DE ANZA NATURAL
AMENDMENT TO THE MISSION BAY PARK MASTER PLAN

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
SCH #2018061024

Prepared for:

City of San Diego
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March 2023

The City of SAN DIEGO

Planning Department
Environmental Policy & Public Spaces
Planning Division

DRAFT
PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH No. 2018061024

SUBJECT: **De Anza Natural Amendment to the Mission Bay Park Master Plan**

Applicant: City of San Diego Planning Department

DRAFT DOCUMENT – March 6, 2023

PROJECT DESCRIPTION:

The City is proposing a De Anza Natural Amendment to the Mission Bay Park Master Plan, which is a comprehensive planning document that provides a policy framework to guide development throughout Mission Bay. The proposed amendment includes recommendations to serve local and regional recreation needs while preserving the natural resources of the De Anza Cove area. The proposed amendment aims to expand the park's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect against the risk of climate change, in line with the Climate Resilient SD plan. The proposed amendment would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations, active and passive recreational opportunities to enhance public use of the area, and improved access to recreational uses. Finally, the proposed amendment recognizes the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area. The amendment seeks to implement the recommendations of the adopted Mission Bay Park Master Plan.

PROJECT LOCATION:

De Anza Cove is located in the northeast corner of Mission Bay Park in the City of San Diego. The project area consists of approximately 314 acres of land and includes approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area is bounded to the east by Mission Bay Drive, the north by Grand Avenue (on the eastern portion of the project area) and Pacific Beach Drive (on the western portion), the west by Crown Point Drive, and the south by Mission Bay. The Rose Creek inlet bisects the project area into eastern and western portions.

The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, Campland on the Bay, Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas.

The project area is located within the Coastal Overlay Zone. Additionally, Multi-Habitat Planning Area lands are located along a portion of Rose Creek within the project area.

ENVIRONMENTAL DETERMINATION:

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the project.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following Draft PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the area of **Historical, Archaeological, and Tribal Cultural Resources.** All other impacts analyzed in this Draft PEIR were found to be less than significant.

This document has been prepared by the City of San Diego's Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

RESULTS OF PUBLIC REVIEW:

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

( ) Comments addressing the accuracy or completeness of the draft environmental document werereceived during the public input period. The letters and responses are incorporated herein.

Rebecca Malone

Rebecca Malone, AICP, Program Manager
Planning Department

March 6, 2023
Date of Draft Report

Date of Final Report

Analyst: Jordan Moore, Planning Department

PUBLIC REVIEW DISTRIBUTION:

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed in the office of the Planning Department or purchased for the cost of reproduction.

Federal Government
U.S. Environmental Protection Agency (19)
U.S. Fish and Wildlife Service (23)
U.S. Army Corps of Engineers (26)

State of California
Caltrans District 11 (31)
California Dept. of Fish & Wildlife (32)
California Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
California Natural Resources Agency (43)
Regional Water Quality Control Board (44)
State Clearinghouse (46)
California Coastal Commission (47)
California Air Resources Board (49)
California Transportation Commission (51)
California Dept of Transportation (51A)
California Boating and Waterways (52)
California State Coastal Conservancy (54)
Water Resources Control Board (55)
Native American Heritage Commission (56)
California Department of Conservation (60)
California State Lands Commission (62)
University of California Natural Reserve System

County of San Diego
County Vector Control (63)
Air Pollution Control District (65)
County of San Diego Department of Planning and Development Services (68)
County Water Authority (73)
Department of Environmental Health – Hazardous Materials Management Division (75)
Department of Environmental Health – Land and Water Division (76)

City of San Diego
Office of the Mayor (91)
Council President Elo-Rivera, District 9
Councilmember LaCava, District 1
Councilmember Campbell, District 2
Councilmember Whitburn, District 3
Council President Pro Tem Montgomery-Steppe, District 4
Councilmember von Wilpert, District 5
Councilmember Lee, District 6
Councilmember Campillo, District 7
Councilmember Moreno, District 8

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Dirk Smith, Senior Planner
Megan Hickey, Project Officer II/Principal Water Resources Specialist

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Carrie Purcell, Deputy Director
James Arnhart, Project Officer II
Nicholas Ferracone, Senior Planner

Library Department
Library Department-Gov. Documents (81)
Central Library (81A)

Balboa Branch Library (81B)
Clairemont Branch Library (81H)
Linda Vista Branch Library (81M)
North Clairemont Branch Library (81S)
Ocean Beach Branch Library (81V)
Pacific Beach/Taylor Branch Library (81X)
Point Loma/Hervey Branch Library (81Z)

City Advisory Boards and Commissions
Park and Recreation Board (83)
Historical Resources Board (87)
Wetlands Advisory Board (91A)
Park Development (93)
Mission Bay Park Committee (318A)

Other Governments
City of Chula Vista (94)
City of Coronado (95)
City of Del Mar (96)
City of El Cajon (97)
City of Escondido (98)
City of Imperial Beach (99)
City of La Mesa (100)
City of Lemon Grove (101)
City of National City (102)
City of Poway (103)
City of Santee (104)
City of Solana Beach (105)
San Diego Association of Governments (108)
San Diego Unified Port District (109)
San Diego County Regional Airport Authority (110)
Metropolitan Transit System (112)
San Diego Gas & Electric (114)

School Districts
San Diego Unified School District (132)

Community Planning Groups
Community Planning Committee (194)
Clairemont Community Planning Group (248)
Linda Vista Planning Group (267)
Mission Valley Planning Group (331)
Midway-Pacific Highway Community Planning Group (308)
Mission Beach Precise Planning Board (325)
Ocean Beach Planning Board (367)
Pacific Beach Planning Group (375)
Peninsula Community Planning Board (390)

Town and Community Councils
Town Council Presidents Association (197)

Native American
Native American Heritage Commission (222)
Kuumeyaay Cultural Heritage Preservation (223)
Kuumeyaay Cultural Repatriation Committee (225)
Barona Group of Capitan Grande Band of Mission Indians (225A)
Campo Band of Mission Indians (225B)
Ewiiaapaayp Band of Mission Indians (225C)
Inaja Band of Mission Indians (225D)
Jamul Indian Village (225E)
La Posta Band of Mission Indians (225F)
Manzanita Band of Mission Indians (225G)
Sycuan Band of Mission Indians (225H)
Viejas Group of Capitan Grande Band of Mission Indians (225I)
Mesa Grande Band of Mission Indians (225J)
San Pasqual Band of Mission Indians (225K)
Ipai Nation of Santa Ysabel (225L)
La Jolla Band of Mission Indians (225M)
Pala Band of Mission Indians (225N)
Pauma Band of Mission Indians (225O)
Pechanga Band of Mission Indians (225P)
Rincon Band of Luiseno Indians (225Q)
San Luis Rey Band of Luiseno Indians (225R)
Los Coyotes Band of Mission Indians (225S)

Other Interested Agencies, Organizations and Individuals
University of California San Diego Library – Government Document Unit (134)
UCSD Physical & Community Planning (277)
Daily Transcript (135)
San Diego Chamber of Commerce (157)
The San Diego River Park Foundation (163)
San Diego River Coalition (164)
Sierra Club San Diego Chapter (165)
Neighborhood Canyon Creek and Park Groups (165A)
San Diego Canyonlands (165A)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
Jim Peugh (167A)
San Diego River Conservancy (168)
Environmental Health Coalition (169)
California Native Plant Society, San Diego Chapter (170)
San Diego Coastkeeper, Matt O'Malley (173)
Citizens Coordinate for Century 3 (179)
Endangered Habitat League (182)
San Diego Tracking Team (187)
League of Women Voters (192)
Community Planners Committee (194)
Carmen Lucas (206)
South Coastal Information Center (210)
San Diego Historical Society (211)
San Diego Archaeological Center (212)
Save Our Heritage Organization (214)

Ron Chrisman (215)
Clint Linton (215B)
Frank Brown - Inter-Tribal Cultural Resource Council (216)
Campo Band of Mission Indians (217)
San Diego County Archaeological Society Inc. (218)
Surfers Tired of Pollution (318)
Friends of Rose Canyon (320)
Pat Gallagher (322A)
Mission Bay Lessees (323)
Beautiful Pacific Beach
Discover Pacific Beach
Mission Bay Gateway Project
Campland on the Bay
Friends of Campland
Community Health Improvement Partners
Equinox Center
The San Diego Foundation
Friend of Mission Bay Marshes
Rose Creek Watershed Alliance
Surfrider Foundation – San Diego Chapter
Mission Bay Golf Course
Municipal Golf Association
Mission Bay Aquatic Center
Mission Bay Rowing Association
Mission Bay Yacht Club
Pacific Beach Tennis Club
ReWild Mission Bay
Fiesta Island Dog Owners Association (FIDO)
San Diego County Democrats for Environmental Action
Sustainability Matters
Handa Ornithology Lab
Environmental Center of San Diego
Other Interested Parties

Table of Contents

Tables

Figures

Appendices

Acronyms and Abbreviations

µg/m^3	micrograms per cubic meter
°C	degrees Celsius
°F	degrees Fahrenheit
2021 Regional Plan	San Diego Forward: The Regional Plan
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
AERMOD	American Meteorological Society/Environmental Protection Agency Regulatory Model
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
amsl	above mean sea level
APE	area of potential effect
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
ASMD	Area-Specific Management Directive
BASASP	Balboa Avenue Station Area Specific Plan
BMP	best management practice
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standard Code
Caltrans	California Department of Transportation
Campland	Campland on the Bay
CAP	Climate Action Plan
CARB	California Air Resources Board
CCA	California Coastal Act
CCC	California Coastal Commission
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations

CH_4	methane
City	City of San Diego
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Commission	California State Lands Commission
Complete Communities Program	Complete Communities: Housing Solutions and Mobility Choices
County	County of San Diego
COZ	Coastal Overlay Zone
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DEHQ/HMD	County of San Diego Department of Environmental Health and Quality Hazardous Materials Division
DOC	California Department of Conservation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EO	Executive Order
ESA	Environmental Site Assessment
ESL	Environmentally Sensitive Lands
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FRA	Federal Responsibility Area
GDP	General Development Plan
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
HA	hydrologic area
HAP	hazardous air pollutant
HARP 2	Hotspots Analysis and Reporting Program Version 2
HMD	San Diego County Hazardous Materials Division
HOV	high occupancy vehicle
HU	hydrologic unit
IPCC	Intergovernmental Panel on Climate Change
KFMR/NWP	Kendall-Frost Marsh Reserve/Northern Wildlife Preserve
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LDC	Land Development Code
LDM	Land Development Manual

