the impacts of the proposed project on biological resources, fire safety, greenhouse gas emissions, and traffic, respectively and identify appropriate mitigation to mitigate those impacts to the extent feasible in accordance with the CEQA Guidelines, Section 15126.4.

## Comment Letter I121: Michael Ranson, July 12, 2020

July 12, 2020  
To: Chris Jacobs, Principal Planner  
Subject: Fanita Revised Draft EIR  
Department of Development Services  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071  
Email: cjacobs@cityofsanteeca.gov

Mr. Jacobs,

I want to comment on the concern that the Fanita Ranch development will negatively impact or destroy the native habitat of multiple species of plants, mammals, birds and insects. I have been thinking quite a bit about this given that I live directly across from the Castle Rock, or now Weston, community. I remember so many residents that absolutely hated this project. For years, I looked across to the hillside above Santee Lakes and considered it just a dry slope of brown dead grasses and shrubs barely able to survive for lack of water and nutrients.

When the first Weston homes were built, my wife and I started hiking the mile long Weston Trail that was part of the mitigation for that development. It did not start out as a mile long trail but it is just about complete today. Each time I hike this trail I wonder to myself if the development of this area destroyed the native environment or enhanced the native environment and possibly made it better than it was? The other day, my wife and I met a woman and her child on the trail. As we said hello, she asked if we lived in Weston. I replied with a no and said we just like to hike here. She responded with, "Me either. I live down below (on Pebble Beach Drive) and at first we hated this project being built but it's beautiful what they've done and I can't wait to take my son to the park when it opens." With that we continued our hike.

This morning I began to think about that short conversation on the trail. That mile long trail is beautiful and filled with native grasses, shrubs and

**I121**

**I121-1:** This comment contemplates whether new development enhances or destroys the environment and expresses appreciation of the trail constructed by the Weston project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

I121-1

I121-1

trees. There are dozens if not more of young California sycamores, native oaks and other trees. There are large plantings of native sages and other native flowers. There are birds and bees all over. You can spot red tailed hawks in the afternoon near Weston Park. All of these new native plants were planned mitigation and are now maintained by HOA fees with all the recycled water and nutrients they need. It's great, but is it as good or better than what was "destroyed" by this development? Does nature know that its environment was purposely planned and is cared for by man in order to mitigate the very real need of housing for our region? In short, does nature care that their habitat is man-made?

I spent a couple hours on the Weston Trail this morning after thinking about this. Is it possible that this one mile of trail represents a small amount of what we might expect on the 36 miles of the planned trails of Fanita Ranch inside the 76% open space that will be preserved forever? Rather than describe my experience, I thought I'd share photos that I took while on the Weston Trail this morning.

Consider that most all of the green in these photos is deliberately planned mitigated native habitat. Ask yourself if this mitigated area is destroyed or enhanced and does the wildlife care that this was created for them by the developer?

Sincerely,

Michael Ranson

Santee Resident / Strathmore Drive

619-977-1121



I121-2



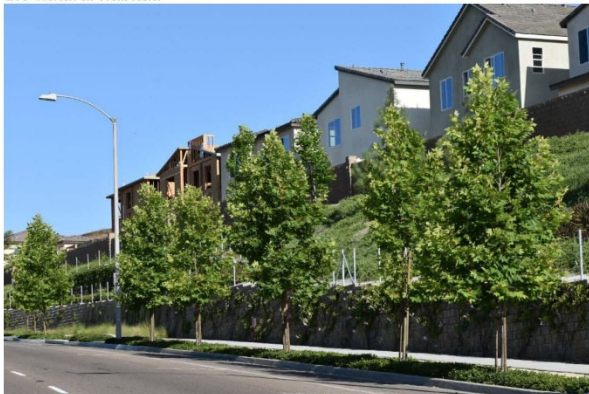
I'll begin at the end. This is the existing end of the Weston Trail that is pending completion. You can see the wood post fence along the trail and the new plantings. The natural habitat is to the right and above the trail in this photo. This is what the hillside looked like for as long as I can remember. The trees in the foreground are on the Santee Lakes Preserve and Campground.

**I121-2:** This comment includes photographs of the trail built by the Weston project with descriptions provided as an attachment by the commenter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

I121-2  
cont.



The Weston Trail from a distance. Native plantings on the slope below the homes beginning to fill in. The dry brown area above the homes is the natural habitat.



California sycamores along Mast Blvd near the start of the trail.

1121-2  
cont.



California sycamores along Mast Blvd near West Hills HS



100% of this green habitat is planned and maintained by Weston.

1121-2  
cont.



I121-2  
cont.



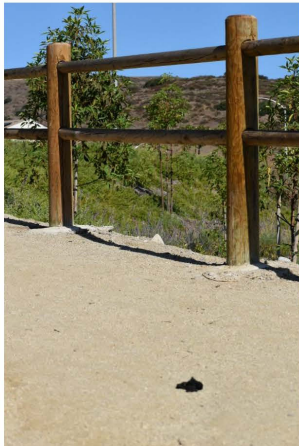
Green slope in the foreground with natural hills behind. All trees and shrubs planned, planted and maintained by Weston.



1121-2  
cont.



I121-2  
cont.



A Coyote was here---scat on the Weston Trail

1121-2  
cont.





I121-2  
cont.



I121-2  
cont.



1121-2  
cont.



A rabbit near Weston Park

1121-2  
cont.



California sycamores and native grasses within Weston



Oaks and native grasses within Weston

1121-2  
cont.



1121-2  
cont.



1121-2  
cont.



Open space within Weston. During the rainy season, this area becomes a small pond that is filled with ducks and other water birds. The land on the left and beyond the grassy area is planted with additional native plants and watered with recycled water. Has this been destroyed or enhanced by the development?

1121-2  
cont.



Natural rocks meet the boulders brought in by development to manage a stream the flows during the rainy season.



1121-2  
cont.



Bees have built a home under one of the boulders placed here by Weston.



I121-2  
cont.



1121-2  
cont.



A frog in the dry creek drainage created by Weston



I121-2  
cont.



Destroyed?



Mitigated and enhanced?

## Comment Letter I122: Michael Ranson, July 12, 2020

**I122**

**I122-1:** This comment provides a photograph of a sound wall at Fanita Parkway and Mast Boulevard. The commenter intends to illustrate that high walls like this example are possible in the City of Santee, although not common. Section 4.12, Noise, specifically Section 4.12.5.1, (under heading Permanent Increase in Vehicle Noise), in the EIR states that noise walls up to approximately 20 feet in height in the roadway right-of-way would be required on the eastern side of Fanita Parkway to break the line of sight and provide noise attenuation at adjacent receptors. At these heights, noise walls would be visually incompatible with the surrounding community and above the Caltrans and City of Santee’s Zoning Ordinance noise wall height limits. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Michael Ranson <michaellranson@gmail.com>  
**Sent:** Sunday, July 12, 2020 8:29 PM  
**To:** Chris Jacobs  
**Subject:** Fwd: Comments for Fanita Ranch DEIR  
**Attachments:** Ranson Fanita Ranch DEIR Comment Letter 7-10-20.pdf; MLR\_3896.JPG

Hi Chris,

Sorry for this but I would like to add this photograph to the comments I sent over on Friday. That email and attachment are below. If you would also please include this photo (also attached) of a sound wall at Fanita Parkway and Mast Blvd I would appreciate it. It is clearly over the 8 foot height mentioned in the DEIR for Fanita Ranch. I think it illustrates that high walls like this are possible in Santee, although not common, as this one has been standing for over a decade.

Thanks very much,  
 Michael Ranson

----- Forwarded message -----

**From:** Michael Ranson <michaellranson@gmail.com>  
**Date:** Fri, Jul 10, 2020 at 4:42 PM  
**Subject:** Comments for Fanita Ranch DEIR  
**To:** <cjacobs@cityofsanteeca.gov>, <jminto@cityofsanteeca.gov>, Laura Koval <LKoval@cityofsanteeca.gov>

I122-1

Hello Chris,

First of all---thank you! You were a great help to me in understanding the basics of how to read, understand and comment on the Fanita Ranch DEIR. I am supportive of the project and think that it will be great for Santee. I hope that it gains the support of the City Council when it is proposed.

Second---I do have some concerns that are minor to the project overall but huge to my own quality of life in this great city. Please see my comment letter attached.

I have CC'd Mayor Minto and Vice Mayor Koval as an FYI that I will follow up on in the future.

Have a great weekend!  
 Michael Ranson, ASID  
 619.977.1121  
[www.michaelranson.com](http://www.michaelranson.com)



## Comment Letter I123: John Riedel, July 12, 2020

**I123**

**I123-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I123-2:** The comment restates information in the EIR regarding several species, including coastal California gnatcatcher, coastal cactus wren, and least Bell's vireo. The comment restates dates of surveys conducted on the project site for these species and states the commenter's opinion that "it is unacceptable to use data from 15 years and 4 years ago for MSCP Special Status Wildlife Species" and that "current comprehensive survey must be performed to be properly analyze for significance of impacts as required by CEQA."

With respect to the comment that current comprehensive surveys are required to properly analyze impacts under CEQA, there is no CEQA requirement that places a time limit or expiration on data that can be used in a technical analysis to support a CEQA analysis, only that the best available information be used. In fact, having a dataset from 15 years and 4 years ago provides valuable baseline information for the status of species in a given location and can inform an impact analysis.

Chris Jacobs, Principal Planner  
 Subject: Fanita Revised Draft EIR  
 Department of Development Services  
 City Hall, [Building 4](#)  
[10601 Magnolia Avenue](#)  
 Santee, California 92071  
[cjacobs@cityofsantee.ca.gov](mailto:cjacobs@cityofsantee.ca.gov)

July 12, 2020

I123-1 Thank you for the opportunity to comment of the Fanta Ranch Revised Draft Environmental Impact Report. With the latest reports of severe declining bird populations worldwide, it is important that we act with great care to protect sensitive status species.

I123-2 The coastal California Gnatcatcher is a Federal and State protected species. Also a part of the City's Subarea Plan for protection, as are two other species. This is acknowledged under Wildlife Resources, page 4.3-12, "Three of the bird species observed are MSCP Covered Species: coastal California Gnatcatcher (CAGN), coastal Cactus Wren (CCN), and Least Bell's Vireo (LBV)." Listed in Table 4.3-4, Special-Status Wildlife Species Observed on the Project Site and Off-Site Improvement Areas, coastal California Gnatcatcher lists 4 pairs, 1 individual<sup>5</sup> and 39 Use Areas<sup>6</sup>. There is notice here that the 4 pairs/ 1 individual data is from 2005 and the 39 Use Areas if from 2016. Coastal Cactus Wren lists 5 clusters in a 2017 survey and notes that their habitat is in recovery from a previous fire. Least Bell's Vireo lists 3 recorded sightings from 1997/2016. It is unacceptable to use data from 15 years and 4 years ago for MSCP Special Status Wildlife Species. A current comprehensive survey must be performed to be properly analyze for significance of impacts as required by CEQA. This is imperative when the DEIR states the following under Sensitive Wildlife Species, page 4.3-47, "Implementation of the proposed project would result in impacts to 987.58 acres of Critical Habitat for coastal California gnatcatcher, including both permanent and temporary impacts; however, only 399.19 acres would be considered suitable habitat for this species." How the conclusion formed that by impacting 60% of CAGN habitat, resulting in only 40% remaining habitat would be suitable habitat for the species is bewildering and unacceptable. It is stated plainly in the DEIR, page 4.3-47, "Implementation of the proposed project would result in the direct loss of habitat, including foraging habitat, for the majority of the special-status wildlife species described in Section 4.3.1.4, as well as those species with modeled suitable habitat and a moderate potential to occur on the project site. These species include the following: (includes) coastal California gnatcatcher, Least Bell's Vireo, coastal Cactus Wren." These are Significant Impacts that mitigation cannot bring to Less than Significant. The DEIR proposes the following mitigation measures to attempt this task, BIO-1, BIO-14, BIO-15 (LBV) BIO-16 (CCW), BIO-18, BIO-22. These are described in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species on page 4.3-57. BIO-1, which would conserve 1,017.61 acres of suitable habitat containing 25 Use Areas 3 (64% preserved); Mitigation Measure BIO-2, which would restore 45.54 acres of temporary impacts to suitable habitat areas; Mitigation Measure BIO-14 which would require preconstruction nesting bird surveys in suitable habitat. BIO-22, The project shall include an interior corridor that is minimally 1,200 feet wide and a northern corridor that is minimally 1,400 feet wide with the exception of one location that narrows to 600 feet for an approximate 800-foot

The EIR summarizes site-specific surveys in Section 4.3.1.1, Biological Survey Methods. As described therein, a substantial amount of field studies were conducted, including over 760 person days of site-wide and focused surveys on the project site, including a focused survey exclusively for willow monardella (*Monardella viminea*), rare plants (40 person days), and eight sensitive wildlife species, including Quino checkerspot butterfly (*Euphydryas editha quino*; 413 person days), burrowing owl (*Athene cunicularia*; 17 person days), coastal California gnatcatcher (*Poliophtila californica californica*; 118 person days), least Bell's vireo (*Vireo bellii pusillus*; 10 person days for riparian birds collectively), southwestern willow flycatcher, coastal cactus wren (*Campylorhynchus brunneicapillus sandiegensis*; 3 person days), San Diego fairy shrimp (*Branchinecta sandiegonensis*; 40 person days for fairy shrimp collectively), Riverside fairy shrimp (*Streptocephalus woottoni*), Hermes copper butterfly (*Lycaena hermes*; 75 person days plus 15 person days in 2020), and western spadefoot (*Spea hammondi*; 3 person days plus USGS survey). In addition, previous wetlands jurisdictional delineations (22 person days plus additional surveys in 2020) were updated and verified. These surveys are further described in Section 3, Survey Methodologies, of the Biological Resources Technical Report (Appendix D). Survey results are presented in



Section 4.3.1.2, General Biological Survey Results; Section 4.3.1.3, Jurisdictional Aquatic Resources; Section 4.3.1.4, Special Biological Resources; and Section 4.3.1.5, Wildlife Corridors and Habitat Linkages, in Section 4.3, Biological Resources.

In addition, the impact analysis also uses modeled habitat suitability rather than numbers of pairs or individuals, including coastal California gnatcatcher use areas (that may not always be occupied from year-to-year), so temporal changes in vegetation communities are actually more relevant to the impact analysis than numbers of individuals or pairs of a species in any given year. For example, had a wildfire destroyed suitable habitat shortly prior to surveys, a habitat-based analysis would be suspect. As noted in Appendix D, Biological Resources Technical Report, the most recent fire on the project site was the 2003 Cedar Fire, allowing the major upland communities on site, including scrub, chaparral, and grasslands (see Table 4.3-1, Existing Vegetation Communities and Land Cover Types on the Project Site and Off-Site Improvement Areas), to fully recover since the original 2004 vegetation mapping following the 2003 fire. The breadth of study has allowed a pre-fire/post-fire/recovery perspective on the resources on site including transitioning use by grasshopper sparrow to coastal California gnatcatcher use for example.

As described in the Biological Resources Technical Report (Appendix D), 39 coastal California gnatcatcher use areas were detected on the project site during 2016 focused surveys using USFWS survey protocols, with the majority located in the southern portion (see Biological Resources Technical Report Table 4-5, Special-Status Species Observed on Fanita Ranch) which was consistent with the previous survey. A use area is defined as a specific area of modeled suitable habitat that each coastal California gnatcatcher pair was observed utilizing (i.e., nesting and/or foraging in) during the surveys. As stated in Biological Resources Technical Report, Table 3-2, Suitable Habitat Models for Special-Status Wildlife Species Present or with Moderate Potential to Occur within the Project Area (including Off-site Areas), modeled habitat for the coastal California gnatcatcher is based on the following vegetation communities: Diegan coastal sage scrub (including valley needlegrass grassland, baccharis-dominated, disturbed, non-native grassland, and fire recovered varieties). There are approximately 1,471.40 acres of suitable coastal scrub habitat for coastal California gnatcatcher on the project site and a total of 2,407.40 acres of USFWS-designated Critical Habitat for coastal California gnatcatcher the project site, 1,356.56 acres of which are modeled suitable habitat for the species.

**I123-3:** The comment states that a comprehensive survey must be performed to be properly analyzed for significance as required by CEQA. The comment restates information from page 4.3-37 of the EIR regarding impacts to “987.58 acres of Critical Habitat for coastal California gnatcatcher, including both permanent and temporary impacts; however, only 399.19 acres would be considered suitable habitat for this species.”

With respect to the comment that current comprehensive surveys are required to properly analyze impacts under CEQA, there is no CEQA requirement that places a time limit or expiration on data that can be used in a technical analysis to support a CEQA analysis, only that the best available information be used.

This comment restates text from the EIR but does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I123-4:** The comment expresses the commenter’s opinion that “by impacting 60% of CAGN habitat, resulting in only 40% remaining habitat would be suitable habitat for the species is bewildering and unacceptable.”

The comment questions the validity of the analysis of permanent and temporary impacts to 987.58 acres of coastal California gnatcatcher Critical Habitat, of which

only 399.19 acres would be considered suitable habitat for the species relying on 15-year old data. First, the habitat suitability model is based in vegetation mapping conducted in 2014 and the coastal California gnatcatcher use areas are based on 2016 surveys (see Biological Resources Technical Report Table 3-1, Schedule of Surveys for Fanita Ranch), so the data for the impact analyses are not 15 years old. While total coastal California gnatcatcher Critical Habitat on site is 2,407.4 acres, based on the habitat model, 1,356.56 acres are considered suitable habitat based on the modeling. Therefore, the 399.19 impacted acres represent 30 percent of the total modeled suitable Critical Habitat on site (see Biological Resources Technical Report Table 5-5b, Impacts to Vegetation Communities and Land Cover Types within Coastal California Gnatcatcher Critical Habitat Areas). The remaining 588.39 acres of impacts are to non-suitable habitat despite their inclusion in Critical Habitat.

It is the impacts to the 399.19 acres of suitable modeled Critical Habitat and 427.85 acres of suitable modeled habitat for the entire project site that are the basis for the proposed mitigation. Mitigation Measure BIO-1 (Preserve Management Plan) would preserve 1,017.61 acres of modeled suitable habitat (69 percent of the 1,471.41 acres total suitable habitat on site) and 25 of 39 (64 percent) of coastal California gnatcatcher use areas

(see Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species); provide in-perpetuity management of the Critical Habitat for coastal California gnatcatcher included in the Habitat Preserve; and contribute to the conservation and recovery of this species. In addition, per Mitigation Measure BIO-14 (Nesting Bird Survey) preconstruction surveys would be conducted prior to construction to ensure that direct impacts to coastal California gnatcatchers would be avoided. If the species is observed, restrictions would be implemented. As stated in Table 4.3-20, Multiple Species Conservation Program Consistency Analysis, all clearing of suitable habitat would be outside of the nesting period as identified in the MSCP Plan area-specific management directives.

Based on the opinion of the biological experts who prepared the impact analysis and the recommended mitigation, the City disagrees with the comment that impacts to the coastal California gnatcatcher are not mitigated to a less than significant level.

- I123-5:** The comment restates information in the EIR regarding impacts to coastal California gnatcatcher, least bell's vireo, coastal cactus wren. These topics are adequately addressed in the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I123-6:** The comment expresses the commenter’s opinion that the impacts to a number of special-status wildlife species “are Significant Impacts that mitigation cannot bring to Less than Significant.” The comment does not state why the commenter believes the mitigation measures identified in the EIR are not adequate to reduce impacts to a less than significant level. Refer to response to comment I123-4. The measures in the EIR provide for a Habitat Preserve that would permanent preserve sensitive habitat for these and other species. Additional mitigation is provided to reduce various direct and indirect impacts to biological resources. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, the City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces all biological impacts to less than significant.

I123-7 cont. length. This length is adjacent to the protected and managed Goodan Ranch/Sycamore Canyon Preserve to the north so it would still function for wildlife movement of mountain lion, coastal California gnatcatcher, and all other species. These mitigation measures are not adequate to bring the direct impacts to CAGN, LBV, CCW and their habitat from Significant to a level of Less than Significant. The DEIR should be updated that impacts to coastal California Gnatcatcher, Least Bell's Vireo and coastal Cactus Wren are significant and unavoidable.

I123-8

I123-9 There is a summary under Section 4.3.7, Comparison of Proposed Project to 2007 Project on page 4.3-135 that compares impacts from the 2007 Proposed project for this site and the current project in this DEIR. The main point is stated here "During the process of development approvals, the proposed project has become less impactful to land, habitat, and species." But the significant impacts cannot be denied as detailed in this Section, "The currently proposed project includes two development bubbles and impacts approximately 988.77 acres of on- and off-site sensitive habitats, 14 California gnatcatcher use areas, 14 basins occupied by western spadefoot, 53 acres of Hermes copper butterfly suitable habitat, and 111 vernal pools and road ruts (0.41 acres), 34 of which support San Diego fairy shrimp." The project site is a vital part of the City's MSCP and proximity to regional wildlife corridors as cited in Section 4.3.1.5 Wildlife Corridors and Habitat Linkages. Under the concerns stated in this letter, the following two alternatives in Section 6 attend to removing the unavoidable Significant Impacts discussed above. The first is in Section 6.1.2 on page 6-3, Alternate Location: "The Alternate Location Alternative would include building the proposed project in a different location from the current project site." The second is in Section 6.2.1, on page 6-1 No Project/No Build Alternative: "Under the No Project/No Build Alternative, the proposed project would not be built nor would any other project be built on the project site. The 2,638-acre project site would remain in its existing undeveloped condition without management. This alternative would eliminate all of the significant and unavoidable impacts identified for the proposed project."

I123-10

I123-11 Thank you for the opportunity to provide input on this project. I look forward to your reply and consideration of the topics this letter has touch upon.

Sincerely,  
John Riedel

**I123-7:** The comment restates and summarizes Mitigation Measures BIO-1, BIO-14, BIO-15, BIO-16, BIO-18, and BIO-22. Refer to response to comment I123-4. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I123-8:** The comment expresses the opinion of the commenter that the mitigation measures identified in the EIR are not adequate to reduce impacts to coastal California gnatcatcher, least Bell's vireo, coastal cactus wren, and their habitat to a less than significant level. The comment further suggests that the EIR should be updated to conclude that impacts to these species are significant and unavoidable. Refer to responses to comments I123-4 and I123-6. The comment does not state why the commenter believes the mitigation measures identified in the EIR are not adequate to reduce impacts to a less than significant level. The measures in the EIR provide for a Habitat Preserve that would permanently preserve sensitive habitat for these and other species and numerous other mitigation measures. No further response is required. Nonetheless, the City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that the recommended mitigation reduces all biological impacts to less than significant.

**I123-9:** The comment restates information from Section 4.3.7 of the Draft EIR, which compares the proposed project with the 2007 project. The EIR determined that the proposed project has been revised and is “less impactful to land, habitat, and species.” The comment continues that the proposed project would still result in impacts as reported in the EIR. The comment concludes that the project site is “a vital part of the City’s MSCP” and plays an important role in regional wildlife corridors as the EIR discusses in Section 4.3.1.5. Please refer to Thematic Responses – Santee MSCP Subarea Plan and Wildlife Movement and Habitat Connectivity. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I123-10:** The comment states there are two project alternatives that would reduce significant impacts identified in responses to comments I123-1 through I123-9. These alternatives are discussed in Section 6.1.2, Alternate Location, and Section 6.2.1, No Project/No Build Alternative, in Chapter 6, Alternatives. Each of these alternatives would avoid development under the currently proposed project on the project site. The comment suggests support for these alternatives but does not raise a significant environmental issue regarding the adequacy or accuracy



of the information provided in the EIR. Therefore, no further response is required.

**I123-11:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I124: Ellen Rothe, July 12, 2020

**I124**

**I124-1:** This comment states that the proposed project will have a severe impact on the environment, primarily traffic and congestion. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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**From:** aasanfa@aol.com  
**Sent:** Sunday, July 12, 2020 8:31 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Project

To: Santee City Planner Chris Jacobs,

I124-1 | I have lived in Santee for 38 years. I have watched the City improve in many ways during these past years. The proposed Fanita Ranch Project will bring those improvements to a halt for Santee residents. Home Fed's 3,000 units will have severe impact on our environment. Santee is already known for it's traffic and congestion. This project will add a low estimate of 4,500 more cars to our roads. As a home owner who loves my city, I am 100% against the massive Fanita Ranch Project!

Respectively,  
Ellen Rothe  
Santee Resident

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## Comment Letter I125: Marie Weber, July 12, 2020

**I125**

**From:** Marie Weber <marie.weber@mail.com>  
**Sent:** Sunday, July 12, 2020 8:04 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch EIR

I125- I have a few questions and concerns regarding the Fanita Ranch EIR.

1 First, Fanita Ranch repeatedly states "We will not add a single new resident at Fanita Ranch until SR-52 improvements are complete" (from their website), and "Traffic improvements will be completed before a single resident moves in to Fanita Ranch" (from their Facebook page). However, The EIR says, "TRA-9: Mast Boulevard/State Route 52 Westbound Ramps Intersection (Direct and Year 2035 Cumulative). **Prior to occupancy of the 442nd equivalent dwelling unit, the proposed project shall widen the westbound approach at the intersection to provide the following lane geometry: westbound – 1 shared thru-right lane; and 2 right lanes, consistent with the improvements proposed in the Santee General Plan Mobility Element. However, since this intersection is within the City of San Diego's and the California Department of Transportation's jurisdictions, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact would considered significant and unavoidable.**"

2 I125- "TRA-10: Mast Boulevard/West Hills Parkway Intersection (Direct and Year 2035 Cumulative). **Prior to occupancy of the 88th equivalent dwelling unit, the proposed project shall widen the intersection to provide the following lane geometry: eastbound – 1 left lane, 3 thru lanes, 1 right lane; westbound – 2 left lanes, 2 thru lanes, 1 shared thru lane/right lane; northbound – 2 left lanes, 1 shared thru lane/right lane; and southbound – 1 shared thru lane/left lane, 1 right lane. However, since this intersection is within the City of San Diego's and the California Department of Transportation's jurisdictions, the City of Santee is without jurisdiction to ensure the construction of the recommended improvements. Therefore, the impact is considered significant and unavoidable. Insofar as SR-52 is within the exclusive jurisdiction of Caltrans, the City of Santee is without jurisdiction to implement any such improvements. Therefore, the impact is considered significant and unavoidable.**"

"TRA-30: State Route 52: Santo Road to Mast Boulevard: Westbound AM Peak Hour (Direct and Year 2035 Cumulative). The applicant has privately funded a Caltrans Project Study Report – Project Development Support (PSR-PDS) for the evaluation of potential improvements to the SR-52 corridor by Caltrans intended to relieve congestion. Caltrans can and should complete its evaluation and implement all feasible improvements along the impacted corridor. **Insofar as SR-52 is within the exclusive jurisdiction of Caltrans, the City of Santee is without jurisdiction to implement any such improvements. Therefore, the impact is considered significant and unavoidable.**"

3 I125- These are just a few of the many traffic concerns mentioned in the EIR. This seems to go against the promise of no resident moving in until SR-52 improvements are complete. It also seems like Fanita Ranch has no jurisdiction to improve the 52. Am I missing something?

4 I125- My next concern involves what will happen if an elementary school is NOT built on site. Obviously, the closest existing school could not handle approximately 700 additional students. The Santee School District does not have bus service. If parents are required to drive their children throughout Santee each morning, that will greatly increase traffic on already overcrowded city streets. Is this taken into account in the EIR?

5 I125- Next is the issue of homeowner's insurance. I have lived on the west end of Santee for 25 years. A few years ago, our insurance company decided not to renew our policy based solely on the high fire risk of our home's location. We had a hard time finding a company who would cover us. I know our situation is not unique in Santee. Fanita Ranch is obviously a high risk location. Didn't this area burn in 2003?

6 I125- What about affordable housing? California law stipulates that a city's housing plan must accommodate a "fair share of the regional housing needs and provide zoning that encourages development of housing that is affordable to the city's residents across all income levels, including affordable housing and middle-income housing." How much of Fanita Ranch is affordable housing?

7 I125- Finally, hasn't Fanita Ranch been voted down by the citizens of Santee on more than one occasion?

**I125-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I125-2:** This comment is a restatement of the EIR language at the locations where the traffic impacts are considered significant and unavoidable since the locations are not within the City of Santee's (City's) jurisdiction. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I125-3:** This comment states that the traffic concerns mentioned in the EIR seem to go against the promise of no residents moving in until State Route (SR-) 52 improvements are complete and asks if the proposed project has jurisdiction to improve SR-52. As stated in the EIR, SR-52 is within the jurisdiction of the California Department of Transportation. The proposed project will be subject to conditions of approval that will be dictated by City staff and City Council that will ensure mitigation measures are completed before project impacts occur. This issue is adequately addressed in the EIR.

- I125-4:** This comment states that traffic will be greatly increased if the elementary school is not built on the project site. Section 4.16.5.1, Threshold 1: Circulation System Performance, in EIR Section 4.16, Transportation, analyzes potential impacts to transportation with the preferred land use plan with school and the land use plan without school. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.
- I125-5:** This comment states the commenter's issues finding homeowner's insurance living in the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I125-6:** This comment requests information about affordable housing. As stated in Section 4.13, Population and Housing, specifically Section 4.13.2.2, the Santee General Plan Housing Element identifies the project site for above moderate housing. At 2,949 units, or 3,008 units without the school, the proposed project would meet and exceed the City's assigned allocation of 1,410 above-moderate units identified in the adopted Housing Element Site Inventory. This comment references state law requirements for Housing Elements of General Plans

to accommodate housing for residents of all income levels. The Santee General Plan contains a Housing Element certified by the Department of Housing and Community Development, the state agency charged with administering Housing Element law. With regard to the proposed project, the Fanita Ranch Specific Plan provides for an assortment of housing types at various density ranges, such as single-family detached homes, attached homes, and senior-restricted housing. These are anticipated to include both for sale and rental housing. There are no deed-restricted affordable housing units proposed in the proposed project.

- I125-7:** This comment asks if the proposed project has been voted down by the citizens of the City in the past. Prior votes on past development proposals are not relevant to the current proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I126: Cynthia Wootton, July 12, 2020

**I126**

**From:** Cynthia Wootton <wootton.clark@outlook.com>  
**Sent:** Sunday, July 12, 2020 3:57 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

I126-1 Dear Chris Jacobs,  
 1 Here are my comments and questions to the Fanita Revised Draft EIR.

**WILDFIRES/WUI**

I126-2 First and foremost, much of the Fanita Ranch project is surrounded by Wildland Urban Interface. The more  
 2 people are invited in, the more likely it is that fires will break out. The residential part of the development will  
 be in an island between the habitat preserve and The Goodan Ranch / Sycamore Canyon Preserve.

I126-3 To quote Sierra Club (see link below), "Most fires are caused by people especially in the wildland urban  
 3 interface (WUI)...all it takes is one spark from a smoke out back, a discarded cigarette, a campfire, fireworks, a  
 car accident, a barbecue. Fires can start when a spark is caused by a lawn mower striking a rock, a faulty  
 electrical box, a fire pit, a candle, faulty or downed power lines that come with urban sprawl."  
<http://sandiegosierraclub.org/get-involved/conservation/our-priorities/>

I126-4 QUESTIONS: How will you ensure that fires started by people using trails or having accidents be put out  
 4 quickly before wildfires can be started especially during Santa Ana seasons and high heat conditions? How  
 I126-5 often will you maintain areas to make sure sprinklers are in good shape, wood fencing and other burnable  
 5 structures are not built and fire pits or barbecues are not used, especially during fire season?

**POTENTIAL DAMAGE ADJACENT PRESERVE**

I126-6 The Goodan Ranch / Sycamore Canyon Preserve is at the northern border of this project, adjacent to where all  
 6 the dwellings are planned in the north of Fanita Ranch. This preserve is protected by the Friends of Goodan  
 Ranch and Sycamore Canyon Open Space, Inc. Goodan Ranch and Sycamore canyon preserve is home to the  
 San Diego thorn-mint, on the Federal endangered species list and covered in the San Diego Multiple Species  
 Conservation Plan NCCP. There are many endangered species located in this preserve. Golden Eagles have  
 been found here. Mountain Lions were detected in 2008 specifically because preserves are part of a large  
 contiguous tract of undeveloped land. This provides suitable conditions for this wide ranging species.

I126-7 QUESTIONS: How will you ensure that people from Fanita Ranch whose dwellings are all concentrated  
 7 adjacent to this preserve to the north will not ride vehicle's and bikes or otherwise destroy this adjacent  
 preserve? By situating dwellings up north, people will be encroaching into territories of endangered species,  
 including golden eagles and possibly mountain lions.

I126-8 Have the protectors of Goodan Ranch / Sycamore Canyon Preserve been made aware of the proximity of  
 8 residence to their preserve? Do they approve of this proximity?  
[https://sdmmp.com/upload/SDMMP\\_Repository/0/93mzxyg1f7sdk6hbp482cwrw0q5nj.pdf](https://sdmmp.com/upload/SDMMP_Repository/0/93mzxyg1f7sdk6hbp482cwrw0q5nj.pdf) p. 30., 42, 44-5

**HABITAT PRESERVE AREA WITHIN FANITA RANCH**

**I126-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I126-2:** This comment states the proposed project is within the wildland-urban interface and expresses the opinion that the proposed project would increase human ignitions. It further states that the proposed project would be an island between the habitat preserve and the Goodan Ranch/Sycamore Canyon Preserve. The proposed project is between existing City urban areas and the Goodan Ranch/Sycamore Canyon Preserve and would present a large fuel break given the converted natural vegetation to ignition resistant landscapes and structures. A comprehensive fire protection system has been designed to protect the proposed project, but that also protects the natural environment by minimizing potential for accidental ignitions and creating wide, maintained buffers between the proposed project and the natural areas. Please refer to the Thematic Response – Fire Ignition and Risk for details regarding humans and ignitions related to ignition-resistant master planned communities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy

of the information provided in the EIR. Therefore, no further response is required.

- I126-3:** This comment quotes text from the Sierra Club’s website regarding the cause of fires in the wildland-urban interface. Please refer to response to comment I126-2 and the Thematic Response – Fire Ignition and Risk for details regarding the latest research on human-caused ignitions from ignition-resistant communities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I126-4:** This comment inquires about how the proposed project will ensure fires started by people are extinguished quickly, particularly during the Santa Ana season and high-heat conditions. The proposed project includes passive protections that separate the developed areas from the adjacent open space. The customized fuel modification zones minimize the potential that an accidental fire on the site would escape into the vegetation by creating low fuel, irrigated and thinned areas as buffers. Further, every building would be fitted with interior fire sprinklers that would control a structure fire until the on-site fire station arrives. The on-site fire station could respond to every unit within approximately 3.5 minutes of travel time. This same response speed would help initial firefighting response to vegetation

fires in the area or along the trails, with a fast size up and call for additional units if needed. The residents would serve as additional monitors for fast fire detection and reporting. The proposed project's homeowners association would provide ongoing resident outreach and education regarding wildfire, and during Red Flag Warning weather conditions, messaging would stress the types of activities that should be avoided until the Red Flag Warning ends.

- I126-5:** This comment inquires about how often maintenance will be performed to ensure sprinklers are functional, wood fencing or flammable structure have not been constructed, and fire pits/barbecues are not used, particularly during fire season. Maintenance will be performed in the site's fuel modification zones (which includes rear yards) on an ongoing basis. These zones would be inspected by a third-party inspector twice annually to confirm they are in condition required by the accepted Fire Protection Plan (Appendix P1). The Santee Fire Department would receive the inspection reports and would have the ability to enforce any abatement issues observed during the inspections. The HOA would be funded to provide the maintenance and inspections. Please refer to Thematic Response – Fire Protection and Safety for more details regarding how the proposed project would manage and enforce the provisions

required in the EIR, Fire Protection Plan (Appendix P1), and Santee Fire Code.

- I126-6:** The comment states that the proposed project is adjacent to the existing Goodan Ranch/Sycamore Canyon County Park, that there are many endangered species located in this park, including San Diego thorn-mint, golden eagle and mountain lion. The project-specific biological resources information, including species information for the golden eagle (*Aquila chrysaetos*) and, mountain lion (*Puma concolor*) is disclosed in Section 4.3, Biological Resources, and in the Biological Resources Technical Report (Appendix D). See also Thematic Response – Mountain Lion. Appendix M to the Biological Resources Technical Report (EIR Appendix D) addresses San Diego thorn-mint (*Acanthomintha ilicifolia*) which is known to occur within the vicinity but was not observed on the project site. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- I126-7:** The comment is asking how impacts from human activity into the Goodan Ranch/Sycamore Canyon County Park would be prevented. Neither the applicant nor the City is responsible for managing human activity associated with the open space and trails outside of their ownership or jurisdiction, respectively. However, the applicant is committed to managing the open space and

trails on the project site. As stated in Section 4.4.2.3, Public Outreach and Education, of the Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]), public outreach and education are critical for ensuring successful management and public support. The Preserve Manager will initiate and sustain community outreach and educational programs that are designed to increase community awareness of the preserve, its biological resources, and community value. The Preserve Manager will provide educational brochures, kiosks, interpretive centers, and signs to educate the public about the Habitat Preserve's conservation goals, biological/physical resources, and appropriate uses on and adjacent to the Habitat Preserve, including appropriate trail user etiquette. It is acknowledged in the EIR that golden eagle (*Aquila chrysaetos*) was observed in the study area (Section 4.3.1.2, General Biological Survey Results) previously and that mountain lions may use the area (Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species). Indirect impacts from the proposed project to biological resources, including sensitive plants and animals, are addressed in Section 4.3.5. The proposed project would include Mitigation Measure BIO-20 that includes the requirement that "adequate fencing shall be erected to guide human users away from open space areas." Further, all human activities occurring in the Goodan

Ranch/Sycamore Canyon County Park would continue to be consistent with and adherent to the regulations set forth by San Diego County Parks and Recreation. Finally, other measures to protect the Habitat Preserve are discussed in Appendix P (Preserve Management Plan) to the Biological Resources Technical Report (Appendix D). In addition, Mitigation Measure BIO-22 (Wildlife Corridor) contains specific measures that would restrict use of trails on site and states that trails would be managed in accordance with the Public Access Plan (see Appendix T to the Biological Resources Technical Report [Appendix D]).

- 1126-8:** The comment is asking if the protectors of Goodan Ranch/Sycamore Canyon County Park have been made aware of the proposed project. The EIR was provided on the City of Santee website to the public on May 29, 2020. Comment letters were received from adjacent landowner, including the County of San Diego, City of San Diego, Padre Dam Municipal Water District and MCAS Miramar. In addition, the applicant has met with adjacent property owners, including the County of San Diego, to further collaborate. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

I126-9 It was stated that habitat preserve will be in the southern 63% (about 1650 acres) of the total area, the southern part, will be left undeveloped as a Habitat Preserve. One good argument for this is that it creates a wildlife corridor. Wildlife corridors need about 160-1600 foot wide spaces, depending on what animals are using the corridor according to various sources.  
However, putting human dwellings in the northern part of Fanita Ranch actually fragments territories of wildlife and reduces their life.

I126-10 QUESTION: HomeFed plans that "Fanita Parkway will be widened from a 2-lane road to a 4-lane road." While this may help traffic to the dwellings in the north of Fanita Ranch, it also interferes with the wildlife corridors for many different animals and plant species. In fact the endangered bird species are along Santee Lakes which is where this expanded roadway would be. Additional roads will be also extended according to the HomeFed plan. By putting the dwellings so far up north, this four-lane road threatens more wildlife. Also the further away people are, the longer are the powerlines which cause so many accidents. Why is the preserve located only in the south of this area? Wouldn't it be wiser for reasons of fire prevention and wildlife protection to keep more of a protective corridor between the unhabitated land of the Goodan Ranch/Sycamore Canyon?

I126-11 Keeping a larger corridor closer to the preserve in the north would expand habitat for many endangered species, such as golden eagles and mountain lions who need isolated large territories for survival. Why not do so?

I126-12 <https://www.biologicaldiversity.org/publications/papers/wild-corridors.pdf>  
<https://www.environment.nsw.gov.au/resources/nature/landholderNotes15WildlifeCorridors.pdf>

I126-13 Under the section 3.3.1.10 Habitat Preserve, it is stated:  
"The intent of this land use is to designate areas that would ultimately be included in City's Final MSCP Subarea Plan, fulfilling the City's commitment to participate in the San Diego MSCP.  
QUESTION: Beyond having an intention, what written promises has Santee given that it will keep this particular area as part of the MSCP? When will Santee fulfill this commitment?  
Have there been any written negotiations or documentation to prove that Santee will make this preserve part of the MSCP?"

I126-14 This section 3.3.1.10 Habitat Preserve also states  
"The project applicant will be responsible for the preparation of a Preserve Management Plan (PMP) and funding for long-term management and monitoring. The Habitat Preserve would be selectively accessible through a managed and maintained trails system."  
QUESTION: How much funding would there be for long-term management and monitoring and maintenance of the trails in the habitat preserve? What is the length of time envisaged for this "long term?"

I126-15 This section 3.3.1.10 Habitat Preserve also states  
"Allowable uses in the Habitat Preserve would include trails, fencing (where necessary), interpretive signage, habitat restoration and revegetation, roadways necessary for public access, utilities, and other uses consistent with Santee's Draft MSCP Subarea Plan."  
QUESTION: How would you patrol these public roadways so that no harm will come to the habitat from various damaging off-road vehicle "fun?"

I126-16 Golden eagles avoid populated areas and trails, how can this preserve actually protect them?  
<http://www.sandiegococo.org/special-species-campaign-to-save-san-diego-countys-golden-eagles/>

I126-17 **DWELLINGS LOCATED IN ISLAND BETWEEN PRESERVES**  
Apart the threat of wildfires that will be caused by putting humans on an island between preserves, people will also have more contact with wildlife. Most people actually do not want contact with wildlife. They do not want to encounter mountain lions, coyotes, raccoons, possums, skunks, bats, rabbits, etc. Most do not want to encounter rats and mice. In fact, there will be poisoning of rats and mice and that will hurt all their predators including hawks, golden eagles, skunks, mountain lions, and their very own pets.

**I126-9:** The comment states that the Habitat Preserve will be located in the southern portion of the proposed project and would allow for wildlife corridors. The Habitat Preserve and the proposed wildlife corridors are shown on Figure 4.3-9, Local Wildlife Corridors, in Section 4.3, Biological Resources. Section 4.3.5.4 discloses the proposed project impact analysis related to wildlife corridors. In summary, the proposed project would result in significant indirect impacts to wildlife movement corridors; therefore, both on- and off-site mitigation was identified to reduce such impacts to less than significant. Refer to Section 4.3.5.4 for additional details. Also refer to the Thematic Response – Wildlife Movement and Habitat Connectivity.

**I126-10:** The comment states the widening of Fanita Parkway would interfere with wildlife corridors and wildlife species. Impacts to wildlife species and wildlife corridors and the mitigation required to reduce impacts to these resources to less than significant are addressed in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, and in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, respectively. Also refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

The commenter states that “endangered bird species are along Santee Lakes which is where the expanded

roadway would be.” This is factually incorrect. If referring to the listed riparian species (i.e., least Bell’s vireo [*Vireo bellii pusillus*]), they are located on the opposite side of Santee Lakes Recreation Preserve in the riparian habitat.

**I126-11:** The comment asks why the Habitat Preserve occurs only in the southern portion of the project site and whether it would be wiser to keep more of a protective corridor between Goodan Ranch/Sycamore Canyon Preserve for fire prevention and wildlife protection. The City disagrees that the Habitat Preserve only occurs in the southern portion of the project site; see Figure 3-4, Conceptual Land Use Plan, in Chapter 3, Project Description. The EIR evaluated a Modified Development Footprint Alternative in Chapter 6, Alternatives, that would develop the southern portion of the proposed project and designated the northern portion as Habitat Preserve. Refer to Section 6.2.3.1, Impact Analysis, for details regarding the wildlife corridor and wildfire impacts related to this alternative. Ultimately, the Modified Development Footprint Alternative would not accomplish four of the nine project objectives described in Chapter 3 and would result in greater impacts related to aesthetics; air quality; geology, soils, and paleontological resources; GHG emissions; noise; population and housing; public services; recreation; transportation; utilities and service



systems; and wildfire. For these reasons, the Modified Development Footprint Alternative was not determined to be the environmentally superior project. Refer to Chapter 6 for additional details.

- I126-12:** The comment asks why the Habitat Preserve was not situated in the northern portion of the project site. See response to comment I126-11, which addresses the same issue raised in this comment. In addition, refer to Thematic Response – Wildlife Movement and Habitat Connectivity.
- I126-13:** The comment reiterates text from the EIR regarding the land use designation of certain areas for inclusion in the City’s Final MSCP and asks what written promises the City has given and when the City would fulfill this commitment. The permanent protection of the Habitat Preserve would be required as a mitigation measure to be fulfilled by the applicant for the proposed project. As stated in Mitigation Measure BIO-1, Preserve Management Plan, in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, a perpetual conservation easement or equivalent land protection mechanism (e.g., Restrictive Covenant) will be recorded for the Habitat Preserve, and the land will be managed by a Preserve Manager, pursuant to Preserve Management Plan (Appendix P of the Biological Resources Technical Report (EIR Appendix D), funded through an endowment or similar mechanism. As stated in Section 1.4.2, Financial

Responsibility and Mechanism, in Appendix P, Preserve Management Plan, to the Biological Resources Technical Report (Appendix D), the land protection mechanism, as required by the City's condition of approval, will be in-place prior to issuance of a grading permit or first ground-disturbing activity. As a clarification to timing, this sentence in Section 1.4.2, Financial Responsibility and Mechanism, in Appendix P, Preserve Management Plan, to the Biological Resources Technical Report (Appendix D), has been revised to the following:

The land protection mechanism, as required by the City's condition of approval, will be ~~recorded-in-place~~ prior to issuance of a grading permit or first ground-disturbing activity.

- I126-14:** The comment reiterates text from the EIR regarding funding for the long-term management and monitoring of the Habitat Preserve and asks how much funding would be required and the amount of time meant by "long-term." As stated in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, preservation of on-site open space requires in-perpetuity management by the Preserve Manager in accordance with a Preserve Management Plan, which would be funded by an endowment or other acceptable permanent funding mechanism. Refer to Mitigation Measure BIO-1 in Section 4.3.5.1 and the Preserve

Management Plan (Appendix P of the Biological Resources Technical Report [Appendix D]) for additional details.

- I126-15:** The comment reiterates text from the EIR regarding allowable uses within the Habitat Preserve and asks what mechanism would be used for patrolling unauthorized uses. As stated in Section 4.4.2.4, Access Control and Enforcement, in Appendix P, Preserve Management Plan, to Appendix D, Biological Resources Technical Report, the Preserve Manager would conduct periodic security patrols of the Habitat Preserve to monitor activities and conditions that could cause long-term degradation of the functions and values of the Habitat Preserve. Appendix P, Preserve Management Plan, Section 4.5, Public Use Tasks, states that signage would establish rules, enforcement methods, and potential enforcement consequences for non-compliant trail users. Refer to the Preserve Management Plan (Appendix P of the Biological Resources Technical Report [Appendix D]) for additional details.
- I126-16:** The comment asks how golden eagles would be protected from indirect impacts related to human activities within the Habitat Preserve. As stated in Section 4.3.5, Project Impacts and Mitigation Measures, the project site does not contain suitable nesting habitat for golden eagle. Potential suitable

foraging habitat does occur; however, the site is unoccupied by golden eagles (EIR Table 4.3-8a). Therefore, indirect impacts to this species from human activities within the Habitat Preserve are not anticipated. Further, the site currently receives abundant and regular unauthorized human use by hikers, bikers, and authorized emergency responder training. As discussed in response to comment I126-15, the preserve would be managed in accordance with a Preserve Management Plan (Appendix P), which includes measures to reduce unauthorized access to the preserve. Nonetheless, the proposed Habitat Preserve would provide approximately 442 acres of potential suitable foraging habitat for this species.

- I126-17:** The comment states that the proposed project will create more contact between humans and wildlife and states that the poisoning of rats and mice will hurt predators. Additionally, as the comment relates to pests within the Habitat Preserve, the Preserve Management Plan Section 4.2.4, Predator/Pest Control, provided as Appendix P to the Biological Resources Technical Report (Appendix D), includes measures to evaluate the need for predator/pest control within the Habitat Preserve. Furthermore, as stated in Section 1.4.1, of the Preserve Management Plan, the Homeowners Association (HOA) will provide all member homeowners information, prepared by the Preserve

Manager, about the Habitat Preserve; the importance of protecting its natural resources; the rights and responsibilities of HOA members in using and protecting the Habitat Preserve (i.e., compatible uses and prohibited activities); self-policing and monitoring; and who to contact if HOA members observe prohibited activities in the Habitat Preserve, either by other HOA members or by the general public. In addition, the HOA may establish voluntary member patrols and implement other activities that promote protection and management of the Habitat Preserve by investing residents in the care of the Habitat Preserve.

Section 4.3.4, Methods of Analysis, states that the project may result in permanent indirect impacts to adjacent open space, including “effects of toxic chemicals (e.g., fertilizers, pesticides, herbicides, and other hazardous materials).” This includes the use of poison to control rodent populations by future residents of the proposed project. As indicated on the CDFW website (CDFW 2020; <https://wildlife.ca.gov/Living-with-Wildlife/Rodenticides>), “rodenticide products containing the active ingredients brodifacoum, bromadiolone, difethialone, and difenacoum are only to be used by licensed applicators (professional exterminators),” and regulations require strychnine to only be used by placement within underground burrows that reduces potential exposure to raptors. Other rodent

control options are also available, and CDFW suggests using other non-chemical pest control methods, such as exclusion and sanitation. Ultimately, future residents of the proposed project would be required to comply with regulations regarding the safe use of poison to control rodents, which would “allow effective and affordable rodenticide products to remain available without causing unreasonable adverse effects to children or wildlife” (EPA 2008; <https://www.regulations.gov/contentStreamer?documentId=EPA-HQ-OPP-2006-0955-0764&contentType=pdf>). Therefore, the effects of secondary poisoning to predators is not anticipated.

1126-17 cont. QUESTION: How can the poisoning of rats and mice be avoided?  
 1126-18 If there is to be a wildlife corridor in the southern part of Fanita Ranch, why not make it a small one and leave the biggest portion of the preserve in the north.

**VERNAL POOLS**

Fanita Ranch has vernal pool habitats, and supports many rare plants and animals ...San Diego fairy shrimp, and willow monkeyflower.

1126-19 City, county, state and federal laws officially protect vernal pools.  
 See:  
[https://www.biologicaldiversity.org/news/press\\_releases/2012/fanita-ranch-10-19-2012.html](https://www.biologicaldiversity.org/news/press_releases/2012/fanita-ranch-10-19-2012.html)  
 QUESTIONS: Have all vernal pools been mapped out carefully and identified in the proper seasons after winter rains in non drought years? How will you ensure that no sites will be harmed?

**GOLDEN EAGLES**

There has been a Bald Eagle siting at Santee Lakes last year according to various sources.  
 There have been Golden Eagles, state listed fully protected species around and within Fanita Ranch is over the years.

1126-20 Golden eagles have been observed flying over the project area over the years. In 1992, EIR Biological Tech Report (BTR) did detect Golden Eagle on the ranch. The present Bio does not. However, The EIR BTR says "All of these flights are assumed to have been transit flights and likely not foraging efforts." This is an assumption not a scientific fact. The project will destroy Golden Eagle foraging habitat so must be mitigated. Lights and new associated power lines may cause problems. Golden eagles have been electrocuted by power lines.

1126-21 QUESTIONS: How do you intend to completely avoid impacts, not mitigate them? What kind of mitigation will you provide as compensation for mitigating Eagle foraging habitat. The analysis must include GOEA activity per USFWS requirements of a 10 mi radius. Has this been done? How will these issues mitigated? Injury/death cannot be mitigated, must be avoided. How will this be done? It was said the on-site habitat preserve (MM-1) will be mitigated. There will be loss and there must be avoidance of foraging habitats. Please explain how you will address these issues.

1126-22 [https://books.google.com/books?id=1.15jgJ-uhkoC&pg=SA66-PA17&lpg=SA66-PA17&dq=golden+eagles+fanita+ranch&source=bl&ots=N5PO7uilwi&sig=ACU3U36YPb547k4FMZvOkCiSabYv-NPiw&hl=en&sa=X&ved=2ahUKEwiS5P\\_NpMfqAhU7Ap0JHa6DAIqQ6AEwFXoECBoQAQ#v=onepage&q=golden%20eagles%20fanita%20ranch&f=false](https://books.google.com/books?id=1.15jgJ-uhkoC&pg=SA66-PA17&lpg=SA66-PA17&dq=golden+eagles+fanita+ranch&source=bl&ots=N5PO7uilwi&sig=ACU3U36YPb547k4FMZvOkCiSabYv-NPiw&hl=en&sa=X&ved=2ahUKEwiS5P_NpMfqAhU7Ap0JHa6DAIqQ6AEwFXoECBoQAQ#v=onepage&q=golden%20eagles%20fanita%20ranch&f=false)  
<https://groups.io/g/SanDiegoRegionBirding/message/9253>  
<http://www.santeelakes.com/wp-content/uploads/2016/10/NEWBirdlist2016.pdf>

**OTHER ENDANGERED SPECIES**

"Fanita Ranch provides habitat for 21 mammal species, 22 species of reptiles and amphibians, and twenty-nine species of butterflies...and over 100 bird species...Fanita Ranch is an essential biological reservoir and serves as a strategic biological linkage to adjacent open spaces within the Multiple Species Conservation Program in San Diego County."

1126-23 The endangered Quino checkerspot and Hermes butterflies, and least Bell's vireo bird are located here. The southern portion of Fanita Ranch has the bulk of 39 pair of Coastal California gnatcatcher and 40 individuals. Coastal California gnatcatcher is on the federally threatened bird species list.  
 The endangered Hermes butterflies have been documented in north Santee, where the project would be. Furthermore, USFWS is looking for restoration and reintroduction sites for these butterflies.  
[https://www.fws.gov/carlsbad/documents/HCB\\_SSA\\_V1.pdf](https://www.fws.gov/carlsbad/documents/HCB_SSA_V1.pdf). (P.25)

**1126-18:** The comment asks why the Habitat Preserve was not situated in the northern portion of the project site. See response to comment I126-11, which addresses the same issue raised in this comment. In addition, refer to the Thematic Response – Wildlife Movement and Habitat Connectivity.

**1126-19:** The comment states that the project site contains vernal pool habitat, asks if the vernal pools were mapped during the appropriate time of year in appropriate non-drought years, and asks how the proposed project would ensure that vernal pools would not be harmed. Section 4.3.5, Project Impacts and Mitigation Measures, acknowledges the existence of vernal pools on the project site, analyzes the impacts to the vernal pools, and provides mitigation to reduce all impacts to less than significant. The survey methods conducted for the project site were conducted at the appropriate time of year, specifically in non-drought years for vernal pools, unless otherwise noted. A separate mapping effort not part of this CEQA process was conducted in 2020 to determine whether the vernal pools within the project site are under ACOE jurisdiction (see Aquatic Resources Delineation Report prepared by Dudek [2020]). During this 2020 effort, LIDAR mapping was used to confirm the accuracy of the field studies. These methods are described in detail in Section 3, Survey Methodologies, in the Biological Resources Technical Report (Appendix D), and the 2020 surveys

are included in the Aquatic Resources Delineation Report (Dudek 2020).

- I126-20:** The comment states that bald eagles were observed last year at Santee Lakes and golden eagles were detected at the project site based on a previous report from 1992. The comment further states that lights and new associated power lines may cause problems for these species. Santee Lakes Recreation Preserve is outside the project boundary, no impacts specific to the proposed project would occur there, and there is no suitable habitat on the project site. See response to comment I126-16, which addresses the same issue regarding impacts to potential golden eagle foraging habitat raised in this comment. In addition, all proposed project utilities on site would be underground. Mitigation Measure BIO-6, Land Adjacency Guidelines, includes guidelines for directing project lighting away from Habitat Preserve areas and the use of low-pressure sodium lighting wherever possible.
- I126-21:** The comment asks how potential impacts to golden eagle would be avoided and mitigated. See response to comment I126-16, which addresses the same issue raised in this comment.
- I126-22:** The comment asks how potential impacts to golden eagle would be mitigated. See response to comment I126-16, which addresses the same issue raised in this comment.



**I126-23:** The comment generally lists the number of species occurring on the project site and specifically identifies Quino checkerspot and Hermes copper butterflies, least Bell's vireo, and coastal California gnatcatcher as present. The comment asks how these species will be protected, restored, and reintroduced.

It is noted that the information provided in this comment regarding the number of species present does not appear to be accurate; however, it is not possible to provide a more detailed response given the list of species was not provided in the comment. Refer to Appendix K, Wildlife Compendium, of the Appendix D, Biological Technical Report, for a complete list of animals observed on the project site.

The proposed project's mitigation strategy, which includes habitat preservation and restoration within the Habitat Preserve for the species listed in the comment, is included in Section 4.3.5, Project Impacts and Mitigation Measures. The Biological Resources Technical Report (Appendix D) includes the applicable mitigation plans for the proposed project. Also, refer to Thematic Responses – Coastal California Gnatcatcher and Hermes Copper Butterfly. The comment does not raise any specific issue regarding the mitigation, therefore, a more detailed response cannot be provided.

1126-23 QUESTIONS: How do you plan to help the protection, restoration and reintroduction effort for these endangered beings?  
cont. <https://preservewildsantee.org/fanita-ranch/>

BUTTERFLY SURVEYING TIMING  
A butterfly survey in 2019 should have been done when the butterflies were much more emergent with the high rainfall and vastly greater emergence of host plants.  
1126-24 QUESTION: Will you redo your surveys at the right time as required?  
Also, please let me know the reasoning behind why this was not done at the right time.

MOUNTAIN LION  
1126-25 There have been mountain lion sightings in San Diego County. Although many older are tagged, younger lions may not be.

The mountain lion is protected as a CESA species, the EIR incorrectly denotes it without such status.  
1126-26 QUESTIONS: Has this project provided compensatory mitigation as required, including cumulative impacts due to increasing human-wildlife interaction?

With all of the trails that will be sculpted through these wildlands, animal contact could result in loss of this wildlife. How will this issue be addressed?  
1126-27 Scripting of mitigation to the future cannot be permitted without performance standards, success criteria, enforcement, guarantee of enforcement and restoration funding, etc. Please explain how you intend to do so.  
[https://sdmmp.com/upload/SDMMP\\_Repository/0/93mzxyg1f7sdl6hbp482cwrw0q5nj.pdf](https://sdmmp.com/upload/SDMMP_Repository/0/93mzxyg1f7sdl6hbp482cwrw0q5nj.pdf) p. 42  
<http://www.sdparcs.org/content/sdparcs/en/AboutUs/mountain-lions.html>

GROUND TRUTHING ANALYSIS IS REQUIRED  
1126-28 Also for ALL the above wildlife, models were used in lieu of ground-truthing. Models are not good enough because they tell nothing about abundance, breeding, movement, status, density, seasonal use, etc.  
QUESTION: Please let us know when this ground-truthing analysis will be performed and carefully mapped out?

DEFERRING MITIGATION DETAILS TO THE FUTURE  
1126-29 In several instances, scripting mitigation details are deferred largely to the future. This is not good enough, there are court cases supporting this.  
QUESTION: Please specify mitigation plans any cases where it is deferred.

ARCHAEOLOGICAL / HERITAGE / Kumayaay sites  
There are archeological/heritage/Kumeyaay grinding stone sites. See the following links.  
1126-30 QUESTION: The Revised EIR discloses that the required consultation with tribes has NOT been concluded. When and how will all sites be mapped out and identified? How will you ensure that no sites will be harmed? When will consultation with Tribes be concluded?  
<https://www.cityofsanteeca.gov/home/showdocument?id=18999>  
[https://www.keepsandiegomoving.com/Libraries/Bike\\_Projects/Appendix\\_E\\_Cultural\\_Resources\\_Technical\\_Report.sfb.ashx](https://www.keepsandiegomoving.com/Libraries/Bike_Projects/Appendix_E_Cultural_Resources_Technical_Report.sfb.ashx)

1126-31 Thank you in advance for considering and answering my questions and comments.  
Respectfully, Cynthia Wootton

Sent from my iPad

**1126-24:** The comment states that an unspecified 2019 butterfly survey should have been conducted when butterflies were much more emergent and asks when surveys will be redone at the right time. The comment fails to include which butterfly species is being referred to in the comment, and therefore, a specific response cannot be provided. The survey methods conducted for the project site were all conducted at the appropriate time of year unless otherwise noted. Survey methods are described in detail in Section 3, Survey Methodologies, in the Biological Resources Technical Report (Appendix D).

