

VOLUME I

Santee Town Center Specific  
Plan Update

Final Environmental Impact Report

SCH# 2023090032

February 2025

*Prepared for:*



**City of Santee Planning &  
Building Department**  
10601 Magnolia Ave.  
Santee, CA 92071

*Prepared by:*

**HELIX Environmental Planning, Inc.**  
7578 El Cajon Boulevard  
La Mesa, CA 91942

This page intentionally left blank

# Table of Contents

---

<b><u>Section</u></b>	<b><u>Page</u></b>
<b>1.0 INTRODUCTION .....</b>	<b>1-1</b>
1.1 Content and Format .....	1-1
1.2 Public Review of the Draft EIR .....	1-1
1.3 Point of Contact .....	1-2
<b>2.0 RESPONSE TO COMMENTS .....</b>	<b>2-1</b>
2.1 List of Persons, Organizations, and Public Agencies Commenting on the Draft EIR .....	2-2
2.2 Responses to Comments .....	2-2
<b>3.0 DRAFT EIR CLARIFICATIONS AND REVISIONS .....</b>	<b>3-1</b>
<b>4.0 Mitigation Monitoring and Reporting Program .....</b>	<b>4-1</b>
4.1 Introduction .....	4-1
4.2 Mitigation Monitoring and Responsibilities .....	4-1

## LIST OF TABLES

<b><u>No.</u></b>	<b><u>Title</u></b>	<b><u>Page</u></b>
4-1	Mitigation Monitoring and Reporting Program .....	4-2

This page intentionally left blank



## Acronyms and Abbreviations

---

ALUC	Airport Land Use Commission
CEQA	California Environmental Quality Act
City	City of Santee
County	San Diego County
EIR	Environmental Impact Report
MM	mitigation measures
MMRP	Mitigation Monitoring and Reporting Program
NOA	Notice of Availability
NOC	Notice of Completion
PDMWD Project	Padre Dam Municipal Water District ( Santee Town Center Specific Plan
SCH	State Clearinghouse
TCSP	Town Center Specific Plan

This page intentionally left blank

## 1.0 Introduction

In accordance with Section 15088 of the Guidelines for Implementation of the California Environmental Quality Act (State CEQA Guidelines), the City of Santee (City), as the Lead Agency under the California Environmental Quality Act (CEQA), has evaluated the comments received on the Draft Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2023090032) for the proposed Santee Town Center Specific Plan (Project) and has prepared this Final EIR with written responses to these comments. This Final EIR has been prepared in accordance with CEQA and represents the independent judgment of the City as the Lead Agency.

According to State CEQA Guidelines Section 15132, the Final EIR shall consist of:

- (a) The draft EIR or a revision of the draft;
- (b) Comments and recommendations received on the draft EIR either verbatim or in summary;
- (c) A list of persons, organizations, and public agencies commenting on the draft EIR;
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- (e) Any other information added by the Lead Agency.

The purpose of the Final EIR is to respond to all comments received by the City regarding the environmental information and analyses contained in the Draft EIR. Additionally, any clarifications or revisions to the Draft EIR generated from responses to comments are stated in the Final EIR, which includes the Draft EIR, as modified per the clarifications and revisions presented in Section 3.0 of this document.

In addition to the Final EIR (including supporting technical appendices), the City will also consider the adoption of a Mitigation Monitoring and Reporting Plan (MMRP), a Findings of Fact and Statement of Overriding Considerations document, staff reports, and Resolutions as part of the approval process for the project.

## 1.1 Content and Format

This Final EIR includes three volumes. This introductory section is Section 1 of Volume I. Section 2, Response to Comments, contains a copy of the comment letters received by the City regarding the Draft EIR, along with annotated responses to each comment contained within the letters. Section 3, Draft EIR Clarifications and Revisions, contains clarifications/revisions to the Draft EIR. Section 4, MMRP, contains the MMRP for the project. Volume II includes the entirety of the Draft EIR with revisions in strikeout underline (Revised Draft EIR). Volume III includes the EIR appendices.

## 1.2 Public Review of the Draft EIR

As required by Section 15087 of the State CEQA Guidelines, a Notice of Completion (NOC) and a Notice of Availability (NOA) of the Draft EIR for the Project were filed with the State Clearinghouse on August 30, 2024, and the NOA of the Draft EIR was also filed with the San Diego County Clerk. The Draft EIR was circulated for public review for a minimum of 45 days,

from August 30, 2024 to October 14, 2024. The NOA, NOC, and the Draft EIR and supporting technical appendices were also posted on the SCH CEQANet Web Portal, and the NOA was sent to responsible agencies and other interested agencies and parties on or about August 30, 2024. Copies of the Draft EIR were also made available for public review at the City Department of Development Services (Building 4), the City's Clerk's Office (Building 3), the Santee County Library, and on the City's website. Nine comment letters were received by the City during the Draft EIR public review period. The comment letters are addressed in Section 2 of this Final EIR.

### **1.3 Point of Contact**

The Lead Agency for the proposed Project is the City. Any questions or comments regarding the preparation of this document, its assumptions, or its conclusions, should be referred to:

Sandi Sawa, AICP, Director  
Planning & Building Department  
10601 Magnolia Ave.  
Santee, CA 92071  
Phone: (619) 258-4100 ext. 167 • e-mail: [ssawa@cityofsantee.ca.gov](mailto:ssawa@cityofsantee.ca.gov)

## 2.0 Response To Comments

Nine comment letters were received by the City during the Draft EIR public review period. Responses to those comments that address environmental concerns have been thoroughly addressed in this section of the Final EIR. Comments that do not require a response, pursuant to Section 15088(a) of the State CEQA Guidelines, include those that (1) do not address the adequacy or completeness of the Draft EIR; (2) do not raise environmental issues; or (3) do request the incorporation of additional information not relevant to environmental issues.

Section 15088 of the State CEQA Guidelines states:

- a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- c) The written responses shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail, giving the reasons that specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in the responses. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refers to readily available information, or does not explain the relevance of evidence submitted with the comment.
- d) The responses to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the responses to comments make important changes in the information contained in the text of the draft EIR, the lead agency should either:
  1. Revise the text in the body of the EIR; or
  2. Include marginal notes showing that the information is revised in the responses to comments.

Revisions to the Draft EIR have been prepared to make minor corrections and clarifications to the Draft EIR as a result of comments received during the public review period (refer to Section 3.0, Draft EIR Clarifications and Revisions, of this document as well as Volume II, Revised Draft EIR). Therefore, this Response to Comments section, along with the Draft EIR Revisions and MMRP, are included as part of this Final EIR along with the Draft EIR for consideration by the City prior to a vote to certify the Final EIR.

## 2.1 List of Persons, Organizations, and Public Agencies Commenting on the Draft EIR

In accordance with Section 15132 of the State CEQA Guidelines, the agencies, organizations, and individuals that submitted comments regarding the Draft EIR through the end of the public review period (October 14, 2024) are listed below:

Comment Letter	Name/Agency	Date
A	California Department of Transportation (Caltrans) Local Development Review	October 9, 2024
B	Airport Land Use Commission (ALUC) San Diego County Regional Airport Authority (SDCRAA)	October 10, 2024
C	United States Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (USFWS)	October 11, 2024
D	County of San Diego Public Works - County Airports	October 11, 2024
E	San Diego County Archaeological Society, Inc. Environmental Review Committee	October 11, 2024
F	County of San Diego General Services - Asset Management Division	October 14, 2024
G	California Department of Transportation (Caltrans) Division of Aeronautics	October 14, 2024
H	Padre Dam Municipal Water District (PDMWD) – Planning and Engineering	October 14, 2024
I	Del Hanson	September 11, 2024

## 2.2 Responses to Comments

Individual comments within the body of the comment letter have been identified and numbered. A copy of the comment letter and the City's responses to each comment are included in this section. Brackets delineating the individual comments and a numeric identifier have been added to the right margin of the letter. Responses to each comment identified are included on the page(s) facing the applicable comment.

LETTER A

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



October 9, 2024

11-SD-52, 67  
PM VAR  
Santee Town Center Specific Plan Update  
DEIR/SCH# 2023090032

Mr. Michael Coyne  
Principal Planner  
City of Santee  
Department of Development Services  
10601 Magnolia Avenue  
Santee, CA 92701

Dear Mr. Coyne:

A-1

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process of the Draft Environmental Impact Report (DEIR) for the Town Center Specific Plan (TCSP) Update, located near State Routes 52 (SR-52) and 67 (SR-67), in the city of Santee. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve. We look forward to working with the City of Santee in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections

\*Provide a safe and reliable transportation network that serves all people and respects the environment\*

A-1. This comment is introductory in nature and describes the project and Caltrans' role. No environmental issues are raised by this comment and no further response is required.

Mr. Michael Coyne, Principal Planner  
 October 9, 2024  
 Page 2

A-1 (cont.) between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

**Traffic Engineering and Analysis**

- A-2 • The Draft Environmental Impact Report should include language that proposed developments may require a safety review that follows the Caltrans "[Local Development Review \(LDR\) Safety Review Practitioner's Guidance](#)". Please see attached.
- A-3 • The Draft EIR shows that this Santee Town Center Specific Plan update does exceed the Vehicle Miles Traveled (VMT) Significance Thresholds:
  - The Residential Uses VMT/Capita exceed the threshold. Therefore, would have a significant VMT Impact.
  - The TCSP Area and Housing Elements Sites 20A and 20B: "While MM-TRA-1 would minimize VMT impacts associated with future development, impacts would not be fully mitigated. Therefore, impacts associated with VMT would remain significant and unavoidable."
  - "Development of Housing Element sites 16A, 16B, 20A, and 20B may require improvements to the existing roadway network at the time plans are prepared for their development."
  - "Which could affect emergency access."
- A-4 • The Santee TCSP Update property developments 20A and 20B are approximately one-half mile away from the SR-67 ramps at Woodside Avenue and the property developments 16A and 16B are approximately 2 miles away from the SR-67 ramps at Woodside Ave. Therefore, once these properties developments begin a VMT analysis will be required to check for impacts at the SR-67 ramps, such as queuing during peak hours and the safety impacts these will create on SR-67 mainlines.
- A-5 • There is a City of Santee approved 2017 Capital Improvement Program that included the Roundabout project at Woodside Avenue and SR-67 southbound exit ramp designed by the City of Santee.
  - The "City of Santee Mobility Element" report that states "Policy 3.5: The City shall encourage the use of innovative methods for traffic control (such as roundabouts, curb extensions, and traffic circles) where appropriate that add character, slow vehicle speeds, and create opportunity for improved aesthetics while effectively managing traffic."
  - There was a Cooperative Agreement 11-8446 and Permit Engineering Evaluation Report (PEER) document with Caltrans and the City of Santee for the proposed Roundabout project at Woodside Avenue and SR-67 southbound exit ramp

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A-2. This comment requests that the Final EIR include language that proposed development may require a safety review that follows the Caltrans Local Development Review (LDR) Safety Review Practitioner's Guide. This response acknowledges as part of the Final EIR that proposed development may require a safety review that follows Caltrans LDR Safety Review Practitioner's Guide and no changes in the Draft EIR are necessary.

A-3. This comment summarizes the Draft EIR's details regarding significant VMT impacts and impacts to emergency access and is related to comment A-4. No further response is required.

A-4. This comment states that once development begins, a VMT analysis will be required for the Housing Element sites to analyze impacts related to queuing during peak hours at SR-67 ramps at Woodside Avenue and safety impacts on SR-67 mainlines. The City agrees that future development for the Housing Element sites must be in accordance with the City of Santee's VMT Analysis Guidelines (April 13, 2022). Future developments will also be required to determine their effects on transportation congestion and queuing based on standards and methods outlined in the Guidelines for Transportation Impacts in the San Diego Region (May 2019, ITE).

A-5. This comment references a roundabout project identified in the City's Capital Improvement Program (CIP) identified at Woodside Avenue and SR-67 southbound exit ramp and recommends it be included as part of the project and part of the VMT mitigation. A reference is included to the City's Mobility Element Policy 3.5 regarding traffic control methods. Regarding Mobility Element Policy 3.5, multimodal and traffic calming features are included as part of the project on surrounding roadways, such as Town Center Drive and Riverview Parkway. However, the SR-67 and Woodside Avenue Roundabout Project was removed from the City's CIP in 2023 as part of an update to the CIP and will not be included as mitigation for the project. Project level analyses will be required for future developments at the Housing Element sites as noted in the response for A-4 above. No changes to the mitigation measures in the Draft EIR are necessary.



Mr. Michael Coyne, Principal Planner  
October 9, 2024  
Page 3

- A-5 (cont.) designed by the City of Santee. Caltrans recommends this project be included in the Santee TCSP Update DEIR and part of the VMT mitigation.
- A-6
- Section 4.16.6.3 Significance After Mitigation, indicates: "At a program level of review with no specific development proposals available for review, it is not guaranteed that each individual project would be able to fully mitigate the potential impacts. While MM-TRA-1 would minimize VMT impacts associated with future development, impacts would not be fully mitigated. Therefore, impacts associated with VMT would remain significant and unavoidable." Future development projects should be required to fully mitigate VMT impacts. A potential option would be to have a fee system for situations that cannot be fully mitigated by VMT reduction measures, similar to the City of San Diego.
- Potential measures to reduce VMT may include the following:
- Improve or increase access to transit.
  - Increase access to common goods and services, such as grocery stores, schools, and daycare.
  - Incorporate affordable housing into the project.
  - Incorporate neighborhood electric vehicle network.
  - Orient the project toward transit, bicycle, and pedestrian facilities.
  - Improve pedestrian or bicycle networks, or transit service.
  - Provide traffic calming measures and strategies.
  - Provide bicycle parking.
  - Limit or eliminate parking supply.
  - Implement or provide access to a commute reduction program.
  - Provide car-sharing, bike sharing, and ride-sharing programs.
  - Provide transit passes.
  - Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.
  - Providing telework options.
  - Providing incentives or subsidies that increase the use of modes other than single-occupancy vehicle.
  - Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
  - Providing employee transportation coordinators at employment sites.
  - Providing a guaranteed ride home service to users of non-auto modes.

"Provide a safe and reliable transportation network that serves all people and respects the environment!"

A-6. This comment references the significant and unavoidable VMT impacts in the Draft EIR and states that future development projects should be required to fully mitigate VMT impacts. Commenter suggests a fee system similar to the City of San Diego and a bullet list of 18 potential VMT reduction measures. A fee program is implemented at the citywide level and would not be proposed or implemented as part of the proposed TCSP. The City does not currently have a Developer Impact Fee program in place for the project to participate in, so including mitigation related to payment of a fee would be infeasible.

The project includes program level TDM measures and project level TDM measures to help promote multimodal travel and reduce vehicular travel within the study area. It should be noted that the significant and unavoidable impacts only apply to Housing Element sites 20A and 20B, so some measures referenced in the comment that pertain to employment uses are not applicable.

These TDM measures referenced in the comment are included in the TCSP at a program level:

- Improve or increase access to transit.
- Increase access to common goods and services, such as grocery stores, schools, and daycare.
- Incorporate affordable housing into the project.
- Incorporate neighborhood electric vehicle network.
- Orient the project toward transit, bicycle, and pedestrian facilities.
- Improve pedestrian or bicycle networks, or transit service.
- Provide traffic calming measures and strategies.
- Provide bicycle parking.
- Limit or eliminate parking supply.

These TDM measures referenced in the comment are implemented at the project level by the future residential project's Homeowners Association (HOA):

- Implement or provide access to a commute reduction program.
- Provide car-sharing, bike sharing, and ride-sharing programs.
- Provide transit passes.
- Shifting single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services.

Lastly, these TDM measures referenced in the comment pertain to employee trip reductions, and therefore, are not applicable to the TCSP Update DEIR:

Mr. Michael Coyne, Principal Planner  
October 9, 2024  
Page 4

### System Planning

#### *Santee Town Center Specific Plan Update DEIR and Town Center Specific Plan Draft*

- A-7
- Caltrans System Planning recommends that language within the Santee TCSP Update DEIR and the TCSP Draft be updated from "Green Line Trolley" to "Copper Line Trolley". The Copper Line Trolley replaces the Green Line Trolley past the El Cajon Transit Center, which serves the Santee community. The Copper Line commenced on September 29, 2024 ([MTS Copper Line](#)).
- A-8
- In the TCSP Draft, there is no discussion of electric vehicles or charging facilities. The Santee TCSP Update DEIR includes information under several Housing Element Sites sections on the increased use of electric vehicles and strategies related to electric vehicle charging. This information also appears in Appendix E of the Santee TCSP Update DEIR.
- A-9
- Please consider including the emerging technology for autonomous vehicles and how this will be implemented in the transportation element of the community.

#### [SANDAG Draft Proposed 2025 Regional Plan](#)

- A-10
- A conceptual draft version of the SANDAG 2025 Regional Plan is available for review; please see the following proposed projects and feedback:
    - Rapid 880: El Cajon to UC San Diego.
    - SR-52 Managed Lanes includes the addition of a truck climbing lane.
    - On-Street and Off-Street Bikeway Central and East County Recurring Feedback and Impact.

### Complete Streets and Mobility Network

- A-11
- 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 network. 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 network. Early coordination with Caltrans, in locations that may affect both Caltrans and the City of Santee, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change targets, Caltrans is implementing Complete Streets and Climate Change policies into rations and Protection Program (SHOPP) projects to meet multi-

"Provide a safe and reliable transportation network that serves all people and respects the environment"

### A-6 (cont.)

- Providing telework options.
- Providing on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms.
- Providing employee transportation coordinators at employment sites.
- Providing a guaranteed ride home service to users of non-auto modes.

No changes to the mitigation measures in the Draft EIR are necessary.

A-7. This comment requests that the "Green Line Trolley" reference be updated to "Copper Line Trolley" which commenced during public review (September 29, 2024). This global update has been made throughout the Final EIR. No further response is required

A-8. This comment states there is no discussion of electric vehicles or charging facilities in the Specific Plan but that the Draft EIR and Appendix E includes reference to housing element sites increasing the use of electric vehicles and vehicle charging. Future development under the TCSP will be required to abide to Section 4.106.4.1 of the California Electrical Code (5% of parking spaces have charging facilities and 20% must have the infrastructure to be charger ready), which requires electric vehicle charging facilities to be implemented for all future housing developments. This policy will be enforced at the project level. No changes to the Draft EIR are necessary.