L_{eq}	equivalent continuous sound level (time-averaged sound level)
$L_{eq\ 12\text{-}hr}$	12-hour A-weighted equivalent sound level
$L_{eq\ 1\text{-}hr}$	1-hour A-weighted equivalent sound level
$L_{eq}(h)$	A-weighted equivalent sound level
LID	Low Impact Development
L_{max}	maximum sound level during the measurement interval
LOSSAN	Los Angeles–San Diego–San Luis Obispo
LRA	Local Responsibility Area
LUAG	Land Use Adjacency Guidelines
MBPMP	Mission Bay Park Master Plan
MBTA	Migratory Bird Treaty Act
MBTAG	Mission Bay Tennis Center, Athletic Fields, and Golf Course
MCAS	Marine Corps Air Station
MEIR	maximally exposed individual resident
mg/m^3	milligrams per cubic meter
MHPA	Multi-Habitat Planning Area
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMT	million metric tons
Mobility Choices Program	Complete Communities: Mobility Choices
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric tons
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	California Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NF_3	nitrogen trifluoride
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO_x	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NRMP	Natural Resource Management Plan
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
Ozone Plan	Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
Pacific Beach CP/LCP	Pacific Beach Community Plan and Local Coastal Program Land Use Plan
PCB	polychlorinated biphenyl
PEIR	Program Environmental Impact Report
PM_{10}	particulate matter less than 10 microns
$PM_{2.5}$	particulate matter less than 2.5 microns
Porter-Cologne Act	Porter-Cologne Water Quality Control Act

ppb	parts per billion
ppm	parts per million by volume
PPV	peak particle velocity
RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
Regional Bike Plan	Riding to 2050: San Diego Regional Bike Plan
REL	reference exposure level
Reporting Rule	Final Mandatory Greenhouse Gas Reporting Rule
ReWild Feasibility Study	ReWild Mission Bay: Wetlands Restoration Feasibility Study Report
RMP	Risk Management Plan
RPS	Renewable Portfolio Standard
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB or basin	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDBG	San Diego Biological Guidelines
SDIA	San Diego International Airport
SEL	sound exposure level
SEP	Supplemental Environment Project
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_x	sulfur
SRA	State Responsibility Area
SSA	Special Study Area
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Stormwater Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TCR	Tribal Cultural Resource
UC San Diego	University of California, San Diego
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibel
VMT	vehicle miles traveled
VOC	volatile organic compound

S

Executive Summary

S.1 Proposed Project

S.1.1 Project Location and Setting

The project area is located in the northeast corner of Mission Bay Park in the City of San Diego (City). The project area consists of approximately 314 acres of land and includes approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area is bounded to the east by Mission Bay Drive, the north by Grand Avenue (on the eastern portion of the project area) and Pacific Beach Drive (on the western portion), the west by Crown Point Drive, and the south by Mission Bay. The Rose Creek inlet bisects the project area into eastern and western portions.

The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas.

The project area is located within the Coastal Overlay Zone (COZ). Additionally, Multi-Habitat Planning Area (MHPA) lands are located along a portion of Rose Creek within the project area.

S.1.2 Project Description

The project analyzed in this Program Environmental Impact Report (PEIR) is an amendment to the Mission Bay Park Master Plan (MBPMP), which is a comprehensive planning document that provides a policy framework to guide development throughout Mission Bay. The project includes recommendations pertaining to the project area to serve local and regional recreation needs while preserving the natural resources of the De Anza Cove area. The project aims to expand the park's natural habitat and improve water quality through the creation of additional wetlands while providing nature-based solutions to protect against the risk of climate change in line with the Climate Resilient SD Plan (City of San Diego 2021a). The project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational opportunities to enhance public use

of the area, and improved access to recreational uses. Finally, the project would recognize the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area. The project seeks to implement the recommendations of the adopted MBPMP. Refer to Chapter 3.0, Project Description, for further details regarding the components of the project.

S.2 Project Objectives

In accordance with California Environmental Quality Act (CEQA) Guidelines, Section 15124(b), the following are the basic objectives of the project:

1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.

S.3 Areas of Controversy

The Notice of Preparation (NOP) was distributed on January 11, 2022, for a 30-day public review and comment period, and a public scoping meeting was held on January 24, 2022. There were several areas of controversy that were raised during the NOP scoping period, including the size and location of the proposed wetlands that would be enhanced and restored, the size and location of active recreation facilities, and the size and location of low-cost visitor guest accommodations that would be included in the project area. The NOP and comment letters received during the 30-day public review and comment period are included in Appendix A, Notice of Preparation and Scoping Comments.

Through the scoping activities, the proposed project was determined to have the potential to result in significant environmental impacts to the following issue areas: Land Use; Air Quality and Odor; Biological Resources; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Historical, Archaeological, and Tribal Cultural Resources; Hydrology and Water Quality; Noise; Paleontological Resources; and Transportation and Circulation. As discussed in this PEIR, environmental impacts that were determined to be significant and unavoidable that may generate controversy have been identified in the issue area of Historical, Archaeological, and Tribal Cultural Resources. Table S-4, Summary of Significant Environmental Impacts, lists significant and unavoidable impacts, summarizes the results of the impact analysis, and lists applicable mitigation measures.

S.4 Project Alternatives

Project alternatives are assessed in further detail in Chapter 8.0, Alternatives.

S.4.1 No Project/No Build Alternative

Under the No Project/No Build Alternative, an amendment to the MBPMP would not occur. The Mission Bay Tennis Center, Athletic Fields, and Golf Course, Campland, and KFMR/NWP would remain the same as the existing condition. The Mission Bay RV Resort would continue to operate as currently leased. The rest of the De Anza Cove area would remain a "Special Study Area" as currently designated in the MBPMP for active recreation, passive recreation, and regional recreation land uses.

S.4.2 Wetlands Optimized Alternative

The analysis of the Wetlands Optimized Alternative is provided at an equal level of detail with the proposed project in accordance with the City's awarded Supplemental Environment Project (SEP) grant. The SEP grant was awarded by the San Diego Regional Water Quality Control Board (RWQCB) in 2021 and promotes the restoration of aquatic ecosystems in accordance with Tentative Resolution No. R9-2015-0041 to further recovery of streams, wetlands, and riparian systems in accordance with the RWQCB's Practical Vision. This SEP funded this alternative's preparation and the additional environmental review and consideration of the Wetlands Optimized Alternative.

The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in Northeastern Mission Bay, converting the southern portion of the De Anza "boot" and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouses, uplands, multi-use paths, wetlands, and an Interpretive Nature Center (see Figure 8-2, Impacts to Biological Resources – Wetlands Optimized Alternative).

The Wetlands Optimized Alternative identifies ways to balance providing public recreation and the sustainable management of environmental resources. Similar to the proposed project, the Wetlands Optimized Alternative would include a combination of habitat restoration, active recreation, low-cost visitor guest accommodations, open beach, and regional parkland and would modify the open water portions of De Anza Cove. Table S-1, Comparison of Wetlands Optimized Alternative to the Proposed Project, compares the land uses and acreages of this alternative to the proposed project.

The Wetlands Optimized Alternative would include enhancement and restoration within the existing KFMR/NWP, expansion of wetlands currently occupied by Campland, and expanded marshland and habitat in the Rose Creek and De Anza Cove areas. This alternative would provide approximately 250.9 acres of expanded marshland habitat that includes approximately 31.1 acres at the former Campland and approximately 133 acres of other new wetlands. The expanded marshland/habitat area would be composed of high-, mid-, and low-salt marsh areas, mudflats, and subtidal areas, creating a natural interface with De Anza Cove and enhancing water quality in the bay.

In addition, the Wetlands Optimized Alternative would increase upland habitat and buffer areas to approximately 46.1 acres compared to approximately 37.4 acres under the proposed project. Similar to the proposed project, the upland habitat and buffer areas would accommodate a multi-use path with educational signage and mounded landforms featuring native coastal sage, dune, and other native plants. Within this area, passive recreation amenities such as overlooks, pathways, picnic areas, and interpretive signs could be accommodated. The upland plantings would serve as a buffer to the wetland habitat.

Similar to the proposed project, the Wetlands Optimized Alternative would incorporate a range of recreational uses, with compatible user groups that would share the lighted sports fields. Many existing recreational opportunities would be retained. Similar to the proposed project, the current site of the Mission Bay Boat and Ski Club would be replaced with a widened Rose Creek inlet, wetlands, and buffers adjacent to the creek. However, overall, the Wetlands Optimized Alternative would reduce the amount of active recreational activities to approximately 49.9 acres compared to approximately 60.1 acres under the proposed project.

The Wetlands Optimized Alternative would increase regional parkland to approximately 30.8 acres. The increased regional parkland would provide additional areas to support activities such as picnicking, kite flying, Frisbee games, informal sports, walking, jogging, kids' play, bicycling, and skating compared to the proposed project. However, only approximately 2.3 acres of sandy beach would be provided at the northern edges of De Anza Cove adjacent to the low-cost visitor guest accommodation and boating uses. Similarly, the Wetlands Optimized Alternative would provide access to multi-use paths, which would allow for pedestrians and cyclists to connect with points west, north, and east. The multi-use path would allow users to view the marshes and have distant views of Mission Bay.

Finally, the Wetlands Optimized Alternative would allocate approximately 27.4 acres of low-cost visitor guest accommodations on the eastern side of Rose Creek, buffered by upland vegetation, for RVs, cabins, or other eco-friendly accommodations and associated open space and facilities consistent with camping accommodations. The De Anza "boot" would be fully restored with expanded marshland, wetland, and upland habitat.

Surface parking areas would be provided similar to the proposed project. Parking would be located in conjunction with the athletic areas and within the footprint of the low-cost visitor guest accommodation area. Additionally, surface parking lots accessible from North Mission Bay Drive would be provided to serve the proposed leases, athletic areas, and the regional parkland areas at De Anza Cove. Parking lots associated with the athletics/aquatics area would be accessible from both North Mission Bay Drive and Grand Avenue.

Similar to the proposed project, vehicular access to the project area would be provided from Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodation, regional parkland, boating, and active recreation. Watercraft access would be provided at the eastern end of De Anza Cove at the proposed boat rental facility. The existing boat ramp at the western end of De Anza Cove would be removed.

Similar to the proposed project, the Wetlands Optimized Alternative is a plan amendment to the MBPMP and proposes no specific development. General Development Plans would be developed over time and provide precise engineering and construction plans for the recreational elements of this alternative.

Under the Wetlands Optimized Alternative, proposed habitat area improvements would convert the existing Campland property to natural habitat area, as anticipated in the MBPMP. This would involve the demolition of the developed area within Campland, including structures, pavement and utilities, and demolition of the adjacent boat docks to the south. It would also involve the backfill of portions of the bay located south of the proposed marsh and southwest of the proposed low-cost visitor guest accommodation area. The De Anza "boot" would also be fully restored, including the demolition of the existing developed areas. Cut and fill would be balanced on site.

Table S-1. Comparison of Wetlands Optimized Alternative to the Proposed Project

Land Use	Wetlands Optimized Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	164.1[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	46.1	37.4
Low-Cost Visitor Guest Accommodations	27.4	48.5
Regional Parkland	30.8	26.3
Boat Facilities/Clubhouse	2.9	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	1.2	2.1
Active Recreation	49.9	60.1
Open Water	93	95.9
Open Beach	2.3	5.5
Road[4]	1.9	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes 31.1 acres currently occupied by Campland and 133 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future General Development Plan.

[3] Potential water lease areas on the plan are diagrammatic. The intent is not to overlap with open beach.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, and active recreation, subject to future design.