**1126-25:** The comment states that there have been mountain lion sightings in the County of San Diego and states that this species is protected under the California Endangered Species Act (CESA) species.

While it is acknowledged that there have been mountain lion sightings in the County, it is noted that no mountain lions have been visually sighted on the project site by biologists during the various surveys completed since 2004 or during the wildlife corridor camera study (Appendix D, Biological Resources Technical Report). As disclosed in the EIR (see Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species), mountain lions were nonetheless considered to potentially use the area based on sign (i.e., scat), and the species was included in the species compendium. The

project site is not considered to support major or critical populations of this species considering the low use of the site. This has been clarified as footnotes in Appendix D, Biological Resources Technical Report, Section 5.4, and EIR Section 4.3, Biological Resources, specifically Section 4.3.6.6, Cumulative Threshold 6: Habitat Conservation Plans, as follows:

To clarify the listing status of this species, the mountain lion was not considered a CESA species at the time the Notice of Preparation (NOP) was issued for the Fanita Ranch EIR, which was November 10, 2018. The mountain lion was petitioned for listing on July 16, 2019, which initiated a CDFW review process that involves determining if there is enough evidence to warrant elevation to the next step of review. It was listed as a Candidate on April 21, 2020, meaning that it satisfied criteria for additional review, thus providing it with the same interim protections as a listed species until a decision is made. These dates were after the issuance of the NOP for the Fanita Ranch EIR. Pursuant to CEQA Guidelines § 15125, the EIR did not consider mountain lion as a Candidate species. It is acknowledged that the lion is legislatively considered a “specially protected mammal” species under California Department of Fish and Game Code since 1990, which effectively protects it from

hunting pressure. However, no hunting is proposed or would be allowed by the proposed project and, therefore, this listing legislation was not considered relevant to the proposed project.

Furthermore, the Habitat Preserve design is adequately sized and configured to retain potential mountain lion occupancy. See Thematic Response – Mountain Lion.

**I126-26:** The comment asks if compensatory mitigation is provided, including for cumulative impacts, due to increasing human and wildlife interaction.

Per CEQA Guidelines, Section 15126.4(a)(3), “mitigation measures are not required for effects which are not found to be significant.” As indicated in response to comment I126-25, mountain lions were not a state candidate for listing at the time of the NOP issuance, and therefore, the relevant listing of the mountain lion for the EIR analysis is “specially protected mammal” that regulates hunting or other forms of take. The proposed project would not include hunting or any other action that would result in the take of mountain lions. Thus, the proposed project would not result in significant impacts to mountain lions, and no mitigation is warranted. The following additional information regarding mountain lions is provided for informational purposes.

Mountain lions have not been sighted on the project site but have been assumed to potentially use the site based on sign (see response to comment I126-25). Due to the low use of the site, the project site is not considered to support major or critical populations of this species. Further, the proposed project's direct impacts to 1,042.37 acres would be considered relatively small and would not be expected to affect the mountain lion population, especially given the Habitat Preserve design, which is adequate to maintain potential mountain lion use. Figure 5-8 in the Biological Resources Technical Report (Appendix D) was revised to include a representative male lion territory of around 73,000 acres. Females have home ranges that are about half of that. A proposed project size (2,638 acres) is small in comparison to the home range of either. Considering the females' home range, the project site would only cover approximately 2.6 percent of a females' territory. Thus, were it to happen, the elimination of the project site from a mountain lion territory would not be substantial. Please refer to Thematic Response – Mountain Lion for further details.

Considering the size of mountain lion territories, cumulative mountain lion impacts are considered based on the cumulative impacts to the 73,000-acre territory area. Both the project-specific mitigation program and coverage under other neighboring jurisdictions' Subarea Plans (e.g., City and County of San Diego and the City

of Poway), which would provide additional protections, would ensure cumulative impacts to mountain lion would be reduced to a less than significant level. Thus, the proposed project would not combine with other projects to result in a cumulatively considerable mountain lion impact. See also Thematic Response – Mountain Lion.

Nonetheless, it is noted that habitat for this species would be protected in the proposed project Habitat Preserve. The Habitat Preserve design would also facilitate continued movement by wildlife through the project site and maintain connectivity to surrounding preserves. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity for additional information regarding human and wildlife interaction.

**I126-27:** The comment states that impacts to wildlife could occur from human contact along trails within the Habitat Preserve. As stated EIR Section 4.3.4, Method of Analysis, the proposed Habitat Preserve currently contains an extensive existing trail system, much of which is subject to frequent, unauthorized off-road vehicle traffic and unauthorized human activities that have been detrimental to the sensitive habitats on site. Therefore, impacts from rampant trail use are part of the existing conditions and would not represent new impacts as a result of the proposed project.

The project proposes to close-off and revegetate a large proportion of the existing trails within the Habitat Preserve and realign existing trails to avoid sensitive resources within the Habitat Preserve. Where these realignments are made, the old trails would be closed and restored. Furthermore, as stated in Section 4.3.5, Project Impacts and Mitigation Measures, without the implementation of the proposed project, indirect impacts to biological resources could continue to occur due to unauthorized motorized and non-motorized vehicles using the site, causing degradation of the natural habitat and sensitive species. The project also includes planting with certain plant species (e.g., cacti) (Mitigation Measure BIO-9), fencing (Mitigation Measure BIO-1 and BIO-20), CC&Rs regarding wildlife, and disclosure and signage (Mitigation Measure BIO-20) to deter human intrusion into open space areas. These measures include the mechanisms to provide enforcement, such as the inclusion in the CC&Rs. Therefore, the proposed project would directly benefit the sensitive species on site from the proposed active habitat management in the Habitat Preserve. Refer to the mitigation measures in Section 4.3.5 and the Preserve Management Plan (Appendix P of the Biological Resources Technical Report) for additional details.

**I126-28:** The comment incorrectly states that habitat modeling was used in lieu of ground truthing. Field surveys were

conducted for special-status species with potential to occur on the project site. Field survey methods are described in detail in Section 3, Survey Methodologies, in Appendix D. Please refer to response to comment O3-5 in Comment Letter O3 (Sierra Club, July 11, 2020).

- I126-29:** The comment incorrectly states that in several instances the mitigation details are deferred largely to the future. All mitigation plans concerning biological resources were included in the EIR, and each specify performance standards and enforcement measures as appropriate. These measures include performance standards such as mitigation ratios, or otherwise conceptual plans such as the Preserve Management Plan are included in the EIR. Performance standards are clearly identified for all mitigation measures provided in the EIR. The comment does not specify which mitigation measure or details are deferred; therefore, no more specific response can be provided.
- I126-30:** This comment states there are Kumeyaay sites on the project site and states that required consultation with the tribes has not been concluded. This comment inquires when and how all sites will be mapped and identified and how will it be ensured that no sites would be harmed. Finally, this comment asks when consultation would be concluded. Section 4.4, Cultural and Tribal Cultural Resources, evaluated the impacts of the proposed project on cultural and tribal cultural resources. Mitigation Measures CUL-1 through CUL-11 have been identified



to mitigate impacts to these resources to a less than significant level in compliance with CEQA. Confidential Appendices E1 through E4 mapped and identified all known historic, archaeological, cultural, and tribal cultural resources on the project site. These appendices may be viewed by individuals who meet the Secretary of the Interior's Professional Qualifications Standards or California State Personnel Board Specification for Associate State Archaeologist or are a representative of a tribal government by appointment at the City. Section 4.4.1.3 of the EIR has been revised to explain that tribal consultation concluded on July 31, 2020.

**I126-31:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I126-32:** This comment is a clarification of a previous comment and states that poisoned rats and mice are likely to have an effect on predators in the preserves. Please refer to response to comment I126-17, which addresses the same issue raised in this comment.

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**From:** Cynthia Wootton <wootton\_clark@outlook.com>  
**Sent:** Sunday, July 12, 2020 11:48 AM  
**To:** Cynthia Wootton  
**Cc:** Chris Jacobs  
**Subject:** Re: Fanita Revised Draft EIR

Dear Chris Jacobs

I wanted to clarify one of my statements below.

I126-32

Because rats and mice will probably end up being poisoned on an island of dwellings in between between preserves, these poisoned rats and mice are more likely to have an affect on the larger group of predators that are roaming in the preserves, especially to the north. This could include hawks, golden eagles, skunks, mountain lions, foxes, and people's very own pets. This is why I ask why are the dwellings in this northern island between preserves.

Thanks!

Respectfully, Cynthia

Sent from my iPad

## Comment Letter I127: Cynthia Wootton, July 13, 2020

**I127**

**I127-1:** The comment states that the proposed project would replace a mature oak grove in Sycamore Canyon with saplings, including five mature Engelmann oaks, which is a vulnerable species. The comment incorrectly states that Sycamore Canyon Creek, which is included in the Habitat Preserve, would be impacted by the proposed project. The EIR acknowledges that there would be impacts to oak trees and the oak woodland vegetation community and reduces impacts to these species to less than significant through Mitigation Measure BIO-4 (Oak Tree Restoration) and Mitigation Measure BIO-1 (Preserve Management Plan), which would conserve 26.36 acres (or 92 percent) of the oak woodland vegetation community on the project site (see Table 4.3-16, On-Site Impacts to Vegetation Communities and Land Covers, in Section 4.3, Biological Resources). Mitigation Measure BIO-4 would reduce impacts to 5 Engelmann oak individuals and 17 individual oak trees by replanting seedling oak trees at a 3:1 ratio according to the Draft Santee MSCP Subarea Plan (refer to Section 4.3.5.1 Threshold 1: Candidate, Sensitive, or Special-Status Species). A total of 66 oak trees shall be planted to meet the 3:1 mitigation ratio requirement in Mitigation Measure BIO-4. Oak tree restoration is included as a component of the Wetland Mitigation Plan (Appendix S of the Biological Resources Technical

On Jul 13, 2020, at 2:53 PM, Cynthia Wootton wrote:

Dear Chris Jacobs,

I127-1 | In section 4.3 page 84 I see that you plan to replace amateur of Grove in Sycamore Canyon with saplings. Among these mature live oak trees are five mature Englemann oaks which are themselves a vulnerable species.

I127-2 | A mature oak grove has mature roots that can withstand the pressures of climate change with its long periods of heat and drought. It's coverage of foliage keeps the ground cool and provides the cool area for animals to survive heat spells. There are whole species of plants and animals that exist below the forest canopy that takes years to thrive. it takes a lot more water to feed new saplings. And special measures measures to allow it to survive harsh heat and drought conditions. there is Biological diversity in an old growth forest. Animals return to special places they know exist for shelter. If you clear it, it kills off the living beings that rely on this ecological environment.

During this age when temperatures keep going up and up and there are longer periods and earlier periods of heat waves all these animals rely on Oak groves for their sustenance and for cooling. Saplings do not have the establish root system that will allow them to endure through these heat waves that we are now getting in San Diego. Saplings will not provide the canopy of shade that all growth oaks takes so long to establish. This is absolutely the wrong thing to do during the adversities of climate change. These are the times to be preserving trees not destroying them. Believe me this is the one thing about climate change that everybody no matter what their political party knows about and would be willing to protest. Humans Of all ages all religions all political parties go to the Oak Groves in mission trails park to walk because it provides them shade during the summer months.

I127-3 | Oak groves are in essential part of the biodiversity of San Diego County.

There is absolutely nothing that can be done to mitigate the destruction of an old growth Oak Grove. They sequester a large amount of carbon to keep our air clean. How can all this be mitigated? It cannot.

I127-4 | QUESTION: There are many areas of park space that are being planned between dwellings. please provide a detailed explanation of why you can't plan around this important Oak Grove, giving it plenty of safe space for wildlife to enter and leave. These are the types of spaces that should be included in any wildlife Corridor planning. Please provide specific reasons why you are not including this in wildlife Corridors. Please perform a detailed analysis of how to keep these oak trees intact and protected. If you do not do so please explain in detail why you will not do this. Believe me, many people know that this is absolutely the wrong thing to do and will protest this in many forms, including In newspapers. this will have project terrible publicity.

Thanks!  
Respectfully, Cynthia Wootton

Sent from my iPad

Report [Appendix D]). It should be noted that Mitigation Measure BIO-4 has been revised as follows to clarify that the oak tree restoration is a component of the Wetland Mitigation Plan:

**BIO-4: Oak Tree Restoration.** Impacts to 5 individual Engelmann oak trees and 17 individual oak trees in the coast live oak woodland vegetation community shall be mitigated at a ratio of 3:1; that is, three established sleeve-sized seedlings for each mature tree (i.e., oak trees with at least one trunk of 6-inch or more diameter at breast height or multi-trunked native oak trees with aggregate diameter of 10-inch diameter at breast height) to be impacted by the proposed project. Therefore, a total of 66 oak trees shall be planted to meet the 3:1 mitigation ratio requirement. Oak tree restoration ~~shall be~~ is included as a component of the Wetland Mitigation Plan (Appendix S), ~~and which shall be reviewed and approved by the City of Santee prepared prior to issuance of mass grading permits with review and approval by the City of Santee . . .~~

The oak tree restoration component of the Wetland Mitigation Plan (Appendix S of the Biological Resources Technical Report [Appendix D]) shall be used to guide the oak restoration effort. Replanting shall occur in the general areas where grasslands occur adjacent to existing oak trees and shall be conducted by a City-approved

contractor. Under that plan, each of the replanted trees must be “established,” which is defined as 5 years of sustained life without the assistance of irrigation and growth rates that are similar to those of naturally occurring reference oak trees. In the event the “established” success criteria cannot be achieved, the applicant and the City shall jointly agree on the implementation of remedial measures to mitigate for impacts to individual oak trees.

- I127-2:** This comment states that mature oak groves have mature roots that can withstand the pressures of climate change, and saplings do not have established root systems that allow them to endure heat waves in San Diego. Please refer to response to comment I127-1, which addresses the same issues raised in this comment.
- I127-3:** This comment states that oak groves are an essential part of the biodiversity of the County of San Diego, and nothing can be done to mitigate the destruction of old growth oak groves. Please refer to response to comment I127-1, which addresses the same issues raised in this comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- I127-4:** This comment asks why the development cannot be planned around the oak grove and why the oak grove is

not included in the wildlife corridor. The comment also recommends performing a detailed analysis of how to protect the oak trees. As stated in Table 4.3-16, the majority of oak woodland (26.36 acres or 92 percent) would be protected through inclusion in the Habitat Preserve and all impacts to those trees would be avoided. The EIR includes an analysis for impacts to oak trees and the oak woodland vegetation community, provides appropriate mitigation according CEQA requirements to mitigate impacts to less than significant. Please see response to comment I127-1.

As stated in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, to the west, a large corridor buffering Sycamore Canyon Creek is provided. This corridor is between 1,000 and 400 feet wide (at the detention basin, which could also be used for movement), but is further widened by the adjacent military base and conserved preserve areas along the entire boundary (see Figure 4.3-9, Local Wildlife Corridors). The project design provides for a primary wildlife corridor through the north-central portions of the project. Therefore, the proposed project results in fewer impacts related to the alternatives, and impacts to oak trees and wildlife corridors would be mitigated to reduce such impacts to less than significant.

## Comment Letter I128: Linda Abbott, July 13, 2020

I128

**I128-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Linda Abbott <user@votervoice.net>  
**Sent:** Monday, July 13, 2020 11:03 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I've been monitoring the progress of this development for the past 20+ years and at this time very interested in moving to Fanita Ranch at retirement.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I128-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Linda Abbott  
8706 Ellsworth Cir  
Santee, CA 92071  
labbott@cox.net

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## Comment Letter I129: Rob Abbott, July 13, 2020

I129

**I129-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Rob Abbott <rapwithrob@gmail.com>  
**Sent:** Monday, July 13, 2020 7:51 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Place looks amazing! Can't wait to see this new community come to life!!

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I129-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Rob Abbott  
11091 Catarina Ln Unit 329  
San Diego, CA 92128  
rapwithrob@gmail.com

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## Comment Letter I130: Mike Aiken, July 13, 2020

I130

**I130-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** maaiken@cox.net  
**Sent:** Monday, July 13, 2020 4:59 PM  
**To:** Chris Jacobs  
**Subject:** Re: Fanita Ranch

Mr. Jacobs,

I130-1 | As a longtime resident of Santee, I am writing to voice my strong support for the long awaited Fanita Ranch project. I have had the opportunity to review the EIR in detail, as well as attend multiple workshops presented by Home Fed and I am so impressed with their attention to detail. They have listened to the opposition and addressed every point. I have also had the pleasure of visiting other Home Fed projects in our region and have spoken with happy residents who purchased homes in their projects. Progress is good and Fanita Ranch will be a great project for Santee.

Mike Aiken

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## Comment Letter I131: Charles Barrett, July 13, 2020

**I131**

**From:** Charles Barrett <cbarrett1410@yahoo.com>  
**Sent:** Monday, July 13, 2020 10:35 AM  
**To:** Chris Jacobs  
**Cc:** Carol LeGard  
**Subject:** Traffic /Emergency Route Concerns

To Whom It Concerns;

I131-1 | My partner, Carol, and I moved to Santee over 5 years ago to be near her aging parents. We live on Pebble Beach Drive overlooking Lake #3 at Santee Lakes. I'm very concerned with the Fanita Ranch development especially concerning routes of escape (egress) if there were to be another fire emergency such as the Cedar Hills Fire in 2003 which came up to Mast Blvd. My in-laws could see the flames. Ourselves and friends have loved ones that cannot be held up in long lines of traffic attempting to access Rte 52. We have the community of Santee Lakes East across the Mast Blvd bridge from us and now the newer Weston development to the West of us. Straight across Mast Blvd. we are confronted with traffic on Carleton Oaks Blvd.

I131-2 | These routs of egress are already nightmares during rush hour and when Weston Hills High School lets out. If there were to be another wild fire or emergency the situation would be dire. Even if Home Federal were to expand Rte 52 that would not be enough to avoid catastrophe. Again, the 2003 Cedar Hills Fire is a real life example. With there being no escape route onto Rte 67 I'm afraid to think of the consequences. This is Life or Death that we are considering.

I131-3 | Question: How does the City of Santee plan to protect its citizens?

Charles Barrett

**I131-1:** This comment states the commenter’s concern regarding wildfire emergency evacuation with the proposed project development. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

**I131-2:** This comment discusses wildfire emergency evacuation in the City of Santee. Please refer to response to comment I131-1, which addresses the same issue raised in this comment.

**I131-3:** This comment asks how the City of Santee plans to protect its citizens. Please refer to response to comment I131-1, which addresses the same issue raised in this

comment. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I132: Cathy Bea, July 13, 2020

**I132**

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**From:** Cathy Bea <cathybea222@gmail.com>  
**Sent:** Monday, July 13, 2020 12:13 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Revised Draft EIR

I132-1: Even with 30 prescribed mitigation measures, impacts to intersections, street segments and freeway mainline segments would remain significant and unavoidable. Please reconsider Fanita Ranch development.

Cathy Bea  
[cathybea222@gmail.com](mailto:cathybea222@gmail.com)  
9962 Jill St.  
Santee, CA 92071

**I132-1:** This comment reiterates traffic information disclosed in Section 4.16, Transportation, of the EIR and asks the City to reconsider the proposed project. The EIR analyzes the transportation impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts, although not all impacts would be reduced to below a level of significance. No further response is required.

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## Comment Letter I133: Kimberley Blackburn, July 13, 2020

**I133**

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**From:** KB <kblackb801@aol.com>  
**Sent:** Monday, July 13, 2020 4:03 PM  
**To:** Chris Jacobs  
**Cc:** John Minto; Stephen Houlahan; Laura Koval; Ronn Hall; Rob McNelis  
**Subject:** Environmental Impact Report for Fanita Ranch

Greetings,

I133-1 I am a concerned Santee resident and do not advocate for the new development. There are so many reasons not  
 1 to build and unanswered questions.

I133-2 Why weren't the vibration impacts to wildlife, such as Western Spadefoot toads, not addressed?  
 2

I133-3 Studies show there is a link between particulate matter in air pollution and autism. Please clarify how you can  
 3 mitigate particulate matter generation for this project.

I133-4 How long is the developer responsible for fixing problems associated with this project? Cover items directly  
 4 related to the development itself, the preserve, and mitigated habitat areas separately.

I133-5 How long would the wait be, for the school to be approved for the site, before you close that option and build  
 5 more homes?

I133-6 Based upon the analysis and conclusions in the Draft Revised EIR, the project would result in potentially  
 6 significant, unavoidable environmental impacts related to: i) air quality; ii) noise; iii) recreation; iv) transportation; and v) utilities. Please explain why residents should allow these to occur and live with these in perpetuity?

Respectfully,  
 Kimberley Blackburn  
 Sent from my iPad

**I133-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I133-2:** This comment asks why vibration impacts to sensitive wildlife species like western spadefoot not addressed. Section 4.3, Biological Resources, specifically Section 4.3.5.1, analyzes the indirect impacts from temporary construction activities, including noise and vibration, to sensitive wildlife species, including western spadefoot. Based on the opinions of the technical experts who prepared the analysis, the EIR concludes that potential impacts to biological resources would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

**I133-3:** This comment asks how the proposed project will mitigate for particulate matter generation. Section 4.2, Air Quality, specifically Sections 4.2.5.1 and 4.5.2.2, analyzes the potential for impacts to air quality, including particulate matter, due to implementation of the proposed project. Mitigation Measures AIR-1 through AIR-5 would be implemented to reduce significant construction emissions of particulate matter and Mitigation Measures

AIR-6 through AIR-10 and GHG-4 would be implemented to reduce significant daily and annual operational emissions of particulate matter, though not to a less than significant level. This issue is adequately addressed in the EIR.

- I133-4:** This comment asks how long the developer is responsible for fixing problems associated with the proposed project, including the development, the preserve, and mitigated habitat. It is unclear what the commenter means by “fixing problems.” The applicant is responsible for implementing all mitigation measures identified in the EIR. Section 4.3, Biological Resources, specifically Section 4.3.5.1, Mitigation Measure BIO-1, Preserve Management Plan, details the management of the preserve and mitigation areas. Other mitigation measures identified in Section 4.3 would also mitigate impacts to sensitive habitat. No further response is required.
- I133-5:** This comment asks how long the developer will wait for the school to be approved before that option is closed and more homes are built. Section 3, Project Description, specifically Section 3.3.1.5, describes the school overlay land use designation. As stated in Section 3.3.1.5, if the school site is not acquired for a permitted educational use within 2 years of the filing of the Final Map for the phase in which the site is located, the underlying Medium Density Residential land use designation would be implemented, and the maximum total number of units

permitted on the project site would be increased by 59 units to 3,008 units. The additional 59 Medium Density Residential units may be transferred from other residential or Village Center planning areas on the project site to this site to achieve the required Medium Density Residential density. The EIR addresses both the preferred land use plan with school and the land use plan without school for the environmental analysis topics in Chapter 4, Environmental Impact Analysis.

- I133-6:** This comment summarizes information disclosed in the EIR that the proposed project would result in potentially significant and unavoidable impacts to air quality, noise, recreation, transportation, and utilities. The EIR analyzes the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts; although not to below a level of significance. The EIR complies with CEQA Guidelines, Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091) and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).

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## Comment Letter I134: Kacie Boen, July 13, 2020

**I134**

**I134-1:** This comment states that traffic in the City of Santee is terrible and growing worse and expresses the commenter’s general opposition to the proposed project. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

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**From:** Kacie Boen <kacieboen@gmail.com>  
**Sent:** Monday, July 13, 2020 4:32 PM  
**To:** Chris Jacobs  
**Cc:** John Minto; Stephen Houlahan; Laura Koval; Ronn Hall; Rob McNelis  
**Subject:** Fanita Ranch - VOTE NO

I am a Santee resident and have been for many years. I own my home in Santee and love our community and raised my three boys in this city.

I believe in progressing, staying with the times, and development. However, there has been much development over the past several years which has gotten out of hand; especially with the latest development across the street from West Hills High School.

I134-1  
1  
Traffic is terrible, and growing worse. Our beautiful environment is being replaced with buildings and homes and all the things that come with losing our land.

On a regular basis I hear my neighbors expressing the same concerns. We do not want or need additional homes built, nor can our infrastructure sustain it.

For years the community has continued to come together in protest of this expansion.

Please vote **NO** on the Fanita Ranch development.

Respectfully,

Kacie Boen  
619-417-8759

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## Comment Letter I135: Vicki Call, July 13, 2020

**I135**

**From:** vicki call <pennypenze2000@yahoo.com>  
**Sent:** Monday, July 13, 2020 12:42 PM  
**To:** Chris Jacobs  
**Subject:** Questions related to draft EIR for Fanita Ranch

JULY 13, 2020

1135-1 To Whom it May Concern:  
 Below are my questions and comments related to the draft EIR on Fanita Ranch (FR). I apologize that I have been unable to BOLD or highlight in some way my questions and/or comments. I have a new computer, and do not know how to activate those features yet. My questions and comments are interspersed throughout. I thank you for your time, and hope you will make a determination that is fair and just. If there are any questions, you may contact me at 619-627-8332. Regards, Vicki Call

1135-2 Executive summary:  
 Will FR ever expand to more than the currently planned (up to) 3008?  
 Who will own the undeveloped land in FR? HomeFed? FR Homeowners' Assn.? The city of Santee?  
 If HomeFed owns the land, is there something in the 'contract'/plan that prohibits them from further development beyond the 3008 homes?

1135-3 Will the Habitat Preserve as currently planned be kept in perpetuity?  
 When FR first presented this plan, they spoke of having a k-8 school. Why is this now different? What will determine whether or not the school will be built?  
 If the school is built, at what point will it be built. How many houses will be built before the school is made available? or...  
 Will the school be one of the first buildings to go up, so Santee schools do not have to be impacted?  
 1135-4 What is the estimated number of students who will be going to k-8th grade and living in FR?  
 Have the local Santee schools had discussions with FR representatives to determine how to handle the extra load should it be necessary?  
 Which Santee schools will be affected if FR does not build a school?  
 How/What will HOME FED contribute to Santee schools to ensure they are able to function properly if there is a large influx of students from FR?  
 If the school isn't built on FR, is the plan for Magnolia, Cuyamaca and Fanita be connected to FR before homes are built, so FR families will have access to Santee schools?

**I135-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-2:** This comment asks if the proposed project will expand to more than the currently planned up to 3,008 units, who owns the land in the proposed project and if there is something that prohibits the developer from going over 3,008 homes. Section 2.0, Introduction, states the project site land is owned by HomeFed Fanita Rancho, LLC, and JWO Land, LLC. The EIR analyzes the impacts of the proposed project including up to 3,008 residential units under the land use plan without school. The approvals listed in Section 3.12, Discretionary Action, would only allow the development of up to 3,008 units. Additional environmental documentation and discretionary approvals would be required if the developer sought to build more than 3,008 residential units on the project site.

**I135-3:** This comment asks if the Habitat Preserve will be kept in perpetuity. The answer is yes. Section 4.3, Biological Resources, specifically Section 4.3.5.1, Mitigation Measure BIO-1, Preserve Management Plan, details the

management of the preserve and mitigation areas. This issue is adequately addressed in the EIR.

- I135-4:** This comment asks why the school proposed by the project is no longer a K-8 school and how many students will be accommodated at the school. Section 3, Project Description, specifically Section 3.5.1, describes the school site could accommodate a K-8 school with up to 700 students, including new students generated by development of the project site.

This comment also asks what will determine if the school will be built or not and what point the school will be built. Section 3, Project Description, specifically Section 3.3.1.5, describes the school overlay land use designation. As stated in Section 3.3.1.5, if the school site is not acquired for a permitted educational use within 2 years of the filing of the Final Map for the phase in which the site is located, the underlying Medium Density Residential land use designation would be implemented, and the maximum total number of units permitted on the project site would be increased by 59 units to 3,008 units. The additional 59 Medium Density Residential units may be transferred from other residential or Village Center planning areas on the project site to this site to achieve the required Medium Density Residential density. This EIR addresses both the preferred land use plan with school and the land use plan without school for



all of the environmental analysis topics addressed in Chapter 4, Environmental Impact Analysis.

This comment also asks which Santee schools will be affected by the proposed project if the school is not built. Section 4.14, Public Services, specifically Section 4.14.5.3, analyzed the potential impacts to public school facilities from implementation of the proposed project for both the preferred land use plan with school and without school. According to the Santee School District will-serve letter (Appendix M), it has capacity to house some new students in existing schools within the district. However, in order to accommodate the total influx of new students, a new school facility would need to be constructed. It is up to Santee School District whether or not the school would be built on the project site. Grossmont Union High School District will-serve letter states they have adequate capacity to serve students from the project site.

This comment also asks if the school is not built, will the proposed project be connected to existing surface roads so proposed project residents can access Santee schools. The proposed project would extend existing Fanita Parkway, Cuyamaca Street, and Magnolia Avenue, which connect to existing City streets that provide routes to existing schools in the area.

- 1135-5: There is mention of a Special Use Area (SUA). What exactly (in laypersons terms) is this? What will happen there that designates it as a SUA?
- 1135-6: What are the geological limitations? Rocks, ditches, etc.? How many acres is this comprised of. What area of FR? north, south, east, west? Is this acreage part of the 63% designated as habitat preserve?
- 1135-7: Are the areas set aside for habitat preserve places where it is difficult to build and/or traverse?  
How were the areas for habitat preservation selected?;
- 1135-8: How many feet will Magnolia, Cuyamaca, and Fanita be extended respectively? How many lanes wide?
- 1135-9: Is there a plan for FR to connect roadways to the Weston development that is being constructed across from West Hills High School (and goes back on ONE ROAD for more than a mile inland)?  
Would that be an additional way to get out of Santee?
- 1135-10: How do you propose to mitigate traffic on those roads in the morning when people are dropping their kids off at Cajon Park Elementary, Santana High, Rio Seco k-8 schools?  
It is unlikely these roads can be widened, as they are built upon already.  
What is HomeFed's or the city of Santee's estimated number of additional cars and/or trips that will enter these roads on a daily basis?
- 1135-11: Will there be a wall built on the bike lanes to protect bicyclists from autos?  
Specifically, where (name projects and give addresses/locations) has the comprehensive fire protection system of fire safety features and design measures worked...examples should be of places where fires have actually occurred.
- 1135-12: How will fuel modification zones be created? How will the need be determined?  
What is the estimated time it would take approximately 6,000 people to evacuate FR in case of a fire?  
Will FR have a fire department? Who will pay for the firemen and maintenance of the station; whose responsibility initially and in the future will it be to purchase and maintain equipment?
- 1135-13: 1.3.1 "CREATE A NEW COMMUNITY"....these are key words. Santee is already a community. This is essentially a new city attaching itself to Santee. Using Santee streets, fire, law enforcement, other emergency services, recreational facilities, stores, schools, etc.  
1.3.2 If we are addressing the state housing crisis, how many FR homes will be designated "low income"? What is their idea of "low income"? This is where the need really exists...low income.  
What will the price ranges be for the homes in FR? How many in each price range?  
1.3.3 Who will be responsible for running the farm on a continuing basis? Will the city of Santee create a position(s)? Will it be run by paid employees? How will produce be shared/distributed/sold? I have been a gardener for many years, and it will be a full time job for whomever is taking care of it.  
If the farm fails, will more homes be built on the land? How many homes could potentially be built there?

**1135-5:** This comment asks what the Special Use area is. Chapter 3, Project Description, specifically Section 3.3.1.9, describes the Special Use area in detail. The Special Use area would include a solar farm and RV/boat storage and above ground agriculture. Figure 3-5, Special Use Area conceptual Site Plan, illustrates the different components of this area.

**1135-6:** This comment asks what the geologic limitations and location of the Special Use area are. Chapter 3, Project Description, specifically Section 3.3.1.9, describes the Special Use area, including its geologic constraints. Due to existing site conditions, including the presence of landslides, no mass grading or introduction of water into the soils is proposed in conjunction with implementation of permitted uses.

**1135-7:** This comment asks for details about the Habitat Preserve. Chapter 3, Project Description, specifically Section 3.3.4, describes the components of the Habitat Preserve. More than half of the project site (1,650.4 acres or approximately 63 percent) would be preserved as permanent Habitat Preserve. The Habitat Preserve applies to open space areas outside the limits of development but including specific revegetated slopes at the edge of the development area. The

**1135-8:** This comment asks how many feet will Magnolia Avenue, Cuyamaca Street, and Fanita Parkway be

extended and how many lanes will be added. Section 3, Project Description, specifically Section 3.4.1, details the proposed improvements to Fanita Parkway, Cuyamaca Street, Magnolia Avenue, and other roadways. The Vesting Tentative Map for the proposed project also provides this data.

**I135-9:** This comment asks if there is a plan for the proposed project to connect roadways to the Weston development. Section 3, Project Description, specifically Section 3.4.1, details the proposed improvements to surrounding roadways. There are no plans to provide a direct connection from the proposed project to the Weston project.

**I135-10:** This comment asks how the City proposes to mitigate traffic on the roads when residents drop off their children at Cajon Park Elementary, Santana High, and Rio Seco K–8 schools and states that the roads cannot be widened since they are built on. Fanita Parkway and Cuyamaca Street have adequate capacity (with mitigation) to accommodate proposed project traffic and an additional connection is not necessary. The roadways serving these schools were all analyzed in the EIR Transportation Impact Analysis (Appendix N) and mitigation measures were recommended where significant impacts were calculated.

The comment also asks what the estimated number of additional cars and trips is that would enter these roads

on a daily basis. Table 4.16-10 of the EIR shows that the project is calculated to add 26,272 average daily traffic (ADT) to the street system.

**I135-11:** This comment asks if there will be a wall built on the bike lanes to protect bicyclists from cars. Section 3, Project Description, specifically Section 3.4.1 and Table 3-6, details the proposed traffic calming measures, including on-street bicycle facilities. No bicycle lane walls are proposed.

**I135-12:** This comment requests information regarding similarly built projects, fuel modification zone (FMZ) creation process, evacuation timeframe, and whether there would be an on-site fire station. Please refer to the Thematic Response – Fire Protection and Safety for details regarding the layered, redundant system of protection required at the proposed project. The fire protection system designed for the proposed project is very similar to the shelter in place communities in Rancho Santa Fe, which have been tested by fire and performed as designed. Among other communities tested by wildfire that are similar to the proposed project are: Cielo, Rancho Santa Fe, 4S Ranch, San Diego, Serrano Heights, Anaheim Hills, Stevenson Ranch, Valencia, and many others. Similar concepts have been employed at college campuses that have been tested by wildfire, such as Pepperdine in Malibu and Westmont College in Santa Barbara. FMZs would be established when site grading

occurs. The FMZs are pre-determined in terms of their overall width. Please refer to Appendix P1, Fire Protection Plan (FPP), for details on how FMZ widths were determined, where they would occur, what plants and planting densities would be allowed, and the type and frequency of ongoing maintenance. The FMZs would be inspected twice annually by a 3<sup>rd</sup> party inspector to ensure they are maintained as intended. Please refer to Thematic Response – Evacuation for details regarding how evacuations are planned and implemented in the City and San Diego County. The estimated timeframe to evacuate the proposed project is 1.5 to 2 hours; however, Appendix P2, Wildland Fire Evacuation Plan, offers the contingency option of on-site refuge should an evacuation be considered unsafe. Per Appendix P1, FPP, the proposed project would provide a fire station on-site in the Village Center and ongoing taxes and fees would provide operating revenues in perpetuity. The comment raises no new issues that have not been adequately analyzed in the EIR and no additional response is required.

**I135-13:** This comment asks how many homes will be designated as “low income” and what the price ranges will be for homes in the proposed project. Section 4.13, Population and Housing, describes the growth in population directly and indirectly related to implementation of the proposed project, including the housing impacts that could result. The Santee General Plan identifies the project site as the

designated location to provide above moderate income units. The proposed project would satisfy the Regional Housing Needs Assessment requirements for above moderate residential units in the City and provide additional residential units to meet the anticipated future deficiencies in the City. The comment related to pricing of the proposed residential units does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment also asks who will be responsible for running the Farm and if the Farm fails, will more homes be built on the land. Section 3, Project Description, specifically Section 3.3.5, describes the details of the Farm. The underlying land use designation for the Farm is Open Space. If the Farm were to fail, the Open Space land use designation would take effect. No residential units would be built there.

	1.3.4	What is meant by a 'passive park'? What amenities will they include? How many will there be and where will they be located?
I135-14	1.3.4 cont'd.	What specifically is meant by an 'active park'? What amenities will there be? How many active parks and where on the property will they be located? Will they be available to the Santee general public?
		How many recreational facilities, and what types of recreation will there be (baseball, basketball, frisbee, pool, kids playgrounds)? Will shaded areas be provided when appropriate (it gets hot in Santee)?
		What are City of Santee park dedication requirements?
I135-15	1.3.5	In miles, how many trails are planned for the FR property? Will trails in FR link with the coast to the mountains trail currently being established?
I135-16	1.3.6	Who will run the farm? Home Fed, FR homeowners association, city of santee employees??
I135-17	1.3.7	Specifically, how will the community be sustainable? What current conservation strategies and technologies are planned. How will greenhouse gas emissions be reduced with 3,000 more homes and 6,000 more cars traveling around Santee???
		Most people travel out of Santee to work. Will there be jobs on FR property that will pay a living wage (enough to cover FR mortgages)?
I135-18	1.3.8	What is a fuel modification zone? What happens there?
		What types of landscape will HomeFed provide on FR?
I135-19		Who will be responsible for continued maintenance of open space ...e.g. brush removal, etc. (fire prevention). Will this be paid for out of the homeowners assn. monthly fee?
		What is the amount of the monthly fee?
I135-20		What ignition resistant (resistant does not mean fireproof) materials will be used when building FR homes?
		When people are evacuating in a panic, how do firefighters get in?
I135-21		What will be width of the streets within FR. Streets in the Weston development are too narrow for two vehicles to pass each other going in opposite directions when there are parked cars on both sides. A danger should there be a need to evacuate.
I135-22	1.3.9 EXTENDING	Magnolia, Cuyamaca, and Fanita is a deceiving term..what is really happening is FR will ACCESS current Santee roads.
I135-23	1.4 Background:	What is a Vesting tentative map development review permit?
I135-24	1.6 Alternatives:	"without open space management" Does this mean if FR is not approved, the property will remain vacant and no trespassing allowed?
I135-25	1.7 Public issues:	Greenhouse gases due to traffic - there is no doubt, carbon monoxide from approximately 6,000 additional vehicles will not IMPROVE the health of Santee residents. When traffic resumes its normal congestion (after Covid19), people

**I135-14:** This comment asks what is meant by “passive park,” what amenities will be included, and how many will there be and where they will be located. Section 3, Project Description, specifically Section 3.3.1.7, and Section 4.15, Recreation, specifically Section 4.15.5.1, describe the passive and active park amenities proposed by the proposed project. A “passive park” means it exclusively includes amenities such as hiking, biking, and nature appreciation. Figure 3-6, Conceptual Parks, Trails, and Open Space Plan, details where the various parks are proposed on the project site.

This comment also asks what the City park dedication requirements are. Section 4.15, Recreation, specifically Section 4.15.5.1, describes the requirements for dedication of land established by the Santee Municipal Code, Chapter 12.40, which requires the amount of land to be dedicated based on the average occupancy rate per residential type and the ratio of dedication equivalent to 5 acres per 1,000 population.

**I135-15:** This comment asks how many miles of trails are planned for the proposed project. Section 4.15, Recreation, specifically Section 4.15.5.1, describes the trails proposed throughout the project site. The proposed project would provide over 35 miles of trails (23 acres), including the perimeter trail and Stowe Trail connection (approximately 4.8 miles combined).

**I135-16:** This comment asks who will be running the Farm. Section 3, Project Description, specifically Section 3.3.5, describes the details of the Farm. A professional Farm operator will manage the Farm.

**I135-17:** This comment asks how the community will be sustainable. Section 3, Project Description, specifically Section 3.3.8, describes the proposed project's smart growth and sustainability features.

This comment also asks how greenhouse gas emissions will be reduced. Section 4.7, Greenhouse Gas Emissions, evaluates the potential for impacts related to increased GHG emissions due to implementation of the proposed project, and recommends mitigation measures to reduce or avoid adverse impacts. The EIR concluded the proposed project would have less than significant impacts from greenhouse gas emissions with mitigation incorporated. This issue is adequately addressed in the EIR.

This comment also asks if there will be jobs on the proposed project property that will pay enough to cover a mortgage. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Section 4.13, Population and Housing, Table 4.13-5 and 4.13-6 identify how many jobs would be created under each land use and state that 450 jobs would be created under the preferred land use with school and 250



jobs would be created under the land use without school. The pay rate for each job is unknown at this time. Therefore, no further response is required.

**I135-18:** This comment requests fuel modification zone definition. As described in Section 3.6.3, the fuel modification zone is the zone around the perimeter of the proposed project that includes between 100 and 150 feet of planned, designed, installed, maintained and inspected landscape that provides a protective buffer between open space areas and developed areas. The fuel modification zone starves fire of fuel and provides a wet zone to further reduce fire behavior and spread rates, resulting in defensible space. This comment does not raise a new issue that has not been adequately analyzed and addressed in the EIR. Therefore, no further response is required.

**I135-19:** This comment requests information regarding the types of landscapes, who will be responsible for maintenance, and the monthly HOA fee. The landscapes planned for the proposed project include ignition resistant, drought tolerant plantings. Please refer to the EIR, Section 3.9, for landscape concept details. The proposed project's HOA would be responsible for ongoing maintenance and would hire a professional contractor to provide the maintenance. The HOA is also required to hire a 3<sup>rd</sup> party inspector to perform twice annual inspections of fuel modification zones and landscape areas to confirm they are maintained

appropriately. The monthly HOA fee would be determined as part of a project proforma prior to occupancy.

**I135-20:** This comment requests information on the types of ignition resistant materials to be used for proposed project structures. As described in Section 4.18, Wildfire, specifically 4.18.5.2, ignition resistant materials that would be used are defined and discussed in Chapter 7A of the California Building Code along with those products tested and approved by the Office of the State Fire Marshal for wildland urban interface use ([https://www.aspyredesign.com/getattachment/d7608435-2a1d-4f53-8fe5-fada4c897b38/CALFIRE-8140-2026\\_2017.pdf](https://www.aspyredesign.com/getattachment/d7608435-2a1d-4f53-8fe5-fada4c897b38/CALFIRE-8140-2026_2017.pdf)). Materials include exterior coverings (stucco or other approved wildland urban interface materials like concrete hardy board), dual pane, one pane tempered windows, Class A roof systems, and ember resistant vents, amongst others. This comment requests information and raises no new issues not already addressed in the EIR. Therefore, no further response is required.

**I135-21:** This comment questions how fire fighters access a fire when vehicles are evacuating and requests details on street widths. All of the proposed project roads would provide adequate width for evacuating vehicles to exit while dedicated inbound lanes remain open for emergency vehicles. Please refer to Appendix P2, Wildland Fire Evacuation Plan, for details regarding the evacuation process at the proposed project and the two primary access routes leading to three egress routes, each with outbound and inbound lanes. Street

widths meet City of Santee requirements and include no parking where needed to maintain unobstructed fire lanes. Please refer to EIR Section 3.4, Infrastructure, for details regarding road widths throughout the proposed project. This comment requests information and raises no new issues not already addressed in the EIR. Therefore, no additional response is necessary.

**I135-22:** This comment states the proposed project will access the current Santee roads. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I135-23:** This comment asks what a vesting tentative map development review permit is. Chapter 3, Project Description, specifically Section 3.12, describes a vesting tentative map as the following:

**Vesting Tentative Map.** The creation of a tentative map for the project is intended to establish vested rights to proceed with a project in substantial compliance with regulations in effect at the time the application is deemed complete.

**I135-24:** This comment asks if the proposed project is not approved, will the property remain vacant and no trespassing allowed. Section 6, Alternatives, specifically Section 6.2.1, describes the No Project/No Build Alternative as the following:

Under the No Project/No Build Alternative, the proposed project would not be built nor would any other project be built on the project site. The 2,638-acre project site would remain in its existing undeveloped condition without management.

**I135-25:** This comment states that greenhouse gases due to traffic including the carbon monoxide from approximately 6,000 vehicles will not improve the health of City residents and air quality would not be good. The comment further states that traffic would be backed up on highway's 67, 125, 52 and City surface streets including Mast Boulevard, Carlton Oaks, Mission Gorge, Magnolia, and Cuyamaca. The amount of traffic generated by the proposed project has been analyzed in both Section 4.2, Air Quality, and Section 4.7, Greenhouse Gas Emissions and Appendices C1 (Air Quality Technical Report), C2 (Health Risk Assessment, and H (Greenhouse Gas Analysis), respectively. Appropriate mitigation measures have been identified to reduce those impacts to the extent feasible in accordance with the CEQA Guidelines Section 15126.4. Carbon monoxide impacts from proposed project vehicles specifically were analyzed in EIR Section 4.2.5.3. The project traffic was distributed to the street system and Mast Boulevard, Carlton Oaks Road, Mission Gorge Road, Magnolia Avenue, and Cuyamaca Street were all analyzed in detail. Where significant impacts were calculated, mitigation measures were recommended. These issues are adequately addressed in the EIR.

1135-25 cont. will struggle to get out of Santee in the morning. Air quality from idling motors will not be good. Until the switch to electric vehicles is made by most people, the effects of so many additional cars can only be detrimental to health of Santee's citizens. Traffic will be backed up on hwy's 67, 125, 52 and ADDITIONALLY backed up onto Santee surface streets....Mast Blvd, Carlton Oaks, Mission Gorge, Magnolia and Cuyamaca (especially around the schools where parents are dropping kids off). HomeFed says it can mitigate the effects of the additional cars, but that does not change the fact that there will be 6,000 more cars on Santee roads, and it must be acknowledged that that cannot be good for our air quality or, for that matter, safety. Additionally, the fact that we are surrounded by mountains (valley) tends to keep pollutants within our area.

1135-26 Noise from traffic: Not only construction noise for several years if FP is approved, but beyond construction, the constant flow of traffic from FP vehicles onto Santee streets. Our roads will suffer damage from large trucks going back and forth during construction and thereafter will suffer damage from constant use by the additional traffic from FP residents.

1135-27 Who will pay for the damages to Santee roadways during construction? Has a agreement been made with HomeFed to repair damaged streets due to back and forth of large vehicles?

1135-28 Congestion....that will be a harsh fact of life if FP is built as planned. Santee has suffered from congestion for several years. Congestion has increasingly become a problem, as our city continues to build housing in every nook and cranny. When the Covid 19 crisis passes, we will all be in for a rude awakening when traffic resumes is normalcy.

You can only put so many people in a square foot. People are in a constant hurry as it is. There are accidents almost daily on Hwy 52...especially involving vehicles returning home at the end of the day. The downhill speed of vehicles far exceeds the speed limit.

1135-29 Fire-evacuation: as I already mentioned, it will be difficult to evacuate up to 6,000 people and their cars from the hills where FP is planned to be built. In a recent city council meeting I attended, the person speaking on behalf of the fire dept. indicated that they now have the capability to alert people of the need to evacuate in segments at a time. This is not realistic. When people are in a panic, they will all react at the same time. Confusion and pandemonium will abound. I have experienced an evacuation during the 2003 fires, when I helped my aunt and uncle evacuate from La Cresta. They had MINUTES to get out. They were notified via Sheriff's helicopter telling residents to get out NOW. Believe me, it was not orderly. We must stop thinking about money \$\$\$\$ first, and think about quality of life. Specifically, the quality of life of the current residents of Santee. I would think our concerns would have validity with those who make decisions on our behalf.

1135-30 Safety first  
Brush management: In the same city council meeting, brush management was discussed. Some of the council members voiced concern (as well as members of the public) about how brush management would be done on a continuous basis. A member of the public spoke. He is a resident of Sky Ranch, where apparently this is a major issue/concern when it comes to fire safety. They have had problems with brush management. They live high on a hill/small mountain. It's easy to say it will be handled, but HomeFed will be long gone when these issues arise. FR would be built on hills...more fire prone. Our Santa Ana winds move quickly.

1135-31 Table 1.1  
Scenic vista- the FP project "would not have a substantial adverse effect on the scenic vista"  
In whose opinion??  
Who determines this?  
What criteria are reviewed/examined before this opinion is given? Who are these experts?  
Were Santee residents part of the decision?

1135-32 In MY OPINION it will have a detrimental effect on our scenic vistas. Instead of our beautiful green hills in the spring and our golden hills in summer and autumn, we have houses all around. One of the great features of Santee is the

**I135-26:** This comment states the roads will suffer damage from large construction trucks and residential traffic from the proposed project. The City is responsible for road repair and would require the developer to pay for any damage from construction vehicles. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

This comment further states the noise from construction traffic and the operational traffic on City streets. Section 4.12, Noise, specifically Section 4.12.5.1, discusses the impacts of the proposed project traffic on existing City streets and identified appropriate mitigation to mitigate those impacts to the extent feasible in accordance with the CEQA Guidelines Section 15126.4.

**I135-27:** This comment asks who will pay for damages to Santee roadways during construction. Please refer to response to comment I135-26, which addresses the same issue raised in this comment.

**I135-28:** This comment discusses congestion in the City and other thoughts of the commenter. It is not clear how this comment relates to the adequacy of the EIR analysis for the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further

response is required. Nonetheless, the EIR Transportation Impact Analysis (Appendix N) analyzed all Circulation Element roadways and intersections within the City of Santee. Traffic improvements were recommended at each location where significant impacts were determined using City standards.

**I135-29:** This comment provides opinions regarding evacuations and questions the validity of Santee Fire Department’s statements on evacuation processes including phasing. Please refer to the project-specific Wildland Fire Evacuation Plan (Appendix P2) and Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. This comment provides opinions lacking supporting data and raises no new issues not already addressed in the EIR. Therefore, no further response is required.

**I135-30:** This comment questions whether brush management will occur for the long term of the proposed project and cites the Sky Ranch example where brush management is allegedly not occurring. The proposed project would be conditioned to fund fuel modification maintenance through the HOA. The proposed project’s Fire Protection Plan (Appendix P1) details the fuel modification zones and the type of maintenance that must be performed. These areas would be inspected twice annually to confirm that maintenance is being conducted and that they would function as intended.

Compliance issues would be brought to the Santee Fire Department's attention and they would issue abatement notices, followed by forced abatement if the issues are not corrected. Costs for forced abatement would be passed along to the HOA and/or its homeowners. This comment requests information and raises no new issues not already addressed in the EIR. Therefore, no further response is required.

**I135-31:** This comment asks what criteria is used or who determines what a scenic vista is. The Santee General Plan describes numerous topographic features in the City and the surrounding vicinity as providing distinctive views and vistas from developed portions of the City. Section 4.1, Aesthetics, evaluates the potential for changes to visual character and quality with implementation of the proposed project. This analysis provides information on the character of the existing visual landscape, the locations and types of public views that include the project site, and the potential visibility of the proposed project from these public viewing locations. This section then evaluates potential impacts as a result of implementing the proposed project in terms of adverse effects to scenic vistas, visual character and quality degradation and landform alteration, damage to visual resources within a state scenic highway, and creation of new sources of light and glare affecting daytime and nighttime views. This section is based on a

series of 16 photosimulations prepared from various key viewpoints around the project site (Visual Impact Group 2020). The photographs considered and a description of the process used to prepare the visual simulations are provided in Appendix B. The EIR concluded a less than significant impact would occur from the proposed project on scenic vistas.

**I135-32:** This comment states the commenter’s opinion that the proposed project will have a detrimental effect on scenic vistas due to the development blocking views to the surrounding hills and mountains. Please refer to response to comment I135-31 which addresses the same issue raised in this comment. As stated therein, the EIR concludes that the proposed project would not result in a significant impact to scenic vistas.



1135-32 cont.	surrounding hills and views of local mountains like El Capitan and Cuyamaca. Currently Weston is in the process of completing construction of over 450 homes across from West Hills High School. This property was initially part of the city of San Diego. Is now, or will become part of Santee. Prior to construction, you could look at our beautiful hills as you drove by on Mast Blvd, or come in to town via Hwy 125. Now you see a big wall and boxy homes that block the view of nature. How can this NOT be detrimental to the scenic vista?
1135-33	Visual Character and Quality: "The proposed project would have a less than significant impact on the visual character and quality of the site and would have a less than significant impact on publicly visible landform alteration." Again, in whose opinion? The FP project will have an extremely significant impact on the visual character and quality of the site....it will be COMPLETELY CHANGED.
1135-34	..."a less than significant impact on publicly visible landform alteration"...again, it will be COMPLETELY CHANGED. What experts determined this? On what basis was this determination made? Did Santee citizens give their opinions? Where are are local hills? Gone. Lighting and glare from 3,000 homes and street lights will have no effect? Tell me how.
1135-35	Table 1.1 Air Quality Consistency with Applicable Air Quality Plans: The proposed project would result in a conflict with the applicable air quality plans. Air 1: If the project is approved, what agency representatives will be physically on site to be sure all requirements for air pollution are met during FR construction? We need to make sure that what appears on paper happens in real life. How often will monitoring take place? Will monitoring be done by neutral parties? How will city of Santee council members keep tabs on construction? What departments in Santee city government will be responsible for monitoring construction requirements? Who, in Santee city government will ensure requirements are met during construction? Who initiates monitoring? FP construction staff? City of Santee city council members? Someone in Santee city government? This would be a years-long project...we must not get careless..monitoring to ensure safe practices to minimize air pollution must continue through the completion of the project. Do you really think truckers are going to do wheel washing every time they go in and out of the project on rainy/muddy days?
1135-36	" Remove visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out at the conclusion of each workday when active operations cease..." Who will ensure that this happens during the entire time the project is underway? What is the name of the agency? How often will they inspect the site? "... or every 24 hours for continuous operations. "...What operations would be happening continuously for 24 hours?
1135-37	"If a street sweeper is used to remove any track-out/carry-out, only respirable particulate matter (PM10)-efficient street sweepers certified to meet the most current South Coast Air Quality Management District's Rule 1186 requirements shall be used." Who determines what company will get the contract to do this monitoring?

**1135-33:** This comment states the commenter’s opinion that the proposed project will have an extremely significant impact on the visual character and quality of the project site. Section 4.1, Aesthetics, analyzed the potential visual impacts of the proposed project from 16 viewpoints. Specifically, Section 4.1.5.3, discusses the proposed project’s impacts on visual quality and character and landform alteration. The proposed project would alter the existing aesthetic characteristics of the project site, as well as alter the existing landform in certain areas from a variety of vantage points in the City and adjacent areas. To protect and manage hillsides and topographic resources, the City has adopted hillside development guidelines as described in Table 4.1-1, City of Santee Hillside Development Guidelines. The large cut and fill slopes on the project site, as identified on the Vesting Tentative Map, that are visible from the public rights-of-way would use landform grading techniques to recreate and mimic the flow of natural contours and drainages in the natural surroundings. Where development is proposed on hillsides, grading would be efficient to minimize the grading footprint. Special contour grading techniques would be used at edges and transitions in landform. During construction, these slopes would be temporarily devoid of vegetation; however, they would be revegetated and landscaped in compliance with the Santee Municipal Code, Chapter

12.26, Landscape and Irrigation Regulations, and the Guidelines for Implementation of the City of Santee Water Efficient Landscape Ordinance (2017). By complying with the policies in the Santee General Plan and the requirements of the Santee Municipal Code, as well as adhering to the guidelines set forth in the Fanita Ranch Specific Plan, the EIR concludes that the proposed project would not degrade the existing landscape from a public viewpoint. This issue is adequately addressed in the EIR.

**I135-34:** This comment states the commenter’s opinion that the proposed project will completely change the publicly visible landform on the project site. This comment also asks what expert determined this. Please refer to response to comment I135-33 which addresses the same issue raised in this comment.

**I135-35:** The comment references Table 1.1 Air Quality in Chapter 1, Executive Summary, of the EIR and includes a statement that the proposed project would conflict with the applicable air quality plans. This finding is due to the fact that the proposed project did not reduce all criteria pollutant emissions below the quantitative threshold after employment of all feasible mitigation measures. Mitigation Measures AIR-1 and AIR-2 focus on fugitive dust control measures, Mitigation Measures AIR-3 through AIR-5 focus on construction equipment exhaust emissions, and Mitigation Measures AIR-6 through

AIR-10 focus on reducing emissions from long-term operational activities of the proposed project. While these mitigation measures would significantly reduce air quality impacts, they would not reduce them to below a level of significance.

The comment then focuses on Mitigation Measure AIR-1 asking if the project is approved what agency representatives will be onsite to be sure the mitigation measure is being enforced. The City of Santee as Lead Agency is responsible for ensuring that all mitigation measures related to the proposed project are implemented. The City will document mitigation measure implementation through a Mitigation Monitoring and Reporting Program (MMRP) that includes the timing of the mitigation measure, who is responsible for implementing each mitigation measure, who is responsible for verifying the mitigation measure is implemented, the date that the mitigation measure went into effect, and the date that the mitigation measure implementation is complete. The MMRP will be approved at the same time the EIR is certified (if it is certified). For Mitigation Measure AIR-1, the construction contractor is responsible for keeping daily logs of compliance with the San Diego Air Pollution Control District (SDAPCD) Rule 55-Fugitive Dust Control. The daily logs will include instances of visible dust emissions and what control measures were put in

place to ensure that visible dust did not cross the property line. The daily logs will also document wind speed and include dates and signatures of the individuals making the log entries. City Planning staff are responsible for periodically checking the daily logs to ensure that Mitigation Measure AIR-1 is being implemented and will document that observation in the MMRP.

The comment also asks how often will monitoring take place, will monitoring be done by a neutral party, who in the City will be responsible, and who will initiate monitoring. As described above, on-site monitoring will take place on a daily basis by the construction contractor. City staff will periodically check the daily logs to verify compliance. City Planning is responsible for monitoring and enforcement of the MMRP, but can designate City staff from other departments to verify compliance. As an example, the City Planning Department could have the building inspector verify compliance of the mitigation measure when they are visiting the site.

The comment continues that the proposed project will be years long and monitoring must take place. The comment continues with the rhetorical question of “Do you really think truckers are going to do wheel washing every time they go in and out of the project on rainy/muddy days?” The answer is yes, trucks are required to go through the wheel washing station at the designated truck access point into/out of the site. This is

required by SDAPCD Rule 55, Mitigation Measure AIR-1, and would be verified through the MMRP.

**I135-36:** The comment quotes from the third bullet point in Mitigation Measure AIR-1, which is focused on removing visible roadway dust on the paved project access roads at the end of each workday and asks who will ensure this happens during the entire time the project is underway, what is the name of the agency, how often will they inspect on site, and what operations would occur continuously for 24 hours.

As discussed in the response to comment I135-35, the City is responsible for ensuring all the mitigation measures are implemented and verify implementation through the MMRP. The MMRP and verification will continue until all mitigation measures have been completed. The construction contractor will document implementation of Mitigation Measure AIR-1 in daily logs and City staff will periodically inspect the daily logs to verify compliance. Twenty-four hour operations of construction activities are not anticipated to occur.

**I135-37:** The comment quotes another portion of Mitigation Measure AIR-1, focused on street sweepers and asks, who determines what company will get the contract to do this monitoring, and will they be called in on an as-needed basis. The City is responsible for monitoring

1135-37	cont.	Will they be called in on an as-needed basis?
1135-38		<p>"In addition, visual fugitive dust emissions monitoring shall be conducted during the construction phases. Visual monitoring shall be logged. If high wind conditions result in visible dust during visual monitoring, this demonstrates that the above measures are inadequate to reduce dust in accordance with San Diego Air Pollution Control District Rule 55, and construction shall cease until high winds decrease and conditions improve."</p> <p>Who will be responsible for visual monitoring? Person(s) that are part of the construction crew?            What information will be logged?            How often will visual monitoring be done?            What criteria will be used to determine whether or not construction should cease until conditions improve?</p>
1135-39		<p>AIR-2: Supplemental Dust-Control Measures. As a supplement to San Diego Air Pollution Control District Rule 55, Fugitive Dust Control, the applicant shall require the contractor to implement the following dust control measures during construction. These measures shall be included in project construction documents, including the grading plan, and be reviewed and approved by the City of Santee prior to issuance of a grading permit.</p> <p>Has a contractor already been selected? Does HomeFed have a contractor they use for their projects?            If yes, have we done any research to determine if they have had any violations of standards they were required to keep? This should be checked out if applicable.            These requirements are reviewed AFTER approval of the FP project, correct?            I am assuming the city of Santee has experts who will review construction documents, including the grading plan, is this correct, or will be going to outside agencies for review?</p>
1135-40		<p>"Apply soil stabilizers to inactive construction areas (graded areas that would not include active construction for multiple consecutive days). ☐ Quickly replace ground cover in disturbed areas that are no longer actively being graded or disturbed. If an area has been graded or disturbed and is currently inactive for 20 days or more but will be disturbed at a later time, soil stabilizers shall be applied to stabilize the soil and prevent windblown dust.</p> <p>What types of soil stabilizers will be used?            What kind of ground cover would be found on the hills? Grasses? Bushes?            Who will monitor this?            "Reduce speed limits on unpaved roads."...What will the speed limit be?</p>
1135-41		<p>AIR-3: Tier 4 Construction Equipment. The City of Santee shall require heavy-duty, diesel-powered construction equipment used on the project site during construction to be powered by California Air Resources Board-certified Tier 4 (Final) or newer engines and diesel-powered haul trucks to be 2010 model year or newer that conform to 2010 U.S. Environmental Protection Agency truck standards. This requirement shall be included in the construction contractor's contract specifications and the project construction documents, including the grading plan, which shall be reviewed and approved by the City of Santee prior to issuance of a grading permit. This mitigation measure applies to all construction phases.</p> <p>When the project is initiated, who/what agency will do a physical visual inspection to determine if the appropriate equipment is being used?            Will a representative of Santee city government be present?            How often will this be done throughout the project?</p>
1135-42		<p>AIR-4: Construction Equipment Maintenance. The City of Santee shall require the project construction contractor to maintain construction equipment engines in good condition and in proper tune per the manufacturer's specification for the duration of construction. Contract specifications shall be included in project construction documents, including the grading plan, which shall be reviewed and approved by the City of Santee prior to issuance of a grading permit.</p>

and verification of Mitigation Measure AIR-1 implementation. The construction contractor is trained in SDAPCD Rule 55 compliance and will be onsite during all construction activities and providing daily logs demonstrating compliance.