A-9. This comment requests that implementation of autonomous vehicle technology be considered. There is currently insufficient evidence on the effects of emerging technology for autonomous vehicles; therefore, the DEIR cannot include a reasonable and foreseeable analysis without substantial evidence. No changes to the Draft EIR are necessary.

A-10. This comment asks that the following be reviewed: SANDAG's Draft Proposed 2025 Regional Plan projects and feedback including the Rapid 880 from El Cajon to UC San Diego; the SR-52 Managed Lanes addition of a truck climbing lane; and the On-Street and Off-Street Bikeway Central and East County Recurring Feedback and Impact. Comment noted. It is understood that the Plan is in draft form only and will not be adopted prior to the anticipated certification of the EIR. These plans would also not affect the VMT analysis or conclusions. No changes to the Draft EIR are necessary.

A-11. Caltrans states they are looking forward to working with the City to evaluate potential Complete Streets projects. No further response is required.

Mr. Michael Coyne, Principal Planner  
 October 9, 2024  
 Page 5

- A-11 (cont.) modal mobility needs. Caltrans looks forward to working with the City to evaluate potential Complete Streets projects.
  - A-12 Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.
- Land Use and Smart Growth**
- A-13 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 network integrated through applicable "smart growth" type land use planning and policies.  
  
The City of Santee should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.
- Environmental**
- A-14 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. We look forward to the coordination of our efforts to ensure that Caltrans can adopt the alternative and/or mitigation measure for our R/W. We would appreciate meeting with you to discuss the elements of the Environmental Document that Caltrans will use for our subsequent environmental compliance.
  - A-15 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 approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits. Specifically, CEQA determination or exemption. The supporting documents must address all environmental impacts within the Caltrans' R/W and address any impacts from avoidance and/or mitigation measures.
  - A-17 We recommend that this project specifically identifies and assesses potential impacts caused by the project or impacts from mitigation efforts that occur within Caltrans'
 

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A-12. Caltrans states that bicycle, pedestrian, and public transit access during construction is important and should be maintained in accordance with their goals and policies. Bicycle, pedestrian, and public transit access would be maintained during construction in accordance with Caltrans and City policies and no changes to the Draft EIR are necessary.

A-13. This comment requests that the City continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction. The City acknowledges there will be coordination for intersection and interchange improvements with Caltrans where there is joint jurisdiction.

A-14. Caltrans states they will need to issue an encroachment permit for part of the project and offers to be a Responsible Agency under CEQA. Future environmental review opportunities by Caltrans for work in their right-of-way will be made available and coordinated by the City or by future private development entities.

A-15. This comment requests coordination regarding actions in Caltrans right-of-way and a meeting to discuss future environmental compliance. It is noted that actions in Caltrans right-of-way will require coordination and can include meetings to discuss future environmental compliance.

A-16. This comment states that in order to obtain an encroachment permit from Caltrans, a CEQA determination or exemption along with supporting environmental documentation that addresses impacts in Caltrans right-of-way must be provided. It is noted that Caltrans will require environmental documentation, including a CEQA determination or exemption, to issue an encroachment permit.

A-17. This comment recommends that impacts in Caltrans right-of-way consider all aspects of the project, and that Caltrans is interested in additional mitigation measures for the project. It is noted that Caltrans is interested in environmental review and mitigation measures for impacts in Caltrans right-of-way related to the project. As stated in the response to comments A-15 and A-16, coordination for environmental compliance is understood and would occur.

Mr. Michael Coyne, Principal Planner  
 October 9, 2024  
 Page 6

A-17 (cont.) R/W that includes impacts to the natural environment, infrastructure including but not limited to highways, roadways, structures, intelligent transportation systems elements, on-ramps and off-ramps, and appurtenant features including but not limited to fencing, lighting, signage, drainage, guardrail, slopes and landscaping. Caltrans is interested in any additional mitigation measures identified for the project's draft Environmental Document.

A-18 Should future projects based upon the changes enacted from the General Plan have elements and/or mitigation measures that affect Caltrans' R/W, Caltrans would welcome the opportunity to be a Responsible Agency under CEQA.

**Broadband**

A-19 Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

**Right-of-Way**

- A-20 • Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- A-21 • 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.

A-22 Additional information regarding encroachment permits may be obtained by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Projects with the following:

- require a Caltrans Encroachment Permit.
- have completed the Caltrans Local Development Review (LDR) process.
- have an approved environmental document.

are to submit documents for Quality Management Assessment Process (QMAP) process via email to [D11.QMAP.Permits@dot.ca.gov](mailto:D11.QMAP.Permits@dot.ca.gov). Early coordination with Caltrans is strongly advised for all encroachment permits.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

A-18. This comment states that Caltrans welcomes the opportunity to be a CEQA Responsible Agency if future projects or related mitigation measures would affect Caltrans right-of-way. Future environmental review opportunities by Caltrans for work in their right-of-way will be made available and coordinated by the City or by future private development entities.

A-19. Caltrans recognizes teleworking and remote learning reduce traffic impacts and VMT/GHGs due to the reliability of high-speed internet. No further response is required.

A-20. Caltrans refers to Business and Professional Code 8771 regarding perpetuation of survey monuments. No further response is required.

A-21. Caltrans states that work in their right-of-way will require discretionary review and approval by Caltrans. Future environmental review opportunities by Caltrans for work in their right-of-way will be made available and coordinated by the City or by future private development entities as described in response to comments A-15 through A-17 above.

A-22. This comment provides a link to the encroachment permit process and recommends early coordination. It is noted that Caltrans recommends early coordination for the encroachment permit process.

Mr. Michael Coyne, Principal Planner  
October 9, 2024  
Page 7

A-23 [ If you have any questions or concerns, please contact Mark McCumsey, LDR  
Coordinator, at (619) 985-4957 or by e-mail sent to [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov) .

Sincerely,

*Kimberly D. Dodson*

KIMBERLY D. DODSON, GISP  
Branch Chief  
Local Development Review

Attachments: Local Development Review (LDR) Safety Review Practitioner's Guidance

A-23. This comment provides contact info for Caltrans LDR Coordinator, Mark McCumsey. No further response is required.

"Provide a safe and reliable transportation network that serves all people and respects the environment!"



LETTER B

October 10, 2024

Mr Michael Coyne  
 City of Santee  
 10601 Magnolia Avenue  
 Santee, California 92071

RE: Draft Program EIR for City of Santee Town Center Specific Plan Amendment

Dear Mr Coyne:

As the Airport Land Use Commission (ALUC) for San Diego County, the San Diego County Regional Airport Authority (SDCRAA) offers our agency comments for the project referenced above.

- B-1 The document incorrectly references the project site's northern portion being located within Review Area (RA) 1 of the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) and its southern portion within RA 2. These should be reversed: the northern portion lies within RA 2, and the southern portion nearest Gillespie Field lies within RA 1. Any portion of a safety zone or noise contour of an ALUCP automatically constitutes RA 1, and all other portions of an Airport Influence Area (AIA) outside of RA 1 constitute RA 2.
- B-2 The document misstates the ALUC review responsibilities within RA 1 (p. 4.9-6). Until such time as the City of Santee chooses to implement the Gillespie Field ALUCP by integrating the policies and standards of the ALUCP into its zoning code and receives a consistency determination from the ALUC that Santee's implementation is consistent with the ALUCP—or, alternatively, if Santee overrules the ALUCP—all land use actions within RA 1 require individual project referral to the ALUC for a consistency determination.
- B-3 The document incorrectly states that ALUC review is not required if a project is compatible with the noise and safety compatibility policies, has been determined not to be a hazard or obstruction by the Federal Aviation Administration (FAA), and has been conditioned to include overflight notification. Those standards originally supported a basis for ALUC staff review without full Commission consideration, but that no longer applies (due to a change in SDCRAA Policy 8.30)—and regardless of internal operating procedures of the ALUC, Santee has the statutory obligation to refer all projects within RA 1 to the ALUC, including

B-1. This comment identifies that the locations of Gillespie Field's Review Areas 1 and 2 relative to the project site be reversed to indicate the northern portion within Review Area 2 and southern portion in Review Area 1. This change has been made to the Draft EIR page 4.9-6. This revision does not change the analysis or conclusions within the Draft EIR.

B-2. This comment states that all land use actions within Review Area 1 require individual consistency determination review by the ALUC, contrary to Draft EIR page 4.9-6 which lists land use actions that are not subject to ALUC review. The Draft EIR language has been updated in this Final EIR to revise Draft EIR page 4.9-6 to state all land use actions in Review Area 1 are subject to ALUC review. This revision does not change the analysis or conclusions within the Draft EIR.

B-3. This comment summarizes the exceptions listed on DEIR page 4.9-6 and explains that those no longer apply due to a change in policy (SDCRAA Policy 8.30) and that the City has a statutory obligation to refer all projects in Review Area 1 to the ALUC, including the Specific Plan Amendment itself or take steps to overrule the ALUCP. As noted in response to comment B-2, all land use actions in Review Area 1 are acknowledged as subject to ALUC review and the text on EIR page 4.9-6 has been amended to reflect this change in policy. Text has also been revised on pages 4.9-22 and 4.9-23 to clarify that the proposed project was submitted for ALUC review and on January 9, 2025 ALUC found the TCSP project conditionally consistent with the ALUCP and imposed project conditions that future proposed development within the project area must comply with the residential dwelling units or people per acre as specified by the applicable safety zone. This revision does not change the analysis or conclusions within the Draft EIR.

PO Box 82776  
 San Diego, CA 92138-2776  
[www.san.org/aluc](http://www.san.org/aluc) AIRPORT LAND USE COMMISSION



SAN DIEGO  
COUNTY  
REGIONAL  
AIRPORT  
AUTHORITY

- B-3 (cont.) | the Town Center Specific Plan Amendment itself—or otherwise take the requisite steps to implement or overrule the ALUCP (Cal. Pub. Util. Code §21676.5).
- B-4 | The Airport Hazards Impact Analysis (beginning p. 4.9-20) incorrectly states that new residential development is conditionally compatible up to 16 dwelling units per acre; that figure should be 20 dwelling units per acre.
- B-5 | The subsequent discussion of ALUCP compatibility of land uses within Safety Zone 4 implies that only conditionally compatible and incompatible uses “would require consultation with the ALUC.” As noted, all land use actions within RA 1 (including compatible land uses) require referral to the ALUC for consistency determination with the ALUCP.
- B-6 | The discussion further implies that only development proposals within Safety Zone 4 “shall be routed to the Federal Aviation Administration for a determination of no hazard to air navigation”, but all development proposals from any sponsor within the entire AIA require notice to and review by the FAA (as is acknowledged on p. 4.11-10). That requirement is per federal law (14 CFR §77) and sits apart from the ALUCP; the ALUCP only reinforces that federal requirement to encourage compliance since ALUC consistency determinations rely upon FAA findings and determinations to assure airspace compatibility of proposed structures and objects.
- B-7 | SDCRAA agrees with the conclusions of the Airport Hazards Impact Analysis for the project area, its Arts and Entertainment Neighborhood, and those portions of the Housing Element Sites within Safety Zones 3 and 4 (all summarized in the Executive Summary tables) that “the development densities allowed by the TCSP in Gillespie Field ALUCP Safety Zones 3 and 4 could be considered ‘incompatible’ by the ALUC and a safety hazard associated with these densities would occur. Therefore, impacts associated with development in Gillespie Field ALUCP Safety Zones 3 and 4 would result in significant and unavoidable impacts associated with the TCSP.”
- B-8 | The only comment otherwise in this conclusion would be the reference to Santee having the potential to “override” the ALUCP density limitations (in that section as well as on p. 4.11-10); the operative word in the statute is “overrule”, and SDCRAA notes that even if Santee does overrule the ALUCP density limitations, this would not change the presence and significant impact of the safety hazard for people residing and working in the project area—and hence

AIRPORT  
LAND USE  
COMMISSION

B-4. This comment states that new residential development is conditionally compatible up to 20 dwelling units per acre, not 16 as stated in Draft EIR analysis for airport hazards (beginning on page 4.9-20). The Draft EIR has been revised to fix this discrepancy. This discrepancy would not result in new or increased environmental impacts or change the conclusions of the Draft EIR.

B-5. This comment states that all actions within Review Area 1 require referral to the ALUC for consistency determination with the ALUCP. Draft EIR text page 4.9-21 has been updated to reflect that all land use actions within Review Area 1 would be referred to the ALUC. This revision does not change the analysis or conclusions within the Draft EIR.

B-6. This comment clarifies that all development proposals within the entire AIA require notice to and review by the FAA, and not just in Safety Zone 4. A change has been made to the Draft EIR page 4.9-21 in response to this comment. This change would not result in new or increased environmental impacts or change the conclusions of the Draft EIR.

B-7. The SDCRAA agrees with the significant and unavoidable impact conclusions in the Draft EIR related to future development in Gillespie Field Safety Zones 3 and 4. No further response is required.

B-8. This comment clarifies that the term “overrule” be used instead of “override” when referring to the City of Santee overruling the ALUCP density limitations and that impacts would remain significant and unavoidable regardless if the ALUCP is overruled by the City. The term “override” has been replaced with “overrule” and the City agrees that significant and unavoidable impacts will remain. This revision does not change the analysis or conclusions within the Draft EIR.

SAN DIEGO  
COUNTY  
REGIONAL  
AIRPORT  
AUTHORITY

B-8 (cont.) | the necessity of the EIR and a Statement of Overriding Considerations to legally justify project approval.

B-9 | Thank you for the opportunity to provide comments on the project, and the ALUC looks forward to submittal of an application for a consistency determination prior to decision-making consideration of the project by Santee. Please contact me at (619) 400-2464 or [rredman@san.org](mailto:rredman@san.org) if you have any questions.

Sincerely,



Ralph Redman  
Manager, Airport Planning

cc: Sjohnna Knack, Director, Planning, Noise, & Environment  
Amy Gonzalez, General Counsel  
Jamie Abbott, County of San Diego Airports

B-9. This comment provides contact information for Ralph Redman at the SDCRAA. No further response is required.

AIRPORT  
LAND USE  
COMMISSION



DocuSign Envelope ID: 867CC514-1ECC-4C37-A651-E40470EC3598

LETTER C



U.S. FISH AND WILDLIFE SERVICE  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



CALIFORNIA DEPARTMENT OF  
FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, California 92123

In Reply Refer to:  
FWS/CDFW-24-0132119\_CEQA\_SD

October 11, 2024  
*Sent Electronically*

Michael Coyne  
Principal Planner  
City of Santee  
10601 Magnolia Avenue  
Santee, California 92071  
[mcoyne@cityofsanteeca.gov](mailto:mcoyne@cityofsanteeca.gov)

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE SANTEE TOWN CENTER SPECIFIC PLAN UPDATE (SCH  
#2023090032)**

Dear Michael Coyne:

C-1

The U.S. Fish and Wildlife Service (Service) and California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the draft Environmental Impact Report (DEIR) and associated documents for the proposed Santee Town Center Specific Plan Update (Project) received on September 6, 2024. The project details referenced here are based on information provided in those documents and our knowledge of the draft Santee Multiple Species Conservation Program (MSCP) Subarea Plan. The Wildlife Agencies previously commented on the Notice of Preparation of the EIR for the Project in October 2023.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The Department is a Trustee Agency with jurisdiction over natural resources affected by the project [California Environmental Quality Act (CEQA) Guidelines §15386] and is a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code §2050 *et seq.*) and Fish and Game Code Section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) Program, a California regional habitat conservation planning program. The City of Santee (City) participates in the NCCP program through their enrollment in the County of San Diego Subregional MSCP and the development of their draft MSCP Subarea Plan (subarea plan).

C-1. This comment is introductory in nature and describes the project and the USFWS and CDFW role. No environmental issues are raised by this comment, and no further response is required.

Michael Coyne (FWS/CDFW FWS/CDFW-24-0132119\_CEQA\_SD)

2

The Project area is located in the City of Santee, within San Diego County. The proposed Project includes an update to the 1986 Santee Town Center Specific Plan (TCSP), which was last amended in 2019. The TCSP area includes five neighborhoods in the central part of the city, bounded by Mast Boulevard to the north, Magnolia Avenue to the east, Mission Gorge Road to the south, and Mast Park to the west. The San Diego River traverses through the center of the TCSP area, from east to the west. The Project area spans multiple neighborhoods, including the Arts and Entertainment Neighborhood (AEN), and is intended to encompass mixed-used development, open space, and other community-focused infrastructure. The Project will modify land use designations, establish new development standards, and introduce conceptual guidelines to guide future growth within the plan area. The update also includes adjustments to the boundaries of the TCSP to incorporate additional sites and improve connectivity within the city.

The Wildlife Agencies offer the following comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources and to ensure the project is consistent with ongoing regional habitat conservation planning efforts.

C-2

1. Trails within the San Diego River corridor: We appreciate that the Project, through application of Mitigation Measure BIO-11 of the DEIR, will require specific biological surveys to identify the presence of sensitive biological resources (including wetlands) prior to issuance of any permits or earth-moving activities. BIO-11 also requires avoidance measures to minimize impacts to wetlands and waters, including in accordance with the Land Use Adjacency Guidelines, conservation measures, and wetland protection standards of the subarea plan. Portions of the San Diego River corridor within the Project area are identified in the subarea plan as either City-owned Preserve Lands or San Diego River Conservation Opportunities Areas and are anticipated to be preserved and managed for the conservation of covered species, with limited impacts. We recommend any recreational uses within the buffer of the San Diego River corridor be passive and located as closely to adjacent development as possible. Furthermore, in order to minimize impacts to the San Diego River corridor and its wetland habitats, we request that the proposed Class 1 Bike Paths that cross the San Diego River to the west and east of Cuyamaca Street be removed from the Project (Figure 3-6 of the DEIR).