S.4.3 Enhanced Wetlands/Optimized Parkland Alternative

Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would include a combination of habitat restoration, active recreation, low-cost visitor guest accommodations, open beach and regional parkland and would modify the open water portions of De Anza Cove. Table S-2, Comparison of Enhanced Wetlands/Optimized Parkland Alternative to the Proposed Project, compares the land uses and acreages of the alternative to the proposed project. As shown on Figure 8-4, Enhanced Wetlands/Optimized Parkland Alternative, the alternative includes additional wetland enhancement opportunities but would reduce upland habitat compared to the proposed project. This alternative would provide 243.3 acres of marshland habitat that includes 35.5 acres at the former Campland, 86.8 acres at KFMR, and 121 acres of other new wetlands. This alternative would provide 29.2 acres of upland habitat and buffer. In addition, the Enhanced Wetlands/Optimized Parkland Alternative would reduce the amount of active recreational activities to 52.6 acres and the low-cost visitor guest accommodations to 40 acres, compared to the proposed project. The Enhanced Wetlands/Optimized Parkland Alternative would seek to retain potentially historic structures over 45 years old, such as the administration

buildings for De Anza Cove mobile home park and/or the Mission Bay RV Resort, for reuse in the low-cost visitor guest accommodation area. This alternative would also retain the Mission Bay Golf Course Practice Center and Clubhouse for reuse within the active and regional parkland areas. Finally, the Enhanced Wetlands/Optimized Parkland Alternative would change the development configuration and reduce the open water areas of De Anza Cove compared to the proposed project.

Table S-2. Comparison of Enhanced Wetlands/Optimized Parkland Alternative to the Proposed Project

Land Use	Enhanced Wetlands/Optimized Parkland Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	156.5[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	29.2	37.4
Low-Cost Visitor Guest Accommodations	40	48.5
Regional Parkland	40	26.3
Boat Facilities/Clubhouse	2.3	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	0.7	2.1
Active Recreation	52.6	60.1
Open Water	91.2	95.9
Open Beach	4.3	5.5
Road[4]	2.3	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes 35.5 acres currently occupied by Campland and 121 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future General Development Plan.

[3] Boat lease areas overlap with other land uses; therefore, acreages are not included in the total.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, and active recreation, subject to future design.

S.4.4 Resiliency Optimized Alternative

Similar to the proposed project, the Resiliency Optimized Alternative would include a combination of habitat restoration, active recreation, low-cost visitor guest accommodations, open beach and regional parkland and would modify the open water portions of De Anza Cove. Table S-3, Comparison of Resiliency Optimized Alternative to the Proposed Project, compares the land uses and acreages of the alternative to the proposed project. As shown on Figure 8-5, Resiliency Optimized Alternative, the alternative includes additional wetlands enhancement and upland habitat opportunities compared to the proposed project. The additional habitat areas would include transitional zones into higher elevation habitats and provide resiliency to changes in freshwater flows from altered stormwater regimes. Marshes also act as buffers to sea level rise and reduce coastal erosion and flooding.

This alternative would provide 235.3 acres of expanded marshland habitat that includes 31.4 acres at the former Campland, 86.8 at KFMR/NWP, and 117.1 acres of other new wetlands. The alternative also includes an increase in upland habitat and buffers compared to the proposed project. The Resiliency Optimized Alternative would further reduce the amount of active recreational activities to 49.9 acres

and reduce low-cost visitor guest accommodations to 45.3 acres. These areas would be replaced with additional regional parkland opportunities for a total of 32.3 acres. In addition, the Resiliency Optimized Alternative reduces the overall acreage of the open water portions of De Anza Cove to 95.2 acres.

Table S-3. Comparison of Resiliency Optimized Alternative to the Proposed Project

Land Use	Resiliency Optimized Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	148.5[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	38.8	37.4
Low-Cost Visitor Guest Accommodations	45.3	48.5
Regional Parkland	32.3	26.3
Boat Facilities/Clubhouse	3.1	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	1.2	2.1
Active Recreation	49.9	60.1
Open Water	95.2	95.9
Open Beach	3.4	5.5
Road[4]	1.8	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

1 Expanded wetlands includes 31.4 acres currently occupied by Campland and 117.1 acres of other new wetlands.

2 Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future General Development Plan.

3 Boat lease areas overlap with other land uses; therefore, acreages are not included in the total.

4 Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, and active recreation, subject to future design.

S.4.5 Environmentally Superior Alternative

The level of environmental impacts associated with the No Project/No Build Alternative is less than the proposed project, as this alternative would avoid ground disturbance that could result in impacts to subsurface archaeological resources or Tribal Cultural Resources (TCRs), and would reduce the project's significant and unavoidable impacts on historical, archaeological, and TCRs. Therefore, the No Project/No Build Alternative would be considered the environmentally superior alternative. According to Section 15126.6 of the CEQA Guidelines, if the No Project Alternative (No Project/No Build Alternative) is selected as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the project's goals and objectives, the Enhanced Wetlands/Optimized Parkland Alternative is the environmentally superior alternative for this PEIR.

As discussed above, the No Project/No Build Alternative does not fully meet any of the six project objectives, the Wetlands Optimized Alternative only meets three of the six project objectives, and the Resiliency Optimized and Enhanced Wetlands/Optimized Parkland Alternatives fully meet four of the six project objectives (project objectives 2, 3, 4, and 6). While the Resiliency Optimized Alternative would result in reduced impacts to only four issue areas, the Enhanced Wetlands/Optimized Parkland

Alternative would result in reduced impacts to five issue areas: Air Quality and Odor; Greenhouse Gas (GHG) Emissions; Historical, Archaeological, and TCRs; Hydrology and Water Quality; and Noise. All other impacts would remain similar to the proposed project.

Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in the greatest reduction in environmental impacts compared to the proposed project and would be considered the environmentally superior alternative.

S.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact

Table S-4, Summary of Significant Environmental Impacts, summarizes the conclusions of the environmental analysis in this PEIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after implementation of the mitigation measures is also presented.

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
Land Use			
Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?	Implementation of the project would not conflict with the environmental goals, objectives, or guidelines of the City's General Plan or other applicable land use plan or regulation, including the MBPMP, Land Development Code, 2021 Regional Plan, CAP, Climate Resilient SD Plan, California Coastal Act, Mission Bay Natural Resources Plan, Pacific Beach Community Plan and Local Coastal Plan, or Balboa Avenue Station Area Specific Plan and, as a result, cause an indirect or secondary environmental impact. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?	Implementation of the project would not lead to the development or conversion of General Plan or Community Plan designated Open Space or Prime Farmland to a more intensive land use, resulting in a physical division of the community. No impact would occur.	No mitigation measures required.	No Impact
Would the proposed project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?	Implementation of the project would not conflict with the provisions of the City's MSCP Subarea Plan or other approved local, regional, or state Habitat Conservation Plan. Impacts would be potentially significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	The project is not located in an airport influence area, and implementation of the project would not result in land uses that are not compatible with an adopted ALUCP. No impact would occur.	No mitigation measures required.	No Impact
Air Quality and Odor			
Would the proposed project conflict with or obstruct the implementation of the applicable air quality plan?	The project's land uses and associated vehicle trips have been anticipated in local air quality plans. Therefore, the project would be consistent at a regional level with the underlying growth forecasts in the Regional Air Quality Strategy. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	The project daily construction and operation emissions would not exceed the San Diego County Air Pollution Control District significance thresholds as defined in Section 5.2, Air Quality and Odor. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants (TACs)?	The project would not create a carbon monoxide hotspot during construction or operation. TAC emissions during construction would not result in exposure of sensitive receptors to substantial pollutant concentrations that would exceed the San Diego County Air Pollution Control District significance thresholds. Therefore, impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project create objectionable odors affecting a substantial number of people?	The project does not include land uses associated with generation of adverse odors. Further, the San Diego County Air Pollution Control District prohibits the emission of any material that causes a nuisance to a considerable number of persons, or endangers the comfort, health, or safety of the public. Therefore, impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Biological Resources			
Would the proposed project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP Subarea Plan (SAP)or other local or regional plans, policies or regulations, or by CDFW or USFWS?	Implementation of the project has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by constructing development adjacent to sensitive habitat. Potential impacts to federally or state-listed species (including raptors), MSCP covered species, migratory bird species, narrow endemic species, and plant species with a California Rare Plant Rank of 2 or higher. Impacts would be potentially significant.	**MM BIO 5.3-1 Focused Sensitive Plant Species Surveys.** Prior to subsequent project-level approval and prior to any construction or grading activities, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat in order to determine presence/absence of sensitive plant species previously observed or with high potential to occur within the proposed project area, including California seablite, Palmer's frankenia, and estuary seablite. For these species, focused surveys shall be conducted during their specific blooming periods	Less Than Significant