**1135-38:** This comment quotes the portion of Mitigation Measure AIR-1 focused on monitoring visible fugitive dust emissions, daily logs verifying monitoring, and contingency measures during high wind conditions when construction activities must end and dust control strategies fully employed. The comment then asks who is responsible, what information do they log, how often will visible monitoring be done, what criteria will be used to determine whether or not construction should cease until conditions improve. The City is responsible for verification of the implementation of Mitigation Measure AIR-1 using the MMRP. The construction contractor will be responsible for implementing all the fugitive dust control measures and providing visible dust monitoring during all earth disturbance activities at minimum daily but should occur periodically throughout the day. Daily logs will include the dates and times of visible dust monitoring, instances when visible dust was observed crossing the property line, fugitive dust reduction strategies employed to control dust, daily wind speed will also be logged. Construction activities must cease whenever visible fugitive dust emissions as

observed through monitoring cannot be controlled with the fugitive dust control measures being employed. Wind speeds in excess of 20 miles per hour (MPH) is one quantitative indicator that high winds are present and ground disturbance activities need to cease. However, anytime visual monitoring determines that the fugitive dust control measures are ineffective in controlling fugitive dust even if wind speeds are below 20 MPH, then earth disturbance activities must cease and construction crews focus on continued employment of fugitive dust control measures until fugitive dust is under control.

**I135-39:** This comment focuses on Mitigation Measure AIR-2: Supplemental Dust Control Measures which include the need to describe the fugitive dust control measures that will be employed in the grading plans for the proposed project. The comment asks if the contractor has already been selected and has the City researched the contractor for past violations. The comment also asks if this occurs after approval of the proposed project.

Decisions on whether or not a contractor has been chosen does not relate to potential environmental impacts and CEQA. However, it is important that the construction contractor is trained in compliance with SDAPCD Rule 55 and fugitive dust control measure generally. The contractor chosen will be responsible for implementing construction period Mitigation Measures

(AIR-1 through AIR-5) during the duration of project construction. The City will verify compliance with the mitigation through the MMRP. The City will also be responsible to review grading plans to ensure that the fugitive dust control measures are explicitly stated in the plans prior to issuing a grading permit. Grading permits can only be issued after the proposed project has been approved.

**I135-40:** This comment focuses on the use of soil stabilizers, replacement of ground cover in disturbed areas, and the reduction of speeds on unpaved roads all required under Mitigation Measure AIR-2. The comment asks what kind of soil stabilizers will be used, what kind of ground cover, who is monitoring, and what the speed limit will be for unpaved roadways.

Soil stabilizers are soil binding materials applied to the soil surface to temporarily prevent water and wind induced erosion of exposed soils on construction sites. The exact soil binding material has not been chosen but typically falls into these categories: organic and polymer based binders. Organic based binders include guar, psyllium, and starch. Guar is a non-toxic, biodegradable, galactomannan-based hydrocolloid treated with dispersion agents. Psyllium is a plant based soil stabilizer. Starch based soil stabilizers are made from corn starch. Polymer based binders include liquid or solid polymers, or copolymer with an acrylic base that



are non-toxic and non-flammable. The soil stabilizers are mixed with water and sprayed on recently disturbed areas and soil stockpiles to reduce erosion and prevent dust emissions. Ground cover will be provided in several ways depending upon the need. The most basic ground cover will be hydro-seeding. In some cases, areas will have a biodegradable netting material (often called a mat) applied in combination with hydro-seeding. Other forms of ground cover include straw or wood mulch.

The construction contractor is responsible for the application of soil stabilizers, ground cover and other fugitive dust control measures. The construction contractor will also be responsible for documenting when and where soil stabilizers were applied in the daily logs. The City is responsible for verifying mitigation compliance using the MMRP.

The speed limit for onsite vehicles including haul trucks on unpaved roads is 15 MPH or less. Also, see response to comment I106-9 of the comment letter by Robin Rierdan.

**I135-41:** This comment focuses on Mitigation Measure AIR-3: Tier 4 Construction Equipment and asks who or what agency will do an inspection to determine if the appropriate equipment is used, will City staff be present during inspection, and how often will the inspection be done.

To ensure compliance with Mitigation Measure AIR-3, the City has a condition of approval on the proposed project specifying that California Air Resources Board (CARB) certified Tier 4 construction equipment is used. That condition of approval is written into the contracts with the construction contractors for the proposed project. The City will verify that this condition is met before providing grading permits and it will be documented in the MMRP. Verification of this easily done by providing a copy of the CARB certification for the equipment and verifying that the certificate matches the equipment on site by the equipment identification numbers. This monitoring and verification will be done each time a new piece of equipment is brought on site for the proposed project.

**I135-42:** This comment focuses on Mitigation Measure AIR-4: Construction Equipment Maintenance and asks who/what agency will determine that this requirement is met and how often will this verification occur. Similar to the process described in response to comment I135-41, the City has a condition of approval on the proposed project with the exact text of Mitigation Measure AIR-4. As specified in Mitigation Measure AIR-4, the specific requirements of Mitigation Measure AIR-4 must be included in all grading plans and other construction documents and reviewed and approved by City staff prior to the issuance of grading permits.

1135-42	Who/what agency will determine that this requirement is being met? How often will this be done throughout the project?
1135-43	AIR-5: Use of Electricity During Construction. During construction activities, when on-site electricity is available, the City of Santee shall require the contractor to rely on the electricity infrastructure surrounding the construction site rather than electrical generators powered by internal combustion engines. Contract specifications shall be included in project construction documents, including the grading plan, which shall be reviewed and approved by the City of Santee prior to issuance of a grading permit.  What will be the source of electricity for the contractor? How will the contractor be billed for electricity usage? Who will inspect to ensure generators are not in use?
1135-44	AIR-6: Transportation Demand Management. Prior to recordation of the first final map in each phase, the applicant or its designee shall provide evidence to the City of Santee that the project shall implement the following Transportation Demand Management measures identified in the Transportation Impact Analysis (LLG 2020): ☑ Improve design of development to enhance walkability and connectivity ☑ Provide pedestrian network improvements ☑ Provide traffic-calming measures ☑ Provide bike lanes in the street d)☑ Provide bike parking for multi-family residential uses ☑ Implement car-sharing programs ☑ Provide ride-sharing programs ☑ Implement commuter trip reduction marketing ☑ Implement a school carpool program under the preferred land use plan with school ☑ Implement a neighborhood electric vehicle network esign  How will HomeFed ensure car-sharing programs, ride-sharing programs, commuter trip reduction marketing, school carpool programs will continue successfully after construction? Who will be responsible to ensure these programs continue after construction is complete and HomeFed is no longer involved? Traffic-calming is one of our newly deceptive phrases that disguises reality. No matter how you look at it, Santee will be overcrowded. Let's be realistic. 6,000 additional trips on Santee city streets will have a detrimental affect. Funds will be needed for road repairs due to added vehicles. People will be in traffic jams on a daily basis getting in and out of Santee to go to work. Most people who earn a living wage work out of Santee, this would hold true for FR residents, as most of the homes will have a large monthly mortgage. I have already mentioned the freeways that will be negatively impacted (rush hour is more than an hour). Maybe we need a new phrase here...to disguise reality. Traffic will be a big problem. Even getting around to do shopping, go to the bank, get gas....traffic and short tempers that will get even shorter. What happened to people putting quality of life ahead of money? If you have money (in the city coffers), but the citizens are harried and unhappy, what good is it?
1135-45	AIR-7: On-Site Electric Vehicle Charging Stations. Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City of Santee that the project shall include a total of 1,203 240-volt Level 2 Electric Vehicle Supply Equipment (EVSE) in each garage provided for a Low Density Residential (LDR) unit, a total of 354 EVSE within the parking areas of the remaining residential units (Medium Density Residential (MDR), Village Center (VC) and Active Adult Residential (AA)), and 15 EVSE within the project's commercial parking lots.  Good.....glad to see we are trying to improve air quality for the future when more people drive electric or hybrid cars.
1135-46	AIR-8: High-Efficiency Equipment and Fixtures. Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City of Santee that the applicant will utilize high-efficiency equipment and fixtures that exceed 2016 California Green Building Standards Code and 2019 Title 24, Part 6 energy conservation standards by 14 percent. When the standards are updated, the applicant shall use high-efficiency equipment and fixtures meeting or exceeding the latest standards  Please describe what types of equipment and fixtures are being referred to here?

Construction equipment maintenance requirements as specified in Mitigation Measure AIR-4 will be included in the contract with the contractor. The contractor will be responsible for maintaining the construction equipment in good operating condition as specified in Mitigation Measure AIR-4. Construction contractors use maintenance logs to document all engine work, repairs, tune-ups, oil changes and other equipment maintained activities. The maintenance logs are used documentation of the maintenance that has occurred. The City will verify these condition by periodically inspecting the maintenance logs for compliance as part of verification and enforcement of the MMRP.

**1135-43:** This comment focuses on Mitigation Measure AIR-5: Use of electricity during construction and asks what the source of the electricity, how will the contractor be billed, and who will inspect to ensure generators are not in use. Mitigation Measure AIR-5 states that when on-site electricity is available, contractors will rely upon the electricity infrastructure at the construction site rather than electrical generators powered by internal combustion engines. San Diego Gas and Electric (SDG&E) will provide the electricity through temporary power meters. The question of who will be billed for the power is not relevant to air quality impacts or the CEQA analysis. The City will specify this requirement as a condition of approval on the proposed project. As stated

in Mitigation Measure AIR-5, this requirement will be included in contract specifications and included in construction documents such as grading plans for review and approval by City staff prior to approval of grading permits or other construction permits. City building inspectors will inspect the site and verify that once temporary power meters are onsite construction activities do not include the use of electrical generators powered by internal combustion engines. Inspections and verification will be documented in the MMRP.

**I135-44:** This comment focuses on Mitigation Measure AIR-6: Transportation Demand Management (TDM) and asks how HomeFed will ensure car-sharing, ride-sharing, commuter trip reduction marketing, and school carpool will continue after construction and who will be responsible for continuing these programs after HomeFed is no longer involved. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

This comment also opines that 6,000 additional trips on City streets will have a detrimental effect. Section 4.16, Transportation, in the EIR analyzes the potential for the additional vehicles from the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy

addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation to the extent feasible in accordance with the CEQA Guidelines Section 15126.4.

**I135-45:** This comment reiterates Mitigation Measure AIR-7: On-Site Electric Vehicle Charging Stations and provides an opinion that it is a good measure. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-46:** This comment focuses on Mitigation Measure AIR-8: High Efficiency Equipment and Fixtures, and asks for a description of the types of equipment and fixtures that will be used. Mitigation Measure AIR-8 requires that the residential and non-residential buildings exceed the 2016 California Green Building Standards Code, and 2019 Title 24, Part 6 energy conservation standards by at least 14 percent. The mitigation measure does not specify specific equipment or fixtures needed to comply but examples include heat pumps rather than conventional HVAC systems, Energy Star rated appliances, LED lights, increased insulation in the building envelop, cool roofing that reflects heat rather

than absorbs it. The mitigation measure does not provide specific design criteria and is meant as a programmatic mitigation requiring overall energy efficiency improvements compared to current building standards. The proposed project includes conditions of approval requiring the building designs to be at least 14 percent more efficient than current building standards. City Plan check and City review and approval as part of the building permit process will be used to ensure that all buildings within the proposed project meet this criteria. The City will not issue a building permit until the criteria is met.

1135-47	<p>AIR-9: Low-Volatile Organic Compound Coating. Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City of Santee that the proposed project will comply with the San Diego Air Pollution Control District's Rule 67.0.1, Architectural Coatings, and use paints with no more than 50 grams of volatile organic compound per liter of coating. The applicant shall use water-based paints when possible. In addition, to reduce the exterior area of the buildings that needs to be repainted, when possible, the applicant shall use construction materials that do not require painting or pre-painted construction materials. Furthermore, the applicant shall use low-volatile organic compound cleaning supplies to reduce volatile organic compound emissions from area sources. This requirement shall be included in the construction contractor's contract specifications and project construction documents, which shall be reviewed and approved by the City of Santee prior to issuance of a construction permit.</p> <p>Who/what agency will ensure this requirement is met?          Will there be a physical visit to the site to check this out?          How often will this be monitored?          What are the consequences if requirements are not met?</p>
1135-48	<p>Cumulative Increase in Criteria Pollutant Emissions          The proposed project would result in a significant net increase in criteria pollutant emissions during construction and operation.          AIR-1 through AIR-10 (see above), GHG-4 (see below).          I couldn't find GHG-4</p>
1135-49	<p>Sensitive Receptors Construction and operation of the proposed project would potentially expose sensitive receptors to substantial pollutant concentrations          AIR-11: Construction Buffer Area. The City of Santee shall require the applicant to complete Phase 1 earthmoving and paving activities within 300 feet from the southwestern corner of the Village Center in Fanita Commons before any residents occupy the Village Center. The applicant shall also integrate the Phase 2 grading and utilities activities within 500 feet from the southwestern corner of the Village Center into Phase 1 so that activities are complete prior to occupation of the Fanita Commons Village Center.</p> <p>Who/what agency will keep tabs on this to be sure homes aren't occupied before they should be?          What are the consequences to the contractor/HomeFed if homes are occupied prior to requirements being met?</p>
1135-50	<p>AIR-12: New Source Review. The City of Santee shall require the applicant to avoid siting new on-site toxic air contaminant sources in close vicinity of residences and schools. Gasoline-dispensing facilities with a throughput of less than 3.6 million gallons per year must have the gasoline dispensers at least 50 feet from the nearest residential land use, daycare center, or school. In addition, gasoline-dispensing facilities with a throughput of 3.6 million gallons per year or more, distribution centers, and dry cleaning operations are prohibited within the project.</p> <p>Who/what agency will inspect the site to ensure requirements are met?          How often will inspections occur?          What will be done if violations are found? A fine, or stop construction until issue is resolved? or both?</p>
1135-51	<p>Odors: The proposed project would not result in emissions leading to odors that would affect a substantial number of people.</p> <p>What agency determines this?          On what basis, since construction hasn't begun, can they make this determination? Odors might not be an issue if the contractor follows all requirements. What if he/she doesn't?          Will complaints by Santee citizens be taken seriously if odors should become an issue? Who will be responsible for addressing any issues related to odors if/when they occur during FR construction?</p>

**1135-47:** This comment focuses on Mitigation Measure AIR-9: Low-Volatile Organic Compound (VOC) Coatings and asks who will ensure this is met, will there be a physical inspection, how often will this be monitored, and what are the consequences if the requirements are not met.

Mitigation Measure AIR-9 requires the use of low-VOC paints and coatings as part of the construction of buildings and infrastructure within the Fanta Ranch Project. The City through conditions of approval and the MMRP will ensure these requirements are met. This process includes plan check to ensure that construction plans include only low VOC paints and coatings prior to building permits being issued. Building inspectors go onsite during construction to ensure that low VOC paints and coating are used, and the MMRP documents these inspections. Inspections will occur whenever construction activities require building inspection sign off before construction can continue. If violations occur, the building inspector will not sign off on the construction until the paint or coatings are replaced with low-VOC paints or coatings.

**1135-48:** The comment states that they could not find GHG-4. Mitigation Measure GHG-4 is provided in Section 4.7.5 of the EIR. Mitigation Measure GHG-4 states the following:

GHG-4: Prior to the issuance of building permits, the applicant or its designee shall provide evidence to the City

of Santee that the project will include all-electric homes. No natural gas shall be provided to the residential portion of the project.

**I135-49:** This comment focuses on Mitigation Measure AIR-11: Construction Buffers and asks who will keep tabs to ensure that homes are not occupied before they should be and what are the consequences to the contractor if homes are occupied prior to the requirements being met. Mitigation Measure AIR-11 requires that phase 1 earthmoving and paving activities within 300 feet of the southwestern corner of the Village Center in Fanita Commons be completed prior to residents occupying the Village Center. This mitigation measure also requires that the planned Phase 2 grading within 500 feet the southwestern corner of the Village Center be graded during Phase 1. These buffers ensure distance between newly occupied residential units and the ongoing construction activities within the proposed project. The City will ensure that this mitigation measure is implemented through verification of the MMRP, plan check review and certificates of occupancy. The City will not issue certificates of occupancy for residential units in the Village Center the criteria in the measure is met. City building inspection will occur onsite to ensure that all grading, excavation, and paving activities are completed prior to signing off and allowing the City to issue certificates of occupancy. Because the City will not issue certificates of



occupancy until this mitigation measure is met, a violation would not occur.

**I135-50:** This comment focuses on Mitigation Measure AIR-12: New Source Review which requires limitations on the capacity of gasoline service stations and minimum setbacks between the gasoline service station and residential properties and the school to ensure that benzene emissions are not a health risk. The comment asks who will inspect the site to ensure the requirements are met, how often inspections will occur, and what will be done if violations are found.

Mitigation Measure AIR-12 would be implemented during the plan check approval process. If an application for a gasoline service station within the proposed project is received, the City will review the plans to ensure that the capacity of the gasoline service station is designed through tank size to be at or below the capacity limits (3.6 million gallons per year) and that the gasoline service station has at least a 50-foot setback from any residential property or school. Once the site plan for a gasoline service station is approved, building inspectors will inspect onsite to verify that the tank sizes and setbacks are in compliance with this mitigation measure.

Mitigation Measure AIR-12 also prohibits dry cleaning operations and distribution centers within the proposed project. These prohibitions are in the conditions of approval for the proposed project and the City would deny any permit

application for either dry cleaning operations or distribution centers within the proposed project if an application was submitted for these uses.

Violations will not occur because the criteria for this mitigation measure will be met during the application process and design review will be conducted by the City.

**I135-51:** This comment focuses on odor and asks who determined that the proposed project will not generate odors effecting a substantial number of people. The City made this determination based upon the onsite sewer system design and the nature of the project (mix of residential and commercial uses).

The comment states that odors might not be an issue if the contractor follows all requirements, but what if they don't and asks if odor complaints will be taken seriously if odors become an issue. Building inspectors will be onsite during construction activities to ensure that the contractors are following all the requirements and to inspect their work. These inspections would occur at each phase of construction (pad development, foundation installation, framing, building, painting etc.) and signed off or issued lists of items that need to be completed before sign off. Note that some odors typical of construction such as equipment exhaust, paving odors, painting odors would occur and are allowed.

	<p>Candidate, Sensitive, or Special-Status Species Implementation of the proposed project would have direct and indirect impacts on candidate, sensitive, or special-status plant or wildlife species that occur within and in the vicinity of the project site.</p>
1135-52	<p>Special-Status Species BIO-1: Preserve Management Plan. Within the on-site Habitat Preserve, the applicant shall preserve in perpetuity a total of 1,650.38 acres of on-site Multiple Species Conservation Program (MSCP) open space including: 1,518.50 acres currently within the Habitat Preserve (including 1,448.84 acres of sensitive upland habitats), 10.52 acres of proposed trails, 6.88 acres of San Diego Gas &amp; Electric access road, and 114.47 acres of on-site temporary impacts that shall become part of the Habitat Preserve (see Mitigation Measure BIO-2, Upland Restoration Plan).</p> <p>Will the land designated for the 1,518.50 acres within the habitat preserve all be together (contiguous)?</p>
1135-53	<p>Preservation of on-site open space requires recordation of a Habitat Preserve conservation easement and in-perpetuity management by the Preserve Manager in accordance with a Preserve Management Plan, which would be funded by an endowment or other acceptable permanent funding mechanism. The Preserve Management Plan includes a combination of active and passive restoration programs to gradually increase biological resources within open space areas through periodic treatments, mainly involving seed application on a landscape level combined with weed control activities.</p> <p>Who is the Preserve Manager? HomeFed? FR homeowners assn.? How will the Endowment or other acceptable permanent funding mechanism be established? Where will the money come from? What is the difference between and ACTIVE and PASSIVE restoration program. Will money from the endowment pay for reseeded if necessary? Will money from the endowment pay for brush control?</p>
1135-54	<p>An example diagram of a Preserve Management Plan is included in the Biological Resources Report for the Fanita Ranch Project (Appendix D), Figure 6-1, Potential Restoration Treatment Areas, and an example diagram of the rotational hexagonal treatment areas is included as Figure 62, Habitat Treatment Areas, but the actual distribution of restoration and long-term treatment blocks shall be proposed within the Preserve Management Plan and the restoration plans. As shown in Appendix D, Figure 6-2, Conceptual Habitat Treatment Areas, the Habitat Preserve was divided into Zone A and Zone B. Zone A includes areas that will receive treatment on a rotational basis,</p> <p>What is meant by TREATMENT? Define the type of treatment and how often (on a rotational basis).</p> <p>whereas Zone B will receive as-needed treatment since this area of the Habitat Preserve is more intact than in Zone A.</p> <p>How will the determination be made? Who will make the determination? HOA? Will someone be in charge of the endowment?</p>
1135-55	<p>Each hexagon is approximately 12 acres and numbered 1 through 8, which represents the year that treatment activities will take place within that hexagon. This would be separate from the treatments occurring from restoration activities associated with the project's temporary impacts. Some of these treatments shall be directed to increase biological resources for specific Covered Species such as Quino checkerspot butterfly, Hermes copper butterfly, coastal California gnatcatcher, and coastal cactus wren. It is anticipated that gradual habitat enhancements shall focus on mapped disturbed habitat and mapped disturbed native vegetation communities such as coastal sage scrub and valley grasslands. The Preserve Management Plan addresses the salvage of individual plants of sensitive species from the project development impact footprint prior to construction and translocation into open space areas.</p> <p>Does this mean individual plants of sensitive species will be transplanted?</p>

**1135-52:** The commenter restates information contained in the EIR and asks whether or not the Habitat Preserve would be contiguous. As stated in EIR Section 4.3.7, Comparison of Proposed Project to 2007 Project, the majority of the Habitat Preserve is contained within an approximately 900-acre block of contiguous open space and connected to other preserves within the vicinity. Also, please refer to Thematic Response – Wildlife Movement and Habitat Connectivity. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1135-53:** The commenter restates information contained in the EIR and states a series of questions regarding the Preserve Management Plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, the City directs the commenter to Appendix P, Preserve Management Plan, of Appendix D, Biological Technical Report, of the EIR. As discussed in Section 1.4.1 of the Preserve Management Plan, the Preserve Manager would be an independent, third party, separate from the Homeowner’s Association (HOA), City, and developer. Initially, the developer would hire and fund the Preserve Manager; however, once the HOA is formed, it would gradually take over funding responsibility for the Habitat

Preserve management and the Preserve Manager position. The HOA would not direct, in any way, the activities of the Preserve Manager. As discussed in Section 1.4.2 of the Preserve Management Plan, a conservation easement or equivalent land protection mechanism (e.g., Restrictive Covenant) will be recorded for the Habitat Preserve. The project applicant is responsible for all Preserve Management Plan funding requirements, including direct funding to support the Preserve Management Plan start-up tasks and an ongoing funding source for annual tasks that is tied to the property to fund long-term Preserve Management Plan implementation. The project applicant would ensure funding for long-term management through assessments from the HOA, which will be guaranteed through a dormant Community Facilities District, or comparable funding mechanism pursuant to the 2008 U.S. Environmental Protection Agency Compensatory Mitigation Rule, to be used by the Preserve Manager to implement the Preserve Management Plan. Active restoration would include, but is not limited to, activities such as planting and/or seed of habitat, and weed control activities. Passive restoration would include, but is not limited to, habitat regrowth through natural processes. Restoration activities and brush management would be overseen by the Preserve Manager, in accordance with the Preserve Management Plan, and funded by the HOA once formed.

**I135-54:** The commenter restates information contained in the EIR and states a series of questions regarding the management of the Habitat Preserve. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, the City directs the commenter to Appendix P, Preserve Management Plan, of Appendix D, Biological Technical Report, of the EIR. As discussed therein, periodic treatments would mainly involve seed application on a landscape level, combined with weed control activities. As shown in Figure 6-2 of Appendix D, Biological Resources Technical Report, Zone A has been divided into hexagonal treatment areas number 1 through 8, which represent the year that treatment activities would take place within each hexagon. Zone B would receive as-needed treatment, determined by the Preserve Manager, since this area of the Habitat Preserve is more intact.

**I135-55:** The commenter restates information contained in the EIR and states two questions regarding the transplanted special-status plant species and replacement of sensitive plant species impacted by construction activities. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, impacts to narrow

endemic plant species would be mitigated with implementation of Mitigation Measure BIO-3, which requires adequate preservation of impacted species in accordance with the narrow endemic species policy identified in the Draft Santee MSCP Subarea Plan. Rather than replacement of narrow endemic species, the proposed project would satisfy this MSCP Subarea Plan conservation requirement through creation of the Habitat Preserve, which would preserve the required percentage of impacted species in perpetuity. Additionally, two special-status plant species (Coulter's saltbush and San Diego goldenstar) would require translocation of individuals and/or planting to meet the 80 percent conservation in take-authorized areas (Refer to Table 4.3-10 in the Biological Resources Technical Report [Appendix D] for additional information). The rare plant mitigation component of the Upland Restoration Plan (Appendix Q of Appendix D, Biological Resources Technical Report) discusses appropriate methods for plant salvage and/or growing and planting; in general, the impacted population of the sensitive plant shall be targeted for salvage and translocation in order to meet the 80% minimum translocation survival rate. Where this is not feasible, germination and growing of appropriate genetic stock shall occur and be planted on site in suitable receptor sites.

1135-55 cont.	Will sensitive species that are destroyed during construction be replaced with new plants?
	As outlined in the Preserve Management Plan (Appendix P of the Biological Resources Technical Report for the Fanita Ranch Project), at a minimum, the Preserve Management Plan addresses long-term, permanently funded management for the on-site open space that accomplishes the goal of maintaining appropriate, high-value native plant communities throughout the Habitat Preserve. The Preserve Management Plan addresses management and monitoring of vegetation communities through specific minimum survey and management requirements. MSCP-level monitoring is the responsibility of the City of Santee or designee.
1135-56	Has the City of Santee decided if a department within city govt. will provide MSCP-level monitoring, or will they hire a contractor? Who will monitor the contractor to be certain the Preserve Management Plan is being carried out accordingly?
	The Preserve Management Plan discusses appropriate signage and fencing to protect certain sensitive resources, trash receptacle placement, and bicycle access and speed limits within the Habitat Preserve. The Preserve Management Plan also designates and describes all permitted land uses and activities (e.g., trails and utilities) within the open space area and how impacts to preserved vegetation communities shall be avoided and minimized. The Preserve Management Plan includes long-term management and monitoring measures for four covered plant species (variegated dudleya, San Diego goldenstar, willow monardella, and San Diego barrel cactus) and one sensitive plant species (Coulter's saltbush) to maximize the likelihood of their long-term viability.
1135-57	Good!
	As identified in Table 4.3-9, temporary impacts to 116.45 acres (including on- and off-site areas) of sensitive upland vegetation communities are expected with project implementation. All on-site temporary impacts, totaling 114.47 acres, shall become part of the Habitat Preserve once restored, including 110.59 acres of on-site sensitive upland vegetation communities. BIO-2: Upland Restoration Plan. Temporary impacts to sensitive upland vegetation communities occurring in both on- and off-site improvement areas are anticipated to require a total of 130.21 acres of restoration. Temporary impacts shall require restoration in place. A 1:1 ratio of in-place restoration for impacts to native grassland areas [i.e., valley and needlegrass grassland (including disturbed)], in addition to a 1:1 ratio of preservation and/or creation of native grassland within the Habitat Preserve would satisfy the 2:1 mitigation ratio for impacts to native grassland outlined in Table 5-14 in the Draft Santee Multiple Species Conservation Program Subarea Plan. Restoration and creation of native grassland will have the added benefit of increasing suitable habitat for grasshopper sparrow. Temporary impact areas shall be restored to the appropriate native vegetation community type. In order to determine the appropriate restored habitat, the Upland Restoration Plan includes an evaluation of restoration suitability specific to proposed vegetation types, soil preparation, plant palettes, irrigation, erosion control, maintenance and monitoring program, and success criteria. All areas shall be monitored for a minimum of 5 years to maximize the likelihood of establishment of intended plant communities.  If temporary impact areas are not considered appropriate for restoration of the sensitive native plant community that originally was mapped in that area, these areas shall be considered permanently impacted and mitigated in conformance with mitigation ratios for permanent impacts to sensitive upland vegetation communities as outlined in Mitigation Measure BIO-1, Preserve Management Plan.  In plain English, what does the above sentence mean?
1135-58	4.17.1 Environmental Setting 4.17.1.1 Water
1135-59	The proposed project is in the water service boundary of PDMWD. One hundred percent of PDMWD's potable water supply is imported through the San Diego County Water Authority (SDCWA). The SDCWA is 1 of 26 Metropolitan Water District of Southern California (Metropolitan) member agencies and is the largest Metropolitan member agency in terms

Additionally, impacts to oak trees would be mitigated as required by Mitigation Measure BIO-4, which requires a restoration ratio of 3:1; that is, three established sleeve-sized seedlings for each mature tree impacted. The oak tree restoration would be included as a component of the Wetland Mitigation Plan, included as Appendix S of Appendix D, Biological Resources Technical Report.

**1135-56:** The commenter restates information contained in the EIR and states a series of questions regarding management of MSCP-level monitoring of the Habitat Preserve. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, the City directs the commenter to Appendix P, Preserve Management Plan, of Appendix D, Biological Resources Technical Report, of the EIR. As discussed in Section 1.4.1 of the Preserve Management Plan, the Preserve Manager would be an independent, third party, separate from the Homeowner's Association (HOA), City, and developer. Furthermore, when the Draft Santee MSCP Subarea Plan is approved, the City would assume management responsibility for Habitat Preserve lands within the City limits pursuant to the Santee Subarea Plan and the Implementing Agreement for the Santee MSCP Subarea Plan. However, even without finalization and approval of the Santee MSCP Subarea Plan the City's

responsibilities for the Fanita Ranch Habitat Preserve would still apply, as discussed in the Preserve Management Plan (Appendix P of Appendix D). The City would be required to oversee implementation of the Preserve Management Plan through the review of annual reports and on-site inspections, and to coordinate with regional information gathering efforts. The City would support enforcement needs recommended by the Preserve Manager through appropriate law enforcement actions and adoption of appropriate City codes and ordinances that implement the Draft Santee MSCP Subarea Plan.

As stated in Appendix P, Preserve Management Plan, Section 1.4.5, Preserve Management Plan Agreement, the City will also require a separate agreement with the applicant who is preparing the Preserve Management Plan. The Preserve Management Plan Agreement will be executed at the time the City accepts the Final Preserve Management Plan. The Preserve Management Plan Agreement will obligate the applicant to implement the Preserve Management Plan and provide the source of funding to pay the cost to implement the Preserve Management Plan in perpetuity. The Preserve Management Plan Agreement will also provide a mechanism for the funds to be transferred to the City if the Preserve Manager fails to meet the goals of the Preserve Management Plan.



**I135-57:** The commenter restates information contained in the EIR and the comment expresses the opinions of the commenter and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I135-58:** The commenter restates information contained in the EIR and asks a question regarding temporary impacts discussed Mitigation Measure BIO-2. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

Nonetheless, the City provides the following clarification: if temporary impact areas are not suitable for in-place restoration, then these impacts would be treated as permanent impacts. As such, mitigation ratios for permanent impact areas would apply, in accordance with Mitigation Measure BIO-1, rather than Mitigation Measure BIO-2. It should be noted that there is a surplus of approximately 145.51 acres in the Habitat Preserve that would be available to accommodate these additional permanent impacts, if deemed necessary.

**I135-59:** This comment cites to Section 4.17.1.1 of the EIR and states that water will be provided to the Weston

development as well as all new homes around the City of Santee (City) currently or in the near future. The commenter asks for a description of the State Water Project (SWP), the amount of water received from the SWP, and how water will support an additional 6,000 people two years after water consumption was cut due to drought.

The SWP is a water storage and delivery system of reservoirs, aqueducts, power plants and pumping plants extending more than 700 miles. It supplies water to more than 27 million people in northern California, the Bay Area, the San Joaquin Valley, the Central Coast and southern California. SWP water also irrigates about 750,000 acres of farmland, mainly in the San Joaquin Valley. The primary purpose of the SWP is water supply. SWP was designed to deliver nearly 4.2 million acre-feet of water per year. Water is received by 29 long-term SWP Water Supply Contractors who distribute it to farms, homes, and industry. Water supply depends on rainfall, snowpack, runoff, water in storage facilities, and pumping capacity from the Delta, as well as operational constraints for fish and wildlife protection, water quality, and environmental and legal restrictions. (<https://water.ca.gov/Programs/State-Water-Project>, July 2020.)

As provided in Section 4.17.1.1 of the EIR, Padre Dam Municipal Water District (PDMWD) receives one

hundred percent of its potable water supply from the San Diego County Water Authority (SDCWA), which purchases water from the Metropolitan Water District of Southern California (Metropolitan), obtains transfers of conserved agricultural water from Imperial Irrigation District, and operates the Carlsbad Desalination Plant. Metropolitan's water supply obtained from the SWP is described in Section 3.2, State Water Project, of Metropolitan's 2015 Urban Water Management Plan (UWMP). (Also, refer to SDCWA 2015 UWMP, Section 6.2.2, State Water Project.) Metropolitan's 2015 UWMP, Metropolitan's 2015 Integrated Water Resources Plan (IRP) Update, SDCWA's 2015 UWMP, and PDMWD's 2015 UWMP all took into account the state of emergency due to drought in 2014, as well as Executive Order B-29-15, issued in April 2015, instituting emergency actions and water use restrictions for California. (Refer to Section 4.17.1.1; Section 5, Existing and Projected Supplies, Appendix O3.) Accordingly, the water supply analysis contained in the EIR and the Water Supply Assessment (Appendix O3) is accurate and accounts for prior drought conditions when estimating supplies necessary to serve the project. No change to the EIR is required.

1135-59 cont.	<p>of deliveries, purchasing approximately 25 percent of the Metropolitan water delivered in Fiscal Year 2018/2019. The 24 member agencies composing the SDCWA, including PDMWD, purchase water from the SDCWA for retail distribution within their service areas. The purchased treated water from the SDCWA is treated at multiple treatment plants including: Metropolitan's Skinner Treatment Plant near Temecula, California; SDCWA's Twin Oaks Valley Water Treatment Plant in the City of San Marcos; and the Helix Water District's Levy Water Treatment Plant in the unincorporated community of Lakeside through capacity owned by the SDCWA. Treated water is then conveyed to PDMWD through the SDCWA's regional aqueduct system. The water sources upon which Metropolitan draws to provide water to the SDCWA, which in turn is provided to SDCWA's member agencies, including PDMWD, include the Colorado River and the State Water Project (SWP).</p> <p>What is the State Water Project?          What is the percentage of water we use that is received from them?          What has changed since we were required to reduce our water consumption by 20% a couple of years ago?          How is it that we had to cut consumption due to the drought, but now we have enough water to support an additional 6,000 people 2 years later?          We will also be providing water to residents of the Weston development (in progress) across from West Hills High School...approximately 450 homes.          We will be providing water to all the new homes that are being built around Santee currently or in the near future.</p>
1135-60	<p>PDMWD's 2015 Urban Water Management Plan (UWMP), SDCWA's 2015 UWMP, Metropolitan's 2015 UWMP, and Metropolitan's Integrated Water Resources Plan (IRP) 2015 Update describe water supplies available for the proposed project. Metropolitan obtains supplies from local sources, including the Colorado River, via the Colorado River Aqueduct, which it owns and operates, and the Sacramento-San Joaquin Delta, via the SWP. The Metropolitan 2015 UWMP discusses the availability of these existing supplies and additional supplies necessary to meet future demands. Metropolitan's 2015 UWMP explains that "Metropolitan has supply capabilities that would be sufficient to meet expected demands from 2020 through 2040 under single dry year and multiple dry year hydrologic conditions, as well as average year hydrologic conditions" (Metropolitan 2016a).</p> <p>How can this be?          Where was all this extra water 2 summers ago?          What if we don't get a sufficient supply of rain or snow in any given year?</p>
1135-61	<p>Metropolitan is expected to have a surplus of water with the minimum amount of surplus being 145,000 acre-feet per year (AFY) during the Multiple Dry Year scenario.</p> <p>The "Multiple Dry Year scenario" sounds like a title of a survey or report of some sort. Again, how can it be that we will have an apparently unending supply of water to provide to the additional people?</p>
1135-62	<p>The IRP 2015 Update, developed by Metropolitan, incorporates a balanced approach to stabilize traditional imported water supplies while continuing to evolve local supplies to assure 100 percent reliability for fullservice demands at the retail level.</p> <p>By what means will we continue to EVOLVE LOCAL SUPPLIES? How will this be done?</p>
1135-63	<p>The IRP 2015 Update establishes regional targets for conservation, local supplies, SWP supplies, Colorado River supplies, groundwater banking, and water transfers. The IRP 2015 Update observes long-term planning for additional future resources, such as stormwater capture and seawater desalination, to minimize water shortages and restrictions (Metropolitan 2016b).</p> <p>The IRP 2015 Update is 5 years old? This was around when we had to curb our water usage 2 summers ago?</p>

**1135-59:** This comment cites to Section 4.17.1.1 of the EIR and states that water will be provided to the Weston development as well as all new homes around the City of Santee (City) currently or in the near future. The commenter asks for a description of the State Water Project (SWP), the amount of water received from the SWP, and how water will support an additional 6,000 people two years after water consumption was cut due to drought.

The SWP is a water storage and delivery system of reservoirs, aqueducts, power plants and pumping plants extending more than 700 miles. It supplies water to more than 27 million people in northern California, the Bay Area, the San Joaquin Valley, the Central Coast and southern California. SWP water also irrigates about 750,000 acres of farmland, mainly in the San Joaquin Valley. The primary purpose of the SWP is water supply. SWP was designed to deliver nearly 4.2 million acre-feet of water per year. Water is received by 29 long-term SWP Water Supply Contractors who distribute it to farms, homes, and industry. Water supply depends on rainfall, snowpack, runoff, water in storage facilities, and pumping capacity from the Delta, as well as operational constraints for fish and wildlife protection, water quality, and environmental and legal restrictions. (<https://water.ca.gov/Programs/State-Water-Project>, July 2020.)

As provided in Section 4.17.1.1 of the EIR, Padre Dam Municipal Water District (PDMWD) receives one hundred percent of its potable water supply from the San Diego County Water Authority (SDCWA), which purchases water from the Metropolitan Water District of Southern California (Metropolitan), obtains transfers of conserved agricultural water from Imperial Irrigation District, and operates the Carlsbad Desalination Plant. Metropolitan's water supply obtained from the SWP is described in Section 3.2, State Water Project, of Metropolitan's 2015 Urban Water Management Plan (UWMP). (Also, refer to SDCWA 2015 UWMP, Section 6.2.2, State Water Project.) Metropolitan's 2015 UWMP, Metropolitan's 2015 Integrated Water Resources Plan (IRP) Update, SDCWA's 2015 UWMP, and PDMWD's 2015 UWMP all took into account the state of emergency due to drought in 2014, as well as Executive Order B-29-15, issued in April 2015, instituting emergency actions and water use restrictions for California. (Refer to Section 4.17.1.1; Section 5, Existing and Projected Supplies, Appendix O3.) Accordingly, the water supply analysis contained in the EIR and the Water Supply Assessment (Appendix O3) is accurate and accounts for prior drought conditions when estimating supplies necessary to serve the project. No change to the EIR is required.

The Metropolitan IRP 2015 Update incorporates the following three elements to achieve a balance in resource planning (Metropolitan 2016b): 1. Planning for the future comes with uncertainty as unforeseeable challenges and risks may occur. Metropolitan considers positive and negative situations to analyze in what way supplies can affect future circumstances. The IRP 2015 Update development process provided Metropolitan an opportunity to observe potential challenges and risks identifying nearly 200,000 acre-feet of additional water conservation and supplies. 2. Water agencies develop plans to analyze and prepare for future water supply. Future Supply Actions are necessary actions to prepare for water supply conditions that differ from the original plan, such as water-saving technologies, land acquisition, and new supply alternatives. This action will allow agencies to consider innovative water alternatives for an unforeseeable future. 3. Adaptive water management is an approach for water purveyors to better prepare for the agency's future. Although strategies are established in the present, adaptive management is a quick and cost-effective method for unanticipated events. A history of drought-related supply shortages provoked Metropolitan to seek alternative supplies despite the long-term water strategy established in Southern California. Using this balanced approach will help ensure that the Southern California region, including San Diego County, will have adequate supplies to meet future demands while adapting to evolving conditions. The resource targets for Metropolitan's UWMP include the IRP 2015 Update and planned supply and demand projections developed in collaboration with member agencies. Metropolitan's UWMP contains a water supply reliability assessment that includes a detailed evaluation of the supplies necessary to meet demands over a 25-year period in average, single dry year, and multiple dry year periods. As part of this process, Metropolitan also uses regional growth forecasts from the Southern California Association of Governments and San Diego Association of Governments (SANDAG) to calculate regional water demands for the SDCWA's service area. Metropolitan's UWMP also takes into account the impacts of global climate change on its water supply, using hydraulic studies to predict the impacts on its water supplies, and incorporates steps to offset the effects of climate change on water supply, including drought response actions. Continuing planning and disputes concerning the Sacramento-San Joaquin Delta, from which Metropolitan's SWP supplies are conveyed, have the potential to affect the SWP component of Metropolitan's supplies. While these developments create some uncertainty regarding future supplies, ...." that uncertainty is currently speculative and has yet to impose any actual operational constraints on the SWP that would affect Metropolitan's supplies." Climate change: It has been very hot on earth these past few years, and getting hotter. Heat causes water to evaporate. People in the Salinas Valley have complained that they are being shortchanged on water supplies. All of these things can potentially affect Santee's ability to have a sufficient water supply. We must not be complacent because the 'uncertainty is currently speculative'...

Metropolitan's supplies also include an Intentionally Created Surplus from conservation and a System Efficiency Intentionally Created Surplus from facility improvements, both of which leave water stored in Lake Mead (operated by the U.S. Bureau of Reclamation), which can be imported by Metropolitan as surplus supply in dry years. Metropolitan is prioritizing the development of water supply reliability, taking into consideration the current supplies available from the SWP and actions taken to ensure a reliable water supply (Metropolitan 2016a).

In addition to the water that the SDCWA purchases from Metropolitan, the SDCWA obtains transfers of conserved agricultural water from Imperial Irrigation District. Additionally, the SDCWA began operation of the Carlsbad Desalination Plant in late 2015, delivering nearly 50 million gallons per day (mgd) (56,000 AFY) of potable water to its member agencies.

1135-64

How much water is Santee receiving from the desalination plant?

1135-65

As of May 2019, the Carlsbad Desalination Plant received approval to increase the production of potable water from desalination from 50 mgd to 60 mgd (67,000 AFY). This source was not accounted for in SDCWA's 2015 UWMP (SDCWA 2016), which projected supply from the Carlsbad Desalination Plant at 50,000 AFY through 2040. This potential increased capacity could be placed into service prior to 2025. SDCWA's 30-year 2012 Water Purchase Agreement provides that the SDCWA will purchase the entire output from the Carlsbad Desalination Plant. The SDCWA also produces a small amount of groundwater. Further information regarding the Metropolitan and SDCWA water supplies, including conservation and

**1135-60:** The comment cites to Section 4.17.1.1 regarding water supply and questions the adequacy of Metropolitan's supply capabilities and what happens if a sufficient supply of rain or snow is not obtained in any given year.

Water Code sections 10910 et seq., commonly referred to as Senate Bill 610 (SB 610), requires the preparation of a Water Supply Assessment (WSA) for certain new development projects. (See Water Code §§ 10910(a), 10912.) As stated in SB 610, the purpose of a WSA is to determine whether the "total projected water supplies available during normal, single dry, and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the public water system's existing and planned future uses, including agricultural and manufacturing uses." (Appendix O3, Section 1.) The WSA prepared for the proposed project evaluates the availability of sufficient water supplies to serve the proposed project and is based upon PDMWD's 2015 UWMP, SDCWA's 2015 UWMP, and Metropolitan's 2015 UWMP. Please refer to Appendix O3, Section 5, Existing and Projected Supplies for the sources of these documents.

The Urban Water Management Plans (UWMPs) relied upon in the WSA have been reviewed by the California Department of Water Resources (DWR) to ensure

requirements in the California Water Code have been addressed and acknowledged. As provided in Section 1, Purpose, Appendix O3, the Urban Water Management Planning Act, Water Code section 10610 et seq., requires urban water suppliers in California providing water for municipal purposes directly or indirectly to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually to prepare and adopt an UWMP at least once every five years. Among other things, the UWMP evaluates current and future water supplies and demands within a supplier's service area during normal, single-dry, and multiple-dry year periods over the next 20-year planning horizon and beyond, water supply reliability, water conservation measures, and water shortage contingency planning. Cities, counties, water districts, property owners, and developers utilize the UWMP for their long-range water supply planning, including the preparation of WSAs.

The commenter specifically references Metropolitan's supply as described in Metropolitan's 2015 UWMP. Metropolitan's 2015 UWMP acknowledged that in 2014, Metropolitan received only 5 percent of its SWP contracted amount, and only 20 percent of its SWP contracted amount in 2015 due to historic drought conditions. (See Metropolitan 2015 IRP Update, Section 1.4, Current Conditions.) Tables 2-4, 2-5 and 2-6 from Metropolitan 2015 UWMP describe Metropolitan's

Single Dry-Year, Multiple Dry-Year, and Average Year supply capability and projected demands. Metropolitan is expected to have a surplus of water with the minimum amount of surplus being 145,000 AFY during the Multiple Dry Year scenario. (Appendix O3, Section 5.) Accordingly, Metropolitan has accounted for water shortages and has analyzed single dry-year, as well as multiple dry-year conditions, which would occur if a sufficient supply of rain or snow as not obtained in a given year. No changes to the EIR are required.

**I135-61:** Commenter asks how it can be that we will have an apparently unending supply of water to provide to the additional people. Please refer to Appendix O3, as well as responses to comments I135-59 and I135-60, which address the same issue raised in this comment.

**I135-62:** The commenter asks how local water supplies can be evolved to assure 100 percent reliability for full service demands at the retail level. The IRP establishes regional targets for conservation, local supplies, SWP supplies, Colorado River supplies, groundwater banking and water transfers. The 2015 update to the IRP observes long-term planning for additional future resources, such as storm water capture and seawater desalination, to minimize water shortages and restrictions (see EIR, Section 4.17.1.1; Appendix O3, Section 5.1.). Please also refer to Section 4, An Adaptive Management Strategy, Metropolitan 2015 IRP, <http://www.mwdh2o>



[.com/PDF\\_About\\_Your\\_Water/2015%20IRP%20Update%20Report%20\(web\).pdf](http://www.metrowater.com/PDF_About_Your_Water/2015%20IRP%20Update%20Report%20(web).pdf), for specific actions Metropolitan is taking to ensure 100 percent reliability.

At the local level, the SDCWA is collaborating with its 24-member agencies to increase the amount of local water supply in the region. This will reduce the dependence on the Metropolitan's water supply. (Appendix O3, Section 5.3.1.) PDMWD, which services the proposed project, is currently in the process of planning to develop the East County Advanced Water Purification (ECAWP) that, if approved, would create a reliable local source of water. The purpose of the ECAWP Program, if implemented, is to generate enough purified water to minimize PDMWD's reliance on imported water supplies by up to 30% (Appendix O3, Section 5.3.2.). However, the ECAWP program would not be necessary for PDMWD to meet the demand associated with the proposed project but could provide an additional supply source for further water supply security to the proposed project and other PDMWD customers if it is implemented.

**I135-63:** The comment restates the description of the IRP 2015 Update found in Section 4.17.1.1 of the EIR and asks if the IRP 2015 Update was in place two years ago. The IRP 2015 Update was adopted in January 2016 and thus was around two years ago. The comment does not raise a significant environmental issue regarding the adequacy

or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-64:** The comment restates discussion found in Section 4.17.1.1 of the EIR and states that we must not be complacent because the ‘uncertainty is currently speculative.’ This statement does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

The commenter also asks how much water the City is receiving from the desalination plant. PDMWD, which services the City, including the project site, receives a portion of the output from the Carlsbad Desalination Plant as part of its purchased water from SDCWA. But neither SDCWA nor PDMWD is able to estimate a numerical value for that water. Carlsbad Desalination Plant output is delivered to SDCWA member agencies through two aqueducts containing five large diameter pipelines. SDCWA’s Board of Directors adopted guiding principles to make water from the Carlsbad Desalination Plant available to its member agencies, including PDMWD (see Appendix O3, Section 5.2).

**I135-65:** The commenter restates a portion of the discussion found in Section 4.17.1.1 and asks what is meant by the phrase “incorporate conservation.” Please refer to EIR Section 4.17.5.2, as well as Appendix O3, which cite to Section

drought contingency plans, supply uncertainties, and future plans for diversification and augmentation of supplies, is in Appendix O3.  
 In addition to the water supplied by the SDCWA (SDCWA acquired and Metropolitan provided), PDMWD's water supplies also include recycled water and a small amount of groundwater used to supplement the recycled system (PDMWD 2016).  
 1135-65 cont. Projecting future supplies and demands involves uncertainties. However, as discussed previously, in the WSA, UWMP, and other planning documents referenced, Metropolitan, SDCWA, and PDMWD have developed a number of water supply and management plans to improve long-term reliability, diversify supplies, reduce dependence on existing imported supplies, incorporate conservation, and account for uncertainties.  
 What is meant by the phrase above which states the water district will "incorporate conservation"? Does this mean curb our water usage again?

PDMWD currently serves a population over 100,000 persons and provides approximately 24,000 combined water, sewer, and recycled water service connections. The 85-square-mile service area is in the eastern section of the County of San Diego (County) and is divided into two service areas: Western Service Area and Eastern Service Area. The Western Service Area serves potable, wastewater, and recycled water to the City of Santee (City), including the proposed project, and parts of the City of El Cajon and the unincorporated community of Lakeside. The unincorporated County communities of Alpine, Blossom Valley, Crest, Dehesa, Flinn Springs, and Harbison Canyon are provided potable water service in the Eastern Service Area.  
 1135-66 Drinking water supplied by PDMWD meets or exceeds the public health requirements enforced by the State Water Resources Control Board's Division of Drinking Water and the U.S. Environmental Protection Agency. PDMWD's current infrastructure includes approximately 580 miles of water, wastewater, and recycled water pipe; 29 reservoirs; 16 pump stations; 4 lift stations; a wastewater recycling facility (WRF); and additional infrastructure. PDMWD's potable water system primarily consists of water storage facilities with a combined storage capacity of approximately 107.23 million gallons and 389 miles of transmission and distribution water mains. Pipelines in PDMWD's service area include a combination of asbestos cement pipe, polyvinyl chloride (PVC), and concrete cylinder pipe. Booster stations are distributed throughout the district area to pump water from lower pressure zones to higher pressure zones.  
 Since the proposed project will be primarily on the hills north of Santee, will it cost more to pump water to them?

The use of pressure reducing stations provides the ability to transfer water from higher to lower pressure zones to serve customers located in different pressure zones. In the Eastern Service Area, PDMWD is currently completing the Secondary Connection Project, comprising a new flow control facility that would provide a secondary supply from the SDCWA, a new aboveground storage tank, and new booster facility.  
 1135-67 What was the cost of the Secondary Connection Project, which included a new flow control facility, above-ground storage tank and booster facility?  
 How was this project funded?  
 How long from start of the project to completion?

4.17.1.5 Natural Gas Facilities  
 The SDG&E provides natural gas to the San Diego region, including the City. Natural gas facilities are not currently provided on the project site. The City is currently served with natural gas through underground gas mains within City streets.  
 1135-68 Who pays for the natural gas lines and electricity to be brought on to the FR project?  
 What is the estimated cost?

1135-69 4.17.1.7 Solid Waste

8: Water Shortage Contingency Planning of PDMWD's 2015 UWMP, setting forth PDMWD's conservation measures. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**1135-66:** This comment asks if it will cost more money to pump water to the proposed project in the hills of Santee. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. However, in terms of funding for PDMWD's projects, please refer to Section 5.3.1, Demonstrating the Availability of Sufficient Supplies, Appendix O3, which discusses PDMWD's Capital Improvement Program (CIP). The CIP is a five-year budget and business plan developed by the District to assess, maintain and improve pipelines, reservoirs, pump stations and other related facilities. The main objectives of a CIP are to evaluate and replace sewer and water infrastructure, conform to new mandates, and provide safe and dependable water and sewer facilities. The District's CIP projects are funded by the Capital Replacement Fund (CRF) and the Capital Expansion Fund (CEF). Per PDMWD's website, the CRF receives funding from rates paid by current water customers and developer capacity fees. The CEF is funded by the remaining portion of developer-paid capacity fees and

can only be used to fund projects required by growth. Certain District projects are reimbursed by the CRF and CEF. The CIP budget is updated annually to ensure the CIP is up to date with the projects in progress. Before a project can move forward, the project's budget must be approved by the Board. This allows the Board to review the projects with more insight on management of District finances. No further response is required.

**I135-67:** The comment cites discussion from Section 4.17.1.1 of the EIR and asks about cost, funding and duration of the Secondary Connection Project described in that section. The Secondary Connection Project is identified in Section 6.7.2, East County Regional Treated Water Improvement Program, in PDMWD's 2015 UWMP. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-68:** This comment asks who pays for the natural gas lines and electricity for the proposed project. The extensions of utilities to the project site would be the responsibility of the project applicant. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.



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

As of 2017, the waste disposal rate in California per resident was approximately 6.2 pounds per day and a recycling rate of 42 percent. The 2017 per-employee disposal rate was 11.9 pounds per day with a recycling rate of 62 percent (CalRecycle 2017). Currently, most of the waste collected in the City of Santee is disposed at the approximately 603-acre Sycamore Landfill in the eastern portion of the City of San Diego west of the project site. The project site is approximately 1 mile east of Sycamore Landfill. According to the Solid Waste Information System database maintained by the California Department of Resources Recycling and Recovery (CalRecycle), the landfill's maximum permitted capacity is approximately 147,908,000 cubic yards, with a current remaining capacity of approximately 113,972,637 cubic yards as of 2016. Based on the remaining capacity and disposal rates, the Sycamore Landfill is expected to remain open until December 31, 2042 (CalRecycle 2019).

1135-69 cont.

I have heard that, by law, the landfill cannot pile rubbish/trash, etc. higher than surrounding natural hills. Is this true? If yes, I can already see that the "hills" created by the landfill equipment are getting higher than the natural surrounding hills.

Assembly Bill 939  
 AB 939, the California Integrated Waste Management Act of 1989, establishes the current organization, structure, and mission of CalRecycle as an integrated waste management hierarchy that consists of the following (in order of importance): source reduction, recycling, composting, and land disposal of solid waste. AB 939 requires cities and counties in the state to reach a 50 percent waste reduction goal by the year 2000 and beyond.

1135-70

Is this just a goal, or has it been attained by the city of Santee?  
 Has the city of Santee reached and maintained this goal?  
 As the city's population grows, is there a proportionate increase in the calculating of the 50% waste reduction mandate?

It also requires counties to develop an integrated waste management plan that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve the waste diversion goals.

Is EDUCATION of the public part of the integrated waste management plan?  
 I live in a 300 unit condominium and all but one recycle dumpster was removed from our property because the residents kept putting trash in them. The trash company was fining the HOA, so the HOA had no choice but to remove the recycle dumpsters. If people would realize the benefits of recycling, perhaps they would not throw their trash in the improper dumpsters.

Assembly Bill 1826  
 In October 2014, Governor Brown signed AB 1826, Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. Organic waste means food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. Currently, businesses that generate 4 cubic yards or more of solid waste per week must have had an organic waste recycling program in place. Multi-family properties are regulated but only required to divert green waste and non-hazardous wood waste. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including certain multi-family residential units, starting on January 1, 2016. An exemption process is available for rural counties.

1135-71

I assume the above will apply to businesses in any large project such as FR. Who oversees that requirements are met?

**1135-69:** This comment asks if it is true that landfills cannot pile trash higher than the surrounding natural hills. The proposed project would not involve the operation of a landfill. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1135-70:** This comment asks if the City of Santee has attained the 50 percent waste reduction goal required by AB 939 and if there is a proportionate increase in the reduction mandate based on population increases. It also asked questions about AB 939 in relation to the commenter's condominium unit. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, Section 4.17, Utilities and Service Systems, specifically Section 4.17.5.5, analyzed the proposed projects impacts on compliance with solid waste regulations. The EIR concluded the proposed project would comply with applicable solid waste regulations and impacts would be less than significant. This issue is adequately addressed in the EIR.

This comment also asks if public education is part of the integrated waste management program. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

I135-71 cont. How often?  
What are the consequences if the law isn't followed?

Assembly Bill 1881  
AB 1881, the Water Conservation in Landscaping Act of 2006, requires the California Department of Water Resources to prepare an updated Model Water-Efficient Landscaping Ordinance (Model Ordinance) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were to adopt either the updated Model Ordinance or a local landscape ordinance that is at least as effective in conserving water as the Model Ordinance. The City adopted Ordinance No. 491 in December 2009. In response to further regulations from the state, the City amended its Landscape Regulations (San Diego Municipal Code, Chapter 14, Article 2, Division 4) and Landscape Standards in April 2016. The Landscape Standards implement the requirements of the Landscape Regulations. Landscape plans and installations are required to be in compliance with the Landscape Standards.

I135-72

Again, I assume the plans for FR include landscaping that will conserve water through efficient irrigation and landscaping.  
Will residents be able to plant what they choose in their own yards?  
Who will oversee, initially and on a continuous basis, that the law is followed in FR?

Senate Bills 221 and 610  
On January 1, 2002, SB 221 and SB 610 amended state law to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 221 requires water suppliers to prepare written verification that sufficient water supplies are planned to be available prior to approval of large-scale subdivisions. SB 610 requires water suppliers to prepare a WSA for land use agencies to include in the CEQA process for new developments subject to SB 610. SB 610 states that the assessment must evaluate water supplies that are or will be available during normal, single dry, and multiple dry years during a 20-year projection to meet existing and planned future demands, including the demand associated with the proposed project. The assessment includes, among other information, an identification of existing water supply entitlements, water rights, or other water service contracts relevant to the identified water supply for the proposed project and water received in prior years pursuant to those entitlements, rights, and contracts, and a description of the quantities of water received in prior years by the public water system.

I135-73

Again, how is it that two summers ago the State was in a massive drought and was requiring a 20% reduction in water usage by residents, and now we can add up to 3000 homes in our city (not counting all the other homes that are being built in every nook and cranny of Santee...) plus the 450+ homes that continue to be built across from West Hills High School. This does NOT make any sense to the normal, thinking person, but somehow the EXPERTS have managed to make it a reality?  
How many new homes are currently being built in Santee?  
How many additional new homes have been added since 2017?  
How many additional new homes have been REQUESTED to be built (other than FR)?  
How many additional newhomes have been APPROVED to be built in Santee?