C-3

2. Impacts to nesting birds from operational activities: The DEIR includes Mitigation Measure BIO-9 to address potential impacts to nesting birds (including **least Bell's vireo** [*Vireo bellii pusillus*; federally and state endangered species]) from elevated noise resulting from operation activities within the TCSP, AEN, and Housing Element sites. The measure requires construction of temporary noise barriers or berms to reduce noise levels in suitable special-status species habitat to below 60 dBA or measured existing ambient noise levels. However, as written, the measure also allows noise levels from operational activities to exceed 60 dBA with incorporation of certain noise reduction strategies. Due to the documented presence of **least Bell's vireo** in multiple locations along the San Diego River where it runs through the Project area, we recommend that BIO-9 be modified to require noise levels from operational activities be reduced below 60 dBA or ambient and/or demonstrate that elevated noise levels from proposed projects

C-2. This comment recommends that any recreational uses within the buffer of the San Diego River corridor be passive and located as closely to adjacent development as possible and that the proposed Class 1 Bike paths that cross the San Diego River to the west and east of Cuyamaca Street be removed from the project as shown on Figure 3-6 of the Draft EIR. To the extent possible and in alignment with the City's Mobility Element and Active Transportation Plan, recreational uses would be passive and located closely to development. Both trails shown on Figure 3-6 are included in the City's Active Transportation Plan. The trail to the west is already existing. The trail to the east would be reconfigured to match an existing pathway and would also avoid existing conserved lands. No changes to the Draft EIR are necessary.

C-3. This comment concerns potential impacts to least Bell's vireo due to operational noises exceeding 60 dBA with incorporation of noise reduction strategies. The comment recommends modifying MM BIO-9 to require noise levels from operational activities be reduced below 60 dBA or ambient and/or demonstrate that elevated noise levels from proposed projects within the project area do not adversely impact occupation and breeding for special-status species (such as least Bell's vireo). The proposed project has been designed to avoid and/or reduce potential indirect impacts to sensitive biological resources from operational activities, in particular properties adjacent to the San Diego River floodway. Objective Design Standard K, Noise of the TCSP has been updated to require a minimum 45-foot buffer between the River floodway and delineated outdoor spaces/areas for entertainment and active recreational uses. This buffer would also serve to minimize the indirect effects of lighting, noise, and disturbance from pet and human activities on the biological resources, including occupation and breeding for special-status species like least Bell's vireo. MM BIO-8 and BIO-9 on pages 4.4-30 and 4.4-31 of the Revised Draft EIR have also been revised to clarify that noise levels may be reduced to 60 dBA or ambient as suggested by the commenter. These revisions do not change the analysis or conclusions within the Draft EIR.

DocuSign Envelope ID: 867CC514-1ECC-4C37-A651-E40470EC3598

Michael Coyne (FWS/CDFW FWS/CDFW-24-0132119\_CEQA\_SD)

3

- C-3 (cont.) within the Project area do not adversely impact the occupation and breeding success levels for special-status species (such as **least Bell’s vireo**) within the adjacent San Diego River corridor.
- C-4 3. **Habitat mitigation requirements:** To address impacts to habitat from the proposed project and maintain consistency with the subarea plan, Mitigation Measure BIO-6 commits the City to mitigating impacts to specific vegetation communities at pre-determined ratios. To build the Preserve for the subarea plan, offsite mitigation should be established only within the Plan Area for the subarea plan. We recommend that BIO-6 be revised to require that habitat-based mitigation occur within the Plan Area of the subarea plan and that mitigation lands be protected with conservation easement(s) or similar instruments and have in-perpetuity management fully described and financed.
- C-5 4. **Cumulative impacts to San Diego River wildlife corridor function:** The Project area is traversed from east to west by the San Diego River with development anticipated both north and south of the river up to the 100-year floodway boundary in many cases. As stated in the DEIR, the San Diego River through the City is a key component for wildlife movement between conserved areas to the east and west, particularly for birds and mammals. This corridor provides important habitat functions for local wildlife such as breeding, sheltering, foraging and dispersal. The Wildlife Agencies are aware of another proposed project, the Carlton Oaks Country Club and Resort, located downstream of the Project within the flood plain of the San Diego River. We are concerned that, cumulatively, these projects have the potential to negatively impact the wildlife corridor function of the San Diego River. As such, we recommend the final EIR include an analysis of cumulative impacts to wildlife corridor function along the San Diego River as well as measures to reduce potential impacts (e.g., requirement that future projects be designed so that any associated fuel modification zones are located outside of the adjacent riparian area and land use adjacency measures to minimize impacts from noise and lighting).
- C-6 We appreciate the opportunity to comment on this DEIR **and the City’s efforts to ensure** the Project is consistent with the conservation goals and avoidance, minimization, and mitigation measures of the subarea plan. The comments and recommendations provided are based on our knowledge of listed, sensitive, and declining vegetation communities in the City. If you have questions or comments regarding this letter, please contact [Eric Porter](mailto:Eric_Porter@fws.gov)<sup>1</sup> of the Service at 760-431-9440, or [Heather Schmalbach](mailto:Heather.Schmalbach@wildlife.ca.gov)<sup>2</sup> of the Department.

<sup>1</sup> Eric\_Porter@fws.gov  
<sup>2</sup> Heather.Schmalbach@wildlife.ca.gov

C-4. This comment recommends modifying MM BIO-6 to require that habitat-based mitigation occur within the Plan Area of the subarea plan and that mitigation lands be protected with conservation easement(s) or similar instruments and have in-perpetuity management fully described and financed. The current working draft Subarea Plan prioritizes habitat-based mitigation to be within the Subarea Plan Area; however, mitigation is allowed outside of the Subarea Plan Area. Conservation easements are required to be recorded on privately owned lands where mitigation takes place. For mitigation on City owned land, a restrictive covenant is required. Whether privately or publicly owned, the Subarea Plan requires in-perpetuity management. No changes to the Draft EIR are necessary.

C-5. This comment concerns cumulative impacts to the San Diego River wildlife corridor. The comment requests that the Draft EIR consider cumulative impacts associated with another project, the Carlton Oaks Country Club and Resort. Cumulative mitigation measures are suggested, including requiring fuel modification zones outside of riparian areas and land use adjacent measures to minimize noise and lighting impacts. Chapter 7.0, Cumulative Impacts of the EIR analyzes cumulative impacts associated with the project and cumulative growth projections in the region. Chapter 7.0 acknowledges that cumulative impacts to sensitive biological resources could occur, particularly with resources associated with the San Diego River. The EIR found that with the implementation of the project’s mitigation measures as well as cumulative project compliance with regional resource planning documents such as the Multiple Species Conservation Plan, draft subarea plans, Resource Protection Ordinance, and Vernal Pool Habitat Conservation Plan and applicable federal and state regulatory standards and permit requirements, no cumulative biological resources impacts would occur. No changes to the Draft EIR are necessary.

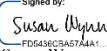
C-6. This comment thanks the City for the opportunity to comment and provides contact information for Eric Porter of the Service and Heather Schmalbach of the Department. No further response is necessary.

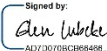
DocuSign Envelope ID: 867CC514-1ECC-4C37-A651-E40470EC3598

Michael Coyne (FWS/CDFW FWS/CDFW-24-0132119\_CEQ\_A\_SD)

4

Sincerely,

Signed by:  
  
FD6436C9A57AA1...  
Susan Wynn  
For Jonathan D. Snyder  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service

Signed by:  
  
AD7D079BCB9845E...  
Glen Lubeke  
Environmental Program Manager  
California Department of Fish and Wildlife

cc:

[Melanie Burlaza](#), California Department of Fish and Wildlife  
[Jonathan D. Snyder](#), U.S Fish and Wildlife Service  
[Susan Wynn](#), U.S. Fish and Wildlife Service

LETTER D



**PUBLIC WORKS**  
COUNTY AIRPORTS  
1960 JOE CROSSON DRIVE, EL CAJON, CA 92020  
(619) 956-4800 FAX: (619) 956-4801  
www.sdcountryairports.com

**WILLIAM P. MORGAN, P.E.**  
INTERIM DIRECTOR

October 11, 2024

Attn: Michael Coyne, Principal Planner  
City of Santee  
Planning & Building Department, City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071

**COMMENTS TO THE DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR  
THE CITY OF SANTEE TOWN CENTER SPECIFIC PLAN AMENDMENT**

Dear Michael Coyne,

D-1

The County of San Diego (County), Department of Public Works, Airports Division, as owner and operator of Gillespie Field (Airport), is responding to the Draft Program Environmental Impact Report (PEIR) for the City of Santee Town Center Specific Plan (TCSP) Amendment. The proposed amendment raises considerable concerns related to safety, operational impacts, and compliance with State law, including the Gillespie Field Airport Land Use Compatibility Plan (ALUCP).

Gillespie Field, located approximately 0.5 miles south of the TCSP proposed project site, serves a critical role in general aviation, handling approximately 174,000 annual operations over the past five years. In consideration of the Federal Aviation Administration's (FAA) authority over aircraft in flight, it is important to note that the County's purview reflects the limits of our authority as ground-facility managers. As a long-standing transportation asset and economic driver within the community, we want to ensure that proposed new developments or new occupants of existing structures that are subject to noise-sensitive and safety-related land uses located in proximity to aviation activities and within the Airport Influence Area (AIA), are compatible and well-informed neighbors. The proposed residential densities and construction activities could adversely impact both airport safety and operations. Specifically, the proximity of the proposed development to Runway 17/35, the second-longest runway with a GPS approach, raises multiple safety and operational concerns.

SANDIEGOCOUNTY.GOV

D-1. This comment is introductory in nature providing background on Gillespie Field and states that Gillespie Field Runway 17/35 raises multiple safety and operational concerns for the project, which is subject to review by the San Diego County Regional Airport Authority. No specific environmental comments are included in comment D-1 and no further response is necessary.

City of Santee's Planning Department  
 October 11, 2024  
 Page 2

- D-1 (cont.) Public Utilities Code (PUC) section 21675(a) mandates that each ALUCP provide for the orderly growth of airports and surrounding land uses while safeguarding public welfare. The adopted ALUCP includes height restrictions on buildings, specified land uses, and determined building standards, including soundproofing for properties adjacent to airports, within the airport influence area. Additionally, PUC section 21676(a) requires local agencies to submit General Plan and Specific Plan Amendments to the Airport Land Use Commission, in this case the San Diego Regional Airport Authority, to notify them if the plans are inconsistent with the ALUCP. This underlines the critical need for consistency between regulatory documents to protect the safety and welfare around airports.
- D-2 The ALUCP, as required by State law, is designed to ensure that land use surrounding Gillespie Field does not compromise safety or operations. However, the TCSP Amendment proposes residential densities that exceed ALUCP limits. Specifically, for Housing Sites 16A and 16B, located within Safety Zone 4, are capped at a density of 20 dwelling units per acre (du/ac). The TCSP proposes densities of 30 to 36 du/ac for 16A and 14 to 22 du/ac for 16B. Similarly, Housing Sites 20A and 20B, split-zoned by Safety Zones 4 and 6, are restricted to 20 du/ac in Safety Zone 4, but the TCSP allows for densities of 22 and 30 du/ac for 20A and 30 to 36 du/ac for 20B. This inconsistency creates conflicts with established ALUCP policies.
- D-3 County Airports wants to ensure that future occupants of proposed residential development are aware they would be moving into buildings located under the air traffic pattern of Gillespie Field. The project's administrative record and project proponents should discuss the proximity of the project to the airport and associated effects with future occupants. The ALUCP requires that all new residential projects and existing structures proposed for new use located within the Overflight Notification Area be required to record a notice informing residents/occupants of the potential environmental impacts related to aircraft, and that the property is subject to overflight, sight, and sound of aircraft operating from the Gillespie Field. Increased densities in these areas could lead to heightened noise complaints from overflight and increased safety hazards, particularly during peak operational periods, varying weather conditions, or aircraft malfunctions. Additionally, construction equipment, such as the use of cranes, can obstruct or impede runway operations, potentially leading to temporary runway closures. These closures can limit the airport's capacity and alter flight paths. Protecting the integrity of the runway during construction is also vital to ensure continued safe operations at Gillespie Field for the travelling public.
- D-4
- D-5

SANDIEGOCOUNTY.GOV

D-2. This comment states that the proposed residential densities for Housing Element sites 16A (30-36 du/ac) and 16 B (14 -22 du/ac) and Housing Element sites 20A (22-30 du/ac) and 20B (30-36 du/ac) exceed the ALUCP limits of 20 du/ac within Safety Zone 4 and this inconsistency creates a conflict. This inconsistency and conflict is identified in the Draft EIR as a significant and unavoidable impact in Draft EIR Section 4.9, Hazards and Hazardous Materials, and Section 4.11, Land Use and Planning. See also Response B-3.

D-3. This comment requests that the administrative record for the project describe proximity to the airport and summarize the Overflight Notification Area requirements to inform residents of air traffic from Gillespie Field. Draft EIR pages 2-8 and 2-9 state that Gillespie Field is approximately 0.6 mile south of the AEN. Draft EIR Figure 4.9-2b identifies the overflight area surrounding Gillespie Field and the discussion on Draft EIR page 4.9-21 indicates that the Gillespie Field ALUCP Review Area 2 requires the recordation of overflight notification documents. No changes to the Draft EIR are necessary.

D-4. This comment states that increased densities noted in Comment D-2 could lead to heightened noise complaints. Airport noise conflicts with future residents would be addressed by the overflight notification requirements. No changes to the Draft EIR are necessary.

D-5. This comment states that project-related construction equipment, such as cranes, may limit airport operations. If construction equipment that would exceed a 100:1 sloped surface from the nearest point of the nearest runway out to 20,000 feet or 200 feet AGL (above ground level) beyond, a permit from the FAA would be required and information related to construction equipment would be included with the submittal of FAA Form 7460-1 required as part of the FAA review process described in the Specific Plan and Draft EIR. No changes to the Draft EIR are necessary.

City of Santee's Planning Department  
October 11, 2024  
Page 3

- D-6 To address these critical concerns, we strongly urge that the approval of the TCSP Amendment be contingent upon ensuring that all individual development projects within the TCSP strictly adhere to the ALUCP and meet FAA requirements. Compliance with these standards is essential to mitigate the risks associated with increased residential density, construction activities, and new land uses near the airport. We recommend that the City of Santee submit this project to the San Diego County Regional Airport Authority for consistency review with the airport's ALUCP.
- D-7 While we understand the importance of the proposed amendment in meeting housing needs, it is crucial to address the inconsistencies with State law and the safety and noise concerns for future residents. We appreciate your attention to these critical matters and look forward to collaborating to support the growth of the City of Santee while ensuring the continued safe and efficient operation of Gillespie Field.
- D-8 Pursuant to CEQA Guidelines Section 21092.2, we request to be informed of all future notices affiliated with the TCSP Amendment, and please continue to include County Airports on notifications regarding this project. For more information about these comments or Gillespie Field Airport, please contact me at (619) 956-4800 or by email at [Jamie.Abbott@sdcounty.ca.gov](mailto:Jamie.Abbott@sdcounty.ca.gov).

Sincerely,



Jamie Abbott, Director of Airports  
Department of Public Works

cc: Cathe Johnson – Gillespie Field Airport Manager, Department of Public Works  
Marc Baskel – Program Coordinator, Department of Public Works  
Jeff Kashak – Environmental Planning Manager, Department of Public Works

SANDIEGOCOUNTY.GOV

D-6. This comment asks that the City submit the project to the San Diego County Regional Airport Authority for consistency review with the airport's ALUCP. Future development proposals will be submitted to the SDCRAA for consistency review with the Gillespie Field ALUCP. See also Response B-3.

D-7. This comment states the importance of meeting housing needs while ensuring safe airport operations. No further response is required.

D-8. This comment requests all future notices affiliated with the project be sent to County Airports to Jamie Abbott. The City will continue to include County Airports in future notices affiliated with the project.



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

Environmental Review Committee

October 8, 2024

LETTER E

**RECEIVED**

OCT 11 2024

Dept. of Development Services  
City of Santee

To: Mr. Michael Coyne, Principal Planner  
Planning and Building Department  
City of Santee  
10601 Magnolia Avenue, Building 4  
Santee, California 92071

Subject: Draft Program Environmental Impact Report  
City of Santee Town Center Specific Plan Amendment  
GPA2023-1, TCSPA2023-1, R2023-1, ZA2023-2, AEIS2023-2

Dear Mr. Coyne:

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

Based on the information contained in the DPEIR and its Appendix D, we have the following comments:

- E-1 1. Section 3.3 of Appendix D mentions aerial photos which were consulted as part of Other Archival Research. That list omits mention of the 1928-29 "Tax Factor" aerial photo series flown for the County Assessor and available at the Department of Public Works' Cartographic Services desk in Kearny Mesa. It is also available at several additional locations. Given the 25-year gap between the earliest photos accessed for Appendix D and the Tax Factor photos, the City of Santee should require a review of those photos and incorporate into Appendix D any insights they provide.
- E-2 2. Mitigation Measure CUL-2, repeated for each of the elements of the DPEIR, is written as though all cultural resources that will be encountered through the monitoring programs will be Tribal cultural resources. For such resources, the mitigation program is comprehensive and appropriate. However, it omits consideration of the treatment of non-Tribal historic period material. A review of the known sites in the TCSPA clearly shows that such resources will be encountered. The mitigation measures need to be expanded to address them, including requiring curation per the cited City of Santee Policy 8.2.
- E-3 3. In mitigation measures CUL-2, under Artifact Disposition, it requires that "The landowner(s) shall relinquish ownership of all cultural resources..." Relinquish to whom?

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

E-1. This comment requests that Section 3.3 of Appendix D include a review of the 1928-1929 Tax Factor aerial photo series. On October 30, 2024, HELIX requested copies of the 1928-1929 Tax Factor aerial photographs for this project location from the South Coastal Information Center (SCIC) where they are on file. This information has been reviewed and incorporated into page 4.5-17 of the Revised Draft EIR. These revisions do not change the analysis or conclusions within the Draft EIR.