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		to determine presence/absence. If sensitive species are mapped within any proposed construction, access, or staging areas, these areas shall be modified to avoid direct impacts to mapped sensitive plant species. If significant impacts to these species are unavoidable, the take of these species shall be reduced to a less than significant level through implementation of one or a combination of the following actions, in accordance with a City of San Diego approved Conceptual Restoration Plan or acquisition of mitigation credits: • Impacted plants shall be salvaged and relocated to suitable habitat in the on-site restoration area in Kendall-Frost Marsh Reserve/Northern Wildlife Preserve within the Multi-Habitat Planning Area boundary, if possible. If relocation to this site is not practical, the plants shall be relocated off-site to an appropriate (nearby) location determined by a qualified biologist. • Seeds from impacted plants shall be collected for use at a local off-site location. • Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site. • Comparable habitat at an approved off-site location shall be determined by a qualified biologist and preserved for relocation, enhancement, or transplant of the impacted sensitive plants. Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all of the following: • Conceptual planting plan prepared by a qualified biologist including grading and, if appropriate, temporary irrigation • Planting specifications and fencing and signage to discourage unauthorized access of the planting site • Monitoring program including success criteria • Long-term maintenance and preservation plan **MM BIO 5.3-2 Qualified Monitoring Biologist.** Prior to subsequent project-level approval and prior to the start of construction activities, the project biologist shall submit a letter to City of San Diego Planning Department and City of San Diego Development Services Department Mitigation Monitoring Coordination that confirms a qualified monitoring biologist, as defined in the City of San Diego's Municipal Code, Biology Guidelines, has been retained to implement required monitoring. This letter will also include the names and resumes of all people involved in the biological monitoring of the proposed project, a schedule for the proposed work, and the facility's pre-approved Facility Maintenance Plan. The qualified monitoring biologist shall be responsible for the following monitoring and reporting tasks: a. **Documentation.** Prior to the issuance of any construction or grading plans in any proposed project area within, or immediately adjacent to, a Multi-Habitat Planning Area,	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		the qualified monitoring biologist shall verify and submit proof to Mitigation Monitoring Coordination that all Multi-Habitat Planning Area boundaries and limits of work have been delineated on all maintenance documents. b. **Biological Construction Mitigation/Monitoring Exhibit.** Prior to the start of construction within the future site-specific proposed project area, the qualified monitoring biologist shall submit a Biological Construction Mitigation/Monitoring Exhibit, which includes limits of work, proposed monitoring schedule, avian, focused sensitive species, or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service protocol), timing of surveys, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, species-specific Multiple Species Conservation Program Subarea Plan Area-Specific Management Directives, and any subsequent requirements determined by the qualified monitoring biologist and the Mitigation Monitoring Coordination. The Biological Construction Mitigation/Monitoring Exhibit shall include the construction site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule for construction activities. Where the potential for impacts to biological resources is limited (e.g., construction within a footprint that consists entirely of previously developed or disturbed lands), the Biological Construction Mitigation/Monitoring Exhibit may be limited to a pre- and post-maintenance verification inspection. For highly sensitive resource areas, full-time biological monitors may be required. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by Mitigation Monitoring Coordination prior to the start of construction. c. **Avian Protection.** In order to prevent impacts to California least tern and other sensitive nesting shorebirds, the qualified monitoring biologist and Mitigation Monitoring Coordination shall ensure that no clearing, grubbing or grading or active wetland creation/restoration shall take place within or adjacent to the Multi-Habitat Planning Area, California least tern preserves, and coastal salt marsh habitats during the City of San Diego's general avian breeding season of February 1 to September 15. Activities must comply with the City of San Diego's Biology Guidelines, Multiple Species Conservation Program Subarea Plan, Land Use Adjacency Guidelines, and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers). Additionally, the following requirements from the Mission Bay Park Natural Resource Management Plan and Mission Bay Park Master Plan for the California least tern shall be met:	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		• In-water construction or dredging shall not be permitted in Mission Bay from April 1 through September 15, unless otherwise approved in writing by the City of San Diego, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service. Any exception would have to meet the following criteria to preserve least tern nesting and foraging: use of silt curtains or similar devices around in-water construction activity, use of noise reduction or low noise equipment, and use of timing and location restrictions on activity to avoid interfering with breeding sites or major least tern foraging areas. • Direct impacts to permanently designated least tern nesting sites shall not be permitted. • The 150-foot buffer zone for each least tern nesting site shall be free of structures with heights over 6 feet, including fencing, to avoid providing raptors perches from which to prey on least tern chicks. • Any existing noise attenuation berms to prevent any significant noise from reaching the Multi-Habitat Planning Area and least tern preserve shall remain in accordance with the Mission Bay Park Natural Resource Management Plan and Mission Bay Park Master Plan. • If construction or wetland creation/restoration construction activities take place during the California least tern breeding season, significant impacts may occur to least tern in the Multi-Habitat Planning Area. To avoid significant noise impacts to breeding least terns, construction within 500 feet of least tern preserves shall take place outside the least tern breeding season, which ranges from April 1 to September 15. d. **Resource Marking/Protection.** Prior to the start of construction activities within the future site-specific proposed project area, the qualified monitoring biologist shall supervise the placement of orange construction fencing or similar visible marker, staking, or flagging along the limits of the construction area adjacent to sensitive biological habitats, as shown on the Biological Construction Mitigation/Monitoring Exhibit to ensure crews remain within the approved construction limits. These demarcations shall not be required for areas with existing barriers, such as chain-link fencing, along the limits or facilities that are within and/or adjacent to developed and non-sensitive habitat areas. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, sensitive plant and wildlife species, including nesting birds and raptors) prior to construction.	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		e. **Cover Trenches.** The qualified monitoring biologist shall oversee the construction site so that cover and/or escape routes for wildlife from excavated areas shall be provided daily. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified monitoring biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified monitoring biologist shall verify that the contractor has covered all steep-walled trenches or excavations prior to the end of construction daily. If wildlife species are encountered within any trenches or excavated areas, the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allowed to disperse. In addition, the qualified monitoring biologist shall provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife (see MM 5.3-2f). f. **Structure Clearance.** Prior to the issuance of any permit to allow for the removal or demolition of trees and existing structures within the project area (particularly the ornamental trees and existing buildings in Campland on the Bay, De Anza Cove, and the Mission Bay Tennis Center, Athletic Fields, and Golf Course), the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allowed the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required. g. **Pre-Construction Meeting/Education.** Prior to the start of any construction activity where the site plan for the construction area indicates that significant impacts to biological resources may occur, a pre-construction meeting shall be held on site with the following in attendance: City of San Diego's project manager, Mitigation Monitoring Coordination representative, the	

Table S-4. Summary of Significant Environmental Impacts

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		construction contractor (if applicable), and the qualified monitoring biologist. At this meeting, the qualified monitoring biologist shall identify and discuss the construction protocols that apply to the proposed activities and the sensitive nature of the adjacent habitat with appropriate project personnel. At the pre-construction meeting, the qualified monitoring biologist shall submit to the Mitigation Monitoring Coordination and construction contractor a copy of the Biological Construction Mitigation/Monitoring Exhibit that identifies areas to be protected, fenced, and monitored. This data shall include all buffer limits, if applicable. Prior to the start of construction activities, the qualified monitoring biologist shall meet with the construction contractor and crew and conduct an on-site educational session regarding the need to avoid impacts outside the approved construction footprint and to protect sensitive plants and wildlife that may occur at the specific facility. This may include but not be limited to explanations of the avian and wetland buffers, the flag system for removal of invasive species or retention of sensitive plants, and clarification of acceptable access routes/methods and staging areas. h. **Biological Monitoring and Reporting.** The qualified monitoring biologist shall inspect/monitor the proposed project construction area in accordance with the approved Biological Construction Mitigation/Monitoring Exhibit. This may be limited to pre- and post-maintenance inspections, weekly visits, or full-time monitoring, as determined by the qualified monitoring biologist and Mitigation Monitoring Coordination. The qualified monitoring biologist shall document monitoring events via a Consultant Site Visit Record. This record shall be sent to the project manager each month, and the project manager shall forward copies to Mitigation Monitoring Coordination. However, if weekly reports are submitted as part of a separate agency permit requirement, these reports may be forwarded to Mitigation Monitoring Coordination in place of Consultant Site Visit Record submittals. If no deviations from the construction site plan occur during maintenance, no additional documentation is required. However, if deviations from the site plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a Final Monitoring Report shall be prepared within 3 months following the completion of mitigation monitoring detailing maintenance and monitoring that occurred and any remedial or compensatory measures taken. **MM BIO 5.3-3 Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Impacts Mitigation.** Any	

Table S-4. Summary of Significant Environmental Impacts

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation

direct impacts to sensitive vegetation communities or jurisdictional aquatic resources would require mitigation to comply with City of San Diego, state and/or federal authorizations, in accordance with the City of San Diego's ratios described in the following table (Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Proposed Project), as well as the ratios defined in any state and/or federal permit(s) issued for the project.

Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Proposed Project

General Vegetation Type (Holland/Oberbauer Code)	SDBG Vegetation Community	Jurisdiction	Project Component where Resource is Present	SDBG Required Mitigation Ratio (in COZ)
Disturbed Freshwater Marsh (52410)	Freshwater Marsh	U/R/C/CC	MBTAG	4:1
Southern Coastal Salt Marsh (52120)	Salt Marsh	U/R/C/CC	KFMR/NWP	4:1
Open Water (64100)	Natural Flood Channel/Marine Habitat	U/R/C/CC	Expanded Marshland Habitat, De Anza Cove area	2:1
Eelgrass beds (64122)	Eelgrass beds[1]	U/R/C/CC	Expanded Marshland Habitat, De Anza Cove area	2:1
Tidal Channel (64112)	Marine Habitat	U/R/C/CC	KFMR/NWP	2:1
Salt Panne (64300)	Salt Panne	U/R/C/CC	KFMR/NWP	4:1
Mudflat (64300)	Marine Habitat	U/R/C/CC	KFMR/NWP	2:1
Disturbed Wetland (Arundo) (11200)	Disturbed Wetland	U A/R/C/CC	MBTAG	2:1

Notes: C = CDFW Jurisdictional; CC = CCC Jurisdictional; COZ = Coastal Overlay Zone; KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve; MBTAG = Mission Bay Tennis Center, Athletic Fields, and Golf Course; R = RWQCB Jurisdictional; SDBG = San Diego Biological Guidelines; U = USACE Jurisdictional

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		[1] At least 1:1 creation mitigation for impacts to eelgrass must occur within Mission Bay (the remaining 1:1 mitigation may occur outside Mission Bay, if necessary). 1. Potential direct impacts to sensitive vegetation communities, including jurisdictional aquatic resources, resulting from project implementation shall be mitigated through one of the following three options: a. Project compensatory mitigation for proposed impacts to sensitive vegetation communities, including jurisdictional aquatic resources, shall be provided through in-kind and on-site creation, enhancement, and/or restoration. b. Compensatory mitigation requirements that are not able to be satisfied through on-site creation, enhancement, and/or restoration shall be satisfied through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the Peñasquitos Watershed or by acquisition of other approved off-site mitigation credits. Prior to implementation of project construction impacts that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the Assistant Deputy Director Environmental Designee for confirmation. c. If credits are not available at a resource agency-approved mitigation site within the Peñasquitos Watershed or through other approved off-site mitigation credits, implementation of habitat creation, restoration, enhancement, and/or preservation would occur through an approved Habitat Mitigation and Monitoring Plan. Under this option, as well as under option a, a Habitat Mitigation and Monitoring Plan shall be provided and prepared in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines. Mitigation shall conform with the Land Development Code—Biology Guidelines, including definitions for creation, restoration, enhancement, and acquisition identified under Environmentally Sensitive Lands regulations; satisfaction of no net loss; timing in relation to proposed project impacts; and generally, with federal and state mitigation requirements. When proposed mitigation involves habitat enhancement, restoration or creation, the Habitat Mitigation and Monitoring Plan shall include all of the following information: • Conceptual planting plan including planting zones, grading, and irrigation • Seed mix/planting palette • Planting specifications • Monitoring program including success criteria • Long-term maintenance and preservation plan For mitigation that involves habitat acquisition, the Habitat Mitigation and Monitoring Plan shall include all of the following:	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		• Location of proposed acquisition • Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact • Documentation that the mitigation area would be adequately preserved and maintained in perpetuity The identification of mitigation site credits shall be provided to the Environmental Designee and shall include the following: • Location of approved mitigation site • Description of the mitigation credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact • Documentation of the credits that are associated with a mitigation bank, which has been approved by the appropriate resource agencies • Documentation in the form of a current mitigation credit ledger **MM BIO 5.3-4 Eelgrass Beds Creation.** Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO 5.3-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be required to occur within Mission Bay itself per the Mission Bay Park Natural Resources Management Plan. The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary. Creation mitigation for potential direct impacts to eelgrass beds resulting from project implementation shall be achieved through replanting of the submerged areas surrounding the expanded marshland habitat in Mission Bay where, as a result of project fill activities to create the marshland habitat, water levels shall be raised to depths suitable for eelgrass establishment. An associated Habitat Mitigation and Monitoring Plan shall be provided or prepared in accordance with the Land Development Code—Biology Guidelines for this creation mitigation and shall include all of the following information: • Planting specifications, including channel bottom elevations • Planting would be scheduled during low energy tides (late summer–early fall) • Monitoring program, including post-project surveys and success criteria • Long-term maintenance and preservation plan **MM BIO 5.3-5 Habitat Restoration in Temporary Impact Areas.** Temporary direct impact areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate.	