I135-74

Senate Bill 1374  
SB 1374 seeks to assist jurisdictions with diverting their construction and demolition (C&D) waste material with a primary focus on CalRecycle developing and adopting a model C&D diversion ordinance for voluntary use by California jurisdictions. CalRecycle adopted such an ordinance at its March 16, 2004, meeting. In 2011, the City adopted an ordinance to promote the recycling of C&D debris to meet the City's obligations under AB 939 and the California Green Buildings Standards Code.  
Who/what agency oversees large projects to ensure the city of Santee's obligations under AB939 are met?

**I135-71:** This comment asks who will oversee the requirements of Assembly Bill 1826 and what are the consequences if the law isn't followed. Assembly Bill 1826 is a state law overseen by the California Department of Resources, Recycling, and Recovery. The City is required to comply with all applicable state laws.

**I135-72:** This comment asks if the plans for the proposed project include landscaping that would conserve water through efficient irrigation and landscaping. Section 3, Project Description, specifically Section 3.3.8, describes the proposed project smart growth and sustainability features, including water conservation and water quality principles.

This comment also asks if residents will be able to plant what they choose in their own yards and who will oversee this for the proposed project. The Covenants, Conditions and Restrictions (CC&Rs) for the residential component of the project will detail what is allowed and not allowed in residential yards. It will be enforced by the HOA. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I135-73:** The comment cites the discussion regarding Senate Bills 221 and 610 in Section 4.17.2 and asks how 3,000 homes can be added to the City when “two summers ago the State was in a massive drought and was requiring a 20%

reduction in water usage by residents.” The commenter is incorrect in asserting the 20 percent reduction was required two summers ago. Governor Brown declared a Drought State of Emergency on January 17, 2014, and called for a 20 percent water use reduction statewide. PDMWD established mandatory restrictions for a Drought Level 2 condition or higher in August 2014, and 20 percent water use restrictions for Drought Level 2: Drought Alert conditions are included in Section 8.1.2 of the PDMWD 2015 UWMP. PDMWD moved out of a Level 2: Drought Alert condition and back to Level 1: Drought Watch in June 2016. PDMWD is currently not experiencing drought conditions and conservation is voluntary. (<https://www.padredam.org/230/Drought, August 2020>.) Sufficient water supplies are available to serve the proposed project. Please refer to EIR Section 4.17.5.2 and Appendix O3 (Water Supply Assessment).

Additionally, the commenter asks how many new homes are currently being built, approved, or requested to be built in Santee and how many new homes have been added since 2017. Please refer to EIR Section 4.13, Population and Housing. Section 4.13.6.1, Cumulative Threshold 1: Inducement of Substantial Population Growth, as well as Table 4-2, Cumulative Projects, in Chapter 4, Environmental Impact Analysis, discuss cumulative housing projects in the City of Santee. No changes to the EIR are required.

I135-74 cont.	<p>How often? Continuously until the end of construction? What are the consequences if obligations are not met? Will city council members/city staff visit the site occasionally to be sure things are going according to regulations/law?</p>
I135-75	<p>Urban Water Management Planning Act (California Water Code, Division 6, Part 2.6, Section 10610 et. seq.) The Urban Water Management Planning Act was developed due to concerns for potential water supply shortages throughout California. It requires information on water supply reliability and water-use efficiency measures. Urban water suppliers are required, as part of the act, to develop and implement UWMPs to describe their efforts to promote the efficient use and management of water resources.</p>
	<p>Same questions as before.... What agency(ies) make these determinations? On what basis? What is the alternative plan if the city (and surrounding cities) run short of supply?</p>
I135-76	<p>4.17.2.3 Local Santee General Plan Divided into nine elements, the Santee General Plan is a statement of intent as to the future development of the City. This is accomplished through objectives and policies that serve as a long term policy guide for physical, economic, and environmental growth.</p>
	<p>What is the normal schedule for how often the General Plan (GP) is revisited and revised? If the GP is revised outside of the normal schedule for revision, what circumstance would generate the action? Who decides when/if the GP should be revised? Would Santee community members be allowed input prior to any change to the GP? Would that be at city council meetings? If not, where/when? What infrastructure changes and improvements would be required prior to consideration of a revision to the GP in order to accommodate approval of large developments?</p>
I135-77	<p>I see where the physical growth will be...up to 3000 additional homes attached to the city of Santee (in effect, a mini-city that will use our infrastructure to get in and out of their city). I also see the economic reasons for the desirability of FP. However, what is the long term policy guide for environmental growth? We are chewing up our environment by paving, cementing, covering our beautiful hills with houses. That is not environmental growth, that is destruction of the environment</p>
I135-78	<p>If the corona virus has taught us nothing, it has taught us that TOO MANY PEOPLE IN ONE PLACE enables the virus to spread more easily. How many people will it take before we have ENOUGH people in the city of Santee? Has anyone thought about how so many people living close together has/will affect our environment? From air quality, to water quality/availability, traffic, etc. It is always easier for the builder to build where all the conveniences already exist (memory of the attempt to build a power plant near the landfill several years ago). Why go out into the country where it will cost a fortune to bring in utilities, when you can just attach yourself to an existing city? Makes sense to me, but I don't think it's morally right. Money money money... Go for a walk in Mission Trails....you might just appreciate the environment a bit more.</p>
I135-79	<p>The Santee General Plan Land Use Element and Safety Element include provisions for utilities and service systems. Those objectives and policies include the following (City of Santee 2003): Land Use Element: Objective 3.0: Provide and maintain the highest level of service possible for all community public services and facilities. Policy 3.1: The City should ensure that land divisions and developments are approved within the City only when a project's improvements, dedications, fees and other revenues to the City and other agencies fully cover the project's incremental costs to the City and other agencies.</p>

**I135-74:** This comment asks what agencies oversee large projects to ensure the City’s obligations under Assembly Bill 939 are met, how often, and what are the consequences for non-compliance. Assembly Bill 1826 is a state law overseen by the California Department of Resources, Recycling, and Recovery. The City is required to comply with all applicable state laws.

**I135-75:** The comment restates the EIR’s discussion regarding the Urban Water Management Plan Act and asks what agencies make “these determinations,” their basis, and what happens if the City runs short of supply. Please refer to responses to comments I135-59 through I135-62 which address the same issues raised in this comment.

**I135-76:** This comment requests general processing information regarding General Plan revisions. Regarding the proposed project, the General Plan amendment is listed as a discretionary action in EIR Section 3.12. A description of the General Plan amendment and the project’s compliance with it is provided in Section 4.10, Land Use and Planning. The proposed project’s infrastructure improvements are identified in Section 3.4 and evaluated in the various sections of Chapter 4, Environmental Impact Analysis. The City Council is responsible for the approval of the proposed project, including the proposed General Plan amendment. The remainder of the questions in the comment do not apply



to the proposed project. Therefore, they do not raise a significant environmental issue regarding the accuracy or adequacy of the information provided in the EIR. Therefore, no further response is required.

**I135-77:** This comment offers opinions of the commenter. This comment does not raise a significant environmental issue regarding the accuracy or adequacy of the information provided in the EIR. Therefore, no further response is required.

**I135-78:** The comment asserts that too many people in one place allows the corona virus to spread more easily and questions how so many people living close together will affect our environment.

As provided in Section 4.13.5.1, Threshold 1: Inducement of Substantial Population Growth, the project site has been subject to land use planning for the past 40 years, indicating that it was planned for development even before it was part of the City. The number of residential units proposed on the project site has continued to vary over the years, with many proposals greater than the 2,949 residential units currently proposed, indicating that the project site has been intended for population growth by the City and the County for many decades. In addition, the proposed project would include a General Plan Amendment to change the designation of the project site from Planned

Development (PD) to Specific Plan (SP) and to increase the number of residential units on the site up to 2,949 with a school, which would be consistent with the Santee General Plan Housing Element, as amended (City of Santee 2013).

Construction of the proposed project is anticipated to begin in 2021 with a buildout of approximately 10 to 15 years. Thus, based on a conservative estimate and averaged over 10 years, the 7,974-person population increase would equate to approximately 797 new residents per year, which would be consistent with the City's historical population increases (Table 4.13-4). In the context of the housing shortage currently experienced by the state and the San Diego region, the provision of new housing on the project site would be considered growth accommodating and would represent a regional benefit.

Regarding COVID-19, Public Resources Code Section 21083(b)(3) and CEQA Guidelines Section 15065(a)(4) provide a project may have a significant effect on the environment if the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly. However, COVID-19 is not an environmental effect of the proposed project – it is already present in the population unrelated to project development. As a general rule, CEQA does not require an analysis of the impact of the existing environment on

a proposed project unless the project will worsen existing environmental hazards or conditions. *California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.* (2015) 62 Cal.4th 369, 377. The comment does not identify any physical effects within the purview of CEQA related to COVID-19.

The proposed project's potential environmental impacts are analyzed throughout the EIR. The commenter mentions air quality, water quality/availability, and traffic as potential impacts, but does not provide a specific allegation regarding the adequacy or accuracy of information provided in the EIR. Please refer to Section 4.2, Air Quality, Section 4.17 Utilities and Service Systems, and Section 4.16, Transportation, for a discussion of the air quality, water quality/availability, and transportation impacts of the proposed project. No further response is required.

**1135-79:** This comment asks what the dollar amount the applicant will pay and receive to get the project going and how much money will go directly to Santee. This comment raises an economic issue, which is not required to be considered per CEQA Guidelines, Section 15131. Therefore, no further response is required.

1135-79 cont. What is the approximate dollar amount in fees HomeFed will pay in order to get the project going?  
 What is the approximate dollar amount in other revenues HomeFed will pay in order to get the project going?  
 What are some examples of 'other revenues'?  
 How much of that money will go directly to the city of Santee?  
 What percentage of these fees/revenues will be collected prior to beginning the project?

1135-80 I am sure HomeFed will pay what they have to in order to get this project approved. They have probably already invested millions. The real COSTS (quality of life) will be shouldered by those of us who currently live in Santee. The cost of too many people living in a square foot. People are always in a hurry. Santee is hot in the summer = shorter tempers. Rush hour dropping kids off at schools...there are schools on two of the roads that will be used by FR residents....Magnolia and Cuyamaca.

1135-81 These costs are for providing new or upgraded capital improvements and other public facilities and equipment resulting from, and attributable to the project, which are necessary to protect and promote the public's health, safety and welfare and to implement feasible mitigation measures. Such facilities include, but are not limited to: parks, bridges, major roads, traffic signals, street lights, drainage systems, sewers, water, flood control, fire, police, schools, hiking/bicycle trails and other related facilities. In calculating benefits of land divisions and developments, the City may consider other public objectives and goals including social, economic (job creation, secondary economic benefits, etc.) and environmental factors. ☺

1135-82 JOBS:  
 How many jobs will be created for Santee residents during construction of the FR project?  
 Has HomeFed made any commitment to hire residents of Santee to work on the construction phase of the project?  
 If yes, what is that commitment?  
 If no, why not?  
 After construction is completed, approximately how many jobs will be created for Santee residents in FR businesses?  
 Will those jobs pay a living wage?

Social: Our city will be come approximately 25% more crowded if FR is approved as currently planned.  
 How does the city council reconcile the social benefit to a city that would potentially increase by 25% the use of roads and facilities, grocery stores, parks (we have to reserve a spot NOW, what would availability be with 6,000 more people living in Santee?)

1135-83 What will be FR's policy on usage of their parks and recreational facilities? Will they be on a reservation basis?  
 What will the cost be if reservations are required?  
 Will Santee citizens living outside FR be able to access all facilities. If not, what facilities/amenities will be available?  
 I know the trails are supposed to be available to anyone, but are things such as parks, playgrounds, swimming pools, etc. available to Santee residents who live outside FR?

1135-84 Specifically, what is the city of Santee's calculation of benefits to environmental factors should the FR project be approved?

1135-85 Flood control: Currently, when it rains, much of the rain can be absorbed by the land. After paving over the land to accommodate roads, sidewalks, houses, amenities, that water has to find a new place to go.  
 There is a flood channel that runs right behind my complex. Will flood control from FR be attached to Santee's current flood control channels?

1135-86 Policy 3.2: The City should encourage the development and use of recycled water for appropriate land uses to encourage the conservation of, and reduce demand for, potable water. ☺ Policy 3.6: Development projects shall be reviewed to ensure that all necessary utilities are available to serve the project and that any land use incompatibilities or impacts resulting from public utilities shall be mitigated to the maximum extent possible.  
 Approximately how many acres in FR will need irrigation (for brush control, etc.)?

**1135-80:** This comment offers opinions of the commenter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1135-81:** This comment lists a number of improvements to public facilities and equipment that may implemented by land divisions and developments such as the proposed project. Chapter 3, Project Description, specifically Section 3.4, identifies the proposed project improvements associated with many of these facilities. In addition, Section 4.14, Public Services, evaluates the population increase from the proposed project and the associated increase in demand for public services, including police protection, fire protection, schools and libraries. Section 4.14 addresses the existing public services conditions, identifies applicable regulations pertaining to the provision of public services, identifies and analyzes environmental impacts, and recommends mitigation measures to reduce or avoid adverse impacts anticipated from implementation of the proposed project, as applicable. Section 4.14 is based on service letters from the Santee Fire Department (SFD), the County of San Diego Sheriff Santee Station, the Grossmont Union High School District (GUHSD), and Santee School District (SSD). These letters are provided as Appendix M. Effects associated with recreational

services, such as parks, are evaluated in Section 4.15, Recreation. Section 4.16, Transportation, and Section 4.17, Utilities and Service Systems, identify and evaluate the proposed transportation and utilities improvements, respectively..

- I135-82:** This comment asks about jobs created by the proposed project and if they will pay a living wage. This comment also asks how the City will reconcile the social costs to increasing population. Please refer to response to comment I135-17 regarding jobs created under the proposed project. Regarding the social benefits, the Statement of Overriding Considerations for the proposed project would discuss how the public benefits of the project would outweigh the significant and unavoidable impacts.
- I135-83:** This comment asks what usage policies will be for the proposed project and if Santee residents will be able to access the parks and trails. The parks and trails on the project site would be open to the public. Section 3, Project Description, specifically Section 3.3.1.7, describes the access to parks on the project site. Usage policies would be dictated by the manager of the respective park, either the City or the homeowner's association.
- I135-84:** This comment asks what the City of Santee's calculation of benefits to environmental factors should the proposed project be approved. Please refer to

response to comment I135-82, which addresses the same issue raised in this comment.

**I135-85:** This comment asks if the flood control from the proposed project would be attached to Santee's current flood control system. Section 4.9, Hydrology and Water Quality, specifically Section 4.9.5.1, describes how the proposed storm drain system would be constructed to collect and convey on-site runoff as well off-site run-on from developed areas east of Fanita Parkway that confluences with the Fanita Parkway flows. However, instead of discharging into an open channel along the western side of Fanita Parkway as it currently does, confluence flows would be conveyed within a storm drain pipe within Fanita Parkway to an existing drainage. Cuyamaca Street and Magnolia Avenue would also be extended and improved to provide access to the project site. Similar to Fanita Parkway, these streets would also include Green Street design elements, such as rock gardens and tree wells.

**I135-86:** The comment restates Santee General Plan Policies 3.2 and 3.6 and questions how many acres in Fanita Ranch will need irrigation and whether the garden/vineyard would use potable water. Irrigation for the proposed project would total 285.66 acres, which equates to 465,615 gallons per day or 522 acre-feet per year, as shown in Table 4.17-3. Please refer to Appendix O3, Water Supply Assessment, Table 3-3 through Table 3-6.

Recycled water will not be available for irrigation use within the proposed project. Section 3.4.2.2 of the EIR (Recycled Water System/Advanced Treated Water) has been revised to further clarify that while recycled water used for construction of the proposed project would be available on a limited and seasonal basis, the use of recycled water for other uses would require treatment plant expansion and an additional pressure zone with an additional pump station and reservoir specific to Fanita Ranch. Instead, purified water produced from the East County Advanced Water Purification Program (ECAWP), if implemented, will be utilized for irrigation efforts and to promote low-impact developments and best management practices as indicated in PDMWD's Master Plan and City of Santee BMP Design Manual. If the ECAWP is not implemented, the project's irrigation needs will be met by potable water. Furthermore, water-efficient landscaping and weather-based irrigation controllers will be utilized. Landscape palettes designed for the community follow regulations established by Chapter 17.36 "Landscape and Irrigation Regulations" of the Santee Municipal Code (SMC) and the California Model Water Efficient Landscape Ordinance (MWELO) (Specific Plan Chapter 5.5).(Section 3.6, Water Conservation, Appendix O3; see also Section 4.17.5.2, Threshold 2: Water Supply Availability.)

I135-86 cont.	Will the garden/vineyard use potable water (since they are growing food for consumption by humans)?
	Safety Element # Policy 3.8: Promote safe, environmentally sound means of solid waste disposal for the community.
I135-87	What is the estimated tonnage of waste that will come out of FR per year after completion of the project? What is the estimated tonnage of recycling that will come out of FR per year after completion of the project?
	4.17.3 Thresholds of Significance According to Appendix G of the CEQA Guidelines, impacts to utilities and service systems would be significant if the proposed project would: Threshold 1: Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities which could cause significant environmental effects.
I135-88	Threshold 2: Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.  Again, I have real concerns about availability of water. Our community would increase in size by approximately 1/4...this is huge. Climate change is thus far both predictable and unpredictable. Will southern Calif. get enough rain to sustain us? Will the snow pack in the Sierras be enough? What if we have a lot of hot weather, and it melts more quickly than anticipated? What if people in the Salinas Valley need more water to grow crops for a continuously expanding population? So many things to consider. A critical issue.
I135-89	Threshold 3: Result in determination by the wastewater provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.  Water issue again...will FR ever expand to more than the currently planned (up to) 3008? Who will own the undeveloped land in FR? HomeFed? FR Homeowners' Assn.? City of Santee?
I135-90	Threshold 4: Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.  What agency will monitor trash coming out of FR to ensure it is not excessive? How will this be accomplished on an ongoing basis? Over time, FR residents will have children which means a higher volume of trash and recycling. Educate the population about the importance of recycling. Have programs in the schools (let's have the next generation care about the world they are inheriting).
I135-91	Threshold 5: Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.  What are the consequences/penalties if a city does not comply with regulations? If fines are levied, does the money come out of city of Santee general fund, or?
I135-92	4.17.4 Method of Analysis The analysis of utilities and service systems impacts is based on the Water Service Study, Sewer Study, and WSA (Appendices O1, O2, and O3) and the Private Residential Water Systems Memorandum detailing the proposed project's residential water system beyond the connection points from PDMWD's system (Appendix O4). The method of analysis includes performing hydraulic analyses using PDMWD's existing Innovyze InfoWater hydraulic water model and Innovyze InfoSWMM hydraulic sewer and stormwater model to evaluate the impacts of proposed project water demand as well as evaluate the proposed gravity sewer infrastructure for the proposed project. In addition, the impacts analysis is based on the service letter from Waste Management, Inc. (Appendix M). 4.17.5 Project Impacts and Mitigation Measures

**I135-87:** This comment asks what the estimated tonnage of waste and recycling that will come out of the proposed project per year. Section 4.17, Utilities and Service Systems, specifically Section 4.17.5.4, states the total waste generated for the proposed project would be approximately 30,710 pounds of municipal solid waste per day under the preferred land use plan with school and approximately 29,193 pounds of municipal solid waste per day under the land use plan without school.

**I135-88:** The comment restates the commenter's concerns regarding water supply. Please refer to responses to comments I135-59 through I135-62, which address the same issues raised in this comment.

**I135-89:** The comment questions whether Fanita Ranch will ever expand beyond the development proposed by the proposed project and who will own the undeveloped land within the project site. The proposed project encompasses approximately 2,638 acres of land located in the northern portion of the City (EIR Section 3.1, Project Location). Of the 2,638 acres within the project site, 1,650.4 acres will be set aside as a Habitat Preserve (see Table 3-1, Preferred Land Use Plan Project Component Summary in Section 3.3.1.10, Habitat Preserve). This natural open space outside of the development area would be dedicated to the City's Multiple Species Conservation Program (MSCP) for long-term protection and management (see Section 3.2, Project



Objectives). Accordingly, water usage will not increase beyond the developed footprint of the project site within the 1,650.4 acres that will be set aside as a Habitat Preserve.

**I135-90:** This comment asks what agency will monitor trash coming out of the proposed project and how this will be accomplished. Chapter 3, Project Description, specifically section 3.7, discusses the solid waste and recycling for the proposed project. The project would be served by Waste Management, Inc.

This comment also requests recycling education for the proposed project. The project applicant will take this under consideration.

**I135-91:** This comment asks what are the consequences or penalties if the City does not comply with solid waste regulations. The City is required to comply with all state solid waste regulations. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-92:** The comment restates a portion of the discussion in Section 4.17.4 and Section 4.17.5.1 of the EIR. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

1135-92 cont.	<p>4.17.5.1 Threshold 1: New or Expanded Utilities or Service Systems          Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities which could cause significant environmental effects?          Impact: Implementation of the proposed project would require the construction of new and expanded water, wastewater, drainage, electric power, natural gas, and telecommunications facilities, some of which could cause significant environmental effects.          Mitigation: Applicable mitigation measures from other resources topics including air quality; biological resources; cultural and tribal cultural resources; geology, soils, and paleontological resources; greenhouse gas emissions; noise; transportation; and wildfire in this EIR.          Significance Before Mitigation: Potentially significant. Significance After Mitigation: Significant and unavoidable with respect to air quality, noise, and transportation impacts. All other impacts would be reduced to less than significant.</p> <p>Impact Analysis          Water Infrastructure and Facilities Development of the project site would increase the demand for potable water to serve the proposed project site land uses. Water service for the proposed project would be provided by PDMWD. The proposed project would develop the currently undeveloped site with residential uses, along with parks, agricultural, commercial, office, retail, and service uses. To accommodate the development, the proposed project proposes to construct a new domestic water system consisting of transmission and distribution pipelines, two reservoirs that include tanks, and two pump stations to distribute potable water throughout the project site. Water from the existing Carlton Hills water tank and existing Cuyamaca water tank would provide water to the proposed project. Refer to Figure 3-11 for a depiction of potable water facilities that would supply potable water to the proposed project.</p>
1135-93	<p>At the beginning of construction, how will water be provided to the site? Water trucks? Carlton Hills and Cuyamaca water tanks?          Who will keep track of how much water is used?          Who will pay for it?          At what point will the FR onsite water tanks be built and filled?          How long would the water last in average daily use per household?</p>
1135-94	<p>The proposed water system would be a public water system throughout the project site, designed and installed per PDMWD and Santee Fire Department requirements. Some private hydrants would be installed on the project site in coordination with PDMWD.          AND THE SANTEE FIRE DEPARTMENT, I PRESUME.....</p>
1135-95	<p>The proposed project would require a redundant, or looped, water supply system for fire protection and system reliability.          Is this because the project is built on hillsides?          Is a looped system different from systems currently existing in Santee?</p>
1135-96	<p>Sixteen-inch water mains would be installed in Fanita Parkway and Cuyamaca Street and transition to 12-inch mains in Fanita Commons and Orchard Village and would be looped through the villages to provide adequate domestic and fire flow service in the event of a disruption of water supply from one of the mains. Pipelines in Fanita Commons and Orchard Village would be 12 inches in diameter, while pipelines in Vineyard Village would be 16 inches in diameter. The proposed project would make two connections to PDMWD's system: one at the intersection of Chaparral Drive and Cuyamaca Street to the Cuyamaca Tank, and one at the Carlton Hills Tank at the Gravity Zone.          As previously discussed in Section 4.17.1.1, the proposed project falls within three water pressure zones (880 Zone, 1230 Zone, and 629 Zone). Water would be conveyed from three existing facilities described in Section 4.17.1.1. The proposed project would connect to the existing 880 Zone in Cuyamaca Street and Magnolia Avenue. The proposed project would</p>

**I135-93:** The comment asks a series of questions related to how water would be provided to the site at the beginning of construction, monitoring, cost, and household use. Please refer to Section 3.3, Phasing, of the Water Service Study (Appendix O1); see also Section 3.4.2, Water Supply. Water demand for project construction and operation is addressed in Section 4.17.5 and the Water Supply Assessment (Appendix O3). The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-94:** The comment questions whether the private hydrants installed on the project site would be installed in coordination with the Santee Fire Department as well as PDMWD. Private hydrants also take into account Santee Fire Department requirements. Refer to Table 4-1, WAS Section 4.1-Criteria, of the Water Service Study (Appendix O1). The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-95:** The comment asks questions regarding the looped or redundant water supply system proposed for the project. After the Cedar Fire of 2003, extra precautions have been taken to ensure the water supply will not become deficient in case of emergency. Prevention measures

include the construction of additional pipelines, pump stations and reservoirs. Pump stations are sized to provide needed fire flow and equipped with backup generators to create redundant water supply for every pressure zone. Refer to Section 5.3.1, Demonstrating the Availability of Sufficient Supplies, of the Water Service Study (Appendix O3). The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I135-96:** The comment restates a portion of the discussion in Section 4.17.5.1 of the EIR. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.



I135-96 cont.

construct new lines connecting to existing lines in Magnolia Avenue, which would convey water from the existing Magnolia Summit Tank (Magnolia Zone) at the terminus of Princess Joann Road. Similarly, new transmission lines would be extended in Cuyamaca Street from the existing 880 Zone (Cuyamaca Tank and Magnolia Pump Station) at the terminus of Woodglen Vista Drive to the project site. Additionally, a redundant feed of 880 Zone water to the proposed project would be formed by connecting to the existing 629 Zone near the Carlton Hills Tank (Gravity Zone) and constructing a new 880 Zone pump station on the project site adjacent to the Santee Lakes Recreation Preserve to pump water through a proposed transmission line in Fanita Parkway to serve the proposed project.

The water system for the proposed project would be designed to provide a minimum 2,500 gallons per minute (gpm) for 2 hours of fire flow with fire hydrants spaced on average every 300 feet. The proposed 880 tank would be sized to serve the proposed project demands and fire storage equal to the deficit in the existing Magnolia Zone storage. The proposed project would provide 2,500 gpm fire flow for 4 hours at the proposed 880 Zone Tank and 3,500 gpm for 2 hours at the proposed 1230 Zone Tank. The total volume of the proposed 880 Zone Tank is 3.63 million gallons, and the total volume of the proposed 1230 Zone Tank is 2.59 million gallons. The proposed 880 Zone water supplies would feed the proposed on-site 880 Zone water tank that is planned south of Street "W" and east of Cuyamaca Street. Refer to Tables 4-2 and 4-3 in Appendix O1 for recommended tank and pump station sizing for the proposed project.

A new on-site 1230 Zone pump station would be constructed north of the proposed 880 Zone water tank at the eastern edge of the Farm along the northern side of proposed Street "W." This second pump station would convey water to an on-site 1230 Zone water tank in Vineyard Village with a capacity that serves the northeastern areas of the project site.

Approximately 21 single-family lots (Low Density Residential units) in the southeastern corner of Vineyard Village would receive adequate fire protection service from the 1230 Zone system and would also be equipped with private booster pumps to increase domestic service pressures. The private booster pumps installed at each of these residences would increase pressure in both the domestic plumbing that supplies the residential fixtures and the fire sprinkler system (Appendix O4).

Since PDMWD has existing 880 Zone water tanks (Cuyamaca Tank and Magnolia Pump Station and Magnolia Summit Tank) in the system, the new proposed 880 Zone water tank would consist of a single storage reservoir. The proposed 880 Zone pump station, to be north of the existing 629 Carlton Hills Tank, would be sized to serve the entire project site as the primary supply. The 880 Zone pump station would not need to pump full fire flow because this need is already met elsewhere in the system. Therefore, the new 880 Zone pump station would serve the maximum day demand of the entire project plus fire flow recharge in the 880 Zone water tank over 3 days.

Since the 1230 Zone would be formed by constructing a new 1230 Zone water tank, this storage facility would require either two reservoirs at this site or a single reservoir with two storage bays ("tank in a tank" type design). The proposed 1230 Zone pump station would be sized to serve the 1230 Zone fire flow needs of 3,500 gpm. The pump station is anticipated to house three identical pumps, each with a design point near 1,750 gpm. The proposed 880 Zone and 1230 Zone water tank reservoirs would be sized to accommodate the operational and fire flow storage needs for their respective service areas.

In addition, new buildings would be designed with the latest water-efficient plumbing systems, fixtures, and faucets. Native and drought-tolerant landscaping would reduce the demand for irrigation water. Turf would be limited to active play areas. Irrigation systems would use smart controllers to automatically adjust the amount and frequency of water based on current weather and soil conditions. Mulching, hydrozoning, and other water-conserving planting and maintenance techniques would be implemented in common areas and park landscaping. These techniques and water-wise educational information would be discussed as part of a community education program at the Farm or elsewhere in Fanita Commons.

The proposed project would be constructed in four phases, as analyzed in the Water Service Study (refer to Figure 3-5, Potable Water System Phasing, in Appendix O1). The following includes a summary of demands by phase: ☐ Phase 1. Initial connection to the proposed project would be provided by an extension of both Fanita Parkway and Cuyamaca Street. Phase 1 includes the development of Fanita Commons and the eastern portion of Orchard Village, which includes some Village Center areas, the Active Adult land use, a fire station, agriculture, and several park areas. The connection to the Gravity Zone includes the proposed 880 Zone pump station and associated piping that would take suction from the existing Gravity Zone at the 629 Carlton Hills Tank. Phase 1 would also require the construction of the new 880 Zone Tank, which would be served entirely from the Gravity Zone through the proposed 880 Zone pump station. The connection in Cuyamaca Street at Chaparral Drive to the existing 16-inch pipeline in the Magnolia Zone would be completed during Phase 1. ☐ Phase 2. The second phase would construct the western portion of Orchard Village, which

1135-96 cont. includes single- and multi-family residential uses and Village Center areas. Phase 2 would be served by making internal connections to Phase 1 infrastructure. Phase 3. The third phase includes the construction of the southerly half of Vineyard Village. This area would include predominantly single and multi-family residential uses with several internal parks and agriculture. Due to the elevation change within Phase 3, a new 1230 Zone tank would be required, along with a new 1230 Zone pump station. The 1230 Zone pump station would be on the western side of proposed Street "W," as shown on Figure 3-11. Phase 3 would connect to the Phase 2 water system near the intersection of Street "A" and Cuyamaca Street. Phase 3 would be served entirely by the 1230 Zone. Phase 4. The final phase would build out the remainder of the proposed project north, which includes single- and multi-family residential uses, parks, some Village Center areas, and agriculture. This phase would connect to the Phase 3 water system; no additional off-site facilities would be required to serve Phase 4. Phase 4 would be served entirely by the 1230 Zone. A hydraulic analysis was conducted (Appendix O1) to assess the proposed water system's ability to supply peak-hour demands and maximum day demands plus fire flow conditions based on Water Agency Standard (WAS) design criteria, which is shown in Table 4.17-1.

1135-97 So much of the above is due to the fact that instead of brush and grasses on the hillside, we will have up to 3008 homes, businesses, various facilities and the vineyard that need to be protected from fire. Brush can grow back after a fire, as demonstrated in the 2003 fires, but homes are not so easy to rebuild. A bad idea to build more homes on hillsides. I hope we don't have to use our water supply to fight fires that threaten homes that will be more susceptible because they are built on hillsides. During the 2003 fires, we only had to worry about brush and grasses on our hillsides. This was not as much of a threat as fires are to people and their homes.

1135-98 Housing: As shown in Table 4.13-3, by 2035 the City is expected to have a total of 22,776 households, or approximately 1.6 percent of the regional total, which represents a decrease from 1.7 percent of the regional total in 2012. The City has experienced a population growth trend since 2012 (Table 4.134) and is forecasted to continue to increase its population steadily through 2035 (Table 4.13-3). The anticipated decrease in the City's regional total of housing over the same time period indicates that residential construction in the City is not anticipated to keep pace with population growth. The only way population in Santee can increase is if more houses are built. So to say the population is expected to grow to (name a figure), that will only happen if there are abodes for people to move into. There is no need to CROWD the city of Santee by building large developments such as the planned FR. Perhaps people can move to east County where there is plenty of space in the County, rather than ruining life for those of us who already live here by making it so crowded that it becomes an unpleasant place to live. What this really boils down to (as usual), is money. The city wants money it its coffers. Ironically, a large part of why they will need the money is to pay for road maintenance and repair, sewage, fire and law enforcement services, etc. Of course, if there is a housing shortage, it is possible that families will choose to live together in one household, but that usually happens during hard economic times. Anyone who moves to FR will need money to pay for the large mortgages.

**I135-97:** This comment questions why a looped water system is required and whether it is because of the proposed project's location. The looped system is required by the water purveyor for all areas and is not based on the proposed project's location. Looped systems are preferred because they provide a high degree of reliability should a line break occur. The break can be isolated with little impact on fire operations and consumers. This comment requests information and raises no new issues not already addressed in the EIR. Therefore, no further response is required.

**I135-98:** This comment states generalizations about population growth and the monetary costs and benefits to the City for development projects. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I136: Joseph Contreras, July 13, 2020

**I136**

**I136-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Joseph Contreras <contreras.joseph@att.net>  
**Sent:** Monday, July 13, 2020 2:35 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

My wife, son and I have lived in Santee for over 20 years. We moved out here for the schools for our son, purchasing first a condo and, 4 years later, a home. We are both small business owners, my wife in Santee, and my office is in San Diego, which requires me to commute on I-52 (dealing with traffic congestion that Santee residents have to deal with on a daily basis). We want to continue living here, to enjoy the numerous trails and parks. Driving to work and these destinations is still necessary however, and with all the infill projects taking place, getting to them has become more difficult and, once there, parking has become a nightmare; our dream of remaining here has been on the verge of fading. We believe Fanita Ranch offers us a way back to those dreams. We have looked carefully at the plans, listened to endless discussions and debates and have reached the conclusion that Fanita Ranch will provide us with the retirement environment we dreamed of. The farm Fanita Ranch offers is stimulating and educational for young and old alike, returning the lost charm that brought us here in the first place, and will restore the rural country appeal on which Santee was founded. We believe the plans offer a way to mitigate the traffic problems that now exist, we believe our dreams can still be realized, we believe Fanita Ranch is the way forward.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report.

While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I136-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report.

While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

1136-  
1  
cont. The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Joseph Contreras  
9475 Wharton Rd  
Santee, CA 92071  
contreras.joseph@att.net



## Comment Letter I137: Robin Davis, July 13, 2020

**I137**

**I137-1:** This comment states that the environmental concerns, including traffic and public safety, would not be mitigated adequately. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**From:** Robin Davis <jrbd66@gmail.com>  
**Sent:** Monday, July 13, 2020 4:05 PM  
**To:** Chris Jacobs  
**Cc:** eidcpa@aol.com  
**Subject:** Fajita Ranch

To whom it may concern:

I137-1  
 1 I'm a 20 year resident of Santee, and am very strongly opposed to the Fanita Ranch development. There are environmental concerns, traffic concerns, and public safety concerns that this project envelops, that would not be mitigated adequately by any proposals so far. This would be an egregious over-build of a beautiful natural open space in our city, that we need to preserve for future generations to enjoy.

There are numerous documented locations of artifacts in the Fanita Ranch area that the Kumeyaay tribe of Native Americans used for hunting and gathering that need our protection. This is an optimal teaching environment for young people, interested in learning about our beginnings as a society. Wild life abounds in this area as well, some species very fragile and also in need of human protection, not destruction.

I137-2  
 2 Traffic in and out of Santee has progressively worsened over the past several years as building has out-paced our surface streets and Hwy 52 on-ramps during commute times. Traffic patterns have been documented by CALTRANS, in a 2016 study, that rated the on-ramp at Mast as LOS E, worst rating they use, meaning that the area is already at an 80% or higher level of capacity. This level was given prior to a 386 unit project, Weston, nearing completion now in 2020. Fanita Ranch would increase cars on this ramp/highway, which causes a domino effect backing up all feeder roads nearby, namely Mast Blvd., West Hills Parkway, and Carlton Oaks Drive. Our residents are already dealing with a great deal of stress due to the increased traffic, not to mention the risk to public safety this traffic congestion creates. We've taken our concerns to our city council on numerous occasions to no avail. So we are very reluctant as a community of allowing any more development projects until some mitigation on roadways occur.

I137-3  
 3 Our city founders carefully crafted a General Plan for future generations of leaders to follow. Fanita Ranch ignores carefully planned growth plans and should not be approved to go forward. Protecting our open space, with all of its wonderful history and wildlife needs to be our priority.

Thank you,  
 Robin Davis

Sent from my iPad

services, including fire and police protection. These issues are adequately addressed in the EIR.

This comment also states that there are documented locations of Kumeyaay tribe of Native Americans artifacts on the project site. Section 4.4, Cultural and Tribal Cultural Resources, analyzes potential for impacts to cultural and tribal cultural resources on the project site due to implementation of the proposed project and recommends mitigation measures to reduce or avoid adverse impacts. The information in Section 4.4 is based on the following: Cultural Resources Phase I Survey Report prepared by Atkins (2017) (Confidential Appendix E1); Phase II Cultural Resources Testing and Evaluation Report prepared by Rincon Consultants, Inc. (Rincon) (2020) (Confidential Appendix E2); Tribal Cultural Resources Consultation Efforts for the Fanita Ranch Project Memorandum prepared by Rincon (2020) (Confidential Appendix E3); and Fanita Ranch Development Project Phase I In-Fill Pedestrian Surveys prepared by Rincon (2020) (Confidential Appendix E4). Confidential Appendices E1 through E4 are bound under a separate cover because they contain sensitive information regarding the location and components of cultural resources and tribal cultural resources and, pursuant to state and federal law, are not made available to the general public. In addition, tribal consultation pursuant to Assembly Bill 52 has occurred with one tribe who

requested formal notification, the Barona Band of Mission Indians. The EIR concludes that the proposed project would result in a less than significant impact on cultural and tribal cultural resources with mitigation incorporated. This issue is adequately addressed in the EIR.

- I137-2:** This comment states that the proposed project would increase traffic in an already highly impacted area. Please refer to response to comment I137-1, which addresses the same transportation issue raised in this comment.
- I137-3:** This comment states that the proposed project ignores carefully planned growth plans, including the Santee General Plan, and should not be approved to go forward. The Santee General Plan identifies the project site as Planned Development; therefore, it is not ignoring planned growth plans. In addition, this comment states that protecting open space and wildlife should be the priority. The proposed project would protect open space by preserving 1650.4 acres, or approximately 63 percent, of the project site in perpetuity as a managed and maintained Habitat Preserve.

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## Comment Letter I138: Sherry Duhamel, July 13, 2020

**I138**

**I138-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Sherry Duhamel <sherry.duhamel@gmail.com>  
**Sent:** Monday, July 13, 2020 8:11 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I138-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Sherry Duhamel  
8502 Organdy Ln  
Santee, CA 92071  
sherry.duhamel@gmail.com

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## Comment Letter I139: Karen Fleck, July 13, 2020

**I139**

**I139-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Karen Fleck <fleck.karen2@gmail.com>  
**Sent:** Monday, July 13, 2020 1:21 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I have been to informational meetings, read the opinions on both sides, and want you to know that my husband and I are IN FAVOR of this development and the way it is being proposed. Excited for this to be in Santee as an option for housing, and believe their efforts to be a good neighbor and address traffic and other concerns are fair. I encourage the council to support Fanita Ranch.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I139-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Karen Fleck  
10751 Strathmore Dr  
Santee, CA 92071  
fleck.karen2@gmail.com

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## Comment Letter I140: Gloria and Ronald Gerak, July 13, 2020

I140

**I140-1:** This comment states that the citizens of the City of Santee voted down a scaled down version of the proposed project in 1999 due to the General Plan Amendment. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project’s potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project’s consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project’s consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee

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**From:** Gloria Gerak <gvgerak@cox.net>  
**Sent:** Monday, July 13, 2020 9:01 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft Eir

I140-1  
1  
In 1999 the Citizens of Santee successfully voted down a scaled down version of this project. The problems were, General Plan Amendments in order to increase the footprint and density. Problems with fire and traffic. 20 years later nothing has changed. The Citizens of Santee are still opposed to all those same thing, however now this developer wants to increase the density. Fire is a major concern. Twice and a 3 year span, my family and I had to pack up our belongs and be ready to go. Once we were trapped here as fire came all the way down to Medina where Weston sits now.

We are against Fanita Ranch because we can't possibly feel safe with these additional homes built in our lovely open spaces. Please keep the development to the valley floor where it belongs.

Thanks and Be Well,  
Gloria and Ronald Gerak

9605 St. Andrews Drive  
Santee, CA 92071  
619.562.6622 Office & Fax  
Mobile 619.300.6623



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General Plan as amended. This issue is adequately addressed in the EIR.

This comment also states that fire is a major concern for the proposed project. Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire. This issue is adequately addressed in the EIR.

This comment further states traffic is a concern for the proposed project. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR

analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

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## Comment Letter I141: Gloria and Ronald Gerak, July 13, 2020

**I141**

**I141-1:** This comment states concerns about the water situation regarding the proposed project. Section 4.17.5.2, Threshold 2: Water Supply Availability, in EIR Section 4.17, Utilities and Service Systems, evaluates the proposed project’s impact on water supply availability. The EIR concludes that the proposed project would increase the demand on water supply from the Padre Dam Municipal Water District (PDMWD); however, sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. This issue is adequately addressed in the EIR.

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**From:** Gloria Gerak <gvgerak@cox.net>  
**Sent:** Monday, July 13, 2020 4:48 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

We have a question(s)/concern(s) about the water situation. We know that the water will be coming from PDMWD. We understand that the water for that Fanita Ranch will rely on will be Toilet-to-Tap. Any time we have asked about water from PDMWD they have been evasive.

I141-1: Has the Toilet-to-Tap been confirmed?

Is it a done deal?

If this does not happen, where will the water come from?

How will it effect the Santee Ratepayers?

Thanks and Be Well,

Gloria and Ronald Gerak

9605 St. Andrews Drive  
Santee, CA 92071  
619.562.6622 Office & Fax  
Mobile 619.300.6623



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water supply security to the proposed project and other PDMWD customers if it is implemented.

This comment also asks how the water supply to the proposed project would affect the City of Santee ratepayers. Water rates are set by the water service provider, PDMWD, and not the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I142: Trevor Ginn, July 13, 2020

I142

**I142-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Trevor Ginn <user@votervoice.net>  
**Sent:** Monday, July 13, 2020 10:13 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I have grown tired of apartment living and have saved up enough for a down payment. Everywhere I look, the only homes for sale in San Diego are old beat up houses with serious issues, or new homes packed so close together that it may as well be an apartment. My last hope before moving states is Fanita Ranch, it sounds like it will be a wonderful place to live and, if the promises are kept, will finally be the one place that will make me excited instead of worried to buy a home.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I142-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Trevor Ginn  
10445 Mast Blvd  
Santee, CA 92071  
ginntrevor@yahoo.com

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## Comment Letter I143: Cody Haizlip, July 13, 2020

**I143**

**I143-1:** This comment states the commenter’s opinion that that biggest problem with the proposed project is compliance with the Santee General Plan, suggesting it is out of date and needs to be updated. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project’s potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project’s consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project’s consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project

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**From:** Cody Haizlip <codyhaiz@gmail.com>  
**Sent:** Monday, July 13, 2020 4:21 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

Mr. Jacobs,

A project as large as the Fanita Ranch proposal will significantly affect the growth and development of Santee for generations. With this in mind, I can see no larger issue with the EIR than that of the General Plan. Any developmental project larger than a few homes or a single business should be on hold pending compliance with an updated General Plan.

As I am sure you are aware, the General Plan was last updated on August, 2003 and is nearly identical to the previous version from 1984. Before we approve a milestone project such as Fanita Ranch, we must ensure it is aligned with the vision and goals of our city's future. It is impossible to make that determination without an up-to-date General Plan. A Specific Plan is nothing more than a developer generated proposal to build something not in-line with the General Plan. The city council's failure to address this, and delay the process is unacceptable. Allowing Fanita Ranch to move forward with their Specific Plan, is basically giving HomeFed control of our next General Plan's vision and goals. This is not the way to build a resilient and well-planned city.

Our city has an abundance of Single-Family homes, while over 49% of the residents are single or elderly and do not need a family home. Neither of those demographics need/want to maintain a detached single-family home. They are also more likely to need housing assistance or fall into the low-income brackets. What they need is easy and convenient pedestrian access to commerce, public transportation, and health care. Low-income housing relies on high-density projects. Our Town-Center is an ideal location to build the type of housing stock Santee needs to balance its housing stock. Building mixed-use, mid-to-high density midrise projects in the Town Center, or along the San Diego River would be a smart way to grow the city.

I143-1 Santee is at a crossroads with an opportunity to correct the imbalance of Suburban Sprawl. How can we continuously live in a community with changing live needs? The city still has the potential to become a regional model; a self-sustainable balanced city. The 2008 recession that halted the previous Fanita Ranch project was most likely a blessing, we can learn from the mistakes of other cities and instead grow with a long-term strategy in mind. Housing should be viewed as a cycle, as we no longer live in the same house our entire lives. As we progress through our life stages, our housing needs change. The problem with Santee is there are only two housing choices. Single-family residential or mobile home parks. We need to fill in the missing pieces, Fanita Ranch is moving in the opposite direction of what our city needs; Fanita Ranch is trying to repackaging the concept of Suburban Sprawl by adding some aesthetical design and claiming the incorporation of agriculture (only 1.4% of the development) and commercial (only 0.06% of the development) use.

Our "Town Center" only has 400 residential units, lacks mix-used development, and has large county parcels up for sale. We are about to squander a great opportunity. Why would we not focus our development efforts in the Town Center and along the San Diego River. I wish I had more time to address individual items in the EIR, but the comment deadline is closing, and I had family emergencies that prevented my attention for the past couple of months. I did read it and can say that there are some very questionable assessments made by Homefed. We can do better, I am not anti-development, but the Fanita Ranch proposal is not the right fit for what Santee is lacking, it takes us in the wrong direction. Any references to the General Plan in the EIR is a moot point, as everyone knows it is outdated and awaiting revision; it is impossible to determine the project's compliance with the cities future goals.

Thank You,  
Cody Haizlip, M.Arch  
9709 Jeremy St.  
Santee, Ca 92071  
619-507-5560

would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR.

The comment also mentions the various household demographics in the City, including those that are single and elderly, and seeks a balance of housing types, not just single family homes. The Fanita Ranch Specific Plan provides for an assortment of housing types at various density ranges, such as single-family detached homes, attached homes, and senior-restricted housing. Chapter 3, Project Description, specifically Table 3-1, Preferred Land Use Plan Project Component Summary, details the variety of housing types that would occur in the proposed project. The proposed project would include 866 Medium Density Residential units, 1,203 Low Density Residential units, 445 Active Adult Residential units, and 435 residential units within the Village Center land use.

The comment also mentions the need for low-income housing. As stated in Section 4.13.2.2, the Santee General Plan Housing Element identifies the project site for above moderate housing. At 2,949 units, or 3,008 units without the school, the proposed project would meet and exceed the City's assigned allocation of 1,410 above-moderate units identified in the adopted Housing Element Site Inventory.

## Comment Letter I144: Lesley Handa, July 13, 2020

**I144**

**I144-1:** The comment provides background information on bird species in North America, stating that populations have declined since the 1970s, and that two-thirds of species are vulnerable to changes due to climate change. The comment continues that San Diego has the highest bird biodiversity in the United States. The comment requests that the EIR analyze impacts to bird species identified as “Federal Endangered Species, State Endangered Species, USFWS Birds of Conservation Concern, and on the California Watch List.” The comment expresses the commenter’s opinion that Section 4.3, Biological Resources, does not adequately address the impacts of the proposed project on these species to the local population in San Diego County.

Section 4.5.3 of the Biological Resources Technical Report (Appendix N) describes the potential to occur for state and federally listed species, California species of special concern, fully protected species, USFWS birds of conservation concern, California watch list species, and other categories. More sensitive species are analyzed with more specificity and suites of species are together within Sections 5.1.3, 5.2.3, and 5.3 of the Biological Resources Technical Report. Therefore, the EIR does analyze the categories of bird species identified by the commenter.

Chris Jacobs, Principal Planner  
 Subject: Fanita Revised Draft EIR  
 Department of Development Services  
 City Hall, Building 4  
 10601 Magnolia Avenue  
 Santee, California 92071

July 13, 2020

To Whom It May Concern:

- I144-1

This letter is in response to the Fanita Revised Draft EIR. According to a study from 2019, nearly 3 billion bird species across North America have declined with an overall decline of 29% since the 1970s (Rosenberg et al. 2019) and two-thirds of bird species in the United States are vulnerable to changes from Climate Change in the future and are at risk of extinction, according to the Survival By Degrees Report by Audubon. As this proposed Fanita Ranch project will take place in San Diego County which boasts the highest bird biodiversity in the United States with 524 species of birds as of 2020, we request that you specifically address the impact of this project on the following individual bird species sighted in Section 4.3 Biological resource that are of conservation concern designated as Federal Endangered Species, State Endangered Species, USFWS Birds of Conservation Concern, and on the California Watch List. We do not believe that the proposed project adequately addresses the impact on these individual species to the local population in San Diego County and the large population. Additionally, impacts from climate change are not addressed for each of these species and we request further information regarding impacts to the bird species and the habitat up to the year 2100.
- I144-2

As Fanita Ranch is considered aridlands, 44% of all bird species will have medium to high vulnerability to climate change (NABCI 2010). Habitat will undergo major changes due to climate change and habitat quality is expected to degrade as there is a predicted increase in drier, warmer, and more variable habitat with Climate Change (NABCI 2010). As aridlands are highly susceptible to non-native invasive species with Climate Change (NABCI 2010), loss in any existing habitat would be detrimental to the current species using this area, especially sensitive species that are conservation concern, including the Federally Threatened California Gnatcatcher which is also a California Species of Special Concern; the Coastal Cactus Wren, a Bird of Conservation Concern and California Species of Special Concern; the Oak Titmouse, a Bird Species of Conservation Concern; Brewer’s Sparrow a USFWS Bird of Conservation Concern. If this project moves forward, how will losses be mitigated for the local population of this species in San Diego County? How will losses be mitigated for the statewide population of this species? How will losses be mitigated from the impact of climate change? Please provide full detail addressing the question for each of these species and please provide insight using several climate scenarios projected into the future up until the year 2100.
- I144-3

According to the San Diego Bird Atlas, the conservation outlook for the Grasshopper Sparrow, a California Species of Special Concern, in San Diego County is dim (Unitt 2004). As this species was surveyed in the area proposed for development, how will the destruction of current habitat be mitigated for this species? How will the destruction of this habitat affect local populations in San Diego? How will it affect the larger statewide population? How will the potential loss of habitat due to Climate
- I144-4

According to the San Diego Bird Atlas, the conservation outlook for the Grasshopper Sparrow, a California Species of Special Concern, in San Diego County is dim (Unitt 2004). As this species was surveyed in the area proposed for development, how will the destruction of current habitat be mitigated for this species? How will the destruction of this habitat affect local populations in San Diego? How will it affect the larger statewide population? How will the potential loss of habitat due to Climate
- I144-5

According to the San Diego Bird Atlas, the conservation outlook for the Grasshopper Sparrow, a California Species of Special Concern, in San Diego County is dim (Unitt 2004). As this species was surveyed in the area proposed for development, how will the destruction of current habitat be mitigated for this species? How will the destruction of this habitat affect local populations in San Diego? How will it affect the larger statewide population? How will the potential loss of habitat due to Climate

The comment does not provide any explanation of or support for the commenter's opinion that the EIR does not adequately address the impacts of the proposed project on these species. Therefore, no further response can be made. Nonetheless, the City disagrees with this comment. Based on the opinion of the biological experts who prepared the analysis, the EIR adequately assessing the biological impacts of the proposed project to applicable sensitive bird species.

- I144-2:** The comment states that impacts to bird species due to climate change are not addressed and requests further information regarding impacts to the bird species and the habitat up to the year 2100. Climate change impacts are analyzed in Section 4.7, Greenhouse Gas Emissions. As analyzed in Section 4.7.5, Project Impacts and Mitigation Measures, the proposed project would result in potentially significant impacts to greenhouse gas emissions, and mitigation measures are recommended to reduce impacts as required by CEQA. With implementation of the mitigation measures recommended in Section 4.7.5, the EIR determined that “per capita emissions from the preferred land use plan with school would be 1.50 MT CO<sub>2e</sub> . . . , and per capita emissions from the land use plan without school would be 1.61 MT CO<sub>2e</sub>.” These levels are below the 1.77 MT CO<sub>2e</sub> threshold for either land use plan; therefore, impacts to GHG emissions were found to be mitigated to a less

than significant level. The comment also questions how climate change would impact these species through 2100. Section 4.7.6, Cumulative Impacts and Mitigation Measures, further determined that the proposed project's contribution to cumulative impacts to GHG emissions were also less than significant. Because the proposed project would not have a significant effect on GHG emissions, impacts to biological resources as a result of implementation of the proposed project are less than significant. Further, impacts resulting on bird species from existing and future climate change, with or without the proposed project, are not subject to CEQA as these are existing conditions, which are not an effect of the proposed project and, therefore, not analyzed nor required to be disclosed in the EIR.

- I144-3:** The comment states that “44% of all bird species will have medium to high vulnerability to climate change (NABCI 2010),” and that “aridlands” habitat will change due to climate change. The comment claims that “habitat quality is expected to degrade as there is a predicted increase in drier, warmer, and more variable habitat with Climate Change (NABCI 2010).” Please refer to response to comment I144-2 regarding the proposed project's impact to greenhouse gas emissions, which is determined to be less than significant both at the project and cumulative level.

- I144-4:** The comment states that impacts to “aridlands” are susceptible to non-native invasive species due to climate change and that any loss in any existing “aridlands” habitat could be detrimental to the species using such areas, including coastal California Gnatcatcher, coastal cactus wren, oak titmouse, Brewer’s sparrow. The question asks how impacts to the local and statewide populations would be mitigated if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2 regarding the proposed project’s impact to greenhouse gas emissions, which is determined to be reduced to a less than significant level with mitigation, both at the project level and cumulative level.
- I144-5:** The comment refers to the grasshopper sparrow. The question asks how impacts to the local and statewide populations would be mitigated if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Note that this species has experienced changing amounts of suitable habitat over the course of study on the site. Shortly after the 2003 Cedar Fire, abundant grassland habitat was present on site. As vegetation recovered, many areas returned to a sage scrub state that was no longer suitable for grasshopper

- I144-5 cont. Change be mitigated for this species? Please address these questions in full detail for this species and please provide insight using several climate scenarios projected into the future up until the year 2100.
- I144-6 According to the San Diego Bird Atlas, the Southern California Rufous Crowned Sparrow, a species on the California Watch List and the Bell's Sage Sparrow, a USFWS Bird of Conservation Concern and a species on the California Watch List are both subject to habitat fragmentation in San Diego County (Unitt 2004). If the Fanita Ranch project moves forward, how will you mitigate local impacts on the population in San Diego County? How will losses to the statewide population be mitigated? In regards to potential loss of habitat due to Climate Change, how will this be mitigated for these two species? Please address the questions in full detail for both of these species and please provide insight using several climate scenarios projected into the future up until the year 2100.
- I144-7 Raptors require large amounts of space to forage and have territories. If the project moves forward, this will displace the raptors that are currently using this area including the Cooper's Hawk, a species on the California Watch List; the Long-eared Owl, a California Species of Special Concern; Northern Harrier, a California Species of Special Concern; Merlin, a species on the California Watch List; American Peregrine Falcon, a USFWS Bird of Conservation Concern and a California Fully Protected Species; White-tailed Kite, a California Fully Protected Species. If Fanita Ranch moves forward, how will the destruction of current territories and displacement of these birds be mitigated? How will these losses affect the local population in San Diego County? How will these losses affect the statewide population? How will you mitigate the potential loss of habitat due to climate change? Please provide answers in full detail that address each raptor species listed above and please provide insight using several climate scenarios projected into the future up until the year 2100.
- I144-8 The Golden Eagle, a USFWS Bird of Conservation Concern, is species that is California Fully Protected Species, and on the California Watch List. Research has shown that even the slightest disturbance from human activity negatively affects the species (Pauli et al. 2017). If the project moves forward, how will human activity that may negatively affect the presence of Golden Eagles be mitigated? If the project moves the Golden Eagles out of the area, what are the impacts on the local population of this species? What will the impact be on the Statewide population of this species? How will impacts from Climate Change be mitigated for this species if this project moves forward? Please provide insight using several climate scenarios projected into the future up until the year 2100.
- I144-9 Historic widespread destruction of riparian areas have already negatively affected the following birds in San Diego County including the Yellow Warbler, a USFWS Bird of Conservation Concern and California Species of Special Concern; Yellow-breasted Chat, a California Species of Special Concern; Least Bell's Vireo, a Federally and State Endangered species; and Willow Flycatcher, a USFWS Bird of Conservation Concern and is State Endangered. How will this project mitigate losses and destruction of habitat and disturbance to these species? What will the impacts on the local population be for all of these species be if the habitat is disturbed or destroyed? What will the impact on the state population be for all these species if the habitat is disturbed or destroyed? If this project moves forward, how will losses be mitigated considering potential future impacts to the habitat from Climate Change for all of these species? Please provide full detail for all of the questions individually addressing each of the species listed above and provide insight using several climate scenarios projected into the future up until the year 2100.

sparrow. Over time, there are noted overlapping grasshopper sparrow and coastal California gnatcatcher point data locations. Further, impacts to grasshopper sparrow are analyzed in Section 4.3, Biological Resources, of the EIR. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, impacts to grasshopper sparrow would be reduced to less than significant through on-site preservation as outlined in Mitigation Measure BIO-1, “which would provide 272.71 acres of suitable nesting and foraging habitat in a configuration that preserves genetic exchange and species viability,” as well as Mitigation Measure BIO-14, which requires preconstruction nesting bird surveys in suitable habitat.

**I144-6:** The comment refers to the Southern California rufous-crowned sparrow. The question asks how impacts to the local and statewide populations would be mitigated if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Further, impacts to Southern California rufous-crowned sparrow are analyzed in Section 4.3 of the EIR. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, impacts to Southern California rufous-crowned sparrow would be reduced to less than significant through on-site preservation as outlined in Mitigation

Measure BIO-1, “which would provide 1,263.65 acres of suitable nesting and foraging habitat in a configuration that preserves genetic exchange and species viability,” as well as Mitigation Measure BIO-14, which requires preconstruction nesting bird surveys in suitable habitat.

**I144-7:** The comment states that raptors require large amounts of space to forage and have territories. The comment states the proposed project would displace raptors currently using the project site, including the Cooper’s hawk, long-eared owl, northern harrier, merlin, American peregrine, and white-tailed kite. The question asks how impacts to the local and statewide populations would be mitigated if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Additionally, the western woodlands will be well buffered from adjacent development and adjoin open spaces to the east and north. While Cooper’s hawk is a species that is doing better near urban environments due to foraging opportunities (Boal and Mannan 1999; Millsap 2018), the woodlands will provide suitable and buffered habitat. Likewise, for long-eared owl, white-tailed kite, and other raptors, the buffered woodland area will provide suitable habitat. Northern harrier are unlikely to nest on site due to poor habitat but would be



expected to forage throughout the open space. Merlin and peregrine falcon would not nest on site but are expected to still be able to forage. Further, impacts to raptors and foraging habitat are analyzed in Section 4.3 and Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species. As described therein, impacts to raptors and foraging habitat are reduced to less than significant with implementation of the recommended mitigation measures.

- I144-8:** This comment refers to golden eagle. The comment states that human activity may negatively affect the species and questions how impacts to the local and statewide populations would be mitigated if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Further, impacts to golden eagle are analyzed in EIR Section 4.3, Biological Resources. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, the project site does not contain suitable nesting habitat for golden eagle, and the site is unoccupied by golden eagles; however, suitable foraging habitat does occur on the project site. Nonetheless, the proposed project's on-site Habitat Preserve, outlined in Mitigation Measure BIO-1, "would provide 442.46 acres of potential suitable foraging habitat that would reduce potential impacts to this species to less than significant."

**I144-9:** The comment states that historic destruction of riparian areas have negatively affected several bird species including yellow warbler, yellow-breasted chat, least Bell's vireo, and southwestern willow flycatcher. The comment asks how the proposed project would mitigate losses and impacts to habitat and disturbance to these species. The comment asks how the proposed project would impact the local and statewide populations if the proposed project is developed. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Further, impacts to riparian bird species and habitat are analyzed in Section 4.3 and Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species. As described therein, impacts to riparian bird species and habitat are reduced to less than significant with implementation of the recommended mitigation measures.