E-2. This comment requests that MM CUL-2 be updated to consider the treatment of non-tribal historic period material. MM-CUL-2 on page 4.5-23 of the Revised Draft EIR has been updated to reflect both prehistoric and historic-period archaeological resources. This revision does not change the conclusions within the Draft EIR.

E-3. This comment requests that MM CUL-2 clarify who cultural resources would be "relinquished" to. MM CUL-2 on page 4.5-23 of the Revised Draft EIR has been updated to reflect that recovered artifacts shall be curated with the accompanying catalog to current professional repository standards or returned to the appropriate Native American Tribe(s), as agreed upon by the Principal Investigator, Native American representative(s), and City staff. This revision does not change the conclusions within the Draft EIR.



E-4 4. As this is a programmatic EIR, it is the environmental analyses for the individual DEIR or DMND which will provide project-specific information and mitigation measures. Please ensure that SDCAS is included in the appropriate public notices so that we can participate.

Thank you for the opportunity to participate in the public review of these environmental documents.

Sincerely,

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

cc: Helix Environmental  
SDCAS President  
File

E-4. This comment requests that the Archaeologic Society be included in future public notices. The City will include the San Diego County Archaeological Society in future public notices regarding the project.

LETTER F



GENERAL SERVICES

5580 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CALIFORNIA 92123  
(858) 694-2338

MARKO MEDVED, PE, CEM  
DIRECTOR

CARRIE HOFF  
ACTING ASSISTANT DIRECTOR

October 14, 2024

Michael Coyne, Principal Planner  
City of Santee, Planning and Building Department  
City Hall, Building 4  
10601 Magnolia Avenue  
Santee, CA 92071

Sent via email to: [mcoyne@cityofsanteeca.gov](mailto:mcoyne@cityofsanteeca.gov)

**REQUEST FOR COMMENTS ON THE CITY OF SANTEE'S DRAFT TOWN CENTER SPECIFIC PLAN UPDATE PROGRAM ENVIRONMENTAL IMPACT REPORT**

Dear Mr. Coyne,

F-1 The County of San Diego (County) staff reviewed the City of Santee's Notice of Availability of a Draft Program Environmental Impact Report (PEIR) for the City of Santee's Town Center Specific Pan Update (Project), received on September 4, 2024.

County staff appreciated the opportunity to review the Project and draft PEIR and offer the following comments for consideration. Please note that none of these comments should be construed as County support or opposition for this Project.

F-2 • The proposed rezoning for Housing Element Sites 20A, and 20B is consistent with County goals for providing higher-density affordable housing options for this parcel. However, the environmental mitigation measures, roadway infrastructure, streetscape, and objective design standards, including but not limited to street furniture, open space and recreation, and historic site adjacency, required by the Project and draft PEIR would not promote the development of affordable housing on Housing Element Sites 20A and 20B and may only be viable for upscale market-rate housing, which is contrary to the County and City's goals. The Project's requirements, particularly environmental mitigation measures, roadway infrastructure, streetscape, and objective design standards should be reconsidered or revised for to Sites 20A and 20B in the Project area to promote affordable housing on these sites.

F-3 • The County may identify the need to develop new or expand existing buildings or facilities on County-owned property within the Project area in the future, and the Project's draft PEIR goals, objectives and statements relating to limiting the introduction of new or

SANDIEGOCOUNTY.GOV

F-1. This comment is introductory in nature, describing General Services' review of the project. No further response is required.

F-2. This comment requests reconsidering or revising residential development standards on Housing Element sites 20A and 20B to promote affordable housing on these sites. This comment is not related to the adequacy of the environmental analysis within the Draft EIR. The residential development standards identified in the TCSP are included to ensure that development within the TCSP meets the vision and goals established for the TCSP area and be consistent with the City's adopted Housing Element. No revisions to the TCSP or the Draft EIR have been made as a result of this comment.

F-3. This comment requests that language be removed related to limiting the introduction of new or expanded institutional uses within the Facilities Based Neighborhood. This comment is not related to the adequacy of the environmental analysis and no changes to the Draft EIR are necessary.

- F-3 (cont.) expansion of existing institutional uses within the Facilities Based Neighborhood should be removed.
- F-4
- County-owned parcel Assessor's Parcel Number 381-050-69, site of the future County Animal Shelter, should be included in the Facilities Based Neighborhood to be consistent with the assigned Institutional Specific Plan Land Use Designation and other large County-owned facilities (such as Las Colinas Women's Detention and Reentry Facility and Edgemoor Skilled Nursing Facility) located in the Facilities Based Neighborhood Project area.
- F-5
- The Mixed-Use Overlay should be applied to both Sites 20A and 20B, which is consistent with the other Housing Element Sites 16A and 16B.
- F-6
- All public buildings and facilities be considered "Permitted Uses" for all the Project's Land Use Designations in the Use Regulations or require "Development Review Permit" at most.
- F-7
- The Project area overlaps with existing and planned County facilities, projects and properties owned and or managed by the County. Please clearly identify underlying County property ownership within the Project and PEIR.
- F-8
- The PEIR evaluates cumulative impacts in conjunction with related past, present, and reasonably foreseeable future projects. A list of projects on County land should be requested from Scott Christmas, Chief of Capital Projects, at [scott.christman@sdcounty.ca.gov](mailto:scott.christman@sdcounty.ca.gov) to ensure the Project is using the latest information available in the analysis.
- F-9
- The County appreciates the opportunity to comment on this Project and draft PEIR. 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 Marcus Lubich, Project Manager, at (858) 414-4593, or via e-mail at [marcus.lubich@sdcounty.ca.gov](mailto:marcus.lubich@sdcounty.ca.gov).

Sincerely,

*Marcus Lubich*

Project Manager, Asset Management Division  
General Services

SANDIEGOCOUNTY.GOV

F-4. This comment requests that Assessor's Parcel Number 381-050-69, the site of the future County Animal Shelter, be included in the Facilities Based Neighborhood. The Specific Plan has been revised to include the future County Animal Shelter within the Facilities Based Neighborhood. This change is reflected on Figure 3-3, page 3-5 the Revised Draft EIR.

F-5. This comment requests that the mixed use overlay apply to Housing Element sites 20A and 20B. This comment is not related to the adequacy of the environmental analysis. No change to the TCSP or draft EIR have been made as a result of this comment.

F-6. This comment requests that public building and facilities be deemed "permitted uses" or require a "development review permit" at most. This comment is not related to the adequacy of the environmental analysis. No change to the TCSP or draft EIR have been made as a result of this comment.

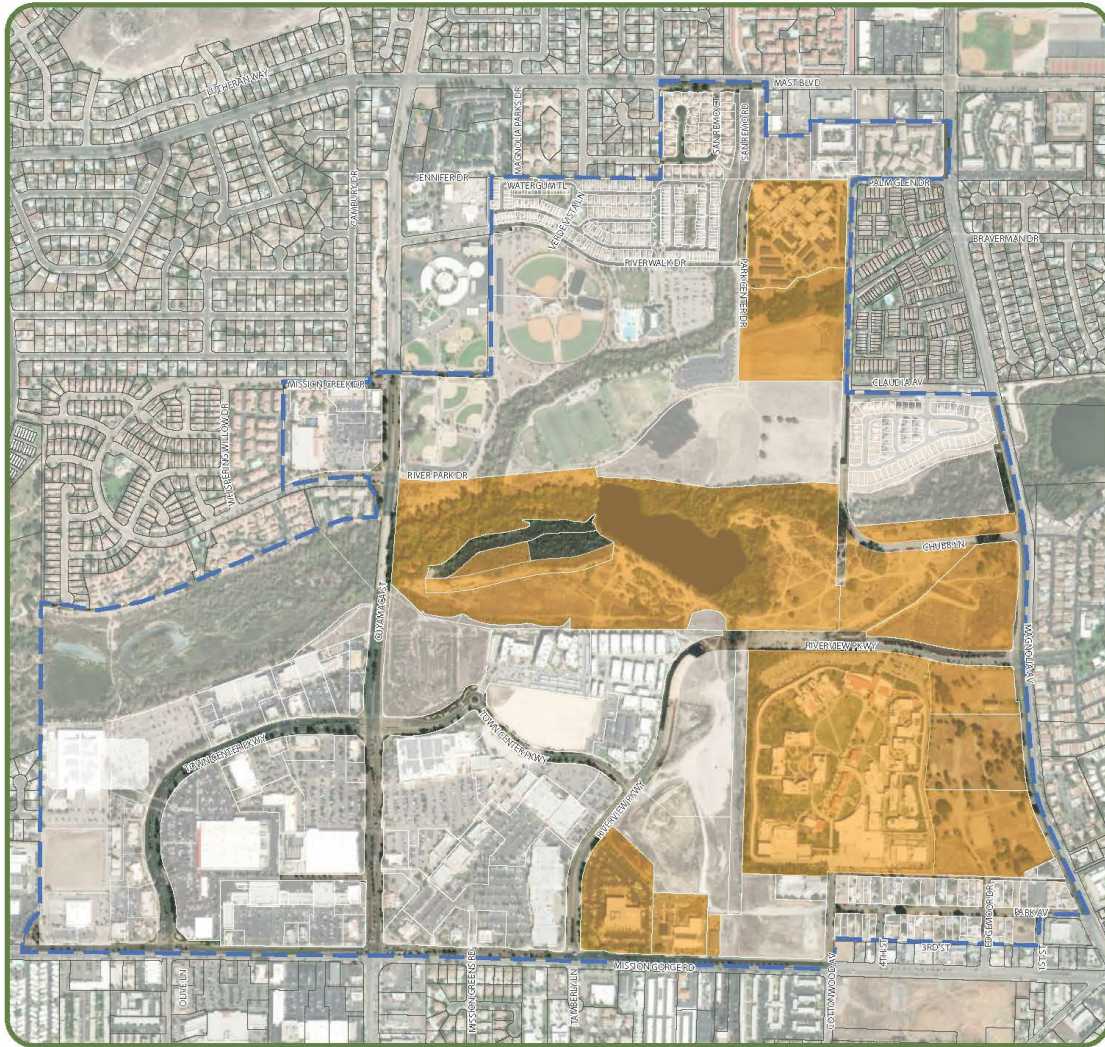
F-7. This comment requests that the EIR specifically identify property owned by the County that overlaps with the project area. A figure has been prepared to identify property owned by the County within the project area and is included below. No changes to the Draft EIR are necessary.


F-8. This comment asks that a cumulative list of projects be requested from Scott Christmas at the County. The project's cumulative analysis relies upon the growth projection method and not an individual list of projects. The plans and programs that were assumed in the growth projection method are included in Chapter 7, Cumulative Impacts. No list of cumulative projects will be requested for use in this EIR.

F-9. This comment requests that Marcus Lubich at General Services be included on correspondence regarding the project. The City will include General Services in future project notices.

City of Santee | Town Center Specific Plan

County-Owned Property Map



 Properties within the Town Center Specific Plan owned by the County of San Diego\*. Information obtained from SanGIS warehouse data as of August 2023.



LETTER G

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation



DIVISION OF AERONAUTICS - M.S. #40  
1120 N STREET  
P. O. BOX 942874  
SACRAMENTO, CA 94274-0001  
PHONE (916) 654-4959  
FAX (916) 653-9531  
TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)

October 14, 2024

Michael Coyne  
Principal Planner  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

Electronically Sent <[mcoyne@cityofsanteeca.gov](mailto:mcoyne@cityofsanteeca.gov)>

Re: SCH # 2023090032 - Santee Town Center Specific Plan Update

Dear Mr. Coyne:

G-1

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), has reviewed the Draft Environmental Impact Report (EIR) for the Santee Town Center Specific Plan Update (Project). The Division of Aeronautics collaborates with cities, counties, and Airport Land Use Commissions (ALUC) to ensure compliance with the State Aeronautics Act (California Public Utilities Code Section 21001 et seq.). We appreciate the opportunity to participate in the EIR review process.

The City of Santee (City) is proposing to update the Santee Town Center Specific Plan (TCSP) and proposes five neighborhoods and includes a comprehensive update with expanded boundaries and updated standards within the TCSP consistent with densities and intensities established by existing zoning and the adopted and certified 2021-2029 Housing Element.

Compliance with Airport Land Use Compatibility Plan (ALUCP)

G-2

Pursuant to the State Aeronautics Act, California Public Utilities Code Section 21676(b) mandates that local agencies refer proposed amendments to general or specific plans within airport land use commission boundaries to the commission for review. If the commission deems the proposed action inconsistent with its plan, the referring agency will be notified. Any development within safety zones or airport influence areas must comply with the safety criteria and restrictions outlined in the Airport Land Use Compatibility Plan(s).

Portions of the Project site lie within Review Area 1, Review Area 2, Safety Zone 3, Safety Zone 4, and Safety Zone 6 of Gillespie Field. Therefore, it must adhere to the safety criteria and

"Provide a safe and reliable transportation network that serves all people and respects the environment"

G-1. This comment is introductory in nature, describing the project and Caltrans' role. No specific response is required.

G-2. This comment states that amendments to specific plans within an airport land use commission boundary is subject to commission review and must adhere to the safety criteria and restrictions in the 2010 Gillespie Field ALUCP. The Draft EIR relies on the 2010 Gillespie Field ALUCP for land use and safety criteria and restrictions. No change to the Draft EIR is necessary in response to this comment.

Mr. Michael Coyne, Principal Planner  
 October 14, 2024  
 Page 2

G-2 (cont.) restrictions outlined in the 2010 Gillespie Field Airport Land Use Compatibility Plan (ALUCP), adopted by the ALUC pursuant to the PUC, Section 21674.

G-3 The Project stipulates that it contains increased density development and introduces new noise and safety concerns that are incompatible with the ALUCP and do not comply with the guidelines outlined in the California Airport Land Use Planning Handbook. This could lead to more people living or working in areas that are affected by airport noise or pose a risk in the event of an aircraft incident. To ensure compatibility between the Santee Town Center Specific Plan Update and the ALUCP, we recommend implementing several mitigation measures. These include requiring avigation easements from developers to grant the airport overflight rights, enhancing soundproofing for new buildings within high-noise areas, and adjusting residential densities to minimize noise exposure and airport safety hazards. Additionally, height restrictions should be enforced to maintain safe flight paths, while disclosure agreements would ensure that potential buyers or tenants are fully informed about airport proximity and associated noise and safety impacts. Ongoing coordination between the city, developers, and the ALUC is essential to align future projects with ALUCP guidelines and ensure a balanced approach to urban growth.

The ALUCP density and intensity limits were determined in accordance with PUC section 21001 relating to the State Aeronautics' Act and the mandated guidance provided by the Handbook. The ALUCP is a fundamental tool used by ALUCs in fulfilling their purpose of promoting airport land use compatibility, in order to provide for the orderly development of air transportation, while at the same time protecting the public health, safety, and welfare.

G-4 The Division recognizes that, like many other cities in California, the City is facing a shortage of affordable housing and is seeking new opportunities for residential development. In this context, it is crucial to review environmental justice and equity concerns for alignment with the goals outlined in the California Transportation Plan 2050 and the California Aviation System Plan 2020. It is also important to note that new housing laws do not override existing statutes, including PUC Section 21670, which mandates that counties establish ALUCs and compatibility plans to safeguard public health, safety, and welfare.

**Noise Compatibility**

G-5 A portion of the plan area falls within the 60-65 decibel (dB) Community Noise Equivalent Level (CNEL) contours for Gillespie Field as shown in the ALUCP. Development within this area must adhere to the noise criteria and use restrictions outlined in the ALUCP. Due to its proximity to the airport, the Project site may be subject to aircraft overflights and subsequent aircraft-related noise impacts.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

G-3. This comment recommends implementing mitigation measures to require avigation easements, enhancing soundproofing for new buildings within high-noise areas, and adjusting residential densities to minimize noise exposure and airport safety hazards. Avigation easements are more common in Safety Zones 1 and 2, which do not apply to the project, and were not recommended by the ALUC in their comments on the Draft EIR (see Comment Letter B). Overflight notification is discussed in the Draft EIR and would projects would be required to meet the noise compatibility standards in the ALUCP. See also Response B-3, which acknowledges all projects within Review Area 1 are subject to ALUC review and consistency determination. No change to the Draft EIR is necessary in response to this comment.

G-4. This comment recognizes the affordable housing shortage and states the importance of considering the goals in the California Transportation Plan 2050 and the California Aviation System Plan 2020 to address environmental justice and equity concerns. The comment also states that new housing law does not override ALUCP compatibility issues. This comment is noted and does not indicate that the Draft EIR needs to be revised. No change to the Draft EIR is necessary in response to this comment.

G-5. This comment states the project must adhere to noise criteria and use restrictions in the ALUCP, including subjectivity to aircraft overflight and aircraft-related noise as part of the project is within the 60-65 decibel noise contour. The Draft EIR acknowledges and repeats the noise criteria and use restrictions in the ALUCP, including aircraft overflight and noise. No change to the Draft EIR is necessary in response to this comment.

Mr. Michael Coyne, Principal Planner  
 October 14, 2024  
 Page 3

#### Other Airport Hazards

G-6

California Public Utilities Code Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces. In accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). For further information or a copy of Form 7460-1, please refer to the FAA website <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

We recommend further review of potential compatibility concerns related to airport obstructions and hazards to flight, such as:

- **Wildlife attractants:** Project elements (e.g., open waste disposal areas) that could attract wildlife, posing a hazard to aircraft.
- **Lighting:** Improper lighting design or excessive light intensity could interfere with night-time airport operations and can cause safety hazards to pilots.
- **Glare:** Reflective surfaces (e.g., extensive use of solar panels) could create glare that disrupts pilots' visibility.

#### Intent to Overrule

G-7

If the ALUC determines that the proposed action is inconsistent with the airport land use compatibility plan, the referring agency shall be notified. The local agency may, after a public hearing, propose to overrule the ALUC by a two-thirds vote of its governing body after it makes specific findings. At least 45 days prior to the decision to overrule the ALUC, the local agency's governing body shall provide to the ALUC and Caltrans a copy of the proposed decision and findings. Caltrans reviews and comments on the specific findings a local government intends to use when proposing to overrule an ALUC. Also, pursuant to the PUC 21670 et seq., findings should show evidence that the local agency is minimizing "...the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."