Table S-4. Summary of Significant Environmental Impacts

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Habitat restoration and erosion control treatments shall be installed within these short-term impact areas, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines, Multiple Species Conservation Program Subarea Plan, and the City of San Diego's Municipal Code, Land Development Code—Landscape Standards. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedings. Where a proposed project activity involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed where feasible, and the removal shall be monitored by the qualified monitoring biologist to ensure that dispersal of propagules (e.g., seeds, stems, etc.) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the qualified monitoring biologist. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed pest control advisor, using chemicals permitted as safe within aquatic environments. **MM BIO 5.3-6 Pre-Construction Hydroacoustic Study.** Prior to subsequent project-level approval and prior to any construction activities within the waters of Mission Bay, a hydroacoustic study would be required to determine if the activities have potential to generate sound exposure level exceeding the thresholds described in the following table, Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts.	

Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts

Impact Threshold Type	SEL Impact Threshold for Marine Fish (dB)[1]	SEL Impact Threshold for Marine Mammals (dB_{rms})[1]	SEL Impact Threshold for Green Turtles (dB_{rms})[1]
Peak	206	—	—
Accumulated[2]	187	—	—
Impact	—	160	166
Vibratory	—	120	166

Notes: dB = decibels; dB_{rms} = decibel root mean square; SEL = sound exposure level

[1] Source: Merkel & Associates 2017

[2] Accumulated SEL is derived from the number of pile strikes ($SEL_{cumulative}$ = SEL + 10*log[#strikes) as such, the starting SEL would dictate the number of pile strikes possible prior to exceeding the threshold of 187dB $SEL_{cumulative}$

1. If evidence from the study determines that construction activities would result in sound exposure level that would cause indirect hydroacoustic impacts on marine species through exceedance of approved thresholds in the table

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		above, implementation of the measures below would reduce the potential impacts to levels less than significant: a. A City biologist would monitor for the presence of marine species, including green sea turtles, within 500 feet of the work site during construction activities in Mission Bay with potential to generate sound exposure level above the impact thresholds (e.g., pile driving) in order to limit the potential for exposure of the animals. If a marine species subject to the thresholds described above is identified within the 500-foot buffer during construction activities, the biologist will direct crews to halt work until the animal has moved outside the buffer. b. To the extent feasible, sound exposure level reduction measures shall be utilized during all work in Mission Bay with potential to generate hydroacoustic effects on marine resources. These measures would include placing a nylon or wooden block between the impact hammer and piles during pile driving to reduce sound exposure level generated by the hammer strikes or “soft start” approaches to encourage marine species to leave the area surrounding work before full sound exposure level are generated. 2. If evidence from the study determines that no significant exceedances of sound exposure level that would affect marine resources are anticipated from the proposed construction activities, no mitigation measures would be necessary.	
Would the proposed project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	Implementation of the project would have a substantial adverse impact on Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Impacts would be potentially significant.	See **MM BIO 5.3-2** through **MM BIO 5.3-5**.	Less Than Significant
Would the proposed project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?	Implementation of the project would result in substantial adverse impact on wetlands (including but not limited to marsh, vernal pool, and riparian) through direct removal, filling, hydrological interruption, or other means. Impacts would be potentially significant.	See **MM BIO 5.3-2** through **MM BIO 5.3-5**.	Less Than Significant
Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites?	Implementation of the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites. Impacts would be less than significant.	No mitigation measures required	Less Than Significant
Would the proposed project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation	Implementation of the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or	No mitigation measures required.	Less Than Significant

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region?	state Habitat Conservation Plan, either within the MSCP Plan area or in the surrounding region. Impacts would be less than significant.		
Would the proposed project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?	Implementation of the project would not introduce land use within an area adjacent to the MHPA that would result in adverse edge effects. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project conflict with any local policies or ordinances protecting biological resources?	Implementation of the project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant	No mitigation measures required.	Less Than Significant
Would the proposed project result in an introduction of invasive species of plants into a natural open space area?	Implementation of the project could introduce invasive species of plants into a natural open space area. Impacts would be potentially significant.	See **MM BIO 5.3-5**.	Less Than Significant
Greenhouse Gas Emissions			
Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	The significance determination is based on consistency with the City's CAP. The project has demonstrated consistency with the City's CAP. Therefore, impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	The project would be consistent with the City's General Plan, CAP, and Climate Resilient SD Plan. The project would not conflict with or prevent implementation of San Diego Association of Governments' 2021 Regional Plan and California Air Resources Board's 2022 Scoping Plan. Therefore, the project would not conflict with an applicable greenhouse gas plan or policy. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Hazards and Hazardous Materials			
Would the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	The potential for hazards related to wildland fires to visitors of the project area and nearby residences and businesses is considered less than significant due to project design, policies, and components that would not increase wildland fire hazards. Campground areas that allow campfires would neither be located in areas of high vegetation nor be allowed in non-designated areas. Therefore, impacts related to wildland fire risk would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	The project would not introduce land uses that would result in hazardous emissions or exposure of schools to hazardous materials, substances, or waste. As such, the adjacent high school would not be adversely affected by the project. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	Although specific design details are not known at this time, project improvements would be constructed in accordance with requirements for emergency vehicle access, and no components would impair the implementation of or compliance with an adopted Emergency Response/Evacuation Plan. The project would be in compliance with the City's Evacuation Plan. Therefore, impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?	The project could potentially result in encountering contaminated soil during grading and excavation, which could result in adverse health and safety impacts to on-site construction/ grading personnel, as well as cross-contamination in the event that contaminated soil is placed as fill in currently uncontaminated areas. Impacts would be potentially significant.	**MM HAZ 5.5-1 Electrical Transformers.** Prior to any construction or grading activities in project areas containing electrical transformers, construction contractors shall test all on-site electrical transformers for the presence of polychlorinated biphenyls. If polychlorinated biphenyls are detected, hazards and hazardous materials measures shall be implemented per federal and state regulatory requirements until the electrical transformers are removed and disposed of properly.	Less Than Significant

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		MM HAZ 5.5-2 Soil Sampling. Prior to any construction or grading activities in areas of documented soil staining and contaminated soil, including in the vicinity of the former De Anza Cove mobile home park Boneyard, former Campland on the Bay area underground storage tanks, Mission Bay Golf Course hydraulic lift, and electrical transformers, construction contractors shall complete soil sampling to determine whether contamination is present. If elevated concentrations of contaminants (e.g., petroleum compounds, metals, hazardous waste) are present in on-site soils, contaminated soil shall be removed and disposed in accordance with requirements of the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites. **MM HAZ 5.5-3 Contingency Plan.** Prior to the issuance of any construction or grading permits, the project engineer shall ensure that a hazardous material contingency plan is prepared and reviewed to specify procedures for the management of potentially impacted soil (and groundwater) encountered during project construction or demolition. If elevated concentrations of contaminants are detected (i.e., soil discoloration, odor, petroleum sheen, positive photoionization detector readings) in on-site soils during grading and excavation, contaminated soil shall be removed and disposed of in accordance with requirements by the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division. **MM HAZ 5.5-4 Chemical Disposal and Storage.** Prior to the start of future project construction or demolition, any chemicals and potentially hazardous debris in the project area due to prior site use and/or project construction shall be properly characterized and disposed of by City staff or construction contractors in accordance with applicable local, state, and federal guidelines and regulations. All hazardous materials stored and used during construction, including but not limited to fuels, batteries, petroleum products, cleaners, disinfectants, lubricants, and refuse, shall be stored with secondary containment to avoid contaminating the project area.	
Would the proposed project result in a safety hazard for people residing or working in a designated airport influence area?	The project area is not located within a designated airport influence area. Project components would not result in a safety hazard for people residing or working in a designated airport influence area. Impacts from aircraft-related hazards would be less than significant.	No mitigation measures required.	Less Than Significant
Historical, Archaeological, and Tribal Cultural Resources			
Would the proposed project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?	Implementation of the project could result in the alteration of a prehistoric or historic building, structure, object, or site. This impact would be potentially significant.	No mitigation measures proposed.	Significant and Unavoidable
Would the proposed project result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the	Ground-disturbing activities associated with future construction of the project would be located in or near culturally sensitive areas in the northeastern segment of the golf course and northwestern extent of the KFMR/NWP, including unknown resource discoveries during excavation into native soils, and could result in impacts to prehistoric and historic archaeological	**MM HIST 5.6-1 Prehistoric and Historic Archaeological Resources, Sacred Sites, Human Remains, and Tribal Cultural Resources.** Prior to issuance of any permit for a future development project implemented in accordance with the	Significant and Unavoidable

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
disturbance of any human remains, including those interred outside of formal cemeteries?	resources, sacred sites, and human remains, including those interred outside formal cemeteries. This impact would be potentially significant.	proposed project that could directly affect an archaeological or Tribal Cultural Resource in the areas depicted on Figure 5.6-1, Sensitivity Map, including habitat restoration areas, the City of San Diego shall require that the following steps be taken based on the project scope to determine (1) the presence of archaeological or Tribal Cultural Resources and (2) the appropriate level of analysis or mitigation for any significant resources that may be impacted by a development activity. Sites may include but not be limited to privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include sites associated with prehistoric Native American activities. **Initial Determination** The environmental analyst shall determine the likelihood for the project area to contain archaeological or Tribal Cultural Resources by reviewing the site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory Database, South Coastal Information Center records, and the City's Historical Inventory of Important Architects, Structures, and People in San Diego) and may conduct a site visit. A Cultural Resources Sensitivity Map was created from the record search data obtained through the California Historical Resources Inventory System for use as a management tool to aid in the review of future projects within the project area that depicts two levels of sensitivity (Figure 5.6-1). Review of this map shall be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. The Cultural Resources Sensitivity Map, which is not part of any federal or state law, identifies areas of low and moderate cultural resources sensitivity. Areas with low sensitivity do not require further analysis or mitigation. Areas with moderate sensitivity contain recorded cultural resources or have the potential for resources to be encountered, or the significance of the cultural resources within these areas is not known. If there is any evidence that the project area contains archaeological or Tribal Cultural Resources, then an archaeological evaluation consistent with the City's Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines. **Step 1** Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources or is located within a moderate sensitivity area, preparation of an evaluation report shall be required. The evaluation report could generally include background research, field survey, archaeological testing, and analysis. Before field reconnaissance occurs, background research shall be required that shall include a record search at the South Coastal Information Center at San	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		Diego State University. A review of the Sacred Lands File maintained by the California Native American Heritage Commission shall also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any Tribal repositories or museums. Once background research is complete, a field reconnaissance shall be conducted by individuals whose qualifications meet City of San Diego standards. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including but not limited to remote sensing, ground-penetrating radar, human remains detection canines, lidar, and other soil resistivity techniques as determined on a case-by-case basis by the Tribal representative during the project-specific Assembly Bill 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project area contains prehistoric archaeological resources or Tribal Cultural Resources. If, through background research and field surveys, resources are identified, then an evaluation of significance, based on the City Guidelines, shall be performed by a qualified archaeologist. **Step 2** Where a recorded archaeological site or Tribal Cultural Resource (as defined in the California Public Resources Code) is identified, the City of San Diego shall initiate consultation with identified California Native American Tribes pursuant to the provisions in California Public Resources Code, Sections 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. During the consultation process, Tribal representatives shall be involved in making recommendations regarding the significance of a Tribal Cultural Resource that could also be a prehistoric archaeological site. A testing program may be recommended that requires re-evaluation of the project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City of San Diego's Historical Resources Guidelines. Results of the consultation process shall determine the nature and extent of any additional archaeological evaluation or changes to the project. The results from the testing program shall be evaluated against the significance thresholds found in the City of San Diego's Historical Resources Guidelines. If significant historical resources are identified within the area of potential effect, the site may be	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		eligible for local designation. However, this process shall not proceed until Tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report shall be submitted to Historical Resources Board staff for designation. An agreement with each consulting Tribe on the appropriate form of mitigation shall be required prior to distribution of a draft environmental document prepared for the proposed project. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate California Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicate that there is still the potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring shall be required. **Step 3** Per the City's Historical Resources Guidelines, the preferred mitigation for archaeological resources is to avoid and preserve the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not feasible, a Research Design and Archaeological Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When Tribal Cultural Resources are present and also cannot be avoided, appropriate and feasible mitigation shall be determined through the Tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and subject to the provisions as outlined in California Environmental Quality Act Guidelines, Section 15126.4(b)(3)(C-D). The data recovery program must be reviewed and approved by the City's assigned environmental analyst prior to distribution of a draft environmental document for subsequent activities consistent with the project and shall include the results of the Tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as existing development or dense vegetation. A Native American observer shall be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities whenever a Tribal Cultural Resource or any archaeological site located on City of San Diego property, or within the area of potential effect of a City of San Diego project, would be	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code, Section 5097.98, shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area, and the procedures set forth in California Public Resources Code, Section 5097.98; California Health and Safety Code, Section 7050.5; and applicable federal, state, and local regulations shall be followed. These procedures shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored. **Step 4** Archaeological Resource Management Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B, Historical Resources Consultant Qualifications, of the City of San Diego's Historical Resources Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as Traditional Cultural Properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts shall be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the City of San Diego's Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs if required. Archaeological Resource Management Reports shall be prepared in conformance with the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format (see Appendix C of the City of San Diego's Historical Resources Guidelines), which will be used by City of San Diego staff in the review of archaeological resource reports. Consultants must ensure that Archaeological Resource Management Reports are prepared consistent with this checklist. This requirement shall standardize the content and format of all archaeological technical reports submitted to the City of San Diego. A confidential appendix must be submitted (under separate cover), along with Archaeological Resource Management Reports for archaeological sites and Tribal Cultural Resources, containing	