I144-10 According to the American Bird Conservancy, the Rufous Hummingbird, a USFWS Bird of Conservation Concern is declining, due to the replacement of native plants by ornamental plants in urban areas (Unitt 2004). If Fanita Ranch moves forward, how will losses and destruction of habitat be mitigated for this species? If the habitat is destroyed, what will the impacts be to local and state populations for the Rufous Hummingbird? How will losses be mitigated considering potential future impacts on habitat and this species from Climate Change? Please provide insight using several climate scenarios projected into the future up until the year 2100 for the Rufous Hummingbird.

I144-11 The Loggerhead Shrike, a USFWS Bird of Conservation Concern and a California Species of Special Concern and is declining in San Diego County and is sensitive to habitat fragmentation (Unitt 2004). How will habitat loss and disturbance of habitat be mitigated for this species? How will loss of habitat affect local populations of Loggerhead Shrike to San Diego County? How will this loss of habitat affect statewide populations of this species? How will these losses be mitigated considering potential future impacts to the habitat from Climate Change? Please provide insight into the impact on this species using several climate scenarios projected into the future up until the year 2100.

I144-12 The Horned Lark, a species on the California Watch List is sensitive to habitat fragmentation in San Diego County (Unitt 2004). If the project moves forward, how will disturbance and loss of habitat be mitigated for this species? How will these losses of this species affect the local population in San Diego County? How will losses of this species affect the statewide population of this species? How will these losses be mitigated considering the potential future impacts to the habitat from Climate Change for this species? Please provide insight using several climate scenarios projected into the future up until the year 2100.

I144-13 Thank you for the opportunity to comment on the DEIR and for your time and consideration. Please notify me of any updates to this project as I can be reached at [HandaornithologyLab@gmail.com](mailto:HandaornithologyLab@gmail.com).

Sincerely,



Lesley Handa  
Handa Ornithology Lab

REFERENCES

- North American Bird Conservation Initiative US Committee, 2010. The state of the birds 2010 report on climate change, United States of America. *Washington, DC: US Department of the Interior.*
- Pauli, B.P., Spaul, R.J. and Heath, J.A., 2017. Forecasting disturbance effects on wildlife: tolerance does not mitigate effects of increased recreation on wildlands. *Animal Conservation*, 20(3), pp.251-260.
- Rosenberg, K.V., Dokter, A.M., Blancher, P.J., Sauer, J.R., Smith, A.C., Smith, P.A., Stanton, J.C., Panjabi, A., Helt, L., Parr, M. and Marra, P.P., 2019. Decline of the North American avifauna. *Science*, 366(6461), pp.120-124.
- Unitt, P., 2004. San Diego County Bird Atlas. San Diego, CA: San Diego Natural History Museum.

I144-14

**I144-10:** The comment states the rufous hummingbird is declining due to the replacement of native plants by ornament plans in urban areas. The comment questions how the disturbance and loss of habitat be mitigated for this species if the proposed project is developed and such losses will affect the local and statewide population. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Further, impacts to rufous hummingbird are analyzed in EIR Section 4.3, Biological Resources. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, impacts to rufous hummingbird would be reduced to less than significant through on-site preservation as outlined in Mitigation Measure BIO-1, “which would provide 1,047.68 acres of suitable nesting and foraging habitat in a configuration that preserves genetic exchange and species viability.”

**I144-11:** The comment states that the loggerhead shrike is declining in San Diego County and is sensitive to habitat fragmentation. The comment questions how the disturbance and loss of habitat be mitigated for this species if the proposed project is developed and such losses will affect the local and statewide population. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2.

Further, impacts to loggerhead shrike are analyzed in EIR Section 4.3, Biological Resources. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, impacts to loggerhead shrike would be reduced to less than significant through on-site preservation as outlined in Mitigation Measure BIO-1, “which would provide 1,480.78 acres of suitable nesting and foraging habitat in a configuration that preserves genetic exchange and species viability,” as well as Mitigation Measure BIO-14, which requires preconstruction nesting bird surveys in suitable habitat.

**I144-12:** The comment states the horned lark is sensitive to habitat fragmentation. The comment questions how the disturbance and loss of habitat be mitigated for this species if the proposed project is developed and such losses will affect the local and statewide population. The comment also questions how climate change would impact these species through 2100 using several climate scenarios. Please refer to response to comment I144-2. Further, impacts to horned lark are analyzed in Section 4.3 of the EIR. As analyzed in Table 4.3-8a, Direct Impacts to Special-Status Wildlife Species, impacts to horned lark would be reduced to less than significant through on-site preservation as outlined in Mitigation Measure BIO-1, “which would provide 217.06 acres of suitable nesting and foraging habitat in a configuration that preserves genetic exchange and species viability.”

**I144-13:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I144-14:** This comment includes references provided by the commenter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

### References

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## Comment Letter I145: Kim Hart, July 13, 2020

**I145**

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**From:** antk333 <antk333@cox.net>  
**Sent:** Monday, July 13, 2020 10:54 AM  
**To:** Chris Jacobs  
**Subject:** No on Fanita Ranch

Sent from my Verizon, Samsung Galaxy smartphone

I145-1: In the event of fire how are the people going to get out safely? What will be the cost of fire insurance to residents if they can acquire. Huge traffic impact on the entire city of Santee. Neighborhoods in this area will have a large increase of traffic. 2 vehicles per home × 2,900 home = 5,800. Not to mention the environmental impact to the land, air quality, plants, and animals. Thank in advance. Kim Hart

**I145-1:** This comment asks how people will get out safely in the event of wildfire. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires and emergency evacuation that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety and emergency evacuation. This issue is adequately addressed in the EIR.

This comment also states that there will be huge traffic impacts on the entire City of Santee, as well as impacts to the land, air quality, plants, and animals.

Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a

program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.2, Air Quality, evaluates the potential for impacts to air quality due to implementation of the proposed project and recommends mitigation measures to reduce or avoid adverse impacts. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to air quality, although not to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, fully analyze potential impacts to sensitive plants, wildlife, and vegetation communities. The EIR concludes that impacts to sensitive plants, wildlife, and vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.



## Comment Letter I146: Paul Holloway, July 13, 2020

**I146**

**From:** Paul Holloway <Paul.Holloway@welkgroup.com>  
**Sent:** Monday, July 13, 2020 1:47 PM  
**To:** Chris Jacobs  
**Cc:** hogansierraclub@gmail.com; savefanita@gmail.com; Corinne Sylvestre  
**Subject:** Comments About Fanita Ranch Project - Tip of the Spear of Development

Hello Mr. Jacobs,

I146-1  
1 There are several issues regarding the Fanita Ranch development that I think needs further discussion with the public. Currently I don't think the current plan safeguards life, or the diversity of that life, adequately. The primary issue for us Santee residents is the issue of fire evacuation. Most of northern Santee is already surrounded by hills that in gale force winds could potentially overwhelm the existing fire stations. Even with the addition of another fire station within one of these new subdivisions, at the northern tip of the spear of East County development, will not be sufficient to stop an already out of control fire spreading from the top of the eastern ridge donned with potentially sparking powerlines in the middle of a bad Santa Ana at night and risking everyone's lives just like when Paradise was lost almost two years ago. So, the real question is: will everyone in Northern Santee be able to evacuate on time in the worst case scenario? I146-2  
2 We have to plan for the worst case scenario because over time the odds become very favorable for something like that happening. Just ask the residents of Paradise, or everyone in the world suffering with COVID-19. Just like pandemics happen every 100 years or so, so do totally out of control wildfires engulfing large swaths of San Diego County. We have an opportunity to save the lives of future and existing residents of Santee by not building beyond the line of potentially fire-setting powerlines that serve as the current effective northern boundary of East County development. Building almost 3000 new homes will require an entire small town to be evacuated onto one of two roads in this scenario. It is ultimately doomed to failure with people someday with everyone in Santee fighting the Fanita ranch people to evacuate and some families not quite making it due to all of the heat and smoke. I146-3  
3

I146-4  
4 Instead the issue of how to use the land should be put to rest for good by selling either to the state or the Nature Conservancy or other conservation organization just like what happened with the lands to the north of Crest that became the Crestridge Ecological Reserve, owned by the state but managed by the Endangered Habitats Conservancy. This would protect the biodiversity of an important type of land not even found in the hilly areas of Crestridge – the vernal pool. A vernal pool is an oasis for a variety of lifeforms in an otherwise parched landscape once the spring rains cease\*. These places need to be preserved and their existence could be enough reason for an organization like the Nature Conservancy to buy all of the land and keep people from off-roading over their delicate ecosystems. These are also prime way stations for monarch and other butterflies as they migrate from Mexico at the same time during the early spring. Having an these undeveloped oasis for them and the accompanying bird populations to rest is essential to keeping species from going extinct over the next few decades since they have been created with a high metabolism and need constant nourishment during their long migrations in areas that once were blanketed with wildflowers everywhere in the spring.

I146-5  
5 Furthermore, not only will the diversity of wildlife be impacted, but the development will only attract well-to-do residents and put a further strain on traffic throughout Santee regardless of how wide Mast or SR-52 becomes because. This is because everyone will be forced to use cars as they will be miles from the nearest bus stop. That is 3000 new cars on roads that during rush hour (when there is no pandemic) would still be clogged with the extra lane even without the additional 2000 or more cars commuting to SD every day. Let's create a more inclusive and traffic mitigated Santee. At the very minimum, and forgetting about the extreme fire danger, we would need a new bus line going into the new community from Cuyamaca street and a Bus Rapid Transit style bus traveling on SR-52 new express lanes from Santee Trolley Square to Kearny Mesa and Campus Point transit station where the new blue line extension is going to be.

**I146-1:** The comment expresses concern regarding wildfire ignitions, evacuation, and fire response and compares the area to Paradise (Northern California) and the Camp Fire. Please refer to Thematic Responses – Fire Protection and Safety, Fire Ignition and Risk, Evacuation, and Northern California Contrast for detailed discussions of the proposed project's fire protection system, research regarding ignitions and fire risk, how evacuations are planned and implemented, and how the referenced Camp Fire and Paradise evacuations are different than the proposed project area, respectively. The comment's concerns are not new issues and have been contemplated and adequately addressed in the EIR.

**I146-2:** The comment asks whether everyone in northern Santee will be able to evacuate on time under a worst-case scenario. Please refer to the Thematic Response – Evacuation regarding how evacuations are planned and implemented in the City of Santee and the County of San Diego. Evacuations are fluid events and specific to the wildfire, its location, and its behavior. There is no standard or threshold for acceptable evacuation times. Evacuation success can be based on the movement of people out of harm's way. Providing options for moving people out of harm's way becomes very important to the overall evacuation success. To that end, the proposed

project provides options: (1) Fanita Parkway; (2) Cuyamaca Street; (3) Magnolia Avenue; (4) connecting roads to each of these and major transportation corridors, SR-125, SR-52, SR-67, and I-8, within proximity; and (5) temporary on-site refuge as a contingency option should evacuation be considered less safe. In terms of evacuating on time, that depends on where the fire originates. If a wildfire is several hours away, evacuation of large areas can be accomplished. If a wildfire ignites very near the proposed project, evacuation may be a hybrid, where some project residents are relocated to other portions of the project or off-site and some existing residents in the wildland urban interface are evacuated. The comment does not raise a question that has not been contemplated and adequately addressed in the EIR.

- I146-3:** The comment suggests that a worst-case evacuation must be considered, compares the proposed project with Paradise’s evacuation during the Camp Fire, and provides the opinion that the proposed project’s evacuation will fail. The comment provides the opinion of the commenter but lacks supportive data to substantiate the claims. Please refer to Thematic Responses – Evacuation and Northern California Contrast for detailed discussion of how evacuations are planned and implemented and how the referenced Camp Fire and Paradise evacuations are different than the proposed project area, respectively. The evacuation planning process in the City of Santee and

County of San Diego is managed by law enforcement, fire, and emergency services. San Diego County emergency management agencies have a proven track record of successful, large evacuations since 2003 and have invested over \$500 million in predictive and alert notification technology along with response resources. San Diego County Sheriff's Department, which manages most evacuation events, has stated publicly on several occasions that it is confident it can move people out of areas at risk and has the record to back that statement up. The evacuation process follows a framework of key concepts and actions, but is purposely not planned in too great of details as each evacuation is a fluid event that requires adaptive management, nimble decision making, and situation awareness. One of the primary methods for successful evacuation is downstream intersection control. By controlling intersections in the direction traffic is being moved, evacuation managers can move the highest risk areas and quickly adjust to changing fire conditions. The ability of ignition resistant master planned communities like the proposed project to temporarily refuge residents on site, in their protected homes, or at designated buildings (school, Village Center) provides needed flexibility and optionality that is not available in older, more fire vulnerable communities. Therefore, the comment raises no new or unaddressed issues and is adequately addressed in the EIR.

**I146-4:** The comment suggests selling the project site to the Nature Conservancy or other conservation organization to protect the biodiversity of the vernal pool, monarch, and bird species.

This comment expresses a preference for the No Project/No Build Alternative but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

Nonetheless, Table 6-2, Summary of Impacts for Alternatives Compared to the Proposed Project, in Section 6.3, Environmentally Superior Alternative, in Chapter 6, Alternatives, summarizes all EIR alternatives compared to the proposed project, including a No Project/No Build Alternative. The EIR acknowledges that the No Project/No Build Alternative would have less biological resources impacts compared to the proposed project. However, the No Project/No Build Alternative would not accomplish all of project objectives described in Chapter 3, Project Description.

**I146-5:** This comment states that residents of the proposed project will be too far from the nearest bus stop and will need to use cars to travel, increasing traffic congestion, and suggests consideration of a new bus line from the proposed project on Cuyamaca Street and a Bus Rapid

Transit-type bus on new SR-52 express lanes. Research was conducted regarding providing a bus line from the project site to the trolley square area, but it was determined that the ridership would not be high enough at project inception to support a bus line. Per the explanation in Section 4.16.5, Project Impacts and Mitigation Measure, in Section 4.16, Transportation, it states that the applicant has privately funded the SR-52 PSR-PDS with an attachment included in the appendix to the Transportation Impact Analysis (Appendix N). Per the SR-52 PSR-PDS included in the appendix, the applicant has entered into an agreement with Caltrans to identify operational improvements to SR-52 that are intended to relieve congestion.

A bus lane/express lane on SR-52 is a potential solution on SR-52, and since SR-52 is within the state's jurisdiction, Caltrans will make the final determination as to the type of improvements that will be built on SR-52.

1146-6 However, I know that the BRT bus idea is out of the price range for this project and MTS or SANDAG has shown no interest in trying to find funding for their planned future route in the near future. Therefore, Fanita Ranch will only worsen the quality of life for everyone in Santee, and is no reason to proceed any further. Let's not let anyone unwittingly become a part of a large community at the tip of the spear of East County development with obviously a false sense of security, and let's reserve the type of bravery needed to live there to those brave people who fight for our nation instead.

1146-7 If there is one thing that I have learned in this COVID-19 crisis, that is we need to protect the last few remaining wild areas in East San Diego County. They have been a refuge for not only wildlife but also city people trying to escape the pandemic, at least temporarily.

Thank you,

Paul Holloway  
8701 Camden Dr.  
Santee, CA 92071

1146-8 \* see: <https://www.kpbs.org/news/2017/may/02/delicate-vernal-pools-restored-san-diego-county/>  
And <https://www.chaparralconservancy.org/projects/vernal-pool-preservation/>

**I146-6:** This comment states the commenter's general opposition to the proposed project due to concerns over worsening the quality of life for Santee residents. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I146-7:** This comment states the wild areas in East San Diego County have been a refuge to wildlife and city people trying to escape the pandemic. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I146-8:** This comment provides two Internet links. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I147: Vicki Hulbert-Defalque, July 13, 2020

**I147**

**I147-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Vicki Hulbert-Defalque <vldfalque@gmail.com>  
**Sent:** Monday, July 13, 2020 8:10 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

As a former 20 year Fanita Ranch Santee resident, I wish to return to Santee as a retired member of the community. Santee needs an active Seniors housing option. Many residents have lived in Santee for years and when they wish to down size, they are forced to leave Santee in search of suitable housing. I urge you to approve the Fanita Ranch project so I can again become a member of the Santee's active, senior community.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I147-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Vicki Hulbert-Defalque  
2735 Hollister Ter  
Glendale, CA 91206  
vldfalque@gmail.com

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## Comment Letter I148: Samantha Hurst, July 13, 2020

I148

**I148-1:** This comment states the commenter’s opposition to the proposed project and asks how the environmental impacts can continue being justified after the citizens have voted no in the past. Prior votes on past development proposals are not relevant to the current project. The EIR and Appendices prepared for the proposed project analyzed the impacts of the proposed project in accordance with applicable regulations, including CEQA and the CEQA Guidelines, and identified appropriate mitigation measures to reduce significant impacts to the extent feasible in accordance with CEQA Guidelines Section 15126.4. The EIR complies with CEQA Guidelines Section 15043, Authority to Approved Projects Despite Significant Impacts, which states that a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision that (1) there is no feasible way to lessen or avoid the significant effect (see Section 15091), and (2) specifically identified expected benefits from the project outweigh the policy of reducing or avoiding significant environmental impacts of the project (see Section 15093).

**I148-2:** This comment states the proposed project would result in increased fire risk, exponential traffic gridlock, 10

**From:** Samantha Hurst <shurst@health.ucsd.edu>  
**Sent:** Monday, July 13, 2020 3:10 PM  
**To:** Chris Jacobs  
**Subject:** NO on the Fanita Ranch preposed DEIR report

Mr. Chris Jacobs, City of Santee Principle Planner

1148-1 This letter is a statement of **emphatic opposition** to proposed further development of Fanita Ranch. **Santee citizens voted down Fanita Ranch in 1999** by a landslide -- so how is it that as a resident I am facing the demand for approval of this disaster again? When is NO a NO?! **How many more times will we discuss this project at the cost of the public?** (page 3 of Section 1.0 Executive Summary and in other relevant sections). **How can you continue to justify the impact on the environment for a project of this scale by using an evaluation system that was already challenged on its flaws and omissions and replaced?**

1148-2 Santee citizens don't want the Fanita Ranch Development and for numerous **CREDIBLE** reasons: (1) **increased risk of fire hazard dangers** in an already *very high risk fire zone*; (2) **exponential traffic gridlock** estimated at more than a gross total of 31,213 average daily trips; and (3) **10++ years of agitating construction noise**, dust, and air pollution affecting Santee Lakes and surrounding areas. **I live at the western edge of Santee at Weston with all three of these conditions now** ...this project brings nothing but **unattenuated hardship** and added perilous risks for all Santee residents.

1148-3 Additionally, we know that Fanita Hills area is acknowledged as a biological reservoir, which adjoins neighboring open spaces (protected by the county's Multiple Species Conservation Program) with the users of Mission Trails Park. The hikers can now expect to see a reduction if not decimation of many wildlife species in this region. Clearly any further development in Fanita Ranch will destroy or grossly endanger the following species that inhabit the Fanita Hills region: *mountain lions, coyotes, the gray fox*, 18 other mammal species; 21 types of reptiles and amphibians; and over 100 birds. In addition, the Stowe Trail -- a stretch that leads from Santee Lakes through Sycamore Canyon on Fanita Ranch -- is one of the last refuges for the endangered *Quino checkerspot butterflies* and the endangered least *Bell's vireo* songbirds who are already an endangered species in Southern California. **Please list the means by which you intend to protect and preserve the numbers of these naturally occurring species and their habitats from grossly destructive urban sprawl development in Fanita Ranch?**

1148-4 With regard to traffic specifically, it is well known and documented that the only obtainable access routes for the estimated 8,000 new residents within the Fanita Ranch development will be Fanita Parkway or Cuyamaca Street -- **contributing to an additional 15% of Santee's current population using these two roads** alone. The entire proposed project (DEIR pg 35) is calculated to generate a gross total of **31,213 average daily trips**. During AM peak hours it is estimated for 3,198 trips and during PM hours another 2,956 additional trips. **How can you prevent the residential and main corridor streets of Santee from not becoming one massive agglomeration of standstill traffic pileups?** Please produce in your document the legal language necessary for solutions to "if the vibration exceeds 80 vibration decibels, construction activities in the immediate area of the affected receptor shall cease." (Page 62 of Section 1.0 Executive Summary and in other relevant sections).

1148-5 Additionally, we already daily experience the evidence of horrific traffic chokepoints throughout Santee. The current proposal only exacerbates traffic at various intersections and street segments that will be negatively impacted by the amplified traffic resulting from the Fanita Ranch project. **Explain unequivocally how re-painting lane stripes into smaller denser lanes and eliminating bike lanes altogether will actually provide a reduction to traffic?** Cuyamaca is heavily impacted all along its length, but the report claims to be able to mitigate.

1148-6 The draft EIR documents these intersections and streets all of which are given a grade. As stated in the report, if the grade is an E or F, then the project must mitigate the impact at each intersection or street to a grade of D. Preposterous!

In the most Significant areas, such as those listed below, all mitigation measures proposed are **infeasible** for different reasons and therefore result in **Unavoidable Significant** Impact.

- Riverford Road and 67

plus years of construction noise, dust, and air pollution. As demonstrated below, the EIR adequately addresses all of these issues. Section 4.18, Wildfire, analyzed the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (FPP) and Construction Fire Prevention Plan (CFPP) (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will serve letters provided by the Santee Fire Department (SFD) provided in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation

measures to reduce the impacts to transportation; although not to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.12, Noise, analyzed the potential noise impacts as a result of implementation of the proposed project with respect to changes in vehicular transportation noise, stationary noise, aviation noise, and project construction noise and vibration. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts from noise; although not to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.2, Air Quality, evaluated the potential for impacts to air quality due to implementation of the proposed project, including conflicts with the applicable air quality plan, cumulative increase in criteria pollutants, exposure of sensitive receptors to substantial pollutant concentrations, and other emissions such as odors, and recommends mitigation measures to reduce or avoid adverse impacts. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to air quality; although not to below a level of significance. This issue is adequately addressed in the EIR.

**I148-3:** This comment states that development on the project site will destroy or endanger the wildlife species that inhabit

the Fanita Hills region. The comment also lists the species addressed in the EIR and asks by what means they would be protected. Based on information provided in the project-specific Biological Resources Technical Report (Appendix D), the EIR Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species provides mitigation for impacts to wildlife species; EIR Section 4.3.5.2, Threshold 2: Riparian Habitat of Other Sensitive Natural Communities provides mitigation for impacts to habitats used by wildlife species; and EIR Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, provides mitigation for impacts to wildlife corridors. These measures include Preserve Management Plan (BIO-1), Upland Restoration Plan (BIO-2), Narrow Endemic Plant Species (BIO-3), Oak Tree Restoration Plan (BIO-4), Preconstruction Surveys and Avoidance and Minimization Measures for Special-Status Plant Species (BIO-5), Land Use Adjacency Guidelines (BIO-6), Stormwater Pollution Prevention Plan (BIO-7), Approved Biologist (BIO-8), Habitat Preserve Protection (BIO-9), Weed Control Treatments (BIO-10), Argentine Ant Control and Monitoring (BIO-11), Vernal Pool Mitigation Plan (BIO-12), Western Spadefoot Relocation (BIO-13), Nesting Bird Survey (BIO-14), Wetland Mitigation Plan (BIO-15), Coastal Cactus Wren Habitat Management (BIO-16), Brown-Headed Cowbird Trapping (BIO-17), Restoration of Suitable

Habitat for Quino Checkerspot Butterfly and Hermes Copper Butterfly (BIO-18), African Clawed Frog Trapping (BIO-19), Wildlife Protection (BIO-20), Fire Protection Plan (BIO-21), Wildlife Corridor (BIO-22), and Wildlife Undercrossings (BIO-23). Therefore, impacts to wildlife species would be mitigated to less than significant.

- I148-4:** This comment states that the only obtainable access routes for the estimated 8,000 new residents on the project site will be Fanita Parkway or Cuyamaca Street, contributing to an additional 15 percent of the City's current population using these two roads, and questions how the City will prevent the residential and main corridor streets from becoming a massive agglomeration of standstill traffic. The Transportation Impact Analysis (Appendix N) analyzed all Circulation Element roadways and intersections within the City based on City standards. At locations where the addition of project traffic exceeded City standards, mitigation was recommended to bring the facility level of service (LOS) back within City standards. Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian

facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to transportation; although not to below a level of significance.

This comment also requests the legal language necessary for solutions to “if the vibration exceeds 80 vibration decibels, construction activities in the immediate area of the affected receptor shall cease.” It is unclear for which statement in the EIR the commenter is requesting additional language or clarification. The provided quote is not from the EIR. Section 4.12.5.2, Threshold 2: Excessive Groundborne Vibration or Noise, evaluates the potential for construction activities to result in vibration levels in excess of Federal Transit Administration vibration impact criteria. It was determined that construction activities that would require the use of a vibratory roller would have the potential to exceed the vibration impact criteria related to human response (80 VdB) and result in a significant impact. Therefore, Mitigation Measures NOI-3, NOI-4, NOI-8, and NOI-9 are identified to reduce impacts to a less than significant level. Mitigation measure NOI-8, Vibration Best Management Practices, includes a screening distance that would require retention of a qualified acoustician to identify best management

practices to be implemented by the construction contractor to reduce vibration levels to below 80 vibration decibels at the nearest residence. Best management practices would be in place prior to operation of the equipment with the potential to exceed 80 VdB. Additionally, Mitigation Measure NOI-9, Construction Vibration Notification, includes a requirement for the timing of implementation of a vibration monitoring program, if required in response to a complaint. If a complaint is received, a vibration monitoring program will be implemented within 2 working days to reduce vibration to below 80 vibration decibels at the nearest receptor. This issue has been adequately addressed in the EIR.

- I148-5:** The comment states that the City experiences traffic chokepoints daily and that the current proposal exacerbates traffic at various intersections and street segments that will be negatively impacted by the increased traffic resulting from the proposed project. It also requests an explanation of how repainting lane stripes into smaller denser lanes and eliminating bike lanes will provide a reduction to traffic, and states that Cuyamaca is heavily impacted but that the Transportation Study claims to be able to mitigate. The Transportation Impact Analysis (Appendix N) does not recommend smaller lanes or the elimination of bike lanes. Section 4.16, Transportation, analyzed the

potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to transportation; although not to below a level of significance.

**I148-6:** The comment states that the Draft EIR documents the intersections and streets, all of which are given a grade, and that, as stated in the Transportation Impact Analysis (Appendix N), if the grade is an E or F, the project must mitigate the impact at each intersection to a grade of D. It also states that the mitigation measures proposed for the significant areas listed below are infeasible for different reasons and result in unavoidable significant impacts:

- Riverford Road and 67
- Mast Blvd and 52
- El Nopal
- Carlton Oaks
- Mission Gorge and Carlton Hills
- West Hills Parkway



1148-6 cont.

- Mast Blvd and 52
- El Nopal
- Carlton Oaks
- Mission Gorge & Carlton Hills
- West Hills Parkway

1148-7

In final, the Fanita Ranch developers are simply saying to every resident that they intend to build this calamity of a development (raking in money from new buyers for the homes, the loans, and the insurance companies because no established fire insurance company will protect them). And with this development they will generate a monumental loss of wildlife and pristine open spaces and leave all current residents with an unimaginable chaotic traffic situation. And Santee residents can all just suck it up and deal with the misery and eventual personal costs resulting from the push ahead (financial, environmental, property, QOL) ... just so our compromised Mayor and most City Council members (plus upcoming candidates) can continue to receive favor from the HomeFed coffer tills (*conflict of interest monies*) in their political accounts. This not conjecture ... there is written and documented proof.

My hope is that the citizens of Santee can see through the **inherent deceptive unfairness** in this report and be given the opportunity via voters' approval for General Plan Protection Initiative process to vote **No on Fanita Ranch. Adamantly NO on Fanita Ranch. Unwaveringly NO on Fanita Ranch.**

Samantha Hurst, resident

8528 Boulder Way

Santee, CA 92071

—

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The comment is correct that the locations listed have unavoidable significant impacts. For each location, the Transportation Impact Analysis (Appendix N) states the reasons the impacts are significant and unavoidable. For the majority of the locations, it is because the intersection/roadway is located in another jurisdiction, and per CEQA standards, these impacts cannot be considered fully mitigated. Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to transportation; although not to below a level of significance.

**1148-7:** This comment provides the commenter's opinions and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I149: Carolyn Juarez, July 13, 2020

**I149**

**I149-1:** This comment states the commenter’s opposition to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** cj <msjuarez@aol.com>  
**Sent:** Monday, July 13, 2020 12:34 PM  
**To:** Chris Jacobs  
**Cc:** cj  
**Subject:** Fanita Ranch OPPOSE

I149-1 | Mr. Jacobs,  
1 | I am a registered voter and have lived in Santee since the early 70s. I continue to oppose The Fanita Ranch Plan. Please send updates re the Plan Proposal. Thank you.

Carolyn Juarez

10083 Prince Charming Lane  
Santee, CA 92071  
619-659-2151

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## Comment Letter I150: Patti, La Bouff July 13, 2020

**I150**

**I150-1:** This comment states that the proposed project conflicts with the City of Santee’s (City’s) roadway circulation plan and provides inadequate mitigation measures, resulting in a significant cumulative negative traffic impact. The statement that the project “conflicts” with the City’s roadway circulation plan is inaccurate. As described in Section 3.1 and 3.2 of Chapter 3, Project Description, the proposed project would improvement three Santee General Plan Mobility Element streets (Fanita Parkway, Cuyamaca Street, and Magnolia Avenue). With respect to “inadequate” mitigation measures, the commenter does not explain what makes them inadequate. Therefore, no further response is required for this comment. Nonetheless, Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified feasible mitigation measures to reduce the impacts to transportation; although not all impacts would be reduced to below a

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Telephone: (619) 258-4100, extension 182  
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July 12, 2020

Re: Fanita Ranch Draft Revised Environmental Impact Report (EIR)  
Transportation Section 416

I150-1 The EIR shows that the Fanita Ranch project conflicts with the City’s roadway circulation plan, creates over 26,000 additional vehicle trips daily, exacerbates traffic congestion and delay while emitting fossil fuel pollutants, causing harm to the community of Santee. This project attempts to cram 9,500 people into our northern hills, with an insufficient roadway network to accommodate them. The mitigation measures proposed are seriously inadequate with some unlikely to be funded given the economic downturn. The Fanita Ranch projects imposes an overall significant, cumulative, negative traffic impact in Santee.

I150-2 My questions and concerns:  
Why were 20-year-old guidelines used for this traffic impact study? (San Diego Traffic Engineering Council/Institute of Traffic Engineers Guidelines) Were only the “criteria identified” used, or was the entire document used? Were other guidelines available? Do different guidelines identify these criteria differently?

I150-3 Intersection 66. Mast Boulevard/Weston Road: Why is this intersection listed last, instead of approximately #20, where it would have been in sequence along Mast Boulevard, traveling west to east? It appears it was added on at the last minute.

level of significance. The statement that the proposed project would add 9,500 people to the project site is inaccurate. Section 4.13, Population and Housing, identifies that the proposed land use plan with school would add approximately 7,974 residents and 450 employees and the land use plan without school would add approximately 8,145 residents and 200 employees.

- I150-2:** This comment asks why 20-year-old guidelines were used for the traffic impact study and asks if other guidelines were available. The San Diego Traffic Engineering Council (SANTEC) guidelines were only used to determine the study area and the latest guidelines were used. The SANTEC guidelines for conducting transportation studies are similar to those used throughout the San Diego region.
- I150-3:** This comment why the Mast Boulevard/Weston Road intersection is listed last. The Mast Boulevard/Weston Road intersection was signalized after the initial base map and analysis was prepared. A detailed analysis of this intersection was conducted identically to the other 65 intersections in the study area.

- 1150-4 It is clear from the project site map on page 7 that the Weston development of 415 units was not included in the traffic counts for the Existing baseline. Due to its location near the highly problematic Mast Blvd & SR-52 interface, Weston directly impacts the surrounding streets and intersections.
- 1150-5 How many Vehicle Miles Traveled were created by the Weston housing project? Where is the analysis for impact at the intersection of Weston and Mast Boulevard for the completed Weston project? What impacts were created at the intersections of West Hills Parkway and Fanita Parkway along Mast Blvd by the Weston project? Please provide this information.
- 1150-6 Were traffic counts conducted throughout the entire day, or only during peak-hour conditions? What are the times of the day that are included as “peak-hour”?
- 1150-7 Table 4.16-4 Existing Street Segment Operations – Mast Blvd #6-14  
Why is a LOS at E considered to be at “capacity” for a street segment when a grade of E is considered a failing grade? What regulations or guidelines determined that a street segment is at Capacity at LOS E? At capacity suggests to me that the street is completely full of cars, traveling almost bumper-to-bumper at 10 mph. What is the average speed (mph) on a street segment that is filled with cars at capacity, LOS E?
- 1150-8 As to the scores, how can Mast Blvd be given a grade of B, overall, when most Santee citizens have seen this street with bumper-to-bumper cars during peak hours? Is this grade an average, and non-peak hours are factored in with peak hour traffic? Why are these grades so disconnected with what Santee drivers experience daily? Or are these grades, that are 2.5 years old, already so obsolete?
- 1150-9 I have no confidence in Table 4.16.15, grading the Existing + Cumulative + Project impacts. “Capacity” for each street segment along Mast Blvd is expected to be 40,000 average daily trips, which is doubled and unimaginable to drivers who have experienced it pre-pandemic.
- 1150-10 I also have concerns about the negative impacts along Cuyamaca Street. Regardless of LOS scores and adjustments, over 26,000 additional daily trips within the City will heavily impact both Mast Blvd and Cuyamaca Street. And it is clear given the meager pickings of the jurisdiction-available, funded mitigation measures that this project is not anywhere near able to mitigate the damage done by putting almost 9,500 people in our northern hills. Whatever the reason, I now understand why Senate Bill 743 was passed, as it is clear LOS grades do not reflect true operating conditions.

- I150-4:** This comment states the Weston development was not included in traffic counts for the existing baseline. The Weston project was included as a cumulative project in the EIR. Table 4-2, Cumulative Projects in Chapter 4, Environmental Impact Analysis, identifies the Weston project as project 19. The project was included in the cumulative transportation analysis provided in Section 4.16, Transportation, and the Transportation Impact Analysis (Appendix N). This issue is adequately addressed in the EIR.
- I150-5:** This comment asks how many vehicle miles traveled (VMT) were created by the Weston project and asks where this analysis is included in the EIR. As described in Section 4.16, Transportation, the VMT associated with the Weston project is approximately 25 VMT per capita. Table 4.16-17 contains an analysis of the Year 2035 conditions at the Mast Boulevard/Weston Road intersection (intersection 65). The Weston project traffic is included in the Year 2035 analysis and the operations at the West Hills Parkway intersections at Fanita Parkway and Mast Boulevard is included in Table 4.16-17.
- I150-6:** This comment asks if traffic counts were conducted throughout the entire day or only during peak-hour conditions and asks what times of day are included as peak-hour. As described in Section 4.16, Transportation, both 24 hour counts and peak hour counts were

conducted. The peak hours are considered 7:00–9:00 a.m. and 4:00–6:00 p.m.

- I150-7:** This comment asks why a level of service (LOS) E is considered to be at capacity but also considered to be a failing grade. The City considers LOS D the minimum LOS and therefore the transportation study considers LOS E or F conditions as unacceptable and impacts are identified at locations where LOS E or F is calculated. Table 4.16-4 indicates the LOS E capacity (the volume where the road degrades from LOS E to LOS F) consistent with city standards. However, the traffic study considers LOS E a significant impact.

This comment also asks what the average speed is on a street segment that is filled with cars at capacity, LOS E. The average speed on a LOS E roadway is about 20 mph.

- I150-8:** This comment asks how Mast Boulevard can be given a grade of B when most Santee residents have seen this street with bumper to bumper cars during peak hours and asks if the grades are obsolete. The “grade” discussed in the comment is in regard to a street segment analysis and is an average over a 24-hour period. A separate peak hour analysis was also conducted and the results are shown in Table 4.16-3. Intersection 17 (Mast Boulevard at the SR-52) shows LOS F during existing AM peak hour conditions. In addition, part of the reason for the



queue on the westbound Mast Boulevard in the AM peak is caused by the congestion on westbound SR-52.

- I150-9:** This comment states the commenter’s opinion that they have no confidence in Table 4.16.15 grading the Existing + Cumulative + Project impacts. The 40,000 ADT capacity of Mast Boulevard is the City capacity of a 4-lane road and is consistent with the capacity of 4 lane roads used in many other jurisdictions throughout the County of San Diego.
- I150-10:** This comment states the commenter’s concerns with the negative impacts along Cuyamaca Street. As described in Section 4.16, Transportation, an analysis of Fanita Parkway, Mast Boulevard, and Cuyamaca Street was conducted with the addition of the 31,213 proposed project ADT, and with mitigation, it was determined that the roadways can accommodate those trips. Analysis tools consistent with City standards were used.

1150-11 How will the City be able to improve the effectiveness of non-automotive components of the circulation if the streets that require options for mass transit are currently operating at LOS E or F? The Fanita Ranch project will create a traffic log jam at peak hours along the very streets that need transit options. How then is the project not in violation of stated Mobility Element Policy?

1150-12 The County of San Diego Guidelines for Determining Significance – Transportation and Traffic requires development projects to provide associated street improvements necessary to achieve a LOS D or higher. If the developer or analyst has determined that it is infeasible to provide these improvements, what happens then? Please explain what options are included in the various guidelines or regulations that actually Protect the environment? Who makes the determination of infeasibility? And

1150-13 When that occurs, what are the processes and protocols required thereafter? Not even a second opinion, or a project re-draft?

1150-14 In Table 4.16.11, Intersection #55. Buena Vista Avenue/Cuyamaca Street is graded C for Existing LOS (PM peak hours), then graded to D with the project impacts. Why does Table 4.16.14 give this intersection a grade of F for Existing + Cumulative?

1150-15 Where is the discussion regarding this intersection and its impact from a cumulative project? What specifically are the factors that downgraded this intersection so significantly?

1150-17 Are the proposed “multi-purpose” trails along Fanita Parkway and Cuyamaca wheelchair accessible?

1150-18 On page 90, TRA-2 states “with ambient growth assumed from buildout of the Santee General Plan land uses”. What does that mean? What is ambient growth? How is ambient growth measured or projected? How is this different from the buildout of the cumulative projects?

1150-19 Year 2035 baseline. “The Santee General Plan land uses within the site assume the construction of 1,380 residential units...the Year 2035 baseline traffic volumes represent the buildout of the adopted Santee General Plan land uses.” If so, then the project is requesting more than doubling the density by 1,569 units.

1150-20 Table 4.16-14 includes Cumulative Projects, as listed in Chapter 4. The 55 projects listed account for over 2,500 residential units, not including memory care units.

1150-21 When computing the table data for this impact report, were all 2,500 units considered completed and included? If not, what percentage? How many of those projects include a request to increase density or zoning, and not follow Santee General Plan land uses?

**I150-11:** This comment asks how the City will be able to improve the effectiveness of non-automotive components of the circulation if the streets that require options for mass transit are currently operating at LOS E or F. As described in Section 4.16, Transportation, mitigation measures are recommended to mitigate impacts to LOS D or better operations during peak periods unless otherwise noted. In addition, the proposed project would provide new bicycle lanes and pedestrian walkways to enhance non-automotive transportation.

**I150-12:** This comment asks what happens if the developer or analyst has determined that it is infeasible to provide the roadway improvements and who makes this determination. The EIR traffic consultants and City staff together determine the feasibility of available mitigation measures. Per CEQA Guidelines, Section 15126.4, all mitigation measures must be feasible and fully enforceable in order to be set forth in an EIR.

**I150-13:** This comment asks what the process and protocols are required after mitigation is determined to be infeasible and if there is a second opinion or project re-draft. Please refer to response to comment I150-12, which addresses the same issue raised in this comment.

**I150-14:** This comment asks why Table 4.16.14 gives the Buena Vista Avenue/Cuyamaca Street intersection a grade of F for Existing + Cumulative. Table 4.16-11 does not include cumulative traffic such as from the Sharp project on the

southeastern corner of the project intersection and is under construction. Table 4.16-14 included both project and cumulative traffic and the combination of that traffic results in LOS F.

- I150-15:** This comment asks where the discussion regarding the above-mentioned intersection and its impact from a cumulative project is. Cumulative impacts are analyzed in Section 4.16.6, Cumulative Impacts and Mitigation Measures.
- I150-16:** This comment asks what the factors are that downgraded the above-mentioned intersection so significantly. The combination of project and cumulative traffic degrades the intersection to below City standards.
- I150-17:** This question asks if the proposed multi-purpose trails along Fanita Parkway and Cuyamaca wheelchair accessible. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I150-18:** This comment asks what ambient growth means and how this is measured or projected. Ambient traffic is general traffic growth based on the City's General Plan. It is estimated based on the difference between existing traffic and Year 2035 traffic and is separate from cumulative project traffic, which is based on specific "bricks and mortar" projects.

**I150-19:** This comment states the year 2035 baseline and states the project is requesting more than doubling the density by 1,569 units. The comment is correct. As stated in Section 3.12, Discretionary Actions, the proposed project would require a General Plan Amendment to allow 2,949 units with school or 3,008 units without a school on the project site.

**I150-20:** The comment asks if all 2,500 units discussed in the Chapter 4, Environmental Impact Analysis, of the EIR were considered completed and included in the analysis shown in Table 4.16-14, Existing + Cumulative Projects + Project Intersection Operations. Per the language in Chapter 4, all 55 projects listed were included in the near-term analysis.

The comment also asks which projects listed in the cumulative projects summary request an increase in density or zoning, not consistent with the City of Santee General Plan land use. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I150-21:** This comment asks how many cumulative projects include a request to increase density or zoning and not follow the General Plan land uses. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1150-22 What is the tradeoff between this project requesting over twice the density by 1,569 units, VS other smaller, in-fill, “cumulative projects”, who likewise wish to request increased density. I suggest that density would best be spread around the City, and not consolidated in a high-risk fire zone. Increasing this project’s density to such magnitude is the reason it fails.

1150-23 I have serious concerns with the manner in which the Cumulative Projects are barely mentioned, without giving any other information about over 2,500 residential units, either completed, in process or approved. Especially Weston, Carlton Oaks CC, and whichever projects are impacting Buena Vista Avenue. Seriously, 2,500 units is nearly the size of this project!

1150-24 For purposes of this report, how was their impact analyzed and where’s the data?

1150-25 Whose responsibility is it to fund implementation of the proposed TDM Plan outlined in Table 4.16-29? Whose responsibility is it to Maintain the plan? Are fees assessed to support the plan? From whom? The TDM plan did not fully mitigate the VMT impact; does this in any way affect the requirement/compliance to implement and maintain the plan?

1150-26 Regarding Mitigation Measure TRA-17, Mission Gorge & Cuyamaca (#47 intersection) which proposes to create a northbound right-turn lane, why is it important to have a funding mechanism in the current Santee 5-year budget? This measure is not scheduled to be completed until the 2,123<sup>rd</sup> unit is occupied. That could be 15 years away. Is the project expecting the City to fund this improvement in the next year?

1150-27 Given that this project exceeds two of the four cumulative thresholds, creating significant cumulative negative impacts on Santee roads after attempted mitigation, given this project creates an additional 243,266 vehicle miles traveled per day within our City, given the multiple intersections and street segments whose serviceability will fail Santee drivers, given the unlikelihood of funding the proposed improvements to SR-52 necessary to the mitigation plan, given the increased fossil fuel pollutants that cannot be directly mitigated and will cause physical harm to the Santee citizens, I strongly recommend that this EIR be found inadequate and a detriment to the City of Santee, and that the project proposal be sent back as denied.

I thank you for your time.

Sincerely,  
Patti La Bouff

**I150-22:** This comment asks what the tradeoff is between this project requesting over twice the density versus other smaller infill cumulative projects and suggests that density would be best spread around the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I150-23:** This comment states the commenter’s concerns with the manner in which the cumulative projects are barely mentioned. Table 4-2, Cumulative Projects, in Chapter 4 identifies 55 cumulative projects including the name/applicant, description, and status. Table 4.16-2 in Section 4.16 and Table 9-1 of the Transportation Impact Analysis (Appendix N) also list the 55 cumulative projects and indicates the name, description, traffic volume data and status. Table 4.16-14 contains the Existing + Cumulative Projects + Project Intersection Operations, and Table 4.16-15 shows the same for street segment operations. This issue is adequately addressed in the EIR.

**I150-24:** This comment asks how the cumulative impacts were analyzed and asks where the data is. Please refer to response to comment I150-23, which addresses the same issue raised in this comment.

- I150-25:** This comment asks whose responsibility is it to fund implementation of the proposed TDM Plan outlined in Table 4.16-29 and who will maintain the plan. The applicant is responsible to fully fund and fully maintain the TDM plan. Even though the EIR concludes that the TDM plan does not fully mitigate the VMT impacts, and the conditions of approval for the project will require the funding and maintaining of the plan.
- I150-26:** This comment asks about the timing and funding of Mitigation Measure TRA-17. The mitigation measure discusses the fact that the new lane is included in the City Capital Improvement Program (CIP) only for informational purposes. The mitigation is 100 percent funded by the applicant; therefore, it will not matter if the improvement is in the CIP once the mitigation is required to be improved.
- I150-27:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Patti La Bouff <patti@cox.net>  
**Sent:** Monday, July 13, 2020 9:26 AM  
**To:** Chris Jacobs  
**Cc:** patti  
**Subject:** Re: Environmental Impact Report comments Updated

Dear Mr. Jacobs,  
My apologies, but I have one additional question to add to my letter.

1150-28

Regarding the Mitigation Measures TRA-9 and TRA-21 They appear to be the same mitigation, although TRA-9 is about an intersection, and TRA-21 is the street segment.  
The time lapse between construction at the intersection (442nd unit occupied) versus construction along the street segment (1,917th unit occupied) seems untenable.  
Please clarify the extent of construction that will be completed for TRA-9, and clarify the intent of TRA-21 and its timing. Are they the same measure? Or will the intersection be widened first, and then left for 5-10 years before the street segment is widened to create the dual right turn lanes onto the 52 West ramp?

Again, I do appreciate your time.  
Patti La Bouff

> On Jul 13, 2020, at 8:59 AM, Patti La Bouff <patti@cox.net> wrote:  
>  
> Hello Mr. Jacobs  
> Attached please find my letter outlining my questions about the Transportation section of the FRDrEIR. I appreciate your time.  
>  
> Patti La Bouff  
>  
>  
>  
> <FRDrEIRletter.LaBouff.pdf>

**1150-28:** This comment states that Mitigation Measures TRA-9 and TRA-21 appear to be the same, with the exception of one being a street segment and the other an intersection, and asks if they are the same measure. The comment further asks for clarification regarding the extent of construction for Mitigation Measures TRA-9 and TRA-21, including the timing. The commenter is correct. The mitigation measures (TRA-9 and TRA-21) for these impacts are identical. The impact at the Mast Boulevard/SR 52 westbound ramps intersection (TRA-9) would occur once the 442nd unit is occupied, and the recommended mitigation would need to be implemented by that unit. The impact (TRA-21) on the Mast Boulevard segment (between SR-52 and West Hills Parkway) would not occur until the 1,917th unit, which is the reason that number of units is listed for the timing of that improvement. However, due to TRA-9, the mitigation would be implemented by the 442nd unit, which means that the mitigation for TRA-21 would be installed well before it is actually needed to mitigate the impact. The ultimate improvement at the Mast Boulevard/SR 52 westbound ramps intersection, which is listed in the mitigation measure and includes the dual right lanes, would be implemented prior to the 442nd unit.

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## Comment Letter I151: Carol Legard, July 13, 2020

**I151**

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**From:** Carol Legard <clegard@gmail.com>  
**Sent:** Monday, July 13, 2020 3:12 PM  
**To:** Chris Jacobs  
**Subject:** Comments on Draft Revised EIR for Fanita Ranch

1151-1 Thank you for providing the public an opportunity to comment on the revised draft Environmental Impact Report for the proposed Fanita Ranch Project. I am a resident of Santee and live at 9723 Pebble Beach Drive, just west of Santee Lakes. We are in close proximity to the proposed project site.

1151-2 Although significant revisions have been made to the Fanita Ranch since earlier proposals, the proposed project/preferred alternative in the DREIR continues to have significant environmental flaws which will have serious impacts on people living in the neighborhood. I recommend the no build alternative be selected.

I offer the following comments for your consideration:

1151-3 1. The mitigation proposed is insufficient to address the vast increase in traffic that will be created by construction of some 3000 new residences and ca. 8000 residents who all must gain access to their homes from Fanita, Cuyamuca and Magnolia to the south. We have had unbearable traffic as a result of the new Pardee Weston development on Mast Blvd, and construction of Fanita Ranch will make things far worse. Back ups during morning rush hour extend from the I-52 westbound ramp all the way back to Fanita Parkway - Already! The addition of turn lanes, and an additional lane on 52 will not fix the problem of backups along Mast, Carleton Oaks and West Hills. What other options have been considered to move traffic elsewhere?

1151-4 2. Residents of western Santee will be affected by construction noise and dust during the 15 years of proposed construction. My partner and I are over 65 years old and are subject to headaches and sinus problems due to dust and poor air quality. Our quiet neighborhood will be very much

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**I151-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I151-2:** This comment states the commenter’s opinion that the project has significant environmental flaws and recommends that the No Build Alternative be selected. The No Project/No Build Alternative was evaluated in the EIR. EIR Section 6, Alternatives, evaluated a range of reasonable alternatives to the proposed project, or to the location of the proposed project, which would feasibly attain most of the basic objectives of the proposed project in accordance with the CEQA Guidelines Section 15126.6[f][1]. No further response is necessary.

**I151-3:** This comment states the transportation mitigation proposed is insufficient to address the vast increase in traffic that would result from the proposed project and asks what other options have been considered to move traffic elsewhere. Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the

circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project and identified 30 feasible mitigation measures to reduce the impacts to transportation; although not to below a level of significance. This issue is adequately addressed in the EIR.

- I151-4:** This comment states residents will be affected by construction noise and dust during the proposed project construction and there is no way to mitigate these construction impacts on local residents.

Section 4.12, Noise, analyzed the potential noise impacts as a result of implementation of the proposed project with respect project construction noise and vibration. The EIR analyzed the construction noise impacts of the proposed project and identified Mitigation Measures NOI-1 through NOI-4 to reduce the impacts from construction noise to a less than significant level, contrary to what the commenter says. This issue is adequately addressed in the EIR.

Section 4.2, Air Quality, evaluated the potential for dust impacts on air quality due to implementation of the proposed project, and identified Mitigation Measures AIR-1 and AIR-2 to reduce impacts of construction dust. However, it would not reduce it to below a level of significance. This issue is adequately addressed in the EIR.

1151-4 cont. changed by construction noise. There is no way to adequately mitigate these construction impacts on local residents.

1151-5 3. As a retired archaeologist and historic preservation specialist, I found the chapter on Cultural Resources and Tribal Resources (Section 4.4) to be well written and thorough. Two archaeological sites within the area of potential effects have been determined National Register-eligible: CA-SDI-8243 and CA-SDI-8345. Both would be partially protected in place by capping prior to construction, and partially investigated further through excavation in accordance with the SOI's standards. Due to the need to protect information on the location of these sites, it's unclear how likely it is that additional significant resources, and/or human remains in these sites will be subject to excavation and or impacted by construction. Please clarify whether or not the plan for these sites will offer the best possible protection in place for human remains. It appears that the impacts to human remains has been deemed "potentially significant" (Section 4.4.5.3) and that mitigation measure CUL-10 only calls for treating such human remains that may be discovered during excavations and/or construction as "unanticipated" discoveries. Why cannot the City of Santee ensure the protection of human remains in association with these two sites?

1151-6 4. Additionally, the report identifies cumulative impacts to cultural resources as follows: "Due to the scarcity of archaeological resources and the potential for construction activities associated with future development projects to impact these resources, a significant impact to archaeological resources exists." (Section 4.4.6.2). I remain concerned about these cumulative effects.

1151-7 5. Tribal consultation has been ongoing, and I encourage the City to accommodate all concerns raised by the Barona Tribe and other Indian tribes that may be determined to be culturally affiliated with potentially impacts cultural and tribal resources.

It would be my preference that the property and the important cultural resources that are located there be preserved in places. The impacts of this project on a wide range of resources is great, and will result in a significant impact on the human environment.

**I151-5:** This comment asks if the City can ensure the protection of human remains on the project site. Section 4.4, Cultural and Tribal Cultural Resources, specifically Section 4.4.5.3, analyzed the potential for impacts to cultural and tribal cultural resources, including human remains, on the project site due to implementation of the proposed project, and recommends mitigation measures to reduce or avoid adverse impacts. As discussed in Section 4.4.5.3, California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code, Sections 7050.5 and 7052, and California Public Resources Code, Section 5097. Due to the identification of human remains on the project site and extensive disturbance set to take place in the on-site native terrain, impacts to human remains would be potentially significant. Implementation of Mitigation Measure CUL-10 would be implemented to reduce impacts to the disturbance of human remains in recorded and unrecorded sites to a less than significant level. This issue is adequately addressed in the EIR.

**I151-6:** This comment states the commenter's concern about the cumulative impacts to cultural and tribal cultural resources resulting from implementation of the proposed project. Section 4.4, Cultural and Tribal Cultural

Resources, specifically Section 4.4.6, analyzed the whether the proposed project would have a cumulatively considerable contribution to a cumulative cultural or tribal cultural resources impact considering past, present, and probable future projects. While impacts to cultural and tribal cultural resources would be potentially significant, the proposed project includes adequate mitigation measures to mitigate potentially significant impacts to cultural and tribal cultural resources in accordance with CEQA. Therefore, the project's contribution would not be cumulatively considerable. This issue is adequately addressed in the EIR.

- I151-7:** This comment recommends the City accommodate all concerns raised by the Barona Tribe and other Indian tribes that may be determined to be culturally affiliated with potential impacts to cultural and tribal cultural resources. Section 4.4, Cultural and Tribal Cultural Resources, specifically Section 4.4.1.3 and Tribal Cultural Resources Consultation Efforts for the Fanita Ranch Project Memorandum prepared by Rincon (2020) (Confidential Appendix E3), discuss the tribal consultation efforts undertaken by the proposed project. This issue is adequately addressed in the EIR.

Santee would be better served by permitting smaller projects that take advantage of areas where infill and new construction would have a much smaller impact.

1151-8 | I am hopeful that the General Plan Initiative passes in November and the people have a chance to vote on developments that exceed General Plan Zoning limits.

Thank you for providing this opportunity to comment.

**I151-8:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I152: Carly Lobenstein, July 13, 2020

**I152**

**I152-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Carly Lobenstein <carlyzell@gmail.com>  
**Sent:** Monday, July 13, 2020 7:54 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I152-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Carly Lobenstein  
7518 Eagle Dr  
Santee, CA 92071  
carlyzell@gmail.com

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## Comment Letter I153: Jason Lobenstein, July 13, 2020

**I153**

**I153-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Jason Lobenstein <jlobenstein@gmail.com>  
**Sent:** Monday, July 13, 2020 7:57 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I153-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Jason Lobenstein  
7518 Eagle Dr  
Santee, CA 92071  
jlobenstein@gmail.com

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## Comment Letter I154: Stacey LoMedico, July 13, 2020

**I154**

**I154-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Stacey LoMedico <stalomed12@gmail.com>  
**Sent:** Monday, July 13, 2020 4:42 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I154-1 | Fanita Ranch in some form was always a part of Santee's growth. This plan, as the DEIR shows commits to 76% open space, with numerous bikeways/trails connections. It helps by building a fire station, and provide much needed funding for transportation improvements that are needed NOW.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Stacey LoMedico  
10963 Hillcreek Rd  
Santee, CA 92071  
stalomed12@gmail.com

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## Comment Letter I155: Rebekah Loveless, July 13, 2020

**I155**

**I155-1:** This comment requests preparation of a recovery plan and cultural and tribal cultural resources mitigation measures be carried out by a qualified team. A Cultural Resources Mitigation and Monitoring Program document is required under Mitigation Measure CUL-4 as discussed in Section 4.4.5.2 of the EIR. The Cultural Resources mitigation measures require that they be carried out by a qualified archaeologist who meets or exceeds the Secretary of the Interior’s Professional Qualification’s Standards for archaeology. In addition, Mitigation Measure CUL-6 requires that a minimum of one Native American monitor shall be present during ground-disturbing activity for project construction, and the Native American monitors shall be of Kumeyaay descent. Mitigation Measure CUL-6 has been revised to further clarify the qualifications of the Native American Monitor:

**CUL-6: Native American Construction Monitoring.** A minimum of one Native American Monitor shall be present during ground-disturbing activity for project construction, including but not limited to site clearing, grubbing, trenching, and excavation, for the duration of the proposed project or until the qualified archaeologist determines monitoring is no longer necessary. The Native American monitors shall be of Kumeyaay descent with ancestral ties to the San

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**From:** Rebekah Loveless <rebekah@loveless-linton.com>  
**Sent:** Monday, July 13, 2020 3:22 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

Dear Mr. Jacobs,

As a Kumeyaay owned and operated Cultural Resources Management company, we have many concerns. The most pressing concern is the need for appropriately qualified people to monitor and conduct the archaeo/cultural monitoring. In addition to a well qualified **AND reputable** archaeologist, there MUST be a plan for the recovery of ancestral remains, because you will have more. We encourage a well qualified team and to follow the CA HSC 7050.5 to the letter. Have a qualified, Kumeyaay supported osteologist in addition to a contract with the SD OME Forensic Anthropologist. The way identification was handled on Phase I and II were completely insufficient and tragic. Please do better during development.

I155-1 Please consider awarding additional points to contractors that have a well qualified archaeological and Kumeyaay team. Additionally, it often falls on the shoulders of the project to handle and pay for additional efforts that are the result of unanticipated discoveries. Again, please have a plan that allows for a budget to respectfully, ethically and legally handle all cultural material that will be disinterred as a result of the project.

PLEASE PLEASE PLEASE have the appropriate team, planning and budget. This is a controversial and heartbreaking project for many. This report is one step in a long drawn out process that has already had many avoidable fails that I hope acted as learning experiences for the City of Santee.

In addition to my professional opinion, I am former resident of Santee and a West Hills alumni. I hope the City has a sufficient plan for traffic. 3 hours to get out of Santee is unacceptable. The current infrastructure cannot support it.

Please feel free to contact me with any questions or additional comments.

Rebekah Loveless  
 Archaeological Principal  
 LovelessLinton, Inc.  
 619.922.0718

Diego region and at minimum 1 year of monitoring experience within Kumeyaay ancestral territory. The Native American monitors shall prepare daily logs and submit weekly updates to the qualified archaeologist and the Project Planner at the City of Santee. In addition, the Native American monitors shall prepare and submit a summary statement upon completion of monitoring to include in the Cultural Resources Monitoring Report prepared for the proposed project (see Mitigation Measure CUL-5). The Project Planner at the City of Santee shall review and include the summary statement as part of the cultural resources monitoring report prepared for the proposed project.

In addition, the Native American monitoring requirements identified in Mitigation Measures CUL-1, CUL-2, CUL-4, CUL-5, CUL-7, CUL-9, and CUL-11 have been revised to require the same qualifications as Mitigation Measure CUL-6. All mitigation measures identified in the EIR would be made enforceable conditions of approval for the proposed project if approved by the City of Santee (City), consistent with California Public Resources Code, Section 21081.6(b), and CEQA Guidelines, Section 15126.4(a)(2). The City would also adopt a mitigation monitoring and reporting program for all mitigation measures imposed on the proposed project that is designed to ensure compliance during project implementation, consistent with California Public Resources Code, Section 21081.6(a)(1).

Further, the proposed project would be subject to a Development Agreement between the City and the applicant specifying the obligations of both parties. See also Section 2.4.3 of the EIR (CEQA Findings and Mitigation Monitoring and Reporting Program) and Section 3.12 (Discretionary Actions).

Traffic impacts related to the proposed project have been addressed in Section 4.16, Transportation, of the EIR. The remainder of the comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I156: Janet A. McLees, July 13, 2020

**I156**

**I156-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I156-2:** This comment discussed fire safety and evacuation and asks what services, both physical and mental, will be in place to help people evacuate during a wildfire emergency. Section 4.18, Wildfire, in the EIR analyzes the potential impacts of increased wildfires and evacuation that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (FPP) and Construction Fire Prevention Plan (CFPP) (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department (SFD) provided in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire and evacuation safety. Section 15002 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA) identifies the basic

July 13, 2020

Chris Jacobs, Principal Planner

Department of Development Services

RE: Fanita Ranch Revised Draft Environmental Impact Report

Dear Mr. Jacobs,

I156-1

Thank you for your work on this development.