The intent to override an ALUC should not be taken lightly. PUC Section 21675.1(f) provides: "If a city or county overrules the commission pursuant to subdivision (d) with respect to a publicly owned airport that the city or county does not operate, the operator of the airport is not liable for damages to property or personal injury resulting from the City/County decision to proceed with the action, regulation, or permit."

The Division encourages collaboration among the Lead Agency, the Airport Land Use Commission, and Gillespie Field representatives to prioritize the safety and well-being of current and future residents in the Santee Town Center Specific Plan Update area.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

G-6. This comment requests that structure height should be considered near the airport and that Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" may require completion of FAA Form 7460-1. Further review of potential compatibility concerns related to wildlife attractants, lighting, and glare are also suggested. Federal Aviation Regulation Part 77 is noted in the Draft EIR on page 4.9-10. It is noted that future development may require completion of Form 7460-1 as part of the review process required for all projects located within Gillespie Field ALUCP Review Area 1. No open waste disposal areas are proposed that would be considered wildlife attractants. Lighting and glare impacts are addressed in Draft EIR Section 4.1, Aesthetics, and would be less than significant. No changes to the Draft EIR are necessary.

G-7. This comment reiterates that a local agency's overrule of an ALUC action is possible; however, it should not be taken lightly and in this event, the airport operator would not be liable for damages to property or personal injury. This comment is noted that in the event the City overrules an ALUC action, the airport operator would not be liable for damages. No changes to the Draft EIR are necessary in response to this comment.

Mr. Michael Coyne, Principal Planner  
October 14, 2024  
Page 4

G-8 Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at [tiffany.martinez@dot.ca.gov](mailto:tiffany.martinez@dot.ca.gov).

Sincerely,



Tiffany Martinez  
Associate Transportation Planner  
Division of Aeronautics

c: State Clearing House <[state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov)>,  
Matthew Friedman, Chief Office of Aviation Planning, <[matthew.friedman@dot.ca.gov](mailto:matthew.friedman@dot.ca.gov)>,  
Nirupama Stalin, Senior Transportation Planner <[nirupama.stalin@dot.ca.gov](mailto:nirupama.stalin@dot.ca.gov)>

G-8. This comment provides contact information for Tiffany Martinez at Caltrans. No further response is necessary.

"Provide a safe and reliable transportation network that serves all people and respects the environment!"



## LETTER H



October 14, 2024

Michael Coyne  
Principal Planner  
City of Santee  
10601 Magnolia Avenue  
Santee, CA 92071

Dear Mr. Coyne,

Thank you for the opportunity to review and provide comments on the Santee Town Center Specific Plan Update Draft Program Environmental Impact Report. Padre Dam Municipal Water District (PDMWD) reviewed the documents and offers the following comments:

Executive Summary – 4.18 Utilities and Service Systems

- H-1 • Future project specific studies/analyses may be necessary to determine improvements necessary to serve development projects depending on their connection point to existing infrastructure.
- H-2 • The section addressing wastewater capacity refers to Impact Fees paid to the City of Santee which does not appear to be relevant as the City of Santee does not contribute to wastewater capital improvements.
- H-3 • The Project would be subject to Padre Dam capacity fees to connect to the wastewater and/or water system at the time development occurs.

Section 3.3 – Chapter 4: Infrastructure and Public Facilities

- H-4 • Padre Dam receives water from the SDCWA through 3 connection points. CWA connection No.7 (secondary connection) should be included in the narrative.
- H-5 • Connections to transmission pipelines are not expected and it is more likely that connections will be to distribution pipelines.
- H-6 • The 27" sewer main referenced in this section is not owned or operated by Padre Dam but is a sewer interceptor main owned, operated, and maintained by the San Diego County Sanitation District. It is unlikely that connection to the interceptor main by a private development would be permitted.
- H-7 • The sewer CIP projects identified in the Padre Dam budget are intended to address maintenance needs and/or capacity issues in accordance with the 2022 master plan which did not contemplate the Project as defined in the DEIR. These projects may or may not be able to address the full capacity needs of the Project.

Section 4.18.1.2: Water Supply and Distribution System

- H-8 • PDMWD is not looking to expand its recycled water supply. The East County Advanced Water Purification project will be providing recycled water to PDMWD in the future at the

H-1. This comment states that future studies/analyses may be necessary to determine required utility improvements. Comment noted that future studies or analyses may be necessary and no changes to the Draft EIR are necessary.

H-2. This comment questions the relevancy of wastewater impact fees paid to the City because the City does not contribute to wastewater capital improvements. This information has been updated on page S-33 of the Revised Draft EIR to specify that wastewater impact fees are collected directly by Padre Dam. This revision does not change the analysis or conclusions of the Draft EIR.

H-3. This comment states that the project would be subject to Padre Dam capacity fees to connect to the wastewater and/or water system. Comment noted that future development would be subject to Padre Dam capacity fees.

H-4. This comment requests that three connection points be mentioned, specifically CWA connection No.7 (secondary connection). Revised Draft EIR page 3-20 has been updated to refer to a third connection point. This revision does not change the analysis or conclusions of the Draft EIR.

H-5. This comment states that connections to “distribution” pipelines (opposed to “transmission”) be mentioned. The text on pages 3-20 and 4.18-13 of the Revised Draft EIR has been updated to reflect “distribution” pipeline. This revision does not change the analysis or conclusions of the Draft EIR.

H-6. This comment requests that the 27-inch sewer main be clarified as owned by the San Diego County Sanitation District, not Padre Dam, and that it is unlikely that connections to the interceptor main by private development would be allowed. The text on page 3-22 of the Revised Draft EIR has been updated to reflect ownership of the 27-inch sewer main by the San Diego County Sanitation District. This revision does not change the analysis or conclusions of the Draft EIR.

H-7. This comment states that the sewer CIP projects identified may or may not address the full capacity needs of the project. This comment is noted. Future projects will be reviewed for sewer service adequacy and no change to the Draft EIR analysis or conclusions is necessary.

H-8. This comment states that Padre Dam is not looking to expand recycled water supply and that the East County Advanced Water Purification project would provide recycled water to Padre Dam in the future. Revised Draft EIR page 4.18-2 has been updated to omit reference to Padre Dam seeking expansion of its water supply. This revision does not change the analysis or conclusions of the Draft EIR.



- H-8 (cont.) • demand projected in our UWMP but does not anticipate increasing supply for recycled water.
- H-9 • There is a 2022 waste discharge order 2022-0103-DWQ that supersedes the 2006 order.
- H-10 • The referenced large diameter sewer (27") is not a Padre Dam facility but is a sewer interceptor owned, operated, and maintained by the San Diego County Sanitation District

H-11 If you have any question, please contact Lewis Clapp at (619) 258-4640 or by email at [lclapp@padre.org](mailto:lclapp@padre.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Lewis Clapp".

Lewis Clapp  
Director of Planning and Engineering

H-9. This comment states that there is a 2022 waste discharge order 2022-0103-DWQ that supersedes the 2006 order. This information has been updated on Revised Draft EIR page 4.18-9. This revision does not change the analysis or conclusions of the Draft EIR.

H-10. This comment clarifies that the large diameter sewer (27 inches) is not a Padre Dam facility but is a sewer interceptor owned, operated, and maintained by the San Diego County Sanitation District. The text on Draft EIR page 3-22 has been updated to reflect ownership of the 27-inch sewer main by the San Diego County Sanitation District. This revision does not change the analysis or conclusions of the Draft EIR.

H-11. This comment provides contact information for Lewis Clapp at Padre Dam Municipal Water District and no further response is required.

---

**From:** del@hcvineyards.com  
**Sent:** Wednesday, September 11, 2024 11:31 PM  
**To:** Michael Coyne  
**Subject:** RE: Santee Town Center Specific Plan Update Draft Program Environmental Impact Report Notice of Availability

Michael,

Please accept this statement as public comment:

H-1

I just wanted to say how impressed I am with the updated Town Center Specific Plan. It's clear that a lot of thought went into aligning the plan with the needs of Santee's commercial areas. The vision and detail in this plan are exactly what the community and businesses need to thrive. I'm genuinely excited about the opportunities this plan will bring and am looking forward to contributing to the success of the Town Center Commercial Neighborhood. Great work all around!

-Del Hanson, President, Lutapaj Inc.

---

**From:** Michael Coyne <mcoyne@CityofSanteeCa.gov>  
**Sent:** Friday, August 30, 2024 1:18 PM  
**To:** Michael Coyne <mcoyne@CityofSanteeCa.gov>  
**Subject:** FW: Santee Town Center Specific Plan Update Draft Program Environmental Impact Report Notice of Availability

Please see attached Notice of Availability for the City of Santee Town Center Specific Plan Update Draft Program Environmental Impact Report (DPEIR). The DPEIR, including an updated Town Center Specific Plan (August 2024 Draft), has been prepared and is available for public review. The documents can be downloaded from the following link:

<https://www.cityofsanteeca.gov/business/active-projects-map>

The 45-day public review period of the DPEIR begins August 30, 2024 and ends October 14, 2024. Following the end of the public review period, the City Council will consider and may certify the Program Environmental Impact Report and take other actions at a noticed public hearing on a date and time to be determined. Written and electronic comments addressing the DPEIR must be received no later than Monday, October 14, 2024 at 5 p.m. via e-mail or mail at the following address:

**Michael Coyne, Principal Planner**  
Subject: Town Center Specific Plan Update DPEIR  
Planning & Building Department, Santee City Hall, Building 4  
10601 Magnolia Avenue  
Santee, California 92071  
Phone: 619-258-4100 ext.160  
Email: [mcoyne@cityofsanteeca.gov](mailto:mcoyne@cityofsanteeca.gov)

I-1: This letter was received in support of the project, and no further response is required.

This page intentionally left blank

### 3.0 Draft EIR Clarifications and Revisions

Any corrections to the Draft Environmental Impact Report (EIR) recommended by the City of Santee (City) or in response to comments received are stated in this section of the Final EIR. The Draft EIR has also been modified and is re-published in its entirety as a single document to reflect these EIR modifications (see Volume II).

The information included in these revisions does not constitute substantial new information that requires recirculation of the Draft EIR. Section 15088.5 of the State CEQA Guidelines states in part:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:
  - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
  - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
  - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
  - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The changes to the Draft EIR included in these modifications do not constitute “significant” new information because:

- No new significant environmental impacts would result from the project or from a new mitigation measure.
- There is no substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the identified significant impacts to a level of insignificance.
- No feasible project alternative or mitigation measure considerably different from others previously analyzed has been proposed or identified that would clearly lessen the significant environmental impacts of the project.

- The Draft EIR is not fundamentally or basically inadequate or conclusory in nature such that meaningful public review and comment were precluded.

Therefore, recirculation of the Draft EIR is not required because the new information added to the EIR through these modifications clarifies information already provided or makes insignificant modifications to the already adequate Draft EIR.

The EIR modifications contained below are in the same order as the information that appears in the Draft EIR. Changes in text are signified by strikeouts (~~strikeouts~~) where text has been removed and by bold underline (**underline**) where text has been added. The applicable page numbers from the Draft EIR are also provided where necessary for easy reference.

## CHAPTER 1.0 – EXECUTIVE SUMMARY

- Two minor revisions to update the reference to the “San Diego ~~Green~~ **Copper** Line Trolley” are reflected on Revised Draft EIR pages S-2 and S-29.
- The utilities and service systems impact discussion on Revised Draft EIR page S-33 was updated to include the following sentence: **Wastewater impact fees are collected directly by Padre Dam Municipal Water District.**

## CHAPTER 1.0 – INTRODUCTION

No changes have been made to this Section of the Revised Draft EIR.

## CHAPTER 2.0 – ENVIRONMENTAL SETTING

No changes have been made to this Section of the Revised Draft EIR.

## CHAPTER 3.0 – PROJECT DESCRIPTION

- One minor revision to update the reference to the “San Diego ~~Green~~ **Copper** Line Trolley” is reflected on Revised Draft EIR page 3-1.
- Minor revisions to the Padre Dam Municipal Water District (PDMWD) description of existing facilities are reflected on Revised Draft EIR page 3-20 and provided below.

The PDMWD receives imported water from the San Diego County Water Authority via ~~two~~ **three** connections along Mission Gorge Road near Mission Trails Park, ~~and at the Lake Jennings Treatment Plant, and Connection No. 7 (secondary connection).~~ A large ~~transmission~~ **distribution** pipeline from the El Capitan Reservoir is also located beneath Mission Gorge Road. Minor upgrades to water ~~transmission~~ **distribution** facilities, including new connections and fire hydrants, would occur with new development within the TCSP area.

- A minor addition to specify existing sewer pipelines are owned by the San Diego County Sanitation District is reflected on Draft EIR page 3-22 and provided below.

There is a network of existing sewer pipelines throughout the TCSP area, including larger pipelines up to 27 inches in diameter near the intersection of

Town Center Parkway and Cuyamaca Street owned by the San Diego County Sanitation District.

## **CHAPTER 4.0 – ENVIRONMENTAL ANALYSIS**

No changes have been made to this Section of the Revised Draft EIR.

### **SECTION 4.1 – AESTHETICS**

No changes have been made to this Section of the Revised Draft EIR.

### **SECTION 4.2 – AGRICULTURE AND FORESTRY RESOURCES**

No changes have been made to this Section of the Revised Draft EIR.

### **SECTION 4.3 – AIR QUALITY**

No changes have been made to this Section of the Revised Draft EIR.

### **SECTION 4.4 – BIOLOGICAL RESOURCES**

- Minor additions to mitigation measures BIO-8 and BIO-9 are reflected on Revised Draft EIR pages 4.4-30 and 4.4-31 and provided below.

**BIO-8** If heavy equipment would be in operation during construction within the TCSP area, AEN, or Housing Element sites during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), pre-construction survey(s) shall be conducted by a qualified biologist, as appropriate, to determine whether these species occur within the areas potentially impacted by noise. If pre-construction surveys determine that active nests belonging to these species are absent from the potential noise impact area (within 300 feet for vireo or gnatcatcher, 500 feet for raptors, or as otherwise determined by a qualified biologist), clearing, grubbing, and grading shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to these species, then clearing, grubbing, and grading within 300 feet of the nest location(s) for vireo or gnatcatcher and 500 feet for raptors, shall: (1) be postponed until a permitted biologist determines the nest is no longer active; (2) be allowed to continue if nest monitoring by a qualified biologist determines that noise levels are not adversely affecting the nesting birds, or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the clearing, grubbing, or grading footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA hourly average or to the maximum hourly ambient noise level if it already exceeds 60 dBA at the nest location. Decibel output for Item (3) will be confirmed by a qualified noise specialist and intermittent monitoring by a qualified biologist will be required to ensure that conditions have not changed.

**BIO-9** If periodic noise (such as events) or continuous noise (such as mechanical equipment) generated by standard operational operation of land uses activities within the TCSP, AEN, or Housing Element sites 16A, 16B, 20A, and

20B will produce noise levels that will adversely affect nesting birds during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), activities nearby to suitable special-status species habitat on preserved land will be designed and implemented to minimize noise impacts to preserves and wildlife. Operational activities shall (1) be allowed to continue if a temporary noise barrier or berm is constructed at the edge of the suitable special-status species habitat to ensure that noise levels are reduced to below 60 A-weighted decibels (dBA) hourly average or the maximum hourly average ambient noise level measured existing ambient if it already exceeds 60 dBA at the edge of suitable habitat during the breeding season, or (2) operational activities that would be above 60 dBA Leq hourly at the edge of suitable habitat shall be allowed to continue with incorporation of noise reduction strategies in equipment, siting and site design, features, timing, noise barriers, landscaping, and buffer separation.

## SECTION 4.5 – CULTURAL RESOURCES

- Two minor additions were added to refer to aerial photographs from 1928 and 1929 on Revised Draft EIR page 4.5-17 and are provided below.

Various additional archival sources were also consulted for the entire project area, including historic topographic maps and aerial imagery. These include aerials from 1953, 1964, 1966, 1968, 1971, 1980, 1985, 1990, 1995, 2000, 2005, and 2010 (NETR Online 2022) and several historic USGS topographic maps, including the 1893 El Cajon (1:62,500), 1903 Cuyamaca (1:125,000), the 1942 El Cajon (1:62,500) and the 1955, 1967, 1975, and 1996 El Cajon (1:24,000) topographic maps; and the 1928 and 1929 County Assessor Tax Factor aerial photographs. The purpose of this research was to identify historic structures and land use in the area.

The earliest aerial photographs available are from the 1928 and 1929 County Assessor photograph series. These show Mission Gorge Road and Magnolia Avenue in their current alignments with a cluster of buildings at their intersection. Edgemoor Farm is shown including the Polo Barn and additional buildings associated with the Edgemoor Farm and San Diego County Home for the Aged and Indigent, as discussed in Section 4.5.1.7 above. The surrounding area attests to aerial photographs depict the agricultural nature of the region— several farm plots are visible within and around the project site.

- Minor additions to mitigation measure CUL-2 related to unanticipated resources and artifact disposition are reflected on Revised Draft EIR page 4.5-23 and provided below.

*Unanticipated Resources:* If previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with the Tribal monitor, shall determine the significance of the discovered prehistoric archaeological resources. The Project Archaeologist shall determine the significance of discovered historic-period archaeological resources. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and



features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field, and the monitored grading can proceed.

*Artifact Disposition:* The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Recovered cultural artifacts shall be curated with accompanying catalog to current professional repository standards or be returned to the appropriate Native American Tribe(s), as agreed upon by the Principal Investigator, Native American representative(s), and City staff.

## SECTION 4.6 – ENERGY

- One minor revision to update the reference to the “San Diego ~~Green~~ Copper Line Trolley” is reflected on Revised Draft EIR page 4.6-2.

## SECTION 4.7 – GEOLOGY AND SOILS

No changes have been made to this Section of the Revised Draft EIR.

## SECTION 4.8 – GREENHOUSE GAS EMISSIONS

No changes have been made to this Section of the Revised Draft EIR.