Table S-4. Summary of Significant Environmental Impacts

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D, Historical Resources Report Form, of the City of San Diego's Historical Resources Guidelines may be used when no archaeological resources were identified within the project boundaries. **Step 5** **For Archaeological Resources:** All cultural materials, including original maps, field notes, non-burial-related artifacts, catalog information, and final reports, recovered during public and/or private development projects must be permanently curated with an appropriate institution, one that has the proper facilities and staffing for ensuring research access to the collections consistent with state and federal standards unless otherwise determined during the Tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [California Health and Safety Code, Sections 8010–8011]) and federal (i.e., federal Native American Graves Protection and Repatriation Act [USC 3001–3013]) law and must be treated in a dignified and culturally appropriate manner with respect for the deceased individuals and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation. Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When Tribal Cultural Resources are present, or non-burial-related artifacts associated with Tribal Cultural Resources are suspected to be recovered, the treatment and disposition of such resources shall be determined during the Tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, the Code of Federal Regulations, Title 36, Part 79. Additional information regarding curation is provided in Section II of the City of San Diego's Historical Resources Guidelines.	

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
Would the proposed project result in a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	Implementation of the project could result in ground-disturbing activities that would be located in or near culturally sensitive areas important to Native American Tribes and could result in impacts to TCRs. This impact would be potentially significant.	See **MM HIST 5.6-1**.	Significant and Unavoidable
Hydrology and Water Quality			
Would the proposed project result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?	The project would not result in substantial changes to drainage patterns or increase of impervious surfaces. Conversely, the project would reduce the number of impervious surfaces. The project would also develop additional wetland areas, which would reduce the risk of flooding. Therefore, the project would have a less than significant impact on flooding and drainage patterns.	No mitigation measures required.	Less Than Significant
Would the proposed project result in a substantial increase in pollutant discharges to receiving waters and/or substantial increases in discharges of identified pollutants to an already impaired water body?	Implementation of the project could result in pollutants generated during construction and operation. Pollutants generated during construction would be temporary and be addressed through preparation of a project-specific Stormwater Pollution Prevention Plan and implementation of construction BMPs. The potential long-term pollutants associated with the project would be addressed through the implementation of project area and source control BMPs as defined in the City's Stormwater Standards Manual. A Stormwater Quality Control Plan (SWQMP) must accompany the final design of the project to ensure that runoff generated is adequately captured/treated. Upon preparation and implementation of a SWQMP and implementation of BMPs, per regulatory requirements, impacts associated with water quality would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?	Implementation of the project would result in a reduction of impervious surfaces and would not impede groundwater recharge. Implementation of construction BMPs would be practiced to clean up contaminant spills and would be indicated in the construction Stormwater Pollution Prevention Plan following completion of the project. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Noise			
Would the proposed project result in or create a significant increase in the existing ambient noise levels?	The project would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses. Therefore, project-related impacts to ambient noise would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in an exposure of people to current or future	The project would result in an overall reduction in vehicle trips on weekdays and on weekends. Therefore, the project would not result in the exposure of people to current or future	No mitigation measures required.	Less Than Significant

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
transportation noise levels which exceed guidelines established in the Noise Element of the General Plan?	transportation noise levels that exceed standards established in the City's General Plan Noise Element. Vehicular noise impacts associated with operation of the project would be less than significant.		
Would the proposed project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?	Based on the airport noise contours for San Diego International Airport and Montgomery Field Municipal Airport, no portions of the project are forecasted to experience noise levels due to aircraft operations that exceed 65 dBA CNEL. Therefore, impacts related to aircraft noise levels would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the City's Municipal Code?	During operation, the project is anticipated to result in a reduction in noise from the project area at adjacent noise-sensitive land uses. Further, through enforcement of the Noise Abatement and Control Ordinance of the City's Municipal Code, impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the proposed project result in the exposure of people to significant temporary construction noise?	Project grading and paving activities would potentially exceed the City's Noise Abatement and Control Ordinance standard for construction (75 dBA $Leq_{12\text{-}hr}$) in City's Municipal Code, Section 59.5.0404, by approximately 3 dB when these activities take place adjacent to noise-sensitive receptors (residences and the school's recreational facilities north of the project area). Impacts would be potentially significant.	**MM NOI 5.8-1 Construction Noise Best Management Practices.** During construction of future development within the proposed project area, construction contractors for the project shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in contractor specifications and shall include but not be limited to the following: A. Properly outfit and maintain construction equipment with manufacturer-recommended noise reduction devices to minimize construction-generated noise. B. Operate all diesel equipment with closed engine doors and equip the equipment with factory-recommended mufflers. C. Employ additional noise attenuation techniques, as needed, to reduce excessive noise levels and bring construction noise into compliance with the City of San Diego's Municipal Code, Section 59.5.0404. Such techniques may include but not be limited to the construction of temporary sound barriers or sound blankets between construction sites and nearby noise-sensitive receptors. D. Notify in writing adjacent noise-sensitive receptors within 2 weeks of any construction activity, such as jackhammering, concrete sawing, asphalt removal, and largescale grading operations, that would occur within 150 feet of the property line of the nearest noise-sensitive receptor. The extent and duration of the construction activity shall be included in the notification. E. Designate a "disturbance coordinator" who shall be responsible for receiving and responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, shall require that reasonable measures, such as providing sound barriers or sound blankets between construction sites and the receptor location, locating noisy equipment as far from the receptor as possible, and/or reducing the duration of the noise-	Less Than Significant

Table S-4. Summary of Significant Environmental Impacts			
Environmental Issue	**Results of Impact Analysis**	**Mitigation**	**Impact Level After Mitigation**
		generating construction activity, be implemented to correct the problem.	
Would the proposed project result in the exposure of people to significant groundborne vibration?	Vibration levels from anticipated heavy construction machinery would be below the perception threshold and the damage threshold for fragile structures. Therefore, vibration levels resulting from heavy construction equipment would not result in excessive groundborne vibration levels. Project land uses, including the non-motorized boat rental area, low-cost visitor guest accommodations, and recreational uses, would not typically generate vibration. Construction and operational vibration impacts associated with the project would be less than significant.	No mitigation measures required.	Less Than Significant
Paleontological Resources			
Would the proposed project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit? Would the proposed project result in development that requires over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?	Implementation of the General Grading Guidelines for Paleontological Resources, as required by the City's Municipal Code, Section 142.0151, would ensure that impacts to paleontological resources would be less than significant.	No mitigation measures required.	Less Than Significant
Transportation and Circulation			
Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	Implementation of the project would not restrict or impede connectivity and would not conflict with any adopted policies or plans addressing pedestrian, bicycle, and transit facilities identified in the City's General Plan Mobility Element, the Mobility Choices Program, or the San Diego Association of Governments' 2021 Regional Plan. Therefore, the project's impact on an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities, would be less than significant.	No mitigation measures required.	Less Than Significant
Would the project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?	Implementation of the project would not result in VMT exceeding thresholds identified in the City's Transportation Study Manual (City of San Diego 2020b). Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	The project would include the construction of service roads, vehicular access points, and parking. Although specific design details are not known at this time, improvements would be constructed in accordance with the standards in the San Diego Municipal Code, City's Standard Drawings (City of San Diego 2021b), and City's Street Design Manual (City of San Diego 2017), and implementation of the project would not increase hazards due to a design feature or incompatible uses. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant
Would the project result in inadequate emergency access?	The project's access improvements would be consistent with requirements for emergency vehicle access such as the City's fire apparatus access roadway requirements and would not result in inadequate emergency access. Impacts would be less than significant.	No mitigation measures required.	Less Than Significant

Notes: 2021 Regional Plan = San Diego Forward: The Regional Plan; ALUCP = Airport Land Use Compatibility Plan; BMP = best management practice; CAP = Climate Action Plan; CDFW = California Department of Fish and Wildlife; KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve; MBPMP = Mission Bay Park Master Plan; MHPA = Multi-Habitat Planning Area; MSCP = Multiple Species Conservation Program; TAC = toxic air contaminant; TCR = Tribal Cultural Resource; USFWS = U.S. Fish and Wildlife Service; dB = decibel dBA = A-weighted decibel; CNEL = community noise equivalent level; $L_{eq\ 12\text{-}hr}$ = 12-hour A-weighted equivalent sound level; VMT = vehicle miles traveled

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Chapter 1.0
Introduction

This Draft Program Environmental Impact Report (PEIR) for the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan and associated discretionary actions described in Chapter 3.0, Project Description (collectively referred to throughout this PEIR as the "project"), has been prepared by the City of San Diego (City) in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (California Public Resources Code, Section 21000 et seq.; 14 CCR 15000 et seq.) and in accordance with the City's Environmental Impact Report (EIR) Guidelines (City of San Diego 2005) and the City's CEQA Significance Determination Thresholds (City of San Diego 2022a).