Fire safety and evacuations for this high fire risk area:

I156-2

Have you watched the Fanita Ranch acres burn like I have? Have you housed and rescued friends that were panicked as I have? What mental health actions are in place for these future residents that will be evacuated from Fanita Ranch? What services will be in place that will help them be ready for these likely evacuations in terms of both the physical evacuations and the mental health aspects? Will there be enough public evacuation sites available? Where will they be located? What notifications in case of fire will be used? Will these residents have enough time to evacuate? What will happen if routes are blocked due to fallen utility poles, trees and in case of traffic accidents? I also see an additional problem with campers at the Santee Lakes campground. What will happen when they too need to evacuate concurrent with Fanita Ranch? Won't the motor homes, trailers, trucks and cars merging onto Fanita Parkway cause additional problems to the evacuation? What have you done to mitigate this potential for disaster other than the additional lanes planned for Fanita Parkway? Is there an alternate route planned for these campers that avoids Fanita Parkway?

I156-3

As person who has an M.A. and California Credential and has worked with children and adults for decades with Language, Speech and Hearing difficulties, cognitive challenges, and reading disabilities, what special evacuation procedures will be put in place for our special needs populations? I see that seniors, many of which will have hearing disabilities, are located in a more remote section of Fanita Ranch. How will you ensure that they will receive an emergency warning and have time and help to evacuate? Since many of our seniors do not drive, what special services will be available to them in a fire evacuation emergency?

I156-4

I156-5

I assume that you will acknowledge receipt of this letter and look forward to your answers to my very real concerns. The EIR deciphering is very difficult for lay persons.

Sincerely,

Janet A. McLees, M.A. Speech Pathology and Audiology

8805 Carmir Dr.

Santee Resident

JANETANNMC@YAHOO.COM

purposes of CEQA, the first of which is to inform decision makers and the public about the potential significant environmental effects of proposed activities. Mental health services are not within the purview of CEQA. This issue is adequately addressed in the EIR.

**I156-3:** This comment asks whether there are enough evacuation sites available, where they are located, what notifications will be provided, whether there is enough time to evacuate, what happens if road blockages occur, and what impacts the Santee Lakes recreational vehicles may have on evacuations. Thematic Response – Evacuation provides details regarding how evacuations are planned and implemented in the City of Santee and San Diego County along with estimated evacuation timelines. Further, Appendix P2, Wildland Fire Evacuation Plan, provides details regarding designation of evacuation sites, where they may be located (typically identified during an evacuation, not before), what happens if unforeseen issues arise, and how traffic congestion is managed by law enforcement personnel. Because the comment does not raise new concerns that have not been adequately addressed in the EIR, there is no need for additional analysis or response.

**I156-4:** The comment questions what special arrangements would be made for special needs persons within the proposed project for evacuation notifications and transportation, if needed. As summarized in Appendix

P2, Wildland Fire Evacuation Plan, special needs persons would be directed by the County Emergency Operations Plan and the Fanita Ranch Wildland Fire Evacuation Plan to register for assistance so that during an emergency event, they could be provided the specialized assistance they may need. However, special needs residents are ultimately responsible for their own well-being and would be advised to take a proactive approach to arrange for assistance from neighbors and the community, as well as other non-profit organizations. The age-restricted neighborhood would be located near the Village Center and the on-site fire station and in an area where wildfire behavior is predicted to be less aggressive due to fuels and terrain. Regardless, the same evacuation approach would be implemented for seniors and special needs persons as with the community at large and that is to follow pre-planned and adaptive approaches that are based on the fire event. Thematic Response – Evacuation provides details regarding how evacuations are planned and implemented and agencies responsible for evacuations understand the special needs of some residents and build appropriate responses into the overall evacuation approach. Lastly, the proposed project, like virtually every master planned community in San Diego County approved over the last 5 years, enjoys the benefit of meeting high ignition-resistant standards that enable evacuation managers the contingency option of directing

residents to shelter in their protected homes or at other designated areas within the proposed project footprint. Because this comment asks questions and does not raise issues pertaining to the EIR analysis or conclusions, no further response is required.

- I156-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I157: David McNeil, July 13, 2020

**I157**

**I157-1:** This comment provides introductory statements and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. The comment refers to a 2009 comment letter submitted on a former project at the project site. Those comments were responded to based on the former project design. The 2009 comments are not specifically applicable to the 2020 project and should be resubmitted based on the 2020 EIR.

**I157-2:** This comment states that the proposed project is within the Very High Fire Hazard Severity Zone (VHFHSZ) and is surrounded by chaparral to the northeast and at the ingress and egress routes, then concludes these conditions would place the public and firefighters at high risk. The comment is accurate that the proposed project is within an area designated VHFHSZ. This designation does not mean that an area is unsafe to build, but rather, indicates that special construction materials and methods will be mandated. Contrary to the comment’s assertion, the vegetation in the northeastern portion of the site and its egress routes is not considered appropriately classified as FM 4. The comment appears to be utilizing information from the 2007 Fire Protection Plan (FPP). The fire behavior modeling conducted in the 2007 FPP used one of the original fuel models (FM 4) that has

POB 513  
Gardnerville, NV 89410

July 13, 2020

Mr. Chris Jacobs, Principal Planner  
Department of Development Services  
Santee City Hall, Building 4  
10601 Magnolia Avenue  
Santee, CA 92071  
Email: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

**Subject: Fanita Ranch Revised Draft Environmental Impact Report “RDEIR”**

Dear Mr. Jacobs,

I157-1 These comments focus upon fire safety associated with the Fanita Ranch Revised DEIR and supplement my comments dated June 15, 2009 on the 2007 Fire Protection Plan (FPP 2007). Comments are limited to my areas of expertise in fire and land use development permitting review. All points in my 2009 letter remain relevant to the current project proposal.

I157-2 As disclosed by the RDEIR, the project site is located within a Very High Fire Hazard Severity Zone and is subject to severe wildland fire behavior. Fuels include FM4 chaparral, which would surround the island of development on the northeast portion of the property and its ingress/egress routes. FM4 chaparral burns at high intensity even under moderate weather conditions. These conditions would place the public and firefighters at high risk.

I157-3 While all of Fanita is subject to high intensity burns, the northern portion of the site has the greatest alignment with regional open space and the Santa Ana wind-driven fire corridor. Therefore, alternatives to the project that eliminate, relocate, or consolidate development to the existing wildland urban interface should be a high priority to avoid significant adverse safety impacts.

I157-4 Public Safety Power Shutoff (PSPS) programs have been implemented by California electric utilities in recent years as extreme fire conditions and power line failures have resulted in increasingly devastating wildfires across California.<sup>1</sup> In 2019, PSPS actions occurred across the state, including affected areas of Poway and Ramona.<sup>2</sup> If an ignition occurs during a PSPS that affects the project site, any portions of the site that require pumping for adequate water pressure would be adversely impacted. This is a significant impact that could disrupt the ability to fight a wildfire. The RDEIR has not disclosed and adequately considered the impacts of fires impacting the site during PSPS events authorized by the California Public Utilities Code Sections 451 and 399.2(a).

<sup>1</sup> <https://www.cpuc.ca.gov/deenergization/>

<sup>2</sup> [https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/New%20Updates/2019/Nov.%2015%202019%20SDGE%20ESRB-8%20Report%20for%20Oct.%2020-Nov.%201%202019.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/New%20Updates/2019/Nov.%2015%202019%20SDGE%20ESRB-8%20Report%20for%20Oct.%2020-Nov.%201%202019.pdf)

consistently been demonstrated to over predict fire behavior. Since that time, more accurate and customized fuel models have been developed for Southern California. The fire behavior analyst that conducted modeling for the proposed project relied on his nearly 35 years of experience fighting wildfires and modeling fire behavior for federal, state, and local fire agencies. Please refer to Section 9 of the 2020 FPP (Appendix P1) for details on the fire behavior modeling differences between 2020 and 2007 FPPs.

- I157-3:** This comment states the northern portion of the site has the greatest alignment with regional open space and the Santa Ana wind-driven fire corridor, and urges that alternatives that eliminate, relocate, or consolidate development to the existing wildland urban interface should be a high priority. As detailed in the FPP, and in the comment, the analysis considered the area's fire history and fire behavior based on site-specific fire environment inputs, among the comprehensive fire environment assessment factors. Based on that fire history, Section 2.2.7 of the FPP (Appendix P1) states that the site will experience wildfire again, and because of that, the Project has incorporated design features that have been demonstrated to minimize wildfire exposure and impacts to persons and property. Please refer to the Thematic Response – Fire Protection and Safety for

additional details regarding the wildfire protection features customized for the proposed project.

- I157-4:** This comment states that the EIR has not disclosed and adequately considered the impacts of fires impacting the site during a public safety power shutoff (PSPS) events authorized by the California Public Utilities Code, Sections 451 and 399.2(a). Public Safety Power Shutoff is completely managed by San Diego Gas & Electric, which can turn power off to specific areas to minimize fire ignitions. Note that the proposed project will underground all electrical lines and the distribution lines, that are the highest wildfire igniters, will not cause ignitions as they will be subterranean. Because the area's electrical transmission lines will be below ground, there would not be a need to de-energize them.

1157-5	<p>The RDEIR indicates that 21 lots in a portion of the northeast "Vineyard Village" are subject to inadequate pressure without private pumps, but has not considered the issue in the context of fire during a PSPS. Will there be back-up power sources for any and all of the pumps required to serve the project? If so what are their sources of power? (RDEIR, Table 7, p. 3-60)</p>
1157-6	<p>Some of the Fuel Management Zones are extreme in relation to the 100 feet of defensible space standard. Expansive FMZs will be counterproductive when wind-driven embers or other sparks meet invasive fuels with lower ignition points than more ignition resistant shrubs. Invasive annual grasses that create a more flammable landscape increase the potential for erosion and impacts to wildlife. The sheer size of the FMZs introduces a management burden that is impractical and unlikely to be kept to standard over time. And the FMZs would do little to diminish ember storms originating from adjacent vegetation and beyond.</p>
1157-7	<p>In contrast to FPP 2007, FPP 2020 chose input variables to reduce the BehavePlus modeling flame height calculations down from 95 feet to 66 feet. Considering that extremes are becoming the new normal, it would have been more appropriate to adjust the variables in the opposite direction. For instance, BehavePlus inputs for the same FM4 chaparral fuel model could be adjusted to generate flame lengths over 140 feet. Even FPP 2007 acknowledged flame heights could be generated in excess of 100 feet. Adjusting variable inputs may psychologically boost the land entitlement process, but it will not change the public safety threat represented by the actual fuel, topography and increasing frequency of hazardous fire weather conditions within the region brought about by climate change.</p>
1157-8	<p>Steep drainages with burning chaparral will funnel heat through the topographic chimneys to the homes above/windward. Homes and roads located on ridge top saddles will receive the brunt of the energy discharged as the wind is squeezed and accelerated by the topography. Locating homes in these locations is <b>negligent</b>.</p>
1157-9	<p>Late evacuation over a ridge top road through a saddle with fire below would be deadly. The tendency is for the public to wait as long as possible before evacuating. Hope and denial can outweigh observable facts and lead to paralysis. Authorities recognize this problem. In the deadly Tubbs and Camp Fires, which occurred in Northern California in 2017 and 2018, respectively, authorities did not issue evacuation orders in some areas out of fear that it was too late.</p>
1157-10	<p>In the Camp Fire specifically, a perishing resident didn't evacuate with her surviving daughter precisely because an evacuation advisory was not issued to her or received by the time the daughter felt she must make a decision. The complicating factors of human psychology and challenges of communication merged into confusion and tragedy. Exercising responsible land use at the planning stage can avoid similar scenarios. The geography of "Vineyard Village" assures that authorities and residents alike must be able to make this same calculation and reach the correct conclusions. There is a long and growing list of public and firefighter fatalities that prove theoretical paper decisions are much more difficult in practice.</p>

**1157-5:** This comment inquires if there will be a backup power source for any and all of the pumps required to serve the proposed project and what the source of power would be in the context of PSPS. As stated in Section 4.18.5.2 in the EIR and the FPP (Section 3 and Section 6.4.2) provided in Appendix P1, 21 homes were identified as having residual pressures ranging from 29 psi to 40 psi at these lots during peak hour demands. This means that all of the sprinkler heads will operate in the event of a fire, but sprinkler head coverage would range from normal at first floor sprinkler heads to significantly reduced coverages at upstairs sprinkler heads. For these marginal pressure lots, a private booster pump with a secondary power source will be installed. This will ensure adequate domestic pressures to these residences even in the event of a power outage.

**1157-6:** This comment states that some of the fuel management zones (FMZs) are extreme in relation to the 100-foot defensible space standard and introduce a management burden that is unlikely to be maintained over time, and would do little to diminish ember storms originating from adjacent vegetation. The comment inaccurately claims that fuel modification zones are extended to new extremes. This is a false statement. Fuel modification zones are established through the site-specific environment, fire behavior modeling, and experienced fire fighter and fire protection planner judgement. In



some locations, the FMZ has been extended to 150 feet, which is 50 percent larger than the standard City FMZ, but is significantly less than required for other projects, including Newland Sierra, which includes 250 foot wide FMZs and all Orange County Fire Authority FMZs, which are 170 feet wide. The FPP details the fire protection system, including structural ignition resistance, access, landscape, fire response, water availability, and others, that combine to minimize the potential for a wildland fire to transition into an urban fire. This multi-layered system includes redundancies that limit the potential for fire spread beyond the perimeter FMZs, protect structures from airborne embers, the leading cause for wildfire structure loss, and provide fast response throughout the site. The approach for new communities built to the requirements of the proposed project is to exclude fire from within the developed areas. There are many examples of fuel modification zones for master planned communities have been maintained consistently throughout Southern California, with 4S Ranch, Cielo, The Crosby, Castle Creek, and Emerald Heights providing local examples. Success over the long term lies with an active fire authority that has the experience and personnel to carry out inspections. Realizing that not all fire agencies have the personnel to conduct these types of inspections, or do not have the capacity, the 2020 FPP mandates that twice annual FMZ inspections will occur by an homeowners

association-funded third party that reports back to the Santee Fire Department (SFD). This provides the assurance that the homeowners association conducts the specified maintenance and that it is completed throughout the year, instead of once annually as it is in most communities.

- I157-7:** This comment claims that the fire behavior modeling in the 2020 FPP does not use correct inputs. This opinion is not supported by any factual fire behavior data, experience, or examples other than referring to the 2007 FPP prepared without the benefit of the Southern California specific fuel models that more accurately represent actual fire behavior predictions. Please note that fire behavior modeling in San Diego County follows guidelines that include using remote automated weather stations, of which the Camp Elliot station is the nearest site and is considered similar to the project site. Experienced fire behavior analysts adjust the inputs based on the specific site conditions, primarily vegetation now, at climax condition, and in the fuel modification zones, wind, temperature, and humidity as well as slopes, aspect, and other categories. Dudek's fire behavior analysts spent considerable time using their professional judgement and experience to apply the correct fuel models and other inputs. Differences between the 2007 fire behavior modeling and 2020 FPP modeling are detailed in Section 9 of the 2020 FPP.

- I157-8:** This comment states steep drainages with burning chaparral will funnel heat through topographic chimneys, and homes and roads located on ridge top saddles will be most impacted; therefore, constructing homes in these locations is negligent. The 2020 FPP specifically evaluates the terrain, fuels, and its fire potential. Where terrain would facilitate fire spread toward the developed areas, specific FMZ customizations were developed to provide additional buffer to mitigate the more aggressive fire behavior. The developed areas are congregated in large areas void of vegetation pathways that could facilitate wildfire into the community. Large, maintained buffers occur around the Proposed Project to keep active fire away from the community. Ignition resistant structures and maintained landscapes throughout the interior of the proposed project protect against airborne embers. The concern presented by the comment is addressed through the 2020 FPP and SFD requirements.
- I157-9:** This comment raises concerns that late evacuation over a ridge top road through a saddle with a fire below would be deadly. The comment indicates that late evacuations would be potentially dangerous. The proposed project's Wildland Fire Evacuation Plan (Appendix P2) states a similar conclusion, but not only for the proposed project, but also for any existing community. Late evacuations are inherently dangerous because the active fire area is

close to people. The proposed project's FPP provided in Appendix P1 and Wildland Fire Evacuation Plan provided in Appendix P2 have considered this and developed a contingency plan for the scenario where a fire ignites close to the proposed project. Normally, a distant wildfire would enable the typical phased evacuation of areas that may result in vehicle congestion, but that has ample time to move vehicles out of designated areas. In a short-notice event, there is usually no alternative to proceeding with an evacuation. However, for the proposed project, the ability to begin evacuating people from designated areas and then halt the evacuation and temporarily shelter people in their protected homes or in the village core, for example, would be available to emergency managers, giving them more flexibility and a contingency safety net that is not available to older, more vulnerable construction neighborhoods. Although the preferred approach will always be to evacuate and evacuate early, having a contingency provides another level of fire safety. Please refer to Thematic Response – Evacuation for details regarding evacuation planning and implementation and Thematic Response – Northern California Contrast for descriptions of the substantial differences between the Tubbs and Camp fire environments compared to the proposed project fire environment.

**I157-10:** This comment provides an example of a death resulting from confusion regarding evacuation orders and implies that residents of Vineyard Village would have to make the same calculations regarding evacuation that could lead to fatalities. It is important to note that the proposed project and local evacuation managers focus on early evacuation, whenever possible. In the case of a late evacuation (short-notice event), the proposed project provides a contingency plan where residents and fire fighters can temporarily shelter within the site’s structures. Please refer to Thematic Response – Fire Protection and Safety for additional details. Please also refer to the Thematic Response – Evacuation and to the Wildland Fire Evacuation Plan (Appendix P2) for details regarding evacuation planning and implementation in the City of Santee and the County of San Diego. Orderly movement of people is the result of planning, training, education, and awareness, all of which are promoted in San Diego County and by the SFD. “Evacuation” has been the standard term used for emergency movement of people and implies imminent or threatening danger. The term in this Wildland Fire Evacuation Plan (Appendix P2), and under the “Ready, Set, Go!” concept, indicates that there is a perceived threat to persons and movement out of the area is necessary, but will occur according to a pre-planned and practiced protocol, reducing the potential for panic. Citizen reactions may vary during an

evacuation event, although several studies indicate that orderly movement during wildfire and other emergencies is not typically unmanageable. Evacuation can be made even less problematic through diligent public education and emergency personnel training and familiarity. Social science research literature indicates that reactions to warnings follow certain behavior patterns that are defined by people's perceptions (Aguirre 1994; Drabek 1991; Fitzpatrick and Mileti 1994; Gordon 2006; Collins 2004) and are not unpredictable. In summary, warnings received from credible sources by people who are aware (or have been made aware) of the potential risk have the effect of an orderly decision process that typically results in successful evacuation. This success is heightened when evacuations are not foreign to residents (Quarentelli and Dynes 1977; Lindell and Perry 2004) and will occur on the project site. Further, in all but the rarest circumstances, evacuees will be receiving information from credible sources during an evacuation. Further, it would be anticipated that law enforcement and/or fire personnel would be on site to help direct traffic and would be viewed by evacuees as knowledgeable and credible. The importance of training these personnel cannot be understated and annual education and training regarding fire safety and evacuation events will be essential for successful future evacuations.

- 1157-11 A calculation to shelter or evacuate is complicated by variables beyond residents' ability to resolve prior to an event. The density of the development has designed overlapping Home Ignition Zones that make a cluster burn likely if one or more homes ignite due to human error (open window) or intense convective activity (a fire whirl or tornado). Residents that stay are placing a bet that thousands of their neighbors have not made an error that will impact them or that severe weather will not breach their shelters. The applicant has carried forward this flaw from 2007 and has now doubled-down on it.
- 1157-12 FPP 2020 fails to consider how evacuation of the project significantly impacts the feasibility of evacuating the established WUI with less fire resistant older homes. Virtually all of the homes on the existing WUI are highly susceptible to embers. Many homes would need to be evacuated as occurred during the Cedar Fire. A shift in wind direction that put these homes on the head of a wind-driven fire rather than the flank would result in lost structures when embers penetrate attic vents.
- 1157-13 The lack of analysis is not surprising considering the mixed and confusing message of the FPP with regard to shelter-or-evacuate decisions. What are the time estimates for evacuating the project independently?
- 1157-14 What are the time estimates for evacuation when adding in zones of the established WUI under various scenarios?
- 1157-15 For instance, what is the scenario for an ignition from SR-67 and points east of San Vicente Reservoir?
- 1157-16 The Revised DEIR fails to consider the significant impact on the established WUI of abandoning the fuel load management prescribed in the 2007 FPP. Mitigation to harden the established WUI to ember intrusion should be required.
- 1157-17 Without fuel load management, fuel loads will grow more hazardous and the significant impact of eliminating backfiring operations at the existing WUI as a suppression tactic becomes more significant. Timing is critical for success and firefighters must know that their firing tactic will not put others at risk. It is not feasible to backfire over routes potentially in use for late evacuation or the developed areas the routes are connected to. Fuel loads will grow, but a tool to eliminate the hazard during an actual incident has been removed by the site plan.
- 1157-18 Mitigation to harden the established WUI to ember intrusion should be required for this significant impact as well. Inability to reduce embers and manage the intensity of the main fire front with a properly timed backfire puts the established WUI at higher risk of loss of life and property.
- 1157-19 The "Evacuation Plan" is simplistic and lacks detail. The document states:  
*"The decision on whether to evacuate or shelter-in-place is carefully considered with the timing and nature of the incident (San Diego County 2014). Sheltering-in-place is the preferred method of protection for people that are not directly impacted or in the direct path of a hazard."*  
 (p. 18)

**1157-11:** This comment states that the decision to shelter-in-place or evacuate is too complicated prior to an event, and the proposed project had carried forward flaws from 2007. The referenced home spacing information in the Fire Protection Plan (FPP), Section 2.2.8, provided in Appendix P1 is provided to illustrate that research supports development like the proposed project in terms of condensing the developed areas, which equates to higher density. This reduces wildland urban interface, provides a more defensible edge, and equates to large fire breaks on the landscape with virtually no fire pathways into the developed areas due to the conversion of vegetated landscapes to ignition resistant landscapes and buffers. Cluster burning is a phenomenon experienced in older communities or communities that did not provide a system of fire protection. When a structure ignites, from an ember penetrating into the interior or from direct heat/flame on the structure's surface, or even from an interior fire, when close to adjacent structures, these structures may be subject to ignition, if not properly protected. However, new communities in Santee are required to include a redundant system of protections that minimize this potential. For example, as previously mentioned, the landscape and FMZs are designed and maintained to avoid direct heat or flame on community buildings. There would not be an ignition from direct heat or flame. Second, the buildings are designed to prevent

ember penetration, minimizing the potential for this type of ignition (there is still a low probability if a window is left open during a wildfire). Further, if an interior fire ignites, the fire sprinklers have proven over time to perform extremely well at extinguishing or keeping the fire to the room of origin, minimizing the potential for an adjacent structure to be subject to direct heat/flames. Additionally, the exteriors of the buildings, including windows, are required to meet fire ratings that also minimize the potential for ignition. Lastly, fast response from an on-site fire station and a robust regional wildfire defense capability, further minimizes the potential for cluster burning in a new, ignition-resistant community.

**I157-12:** This comment states that the Fire Protection Plan (FPP) fails to consider how evacuation of the proposed project significantly impacts the feasibility of evacuating the established WUI with less fire-resistant homes. Evacuation of existing homes would be managed by San Diego County Sheriff's Department along with various other responding agencies. It can be assumed that there would be additional time needed to evacuate existing residents with the addition of the proposed project, but implementation of evacuation strategies including phased approaches, intersection control and preparedness training helps minimize potential impacts. Please refer to the Thematic Response – Evacuation



regarding the evacuation process and law enforcement approach to moving large numbers of people.

- I157-13:** This comment inquires about the time estimates for evacuating the proposed project independently. Please refer to the Thematic Response – Evacuation for proposed project evacuation time estimates.
- I157-14:** This comment inquires about the time estimates for evacuating existing development plus the proposed project under different scenarios. The comment requests analysis not provided in the EIR and not required by CEQA or any other policy, regulation, or code.
- I157-15:** This comment inquires about an evacuation scenario for an ignition from SR-67 and moving east of San Vicente Reservoir. The comment requests analysis not provided in the EIR and not required by CEQA or any other policy, regulation, or code.
- I157-16:** This comment states mitigation to harden the established WUI to ember intrusion should be required. The 2020 Fire Protection Plan (FPP) provided in Appendix P1 details why open space fuel reduction is unnecessary, and is based on the fact that fire science indicates the best way to protect structures is by vegetation management at and near the structures. The comment suggests that because there is no fuel modification proposed in the open space, the neighboring communities will be at higher risk.

However, the goal is to preclude fire from areas for long durations to enable the shrub lands to age and function, as they are relatively resistant to ignitions compared to flashy fuels. As explained in the Thematic Response – Fire Protection and Safety and the FPP (Section 9) (Appendix P1), fire science indicates that protecting communities equates to building ignition resistant structures and then providing fuel modification next to and near the structures. This is consistent with the proposed project’s approach along with providing fuel modification on the project’s perimeter as a benefit to existing, more fire vulnerable structures. The proposed project would also convert a large area of natural fuels to ignition resistant landscapes, creating a large fuel break in the middle of the proposed project, further benefiting neighboring communities.

**I157-17:** This comment states without fuel load management fuel loads will become more hazardous and would eliminate backfiring operations at existing WUI as a suppression tactic, which is a tool eliminated by the proposed project’s site plan. Please refer to response to comment I157-16 and Thematic Response – Fire Protection and Safety for additional details regarding the fuel reduction approach and why efforts are focused closer to buildings and not in open space. While it is true that the proposed project could alter some firefighting strategies, potentially including backfiring, the proposed project

also provides operational advantages that are not currently available. For example, the proposed project presents a large fuel break. It provides anchor points for fire retardant drops that can intersect with the perimeter FMZs. It provides protected access for ground-based fire fighters and fire engines that currently would not be utilized due to potential exposure.

**I157-18:** This comment restates mitigation to harden the established WUI to ember intrusion should be required. The comment suggests that hardening the wildland urban interface should be required as a mitigation for not providing open space fuel reductions. Responses to comments I157-16 and I157-17, along with Thematic Response – Fire Protection and Safety, provide reasoning why open space fuel reduction is not an efficient use of resources. The proposed project’s structures will be hardened, as detailed in the Fire Protection Plan (FPP) provided I Appendix P1. Existing homes along the proposed project’s borders face a wildfire risk today. With or without the proposed project, these homes are located in a wildland urban interface and home owners are encouraged to retrofit their homes to be better suited for their potential wildfire and airborne ember exposure. With the proposed project, fuels on the proposed project are converted to ignition resistant landscapes, 100 feet of FMZ is provided at the perimeter of the proposed project, adjacent to existing homes, and

more fire response resources are available in the case of an ignition.

**I157-19:** This comment states the proposed project's evacuation plan is simplistic and lacks detail, and provides a quote from the plan regarding shelter-in-place protocol. The evacuation plan provided for the proposed project is a community specific plan intended to raise resident awareness and preparedness. There is currently no CEQA requirement or policy, regulation, or code requiring a proposed project to provide an evacuation plan, and therefore, there are no standards or guidelines regarding evacuation plan content. The proposed project's Wildland Fire Evacuation Plan is meant to inform future residents of the potential actions that are available and what they may be directed to do during a wildfire emergency. Please refer to the Thematic Response – Evacuation for more details regarding evacuation planning and implementation in Santee and San Diego County.

- 1157-20 However, the document does not “carefully” plan evacuations for:
- Various ignition points
  - Multiple weather condition scenarios
  - Onshore versus offshore wind-driven fires
  - Periods when school buildings are occupied during the day or after hours by the community
  - AM and PM commute hours and traffic gridlock
  - Evacuation phases for different portions of the project
  - Evacuation phases for different portions of the established WUI offsite
  - Multiple simultaneous incidents throughout Southern California
  - Cluster burns of structures
  - Residents “in the direct path of a hazard.”
  - Specific safety zones and feasibility of specific escape routes to these zones
  - Specific “pre-designated temporary refuge areas”
- 1157-32 The Evacuation Plan document is a plan in name only. It is a “plan” without a plan in that it only offers very general suggestions on how to manage home evacuations from the project site and ignores the established WUI. As such, it emanates a false sense of security with confusing generalities in regard to critical decisions that must be made by public safety officials and the public itself on whether to evacuate or to shelter-in-place.
- 1157-33 The RDEIR does not consider the feasibility of implementing the FPP or the Evacuation Plan in the context of changing climate conditions with increased severity of wildfire threat to the project site.
- 1157-34 As a current noteworthy global example of this, for the first time ever, on June 19, 2020, a triple digit temperature was recorded inside the Arctic Circle. “The Arctic is ‘on Fire,’” and suffering from an extended heat wave where temperatures have averaged 12.4° F above normal since January.<sup>3</sup> Siberia has seen massive fires annually since 2016. This Arctic extreme is just another recent example of the increasing planetary energy imbalance that will drive fire behavior globally to greater intensities.

<sup>3</sup> <https://learningenglish.voanews.com/a/the-arctic-is-on-fire-record-heat-alarms-scientists/5475940.html>  
<https://www.vox.com/2020/6/23/21300279/arctic-siberia-temperature-heat-wave-record-russia-fire-climate-change>

**I157-20:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for various ignition points. Please refer to response to comment I157-9 regarding evacuation plans, their preparation requirements, and the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Specific ignition point analysis scenarios are best evaluated by emergency management agencies who would manage and control evacuations.

**I157-21:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for multiple weather condition scenarios. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, and the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. The evacuation approach implemented in Santee and San Diego County is applicable regardless of the weather condition variables.

**I157-22:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for onshore versus offshore wind-driven fires. Please refer to response to comment I157-19 regarding evacuation

plans, their preparation requirements, the intent of the proposed project's Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. It is unlikely that an on-shore fire condition would result in mass evacuations due to the lower wind speeds, higher humidity, and higher plant moisture under such conditions. However, the evacuation approach implemented in Santee and San Diego County is applicable to both on-shore and off-shore conditions.

**I157-23:** This comment states the proposed project's evacuation plan does not "carefully" plan evacuations for periods when school buildings are occupied during the day or after hours by the community. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project's Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation, including for schools, in Santee and San Diego County.

**I157-24:** This comment states the proposed project's evacuation plan does not "carefully" plan evacuations for AM and PM commute hours and traffic gridlock. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project's Wildland Fire Evacuation Plan (Appendix P2).

Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Traffic can impact evacuation timeframes. However, controlling downstream intersections would be a primary focus for agencies managing the evacuation and traffic is moved as needed to effectuate evacuations.

**I157-25:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for evacuation phases for different portions of the proposed project. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Phased evacuations have become an integral component of Santee and San Diego County evacuation procedures, which has been facilitated by technological advances that enable smaller area notifications.

**I157-26:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for evacuation phases for different portions of the established WUI off site. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2).

Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Phased evacuations have become an integral component of Santee and San Diego County evacuation procedures, which has been facilitated by technological advances that enable smaller area notifications.

**I157-27:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for multiple simultaneous incidents throughout Southern California. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. San Diego County has significant wildfire response resources including County Fire Authority, CAL FIRE, Fire Departments and Fire Districts, USFS, and U.S. Military, amongst others. In addition, automatic and mutual aid agreements are in place that would allow the seamless transfer of resources from out of the county and out of the state, when needed. San Diego County has significant experience with large evacuations and the technological and other resources to successfully implement them, as demonstrated numerous times since 2003.



- I157-28:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for cluster burns of structures. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Please refer to response to comment I157-11 regarding cluster burns.
- I157-29:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for residents “in the direct path of a hazard.” Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County.
- I157-30:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for specific safety zones and feasibility of specific escape routes to these zones. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer

also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Safety Zones and escape routes are established by the on-scene fire fighters, not by a pre-developed, project-specific evacuation plan. The Evacuation plan presents these topics since there are opportunities on site for fire fighters to establish these zones and routes, but would be done so during a wildfire and based on that wildfire’s specific attributes.

**I157-31:** This comment states the proposed project’s evacuation plan does not “carefully” plan evacuations for specific “pre-designated temporary refuge areas.” Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, the intent of the proposed project’s Wildland Fire Evacuation Plan (Appendix P2). Refer also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County. Temporary refuge areas occur throughout the proposed project including within protected residents, the village center, and the school.

**I157-32:** This comment states that the proposed project’s Wildland Fire Evacuation Plan (Appendix P2) offers only general recommendations on managing home evacuations from the project site and ignores the established WUI. Please refer to response to comment I157-19 regarding evacuation plans, their preparation requirements, and the intent of the proposed project’s Wildland Fire Evacuation Plan. Refer

also to Thematic Response – Evacuation for details on evacuation planning and implementation in Santee and San Diego County.

**I157-33:** This comment states the Draft EIR does not consider the feasibility of implementing the FPP or the Evacuation Plan in the context of changing climate conditions. The FPP fire environment analysis is based on a worst-case condition using fire behavior inputs from extreme fire events. It is speculative to assume climate change will have a significant impact on fire behavior in Southern California, specifically given recent research that indicates climate change impacts will be primarily realized in higher elevations. The comment states that climate change will greatly increase the potential for wildfires, but new research has shown that there will not be as significant of an impact on Southern California shrublands than is anticipated in the coniferous forests of the Sierra Nevada and Northern California. Indeed, research demonstrates that drier conditions in California's forests will certainly increase potential for large, severe fires there; in Southern California shrublands, however, the impact will be significantly less, owing to the fact that region already experiences a severe annual drought. Instead, Southern California's increasing population will make it more likely that ignitions will occur, which could potentially cause large areas of chaparral to type-convert into grasslands.

**I157-34:** This comment provides an example of climate change. The provided example of higher temperatures in arctic and Siberian areas further supports recent research referenced in response to comment I157-33 regarding where climate change is expected by some researchers to have the largest impact.

1157-35  
1157-36

Of more specific relationship to the Fanita Ranch project site, it is important to understand that San Diego County is the location for five of the state's 20 deadliest wildfires. The Cedar Fire that swept over Fanita Ranch in 2003 ranks the fifth deadliest, killing 15.<sup>4</sup> The Cedar Fire destroyed 2,820 structures and ranks the 4<sup>th</sup> most destructive.<sup>5</sup> The Cedar Fire burned 273,246 acres. It was the largest in California history until the record was broken in 2017 by the Thomas Fire in Santa Barbara and Ventura counties and broken again in 2018 by the Mendocino Complex. Fifteen of the state's 20 largest fires have occurred since the ignition of the Cedar Fire.<sup>6</sup> These sobering facts demand that extreme caution be exercised by land use authorities and public officials when considering whether to permit additional development in wildland urban interface zones.

In conclusion, it is my expert opinion the Revised DEIR has failed to disclose, avoid and mitigate the significant adverse wildfire public safety impacts associated with the proposed Fanita Ranch development project.

Sincerely,



David McNeil

Retired. Community Development Planner, Douglas County, NV. Firefighter, CDF and USDA-Forest Service. Biomass-to-Energy Fuels Management Coordinator, Nevada Governor's Office of Energy.

Attachments:

- Top 20 Deadliest California Wildfires
- Top 20 Most Destructive California Wildfires
- Top 20 Largest California Wildfires
- San Diego Gas & Electric Company (SDG&E) Public Safety Power Shutoff Report

<sup>4</sup> [https://www.fire.ca.gov/media/5512/top20\\_deadliest.pdf](https://www.fire.ca.gov/media/5512/top20_deadliest.pdf)

<sup>5</sup> [https://www.fire.ca.gov/media/5511/top20\\_destruction.pdf](https://www.fire.ca.gov/media/5511/top20_destruction.pdf)

<sup>6</sup> [https://www.fire.ca.gov/media/5510/top20\\_acres.pdf](https://www.fire.ca.gov/media/5510/top20_acres.pdf)

**1157-35:** This comment states that 5 of the state's 20 deadliest wildfires occurred in San Diego County and that the largest fires have occurred more recently than the Cedar Fire, then recommends extreme caution be exercised when considering whether to permit additional development in wildland urban interface zones. The proposed project has been provided substantial levels of analysis, provided customized fire protection features along with Santee and California mandated features, and has been very cautiously evaluated by professional fire protection planning consultants, as well as the SFD, and found to be in compliance with the restrictive requirements for building in wildland urban interface areas and appropriately protected given the site's studied fire environment.

**1157-36:** This comment concludes that the EIR has failed to disclose, avoid, and mitigate significant adverse wildfire public safety impacts associated with the proposed project. No evidence was provided to support this claim. The fire protection planning, design, features, and ongoing maintenance and monitoring planned for the proposed project would provide a fire-safe community. The EIR's conclusion that there would be no significant wildfire impacts is supported by substantial evidence in the record, particularly the Fire Protection Plan and Wildland Fire Evacuation Plan provided in Appendices P1 and P2, respectively.

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## Comment Letter I158: Joe Meza, July 13, 2020

I158

**I158-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Joe Meza <user@votervoice.net>  
**Sent:** Monday, July 13, 2020 4:58 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I158-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Joe Meza  
7827 Rancho Fanita Dr Unit B  
Santee, CA 92071  
jmeza1@cox.net

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## Comment Letter I159: Robin Milbourne, July 13, 2020

**I159**

**I159-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Robin Milbourne <rmathome1@gmail.com>  
**Sent:** Monday, July 13, 2020 1:12 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

We are really excited to have the opportunity to for a project like Fanita Ranch. We are looking forward to leaning more about the 55 and old community.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I159-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Robin Milbourne  
8759 Boulder Ln  
Santee, CA 92071  
rmathome1@gmail.com

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## Comment Letter I160: Carly Morales, July 13, 2020

**I160**

**I160-1:** This comment states the commenter's general opposition to the proposed project that the destruction of open land, increased traffic congestion, and construction impacts would ruin the things she enjoys most living in the City of Santee.

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**From:** carlyemorales@gmail.com  
**Sent:** Monday, July 13, 2020 4:50 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch EIR

I160-1

I am writing to you today in opposition of the Fanita Ranch development, which has already been rejected by your voters. Destroying the open land in this proposed area and adding significant traffic congestion to Santee, not to mention the 15-year-long impacts of construction, would ruin the things I enjoy most living in Santee. Please listen carefully to the thoughtful responses from your constituents who diligently dedicated hours to reviewing the EIR and reject this deeply flawed project.

Thank you.  
Carly Morales

Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, fully analyzes potential impacts to sensitive plants, wildlife, and vegetation communities. Based on the opinions of the biological experts who prepared the analysis, the EIR concludes

impacts to sensitive plants, wildlife, and vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

Construction impacts are discussed throughout the EIR specific to each applicable CEQA threshold of significance and mitigation measures are identified to reduce those impacts to the extent feasible in accordance with the CEQA Guidelines Section 15126.4. Specifically, Section 4.2, Air Quality, Section 4.3, Biological Resources, Section 4.4, Cultural and Tribal Cultural Resources, Section 4.6, Geology, Soils, and Paleontological Resources, Section 4.7, Greenhouse Gas Emissions, Section 4.12, Noise, and Section 4.16, Transportation, include mitigation measures that address the construction impacts of the proposed project, although not all would reduce impacts to below a level of significance. This issue is adequately addressed in the EIR.

## Comment Letter I161: Dan Murphy, July 13, 2020

**I161**

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**From:** Dan Murphy <dmurphy@lpsi.com>  
**Sent:** Monday, July 13, 2020 8:57 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I161-1 I am in support of the project. My only comment is that it was indicated that the 52 will be widened after construction; I recommend to do prior, as there is going to be such an increase to traffic on the 52, with earth movers etc, to expect the amount of increase under the current circumstances, is not practical..

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

I161-2 The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Dan Murphy  
 1975 Altozano Dr  
 El Cajon, CA 92020  
 dmurphy@lpsi.com

**I161-1:** This comment states the commenter's support for the project and that the EIR indicates SR-52 would be widened after construction and recommends it be done prior as there would be such an increase in traffic from construction vehicles. The Transportation Impact Analysis (Appendix N) states that the SR-52 improvements would occur prior to occupancy of the first equivalent residential unit. This statement has been added to the Final EIR Transportation Section, Section 4.16.5.2, Threshold 1: Circulation System Performance, for clarification purposes, and do not change the calculations, analysis or conclusions identified in the EIR. Therefore, this issue is adequately addressed in the EIR.

**I161-2:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I162: Carol, July 13, 2020

**I162**

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**From:** carol & stephen <dog4doll@yahoo.com>  
**Sent:** Monday, July 13, 2020 8:25 AM  
**To:** Chris Jacobs  
**Subject:** FANITA RANCH-NO!!

- I am writing to express my opinion on the Fanita Ranch housing. I personally feel it would be a HUGE mistake.
- 1 I keep hearing from the Fanita Ranch side how they plan to expand the 52 and how that area up there will be developed so beautifully and have park land as well as many other benefits for everyone.
- 2 I see it as the downfall of a city. We already pay some of the highest water rates around. How will that be impacted? We are always told that electricity is an issue and have had rolling black/brown outs when high electrical usage. How would either water or electricity be handled with so many more houses ON TOP OF the new houses ALREADY being built? Our internet service through much of SANTEE is awful. If you end up using a service like cox that puts all neighboring users on the same usage those people are going to be screwed.
- 3 Now let's get to the traffic portion of this. There is absolutely NO WAY to add enough lanes to the 52 to not make this more of a traffic nightmare than it already is. The multitude of on ramps while trying to come in to Santee make the traffic impossible. Add in the bottle neck at the bottom of the hill and it's just down right ridiculous. Even if you added one more lane to that bottle neck area. That would maybe be enough to clear up some of the CURRENT issues with back up but no way would that be enough to handle the enormous amount of more traffic. We already have so many new housing developments. As soon as those fill up and everyone gets back to driving regularly we will see even more of a nightmare. And that's WITHOUT Fanita Ranch housing. Adding lanes to the 52 leaving Santee will only help so much. Much of the back up on the 52 leaving Santee is from people merging to get on the 15, 163, or the 805.
- 4 There is also an issue with that many more cars on our city streets. We already have people running red lights like crazy in Santee. Part of that I'm sure is because our lights are not synchronized. I can count on one hand how many times I've driven down Mission Gorge and gotten through more than 2 lights at a time. How are the city streets and the lights going to be updated to handle the influx of cars?
- 5 Lastly let's talk about the stores. Target, Walmart, Costco, and grocery stores are the biggest concerns I see. Obviously at the moment things aren't as bad but before the stay at home orders trying to find parking to enter these places was a challenge. Costco is crazy every single day. Even now! Vons parking lot is no where near big enough. It gets filled now without the current homes being built let alone even more.
- Santee seems to be trying to cram in housing in every available corner and crevice they can find. There won't be any chance to add needed roads or additional big business stores to handle all this new traffic.
- There is no way that Fanita Ranch is good for Santee!!

Carol  
 A long time resident

[Sent from Yahoo Mail for iPhone](#)

1

**I162-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I162-2:** This comment asks how water rates will be impacted. This comment also asks how water, electricity, and internet will be handled with additional houses built. Section 4.17, Utilities and Service Systems, discusses the existing utilities and service systems (water, sewer, stormwater drainage, electricity, natural gas, telecommunications, and solid waste) on the project site and evaluates changes to the physical environment that may result from the expansion of utilities and service systems under the proposed project. Padre Dam Municipal Water District would provide water and sewer service to the proposed project and has the authority to determine utility rates. Section 4.17 is based on the following studies prepared for Padre Dam Municipal Water District by Michael Baker International (2020): Fanita Ranch Development Water Service Study (Appendix O1), Fanita Ranch Development Sewer Service Study (Appendix O2), and Fanita Ranch Water Supply Assessment (Appendix O3) approved by Padre Dam Municipal Water District on February 19, 2020. In addition, Dexter Wilson

Engineering, Inc. (2020), prepared the Fanita Ranch Private Residential Water Systems Memorandum (Appendix O4). The section also states that San Diego Gas & Electric Company would provide electricity and natural gas to the project site. In conjunction with electricity and natural gas facilities, telephone, cable television, and internet facilities would also be constructed in joint utility trenches. Through the proposed project approval process, the applicant would coordinate with the appropriate service providers and City of Santee Department of Development Services Engineering staff to properly connect to existing facilities. The sections conclude that mitigation would be incorporated to reduce potentially significant impacts, though not to a less than significant level. These issues are adequately addressed in the EIR.

- I162-3:** This comment provides an opinion that there is no way to mitigate for the traffic impacts as a result of the proposed project. Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The level of service analysis established baseline (existing)



conditions based on 2018 traffic counts and evaluated the proposed project's traffic contribution compared to the baseline condition. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not to below a level of significance. This issue is adequately addressed in the EIR.

**I162-4:** This comment asks how the City streets and traffic lights will be updated to handle the additional cars. Section 4.16.5.1, Threshold 1: Circulation System Performance, in Section 4.16 discusses the installation of Adaptive Traffic Signal Control, or “smart” signals, to handle additional traffic along Mission Gorge Road between Fanita Drive and Town Center Parkway by communicating with each other and dynamically adjusting signal timings, memorizing traffic patterns, improving traffic flow, and reducing vehicle stops. This system is memorialized under Mitigation Measure TRA-16. This issue is adequately addressed in the EIR.

**I162-5:** This comment states that existing off-site stores do not have adequate parking. This issue is not related to the environmental impacts of the proposed project. It does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I163: Autumn Nyby, July 13, 2020

**I163**

**I163-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Autumn Nyby <andnyby@gmail.com>  
**Sent:** Monday, July 13, 2020 2:05 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I163-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Autumn Nyby  
10432 Susie Pl  
Santee, CA 92071  
andnyby@gmail.com

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## Comment Letter I164: David Nyby, July 13, 2020

**I164**

**I164-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** David Nyby <david.nyby@gmail.com>  
**Sent:** Monday, July 13, 2020 1:30 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I164-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

David Nyby  
10432 Susie Pl  
Santee, CA 92071  
david.nyby@gmail.com

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## Comment Letter I165: John Olsen, July 13, 2020

I165

**I165-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** john olsen <johnolsen.santee@gmail.com>  
**Sent:** Monday, July 13, 2020 1:20 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I support this project and the improvements to SR52

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I165-1

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

john olsen  
10044 Lake Canyon Ct  
Santee, CA 92071  
johnolsen.santee@gmail.com

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## Comment Letter I166: Marty Orgel, July 13, 2020

**I166**

**I166-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Marty Orgel <marty@orgelrealty.com>  
**Sent:** Monday, July 13, 2020 7:54 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I166-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Marty Orgel  
8533 Brian Pl  
Santee, CA 92071  
marty@orgelrealty.com

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## Comment Letter I167: Toni Patrick, July 13, 2020

**I167**

**I167-1:** This comment states the commenter's opposition to the proposed project due to impacts to sensitive species, including least Bell's vireo (*Vireo bellii pusillus*), Quino checkerspot butterfly (*Euphydryas editha quino*), and San Diego fairy shrimp (*Branchinecta sandiegonensis*), and impacts to traffic.

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**From:** Toni Patrick <mdcacsdc@yahoo.com>  
**Sent:** Monday, July 13, 2020 9:52 AM  
**To:** Chris Jacobs  
**Subject:** HomeFed Corporation Development

To: Chris Jacob's

1167-1 Please say no to the HomeFed Corporation development proposed in Santee. From what I read, it imposes endangerment to many species, including already endangered ones like the Least Bell's Vireo song bird, the Quino Checkerspot Butterflies, and San Diego Fairy Shrimp. Also, from what I read, it will add to the horrible traffic problems.  
Sincerely,  
Toni Patrick

[Sent from Yahoo Mail on Android](#)

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, in the EIR fully analyze potential impacts to sensitive wildlife species, including least Bell's vireo, Quino checkerspot butterfly, and San Diego fairy shrimp. Mitigation measures have been identified to reduce impacts to these species. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that impacts to sensitive wildlife species and critical habitat for these species would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

Section 4.16, Transportation, analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle,

and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

## Comment Letter I168: Michele Perchez, July 13, 2020

I168

**From:** michele.perchez <mperchez5@gmail.com>  
**Sent:** Monday, July 13, 2020 12:03 PM  
**To:** Marlene Best; John Minto; Stephen Houlahan; Laura Koval; Ronn Hall; Rob McNelis; Chris Jacobs  
**Subject:** RE: Fanita Ranch Project comments and attached DEIR comments/questions  
**Attachments:** BIOL\_RESOURCES\_DEIR FR.docx; NOISE FR DEIR.docx

I168-1  
 Chris Jacobs, please send me a reply to know that you have received my feedback to be recorded into the public record. I have already sent a response related to noise and did not receive a notice that you have received it. I am sending it again. Thank you.  
 There are two attachments with questions, one in relation to Noise, one in relation to Biological Resources. I hold a Bachelor and Master Degree in Biology.

I168-2  
 To say I have doubts about the fulfillment of the parts of this project that involve wildlife especially is an understatement. I cannot emphasize enough, the substantial commitment of the right people, doing the right things, at the right moment and with proper oversight by state and federal agencies, including coordination with those agencies, that will be needed to truly execute this undertaking to the degree that it requires. The "taking" of all entities within a highly endemic (nowhere else in the world folks!) biological ecosystem is a sacred covenant. The City is ensuring it's stewardship commitment for the rest of time—it should not ever through up it's hands and say "We have no control over what happens", like I have seen it do in relation to other city matters. YOU are making this commitment! I think the City should strongly reconsider this project, and, choose the no development alternative as the most conservative choice, given the history of this project, when time and time again, citizens say NO to development at this site.

**Educational resources for your consideration:**

Related to Vernal Pools/Basins which support San Diego Fairy Shrimp, Western Spadefoot toads and a diversity of cute plants...

A. Per Christina Schaeffer, The Challenges of Vernal Pool Restoration in Southern California presentation

I168-3  
[https://www.aswm.org/pdf/lib/restoration\\_webinar/vernal\\_pool\\_restoration\\_042115.pdf](https://www.aswm.org/pdf/lib/restoration_webinar/vernal_pool_restoration_042115.pdf) (STARTS on p. 88), the text below has my bolding and italics, as the table format did not translate well upon cutting and pasting

"Schaefer Top Recommendations for restoring vernal pools in the Southern California Causes of Failure Recommendations

Selected Measures 1. Overall reduction in viable and functioning vernal pool ecosystems (San Diego County loss about 97%) Conserve and preserve vernal pool complexes before allowing impacts that require mitigation/restoration *Vernal pool restoration science is too young to guarantee comprehensive improvement of ecosystem functions in perpetuity, specifically given climate change and the California drought. There are no comprehensive studies that show that vernal pool restoration is successful in the long term, but some studies show their failures. Provide for comprehensive regional guidelines (e.g., NCCP, HCP) and ordinances for vernal pool conservation.*

I168-1: This comment provides an introduction to the comment letter asking for verification of receipt of the commenter's noise and biological resources comments. The City received the commenter's comments on noise in a letter dated July 8, 2020. This comment letter is numbered I25. Please refer to responses to comments I25-1 through I25-16 addressing the commenter's noise comments. The commenter's biological resources comments are addressed in responses to comment I168-2 through I168-35.

I168-2: The comment expresses doubts about the implementation of the proposed project and the commitments required, including coordination with wildlife agencies needed to execute the project. The comment states that the City is ensuring its stewardship commitment.

As required by CEQA, a Mitigation Monitoring and Reporting Program (MMRP) will be prepared and would be adopted by the City if the Final EIR is certified and the project approved. The MMRP would track the progress of each of the mitigation requirements in the EIR to ensure they are implemented as required, including the establishment of the Habitat Preserve and a Preserve Management Plan (Mitigation Measure BIO-1). For clarification, while the City would approve the

proposed project, the manager of the Habitat Preserve would be a third party.

This comment also states that the City should reconsider this project and choose the no development alternative as the most conservative choice. This comment expresses a preference for this alternative but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- I168-3:** This comment provides background information on recommendations for restoring vernal pools in Southern California, which includes conserving and preserving vernal pool complexes before allowing impacts that require mitigation/restoration. The MMRP would track the progress of the mitigation requirements in the EIR to ensure they are implemented as required, including Mitigation Measure BIO-12, Vernal Pool Mitigation Plan. As stated in Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D), implementation of the mitigation plan, including site preparation, grading, and installation, will commence prior to, or concurrent with, the initiation of impacts for the proposed project (refer to Section 5.5 of the Vernal Pool Mitigation Plan). Success criteria and performance standards are outlined in Vernal Pool Mitigation Plan Section 8.4, which includes adaptive management strategies if the restoration does not meet

the targeted goals outlined in Section 8.1 through 8.3 of the Vernal Pool Mitigation Plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

- 1168-4 2. Failure of vernal pool restoration due to inadequate baseline conditions If you must create pools to mitigate unavoidable impacts, do so only where pools once (historically) existed. Collect adequate baseline data by experienced vernal pool restoration practitioners and biologists. **Vernal pools require functioning hydrology, and with it impermeable soils. It has been shown that artificially created impermeable soil layers do not work (bentonite has different physical characteristics than the extant clay layers and hard pans that characterize SoCal vernal pools). Develop hydrological models for vernal pool conditions. Collect baseline data within the vernal pool complex (or watershed), including botanical surveys, faunal surveys (incl. fairy shrimp sampling), and soil tests.**
- 1168-5 3. Vulnerability of restored vernal pools to edge effects, fragmentation, and other threats due to their position in the landscape Avoid creating postage stamp vernal pools that lack sufficient/appropriate watershed, buffers, and landscape context Vernal pool functions require an appropriate watershed to allow for reliable filling of pools. **Vernal pool ecosystems are sensitive to edge effects, including trampling, invasive species introduction, pollution, predation, and lack of pollinator access.**
- 1168-6 4 Failures due to inadequate experience by restoration contractor Only use experienced contractors with documented track record of successful vernal pool restoration. This is not necessarily the lowest bid. **Vernal pool restoration requires micro-topographic grading to create functioning vernal pool basins and mima mounds without penetrating the hard/clay pan. This requires years of specialized experience. Vernal pools are unique ecosystems and the contractor must have an understanding of the baseline physical and ecological conditions. There is a common misunderstanding that a low bid saves tax payer money; however, in the end, a low bid may actually be more expensive down the line due to changes orders, remediation costs, or project failure.**
- 1168-7 5. Failures of successfully installed vernal pool restoration due to lack of continued monitoring and management 5. Set up management funds. Avoid disturbance through monitoring; use programmatic reference sites and consistent monitoring protocols and metrics geared toward ecosystem function rather than singling out one organism over another, and protect restored pools through long-term management. **Meaningful monitoring is important to show ecosystem functions of the entire system, not just plants. Use statistically rigorous monitoring protocols, but avoid over-monitoring (killing with good intentions). Longterm monitoring is important to inform adaptive management and buffer from climate change effects. Vernal pools are susceptible to invasive species that accumulate phytomass, which prevent proper hydrological function and result in species extirpation. Calculate management funds/endowments using experienced personnel that understand what it takes. Consider managed grazing."**
- 1168-8 B. Steinberg, Peter D. 2002. *Quercus agrifolia*. In: Fire Effects Information System, [Online]. U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station, Fire Sciences Laboratory (Producer). Available: <https://www.fs.fed.us/database/feis/plants/tree/queagr/all.html> [2020, July 13].
- Coast live oak communities support a number of bird species including the federally endangered least Bell's vireo—this is a species of interest in the DEIR.
- In the Sepulveda Wildlife Reserve of Los Angeles County, nursery seedlings were planted for slope stabilization and wildlife habitat improvement. Survival of these seedlings was between 40 and 75% over 3 years —DEIR predicts 85% success rate at 3 yrs.

**1168-4:** This comment provides a recommendation for restoring vernal pools in Southern California, stating that “if you must create pools to mitigate unavoidable impacts, do so only where pools once existed” and to “collect adequate baseline data by experienced vernal pool restoration practitioners and biologists.” The comment also notes that certain soils are not suitable for vernal pool restoration. Mitigation Measure BIO-12, Vernal Pool Mitigation Plan, requires a performance standard of “a 4:1 ratio, including preservation and management of existing pools, rehabilitation/enhancement of existing features within the Habitat Preserve, and creation of new features” and that “constructed pools (i.e., artificial features and street ruts) shall be mitigated through rehabilitation/enhancement and/or creation at a 3:1 or 2:1 ratio.” As stated in Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D to the EIR), the results of the baseline condition surveys, which are a recommendation in the comment, indicated that the Habitat Preserve is suitable for on-site mitigation for vernal pools and their surrounding upland watershed as the mitigation area includes existing vernal pool complexes (refer to Section 4.1 of the Vernal Pool Mitigation Plan).

**1168-5:** This comment provides a recommendation for restoring vernal pools in Southern California, stating such restored pools should “avoid creating postage stamp vernal pools that lack sufficient/appropriate watershed, buffers, and



landscape context.” As stated in Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D), the creation and/or restoration of vernal pools would be implemented in the Habitat Preserve. Not only would these pools share climate, soils, and many other abiotic characteristics with the vernal pools impacted by the proposed project (refer to Section 4.1 of the Vernal Pool Mitigation Plan), but the EIR includes measures to reduce edge effects into the Habitat Preserve including Land Use Adjacency Guidelines (Mitigation Measure BIO-6), Stormwater Pollution Prevention Plan (Mitigation Measure BIO-7), Habitat Preserve Protection (Mitigation Measure BIO-9), and Weed Control Treatments Mitigation Measure (BIO-10). Thus, based on the opinions of the technical experts who prepared the analysis, the proposed project would avoid indirect impacts to recreated vernal pools within the Habitat Preserve as the comment suggests.

- I168-6:** This comment provides a recommendation for restoring vernal pools in Southern California, stating that such efforts should only use experienced contractors with documented track record of successful vernal pool restoration. As stated in Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D), a biologist knowledgeable of vernal pool species biology and ecology shall trail all contractors and construction personnel on the biological

resources associated with this project (refer to Section 5.3 of the Vernal Pool Mitigation Plan). Additionally, HomeFed is responsible for hiring a qualified landscape maintenance contractor to carry out all maintenance work (refer to Section 6.2 of the Vernal Pool Mitigation Plan). The MMRP would track the progress of the mitigation requirements in the EIR to ensure they are implemented as required, including Mitigation Measure BIO-12, Vernal Pool Mitigation Plan, and Mitigation Measure BIO-8, Approved Biologist.

- I168-7:** This comment provides a recommendation for restoring vernal pools in Southern California by avoiding disturbance through monitoring and using consistent monitoring protocols geared toward ecosystem function. As stated in Appendix R, Vernal Pool Mitigation Plan, of the Biological Resources Technical Report (Appendix D), monitoring methods are described as part of the long-term biological monitoring program over 7 years (refer to Section 7 of the Vernal Pool Mitigation Plan). The MMRP would track the progress of the mitigation requirements in the EIR to ensure they are implemented as required, including Mitigation Measure BIO-12, Vernal Pool Mitigation Plan, and Mitigation Measure BIO-8, Approved Biologist. Finally, Mitigation Measure BIO-1, Preserve Management Plan, requires that the “preservation of on-site open space requires recordation of a Habitat Preserve conservation easement and in-

perpetuity management by the Preserve Manager in accordance with a Preserve Management Plan, which would be funded by an endowment or other acceptable permanent funding mechanism.”

- I168-8:** This comment states that the survival of seedlings for a study in the Sepulveda Wildlife Reserve of Los Angeles County was between 40 and 75 percent over 3 years, and the comment states that the EIR predicts 85 percent success rate at 3 years.

The comment cites one research study and the study’s survivorship of coast live oak seedlings and states that the EIR predicts a higher success rate than the study cited. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, Table 10 in Appendix S, Wetland Mitigation Plan, of the Biological Resources Technical Report (Appendix D) lists performance standards for coast live oak woodland establishment and enhancement area. As stated in Section 5.4.2 of the Wetland Mitigation Plan, the performance standards were based on an evaluation of the existing oak woodland. The performance standards included in the Wetland Mitigation Plan, must be achieved and will be tracked through the MMRP as part of the Wetlands Mitigation Plan (Mitigation Measure BIO-12). Only when the project has met the final

performance criteria for the site will the applicant notify the resource agencies upon submitting the last annual report and request written approval of the compliance with this mitigation measure. If this level of success is not achieved, measures must be taken to improve performance in compliance with the MMRP. Successful completion of the Wetlands Mitigation Plan will ensure impacts are reduced to less than significant as determined in the EIR.



RE: Fanita Ranch Development application DEIR

My commentary and questions are in relation to the Biological Resources component of the DEIR for the Fanita Ranch Project. I have read Appendix D, the Biological Technological Report, and have based my questions and observations on that reading.

1168-9 The developers, HomeFed, are hoping that the permanent impacts to 900+ acres of endemic, "high quality" (DEIR verbiage) habitat will be offset with preservation of 1600+ acres most of which is a somewhat degraded, but hoping-to-be restored habitat. The main bulk of said Habitat Preserve (~900 acres) by DEIR description consists of a 1 mile by 1.3 mile area. I bet most residents do not realize what a tiny area they will get to enjoy in perpetuity (or unless the money, and/or political will runs out). We should be so grateful, yes?