## SECTION 4.9 – HAZARDS AND HAZARDOUS MATERIALS

- One minor revision to update the reference to the project’s location relative to Gillespie Field Review Areas is reflected on Revised Draft EIR page 4.9-6 and provided below.

As shown in Figure 4.9-2b, the ~~northern~~ southern portion of the TCSP area and AEN are in Review Area 1, while the ~~southern~~ northern portion of the TCSP area and AEN and the Housing Element sites are within Review Area 2.

- One minor revision to update the land use actions subject to ALUC is reflected on Revised Draft EIR page 4.9-6 and provided below.

Within Review Area 1, all land use actions are subject to ALUC review, ~~except if the project:~~

~~Is “compatible” with both noise and safety compatibility policies;~~

~~Has received a final notice of determination from the Federal Aviation Administration (FAA) that the project would not constitute a hazard or obstruction to air navigation, to the extent applicable; and~~

~~Has been conditioned by the local agency to require an overflight notification.~~

- One minor revision to update compatibility standards on Revised Draft EIR page 4.9-20.

In Safety Zone 4 for Gillespie Field, new residential development at a density greater than 20 du/ac is “incompatible,” and new residential development between 4 and ~~16~~20 du/ac is “conditionally compatible” and subject to the requirements stated in the ALUCP.

- One minor revision to update reference to the Specific Plan Objective Design Standard is reflected on Revised Draft EIR page 4.9-21 and provided below.

Objective Design Standard ~~GJ, Aircraft Safety~~ Aviation Land Use Compatibility, in the proposed TCSP states that development proposals within Review Area 1 ~~Safety Zone 4~~ shall be routed to the Federal Aviation Administration for a determination of no hazard to air navigation and to the ALUC for consultation as part of the site-specific development review.

- Two minor revisions to replace the term “override” with “overrule” are reflected on Revised Draft EIR page 4.9-22 and provided below.

Further, after this ALUC consultation process is performed, the City Council could choose to ~~override~~ overrule the ALUCP density limitations in favor of a specific development proposal.

Even if the City were to ~~override~~ overrule the ALUCP density limitations, individual projects, as applicable would be required to obtain a FAA determination of No Hazard to Air Navigation and/or implement FAA conditions that would allow the FAA determination of No Hazard to Air Navigation consistent with TCSP Objective Design Standard G and the requirements for ministerial projects described in Section 3.4.2 of this EIR.

- Three revisions to clarify ALUC’s consistency review have been added to the TCSP, AEN, and Housing Element sites discussions on Revised Draft EIR pages 4.9-22 and 4.9-23 as follows:

#### **TCSP Area**

Since no development is proposed at this time, it is unknown whether the development of the TCSP would create an inconsistency with the ALUCP. As such, on January 9, 2025, ALUC found the TCSP project conditionally consistent with the ALUCP and imposed project conditions that future proposed development within the project area must comply with the residential dwelling units or people per acre as specified by the applicable safety zone.

#### **AEN**

Since no development is proposed at this time, it is unknown whether the development of the AEN would create an inconsistency with the ALUCP. As such, on January 9, 2025, ALUC found the AEN project conditionally consistent with the ALUCP and imposed project conditions that future proposed development within the project area must comply with the residential dwelling units or people per acre as specified by the applicable safety zone.

#### **Housing Element Sites**

Since no development is proposed at this time in the Housing Element sites, it is unknown whether the development of the Project would create an inconsistency with the ALUCP. However, since the project could allow development at densities exceeding ALUCP Safety Zone limitations, impacts under CEQA would be significant and unavoidable as discussed below.

## **SECTION 4.10 – HYDROLOGY AND WATER QUALITY**

No changes have been made to this Section of the Revised Draft EIR.

## **SECTION 4.11 – LAND USE AND PLANNING**

- One minor revision to update the reference to the “San Diego ~~Green~~ Copper Line Trolley” is reflected on Revised Draft EIR page 4.11-8.
- Two minor revisions to acknowledge the project’s ALUC review are reflected on Revised Draft EIR pages 4.11-9 and 4.11-10.

### **TCSP Area and AEN**

Conflicts with local planning documents are not anticipated and future development proposals within the TCSP area and AEN would still be subject to review for consistency with the City’s General Plan and SMC; however, it is possible that future development plans within the TCSP area and AEN within Gillespie Field Safety Zones 3 and 4 would not be entirely compatible with the ALUCPs due to residential density limitations. While no development is proposed at this time and ALUC found the TCSP project conditionally compatible on January 9, 2025. When development proposals do come forth, they would be required to complete consultation with the ALUC and depending on the ultimate density of the proposal, future development within could be found incompatible with the ALUCP. Therefore, at this level of program review, a significant impact would occur with respect to consistency with ALUCPs.

### **Housing Element Sites**

Impacts associated with conflicts with local land use plans for future development at the Housing Element sites would be less than significant, except with respect to compatible density within Gillespie Field Safety Zones 3 and 4. While no development is proposed at this time and ALUC found the TCSP project conditionally compatible on January 9, 2025, the potential for future development within the Housing Element sites to exceed the density limits for the corresponding airport safety zone remains, resulting in a significant and unavoidable impact under CEQA. ~~The potential for future development within the Housing Element sites to exceed the density limits for the corresponding airport safety zone could result in a significant and unavoidable impact after consultation with the ALUC.~~

- Two minor revisions to replace the term “override” with “overrule” are reflected on Revised Draft EIR page 4.11-10 and provided below.

The City is responsible for submitting the Application for a Consistency Determination to the Airport Authority. Airport staff would review and make recommendations to the ALUC as to the appropriate determination. The ALUC must act upon an application for a determination of consistency with an ALUCP within 60 days of the ALUC deeming such application complete. The City may ~~override~~ overrule an ALUC determination of inconsistency by a two-thirds vote of the City Council if it can make certain findings and provide a 45-day notice of the same to the ALUC and the California Department of Transportation per Public Utilities Code Section 21676.5(a). Where possible conflict between the residential density provisions mandated by state law and Airport Safety Zones are identified with a specific land use proposal, the ALUCP density limitations shall apply unless overridden by the City Council. Since this process is not unique to the City, it does not constitute a distinct or unusual constraint. Notwithstanding the potential ~~override~~ overrule of ALUCP density limitations, all future individual projects, including ministerial projects, would be required to obtain a FAA determination of No Hazard to Air Navigation and/or implement FAA conditions that would allow the FAA determination of No Hazard to Air Navigation consistent with TCSP Objective Design Standard G and the requirements for ministerial projects described in Section 3.4.2 of this EIR. Impacts associated with conflicts with local land use plans for future development at the Housing Element sites would be less than significant, except with respect to compatible density within Gillespie Field Safety Zones 3 and 4. The potential for future development within the Housing Element sites to exceed the density limits for the corresponding airport safety zone could result in a significant and unavoidable impact after consultation with the ALUC.

#### **SECTION 4.12 – NOISE**

No changes have been made to this Section of the Revised Draft EIR.

#### **SECTION 4.13 – POPULATION AND HOUSING**

No changes have been made to this Section of the Revised Draft EIR.

#### **SECTION 4.14 – PUBLIC SERVICES**

No changes have been made to this Section of the Revised Draft EIR.

#### **SECTION 4.15 – RECREATION**

No changes have been made to this Section of the Revised Draft EIR.

#### **SECTION 4.16 – TRANSPORTATION**

No changes have been made to this Section of the Revised Draft EIR.

#### **SECTION 4.17 – TRIBAL CULTURAL RESOURCES**

No changes have been made to this Section of the Revised Draft EIR.

## SECTION 4.18 – UTILITIES

- One minor revision to omit the following sentence is reflected on Revised Draft EIR page 4.18-2.

~~The District is additionally looking to expand its recycled water supply and increase potable reuse to provide drought-proof sources of water.~~

- Two minor revisions to the current 2022 Waste Discharge Requirement Order is reflected on Revised Draft EIR page 4.18-9.

### ~~2006~~ 2022 Waste Discharge Requirements Order

The State Water Resources Control Board (SWRCB) adopted Statewide General Waste Discharge Requirements for Sewer Systems (Order No. ~~2006~~2022-00030103-DWQ). The intent of the order is to regulate all collections systems in the state to reduce or eliminate the number of sanitary sewer overflows which, by their nature, pollute the environment. A sanitary sewer overflow is any overflow, spill, release, discharge, or diversion of wastewater from a sewer system. The order is applicable for all publicly-owned sewage collection systems with more than one mile of sewer pipe.

- One minor revision to revise the description of an existing pipeline is reflected on Revised Draft EIR page 4.18-2.

A large ~~transmission~~ distribution pipeline from the El Capitan Reservoir is also located beneath Mission Gorge Road. While future projects within the TCSP area would require connection to existing water pipelines, localized water utility infrastructure improvements and relocations would be evaluated upon submittal of project specific development plans.

## SECTION 4.19 – WILDFIRE

No changes have been made to this Section of the Revised Draft EIR.

## CHAPTER 5.0 – SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS/SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

No changes have been made to this Section of the Revised Draft EIR.

## CHAPTER 6.0 – GROWTH INDUCEMENT

No changes have been made to this Section of the Revised Draft EIR.

## CHAPTER 7.0 – CUMULATIVE IMPACTS

- One minor revision to update the reference to the “San Diego ~~Green~~ Copper Line Trolley” is reflected on Revised Draft EIR page 7-10.

**CHAPTER 8.0 – EFFECTS FOUND NOT TO BE SIGNIFICANT**

No changes have been made to this Section of the Revised Draft EIR.

**CHAPTER 9.0 – PROJECT ALTERNATIVES**

No changes have been made to this Section of the Revised Draft EIR.

**CHAPTER 10.0 – REFERENCES**

No changes have been made to this Section of the Revised Draft EIR.

## **4.0 Mitigation Monitoring and Reporting Program**

### **4.1 Introduction**

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for use in ensuring the implementation of the required mitigation for the Santee Town Center Specific Plan (project). The MMRP has been prepared in compliance with State law and the Santee Town Center Specific Plan Final Environmental Impact Report (EIR) (State Clearinghouse No. 2023090032).

The California Environmental Quality Act (CEQA) requires the adoption of a reporting or monitoring program for the measures that are placed on a project to mitigate or avoid adverse effects on the environment (California Public Resources Code, Section 21081.6). The law states that the reporting or monitoring program shall be designed to ensure compliance during project implementation. The monitoring program generally contains the following elements:

- 1) The mitigation measures are recorded with the action and procedure necessary to ensure compliance. In some instances, one action may be used to verify the implementation of several mitigation measures.
- 2) A procedure for compliance and verification has been outlined for each action necessary. This procedure designates who will take action, what action will be taken and when, and to whom and when compliance will be reported.
- 3) The program has been designed to be flexible. As monitoring progresses, changes to compliance procedures may be necessary based upon recommendations by those responsible for the program. As changes are made, new monitoring compliance procedures and records will be developed and incorporated into the program.

This MMRP includes mitigation measures outlined in the Final EIR.

### **4.2 Mitigation Monitoring and Responsibilities**

As the Lead Agency, the City of Santee (City) is responsible for ensuring full compliance with the mitigation measures adopted for the project. The City will monitor and report on all mitigation activities.

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<b>Aesthetics</b>			
Scenic Vistas	<b>CUL-5:</b> Avoidance is the preferred measure to mitigate adverse effects to the Edgemoor Polo Barn. Future plans must design around the Polo Barn consistent with the TCSP “Historic Site Adjacency” Objective Design Standard. If avoidance is not possible, the preferred alternative is to preserve the Polo Barn by moving it to another location in accordance with mitigation measures previously published by Bull and Price, as referenced in the Cultural Resources Report (HELIX 2024b; Appendix D).	Prior to the issuance of any permit for future development on Site 20A.	City of Santee
Visual Character or Quality	Refer to CUL-5 above.	Refer to CUL-5 above.	City of Santee
<b>Air Quality</b>			
Cumulative Net Increases of Criteria Pollutants	<b>AQ-1:</b> Use of electrically powered landscape equipment. Electric receptacles/outlets shall be installed at the exterior of all single-family units, all multi-family buildings (including those with affordable units), and all common area buildings, so that homeowners and landscape contractors hired by the	Prior to the issuance of any permit for a development in the TCSP area or AEN (excluding the Housing Element sites).	City of Santee



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	homeowners' association may utilize electrically powered lawnmowers, leaf blowers, and chainsaws. Project plans shall include: (1) all necessary receptacles/outlets; and (2) a note that states "All landscape maintenance contracts provided by the applicable homeowners association must require that landscape contractors use electrically powered lawn mowers, leaf blowers, and chain saws." City staff must verify both requirements prior to approval of the final plans.		
<b>Biological Resources</b>			
Sensitive Species	<b>BIO-1:</b> Focused surveys for smooth tarplant will be completed during the blooming period for this species (April to September) before clearing and grubbing for development of sites 16A, 16B, 20A, and 20B. Smooth tarplant observed in a proposed impact area will be flagged and avoided during construction. If impacts to smooth tarplant individuals cannot be avoided, mitigation will consist of on- or off-site preservation, translocation, and/or restoration within a BRCA,	Prior to clearing and grubbing for site development in Housing Element sites 16A, 16B, 20A, and 20B.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	with a preference for species salvage and transplantation on-site if feasible, as determined by a qualified biologist and approved by the City. Seed material will be sourced from within 25 miles of the project area, but if seed is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used. If species are transplanted for mitigation, these species will be included in a plant salvage and translocation plan according to mitigation measure BIO-2.		
	<b>BIO-2:</b> Prior to vegetation clearing for development of the sites 16A, 16B, 20A, and 20B, if smooth tarplant is being impacted and translocation is selected as part of the mitigation package according to mitigation measure BIO-1, a plant salvage and translocation plan shall be prepared for smooth tarplant impacted by the project. The plan shall, at a minimum, evaluate options for plant salvage and relocation, including native plant mulching, selective soil salvaging, and application/relocation	Prior to clearing and grubbing for site development in Housing Element sites 16A, 16B, 20A, and 20B.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	of resources within the project area. Relocation efforts may include seed collection and/or transplantation to a suitable receptor site and will be based on the most reliable methods of successful relocation. The program shall contain a recommendation for method of salvage and relocation/application based on the feasibility of implementation and the likelihood of success. The program shall include, at a minimum, an implementation plan, maintenance and monitoring program, success criteria, estimated completion time, and any relevant contingency measures. The resource salvage plan shall be prepared by a qualified biologist and shall be implemented according to the Mitigation Monitoring and Reporting Program for the project, to the satisfaction of the City.		
	<b>BIO-3:</b> To help ensure errant impacts to sensitive vegetation communities and jurisdictional waters outside of the impact footprint are avoided during construction in the Housing Element sites, environmental	<ul style="list-style-type: none"> <li>Fencing installation prior to clearing and grubbing for site development in Housing Element sites 16A, 16B, 20A, and 20B.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>exclusionary fencing, where determined necessary by the qualified biologist, would be installed at the edges of the impact limits before the initiation of grading. All construction staging shall occur within the approved limits of construction. A qualified biologist will monitor the installation of environmental fencing wherever it would abut sensitive vegetation communities.</p> <p>The biologist will periodically monitor the limits of construction operations to ensure that avoidance areas are delineated with temporary fencing and that fencing remains intact. Unless otherwise determined by the monitoring biologist, periodically means once every 14 days after environmental exclusionary fencing has been installed at the edges of the impact limits.</p>	<ul style="list-style-type: none"> <li>Monitoring during project construction in in Housing Element sites 16A, 16B, 20A, and 20B.</li> </ul>	
	<p><b>BIO-4:</b> Prior to vegetation clearing for development of the Housing Element sites a qualified biologist shall conduct a Worker Environmental Awareness Program (WEAP) training</p>	<p>Prior to clearing and grubbing for site development in Housing Element sites 16A, 16B, 20A, and 20B.</p>	<p>City of Santee</p>

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of the Endangered Species Acts (FESA and CESA), the penalties associated with violating the provisions of the acts, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project area boundaries.</p>		
	<p><b>BIO-5:</b> Immediately following completion of temporary construction activities within the TCSP area, AEN, and Housing Element sites, the contractor shall restore the temporary impact areas to pre-construction contours and revegetate the areas with native plant material, as follows: excavated soils and cleared native plant material shall be stockpiled within an appropriate staging area along the edge of the work corridor to the extent feasible; excavated soils shall be backfilled upon completion of construction and</p>	<ul style="list-style-type: none"> <li>• Initiation of restoration and revegetation immediately following completion of temporary construction activities in the TCSP area, AEN, or Housing Element sites.</li> <li>• Maintenance and monitoring of the revegetation shall be provided for a period up to 25 months.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>recontoured to pre-existing conditions; cleared native plant material shall be distributed over the temporarily disturbed areas; native seed application and installation of native container plants. Plant and seed material will be sourced from within 25 miles of the project area, but if plant and seed material is not available, due to seasonality or a poor seeding year, seed collected from southeastern San Diego County may be used.</p> <p>Maintenance and monitoring of the revegetation shall be provided for a period up to 25 months or for a period sufficient to establish native plant material and to provide vegetative cover that prevents soil erosion. Appropriate landscaping will be selected based on the vegetation communities within the portion of the study area adjacent to the project. In areas supporting native (or disturbed native) vegetation communities, revegetation of temporarily impacted areas will be with appropriate native plant materials. Only non-invasive plant species will be included in the</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>revegetation plans (species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council ([Cal-IPC] 2024). A qualified landscape architect and/or qualified biologist shall review landscape plant palettes prior to implementation to ensure that no invasive species are included. Any planting stock brought onto the project area shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to, Argentine ants (<i>Linepithema humile</i>) and South American fire ants (<i>Solenopsis invicta</i>). Inspections of planting stock for habitat revegetation shall be by a qualified biologist. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices (BMPs) by qualified personnel, in a manner that precludes invasions into natural habitats. Temporary irrigation via irrigation lines and appurtenances (or alternate method approved by the City and qualified biologist) shall be provided by the contractor for a</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>period sufficient to establish plant material and to provide vegetative cover that prevents soil erosion. Irrigation shall be performed in a manner that avoids runoff, seepage, and overspray onto adjacent properties, non-irrigated areas, walls, roadways, waterways, or structures.</p>		
	<p><b>BIO-6:</b> Applications for future development outside of sites 16A, 16B, 20A, and 20B, where the City has determined a potential for impacts to sensitive biological resources, shall be required to comply with the following mitigation measure:</p> <p>a. Prior to issuance of any construction permit or any earth-moving activities, a site specific general biological resources survey shall be conducted to identify the presence of any sensitive biological resources, including any sensitive plant or wildlife species. A biological resources report shall be submitted to the City to document the results of the biological resources survey. The report shall include (1) the methods</p>	<ul style="list-style-type: none"> <li>• Perform site specific survey prior to the issuance of any permit for development in the TCSP area or AEN (excluding the Housing Element sites).</li> <li>• Perform described awareness, management, and monitoring activities during project construction in the TCSP area or AEN (excluding the Housing Element sites).</li> </ul>	City of Santee