The project analyzed in this PEIR is an amendment to the Mission Bay Park Master Plan (MBPMP), which is a comprehensive planning document that provides a policy framework to guide development throughout Mission Bay. The project includes recommendations pertaining to the project area to serve local and regional recreation needs while preserving the natural resources of the De Anza Cove area. The project aims to expand the park's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change and to align the City with the Climate Resilient SD Plan. The project would enhance and revitalize northeastern Mission Bay through a variety of uses, including guest accommodations (RVs and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Finally, the project recognizes the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area. The project seeks to implement recommendations of the adopted MBPMP. Please refer to Chapter 3.0 for further details regarding the components of the project.

1.1 Project History

The MBPMP EIR was certified in 1994. The certified EIR evaluated the implementation of the MBPMP on the entire MBPMP area, including the project area. Since the certification of the MBPMP EIR, changes in the regulatory environment and physical setting have occurred necessitating additional technical analyses to be performed specific to the project. Accordingly, this PEIR is a program-level

analysis based on more recent technical studies. As a result, this PEIR's determinations regarding potential impacts and mitigation requirements may differ from those described in or anticipated by the MBPMP EIR.

In June 2018, the City initiated a Draft PEIR (2018 Draft PEIR) process for the MBPMP and released the Notice of Preparation (NOP). Preliminary analyses were performed based on the 2018 proposed land use plan (2018 Proposal); however, the 2018 Draft PEIR was never circulated for public review. Based on feedback heard on the MBPMP since the original 2018 NOP was released, the City modified the project in 2022 to fine tune the land uses and increase preservation of natural resources. The City received a Supplemental Environmental Project grant from the Regional Water Quality Control Board (RWQCB) that funds the inclusion of an additional project alternative in this PEIR that would expand habitat restoration opportunities. The inclusion of an expanded wetland project alternative in this PEIR gives City decision-makers the opportunity to consider in depth the scope and scale of future wetland restoration in northeastern Mission Bay.

1.2 Purpose and Intended Uses

1.2.1 PEIR Purpose

The purpose of this PEIR is as follows:

- Inform governmental decision-makers and the general public of the potentially significant environmental effects of the project
- Identify the ways that environmental impacts can be avoided or significantly reduced
- Streamline environmental review for subsequent projects consistent with the project

1.2.2 Intended Use of the PEIR

This PEIR is an informational document that will provide public agency decision-makers; responsible or trustee agencies, as defined under CEQA; other interested public agencies or jurisdictions; and members of the public with information about (1) the potentially significant environmental impacts that would result from the development of the project, (2) possible ways to minimize any significant environmental impacts, and (3) reasonable alternatives to the project (California Public Resources Code, Section 21002.1[a]; 14 CCR 15121[a]). Responsible agencies will use this PEIR to fulfill their legal authority to issue permits for the project.

The City is the lead agency for this PEIR and will perform the entitlement processing of the project. When deciding whether to approve the project, the City Council will use the information in this PEIR to consider potential impacts to the physical environment associated with the project. Subsequent to the certification of the Final PEIR, agencies with permitting authority over all or portions of the project will use the Final PEIR as the basis for their evaluation of the environmental effects related to the project that will culminate with the approval or denial of applicable permits.

1.3 PEIR Legal Authority

1.3.1 Lead Agency

The City is the lead agency for the project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The lead agency, as defined by CEQA Guidelines, Section 15367, is the public agency that has the principal responsibility for carrying out or approving a project. As the lead agency, the City's Planning Department conducted a preliminary review of the project and determined that a PEIR was required. The analysis and findings in this document reflect the independent judgment of the City.

1.3.2 Responsible and Trustee Agencies

Implementation of the project may require subsequent actions involving responsible and trustee agencies. Responsible agencies, as defined by CEQA Guidelines, Section 15381, are public agencies that may have discretionary approval authority for a project, and include but are not limited to the U.S. Army Corps of Engineers (USACE), U.S. Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Department of Transportation, California Coastal Commission (CCC), and San Diego RWQCB. Trustee agencies are defined in Section 15386 of the CEQA Guidelines as agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the State of California, including the California State Lands Commission (Commission) and University of California, San Diego (UC San Diego).

A brief description of some of the primary responsible or trustee agencies that may have an interest in the project is provided below.

1.3.2.1 U.S. Army Corps of Engineers

The USACE has jurisdiction over development in or affecting the navigable waters of the United States pursuant to the Rivers and Harbors Act of 1889 and the Clean Water Act (CWA), as amended. A "navigable water" is generally defined by a blue line as plotted on a U.S. Geological Survey quadrangle map. Projects that include potential dredge or fill impacts to waters of the United States are subject to Section 404 of the CWA. Impacts to waters of the United States (defined as direct fill or indirect effects of fill) greater than 0.5 acre require an individual permit. All permits issued by the USACE are subject to consultation and/or review by the USFWS and the U.S. Environmental Protection Agency (USEPA). No permits from the USACE are required at this time; however, future development projects implemented under the project may require review and/or USACE permits due to dredging activities.

1.3.2.2 U.S. Fish and Wildlife Service

Acting under the federal Endangered Species Act, the USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as the USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, the USFWS will provide input to the USACE as part of the Section 404 process. The role of USFWS is limited within areas covered by the City's Multiple Species Conservation Program (MSCP) Subarea Plan. For listed species covered by the Subarea Plan, the USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City,

the USFWS, and the CDFW in 1997. For future projects that are consistent with the City's MSCP, the City has the authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP covered species list, the wildlife agencies retain permit authority. No permits from the USFWS are required at this time; however, future development projects implemented under the project may require review and/or USFWS permits.

1.3.2.3 California Coastal Commission

The CCC is charged with implementing the California Coastal Act (CCA) of 1976. Chapter 3 of the CCA establishes strong resource protection and coastal development policies for California's Coastal Zone. The CCA is implemented through permitting new development and local planning and regulation. All local governments in the Coastal Zone must prepare Local Coastal Programs (LCPs), which are CCC-certified land use plans, zoning ordinances, and other implementing actions designed to implement the statewide policies of the CCA. Once an LCP is certified, most permitting review and enforcement authority of the CCC is delegated to local governments, subject to appellate review by the CCC in certain circumstances. The CCC retains permitting and enforcement jurisdiction below the mean high tide line, on public trust lands, and in areas not governed by a certified LCP. Development in the Coastal Zone must be evaluated through a permit review process for consistency with the LCPs where they are certified or the CCA where the CCC may retain permitting jurisdiction.

The MBPMP serves as the certified LCP for Mission Bay Park. The project involves a land use amendment to the MBPMP. The CCA requires the CCC to certify amendments to land use plans to ensure their consistency with the requirements of Chapter 3 of the CCA.

1.3.2.4 California State Lands Commission

The Commission protects the lands and resources entrusted to its care through balanced management, marine protection and pollution prevention, adaptation to climate change, and commitment to ensure public access to these lands and waters for current and future generations. The Commission is organized into divisions that include Land Management, External Affairs, Environmental Management and Planning, Mineral Resources Management, and Marine Environmental Protection. The Commission manages 4 million acres of tide and submerged lands and the beds of navigable rivers, streams, lakes, bays, estuaries, inlets, and straits. The open water area of the project is considered to be granted tidelands and submerged lands according to the Commission. This land was granted to the City in September 1945.

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (California Public Resources Code, Sections 6009[c], 6009.1, 6301, and 6306). For the project, the City is trustee of sovereign tide and submerged lands granted by the legislature pursuant to Chapter 142, Statutes of 1945, minerals reserved to the state. All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

1.3.2.5 California Department of Fish and Wildlife

The CDFW has the authority to reach an agreement (Streambed Alteration Agreement) with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to California Fish and Game Code, Section 1600 et seq. The CDFW generally evaluates information gathered during preparation of the environmental documentation and attempts to satisfy their permit concerns in these documents. Where state-listed threatened or endangered species not covered by the City's MSCP occur on a project site, the CDFW would be responsible for the issuance of a Memorandum of Understanding to ensure the conservation, enhancement, protection, and restoration of state-listed threatened or endangered species and their habitats. No permits from the CDFW are required at this time; however, future development projects implemented under the project may require review and/or CDFW permits.

1.3.2.6 San Diego Regional Water Quality Control Board

The San Diego RWQCB regulates water quality through the CWA Section 401 certification process and oversees the National Pollutant Discharge Elimination System Permit No. CAS0109266, which consists of wastewater discharge requirements. The San Diego RWQCB is also responsible for overseeing the development and implementation of Water Quality Improvement Plans as required by the Regional Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region, which includes the City, as well as ensuring that all other MS4 permit requirements are met. No RWQCB permits are required at this time; however, future development projects implemented under the project may require review and/or Section 401 certifications.

1.3.2.7 University of California, San Diego

UC San Diego owns approximately 16 acres of the Kendall-Frost Marsh Reserve. As early as 1942, students and faculty at the Scripps Institution of Oceanography were using the Mission Bay marshes as educational and research sites. The Kendall-Frost Marsh Reserve is protected by chain-link fencing along its upper boundary with City streets and by the property owners' fences along its boundary with the Crown Point Villas. The lower boundary with the City's Northern Wildlife Preserve is not marked because the contiguous wetland (40 acres) is managed as a whole, with the UC San Diego Natural Reserve System coordinating research and teaching use, and the City's Parks and Recreation Department responsible for law enforcement (UC San Diego 2022).

1.4 EIR Type, Scope and Content, and Format

1.4.1 Type of PEIR

This EIR has been prepared as a PEIR, as defined in Section 15168 of the CEQA Guidelines. In accordance with CEQA, this PEIR is a program-level document that examines the environmental impacts of the project, which is composed of a series of actions. The combined actions can be characterized as one large project for the purpose of this study and are herein referred to as the "project." The PEIR focuses primarily on the physical changes in the environment that would result from the adoption and implementation of the project and other related actions described more

fully in Chapter 3.0. This PEIR evaluates all elements of the project, including the construction (short-term) and operational (long-term) impacts associated with its future development.

General Development Plans would be developed over time and provide precise engineering design and construction plans for the recreational elements included in the project. These plans are currently not available; however, their environmental impacts can be estimated at the program level, and a mitigation strategy would be developed that would apply to future improvements. When the General Development Plans are available for all or portions of the project area, the City will evaluate these detailed plans against this PEIR and determine if the analysis and mitigation is adequate or if additional analysis or mitigation is warranted. If, when examining future development actions in the project area, the City finds no new environmental effects could occur or no new mitigation measures would be required other than those analyzed and/or required in this PEIR, the City can approve the activity without additional environmental documentation. If additional analysis is required, it can be streamlined by tiering from this PEIR pursuant to CEQA Guidelines, Sections 15152, 15153, and 15168 (e.g., through preparation of a Mitigated Negative Declaration, Addendum, or Supplemental or Subsequent EIR).