The following are listed as impacts to the planned development area in relation to the biology:

**Permanent direct impacts** due to loss of habitat, resulting in the displacement and/or killing of flora and fauna species due to construction related activities.

1168-10 **Permanent indirect impacts** due to the development are increased and unmitigated noise, light pollution, destruction of flora and fauna by pets and exotic introduced invasive species (both causing further degradation of spared habitat), road kill of fauna, and alteration of fire regimes.

**Temporary indirect impacts** related to construction are noise, vibration, lighting, human activity, and water quality.

I am sure us lucky residents will be more than happy to bear those impacts in perpetuity. In the Executive Summary of the DEIR (pages 4-6 of PDF), there are many options for the site, *including no development with the area maintained as a preserve. Most residents would more happily agree to that option alone—it's not too late to hear the diversity of voices of the citizens and to act in their best interest! (Or, will the council prove, like they have, time and time again, that they only listen to a select few residents?)*

Questions:

1168-11 **1.3.1 Mobility** If losses result from the wildlife crossing, how will this be determined, and what is the threshold for action to alleviate the problem? What actions are to be implemented to stop the loss? Who will notice and how soon, in order to properly address the problem? Who is responsible for fixing the problem and who pays for it?

Please detail the plan to "encourage" fewer vehicle trips by biking, walking, shuttle so that it happens to a significant degree.

**1.3.1 Habitat Preserve** What specific actions will shield light from the Preserve besides the on/off buttons at the neighborhood walkways?

1168-12 DEIR states "maintained and managed by HOA or Habitat Preserve Management entity (unless otherwise specified)" Could the HOA really be in charge of the Preserve? What problems do you foresee if this happens?

Could you explain how destroying habitat at this location can really "generally increase the integrity of ecosystems across the area"?

1168-13 Manufactured slopes on the exterior of development footprint will be revegetated to blend. How is it expected that an area that starts off as highly disturbed is going to be properly maintained once revegetated to achieve maintenance of habitat value?

1168-14 **3.2.12 Hermes Copper** Please explain why the County Guidelines were used for surveying this species (which is different than for surveying of Quino Checkerspot)?

1168-15 **4.5.3.1 (reptiles)** Please include explanation of why there are no estimates given for the following (while they are for other species): San Diego Whiptail, Red Diamondback Rattlesnake, Two-lined Gartersnake

**1168-9:** This comment states that permanent impacts will be offset with preservation and restored habitat, and the Habitat Preserve includes a 900-acre area. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**1168-10:** This comment restates the definition of different impacts to the development area in relation to biological resources. The comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR.

This comment also expresses a preference for the No Project Alternative but does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**1168-11:** This comment asks how losses from wildlife crossing will be determined, what the threshold is for action to alleviate the problem, what actions would be implemented to stop such losses, who will notice and address such a problem, and who would be responsible for fixing the problem.

Per applicable criteria in Appendix G of the CEQA Guidelines, the proposed project's impacts to wildlife movement were evaluated in Section 4.3.5.4 under

Threshold 4 (interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites). The EIR determined that avian species, in particular, should have no trouble accessing the area due to the nearby large off-site open space areas, only needing to cross the Fanita Parkway and Cuyamaca Street extensions. Mitigation Measure BIO-20 (Wildlife Protection) incorporates features that will allow wildlife to cross the roadways more safely, including a 25 mile-per-hour speed limit, street signs, speed bumps, and other traffic-calming devices. Mitigation Measure BIO-22 (Wildlife Corridors) includes a measure (see No. 6) that safety lighting for Streets “V” and “W” will be button started with a timer shut-off delay so that lighting is not on at night except for emergency purposes or pedestrian safety.

Wildlife crossing mitigation is implemented prior to and during construction of the project. The project applicant would implement Mitigation Measure BIO-20 for protecting wildlife species.

This comment asks for a detailed plan to encourage fewer vehicle trips by biking, walking, or shuttle. As stated in Biological Resources Technical Report Section 1.3.1, mobility on the project area would focus on reducing the number and length of vehicle trips and providing

alternatives to fossil-fuel-powered use. This would be achieved through organizing land uses to locate services and goods close to residences and optimizing circulation systems to create direct, efficient, safe, and comfortable routes for various transportation modes.

**I168-12:** This comment asks what specific actions will shield light from the Habitat Preserve beside the on/off buttons on neighborhood walkways. As stated in the Mitigation Measure BIO-6, mitigation for potential permanent indirect impacts to vegetation communities, wildlife and jurisdictional resources shall require implementation of Land Use Adjacency Guidelines as specified in the Draft Santee MSCP or the Preserve Management Plan, including mitigation for lighting. The mitigation measure states that lighting of all developed areas adjacent to the Habitat Preserve shall be directed away from the Habitat Preserve wherever feasible and consistent with public safety as well as use low-pressure sodium lighting whenever possible. In addition, Mitigation Measure BIO-22 requires that Streets “V” and “W,” “provide safety lighting that shall be button started with a timer shut-off delay such that lighting shall not permanently be on at night, but only on when needed for emergency purposes or pedestrian safety.” Other issues addressed by Mitigation Measure BIO-6 to reduce indirect impacts include drainage, noise, control of invasive species and establishment of fuel modification

zones. Other mitigation measures related to reducing indirect impacts include Stormwater Pollution Prevention Plan (Mitigation Measure BIO-7), habitat preserve protection (Mitigation Measure BIO-9), and weed control treatments (Mitigation Measure BIO-10).

This comment questions whether the HOA would be in charge of the Habitat Preserve and includes the following statement from the EIR: “maintained and managed by HOA or Habitat Preserve Management entity (unless otherwise specified).” The comment incorrectly implies that the Habitat Preserve would be maintained and managed by the HOA. The text referenced in the comment is regarding the Open Space Areas, which would apply to approximately 256 acres of open space area outside of the Habitat Preserve. The proposed Open Space land use designation would include brush management areas (Fuel Modification Zones [FMZ]) at the edge of development, slopes adjacent to streets and within the villages, trailheads, water quality basins, land for water tanks and pump stations that would be dedicated to and maintained by Padre Dam Municipal Water District, and two riparian areas in Fanita Commons. Section 3.3.1.8, Open Space, states that areas designated as Open Space would be owned, maintained and managed by HOA and would be subject to the Fire Protection Plan (FPP) (Appendix P1). As stated in Section 1.4.1 of Appendix P, On-Site



Preserve Management Plan, the Habitat Preserve will be managed by a Preserve Manager, which will be an independent third party separate from the Homeowner's Association (HOA), City, and developer. Initially, the developer will hire and fund the Preserve Manager; however, once the HOA is formed, it will gradually take over funding responsibility for the Preserve management and the Preserve Manager position. The HOA will not direct, in any way, the activities of the Preserve Manager; however, the HOA would fund the Preserve management entity.

This comment also asks to explain how destroying habitat at this location can “generally increase the integrity of ecosystems across the area.” In Section 1.3.1, subheading Parks and Open Space, in the Biological Resources Technical Report, the text states that the proposed project would implement a biological restoration and enhancement program that would offset unavoidable impacts to existing biological resources located within the development footprint and generally increase the integrity of ecological systems across the project area. Mitigation measures implemented from the project would preserve, restore, and enhance vegetation communities.

**I168-13:** This comment asks how manufactured slopes on the exterior of the development footprint would be restored and maintained once revegetated to achieve habitat value. Portions of exterior revegetated slopes would be

included within HOA-managed fuel modification zones and would not be part of the Habitat Preserve. As stated in Section 4.3.4, Method of Analysis, in the EIR, there would be temporary impacts to manufactured slopes adjacent to the Habitat Preserve that would be revegetated and restored following construction, and would be ultimately included in the on-site Habitat Preserve. Restoration would be required to comply with performance standards to ensure the revegetation efforts are successful as outlined in Mitigation Measure BIO-2. Thereafter, the manufactured slopes on the exterior of the development footprint would be maintained by the Habitat Preserve manager, which would be a funded entity to ensure ongoing management.

**I168-14:** This comment asks why the County Guidelines were used for surveys of Hermes copper butterfly and were different than the surveys conducted for Quino checkerspot butterfly. Quino checkerspot butterfly is a federally listed species and focused surveys were conducted in accordance with the USFWS protocols. Hermes copper butterfly is a federal candidate species and focused surveys were conducted in accordance with County of San Diego protocols. These species have different habitat types, status listings, and protocol survey conditions, and therefore, the surveys for Hermes copper butterfly and Quino checkerspot butterfly were

conducted separately and following the species' approved protocol survey methods.

**I168-15:** This comment states there are no estimates for the following reptile species: San Diegan tiger whiptail, red diamondback rattlesnake, and two-striped garter snake. The commenter is directed to Table 4.3-4, Special Status Wildlife Species Observed on the Project Site and Off-Site Improvement Areas, which includes observation counts for each species. No further response is required.

1168- 4.5.3.4 Why was sampling not needed in 2017 for Quino Checkerspot?  
16

1168- 5.1.1 For revegetated temporary impacts, do they become part of the Preserve immediately, or only after they have  
17 survived a certain amount of time?

1168- Table 5-3 is confusing in reference to Willow Monardella in particular. How is a data point of 1 (which is really 49  
18 individuals) related to the total individuals of 1,622? Is that how many individuals the habitat can support theoretically?

1168- Please further clarify as to why you are waiting to do pre-construction surveys on Magnolia? I realize you expect it to be  
19 of no significance as you see it is disturbed, but can you give more reasons?

1168- The fact that none of the floral species on the watch list are considered for mitigation may demonstrate a lack of  
20 commitment to conservation of those species. Please explain your rationale for this decision.

1168- 5.1.7 One of the jobs of the Preserve Manager is to monitor trail use in order to determine if actions are needed to  
21 decrease impacts. Please provide details on how this will work. Do we currently have an example for the City—perhaps  
from Walker Preserve? I would expect that data can provide a conservative estimate of anticipated usage.

1168- 5.3 Cumulative Impacts How does cumulative threshold #5, Tree Preservation apply to this project (“City enforces it’s  
22 Urban Forestry Ordinance”)?

1168- **MM BIO-2** How will the public be notified of the results of this, and any/all tracking data? Will this info be available via  
23 the City website? Do we have a good example of this already in the City, of how this is done—perhaps from Walker  
Preserve?  
It was discussed how when temporary impact mitigation fails, it will then be subsumed under permanent impact  
mitigation. What is the plan if any permanent impact mitigation fails? Do you retry, and how long? Do you mitigate  
elsewhere to make up for failures? How is this communicated to the public?

1168- **MM BIO-3** Please explain the purpose of and how the “ownership agreements and long-term management strategie”s  
24 work?

1168- **MM BIO-5** Who chooses this “replanting by City approved contractor” (does the developer suggest someone)? How is  
25 this entity ultimately chosen?  
If replanting fails, DEIR says project applicant and City decide what to do—what are the options, who pays for the costs,  
does this happen in the City or can it happen off-site too?

1168- **MM BIO-11** Who decides the schedule of survey? What is the rationale?  
26

1168- **MM BIO-18** Is there any possible developer input for choice of Biologist? If not, how is that person chosen?  
27

1168- **I.1.1** Where are the locations for the off-site mitigation? Is that/will that information be available to the public in  
28 advance?  
Will those areas be under the same guidelines as the PMP?

1168- **I.4 Implementation** How will the City make habitat stewardship a priority, when it already has so many tasks to attend  
to?  
29 Who is this City appointed Subarea Coordinator and/or Preserve Steward?  
How is the staff person that could help the Preserve Manager chosen?  
How is it not a conflict if the developer hires the Preserve Manager?

1168- If there is no cost analysis until the Preserve Manager is chosen and approved, how will you know how much HOA fees  
30 to advertise to potential home buyers?

**I168-16:** This comment asks why Quino checkerspot butterfly surveys were not required in 2017. As stated in Section 4.5.3.4, Invertebrates, in the Biological Resources Technical Report (Appendix D), the project applicant asked the USFWS if surveys should be performed for Quino checkerspot butterfly in 2017 and the project applicant received a response that the USFWS had no recommendations for additional studies in 2017.

**I168-17:** This comment asks if revegetated temporary impacts become part of the Habitat Preserve immediately. As stated in Mitigation Measure BIO-1, on-site temporary impacts become part of the Habitat Preserve once restored in compliance with Mitigation Measure BIO-2, Upland Restoration Plan. Mitigation Measure BIO-2 establishes specific performance standards for restoration to demonstrate successful revegetation which would be tracked through the implementation of the MMRP. Thus, once the revegetation of temporary impacts of temporary impacts are successfully completed, they would become part of the Habitat Preserve.

**I168-18:** This comment requests clarification for Table 5-3 in the Biological Resources Technical Report (Appendix D) regarding willow monardella. There are a total of 1,622 willow monardella individuals within the project site. Of those 1,622 willow monardella individuals, as

summarized in Table 5-3, 1 individual would be impacted by the project, and 49 individuals occurring along existing retained trails and adjacent to proposed trail creation areas within the Habitat Preserve would be avoided through maintenance and management of trails as outlined in the Public Access Plan (Appendix T of the Biological Resources Technical Report). Therefore, a total of 1,621 individuals occur within the Habitat Preserve and would be conserved and not impacted. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-19:** This comment asks why surveys on Magnolia are waiting until pre-construction. Magnolia Avenue was not surveyed for special-status plant species due to lack of legal access to the parcels. As stated in Section 3.2.1, Resource Mapping, in the Biological Resources Technical Report (Appendix D), the proposed Magnolia Avenue road extension area was mapped using an aerial drone in 2017 to map vegetation communities. As stated in Section 5.1.2, Special-Status Plan Species, in the Biological Resources Technical Report, the Magnolia Avenue extension is highly disturbed and the potential for special-status plant species to occur is low. Preconstruction surveys will be conducted when legal access is provided. The EIR used the best available

information and requires measures to conduct surveys once access is granted.

**I168-20:** This comment states that floral species on the watch list are not considered for mitigation, which may demonstrate a lack of commitment to conservation for those species. This comment is unclear because there are no watch list floral species. In regards to lower ranking special-status species, CRPR 4 species are relatively common in this portion of the County of San Diego, and therefore are not considered significantly rare. However, although impacts to these CRPR 4 species are not considered significant, Mitigation Measures BIO-1 and BIO-2 would preserve or restore suitable habitat for these species.

**I168-21:** This comment requests details on how the Habitat Preserve Manager is to monitor trail use in order to determine if actions are needed to decrease impacts. Appendix P, On-site Preserve Management Plan, of the Biological Resources Technical Report lists monitoring requirements, including that the Preserve Manager will prepare an annual report that summarizes monitoring and management activities on the Habitat Preserve, including baseline surveys, general stewardship monitoring, impacts of public use and the effectiveness of enforcement, effectiveness monitoring, and targeted monitoring (refer to Section 1.4.4 Reporting Requirements). Further, the Habitat Preserve Manager

will be actively engaged with management activities across the Habitat Preserve and will notice trail usage and any potential indirect impacts due to illegal trail use (e.g., leaving the trail, littering, etc.).

**I168-22:** This comment asks how the cumulative Threshold 5, Tree Preservation, would apply to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, as stated in Section 4.3.6.5, Cumulative Threshold 5: Tree Preservation, of the EIR, the proposed project would be required to comply with the Urban Forestry Ordinance as condition of project approval. Section 4.3.6.5 states that adjacent and nearby jurisdictions, including the City of San Diego, County of San Diego, and federally managed lands like MCAS Miramar, would be required to comply with applicable regional or local tree preservation policies or ordinances. As discussed in Section 4.3.5.5 of the EIR, the City of Santee's Urban Forestry Ordinance contains tree-related policies, regulations, and generally accepted standards for planting, trimming, and removing trees on public property and public rights-of-way (Santee Municipal Code, Section 8.06). The ordinance gives the City control of all trees, shrubs, and other plantings in any street, park, public right-of-way, landscape maintenance district or easement, or other City-owned property. City review of

development plans for the proposed project would ensure that the proposed improvements conform to the requirements of the Urban Forestry Ordinance. Therefore, the proposed project and other cumulative projects would be required to comply with the Urban Forestry Ordinance as a condition of project approval.

**I168-23:** This comment asks how the public would be notified of the results of the Upland Restoration Plan in Biological Resources Technical Report Mitigation Measure BIO-2. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Annual biological reports will be prepared by the project biologist/habitat restoration specialist (PB) and submitted to the City each year, as stated in Section 7.3 Reporting in Appendix Q, Upland Restoration Plan, of the Biological Resources Technical Report.

This comment states that when temporary impacts fail they would be subsumed under permanent impact mitigation and then asks what would happen if permanent impact mitigation fails. As stated in Biological Resources Technical Report Mitigation Measure BIO-2, if temporary impact areas are not considered appropriate for restoration of the sensitive native plant community that originally was mapped in that area, these areas shall be considered permanently impacted and mitigated in conformance with the mitigation ratio for permanent impacts to sensitive



upland vegetation communities. It should also be noted that if temporary impacts are deemed appropriate for restoration then BIO-2, which includes specific performance standards for restoration to demonstrate successful revegetation, would be tracked through the implementation of the MMRP. If the applicable success criteria is not achieved, measures must be taken to improve performance in compliance with the MMRP. Thus, once the revegetation of temporary impacts of temporary impacts are successfully completed, they would become part of the Habitat Preserve. Permanent impacts would be mitigated through the establishment of the Habitat Preserve, which requires recordation of a Habitat Preserve conservation easement and in-perpetuity management by the Preserve Manager in accordance with a Preserve Management Plan (Appendix P to the Biological Resources Technical Report [Appendix D]).

**I168-24:** This comment asks for clarification on the purpose of “ownership agreements and long-term management strategy” in Mitigation Measure BIO-12 (which is the same as Biological Resources Technical Report MM-BIO-3). Mitigation Measure BIO-12 summarizes Appendix R, Vernal Pool Mitigation Plan, to the Biological Resources Technical Report (Appendix D). Please see the Appendix R, Vernal Pool Mitigation Plan, specifically Section 10, Long-Term Management, for details. This comment does not raise a significant

environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-25:** This comment asks who chooses the City approved contractor for replanting for Mitigation Measure BIO-4 (which is the same as Biological Resources Technical Report MM-BIO-5). This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Nonetheless, the applicant will select a qualified Habitat Restoration Contractor to implement the mitigation work, see Appendix S of the Biological Resources Technical Report (Appendix D) for details on criteria for selecting appropriate contractors and the responsibilities for the implementation, management for the mitigation program.

This comment asks for the options if replanting fails, who pays for the costs, and if it would happen in the City or off-site. As stated in Appendix S of the Biological Resources Technical Report, Appendix D to EIR, replanting of oak trees shall occur in the general areas where grasslands occur adjacent to existing oak trees within the Habitat Preserve. Success criteria are outlined in Appendix S of the Biological Resources Technical Report (Appendix D) as well as adaptive management strategies to meet the success criteria. Specifically, in the event the “established” success criteria cannot be

achieved, the project applicant would be required to implement remedial measures recommended by the Restoration Specialist to bring the site into alignment with the performance standards. The applicant is financially responsible for the implementation and management of this mitigation project.

**I168-26:** This comment asks who decides the schedule of surveys for African clawed frog. The methods for surveys, including timing of surveys, is included in Mitigation Measure BIO-19 in Section 6.3 Wildlife Species, and Appendix P, Preserve Management Plan, of the Biological Resources Technical Report (Appendix D). The Preserve Manager would be responsible for overseeing monitoring wildlife species. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-27:** This comment asks is there any possible developer input for choice of Biologist. As stated in Biological Resources Technical Report (Appendix D) Mitigation Measure BIO-18 in Section 6.6 Standard Conditions, the project applicant shall retain a City-approved biologist for monitoring activities. Thus, while the applicant is responsible for selecting the biologist, it must come from a list approved by the City. The biologist shall monitor these activities to ensure that the project applicant complies with the appropriate Standard Conditions and

Mitigation Measures. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-28:** This comment asks about the locations for the off-site mitigation, and whether those areas be under the same guidelines as the PMP. As stated in Mitigation Measure BIO-15 (Wetlands Mitigation Plan) in Section 6.4, Jurisdictional Aquatic Resources, and in Appendix S, Wetland Mitigation Plan, of the Biological Resources Technical Report (Appendix D), the off-site preservation/enhancement component may occur at the 11-acre parcel, owned by the project proponent, adjacent to the lower Santee Lakes to satisfy the off-site preservation/enhancement requirement (refer to Figure 4, Site Selection Areas, in Appendix S in Section 2.5, Site Selection). Additionally, the Mitigation Measure and Appendix S state that the off-site restoration program will be subject to the same standards and rules as the on-site mitigation program, including management of access control, invasive species, and native vegetation cover and diversity.

**I168-29:** This comment asks the following questions: how the City will make habitat stewardship a priority; who is the City appointed Subarea Coordinator and/or Preserve Steward; how is the staff person chosen to help the Preserve Manager; and how is it not a conflict if the developer hires

the Preserve Manager. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

Nonetheless, for informational purposes, the following responses are provided. As stated in Appendix P, Preserve Management Plan, of the Biological Resources Technical Report in Section 1.4.1, Responsibilities and Responsible Parties, the primary duty of the Preserve Manager will be to manage and monitor the Habitat Preserve pursuant to the approved PMP. The Preserve Manager will also report periodically to the City-appointed Santee MSCP Subarea Plan Coordinator and/or Preserve Steward regarding the status of the Habitat Preserve, progress of active management actions, and issues that need addressing. The City will be required to oversee implementation of the PMP through the review of annual reports and on-site inspections, and to coordinate with regional information gathering efforts. The City will support enforcement needs recommended by the Preserve Manager through appropriate law enforcement actions and adoption of appropriate City codes and ordinances that implement the Draft Santee MSCP Subarea Plan.

The Preserve Manager will be an independent third party separate from the Homeowners Association (HOA), City, and developer. Initially, the developer will hire and fund the Preserve Manager; however, once the HOA is

formed, it will gradually take over funding responsibility for the Preserve management and the Preserve Manager position. The HOA will not direct, in any way, the activities of the Preserve Manager. Any change in the designated Preserve Manager will be approved in writing by the City and Resource Agencies. Furthermore, the Preserve Manager has an obligation to implement the Preserve Management Plan (Appendix P to the Biological Resources Technical Report) and must meet the qualifications outlined in the Preserve Management Plan (Appendix P to the Biological Resources Technical Report) to be selected. Therefore, the Preserve Manager is not appointed by the developer nor is it a conflict of interest.

**1168-30:** This comment asks if there is no cost analysis until the Preserve Manager is chosen and approved, how the HOA fees be determined to advertise to potential home buyers, and if the fees are enough to cover Preserve costs.

As stated in Section 1.4.2 Financial Responsibility and Mechanism of Appendix P, Preserve Management Plan, of the Biological Resources Technical Report, the project applicant is responsible for all PMP funding requirements, including direct funding to support the PMP start-up tasks and an ongoing funding source for annual tasks that is tied to the property to fund long-term PMP implementation. The applicant will ensure funding for long-term management through assessments from

1168-30  
cont. | What if HOA fees are not enough to cover costs, who will pick up the uncovered Preserve costs?

1168-31 | For issues that meet “working management threshold” and require immediate action, how will that work if surveys are only once per year?

1168-32 | Brush management—how will this be successfully implemented and what recourse if not? Sky Ranch’s HOA is supposed to be covering this but it is not—what can this project do differently to ensure a different outcome than Sky Ranch?

1168-33 | **3.2.1 Site Protection Measures** Who is the Qualified long-term natural lands manager? How do they fit in with the Preserve Manager?

And, one last question:  
Why weren’t the vibration impacts to wildlife, especially to Western Spadefoot toads, not addressed?

1168-34 | The study that has most specifically shown an adverse effect on amphibians related to road noise is that of Brattstrom and Bondello (18) who found spadefoot toads (*Scaphiopus couchii*) undergoing estivation to respond to motorcycle sounds (up to 95 dB(A) at 0.4-4.4 kHz) by leaving burrows, which could have a detrimental effect if it occurred at the wrong time of year.  
found at [https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise\\_effect\\_on\\_wildlife/effects/wild04.cfm](https://www.fhwa.dot.gov/ENVIRONMENT/noise/noise_effect_on_wildlife/effects/wild04.cfm)  
article referred to as citation 18 is at [https://link.springer.com/chapter/10.1007/978-1-4612-5454-6\\_9](https://link.springer.com/chapter/10.1007/978-1-4612-5454-6_9)

1168-35 | I await a thorough and on-point answer to each of my questions.

Sincerely,

Michele Perchez  
Santee Resident

the HOA, which will be guaranteed through a dormant Community Facilities District, or comparable funding mechanism pursuant to the 2008 U.S. Environmental Protection Agency Compensatory Mitigation Rule, to be used by the Preserve Manager to implement the PMP. Section 1.4.3, Conceptual Cost Estimate of Appendix P of the Biological Resources Technical Report includes Table 2, biological resource management tasks that are planned for the Habitat Preserve. A final ongoing Property Analysis Record and cost estimate will be prepared for the Habitat Preserve when a Preserve Manager has been selected and approved by the City.

**1168-31:** This comment requests clarification for “issues that meet ‘working management threshold’ and require immediate action, how will that work if surveys are only once per year.” It is unclear what the comment is referring to, but it is assumed the comment is referring to reporting requirements in Section 1.4.4 in the Preserve Management Plan, Appendix P of the Biological Resources Technical Report (Appendix D). The comment is incorrect when it states surveys are only once a year. In contrast, the Annual Report is once a year, and surveys are conducted multiple times a year, as stated in Table 2, Resource Management Tasks, in Section 1.4.3, Conceptual Cost Estimate, which includes monitoring task at a monthly frequency. Monthly monitoring reports, as needed, will be submitted to the

City of Santee Development Services Department, and the monitoring reports will include remedial recommendations and issue resolutions discussions when necessary (refer to Section 4.2.7, Monitoring of the Preserve Management Plan).

**I168-32:** The comment asks how brush management will be successfully implemented and the recourse if not. The comment also references a project unrelated to the EIR and asks for a comparison between that project and the EIR to ensure a different outcome. Please see the Fire Protection Plan (Appendix P1) for details on brush management implementation. The remaining portions of the comment do not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-33:** This comment asks who is the “qualified long-term natural lands manager”, and how do they fit in with the Preserve Manager. The comment is assumed to be referring to Section 3.2.1, Site Protection Measures, in Appendix S, Wetlands Mitigation Plan, of the Biological Resources Technical Report, since this is not clearly stated in the comment. The qualified long-term land manager is referring to the Habitat Preserve Manager. See response to comment I168-29. This comment does not raise a significant environmental issue regarding the



adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I168-34:** This comment asks why vibration impacts to wildlife, particularly western spadefoot, were not addressed in the EIR and includes a summary of a study that has shown adverse effects on amphibians from off-road vehicle recreational activities in open space (Brattstrom and Bondello 1983). Indirect impacts to wildlife, including noise, were analyzed in the EIR (refer to Section 4.3.5.1 Threshold 1: Candidate, Sensitive, or Special-Status Species). To reduce noise impacts, road signs, speed bumps, or other traffic-calming devices shall be employed along the north-central collector road (MM-BIO-20 in the Biological Resources Technical Report [Appendix D]).

In regards to the study cited in the second part of the comment, currently the project site contains an extensive existing trail system, much of which is subject to frequent unauthorized off-road vehicular traffic and unauthorized human activities that have been detrimental to the sensitive habitats and natural resources on site. Without project implementation, indirect impacts to biological resources could continue to occur because unauthorized motorized and non-motorized vehicles would continue to use the site, causing degradation of the natural habitat and sensitive species. Therefore, sensitive species, including western spadefoot would benefit from active habitat

management in the Habitat Preserve under the proposed project which would prevent unauthorized uses within the Habitat Preserve. Please see the Thematic Response – Western Spadefoot for details on the mitigation program for this species.

**I168-35:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

### References

Brattstrom, B.H. and Bondello, M. C. 1983. Effects of Off-Road Vehicle Noise on Desert Vertebrates. 1983. In: Webb R.H., Wilshire H.G. (eds) Environmental Effects of Off-Road Vehicles. Springer Series on Environmental Management. Springer, New York, NY. [https://link.springer.com/chapter/10.1007/978-1-4612-5454-6\\_9](https://link.springer.com/chapter/10.1007/978-1-4612-5454-6_9).

## Comment Letter I169: Mary Pretto-Flagstad, July 13, 2020

**I169**

**I169-1:** This comment states the commenter’s opposition to the proposed project due to traffic and fire. Section 4.16, Transportation, in the EIR analyzes the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzes the impacts of the proposed project, including the cumulative impacts, and identifies feasible mitigation measures to reduce the impacts to transportation, although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

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**From:** Mary Pretto-Flagstad <mpflagstad@yahoo.com>  
**Sent:** Monday, July 13, 2020 6:38 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Draft EIR

I169-1 No to Fanita Ranch. Traffic has not been resolved. I noticed here too be close to Open space but already deep in the area if there was a fire, there would be problems. But mostly traffic, in non pandemic times took 35 to 45 min extra to and from work. The roads arent desined for 3000 more homes in this area

[Sent from Yahoo Mail on Android](#)

In addition, Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan (2020) and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also

references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

## Comment Letter I170: Michael Ranson, July 13, 2020

July 13, 2020  
To: Chris Jacobs, Principal Planner  
Subject: Fanita Revised Draft EIR  
Department of Development Services  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071  
Email: cjacobs@cityofsanteeca.gov

Mr. Jacobs,

I read an Op-ed this weekend regarding the DEIR written by a person that is not a resident of Santee. I mention that she was not a resident because it was clear to me that this person had no real knowledge of our city due to the way she described her possibly "last hike on the Stowe Trail". She had heard that it was about to be destroyed by a developer. It really was an over the top doomsday scenario carefully crafted to solicit comments to you re this EIR. It get it. This is how they engage citizens to act. They write an Op-ed, get it published in various online sources and hopefully gather additional opposition.

I170-1

One thing she wrote stuck out at me and made me realize what might be the real purpose of all these comments.

"...citizens throughout the county can join them in their efforts by sending emails that voice their concerns about Fanita Ranch. Their letters will go on the record, potentially reviewed by a judge, should the situation evolve into a court battle."

Should the situation evolve into a court battle? With the California Environmental Quality Act in place, there is no doubt that the decision on the Fanita Ranch development will be made by a judge. With CEQA, there is nothing stopping the slow movement of this process arriving at its final decision destination—in a courtroom and before a judge.

**I170**

**I170-1:** This comment letter is a commentary on a newspaper article pertaining to the proposed project. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I170-2:** This is a copy of the article the commenter discusses in comment I170-1. It also includes several comments from the commenter, article author and Van Collinsworth regarding the accuracy of the article and the comments. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1170-1  
cont.

With the reality that all of this “should” be reviewed by a judge, I thought I would include the Op-ed, my comment to the author and her reply back after she sought additional consult from her friend. My hope is that this provides some context to the judge that will be making the final decision on the Fanita Ranch development.

ORIGINAL LINK: <https://obrag.org/2020/07/you-better-hike-the-stowe-trail-in-santee-before-fanita-ranch-is-built-and-its-too-late/>

## ‘You Better Hike the Stowe Trail in Santee Before Fanita Ranch Is Built and It’s Too Late’

HomeFed Corp. Plans 3,000-Unit Development in Santee  
*By Colleen Cochran*

The threat of bulldozers spurred me to hike the Stowe Trail in northern Santee. The stretch, that leads from Santee Lakes through Sycamore Canyon on Fanita Ranch, is one of the last havens for endangered Quino checkerspot butterflies, creatures that once fluttered abundantly throughout San Diego County skies, and for endangered least Bell’s vireo songbirds.

1170-2

Because I had been hearing a lot of news about HomeFed Corporation’s plans to ravage the area by constructing Fanita Ranch, a development of 3,000 units of multistory townhouse boxes, I decided I better go on that hike before it becomes too late.

This past Saturday, I arranged to meet my friend, Nancy, at the very northern end of Fanita Parkway, which is where I had heard the Stowe Trail begins. It is there that Fanita Parkway transforms from bustling thoroughfare to quiet country road. So quiet in fact, that Nancy and I, while still seated in our separate cars in the middle of the road, managed to hold a few minutes of conversation concerning our guesses as to where the entrance to the trail might be, and no cars drove up to beep us out of the way.

On the west side of Fanita Parkway, we saw Santee Lakes Campground, an idyllic hideaway filled with families happily swimming and fishing, and on the other, houses atop a hillside. It took us a bit to find the sign demarking the entrance to the trail, which was located aside the Padre Dam Municipal Water District building. A dusty trail and a sea of green lay before us, and we set off.

The trail led Nancy and me to a world where wild flowers abound and creatures chirp, flutter, and buzz, and the air smells clean. A yellow striped snake sunbathing on the path spotted me first and quickly wiggled into some brush, so that I only caught a fleeting glimpse of it. I did a Google search later that day, and I think it was



1170-2  
cont.

a California striped racer. Some mountain bikers were using the path too, but largely, we had the Stowe Trail to ourselves.

The Fanita Hills, as the region is sometimes called, is home to coyotes, mountain lions, gray fox, and 18 other mammal species, 21 types of reptiles and amphibians, and over 100 bird species. My friend, Van Collinsworth, Director of PreserveWildSantee.org, told me that if we were to have hiked further, we would have felt as if we had stepped back in time because there would not have been a trace of anything manmade in sight, save the occasional flying airplane.

We would have seen the precious vernal pools, rare only because 98 percent of them have been destroyed due to San Diego County development. Within them live some of the last remaining San Diego fairy shrimp.

If HomeFed's Fanita Ranch development is built, the sleepy northern end of two-lane Fanita Parkway will be turned into four lanes, two in each direction, with a raised strip in the middle. The speed limit will be increased from 40 to 50 mph, although I very much doubt drivers will be able to reach that top speed most hours of the day, since the only ways in and out of the Fanita Ranch complex will be via Fanita Parkway or Cuyamaca Street, and there will be 8,000 residents, an additional 15 percent of Santee's present population, using those roads.

More likely, these new Santee residents will be spending a good portion of their days idling in their cars as they wait to cross over or onto Mast Boulevard.

Construction noise will replace the chirps and buzzes of nature's creatures, so Santee Lakes Campground will become a far less enticing destination. In its Environmental Impact Report (EIR), HomeFed promised to mitigate construction noise by putting in place a sound barrier wall. Campers will, however, still be left with fumes, dust, and loss of views of greenery, and they will no doubt still hear the construction noise too.

The construction, which will go on for 15 years, will leave present Santee residents enduring streams of trucks going through their area, endless noise, and dusty air. Air quality won't just be reduced during construction, it will be reduced forever. In the end, citizens will have lost the lovely natural barrier that gave their city its hometown feel, only to have it replaced with hunks of walls, gates, parking lots, and unsightly clone houses.

All citizens throughout San Diego County will be negatively impacted by the development. Because the Fanita Ranch area is an essential biological reservoir linking adjacent open spaces protected by the county's Multiple Species Conservation Program, users of Mission Trails Park can expect to see a depletion in wildlife. Vistas throughout the region will be destroyed, air quality will worsen, and traffic will increase.

Traffic on Mast Boulevard, already the stuff of commuters' nightmares, will become horrific. The impact of this traffic will be felt on West Hills Parkway and Mission Gorge Road, all the way down through Allied Gardens and Grantville.

HomeFed promises to add an extra lane at the Mast entrance to SR-52, but that remedy will not prove apt to counteract the load of traffic that is going to infect that highway. Some commuters will seek relief by using the I-8, so traffic will worsen on that highway as well.

Santee City Councilman Stephen Houlahan and Van Collinsworth of PreserveWildSantee.org have put together the General Plan Protection Initiative that would enable citizens to vote on whether they want Fanita Ranch, a project that vastly exceeds size parameters set forth in the Santee General Plan.

Unfortunately the Santee City Council, most of whose members are more beholden to the Building Industry Association than their own citizens, used a “study” to delay the Initiative vote from 2018 until November of 2020, thus providing opportunity for a contested “approval” of the megaproject ahead of the Initiative vote.

Santee citizens are fighting city council’s underhanded scheme, and citizens throughout the county can join them in their efforts by sending emails that voice their concerns about Fanita Ranch. Their letters will go on the record, potentially reviewed by a judge, should the situation evolve into a court battle.

While county residents are waiting to hear the results of their efforts, I suggest they take a walk along Slowe Trail. If HomeFed has its way, one day soon, the trail will be transformed to noisy suburban sprawl.

Comments can be sent to Chris Jacobs, Principal Planner City of Santee, of the EIR: [cjacobs@cityofsanteeca.gov](mailto:cjacobs@cityofsanteeca.gov)

*Colleen Cochran, JD, is a legal editor, nature enthusiast, PB resident and warrior against climate change.*

**My first comment:**



**Mike** [July 11, 2020 at 1:45 pm](#)

This has to be one of the most ridiculous doomsday scenarios I have read regarding the HomeFed Fanita Ranch project. Multiple inaccuracies and omission of all amenities that the project will offer my city and all county residents. A project that will preserve 76% of the land forever. A planned community farm for Santee residents, orchards, restaurants, a small grocery store, a new fire station and a new school if our Santee School district wants one. There are also over 35 miles of new and public trails planned for Fanita Ranch. The trail this op-ed writer hiked was on private property where she would have been considered to be trespassing if it weren't for HomeFed granting us use of their trail on their property. I appreciate the concern from this Pacific Beach resident and I admire the creative writing but it seems she knows little to nothing about this project except for the talking points fed to her from the special interest Political Action Committee that seeks an alternate plan for Fanita Ranch.

“multistory townhouse boxes” FALSE

“we saw Santee Lakes Campground, an idyllic hideaway filled with families happily swimming and fishing” Idyllic—yes, swimming—no—there is NO water contact allowed at Santee Lakes.

1170-2  
cont.



1170-2  
cont.

“the sleepy northern end of two-lane Fanita Parkway will be turned into four lanes, two in each direction, with a raised strip in the middle.” FALSE—Fanita Parkway in this area will be a two lane divided road. One going in and one coming out. WATCH: <https://vimeo.com/400778769>

“Unfortunately the Santee City Council...used a “study” to delay the General Plan Initiative vote from 2018 until November of 2020”. OPINION—The responsibility of making certain that this initiative was placed on the 2018 ballot was that of the proponents of the initiative. Poor planning and time management postponed the date that this was placed on the ballot. Our City Council wisely chose to conduct a study showing the financial impacts of this initiative. The study shows that this initiative will have a negative impact on the finances of our city. <https://www.cityofsanteeca.gov/home/showdocument?id=17093>

“Santee citizens are fighting city council’s underhanded scheme...” FALSE—we are fighting a Political Action Committee that seeks an alternate plan for Fanita Ranch and does so by dividing our community with rubbish like this op-ed.

If you want to learn facts about the project, go to <http://www.fanitaranch.com>

REPLY



See response in comments below.

Response below:



**Colleen Cochran** July 11, 2020 at 7:11 pm

Below are both author’s responses to this rebuttal, as well as Van Collinsworth’s responses, as gathered from the author’s additional interview with him.

The 76% preserve. Author: Set forth in the EIR, and none of it sounds good to me: HomeFed will attempt to salvage important plants, like Coulter’s saltbush and San Diego goldenstar by transplanting them in other areas. Light will be directed out of remaining wilderness areas “whenever feasible.” “To the extent feasible” it will not impact nesting birds and raptors. It will attempt to replicate nature by creating its own vernal pools and transplanting remaining SD fairy shrimp into them. Van Collinsworth: Unfortunately Mr. Ranson has been so busy drinking the developer’s and the mayor’s Kool-Aid that he hasn’t taken the time to review the Environment Impact Report. The developers spin

I170-2  
cont.

76% open space because they include Fuel Management Zones extending as far as 160 feet and other impacted/developed spaces without roads and houses.

Structures: Author: The developer's brochures tout the Fanita Ranch subdivision as a composition of villages, terminology that conjures imagery of quaint cottages from fairy tales, when in fact it will be a monstrous hunk of walls, gates, parking lots, and antiseptic multilevel townhouse boxes that might be better suited for location on a city street rather than in the heart of a wilderness area, that is, if they were attractive. (Since pictures cannot be uploaded in this comments section, I posted on the OB Rag's FB page a picture of Fanita Ranch structures taken from the Environmental Impact Report.)

School, etc. Author: The only reason a new school would become necessary would be if a megadevelopment were to be constructed. If it were to be, Santee taxpayers would be the ones left funding the development's school... and its police and fire services.

Trails and Farm. Author: I don't think that 35 miles of new public trails or farmland is necessarily a good idea.

Swimming. Author: Santee Lakes allows boaters to recreate in the lakes and has a pool for swimming.

Fanita Parkway. Author: From the Environmental Impact Report: EIR 3.4.1.4 Fanita Parkway The proposed project would improve portions of on-site Fanita Parkway to accommodate the increased project traffic and extend the northern limit of the street to provide a western entry onto the project site. Fanita Parkway currently begins at Carlton Oaks Drive and extends north approximately 1.7 miles until it ends at Ganley Road. The proposed project proposes to widen Fanita Parkway between Mast Boulevard and Lake Canyon Road from an existing two-lane street with no median to a four-lane divided parkway/major arterial with a landscaped median. Bicycle lanes would be provided on the eastern (northbound) and western (southbound) sides of the street and, in combination with a buffer, act as emergency lanes for first responders in the event of an emergency or evacuation. A multi-purpose trail would be provided on the western side of the street. Parking along Fanita Parkway would be limited to emergency parking only. Van Collinsworth: The biological preserve would be a fragmented 62.5% of the site with wildlife subjected to road kill on -- yes -- 4-lane segments of Fanita Parkway with "significant and unavoidable" noise impacts.

Santee City Council Study. Van Collinsworth: The city council knew exactly what they were doing to hire the developers consultant to perform a study. They were so eager to delay the vote that they didn't

even bother to ask the cost before approving it. The council would later find out that the propaganda piece used to delay the democratic process cost resident taxpayers \$40k for delay.

Finally, Santee voters overwhelmingly rejected a 3,000-unit Fanita Ranch project in a referendum organized by Preserve Wild Santee volunteers. The courts defeated the next development attempt. Residents are wondering why developer contributions can purchase another bite at the apple.

My reply back and final comment as of writing this letter:



Mike July 11, 2020 at 10:02 pm

Thank you for finding it necessary to rebut my comments. It is interesting that an additional interview with Mr. Collingsworth, the Director of the Political Action Committee, Preserve Wild Santee was conducted so that he could respond to me (or really, personally insult me because of my support for the project.)

"The 76% preserve"—your rebuttal is essentially a difference of opinion so I will leave it at that. Mr. Collingsworth finds it necessary to insult me first and then declare he knows how much time I have spent reviewing the EIR. This is his typical tactic of division. Those that support the project drink too much Kool-Aid or maybe we are "shills" for the developer. Supporters also might be secret political operatives that are paid by the developer. It's even worse if you are a political opponent of this PAC. All political opponents of this PAC are corrupt and lining their pockets with donations from developers, the BIA and even the San Diego Deputy Sheriff's Association. Yes, he claims that the Sheriff's organization launders money for developers. <https://www.facebook.com/PreserveWildSantee/posts/10158151416969294>

"Structures"—again, your rebuttal is essentially a difference of opinion.

"School"—mostly opinion. Valid (and obvious) point the school may be needed because of the development. My opinion is that it is a good thing the developer will build this school if our school district tells them they want it. Yes, Santee taxpayers will be paying for school and fire—the Santee taxpayers that move into Fanita Ranch when it is built.

"Trails and Farm"—thanks for the opinion. I love the idea of 35 miles of public trails that are maintained and safe to use. I really love the idea of the farm for all of Santee. I actually spent a half

1170-2  
cont.



I170-2  
cont.

day at the concept farm for this project and found it an exciting amenity. Events, new gathering spaces, community farm stand with farm to table dining are all possible in the new plan for Fanita Ranch. We'll have to agree to disagree on whether this is a good idea.

"Swimming"—true, Santee Lakes has peddle boats for use but right now only 6 are in use because of COVID19. They are on Lake 7 for campers in the cabins only and I suppose you might have seen one on your way to the trail. Regarding the pool, maybe I misunderstood because your original oped said "this past Saturday" and "filled with families happily swimming..." This past Saturday was the 4th of July and my wife and I were actually camping. We love the Lakes. Anyway, because of the Patriotic Golf Cart Parade that took place near the pool, no swimming was going on. I guess I also incorrectly assumed that you actually saw families happily swimming because that is not possible to do from anywhere outside the campground. My mistake.

"Fanita Parkway"—Thank you for correcting the original error. You originally stated, "the sleepy northern end of two-lane Fanita Parkway will be turned into four lanes, two in each direction, with a raised strip in the middle." These are the facts so there is no confusion. Fanita Parkway will remain two lanes from Carlton Hills Blvd to Mast Blvd. From Mast Blvd to Lake Canyon you have the correct info in your rebuttal. From Lake Canyon to Ganley Road, the road will reduce to one lane north with two lanes south along with a wide landscaped median. From Ganley to the project, Fanita Parkway will be extended as a two lane road up and into the project. All this can be seen at the link I posted above.

"Santee City Council Study"—Van Collinsworth's response is a matter of his opinion and also inaccurate. "They were so eager to delay the vote that they didn't even bother to ask the cost before approving it. The council would later find out that the propaganda piece used to delay the democratic process cost resident taxpayers \$40k for delay." Again, opinion and inaccurate. This item was on the agenda along with the cost. It was discussed and commented on before it was approved by the Council. I suggest that you reference pg 314 of the Aug 22, 2018 agenda here: <https://www.cityofsanteeca.gov/home/showdocument?id=17047> What is factual is that the responsibility for time management and planning the signature gathering to make certain that an initiative makes it to the ballot falls on the proponents of the initiative. Mr. Collinsworth is an experienced political activist and has been the Director of a registered Political Action Committee for a couple decades so, in my opinion, it is odd that this mistake was made.

1170-2  
cont.

"Finally" this statement is disputed by many and it was a completely different plan for Fanita Ranch with a huge footprint.

Again, I hope that is provides some context to the court that will be making the decision on the Fanita Ranch development.

Sincerely,

Michael Ranson

Santee Resident / Strathmore Drive

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## Comment Letter I171: Brandon Rawinsky, July 13, 2020

I171

I171-1: This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Brandon Rawinsky <brandonbr2011@gmail.com>  
**Sent:** Monday, July 13, 2020 12:09 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Fanita ranch will benefit many peoples daily life's, as well as the environment by cutting down on idling cars stuck and in stop and go traffic.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I171-1 I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Brandon Rawinsky  
9729 Winter Gardens Blvd # 69  
Lakeside, CA 92040  
brandonbr2011@gmail.com

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## Comment Letter I172: Ann Rebuffattee, July 13, 2020

**I172**

**I172-1:**

This comment states that the commenter is concerned with their children’s future and habitat for wildlife. This comment further recommends reading an article written by Colleen Cochran and states this is not a positive plan. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. Regarding habitat for wildlife, Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, in the EIR fully analyze potential impacts, including cumulative impacts to sensitive plants, wildlife, and vegetation communities and habitats. Based on the opinions of the biological experts who prepared the analyses, the EIR concludes that impacts to sensitive plants, wildlife, and vegetation communities and habitats would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

---

**From:** ann.rebuffattee <grannyreb@hotmail.com>  
**Sent:** Monday, July 13, 2020 3:49 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

I172-1 | I am a resident of San Diego, in the San Carlos area, and an employee in the Santee School District. I am very concerned about our children's future, and the habitat of our wildlife.  
1 | I recommend your reading the article by Colleen Cochran in the "Mission Times Courier" issue dated July 10-August 13, 2020.  
| I agree with her that this is not a positive plan for Santee and the county. Please stop this from happening. At some point we have to say no to development before our environment is destroyed beyond repair.  
| Thank you for your time in this matter.  
| Ann Rebuffattee

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## Comment Letter I173: Rudy Reyes, July 13, 2020

**I173**

**I173-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required. The commenter identifies himself as a “state certified archaeologist.”

**From:** Rudy Reyes <rreyes2777@gmail.com>  
**Sent:** Monday, July 13, 2020 5:19 PM  
**To:** Chris Jacobs  
**Subject:** Archaeological Confidential revised.

**Rudy Reyes**

8655 Graves Ave. 117  
 Santee Ca. 92071  
 (619) 767-8025  
[Rreyes2777@hotmail.com](mailto:Rreyes2777@hotmail.com)

July 0m13 2020

City of Santee  
 10601 Magnolia Ave.  
 Santee CA 92071  
 (619) 258-4100

Fanita Ranch EIR Letter: Archaeological Confidential Information

To whom it may concern:

- 1173-1 My name is Rudy Reyes, As a state certified archeologist; I was honored to defend Santee in the Quail Brush Power plant as a state recognized intervener. I'm also recognized as the "Hero" and one of the worst injured of the 2003 Cedar Wildfires. I'm submitting this letter to the city of Santee in regards to the Fanita Ranch Confidential information I was given access to review as a state archaeologist.
- 1173-2 After having confidentially reviewed the Fanita Ranch redacted 2017 cultural resource Phase 1 survey report, The Rincon Fanita Ranch phase one infill pedestrian survey, and The Rincon Fanita Ranch project; review Phase 2 cultural resources testing and evaluation report.
- 1173-3 In my expert opinion; this project **does** have a significant adverse impact. Without citing confidential specific items; I believe this project would have a negative significant impact on the historical archaeological understanding of this area. I ask council to NOT approve this project.
- 1173-4 The studies presented significant updates to previously recorded sites, provides details for newly recorded sites, and provides very little management recommendation or mitigation for a phase two investigation. Specifically over 22 archaeological sites and 43 isolated archaeological finds were located within the area of potential effect. Three previously recorded sites have had to be combined as part of the survey; CA-SDI-8243, CA-SDI-8337, and CA-SDI-8338.
- 1173-5 Additionally, several new sites an artifact concentrations where located and combined with previously recorded sites, shifting boundaries and in one instance combining several previously recorded sites, not all previous existing sites were surveyed as part of this study due to the density of the artifact concentrations on the ground surface, specifically CA-SDI-

The commenter has not submitted any information to the City of Santee (City) regarding his qualifications to opine on the cultural resources analysis in the EIR. See recommended criteria to practice archaeology specified by the Society for California Archaeology (SCA) at <https://ohp.parks.ca.gov> (SCA Professional Qualification Standards for Archaeologists). These standards are intended to be consistent with but not substitute the Secretary of the Interior’s (SOI) Professional Qualification Standards for Archaeology. The standards “define minimum qualifications for an individual to serve as Principal Investigator (PI) for professional archaeological studies conducted in California. These include investigations carried out to comply with the California Environmental Quality Act (CEQA), Senate Bill (SB) 18, and local government ordinances and policies (including those of municipalities, counties, and special assessment districts in California).” The standards require a certain level of education and professional experience in the field.

- I173-2:** The reviewer opines that the proposed project will have a significant adverse impact. The City disagrees. To address potentially significant impacts the City, in consultation with its SOI Qualified Archaeologist for the proposed project (Rincon Consultants) and consulting Native American tribe and representatives, has designed mitigation measures to reduce impacts to a less than significant level. Section 4.4, Cultural and Tribal Cultural Resources, of the EIR documents the results of the studies and efforts and the full reports are provided in Confidential Appendices E1, E2, E3 and E4.
- I173-3:** The commenter indicates a Phase II investigation should have been recommended and suggests previously recorded sites were not fully surveyed or evaluated. The Phase I study focused on areas where direct impacts would occur. This survey strategy was employed in consultation with the representative of the MLD for the proposed project. Archaeological site boundaries were modified by the archaeologist for the proposed project as a result of the Cultural Resources Phase I Survey Report (Confidential Appendix E1). The redrawing of archaeological boundaries is a common practice as pedestrian surveys identify new localities where archaeological resources are present. Additionally, boundaries may be reduced in cases where archaeological sites are no longer present. Based on the

1173-3 cont. 8383a and Ca-SDI-8243a. Archeological records show the density of these types were known before this study unfortunately their presence was not noted or eliminated from this updated study.

1173-4 The developer has decided to use out-of-date studies and a limited Rincon surface path study in order to make this archaeological site look less than significant. Although all the Developers archaeological Studies have suggested not only Native American monitors be present but that the site is much larger then previously thought, in fact so large that mitigation may not be possible.

1173-5 According to the 2020 Rincon Phase 2 study on page 15 " because of the phase 1 and Phase 2 investigations completed for this project, two resources, CA-SDI- 8283 and CA-SDI-8345, Have been recommended as eligible for the NRHP(National Record of Historic Places and the CRHR(California Record Historic Registry." As a State Certified archaeologist I would recommend to the city of Santee that these archaeological site be preserved and recorded for posterity.

1173-6 As I've said in my previous letter to council; this site is of high historic archeological value and needs to be preserved. I do not believe that mitigation is possible with a site this large which is basically a giant village site. Considering the inclusion of Prehistoric human remains, prehistoric archaeological findings, prehistoric ceremonial cremation and associated burial findings on this site to be a huge archaeological and cultural resource. I would urge Council do not approve the fanita ranch project as its impact on the archaeological record would be highly disastrous, also opening up Santee city to possible archaeological and cultural litigations.

Best regards,  
Rudy Reyes  
Rudy Reyes

survey, the archaeological consultant subsumed several sites within the boundaries of CA-SDI-8243, including CA-SDI-8337 and CA-SDI-8338.

Following the completion of the Phase I Survey Report, a Phase II testing and evaluation plan (Confidential Appendix E2) was completed for archaeological resources within the direct area of impact of the proposed project. The testing and evaluation plan was developed in consultation with the MLD representative and approved by the City. The testing and evaluation plan was designed using the California Office of Historic Preservation Bulletin 5, Guidelines for Archaeological Research Designs (1991). The testing and evaluations program was completed by a SOI Qualified Archaeologist and was observed by Native American monitors of Kumeyaay descent. The testing and evaluation plan was completed using industry standard methodology, and evaluations were completed based on the eligibility criteria for the California Register of Historical resources and the National Register of Historic Properties. The results of the Phase I survey and Phase II testing and evaluation plan are documented in Section 4.4.1.3 of the EIR and the full reports are included as Confidential Appendices E1, E2 and E4.

**1173-4:** The commenter opines that the studies completed for the proposed project were limited in scope and out of date.

The City commissioned a Cultural Resources Phase I Survey Report for the proposed project site and a subsequent Phase II Testing and Evaluation Report for archaeological sites that would be directly impacted by the project development as described in Section 4.4.1.3 of the EIR and detailed in Confidential Appendices E1, E2 and E4. Native American monitors were present for both studies. There is no CEQA requirement that places a time limit or expiration on data that can be used in a technical analysis to support a CEQA analysis, only that the best available information be used. The use of data collected by previous studies to inform the current studies was an acceptable approach to the MLD representative as well as the SOI Qualified Archaeologist for the proposed project and the data was evaluated based on the soundness of methods used for data collection. Previously collected archaeological data is commonly used to supplement studies as this information is critical to an understanding of the archaeological sites and the data previously collected during surveys and testing and evaluation programs. This data is retained by the California Historical Resources Information System and at various archaeological repositories including the San Diego County Archaeological Center and the Museum of Us (formerly, Museum of Man).

- I173-5:** The commenter recommends that two archaeological sites be preserved and recorded for posterity. The City concurs the resources are eligible. The proposed project has been redesigned to avoid and preserve areas of these sites that have been identified as highly sensitive during consultation with the SOI Qualified Archaeologist and consulting Native American groups. For areas where avoidance is not feasible, Mitigation Measure CUL-2 (Phase III Data Recovery Excavation Program) would be carried out. These resources were documented during the Cultural Resources Phase I Survey Report and Phase II Testing and Evaluation Report completed for the proposed project and would be further documented by the SOI Qualified Archaeologist following the completion of the Phase III data recovery program per Mitigation Measure CUL-2. The documentation would include a final report summarizing the results of the Phase III Data Recovery Excavation Program and an updated Department of Parks and Recreation Series 523 form set per Mitigation Measure CUL-2.
- I173-6:** The commenter suggests the entirety of the proposed project site is a village site and cannot be mitigated. The Cultural Resources Phase I Survey Report and Phase II Testing and Evaluation Report completed for the proposed project identified clear boundaries of archaeological sites using surface and subsurface observations as documented in Section 4.4, Cultural and

Tribal Cultural Resources, of the EIR and Confidential Appendices E1, E2, and E4. The Phase II evaluations of several sites exhausted the data potential of those resources; therefore, they require no additional mitigation. Archaeological sites CA-SDI-8243 and CA-SDI-8345 were found to retain integrity and data potential and therefore a Phase III data recovery program and capping and avoidance program were recommended to exhaust the data potential of the resources and protect and preserve in perpetuity localities considered to be highly sensitive. Mitigation Measures CUL-1 (Site Capping Program) and CUL-2 (Phase III Data Recovery Excavation Program) would reduce impacts to a less than significant level and were acceptable to the SOI Qualified Archaeologist retained for the project, the MLD representative and consulting Native American tribe.



## Comment Letter I174: John Riedel, July 13, 2020

**I174**

Chris Jacobs, Principal Planner  
 Department of Development Services  
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 Santee, California 92071  
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Subject: Comments on Fanita Revised Draft EIR related to wildlife corridors and regional planning

Dear Mr. Jacobs:

- I174-1 Thank you for the opportunity to comment on the Fanita Ranch REDEIR. This letter will concentrate on wildlife corridors and their importance of a regional approach. Questions that need to be answered in the review process have been printed in **bold** text for easier location.
- I174-2 The main point is the vital importance of wildlife corridors and how this DEIR fails to take a regional approach to wildlife and wildlife movement. Wildlife corridors are analyzed in Section 4.3.1.5, but the analyses is self-contradictory. There appear to be direct impacts to habitat linkages and wildlife corridors as a result of the proposed project development. While page 4.3-12 states that the project site has no distinct wildlife corridors, the conclusion in this section states, "The entire project site currently functions as a habitat block with no distinct wildlife corridors or linkages." On page 4.3-115, "Two locations pass through the western portion of the project site to MCAS Miramar, one connects the northeastern portion of the project site to lands within the County, and another crosses to the north to lands within the County. As a result, there would be direct impacts to habitat linkages and wildlife corridors as a result of proposed project development." Threshold 4: Native Resident or Migratory Fish or Wildlife Species is listed as "Potentially Significant." **How can it only be Potentially Significant?** The underlined above states otherwise. **Will this impact be updated to Significant in view of this information?**
- I174-3 In Appendix D, the Fanita Ranch wildlife corridors are analyzed and its intersection with regional wildlife corridors, but does not properly address the impacts of the proposed project. It is addressed here, "...the purpose of the wildlife movement study was to assess the degree to which the project site functions as a regional wildlife movement corridor and to evaluate wildlife movement on the project site and off-site lands adjacent to the proposed project." The proposed project design provides for a primary wildlife corridor through the proposed project, with a minimum width of 1,150 feet. It also states, "This criterion meets generally accepted wildlife movement principles and Draft Santee MSCP Subarea Plan Guidelines." **Where does generally accepted wildlife movement principles come from? Is there peer approved literature to support this claim?** The Draft Santee MSCP Subarea Plan has not been approved and guidelines could change. Alignment with the Draft plan can not be used as evidence of appropriate mitigation since it has not been approved, so this EIR must be look at all the direct, indirect, and cumulative impacts to the species in the MSCP independent of that Draft plan. **Will this reference be changed to reflect this?** In Section 4.5.4, "Habitat linkages may serve both as habitat and as avenues of gene flow for small animals, such as reptiles and amphibians." **Will this be updated to include mammals?**
- I174-4
- I174-5

**I174-1:** This comment provides an introduction to this comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.

**I174-2:** This comment states that the EIR fails to take a regional approach to wildlife and wildlife movement. This comment states that EIR analysis is self-contradictory, noting that while the EIR states that the project site has no distinct wildlife corridors, it also states that "two locations pass through the western portion of the project site to MCAS Miramar . . .", citing EIR page 4.3-115 (in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife). This comment concludes that the proposed project would have direct impacts to habitat linkages and wildlife corridors. In addition, this comment asks how the impact to Threshold 4 can be called "potentially significant" if the EIR concludes that an impact will occur, and whether the impact will be updated to significant.

The EIR does provide a regional analysis of potential impacts to wildlife corridors and habitat connectivity. Per applicable criteria in Appendix G of the CEQA Guidelines, the proposed project was evaluated in

Section 4.3.5.4 under Threshold 4 (interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites). Figure 4.3-10, Regional Wildlife Corridors, shows regional wildlife corridors within 5 miles of the project site. The EIR also states that the project site contributes to regional wildlife movement between County open space, MCAS Miramar, and Santee Lakes Recreation Preserve as shown on the City's Draft MSCP Subarea Plan Preserve System Map (see Figure 4.3-3, Regional Planning Context – Draft Santee MSCP Subarea Plan).