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>used to determine the presence of sensitive biological resources; (2) vegetation mapping of all vegetation communities and/or land cover types; (3) the locations of any sensitive plant or wildlife species; (4) an evaluation of the potential for occurrence of any listed, rare, and narrow endemic species; and (5) an evaluation of the significance of any potential direct or indirect impacts from the proposed project. If suitable habitat for sensitive species is identified based on the general biological survey, then focused presence/absence surveys shall be conducted in accordance with applicable resource agency survey protocols and incorporated into the biological resources report. If potentially significant impacts to sensitive vegetation communities and biological resources are identified, project-level grading and site plans shall incorporate project design features to avoid or minimize direct impacts on</p>		

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>sensitive biological resources to the extent feasible, and the report shall also recommend appropriate mitigation to reduce the impacts to below a level of significance, where feasible. Mitigation measures shall be consistent with the standards contained in the Santee Subarea Plan, and projects shall be required to obtain all necessary permits to ensure compliance with applicable federal, state, and local regulations, such as the federal and state Endangered Species Acts. Mitigation ratios for sensitive vegetation community impacts are:</p> <ul style="list-style-type: none"> <li>• Wetland habitats – 3:1 ratio</li> <li>• Diegan coastal sage scrub – 2:1 ratio</li> <li>• Non-native grassland – 0.5:1 ratio</li> </ul> <p>Mitigation ratios shall be doubled for sensitive vegetation community impacts within the Preserve and Open Space System designated by the Santee Subarea Plan, once adopted.</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>b. Environmentally Sensitive Areas shall be identified in the biological resources report and avoided to the maximum extent practicable. In areas near or adjacent to Environmentally Sensitive Areas (i.e., natural habitats and vegetation, wetlands, wildlife areas, wildlife corridors), the biological resources report will consider the following measures:</p> <p><i>Avoidance of Environmentally Sensitive Areas.</i> In areas near or adjacent to Environmentally Sensitive Areas, construction limits shall be clearly demarcated using highly visible barriers (such as silt fencing), which shall be installed under the supervision of a qualified biologist prior to the commencement of work. Construction personnel shall strictly limit their activities, vehicles, equipment, and construction materials to the project footprint, including designated staging areas, and routes of travel. The construction areas shall be limited to the</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>minimal area necessary to complete the proposed project. The fencing shall remain in place until the completion of all construction activities and shall be promptly removed when construction is complete.</p> <p><i>Biological Monitoring.</i> A qualified biological monitor shall conduct construction monitoring of all work conducted within/adjacent to environmentally sensitive areas during all vegetation removal and ground-disturbing activities such as staging and grading, for the duration of the proposed project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside the project footprints and to survey for sensitive wildlife species. When vegetation removal and ground-disturbing activities are not occurring, as needed monitoring at the project areas shall occur.</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><i>Worker Environmental Awareness Program.</i> In areas near or adjacent to Environmentally Sensitive Areas, a qualified biologist shall conduct a WEAP training session for project and construction personnel prior to the commencement of work. The training shall include a description of the species of concern and their habitats, the general provisions of the Endangered Species Acts (FESA and CESA), the penalties associated with violating the provisions of the acts, the general measures that are being implemented to conserve the species of concern as they relate to the project, and the access routes to and project area boundaries.</p> <p><i>Best Management Practices.</i> During future project construction activities, the following BMPs shall be implemented:</p> <ul style="list-style-type: none"> <li>• All equipment maintenance, staging, and dispensing of</li> </ul>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>fuel, oil, or any other such activities shall occur in developed or designated non-sensitive upland habitat areas. The designated upland areas shall be located to prevent runoff from any spills from entering Waters of the US.</p> <ul style="list-style-type: none"> <li>• A construction Storm Water Pollution Prevention Plan (SWPPP) and a soil erosion and sedimentation plan shall be developed (where requirements are met) to minimize erosion and identify specific pollution prevention measures that shall eliminate or control potential point and nonpoint pollution sources onsite during and following the project construction phase. The SWPPP shall identify specific BMPs during project construction to prevent any water quality standard exceedances. In addition, the SWPPP shall contain provisions for changes to the plan such as alternative</li> </ul>		

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>mechanisms, if necessary, during project design and/or construction to achieve the stated goals and performance standards.</p> <ul style="list-style-type: none"> <li>• Trash shall be stored in closed containers so that it is not readily accessible to scavengers and shall be removed from the construction site on a daily basis.</li> <li>• Water quality shall be visually monitored by the biological monitor to ensure that no substantial increases in turbidity occur during construction. All relevant natural resource permits and authorizations shall be obtained from appropriate agencies (i.e., USACE, RWQCB, and CDFW) prior to the initiation of construction activities. Permit conditions contained within the permits and authorizations shall be employed throughout the duration of the project.</li> </ul>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<ul style="list-style-type: none"> <li>Hydrologic connectivity shall be maintained within drainages during the duration of construction. Brush, debris material, mud, silt, or other pollutants from construction activities shall not be placed within drainages and shall not be allowed to enter a flowing stream.</li> <li>Dust control measures shall be implemented by the contractor to reduce excessive dust emissions. Dust control measures shall be carried out at least two times per day on all construction days, or more during windy or dry periods, and may include wetting work areas, the use of soil binders on dirt roads, and wetting or covering stockpiles.</li> <li>No pets shall be allowed in, or adjacent to, the project areas.</li> <li>Rodenticides, herbicides, insecticides, or other chemicals that could potentially harm wildlife or</li> </ul>		



**Table 4-1**  
**Mitigation Monitoring and Reporting Program**

Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>native plants shall not be used near or within Environmentally Sensitive Areas within or near the roadway segments.</p> <ul style="list-style-type: none"> <li>• Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site during construction.</li> <li>• The cleaning of equipment will occur at least 300 feet from Environmentally Sensitive Area fencing.</li> <li>• Use of Native Plants. All project-related planting and landscaping shall not use plants listed on California Invasive Plant Council. Locally native plants shall be used near open space and native areas to the greatest extent feasible.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><b>BIO-7:</b> Grubbing or clearing of vegetation within the TCSP area, AEN, or Housing Element sites during the general avian breeding season (February 1 to September 15), least Bell's vireo breeding season (March 15 to September 15), coastal California gnatcatcher breeding season (March 1 to August 15), or raptor breeding season (January 15 to July 15) shall be avoided to the extent feasible. If grubbing, clearing, or grading would occur during the breeding season, a pre-construction survey shall be conducted by a qualified biologist no more than three days prior to the commencement of activities to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within 300 feet of the survey area (500 feet for raptors), clearing, grubbing, and grading shall be allowed to proceed in that area. Furthermore, if clearing, grubbing, or grading activities are to resume in an area where they have not occurred for a period of seven or</p>	<ul style="list-style-type: none"> <li>• Perform pre-construction surveys no more than 3 days prior to clearing and grubbing for site development in the TCSP area, AEN, or Housing Element sites.</li> <li>• Implement avoidance measures during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee

**Table 4-1  
Mitigation Monitoring and Reporting Program**

Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>more days during the breeding season, an updated survey for avian nesting will be conducted by a qualified biologist within three days prior to the commencement of clearing, grubbing, or grading activities in that area. If active nests or nesting birds are observed within 300 feet of the survey area (500 feet for raptors), the biologist shall flag a buffer around the active nests, and clearing, grubbing, or grading activities shall not occur within 300 feet of active nests (500 feet for raptors) until nesting behavior has ceased, nests have failed, or young have fledged as determined by a qualified biologist. If the qualified biologist determines that the species will not be impacted with a reduced buffer (i.e., less than 300 feet for general avian species and 500 feet for raptors), potentially with the implementation of avoidance measures to reduce noise, as necessary, and/or the qualified biologist monitors the active nest during clearing, grubbing, or grading to ensure no impacts to the species occur, these activities may occur</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	outside the reduced buffer during the breeding season, as long as the species is not impacted.		
	<b>BIO-8:</b> If heavy equipment would be in operation during construction within	<ul style="list-style-type: none"> <li>Perform pre-construction survey prior to clearing and</li> </ul>	City of Santee
	the TCSP area, AEN, or Housing Element sites during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), pre-construction survey(s) shall be conducted by a qualified biologist, as appropriate, to determine whether these species occur within the areas potentially impacted by noise. If pre-construction surveys determine that active nests belonging to these species are absent from the potential noise impact area (within 300 feet for vireo or gnatcatcher, 500 feet for raptors, or as otherwise determined by a qualified biologist), clearing, grubbing, and grading shall be allowed to proceed. If pre-construction surveys determine the presence of active nests belonging to these species, then clearing,	<ul style="list-style-type: none"> <li>grubbing for site development in the TCSP area, AEN, or Housing Element sites.</li> <li>Implement avoidance measures during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>grubbing, and grading within 300 feet of the nest location(s) for vireo or gnatcatcher and 500 feet for raptors, shall: (1) be postponed until a permitted biologist determines the nest is no longer active; (2) be allowed to continue if nest monitoring by a qualified biologist determines that noise levels are not adversely affecting the nesting birds, or (3) not occur until a temporary noise barrier or berm is constructed at the edge of the clearing, grubbing, or grading footprint and/or around the piece of equipment to ensure that noise levels are reduced to below 60 dBA hourly average or to the maximum hourly average ambient noise level if it already exceeds 60 dBA at the nest location. Decibel output for Item (3) will be confirmed by a qualified noise specialist and intermittent monitoring by a qualified biologist will be required to ensure that conditions have not changed.</p>		
	<p><b>BIO-9:</b> If periodic noise (such as events) or continuous noise (such as mechanical equipment) generated by standard operation of land uses</p>	<ul style="list-style-type: none"> <li>• During design for site development in the TCSP area, AEN, or Housing Element sites.</li> <li>•</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>within the TCSP, AEN, or Housing Element sites 16A, 16B, 20A, and 20B will produce noise levels that will adversely affect nesting birds during the breeding season for least Bell's vireo (March 15 to September 15), coastal California gnatcatcher (March 1 to August 15), or raptors (January 15 to July 15), activities nearby to suitable special-status species habitat on preserved land will be designed and implemented to minimize noise impacts to preserves and wildlife. Operational activities shall be allowed to continue if a noise barrier or berm is constructed at the edge of the suitable special-status species habitat to ensure that noise levels are reduced to below 60 dBA hourly average or the maximum hourly average ambient noise level if it already exceeds 60 dBA at the edge of suitable habitat during the breeding season.</p>	<ul style="list-style-type: none"> <li>Maintain sound levels during operation in the TCSP area, AEN, or Housing Element sites.</li> </ul>	

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><b>BIO-10:</b> A focused pre-construction survey for special status animal species will be completed by a qualified biologist prior to clearing and grubbing within the TCSP area, AEN, or sites 16A, 16B, 20A, and 20B. Aside from birds, which are covered by other mitigation measures, this survey will focus on the special status animal species identified as having high potential to occur on-site: western spadefoot</p>	<ul style="list-style-type: none"> <li>• Perform pre-construction survey prior to clearing and grubbing for site development in the TCSP area, AEN, or Housing Element sites.</li> <li>• Implement avoidance measures during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee
	<p>toad, San Diegan legless lizard, California glossy snake, Belding's orange-throated whiptail, San Diegan tiger whiptail, red diamond rattlesnake, Blainville's horned lizard, and two-striped garter snake. Occupied special status species habitat observed in the proposed impact area will be flagged and avoided during construction until the qualified biologist determines that special status species are no longer using the habitat.</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Sensitive Vegetation Communities	Refer to BIO-3 through BIO-6 above.	Refer to BIO-3 through BIO-6 above.	City of Santee
	<p><b>BIO-11:</b> Applications where the City has determined a potential for impacts to jurisdictional waters and wetlands shall be required to comply with the following permitting and mitigation framework.</p> <p>Before the issuance of any construction permit or any earth-moving activities, a site specific general biological resources survey (BIO-6) shall be conducted to identify the presence of any sensitive biological resources, including any wetlands. Should any potential jurisdictional waters or wetlands be identified on-site during the general biological resources survey, then a jurisdictional wetlands delineation shall be conducted following the methods outlined in the USACE's 1987 Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region or most current USACE guidance. The limits of any riparian habitats on-site</p>	<ul style="list-style-type: none"> <li>Perform wetland delineation prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.</li> <li>Implement avoidance measures during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites that may not meet federal jurisdictional criteria but are regulated by the RWQCB.</p> <p>Avoidance measures based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to jurisdictional waters consistent with federal, state, and City guidelines. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and would be subject to alternatives and mitigation analyses consistent with the USACE's and RWQCB's permit processes. Unavoidable impacts would require the project to submit permit applications to the USACE under CWA Section 404, the RWQCB under CWA Section 401 and/or the State Porter-Cologne Water Quality Control Act, and/or the CDFW under CFG Code Sections 1600 et seq., depending on the jurisdictional resources impacted. The permits issued for the project will set the mitigation requirements,</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>which typically require the in-kind creation of new wetland of the same type lost, at a ratio determined by the applicable regulatory agencies that would prevent any net loss of wetland functions and values. (See mitigation measure BIO-12 for the proposed mitigation package for the Riverview Parkway Project.) Wetland creation on-site or within the same wetland system should be given preference over replacement off-site or within a different system. The City shall also control use and development in surrounding areas of influence to wetlands with the application of buffer zones as may be required for wetlands pursuant to federal and/or state permits in accordance to the Land Use Adjacency Guidelines, conservation measures and wetland protection standards in the Draft Subarea Plan Chapter 5. Use and development within buffer areas shall be limited to minor passive recreational uses, such as trails, with fencing, desiltation, or erosion control facilities, or other improvements deemed necessary to protect the</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	habitat, to be located in the upper (upland) half of the buffer when feasible. All wetlands and buffers shall be permanently conserved or protected through the application of an open space easement or other suitable device.		
	<b>BIO-12:</b> Site 16A would result in impacts to 0.37 acre of wetland and non-wetland waters of the U.S., 0.37 acre of wetland and non-wetland waters of the State, and 1.18 acres CDFW Jurisdictional Habitat. By re-aligning and widening the Las Colinas Channel, mitigation will comprise creation of 0.74 acre waters of the	During project construction in Housing Element site 16A.	City of Santee
	U.S., 0.74 acre waters of the State, and 1.24 acres riparian habitat. Additionally, 0.08 acre of existing waters of the U.S./State that would be temporarily affected by recontouring (will remain within the widened Las Colinas Channel) will also be revegetated and maintained.		
Wetlands	Refer to BIO-3, BIO-4, BIO-6, BIO-11, and BIO-12 above.	Refer to BIO-3, BIO-4, BIO-6, BIO-11, and BIO-12 above.	City of Santee
Habitat Conservation Planning	Refer to BIO-6 and BIO-11 above.	Refer to BIO-6 and BIO-11 above.	City of Santee
Policies and Ordinances Protecting Biological Resources	Refer to BIO-5 through BIO-8, BIO-11, and BIO-12 above.	Refer to BIO-5 through BIO-8, BIO-11, and BIO-12 above.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
<b>Cultural Resources</b>			
Historic Resources	<p><b>CUL-1:</b> Prior to approval of an individual project (including the four Housing Element sites) under the TCSP area or AEN, a cultural resources survey shall be conducted for that project. If cultural resources are identified in conjunction with the cultural resources survey, they must be evaluated to assess their eligibility for the CRHR and, thus, whether the project would have an effect on historic properties (cultural resources) per CEQA. If significant effects to historic properties/cultural resources are identified, appropriate avoidance or mitigation measures must be developed as part of the cultural resources study and implemented prior to project development.</p>	Prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><b>CUL-2:</b> Prior to issuance of grading permits for any projects (including the Housing Element sites) within the TCSP area or AEN: The applicant/developer shall provide evidence to the City of Santee that a qualified professional archaeologist has been contracted to implement a Cultural Resources Management Plan (CRMP), the City must agree to the selected archaeologist and agree to the implementation prescribed in the CRMP. A CRMP shall be developed in coordination with the consulting tribe(s) that addresses the details of all activities and provides procedures that must be followed to reduce the impacts to cultural and historic resources to a level that is less than significant, as well as address potential impacts to undiscovered buried archaeological resources associated with this project.</p>	<ul style="list-style-type: none"> <li>• Prepare CRMP prior to the issuance of a grading permit for development in the TCSP area, AEN, or Housing Element sites.</li> <li>• Implement training and monitoring during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>For each construction project within the TCSP, AEN, or Housing Element sites, the CRMP shall contain, at a minimum, the following:</p> <p><u>Archaeological Monitoring:</u> An adequate number of qualified archaeological monitors shall be on site to ensure all earth-moving activities are observed in areas being monitored. This includes all grubbing, grading, and trenching on-site and for all off-site improvements. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined and directed by the Project Archaeologist.</p> <p><u>Cultural Resources Sensitivity Training:</u> The Project Archaeologist and a representative designated by the consulting Tribe(s) shall attend the pre-grading meeting with the contractors to provide Cultural Resources Sensitivity Training for all construction personnel. Training will include a brief review of the cultural</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>sensitivity of the project and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earth-moving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This is a mandatory training, and all construction personnel must attend prior to beginning work on the project site.</p> <p><u>Unanticipated Resources:</u> If previously unidentified potentially significant cultural resources are discovered, the Archaeological and/or Tribal Monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. The Project Archaeologist, in consultation with</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>the Tribal monitor, shall determine the significance of discovered prehistoric archaeological resources. The Project Archaeologist shall determine the significance of discovered historic-period archaeological resources. Further, before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The Project Archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis. Isolates and clearly non-significant deposits shall be minimally documented in the field, and the monitored grading can proceed.</p> <p><u>Artifact Disposition:</u> The landowner(s) shall relinquish ownership of all cultural resources that are unearthed on the project property during any ground-disturbing activities, including previous investigations and/or Phase III data recovery. Recovered cultural artifacts shall be curated with</p>		