The EIR is not contradictory in its treatment of wildlife corridors. The statement “two locations pass through the western portion of the project to MCAS Miramar . . .” cited in the comment refers to regional wildlife corridors. The EIR statement that the project site has no distinct wildlife corridors refers to an absence of distinct local wildlife corridors and habitat linkages on the project site itself under existing conditions (i.e., wildlife are able to freely move throughout the entire project site). Therefore, the project site currently enables wildlife movement, and development of the project site would result in direct impacts. These impacts are considered potentially significant absent mitigation. However, as described in Section 4.3.5.4, mitigation is

recommended. Specifically, Mitigation Measures BIO-1, BIO-6, BIO-9, BIO-10, and BIO-20 preserve on-site habitat areas designed as wildlife movement corridors and provide links to off-site habitat areas. Further, mitigation measures BIO-22 and BIO-23 would design and implement a wildlife corridor and crossings for wildlife movement. Based on the opinion of the biological experts who provided the recommended mitigation, implementation of these mitigation measures would reduce impacts to wildlife corridors and habitat linkages to below a level of significance.

- I174-3:** This comment states that impacts to the project site wildlife corridors and the site's intersection with regional wildlife corridors are analyzed in Appendix D, but Appendix D does not properly assess the proposed project's impacts. With respect to the width of the primary wildlife corridor, this comment refers to the statement in Appendix D that "this criterion meets generally accepted wildlife principles and Draft Santee MSCP Subarea Plan Guidelines" and questions where these principles come from, such as peer-reviewed literature.

Appendix D (Biological Technical Report) to the EIR addresses the proposed project impacts to regional wildlife corridors in Section 5.1.6, Wildlife Movement, for direct impacts and Section 5.2.5, Wildlife Movement, for indirect impacts. Village development would directly impact the northern portion of the project

site that currently contributes to regional wildlife corridors and habitat connectivity west, north and east of the project site. The impact analysis and mitigation strategy are based on this direct impact occurring. Through implementation of Mitigation Measure B-22 (Wildlife Corridors), and as shown on Figure 4.3-9, Local Wildlife Corridors, wildlife movement and habitat connectivity will be preserved along the northwestern and northern boundary of the project site, with Habitat Preserve widths between permanent development and the project site boundary ranging from 619 feet to more than 1,400 feet, providing a buffer between development and off-site open space north of the project site protected and managed as part of County of San Diego Park Preserve lands. Likewise, along the western boundary the Habitat Preserve is 400 to 1,000 feet wide, where it connects to preserved MCAS Miramar open space west of the project site. Because the Habitat Preserve abuts extensive preserved open space to the north and west, the regional wildlife corridors are functionally much broader than just the widths of Habitat Preserve on the project site, as illustrated on Figure 4.3-10, Regional Wildlife Corridors. The Habitat Preserve along the western and northern boundary therefore contributes to the regional wildlife movement and habitat connectivity within approximately 5 miles of the project site, including Goodan Ranch/Sycamore Canyon County Preserve to the north, San Diego County open space to the east, and

MCAS Miramar open space to west. From regional perspective, the proposed project would not substantially constrain wildlife movement and habitat connectivity. Please refer to Thematic Response – Wildlife Movement and Habitat Connectivity.

The evaluation that the minimum 1,150 feet wide north-south primary corridor (Primary 2 on Figure 4.3-9, Local Wildlife Corridors) is consistent with the connectivity concepts contained in the Draft Santee MSCP Subarea Plan Guidelines. Although the Draft Santee MSCP Subarea Plan has not been approved, the connectivity concepts in the plan draw from the broader coordinated science-based San Diego Monitoring and Management Program (SDMMP) established by SANDAG for providing regional consistency and management and monitoring in the San Diego MSCP and MHCP, as well as empirical data on corridor use contained in wildlife corridor studies in the San Diego region conducted by Ogden (1992). The Draft Santee MSCP Subarea Plan defines corridors, such as Primary 2, as “a connection that allows for native species movement, dispersal and migration of wildlife species, and is generally narrower in width than a linkage.” Specific criteria for a corridor related to minimum widths contained in the Draft Santee MSCP Subarea Plan include the following:

- Promote wildlife corridor(s) with a minimum width of 1,000 feet along the entire corridor

length, excluding vegetation fire management zones, accessory uses, limited building zones, and other uses not compatible with long-term biological preservation of the conserved lands to provide for the movement of larger wildlife species, including some edge buffering.

- Allow for corridor pinch points less than 1,000 feet for relatively short distances, where it is not feasible to provide a width of 1,000 feet along entire length of corridor. Ensure corridor has a minimum width of 400 feet for no more than 500 feet of linear distance.
- Wildlife corridor design shall plan for those wildlife species with the largest corridor width requirements.

Even without the Draft Santee MSCP Subarea Plan, corridor concepts and criteria would have been similar to those cited above. For example, the local species likely with the largest corridor width requirements is mountain lion, which is known to move through corridors more narrow than 1,000 feet in the San Diego region, including through a 300-foot wide section for 500 feet of the Carmel Mountain to Peñasquitos Lagoon corridor (Ogden 1992).

**I174-4:** With respect to wildlife corridors discussed in response to comment I147-3, this comment states that the Draft

Santee MSCP Subarea Plan has not been approved, and guidelines could change. Therefore, the Draft Santee MSCP Subarea Plan cannot be used as evidence of appropriate mitigation and all impacts would be analyzed independent of the Draft Santee MSCP Subarea Plan. This comment asks whether the EIR will be revised to reflect this. Please refer to response to comment I174-3, which raises the same issue raised in this comment with regard to the Draft Santee MSCP Subarea Plan.

- I174-5:** This comment refers to a statement in Biological Resources Technical Report Section 4.5.4, “habitat linkages may serve both as habitat and an avenue of gene flow for small animals, such as reptiles and amphibians,” and asks whether this will be revised to include mammals.

The EIR currently states in Section 4.3.15, Wildlife Corridors and Habitat Linkages, that “habitat linkages may serve both as habitat and an avenue of gene flow for small animals, such as reptiles, amphibians, and rodents,” so revising the Biological Resources Technical Report is unnecessary.

I174-6	To connect the two villages of the project, there will be two roads constructed as described on page 4.3-116, however it is stated that at interior streets “V” and “W” it will hinder wildlife movement. Also the farm’s location narrows the manufactured corridor up to 30%. <b>Will there be a plan to protect wildlife from this attractive and dangerous situation a farm could entail? Would it provide safety for residents and wildlife to locate this farm to a more sensible location?</b> Wildlife would have to cross streets “V” and “W” to get to the undercrossing along Cuyamaca Street. <b>How will this transition from wildlife corridor to street to corridor again be constructed? What prevents wildlife from entering the residential community? How is the developer planning for safe crossing of wildlife over and under these streets, for the safety of drivers and the wildlife?</b> When describing the dimensions of the proposed crossing there is this description, “...would meet the <u>suggested</u> 0.6 openness ratio suggested for mule deer and other large mammals in Southern California.” <b>Is there a cited reference for this suggested openness ratio?</b> There is no data provided these measurements would be effective. <b>Has any qualified wildlife biologist been consulted in regards to this design? Why not refer to the list of mammals listed in Table 4.8 in this section instead of using the term “other large mammals in Southern California?”</b>
I174-7	
I174-8	Mitigation Measures BIO-22 and BIO-23 are cited for Threshold 4: Native Resident or Migratory Fish or Wildlife Species, but edge effects and wildlife corridors are unavoidable significant impacts.
I174-9	Mitigation measure BIO-22 describes dimensions of the wildlife corridors, but provides no evidence they will bring the impacts to Less than Significant. <b>Have these plans been studied by a qualified wildlife biologist that the spaces are of sufficient dimensions that wildlife will find safe and adequate to navigate? Is there a study or peer reviewed literature that supports these mitigation measures will be effective?</b> There is no analyses for noise or exposure to urban pollutants or other human related activities will cause edge effects as discussed on page 4.3-40. <b>Will there be mitigation for edge effects to biological resources and the manufactured interior wildlife corridor’s proximity to the residential communities?</b>
I174-10	
I174-11	Streets “V” and “W,” which connect the Vineyard Village to Fanita Commons and Orchard Village are a dangerous component for wildlife as discussed in BIO-20. The mitigation provides for traffic-calming devices to allow wildlife to cross more safely. This is not sufficient for wildlife safety. <b>Could a motion sensor light detecting wildlife approaching the road that warns drivers with a signal? Can a wildlife biologist determine other safety measures beyond speed bumps and street signs? Are landscaping and design elements being used to encourage wildlife crossings in specific, planned areas?</b> This mitigation measure does not lessen the impact to Less than Significant.
I174-12	Mitigation Measure BIO-23 details the wildlife undercrossing at the extension of Cuyamaca St. Even with the illustrations in Appendix D of crossing A, B, C and D, this measure doesn’t provide any evidence this mitigation will be effective in lessening the impact of wildlife movement. <b>Will this Mitigation Measure be updated with data to support the claim that the undercrossing will lessen the hindrance of wildlife movement?</b> This mitigation measure does not lessen the impact to Less than Significant.
I174-13	Mitigation Measure BIO-20 states, “In order to generally protect wildlife species, the following measures shall be implemented <u>during construction</u> .” First and foremost, <u>during construction</u> should be removed. These measures should be implemented indefinitely for wildlife protection. Measure 1 should include, when fencing is erected, it is wildlife safe that will prevent unnecessary snaring, or injuring wildlife.

**I174-6:** This comment notes that the EIR concluded that Streets “V” and “W” will hinder wildlife movement and that the proposed Farm’s location narrows the “manufactured” corridors up to 30%. This comment portrays the Farm as an “attractive and dangerous situation” for wildlife and asks whether the Farm could be located to a more sensible location.

This comment does not identify how or in what way the community Farm would be “attractive and dangerous” to wildlife. As described in the Biological Resources Technical Report, Section 1.3.1, Fanita Ranch Components, the approximately 27-acre Farm would include a large barn providing a venue for special events and the Farm’s operations, including terraced vegetable fields, pasture lands, limited housing for employees, raised gardens, and small-scale animal husbandry. While the Farm would reduce the width of the southern portion of Primary 2 wildlife corridor, at 1,216 feet, the corridor width in this area still exceeds the 1,000 minimum width criterion discussed in response to comment I174-3.

**I174-7:** This comment asks how the transition from wildlife corridor to street to corridor will be constructed, what will prevent wildlife from entering the residential community, and what is the planning for safe crossing of the streets by wildlife and vehicles.



Wildlife entering the residential community was not identified as a risk factor or indirect impact of the proposed project, and therefore there are no specific EIR mitigation measures to prevent wildlife from entering the residential community. Such occurrences are typically referred to local authorities or wildlife organizations if the situation is perceived to pose a risk to wildlife or the public. In addition, Mitigation Measure BIO-20 includes measures requiring covenants, conditions, and restrictions forbidding collection of native wildlife, recommendations for keeping pets and pet food indoors and safe, and restrictions against controlling species such as coyotes, bobcats, and rattlesnakes and other native species unless there is a threat to life or property.

Wildlife crossing of Streets “V” and “W” will be at grade. Potential direct impacts to wildlife crossing the roadways will be mitigated by Mitigation Measure BIO-20 (Wildlife Protection) that incorporates features that will allow wildlife to cross the roadways more safely, including a 25 mile-per-hour speed limit, street signs, speed bumps, and other traffic-calming devices. Each of these features is included in the corridor design criteria to minimize impacts to wildlife movement in the Draft Santee MSCP Subarea Plan. Mitigation Measure BIO-22 (Wildlife Corridors) includes measure 6, which includes that safety lighting for Streets “V” and “W” will

be button started with a timer shut-off delay so that lighting is not on at night except for emergency purposes or pedestrian safety.

- I174-8:** This comment asks whether there is a cited reference for the 0.6 openness ratio standard for the proposed wildlife crossing of the Cuyamaca Street extension, whether any qualified wildlife biologist has been consulted in regard to the undercrossing design, and why the EIR does not refer to the list of mammals listed in Table 8 (of Appendix D, Biological Resources Technical Report) instead of using the term “other large mammals in Southern California.”

Literature reference to openness ratios include Reed et al. (1975), Donaldson (2005), and Clevenger and Waltho (2000, 2003), among many other wildlife crossing studies. For example, Donaldson (2005) found that the length of a structure should be short enough to result in an openness factor of at least 0.25 to discourage white-tailed deer from turning around at structure crossings, so the proposed undercrossing, which has an openness factor of 0.7 (see Appendix D, Biological Resources Technical Report, Section 5.1.6, Wildlife Movement), exceeds this threshold by almost 3 times.

Dudek senior biologist Brock Ortega was directly involved in the undercrossing design. Mr. Ortega has more than 25 years of experience in assessing and helping design

corridor crossings for projects such as the proposed project and is a San Diego County certified biologist.

The comment suggests referring to Table 4-8 in the Biological Resources Technical Report (Appendix D to the EIR) instead of “other large mammals in Southern California.” The City agrees with this request and the text in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish or Wildlife Species, and Biological Resources Technical Report (Appendix D to the EIR) Section 5.1.6 Wildlife Movement, has been revised to state the following:

The proposed crossing, which would measure 6.9 meters (22.5 feet) wide by 3.7 meters (12.0 feet) tall by 35.0 meters (115 feet) long (0.7 openness ratio), would meet the suggested 0.6 openness ratio suggested for mule deer and other ~~large mammals in Southern California~~ mid-sized mammal species documented during camera studies listed in Biological Resources Technical Report Table 4-8, including bobcat and coyote. Mountain lion would also use the undercrossing.

- I174-9:** This comment states that Mitigation Measures BIO-22 and BIO-23 are cited for Threshold 4: Native Resident or Migratory Fish and or Wildlife, but that edge effects and wildlife corridors are unavoidable significant impacts.

It is assumed from the comment that the commenter views the project edge effects as unavoidable significant impacts that cannot be mitigated under the proposed project. It is unclear why the comment refers to wildlife corridors also as unavoidable significant impacts. In any case, the City respectfully disagrees with this conclusion. The EIR identifies potentially significant indirect impacts on wildlife movement in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife, including include noise, vibration, lighting, increased human activity, altered fire regimes, and increased roadkill. The EIR concluded that development of the proposed project would result in significant indirect impacts to wildlife movement corridors both on and off site. The EIR proposes several mitigation measures to reduce these potential indirect effects to less than significant. As described in detail in Section 4.3.5.4, Mitigation Measure BIO-22 (Wildlife Corridors) includes measures to direct lighting away from the Habitat Preserve and to control public and pet access to trails. Other mitigation measures that will reduce indirect impacts include Mitigation Measures BIO-1 (Preserve Management Plan), BIO-6 (Land Use Adjacency Guidelines), BIO-9 (Habitat Preserve Protection), BIO-10 (Weed Control Treatments), BIO-20 (Wildlife Protection), and BIO-21 (Fire Protection Plan). Based on the opinion of the biological experts who

prepared the analysis, the EIR concludes that, with these mitigation measures, the impacts will be reduced to less than significant.

Additionally, this comment states that while Mitigation Measure BIO-22 describes the dimensions of the wildlife corridors, the EIR provides no evidence that maintaining corridors of this width will reduce impacts to less than significant. This comment asks whether the plans have been studied by a qualified biologist and corridors are of adequate dimensions for safe passage of wildlife, and whether there is peer-reviewed literature to support the mitigation measure. Please refer to response to comment I174-3, which raises the same issue raised in this comment with respect to the internal wildlife corridor (Primary 2) and with respect to the qualifications of the wildlife biologist involved in designing and evaluating the corridors.

With respect to the western and northern eastern corridors that provide for regional wildlife movement and habitat connectivity, the Habitat Preserve abuts extensive preserved open space to the west and north. As such, the regional wildlife corridors are functionally much broader than just the corridor widths within the Habitat Preserve on the project site, as illustrated on Figure 4.3-10, Regional Wildlife Corridors. The Habitat Preserve, along the western and northern boundary therefore contributes to the regional wildlife movement

and habitat connectivity within approximately 5 miles of the project site, including Goodan Ranch/Sycamore Canyon County Preserve to the north, San Diego County open space to the east, and MCAS Miramar open space to west. From regional perspective, the proposed project would not substantially constrain wildlife movement and habitat connectivity.

**I174-10:** This comment asks whether there will be mitigation for edge effects to biological resources and the “manufactured” interior wildlife corridor’s proximity to residential communities. Please refer to response to comment I174-9, which raises the same issue raised in this comment with respect to edge effects.

**I174-11:** This comment states that Streets “V” and “W” are dangerous component for wildlife, and asserts that provisions for traffic-calming are not sufficient for wildlife safety and that Mitigation Measure BIO-20 would not reduce impacts to less than significant. This comment asks whether a motion sensor light could warn drivers of approaching wildlife, whether there other safety measures beyond speed bumps and signs to reduce impacts, and whether there are landscaping or design elements to encourage wildlife crossings in specific planned areas. Please refer to response to comment I174-7, which raises the same issue raised in this comment with respect to mitigation to reduce impacts to wildlife movement across Streets “V” and “W.”

With respect to motion sensors, many studies have employed aspects of technology (primarily wildlife cameras) to study wildlife patterns around infrastructure such as roadways, potential undercrossings, and rail systems. Huijser and McGowen (2003) reviewed 27 locations in the United States and Europe where animal-triggered motion sensors deployed warnings to drivers. These were primarily targeted for large ungulates and had widely varying coverage areas and were installed along large highway systems, not within neighborhoods. In order to deploy these effectively a broad array of sensors would need to be deployed, which would cause their own additional landscape impacts. These systems frequently experienced false positives, false negatives, and maintenance issues. Further, there are noted limitations regarding the size of species that can be reasonably detected for collision avoidance. While the concept seems reasonable, it is expected that it would be a technical challenge to implement a reliable system that helped protect a broad array of species while producing few false positives or negatives. While such a system may detect direct in-line movement of larger species across roadways, such as mountain lion, mule deer, bobcat, and coyote, it is hard to conceive of a system that would work with smaller, slower and more erratically moving species, such as small mammals, reptiles, and amphibians, that are the most vulnerable to vehicle collisions. With a 25 mile-

per-hour speed limit and other traffic-calming measures, the risk of collisions will already be reduced, so it is unlikely that any kind motion detection system will substantially contribute to further reduction.

No additional landscaping or design elements to encourage wildlife crossings in specific planned areas of Streets “V” and “W” are proposed as mitigation. As noted, larger and medium-sized wildlife are expected to primarily be active around the streets during the evening and night periods when vehicle use is greatly reduced, thus placing them at less risk. Lighting has been reduced to novel emergency push-button activated and timed lighting within the day-use only preserve. The roads have been designed to be as narrow as possible and as natural as possible with colored bedding to match the surroundings, rolled curbs, and minimal vegetation. Fencing and undercrossings would likely do little to protect smaller wildlife species during the day as they would likely cross the road through the fencing at will.

**I174-12:** This comment states that Mitigation Measure BIO-23 for the wildlife undercrossing of the Cuyamaca Street extension does not provide any evidence this mitigation will be effective in reducing impacts to wildlife movement. This comment asks whether Mitigation Measure BIO-23 will be updated with data to support the conclusion that the undercrossing will reduce impacts to wildlife movement.



It is not standard CEQA practice to include data in the text of mitigation measure to support the efficacy of the mitigation measure. The data to support a mitigation measure is generally provided in the discussion of mitigation measures in the EIR or supporting technical reports such as the Biological Resources Technical Report. Nonetheless, as stated in Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife, the wildlife crossing would be adequate to convey wildlife species using the existing or manufactured topography because it is consistent with the literature suggested openness ratio for mule deer and other species documented during camera studies to be using the project site. See response to comment I174-8.

**I174-13:** This comment references Mitigation Measure BIO-20 and makes the following recommendations: the term “during construction” should be removed, and the measures should implemented indefinitely for wildlife protection; and Measure 1 should include “when fencing is erected, it is wildlife safe that will prevent unnecessary snaring, or injuring wildlife.”

The City agrees with the request that the term “during construction” will be removed from Mitigation Measure BIO-20, because it was not intended to be applicable to construction since the measures within it apply to permanent aspects of the proposed project. Additionally, the City agrees

with the request to revise the measure to include wildlife safe fencing. Therefore, this measure in Section 4.3.5.1, Threshold 1: Candidate, Sensitive, or Special-Status Species, has been revised to state the following:

**BIO-20: Wildlife Protection.** In order to generally protect wildlife species and habitat, the following measures shall be implemented ~~during construction~~:

1. Adequate fencing (i.e., wildlife safe that would prevent unnecessary snaring or injury) shall be erected to guide human users away from open space areas where open space abuts roads, parks, and trails. ~~Fencing locations shall be shown on the Construction Plans.~~
2. Covenants, Conditions, and Restrictions shall include a section that forbids collection of native wildlife (e.g., coast horned lizards, toads, snakes) without obtaining the necessary collection permits from California Department of Fish and Wildlife or the destroying of wildlife habitat.
3. Covenants, Conditions, and Restrictions shall include a notice describing the necessary role that coyotes, bobcats, and rattlesnakes have in the environment and shall make recommendations for keeping pets and pet food indoors and safe, and restrictions against controlling these and other native species unless there is a threat to life or property. The Preserve Manager's phone number

and email address shall be provided for residents to call when they feel threatened by wildlife or observe injured wildlife.

4. Covenants, Conditions, and Restrictions shall include a notice describing the trail and preserve restrictions . . . .

- I174-14

Measure 2 should include the forbiddance of intentionally destroying wildlife habitat. Measure 3 should include wildlife organization phone numbers for residents to call when they feel threatened by wildlife or observe injured wildlife to promote safety for residents and wildlife. Measure 4 should include an enforcement mechanism to protect the trails and preserves. Measure 5 should include a mandate for 15 mph speed limit when driving near wildlife corridors. **Will Mitigation Measure BIO-20 be updated to include these concerns?**
- I174-15

In Section 4.3.6 Cumulative Impacts and Mitigation Measures, there is an important exclusion. As noted in this DEIR by evaluating local and regional wildlife corridors was to access the degree to how the project site functions as a regional wildlife corridor and to adjacent lands to the project site. As to that purpose, this topic should be analyzed in the Cumulative Impacts Section. **Will this DEIR be updated with a section for Wildlife Corridors in the Cumulative Impacts Section?**
- I174-16

Quino checkerspot butterfly is a special-status invertebrate and a Draft Santee IMSCP Subarea Plan Covered Species. Threshold 1 identifies impacts to this species, which mitigation is not adequate to lower to Less than Significant. It is stated in the DEIR that Suitable habitat for the Quino checkerspot butterfly would be directly impacted by project implementation. Mitigation measure BIO-1 would conserve suitable habitat. BIO-18 would restore suitable habitat. These mitigation measures fail to lessen the severe impacts to the Quino Checkerspot butterfly. **Will the impacts in Threshold 1 be updated to Significant and Unavoidable?**
- I174-17

Thanks for the opportunity to comment on the Fanita Ranch RDEIR. I look forward to your reply and making positive steps to protect the regions wildlife and habitat.

Regards,  
John Riedel

**I174-14:** This comment makes the following recommendations: Measure 2 should forbid intentionally destroying wildlife habitat; Measure 3 should include wildlife organization numbers that residents may call when they feel threatened by wildlife or observe injured wildlife; Measure 4 should include an enforcement mechanism to protect trails and preserves; and Measure 5 should include a mandate for a 15 mile-per-hour speed limit when driving near wildlife corridors. This comment asks whether Mitigation Measure BIO-20 will be updated to address these concerns. The City agrees with the request to revise the measure to include intentional destruction of wildlife habitat, and the phone number of the Preserve Manager. As for the requested revision for measures to protect the Preserve, the Preserve Management Plan (Appendix P of the BTR (Appendix D of the EIR)) already addresses this issue. (See Preserve Management Plan, Sections 4.4.1, 4.4.2.4, and 4.4.2.6 to 4.4.2.8.) As for the commenter’s requested revision to the speed limit, the City considers 25 miles per hour to be appropriate, and the no revision is necessary. Please refer to response to comment I174-13 for revisions to Mitigation Measure BIO-20.

**I174-15:** This comment states that the evaluation of regional and local wildlife corridors should be added to the Cumulative Effects section. Please see Section 4.3.5.4, Threshold 4: Native Resident or Migratory Fish and or Wildlife, for the

cumulative impact analysis of regional and local wildlife corridors.

**I174-16:** This comment expresses the opinion of the commenter that Mitigation Measure BIO-1 and Mitigation Measure BIO-18 fail to lessen the severe impacts to Quino checkerspot butterfly. This comment asks whether impacts in Threshold 1 will be updated to significant and unavoidable.

The City disagrees that impacts in Threshold 1 should be updated to significant and unavoidable. The EIR identifies potentially significant impacts and provides several mitigation measures to reduce these potential impacts to less than significant. As stated in Table 4.3-8a, impacts to Quino checkerspot butterfly would be reduced to less than significant through the proposed project's on-site Habitat Preserve, outlined in Mitigation Measure BIO-1, which would conserve 1,096.57 acres of suitable habitat, and Mitigation Measure BIO-18, which would restore/enhance suitable habitat within temporary impact areas and through habitat management, including success criteria, specifically for this species. Impacts in Threshold 1 would be reduced to less than significant with implementation of mitigation under CEQA. Please refer to Thematic Response – Quino Checkerspot Butterfly. The comment does not provide further clarification regarding why the commenter does not believe the mitigation measure would reduce impacts to less than significant; therefore, no more detailed response can be provided. Nonetheless, the City disagrees with this

comment. Based on the opinion of the biological experts who prepared the analysis, the EIR concludes that, with the recommended mitigation, impacts to Quino checkerspot butterfly would be less than significant.

**1174-17:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

### References

- Clevenger, A.P. and N. Waltho. 2000. "Factors Influencing the Effectiveness of Wildlife Underpasses in Banff National Park, Alberta, Canada." *Conservation Biology* 14: 47–56.
- Clevenger, A.P. and N. Waltho. 2003. Performance indices to identify attributes of highway crossing structures facilitating movement of large mammals. *Biological Conservation* 121 (2005) 453-464.
- Donaldson, B.M. 2005. The Use of Highway Underpasses by Large Mammals in Virginia and Factors Influencing Their Effectiveness. Virginia Transportation Research Council, Charlottesville, VA, VTRC 06-R2.
- Ogden. 1992. Baldwin Otay Ranch Wildlife Corridor Studies. Prepared for Otay Ranch Project Team, 146 pp.
- Reed, D.F., T.N. Woodward, and T.M. Pojar. 1975. "Behavioral Response of Mule Deer to a Highway Underpass." *Journal of Wildlife Management* 39: 361–367.

## Comment Letter I175: Keith Rizzo, July 13, 2020

**I175**

**I175-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Keith Rizzo <user@votervoices.net>  
**Sent:** Monday, July 13, 2020 2:05 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

I am a former Santee resident because when my family grew and wanted move up housing, none was available because Fanita Ranch had already been delayed for years. We were forced to move to an adjacent community due to the lack of available housing options that the community needed then, and still needs now. There is no questioning that we all love open space and the hills around Santee. Fanita Ranch will leave over 3/4 of the property as open space. Currently, this property has zero open space. It is private property and not legally accessible to any one who would like to enjoy it. 75% versus 0%, that's an easy choice to make. The EIR covers everything and then some that the opponents of the project view as detrimental. Traffic will continue to worsen and Fanita Ranch is the only project that is willing to tackle this issue head on. The project will bring much needed revenue to the city along with many amenities that all in the area will benefit from. Please approve the current EIR and get this project going. It has been delayed long enough. Thank you for your time.

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I175-1

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Keith Rizzo  
12376 Lakeside Ave  
Lakeside, CA 92040  
ehillsrizzos@sbcglobal.net

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## Comment Letter I176: Cindi Robertson, July 13, 2020

**I176**

**I176-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Cindi Robertson <cindirobotson13@gmail.com>  
**Sent:** Monday, July 13, 2020 8:19 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I176-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Cindi Robertson  
1515 River Dance Ct  
Alpine, CA 91901  
cindirobotson13@gmail.com

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## Comment Letter I177: Marge Saberg, July 13, 2020

**I177**

**I177-1:** This comment generally opposes the proposed project and presumes that a vote will occur on the addition of 3,000 homes to the City of Santee. The comment points to traffic on State Route 52 and during rush hour and states that 3,000 homes is not “moderate” growth. The comment suggests that roads, schools, fire/police, and evacuation plans are “ready first.”

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**From:** MARGE SABERG <margesaberg@sbcglobal.net>  
**Sent:** Monday, July 13, 2020 10:29 AM  
**To:** Chris Jacobs  
**Subject:** 3000 home and insufficient resources

I gather you will be voting on the addition of 3000 homes to Santee. Please a NO !

Have you been to Vons on the weekend lately? ON 52 during rush hour? CoVid won't last forever with our temporary traffic respite with unemployed.

I177-1

Please temper your decision with the realities of excess growth. I get that moderate growth is inevitable and may improve the economy. 3000 home is not what I'd consider "moderate" in our town already of 55000plus. Get the roads, schools, fire/police, evacuation plans at the ready first might be the better plan.

Thank you for your consideration.

Section 4.13, Population and Housing, in the EIR analyzes the inducement of population growth and displacement of people or housing and concludes that impacts from the proposed project would be less than significant.

Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project, and identified feasible mitigation measures to reduce the impacts to transportation; although not all impacts would be

reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.14, Public Services, analyzed the proposed project's potential impacts to fire protection services, police protection services, public school facilities, and libraries, and found the proposed project would result in less than significant impacts on these facilities. This issue is adequately addressed in the EIR.

Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires and evacuation that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety and evacuation. This issue is adequately addressed in the EIR.

## Comment Letter I178: Robert Schick, July 13, 2020

I178

**I178-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Robert Schick <user@votervoices.net>  
**Sent:** Monday, July 13, 2020 1:30 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I178-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Robert Schick  
10444 Healy St  
Santee, CA 92071  
robsurfin@yahoo.com

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## Comment Letter I179: Lori Scribner, July 13, 2020

**I179**

**I179-1:** This comment is an introduction to the comment letter and states their concerns with traffic increasing carbon dioxide emissions and degrading quality of life.

**From:** Lori Scribner <lori@scribnercomm.com>  
**Sent:** Monday, July 13, 2020 7:30 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch- Questions/Concerns

Hi Chris:

I179-1 I'm a 15 year resident of Santee with many concerns about the Fanita Ranch project. My top concern is traffic, which will increase CO2 emissions, and degrade the general quality of life. Along with that, this project has been trying to get rammed through in Santee for years. This is a project that many Santeecans do not want for the reasons I stated above.

I179-2 Questions for you based on your DEIR:

I179-3 How are you meeting the requirements of the County Climate Action Plan with this project, or will you?

I179-4 Why are you not waiting for Santee residents to vote on our General Plan Initiative, which would give us a voice and say over developments. Are you trying to supereede the will of the voters? Fanita Ranch exceeds the limits of the Santee General Plan, are you prepared to be tied up in court for years because of this?

I179-5 How will you mitigate traffic, which in normal times is backed up for 20 minutes or more on West Hills Parkway, to get to the 52? And no, widening the 52 isn't a viable option, you know that will take years and years. Sorry.

I179-6 How can you justify this project which borders wildland areas in Santee when you know we're prone to fires? What's your plan if homeowners are not able to secure homeowners insurance for fire damage?

I179-7 What about fire evacuation plans? As you know, we are "boxed in" in Santee, with federal land to the north and Mission Trails to the south, we have very few escape routes. This is a recipe for disaster, destruction and death. What's your plan?

I179-8 Our water from the Padre Dam Water Authority is very expensive. How will this project lead to price increases? Beyond that, we are in a constant state of drought. How do you justify this massive project? Will we face water shortages because of it?

I179-9 I am very concerned about the destruction of the wildlands that Fanita Ranch will destroy, including chaparral decimation, destruction of vernal pools and the impact on wildlife in the area. What gives you the authority to destroy the lands, including the archeological heritage found there, including Kumeyaay grinding stones. The project will destroy all of these things, has anyone besides Councilman Houlihan, HomeFed, or anyone else involved in this project actually considered that there may be more important things than money?

I'll end this email with a quote from a recent newspaper article on this project:

I179-10 "The General Plan Protection Initiative that would enable citizens to vote on whether they want Fanita Ranch, a project that vastly exceeds size parameters set forth in the Santee General Plan. Unfortunately the Santee City Council, most of whose members are more beholden to the Building Industry Association than their own citizens, used a "study" to delay the Initiative vote from 2018 until November of 2020, thus providing opportunity for a contested "approval" of the megaproject ahead of the Initiative vote."

Thanks for the answers to my questions. If you have any questions for me, please let me know.

Sincerely,  
Lori Scribner

Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project, including the cumulative impacts, and identified feasible mitigation measures to reduce the impacts to transportation; although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.2, Air Quality, analyzed the proposed project's impacts on air quality from traffic including potential for the proposed project to conflict or obstruct an applicable air quality plan, cumulative net increases in criteria pollutant emissions, impacts on sensitive receptors, and emission of odors. Mitigation measures have been

identified to reduce air quality impacts but not to below a level of significance. This issue is adequately addressed in the EIR.

- I179-2:** This is an introductory statement for the preceding questions. No further response is required.
- I179-3:** This comment inquires how the proposed project is meeting the requirements of the County's Climate Action Plan (CAP). The proposed project is within the jurisdiction of the City of Santee, not the County of San Diego. Therefore, compliance with the County's CAP is not required; however, compliance with the City's certified CAP, the Sustainable Santee Plan, is required. Section 4.7, Greenhouse Gas Emissions, analyzes the proposed project's consistency with the City's certified CAP. More specifically, Table 4.7-12 details the proposed project's consistency with the Sustainable Santee Plan and where inconsistent, proposes mitigation measures to reduce impacts to a less than significant level. This issue is adequately addressed in the EIR.
- I179-4:** This comment inquires why the project is not waiting for City residents to vote on it and if the project is trying to supersede the will of the voters. Further, this comment asks if the project is will to be tied up in court for years because it exceeds the limits of the Santee General Plan. Section 3.12, Discretionary Actions, acknowledges that a General Plan Amendment would be required for the



proposed project. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations, discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee General Plan as amended. This issue is adequately addressed in the EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

- I179-5:** This comment inquires how traffic would be mitigated and states the widening of SR-52 is not a viable option.

Section 4.16, Transportation, analyzed the impacts of the proposed project on transportation including circulation system performance, vehicle miles traveled, hazard design features, and inadequate emergency access, and identified mitigation measures TRA-1 through TRA-30 and AIR-6 to reduce impacts to the extent feasible in accordance with CEQA Guidelines, Section 15126.4.

- I179-6:** This comment inquires how the proposed project can be justified when it borders wildland areas prone to wildfires and what happens if future homeowners are not able to secure homeowners insurance. Section 4.18, Wildfire, analyzed the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The proposed project would include various fire protection features including fuel management zones and an on-site fire station to lower wildfire ignition risk. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety.

Homeowner's insurance is not an environmental issue that is required to be analyzed under CEQA. This comment is adequately addressed in the EIR.

- I179-7:** This comment inquires about evacuation plans for the proposed project. Section 4.18.5.1, Wildfire, Threshold 1: Emergency Response Plan or Evacuation Plan, analyzes the proposed project's potential impacts on evacuation in the case of a fire. A Wildland Fire Evacuation Plan (Appendix P2) has been prepared for the proposed project and details the routes that could be used for evacuation and provides measures for meeting City and County evacuation requirements. See also Thematic Responses – Evacuation, Fire Ignition and Risk, and Fire Protection and Safety. This issue is adequately addressed in the EIR.
- I179-8:** The comment states the water from PDMWD is very expensive and inquires how this project would lead to price increases. Further, the comment asks how this project is justified and if the City will face water shortages. The water rates from PDMWD does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Section 4.17.5.2, Utilities and Service Systems, Threshold 2: Water Supply Availability, and Appendix O3, Water Supply Assessment, analyzed the water demand of the proposed project and concluded that sufficient water supplies are available to serve the

proposed project and reasonably foreseeable future development to meet the demand in normal, single dry, and multiple dry years. These demand calculations took into account the effects of climate change on water supply, including the rising sea levels and changes in weather events, details of which can be found in Section 4.7, Greenhouse Gas Emissions. This issue is adequately addressed in the EIR.

- I179-9:** This comment is concerned with the destruction of wildlands (habitat and wildlife) and the archaeological heritage of the Kumeyaay on the project site.

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, fully analyzed potential impacts including cumulative impacts to sensitive plants, wildlife, and vegetation communities and habitats. Based on the opinions of the biological experts who prepared the analysis, the EIR concludes impacts to sensitive plants, wildlife, and vegetation communities and habitats would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

In addition, Section 4.4, Cultural and Tribal Cultural Resources, analyzed the impacts of the proposed project on historical resources, archaeological resources, human remains, and tribal cultural resources, including those of the Kumeyaay. While impacts to cultural and tribal

cultural resources would be potentially significant, the proposed project includes adequate mitigation measures to mitigate potentially significant impacts to cultural and tribal cultural resources in accordance with CEQA. This issue is adequately addressed in the EIR.

**I179-10:** This comment states a quote from a recent newspaper article regarding the General Plan protection Initiative and ends with closing remarks. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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## Comment Letter I180: Ryan Short, July 13, 2020

I180

**I180-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Ryan Short <rshort613@gmail.com>  
**Sent:** Monday, July 13, 2020 9:23 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I180-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ryan Short  
7522 Eagle Dr  
Santee, CA 92071  
rshort613@gmail.com

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## Comment Letter I181: Ron Snyder, July 13, 2020

**I181**

**I181-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Ron Snyder <rsnyderlj@gmail.com>  
**Sent:** Monday, July 13, 2020 8:57 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I181-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Ron Snyder  
8790 Granite House Ln  
Santee, CA 92071  
rsnyderlj@gmail.com

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## Comment Letter I182: Loren H. Spector, July 13, 2020

**I182**

**I182-1:**

This comment states the commenter’s concern for the security of their investment in their City of Santee residence and asks if they will be compensated for destruction of views by economic or fire disaster. Section 4.1, Aesthetics, evaluated the proposed project’s impacts on public scenic vistas, scenic highways, visual character and quality, and lighting and glare. Impacts on vistas, views, visual character, and quality, were evaluated through 16 key public vantage points identified around the project site. Impacts were examined from public view points, as CEQA does not apply to private views. The EIR concluded less than significant impacts. Therefore, no further response is required. In addition, Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety or fire disaster. This issue is adequately addressed in the EIR.

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**From:** LOREN SPECTOR <lspector@prodigy.net>  
**Sent:** Monday, July 13, 2020 4:57 PM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch Revised Draft EIR

Dear Chris Jacobs,

I182-1  
1  
Having received an education in economics from the Wharton School along side our illustrious President at the University of Pennsylvania, I have concerns about the security of my investment in my Santee residence. I witnessed the bottom fall out of the Florida housing market as a real estate broker. Many condominium and housing projects were abandoned and fell to disrepair for years. With these unsure economic times, please assure me that my unobstructed view of the Fanita Ranch property will not fall to the same fate. What mitigating factors are in place for this likely occurrence? Will my wife and I be compensated for the destruction of my beautiful view by economic or fire disasters?

Thank you,  
Loren H Spector, Santee Resident  
1966 Graduating Class  
The Wharton School

Sent from [Mail](#) for Windows 10

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## Comment Letter I183: Marvin Tabije, July 13, 2020

I183

**I183-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Marvin Tabije <user@votervoice.net>  
**Sent:** Monday, July 13, 2020 9:50 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I183-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Marvin Tabije  
8430 Buckland St  
La Mesa, CA 91942  
marvin\_tabije@yahoo.com

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## Comment Letter I184: Suzanne Till, July 13, 2020

**I184**

### Comments to Fanita Ranch Draft EIR, July 13, 2020

- I184-1 My name is Suzanne Till. I live at 9342 Goyette Place in Santee, CA 92017. I have completed my master's at SDSU in geography and urban planning, and my Ph.D. in water resources geography at the University of Colorado, Boulder.
- I184-2 On page 4.9-21, the Draft EIR states:  
The City does not rely on groundwater sources for its water supply. The project site would receive Advanced Treated Water from Padre Dam Municipal Water District through its Advanced Water Purification Program, which would provide the proposed project with a local, reliable, and sustainable water supply.
- I184-3 Comment:  
• East County Advanced Water Purification Project (ECAWP). This Draft EIR assumes that the East County Advanced Water Purification Project will be funded and approved to provide water for residents of the proposed Fanita Ranch project. ECAWP has not been completely approved and funded. In fact, on July 13, 2020, Metropolitan Water District of Southern California may have denied funding for ECAWP. The EIR must not assume water will be provided by this project. What other affordable sources of water will be available to Santee residents?  
• San Diego River: This Draft EIR assumes that City residents will not be drawing from groundwater supplies. This statement is false. First, I believe West Hills High School has an active well. In addition, the ECAWP will need further storage for produced repurified water, the most cost-effective storage site is the Santee-El Monte Groundwater Basin beneath the San Diego River. The Draft EIR must address impacts to groundwater resources that may be utilized in the future; especially in times of long-term drought for California's water resources. In essence to keep water supplies flowing and affordable, The San Diego River that flows through Santee, should be preserved for current and future ground water storage needs.
- I184-4
- I184-5 On page 4.17-3, the Draft EIR states:  
Additionally, the SDCWA began operation of the Carlsbad Desalination Plant in late 2015, delivering nearly 50 million gallons per day (mgd) (56,000 AFY) of potable water to its member agencies. As of May 2019, the Carlsbad Desalination Plant received approval to increase the production of potable water from desalination from 50 mgd to 60 mgd (67,000 AFY).
- I184-6 Comment:  
• This statement assumes that Padre Dam MWD ratepayers approve of using potable water from the Carlsbad Desalination Plant. In fact, water rates have been increasing over the past 10 years. Many rate payers are s that Padre Dam find alternative sources of water supplies that are not so expensive as desal water.  
• What is the actual and subsidized cost this water? How long will the subsidies last? What will be the Santee ratepayer rate structure if Padre Dam becomes more reliant on desal water?  
• Water from the Carlsbad Desalination Plant is privately owned by offshore investors. Who are these investors, and can Santee residents rely on these investors to provide clean, safe and affordable water to Santee residents?  
• To bring down costs of water, Padre Dam MWD has been moving forward on the East County Advanced Water Purification Project (ECAWP). This Draft EIR assumes that the East County Advanced Water Purification Project will be funded and approved to provide water for residents of the proposed Fanita Ranch project. ECAWP has not been completely approved and funded.
- I184-7
- I184-8

- I184-1:** This comment provides an introduction to the comment letter. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of information provided in the EIR. Therefore, no further response is required.
- I184-2:** This comment repeats language from Section 4.9, Hydrology and Water Quality, in the EIR verbatim. No further response is required.
- I184-3:** This comment states that the EIR assumes that the East County Advanced Water Purification will be funded and approved to provide water for residents of the proposed project. The comment further states ECAWP has not been completely approved and funded and that the EIR must not assume water would be provided by this project. The comment inquires what other affordable sources of water would be available to City residents. Section 4.17.5.2, Utilities and Service System, Threshold 2: Water Supply Availability, analyzed the proposed project demand on water supply during normal, single dry, and multiple dry years, and found that PDMWD water supplies are sufficiently available through San Diego County Water Authority's accelerated forecast growth component of the 2015 Urban Water Management Plan. The EIR further states that if the ECAWP Project is implemented, based on this projected time frame, the proposed project would be

able to fully use purified water from the ECAWP Project within the 20-year water supply planning horizon and beyond. However, this program would not be necessary for PDMWD to meet the demand associated with the proposed project but could provide an additional supply source for further water supply security to the proposed project and other PDMWD customers if it is implemented. This issue is adequately addressed in the EIR.

- I184-4:** This comment provides the commenter’s opinion that EIR’s assumption that City residents will not be drawing from groundwater is false and that the ECAWP Project would need storage for repurified groundwater. The comment further states that the EIR needs to address impacts to groundwater resources that may be utilized in the future, especially in times of long-term drought for California’s water resources. Section 4.9.5.2, Hydrology and Water Quality, Threshold 2: Groundwater Supplies, addresses the potential impacts of the proposed project on groundwater supplies. The statement referred to in this comment regarding the ECAWP Project: “The project site would receive Advanced Treated Water from Padre Dam Municipal Water District through its Advanced Water Purification Program, which would provide the proposed project with a local, reliable, and sustainable water supply” has been removed from this section in the Final EIR. In addition, no groundwater would be used for project construction or operation, and the proposed project would



be designed to minimize potential effects to groundwater recharge through consolidation of impervious surfaces and the retaining of approximately 2,022.6 acres as Open Space, Habitat Preserve, and Agriculture and Parks. This issue is adequately discussed in the EIR.

- I184-5:** This comment repeats language from the EIR Section, 4.17, Utilities and Service Systems, verbatim. No further response is required.
- I184-6:** This comment inquires what the actual and subsidized cost of the potable water is, how long these subsidies will last, and what the City rate structure would be if PDMWD becomes more reliant on desalinization water. As the water service provider, PDMWD has the authority to set water rates. This is not the responsibility of the City. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.
- I184-7:** This comment states that water from the Carlsbad Desalination Plant is privately owned by offshore investors and inquires who these investors are and if the City residents can rely on these investors to provide clean, safe, and affordable drinking water. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

1184-8 cont.	<p>In fact, on July 13, 2020, Metropolitan Water District of Southern California may have denied funding for ECAWP. The EIR must not assume water will be provided by this project. What other affordable sources of water will be available to Santee residents?</p> <ul style="list-style-type: none"> <li>According to the CA Water Boards website: <a href="#">Water Code as Section 106.3, the state statutorily recognizes that "every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes." The human right to water extends to all Californians, including disadvantaged individuals and groups and communities in rural and urban areas.</a></li> </ul>
1184-9	<ul style="list-style-type: none"> <li>Currently Padre Dam MWD rate structures are not rated as affordable according to CA Water Boards. What will be the rate structure, with new users added? How can families and people on fixed incomes afford this more expensive water. How will City of Santee and Padre Dam MWD, ensure that water for Santee residents will be clean, safe and <u>affordable</u>? How will this project ensure that Santee and Padre Dam are in compliance with Section 106.3 of the CA Water Code?</li> </ul>
1184-10	<p>Thank you for your attention to these important items. Suzanne M. Till, Ph.D.</p>

Platform

**I184-8:** This comment states that the EIR assumes that the ECAWP Project would be fully funded and approved to provide water for residents of the proposed project. It further states the ECAWP Project has not been completed or approved and asks what other sources of water will be available to the City residents. Please refer to response to comment I184-3, which addresses the remainder of issues raised in this comment.

**I184-9:** This comment quotes the California Water Board website and states PDMWD rate structure is not rated as affordable. The comment inquires what the rate structure would be for new users and how water for Santee residents will be clean, safe, and affordable. The comment further ask how the proposed project ensures that Santee and Padre Dam are in compliance with Section 106.3 of the CA Water Code. These comments do not raise significant environmental issues regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required. See also response to comment I184-6.

**I184-10:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

## Comment Letter I185: Diane To, July 13, 2020

**I185**

**I185-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Diane To <todiane@gmail.com>  
**Sent:** Monday, July 13, 2020 9:01 AM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I185-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Diane To  
8430 Buckland St  
La Mesa, CA 91942  
todiane@gmail.com

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## Comment Letter I186: Karen Villedieu, July 13, 2020

**I186**

**I186-1:** This comment letter expresses support for the proposed project and the Draft EIR. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

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**From:** Karen Villedieu <user@votervoice.net>  
**Sent:** Monday, July 13, 2020 12:09 PM  
**To:** Chris Jacobs  
**Subject:** Certify the Fanita Ranch EIR

Dear Principal Planner Jacobs,

Please add my name with those in support of Fanta Ranch and the project's Draft Revised Environment Impact Report. While I'm using a website to share this comment, I am only doing so because it as an easy and quick way to share support, and because there is little for me to add of substance that has not already been fully discussed in the comprehensive EIR.

I strongly support Fanita Ranch and the independent analysis provided in the EIR and its common sense mitigations to avoid any potential impacts.

I186-1 The EIR was also clear in outlining the many benefits for Santee residents, from preserving 76% of the site as open space with trails, parks, farms and vineyards to the project's sustainability with onsite renewable energy generation.

The project will produce \$31 million to improve SR-52, \$10 million to improve city streets, \$20 million for parks and trails, and \$18 million for community services. Fanita will also pay \$160 million in one-time fees, a critical source of funds at a time when they are most needed. And each year they will pay more than \$8 million to the city in taxes and \$9 million to local schools.

The facts are clear, after years of review and conversation this is probably the most studied ground in San Diego County, and now it's time to finally move forward.

Please certify the Draft Revised Environmental Impact Report and approve the Fanita Ranch project.

Sincerely,

Karen villedieu  
9818 Via Leslie  
Santee, CA 92071  
sixisenough1@cox.net

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## Comment Letter I187: Jenilee Villosio, July 13, 2020

**I187**

**I187-1:** This comment states general opposition to the proposed project and is concerned with fire hazards, traffic, loss of natural habitats for wildlife, stolen indigenous Kumeyaay land, and the effects of global warming.

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**From:** Jenilee Villosio <jenileevillosio@gmail.com>  
**Sent:** Monday, July 13, 2020 8:07 AM  
**To:** Chris Jacobs  
**Subject:** No to Fanita Ranch!

To whom it may concern,

My name is Jenilee Villosio and I am a resident of Santee. I would like to express my opinion that I am against the Fanita Ranch project. My main concerns are the additional fire hazards that will no doubt affect these homes and the safety of the community; the impact on traffic that is already heavy during morning and afternoon commutes and most importantly, the loss of natural habitats for wildlife, not to mention that we are living on stolen indigenous land of the Kumeyaay.

I187-1

There are more important things than profits for a few individuals and the problematic, long term effects of this project should be prioritized. With global warming, more heat and more fires are inevitable and by choosing to approve this project, you are allowing people to live in harms way and should feel heavy responsibility for what will likely happen in the future.

Thank you for your time.

Sincerely,  
Jenilee Villosio

Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle,

and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project, including the cumulative impacts, and identified feasible mitigation measures to reduce the impacts to transportation; although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, fully analyzed potential impacts including cumulative impacts to sensitive plants, wildlife, and vegetation communities. The EIR concludes impacts to sensitive plants, wildlife, and vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

Section 4.4, Cultural and Tribal Cultural Resources, analyzed the impacts of the proposed project on historical resources, archaeological resources, human remains, and tribal cultural resources, including those of the Kumeyaay. While impacts to cultural and tribal cultural resources would be potentially significant, the proposed project includes adequate mitigation measures to mitigate potentially significant impacts to cultural and tribal cultural resources in accordance with CEQA. This issue is adequately addressed in the EIR.



Section 4.7, Greenhouse Gas Emissions, analyzed the impacts of construction and operation of the proposed project on greenhouse gas emissions including the generation of greenhouse gas emissions and consistency with an applicable plan. The EIR concluded the proposed project would have a less than significant impacts on greenhouse gas emissions with mitigation incorporated. This issue is adequately addressed in the EIR.

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## Comment Letter I188: Mia Volker, July 13, 2020

**I188**

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**From:** Mia <miaminsd@yahoo.com>  
**Sent:** Monday, July 13, 2020 11:56 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch

Mr. Jacobs,

I188: Fanita Ranch does not follow Santee's general plan and was already voted down by Santee citizens years ago. Since  
1 then, fire danger and traffic are at an all-time high and the cumulative effects of this and other developments are not  
properly mitigable. The checkerspot butterfly and other endangered animals and plants would be destroyed by this  
I188: oversized development. Vistas will be forever gone. Air quality will be worse. Let's plan Santee the right way:  
2 develop the valley, not the natural hillsides. No Fanita Ranch.

Sincerely,

Mia Volker  
Santee City Resident

**I188-1:** This comment states that the proposed project does not follow the Santee General Plan and has already been voted down by City of Santee citizens. Prior votes on past development proposals are not relevant to the current project. The proposed project would include approval of a General Plan Amendment to ensure its consistency with the Santee General Plan. Section 4.10, Land Use and Planning, in the EIR analyzes the proposed project's potential to cause a significant environmental impact due to a conflict with the goals and policies of the Santee General Plan adopted for the purpose of avoiding or mitigating an environmental effect. Specifically, Section 4.10.5.2, Threshold 2: Conflict with Land Use Plans, Policies, or Regulations , discusses the proposed General Plan Amendment, which includes updating the 16 Guiding Principles for the proposed project to better adhere to the current project design. The proposed project's consistency with the proposed revised 13 Guiding Principles is analyzed in Table 4.10-1, Project Consistency with Proposed Guiding Principles for Fanita Ranch. The proposed project's consistency with relevant Santee General Plan goals, objectives, and policies is provided in Table 4.10-2, Project Consistency with Relevant City of Santee Goals, Objectives, and Policies. The EIR concludes that the proposed project would be consistent with the Santee

General Plan as amended. This issue is adequately addressed in the EIR.

- I188-2:** This comment states that fire danger and traffic are at an all-time high and that the cumulative effects of these issues is not properly mitigated. The comment further states that endangered species would be destroyed, vistas would be gone, and air quality would be worse.

Section 4.18, Wildfire, analyzes the potential impacts of increased wildfires that may result from the construction or operation of the proposed project. The majority of the information provided in Section 4.18 is based on information from the Fire Protection Plan and Construction Fire Prevention Plan (2020), which are included as Appendix P1, and the Wildland Fire Evacuation Plan (2020), which is included as Appendix P2, prepared for the proposed project. This section also references information provided in the will-serve letters provided by the Santee Fire Department in Appendix M. The EIR concludes that the proposed project would have a less than significant impact on wildfire safety. This issue is adequately addressed in the EIR.

Section 4.16, Transportation, analyzed the potential for the proposed project to result in impacts to access, circulation, and other transportation modes, including the potential for the proposed project to conflict with a program, plan, ordinance, or policy addressing the

circulation system, including transit, roadway, bicycle, and pedestrian facilities; substantially increase hazards due to a design feature or incompatible use; and result in inadequate emergency access. The EIR analyzed the impacts of the proposed project, including the cumulative impacts, and identified feasible mitigation measures to reduce the impacts to transportation; although not all impacts would be reduced to below a level of significance. This issue is adequately addressed in the EIR.

Section 4.3, Biological Resources, and Appendix D, Biological Technical Report, fully analyzed potential impacts including cumulative impacts to sensitive plants, wildlife, and vegetation communities. The EIR concludes impacts to sensitive plants, wildlife, and vegetation communities would be less than significant with mitigation incorporated. This issue is adequately addressed in the EIR.

Section 4.1, Aesthetics, analyzed the proposed project impacts, including cumulative impacts on scenic vistas by evaluating the proposed project from 16 key vantage points. The EIR concludes less than significant impacts from development of the proposed project on scenic vistas. This issue is adequately addressed in the EIR.

Section 4.2, Air Quality, analyzed the proposed project's impacts on air quality including potential for the

proposed project to conflict or obstruct an applicable air quality plan, cumulative net increases in criteria pollutant emissions, impacts on sensitive receptors, and emission of odors. Mitigation measures have been identified to reduce air quality impacts but not to below a level of significance. This issue is adequately addressed in the EIR.

## Comment Letter I189: Elizabeth Walk, July 13, 2020

**I189**

**From:** Elizabeth Walk <liz.walk@cox.net>  
**Sent:** Monday, July 13, 2020 11:44 AM  
**To:** Chris Jacobs  
**Subject:** Fanita Ranch DEIR

Dear Mr. Jacobs,

I189-1 I'm a 16-year resident of Santee who has been following the story of the Fanita Ranch property since Barratt was the developer. This latest iteration has so many planned dwellings that it can't help but change the entire character of Santee, so it's caused me to take notice. One of the reasons I moved to Santee was its semi-rural environment with Mission Trails Regional Park as the main attraction. I treasure MTRP as a habitat preserve and a place for recreation. So, of course, I'm interested in any environmental impacts to the surrounding ecology, especially in regards to waters that flow into our creeks and rivers and the ever-present threat of wildfires caused by human activities. I'm a layperson with no prior experience of trying to interpret this type of document.

I189-2 I've been looking at the Utilities section of the DEIR because I'm interested in how our city and our region plans to deal with water usage and conservation issues, as well as the problem of runoff. I saw the tables projecting water usage through 2040, termed "the foreseeable future" in the report. Considering that the Fanita Ranch project will likely take 10-15 years to fully build out as it is currently proposed, this projection seems inadequate. As climate change makes frequent drought years more likely, it is surprising to a lay person like myself that this short forecast window is considered acceptable. Is this a standard projection timeframe? Additionally, I don't understand how it will be determined if the project runoff will have an adverse effect on surface or groundwater quality. Are there baseline analyses for comparison?

I189-4 Of course I am also concerned about wildfires, since much of that area burned in 2003, and we know that the occurrence of wildfires is a certainty in our area. I saw that the Magnolia connector isn't slated to be completed until 1500 units have sold. This appears to mean that there will be a period of years when all construction traffic and residents will have to use Fanita Parkway as their only evacuation route. How will the City prepare the residents for such an eventuality? How will the planned traffic calming features impact evacuation once the project is built out?

I189-5 Also, during construction, especially before water systems are operational, will there be adequate escape routes for construction personnel? Is the city liable in any way if it is found that water delivery systems or escape routes were not adequate in the event of another firestorm during construction?

I189-5 I appreciate your attention to my concerns.

Sincerely,  
 Elizabeth Walk

**I189-1:** This comment states that the commenter has followed the proposed project since it was the Barratt Plan and is interested in any of the environmental impacts to the surrounding ecology, creeks and rivers, and wildfires. This comment does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.

**I189-2:** This comment states projections for water usage through 2040 stated in the EIR seem inadequate due to increasing drought years from climate change and asks if this is a standard projection timeframe. Section 4.17, Utilities and Service Systems, specifically Section 4.17.5.2, Threshold 2: Water Supply Availability, and Appendix O3, Water Supply Assessment, analyzed the water demand of the proposed project and concluded that sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development to meet the demand in normal, single dry, and multiple dry years. These demand calculations took into account the effects of climate change on water supply, including the rising sea levels and changes in weather events, details of which can be found in Section 4.7, Greenhouse Gas Emissions. The Water Supply Assessment was prepared in accordance with Senate Bill

610, which sets the requirements for water supply assessments for new development under CEQA, and requires that projects evaluate water supply during a 20-year projection to meet existing and planned future demands. Therefore, the proposed project analyzed water demand through the planning horizon year 2040, in compliance with applicable regulations.

- I189-3:** This comment inquires how it would be determined if project runoff would have an adverse effect on surface or groundwater quality and if there are baseline analyses for comparison. Section 4.9, Hydrology and Water Quality, and Appendices J1 through J7, address the potential hydrology and water quality impacts including the proposed project's potential effects on surface and groundwater quality. As analyzed in Section 4.9.5.1 Threshold 1: Water Quality Standards, the project would be required to prepare and comply with the Stormwater Pollution Prevention Plan, implement best management practices, and comply with existing federal, state, and local regulations to protect water quality and decrease the amount pollution entering receiving waters from project implementation. These analyses were prepared by comparing the existing hydrologic condition with conditions during project construction and project operation. Therefore, this issue is adequately addressed in the EIR.



**I189-4:** This comment states they are concerned about wildfires and state that the Magnolia connector would not be built until the 1,500th dwelling unit is sold meaning all construction traffic would have to use Fanita Parkway. In addition, this comment inquires how traffic calming features would impacts evacuation once the project is built out and if there would be adequate escape routes for construction personnel. Finally, this comment asks if the City is liable if it is found that water delivery systems or escape routes were not adequate in the event of a firestorm. According to Section 4.16, Transportation, Magnolia Avenue would be extended prior to certificate of occupancy of the 1,500<sup>th</sup> equivalent dwelling unit. Until this threshold is reached, construction traffic would utilize both Fanita Parkway and Cuyamaca Street. Section 4.18, Wildfire, analyzed the potential impacts of wildfire and adequacy of routes in the event of an evacuation. As required by the Santee Fire Department, the proposed project has prepared new evacuation and emergency response plans, including a Fire Protection Plan (Appendix P1), Construction Fire Protection Plan (Appendix P1), and Wildland Evacuation Plan (Appendix P2), and would provide proper fire protection measures and plans for meeting City and County fire and building codes, including access requirements both during construction and operation of the proposed project. Therefore, this issue is adequately addressed in the EIR.

**I189-5:** This is a closing comment and does not raise a significant environmental issue regarding the adequacy or accuracy of the information provided in the EIR. Therefore, no further response is required.