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>accompanying catalog to current professional repository standards or be returned to the appropriate Native American Tribe(s), as agreed upon by the Principal Investigator, Native American representative(s), and City staff.</p>		
	<p><b>CUL-3:</b> Prior to the issuance of grading permits, the developer/permit applicant shall enter into an agreement(s) with the consulting tribe(s) for a Kumeyaay Native American Monitor(s).</p> <p>In conjunction with the Archaeological monitor(s), the Kumeyaay Native American Monitor(s) shall attend the pre-grading meeting with the contractors to provide Cultural Resources Sensitivity Training for all construction personnel. In addition, an adequate number of Kumeyaay Native American Monitor(s) shall be on-site during all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, grading, and trenching. In</p>	<ul style="list-style-type: none"> <li>• Enter into agreement prior to the issuance of a grading permit for development in the TCSP area, AEN, or Housing Element sites.</li> <li>• Monitor during project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>conjunction with the archaeological monitor(s), the Kumeyaay Native American Monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources.</p>		
	<p><b>CUL-4:</b> In the event that potential human remains are encountered, ground-disturbing activities within 100 feet of the discovery will be halted, and the requirements of California Health and Safety Code Section 7050.5 will be implemented. The archaeological monitor will immediately notify the Project Archaeologist, who will notify the County Medical Examiner's (ME's) Office. A representative of the ME's Office will determine whether the human remains appear to be Native American in origin. If so, the ME's Office will notify the Native American Heritage Commission (NAHC) who will designate the Most Likely Descendant (MLD). The MLD will make recommendations for the appropriate treatment of the remains</p>	<p>During project construction in the TCSP area, AEN, or Housing Element sites.</p>	<p>City of Santee</p>

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	and any associated grave goods. The County ME's office will make the determination of the origin of the remains within two working days and will notify the NAHC within 24 hours of their decision if the human remains are determined to be Native American. In the event human remains or burial items are discovered, all parties will refrain from publicly disclosing the reburial location unless otherwise required by law.		
	Refer to CUL-5 above.	Refer to CUL-5 above.	City of Santee
Archaeological Resources	Refer to CUL-1 through CUL-4 above.	Refer to CUL-1 through CUL-4 above.	City of Santee
Human Remains	Refer to CUL-4 above.	Refer to CUL-4 above.	City of Santee
<b>Geology/Soils</b>			
Paleontological Resources and Unique Geology	<b>GEO-1:</b> To address potential impacts to paleontological resources, the City shall review the project application materials including the geotechnical report to determine if project grading has the potential to disturb geologic formations with the potential to contain paleontological resources. As part of the grading application process, the City may request information from the applicant such	<ul style="list-style-type: none"> <li>Determine sensitivity prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.</li> <li>Monitor and recover during project construction in the TCSP area, AEN, or Housing Element sites.</li> <li>Manage, report, and curate after project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>as the depth of grading, geologic formations, and paleontological sensitivity in order to determine the potential for impacts. In the event grading may disturb geologic formations with a moderate or high potential to contain paleontological resources, the following monitoring program shall be implemented prior to and during grading operations:</p> <ol style="list-style-type: none"> <li>1. Preconstruction Personnel and Repository: Prior to the commencement of construction, a qualified project paleontologist shall be retained to oversee the mitigation program. A qualified project paleontologist is a person with a doctorate or master's degree in paleontology or related field and who has knowledge of the County of San Diego paleontology and documented experience in professional paleontological procedures and techniques. In addition, a regional fossil repository, such as the San Diego Natural History Museum, shall be designated by the City of Santee to receive any discovered fossils.</li> </ol>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>2. Preconstruction Meeting: The project paleontologist shall attend the preconstruction meeting to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.</p> <p>3. Preconstruction Training: The project paleontologist shall conduct a paleontological resource training workshop to be attended by earth excavation personnel.</p> <p>4. During-Construction Monitoring: A project paleontologist or paleontological monitor shall be present during all earthwork in formations with moderate to high paleontological sensitivity. A paleontological monitor (working under the direction of the project paleontologist) shall be on site on a full-time basis during all original cutting of previously undisturbed deposits.</p> <p>5. During-Construction Fossil Recovery: If fossils are discovered, the project paleontologist (or paleontological</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>monitor) shall recover them. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.</p> <p>6. Post-Construction Treatment: Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged.</p> <p>7. Post-Construction Curation: Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in the designated fossil repository.</p> <p>8. Post-Construction Final Report: A final summary paleontological mitigation report that outlines the results of the</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	mitigation program shall be completed and submitted to the City of Santee within two weeks of the completion of each construction phase of the proposed project. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils.		
	<p><b>GEO-2:</b> If fossils are inadvertently discovered anywhere in the TCSP area, the construction contractor shall immediately stop all activities within 100 feet of the fossil and notify the City within 24 hours of the find. Before work can proceed within 100 feet of the find, a project paleontologist (or paleontological monitor) shall be hired to monitor construction activities and recover the fossils. In most cases, fossil salvage can be completed in a short period of time. However, some fossil specimens (e.g., a bone bed or a complete large mammal skeleton) may require an extended salvage</p>	<ul style="list-style-type: none"> <li>• Monitor and recover during project construction in the TCSP area, AEN, or Housing Element sites.</li> <li>• Manage, report, and curate after project construction in the TCSP area, AEN, or Housing Element sites.</li> </ul>	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>period. In these instances, the project paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner.</p> <ol style="list-style-type: none"> <li>1. Post-Construction Treatment: Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, and cataloged.</li> <li>2. Post-Construction Curation: Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited in the designated fossil repository.</li> <li>3. Post-Construction Final Report: A final summary paleontological mitigation report that outlines the results of the mitigation program shall be completed and submitted to the City of Santee within two weeks of the completion of each construction phase of the proposed project. This report shall include discussions of the methods used, stratigraphic section(s)</li> </ol>		



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	exposed, fossils collected, inventory lists of cataloged fossils, and significance of recovered fossils.		
<b>Greenhouse Gas Emissions</b>			
Greenhouse Gas Emissions	<b>GHG-1:</b> New residential construction shall meet or exceed California Green Building Standards Tier 2 Voluntary Measures, such as obtaining green building ratings including LEED, Build it Green, or Energy Star Certified building certification in scoring development and explain the measures implemented.	Prior to the issuance of any permit for development in the Housing Element sites.	City of Santee
	<b>GHG-2:</b> The project shall utilize tree planting for shade and energy efficiency such as tree planting in parking lots and streetscapes.	Prior to the issuance of any permit for development in the Housing Element sites.	City of Santee
	<b>GHG-3:</b> The project shall install electric vehicle chargers for 13 percent of total parking provided.	Prior to the issuance of any permit for development in the Housing Element sites.	City of Santee
	<b>GHG-4:</b> The project shall provide exterior recycling storage space in accordance with California Green Building Standards and the Santee Municipal Code.	Prior to the issuance of any permit for development in the Housing Element sites.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<b>GHG-5:</b> The project shall install at least 1 kilowatt per unit of photovoltaic solar systems, unless the installation is infeasible due to poor solar resources established in a solar feasibility study prepared by a qualified consultant submitted with an applicant's formal project submittal to City.	Prior to the issuance of any permit for development in the Housing Element sites.	City of Santee
Policies, Plans, and Regulations Intended to Reduce GHG Emissions	Refer to GHG-1 through GHG-5 above.	Refer to GHG-1 through GHG-5 above.	City of Santee
<b>Hazards and Hazardous Materials</b>			
Use, Transport, Disposal	<b>HAZ-1:</b> Applications for future development in the TCSP area, AEN, and Housing Element sites, wherein the City has determined a potential for impacts to known and unknown hazardous materials sites shall be required to identify potential conditions which require further regulatory oversight and demonstrate compliance consistent with the following prior to issuance of any permits. A. Phase I Environmental Site Assessment (ESA) shall be	Prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>completed in accordance with American Society of Testing and Materials Standards. If hazardous materials are identified requiring remediation, a Phase II ESA and remediation effort shall be conducted in conformance with federal, state, and local regulations.</p> <p>B. If the Phase II ESA identifies the need for remediation, then the following shall occur prior to the issuance of grading permits.</p> <p>1. The applicant shall retain a qualified environmental engineer to develop a soil and/or groundwater management plan to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances (soil, groundwater). The qualified environmental consultant shall monitor excavations and grading activities in accordance with the plan. The plans shall be approved by</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>the City prior to development of the site.</p> <p>2. The applicant shall submit documentation showing that contaminated soil and/or groundwater on proposed development parcels have been avoided or remediated to meet cleanup requirements established by appropriate local regulatory agencies (Regional Water Quality Control Board [RWQCB]/DTSC/DEHQ) based on the future planned land use of the specific area within the boundaries of the site (i.e., commercial, residential), and that the risk to human health of future occupants of these areas therefore has been reduced to below a level of significance.</p> <p>3. The applicant shall obtain written authorization from the appropriate regulatory agency (RWQCB/DTSC/DEHQ) confirming the completion of remediation. A copy of the authorization shall be</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>submitted to the City to confirm that all appropriate remediation has been completed and that the proposed development parcel has been cleaned up to the satisfaction of the regulatory agency. In the situation where previous contamination has occurred on a site that has a previously closed case or on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the DEHQ shall be notified of the proposed land use.</p> <p>4. All cleanup activities shall be performed in accordance with all applicable federal, state, and local laws and regulations, and required permits shall be secured prior to commencement of construction to the satisfaction of the City and compliance with applicable regulatory agencies such as but not limited to the SMC.</p>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Accidental Release	Refer to HAZ-1 above.	Refer to HAZ-1 above.	City of Santee
Emissions Near a School	Refer to HAZ-1 above.	Refer to HAZ-1 above.	City of Santee
<b>Noise</b>			
Noise Standards	<p><b>NOI-1:</b> Noise levels from construction of future projects within the TCSP area shall not exceed 5 dBA above the maximum hourly average daytime baseline ambient noise levels as measured at nearby noise-sensitive land uses. To ensure the reduction of noise levels, a Construction Management Plan describing measures shall be included on future construction plans to ensure compliance with the aforementioned limits. The plans shall be prepared by future project applicants and submitted to the City for approval prior to issuance of a grading permit. The following measures may be included to reduce construction noise:</p> <ul style="list-style-type: none"> <li>• Construction equipment to be properly outfitted and maintained with manufacturer-recommended noise-reduction devices.</li> <li>• Diesel equipment to be operated with closed engine doors and</li> </ul>	Prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.	City of Santee

**Table 4-1**  
**Mitigation Monitoring and Reporting Program**

Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>equipped with factory-recommended mufflers.</p> <ul style="list-style-type: none"> <li>• Mobile or fixed “package” equipment (e.g., arc-welders and air compressors) to be equipped with shrouds and noise control features that are readily available for that type of equipment.</li> <li>• Electrically powered equipment to be used instead of pneumatic or internal combustion powered equipment, where feasible.</li> <li>• Unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes) to be prohibited.</li> <li>• Material stockpiles and mobile equipment staging, parking, and maintenance areas to be located as far as practicable from noise sensitive receptors.</li> <li>• The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.</li> <li>• No project-related public address or music system shall be audible at any adjacent sensitive receptor.</li> </ul>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<ul style="list-style-type: none"> <li>• Temporary sound barriers or sound blankets may be installed between construction operations and adjacent noise-sensitive receptors. If barriers are to be used, the noise barrier should be constructed of a material with an STC 20 rating with no gaps or perforations and remain in place until the conclusion of demolition, grading, and construction activities.</li> <li>• The project applicant shall notify residences within 100 feet of the project's property line in writing within one week of any construction activity such as demolition, concrete sawing, asphalt removal, and/or heavy grading operations. The notification shall describe the activities anticipated, provide dates and hours, and provide contact information with a description of a complaint and response procedure.</li> <li>• The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise</li> </ul>		



Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>complaints. A clear appeal process for the affected resident shall be established prior to construction commencement to allow for resolution of noise problems that cannot be immediately solved by the site supervisor.</p> <ul style="list-style-type: none"> <li>On-site noise measurements may be used to monitor compliance of construction noise levels at nearby noise-sensitive land uses.</li> </ul>		
	<p><b>NOI-2:</b> Noise generated by standard operation of future projects within the TCSP area shall not exceed 60 dBA hourly average or the maximum hourly average ambient level if it already exceeds 60 dBA when measured at nearby noise-sensitive land uses such as residences, schools, daycares, hospitals, or hotels. To ensure that noise levels are reduced to adequate levels, a site-specific noise study may be requested by the City for individual future projects, as deemed necessary by the City's Planning Department. If noise levels are anticipated to exceed this limit, the</p>	<p>Prior to the issuance of any permit for development in the TCSP area, AEN, or Housing Element sites.</p>	<p>City of Santee</p>

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>City shall ensure that appropriate noise-attenuation features are installed by the project applicant to ensure noise levels are reduced.</p> <p><b>NOI-3:</b> When plans for future temporary or permanent performance spaces or entertainment activities are prepared, they shall be analyzed to ensure that noise levels generated by future events are reduced to 60 dBA hourly average or the maximum hourly average ambient level if it already exceeds 60 dBA at nearby noise-sensitive land uses such as residences, schools, daycares, hospitals, or hotels. For each proposed performance area or venue where noise levels could exceed this limit, a noise assessment shall be performed by a qualified noise consultant which analyzes anticipated noise-generating sources. The study shall assess any noise-amplifying equipment, directionality of amplified noise, positioning of bandstands, and potential crowd noise. The analysis shall also consider the anticipated event types. If modeled noise levels exceed the</p>	<p>Prior to the issuance of any permit for development or special activity in the TCSP area and AEN (excluding the Housing Element sites).</p>	<p>City of Santee</p>

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>limits, design considerations shall be provided to ensure noise levels are reduced to 60 dBA or the maximum hourly average ambient noise level if it already exceeds 60 dBA. Noise attenuation features to be considered may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Permanent barriers blocking the line-of-sight between the noise source and sensitive land use;</li> <li>• Relocation of noise-generating equipment or areas where noise-generating activities may occur;</li> <li>• Repositioning of noise-generating equipment facing away from sensitive uses; and</li> <li>• Enclosing event spaces within structures, as feasible.</li> <li>• The results of the study shall be incorporated into design plans and be approved by the City Planning Department.</li> </ul>		
Groundborne Noise and Vibration	<p><b>NOI-4:</b> A site-specific vibration study shall be prepared for proposed land uses that have the potential for construction-related vibration impacts. Construction activities within 200 feet and pile-driving within 600</p>	Prior to the issuance of any permit for development in the TCSP area and AEN (excluding the Housing Element sites).	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	feet of a vibration-sensitive use could be potentially disruptive to vibration-sensitive operations. Proposed development shall implement recommended measures within the study to ensure that projects reduce construction-related vibration impacts to below 0.1 in/sec PPV at vibration-sensitive uses. Measures to reduce noise may include, but are not limited to, placing vibratory rollers in static mode within set distances of vibration-sensitive structures, prohibiting vibratory construction operations during specific hours, and limiting pile driving operations.		
<b>Transportation</b>			
Vehicle Miles Traveled	<b>TRA-1:</b> For development projects located outside of a TPA that both: do not meet other VMT screening criteria and exceed VMT thresholds established by the City, the City shall require implementation of applicable Mobility Element Policies that would support VMT reductions for individual projects. Specifically, the City shall require that future projects be compliant with Mobility Element Policies 9.1 through 9.5, which	Prior to the issuance of any permit for development in the TCSP area, AEN, and Housing Element sites 20A and 20B.	City of Santee

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>encourage the use of Transportation Demand Management (TDM) strategies, such as ride sharing programs, flexible work schedule programs, and incentives for employees to use transit. Additionally, alternative transportation modes, such as walking, cycling and public transit are encouraged to reduce peak hour vehicular trips, save energy, and improve air quality. Sample TDM measures that may be applied at the project-level are provided below:</p> <ul style="list-style-type: none"> <li>• Increase mixed-use development</li> <li>• Increase transit accessibility</li> <li>• Provide pedestrian network improvement along project frontage</li> <li>• Provide bicycle network improvement along project frontage</li> <li>• Provide bicycle parking and bike lockers</li> <li>• Implement subsidized or discounted transit passes</li> <li>• Provide rider-sharing programs</li> <li>• Implement commute trip reduction marketing</li> <li>• Implement school pool program</li> </ul>		

Table 4-1 Mitigation Monitoring and Reporting Program			
Potential Significant Impact	Mitigation Measures	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<ul style="list-style-type: none"> <li>Implement bike-sharing or micro mobility program</li> <li>Provide local shuttle to connect visitors to different attractions throughout the City.</li> </ul> <p>Additional measures can be found in the California Air Pollution Control Officers Association Quantifying Greenhouse Gas Mitigation Measures report (<a href="https://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf">https://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf</a>). Mitigation measures should be consistent with the City's Active Transportation Plan.</p>		
<b>Utilities and Service Systems</b>			
Utility Infrastructure	See BIO-1 through BIO-6; CUL-1 through CUL-4; GEO-1; HAZ-1; and NOI-1, NOI-2, and NOI-4 above.	See BIO-1 through BIO-6; CUL-1 through CUL-4; GEO-1; HAZ-1; and NOI-1, NOI-2, and NOI-4 above.	City of Santee

This page intentionally left blank