1.4.2 PEIR Scope and Content

The scope of analysis for this PEIR was determined by the City as a result of initial project review and consideration of comments received in response to the NOP circulated January 11, 2022, and a virtual scoping meeting held on January 24, 2022. The virtual NOP scoping meeting can be viewed on the Planning Department's CEQA Policy and Review webpage: https://www.sandiego.gov/planning/work/park-planning/de-anza. The NOP for the analysis of the project, comment letters received during the formal NOP public comment period, and comments made during the scoping meeting are included as Appendix A, Notice of Preparation and Scoping Comments. Through these scoping activities, the project was determined to have the potential to result in significant environmental impacts to the following subject areas:

- Land Use
- Air Quality and Odor
- Biological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Historical, Archaeological, and Tribal Cultural Resources
- Hydrology and Water Quality
- Noise
- Paleontological Resources
- Transportation and Circulation

The intent of this PEIR is to determine whether implementation of the project would have a significant effect on the environment through analysis of the issues identified during the scoping process. Each environmental issue area includes the applicable thresholds of significance based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022a), an issue statement, an assessment of impacts associated with implementation of the project, a summary of the significance of project impacts, and recommendations for mitigation measures, as appropriate. Pursuant to CEQA Guidelines, Section 15126, all discretionary actions associated with the project are considered in this PEIR when evaluating its potential impacts on the environment, including the construction and operation of future development. Impacts are identified as direct or indirect and short-term or long-term and assessed on a plan-to-ground basis. The plan-to-ground analysis addresses the changes or impacts that would result from implementation of the project compared to existing ground conditions.

1.4.3 PEIR Format

1.4.3.1 Organization

A brief overview of the various chapters of this PEIR is provided below:

- **Certification Page.** Includes the document certifying the PEIR.
- **Executive Summary.** Provides a summary of the PEIR; a brief description of the project; an identification of areas of controversy; and a summary table identifying significant impacts, proposed mitigation measures, and the significance of impact after mitigation. A summary of the project alternatives and a comparison of the potential impacts of the alternatives with those of the project are also provided.
- **Chapter 1.0, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.
- **Chapter 2.0, Environmental Setting.** Provides a description of the project's regional context, location, and existing physical characteristics and land uses in the project area. An overview of available public infrastructure and services and the relationship to relevant plans are also provided in this chapter. This chapter also provides background information relevant to each environmental issue area further addressed in Sections 5.1 through 5.10.
- **Chapter 3.0, Project Description.** Provides a detailed discussion of the project, including background, objectives, and key features.
  Chapter 4.0, Regulatory Framework. Summarizes federal, state, and local regulatory documents, plans, and policies relevant to each issue area.
- **Chapter 5.0, Environmental Analysis.** Provides a detailed evaluation of the potential environmental impacts associated with the project for environmental and land use issues. The analysis of each issue begins with a discussion of the existing conditions and a statement of the specific thresholds used to determine the significance of impacts, followed by an evaluation of potential impacts and identification of specific mitigation measures to avoid or reduce significant impacts (if any). A statement regarding the significance of the impact after mitigation is provided.
- **Chapter 6.0, Cumulative Impacts.** Provides an analysis of the impacts of the project in combination with other planned and future development in the region.
- **Chapter 7.0, Other Mandatory Discussion Areas.** Evaluates the potential influence the project may have on economic or population growth within the vicinity of the project area and the region, either directly or indirectly. Identifies the issues determined in the scoping and preliminary environmental review process to not be significant and briefly summarizes the basis for these determinations. Identifies impacts that are significant and unavoidable or irreversible.
- **Chapter 8.0, Alternatives.** Provides a description of the alternatives to the project, including the No Project/No Build Alternative.
- **Chapter 9.0, References Cited.** Lists the references cited in the PEIR.
- **Chapter 10.0, List of Preparers.** Identifies the individuals consulted during preparation of the PEIR and the individuals who prepared the PEIR.

1.4.3.2 Technical Appendices

Technical reports, used as a basis for much of the environmental analysis in the PEIR, have been summarized in the PEIR and are included as appendices to this PEIR. The technical reports prepared for the project and their location in the PEIR are listed in the table of contents.

1.4.3.3 Incorporation by Reference

As permitted by CEQA Guidelines, Section 15150, this PEIR references several technical studies and reports. Information from these documents is briefly summarized in this PEIR, and their relationship to this PEIR is described in the respective chapters. All reference materials are included in Chapter 9.0, References Cited, and are hereby incorporated by reference. The documents are available for review at the City's Planning Department located at 9485 Aero Drive, San Diego, California 92123:

- City's General Plan (City of San Diego 2008a)
- City's Final PEIR for the General Plan (City of San Diego 2008b)
- City's Municipal Code, including the Land Development Code (Chapters 11–15) (City of San Diego 2022b)
- City's Climate Action Plan (City of San Diego 2022c)
- MBPMP, as amended (City of San Diego 2021a)
- MBPMP EIR (City of San Diego 1994)
- Mission Bay Park Natural Resources Management Plan (City of San Diego 1990)
- City's MSCP Subarea Plan (City of San Diego 1997)
- Climate Resilient SD Plan (City of San Diego 2021b)

1.5 PEIR Process

The City, as the lead agency, is responsible for the preparation and review of this PEIR. The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, and the second stage is the Final PEIR.

1.5.1 Draft PEIR

In accordance with the City's Municipal Code, Section 128.0306, and CEQA Guidelines, Section 15105, the Draft PEIR is distributed for review to the public and interested and affected agencies for a review period of 45 days. The purpose of the review period is to allow the public an opportunity to provide comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided and mitigated" (CEQA Guidelines, Section 15204). In accordance with CEQA Guidelines, Sections 15085 and 15087(a)(1), upon completion of the Draft PEIR, a Notice of Completion will be filed with the California Governor's Office of Planning and Research, and a Notice of Availability of the Draft PEIR will be issued in a newspaper of general circulation in the area.

The Draft PEIR and all related technical studies are available for review at the City's Planning Department located at 9485 Aero Drive, San Diego, California 92123, and on the Planning Department's CEQA Policy and Review webpage: https://www.sandiego.gov/planning/programs/ceqa.

1.5.2 Final PEIR

Comments addressing the scope and adequacy of the environmental analysis will be solicited during the Draft PEIR public review. Following the end of the public review period, the City, as the lead agency, will provide written responses to comments received on the Draft PEIR per CEQA Guidelines, Section 15088. All comments and responses will be considered in the review of the PEIR. Detailed responses to the comments received during public review, a Mitigation Monitoring and Reporting Program, Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unmitigable will be prepared and compiled as part of the PEIR finalization process. The Final PEIR will be available for public review at least 14 days before the City Council hearing to provide commenters the opportunity to review the written responses to their comment letters. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR and adopt the Mitigation Monitoring and Reporting Program, Findings of Fact, and Statement of Overriding Considerations as being complete and in accordance with CEQA.

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Chapter 2.0
Environmental Setting

2.1 Project Location

The proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project) area is in the northeastern corner of Mission Bay Park in the City of San Diego (City) (see Figure 2-1, Regional Location). The subject property is approximately 314 acres of land and approximately 191.2 acres of open water for a total of approximately 505.2 acres. As shown on Figure 2-2, Project Vicinity, the project area is bounded to the east by Mission Bay Drive, the north by Grand Avenue (on the eastern portion of the project area) and Pacific Beach Drive (on the western portion), the west by Crown Point Drive, and the south by Mission Bay. The Rose Creek inlet bisects the project area into eastern and western portions.

As shown on Figure 2-2, the project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club, Pacific Beach Playing Fields, other grass playing fields, Mission Bay Golf Course and Practice Center, and De Anza Cove developed area, including a vacated mobile home park and supporting infrastructure, the Mission Bay RV Resort, a public park, a public beach, parking, the Mission Bay multi-use path, the Rose Creek Bikeway, and water areas.

Interstate (I-) 5 and the Los Angeles–San Diego–San Luis Obispo (LOSSAN) rail corridor are adjacent to the eastern project area boundary. The project area is within the Coastal Overlay Zone (COZ). Additionally, portions of the City's Multi-Habitat Planning Area (MHPA) lands are along a portion of Rose Creek.

2.2 Environmental Baseline

To adequately determine the significance of a potential environmental impact, the environmental baseline must be established. As described in California Environmental Quality Act (CEQA) Guidelines, Section 15125(a), an Environmental Impact Report (EIR) must include a description of the physical

environmental conditions in the vicinity of the project as they exist at the time the Notice of Preparation is published.

Additionally, CEQA Guidelines Section 15125(a), states that the existing environmental setting will normally constitute the baseline physical conditions by which a lead agency will determine if an impact is significant. The following discussion provides the environmental setting at the time the Notice of Preparation for the De Anza Natural Amendment to the Mission Bay Park Master Plan (MBPMP) Program Environmental Impact Report (PEIR) was published (January 11, 2022). Therefore, the existing physical characteristics, described below, serve as the environmental baseline for this PEIR.

2.3 Existing Physical Characteristics

2.3.1 Land Use

2.3.1.1 Existing Land Uses

The project area encompasses approximately 314 acres of land and includes approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area is predominately used for recreation and is developed with athletic fields, golf course, and other public parks. Other uses include conserved open space, temporary housing, and a vacated mobile home park. The MBPMP assigns land use designations as shown on Figure 2-3, Existing Land Uses, throughout the MBPMP area, including the project area, which are described in detail below.

a. On-Site Land Uses

Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

The KFMR/NWP is approximately 88 acres consisting mostly of vegetated wetland. It is bordered to the west and north by residential development, to the east by Campland, and to the south by Mission Bay. The University of California, San Diego, manages the KFMR, and the City manages the contiguous remainder of the marsh as the NWP.

Campland on the Bay

Campland is approximately 45.8 acres and directly east of the KFMR/NWP. Campland is on a City-owned leasehold that is privately operated as an RV and tent camping resort and includes the Campland Cantina and public access.

Mission Bay Tennis Center, Athletic Fields, and Golf Course

The northern portion of the project area (approximately 62.6 acres) currently contains active recreational facilities, including the existing Mission Bay Golf Course and Practice Center operated and managed by the City, the Pacific Beach Playing Fields (also known as the Bob McEvoy Field Complex) currently used by the Mission Bay Little League and Pacific Youth Soccer League, the Mission Bay Boat and Ski Club, and tennis courts and clubhouse currently used by the Pacific Beach Tennis Club.

De Anza Cove Developed Area

The De Anza Cove developed area is south of North Mission Bay Drive and east of the Rose Creek inlet. The De Anza Cove developed area consists of an abandoned mobile home park and supporting infrastructure (e.g., roads, utilities, parking lots, and driveways), Mission Bay RV Resort (an existing campground for 260 RV sites), the Mission Bay Park area, and a public beach and parking area. North Mission Bay Drive bisects the De Anza Cove developed area and recreational areas to the north.

b. Surrounding Land Uses

The project area is bounded by Mission Bay to the south, I-5 to the east, Mission Bay Senior High School to the north, residences and commercial uses in Pacific Beach to the north and northeast, and residential and commercial uses and Crown Point Park to the west and southwest.

2.3.1.2 Adopted Mission Bay Park Master Plan

Mission Bay Park is a regional park that serves the residents of San Diego and visitors. The project area falls within the boundaries of the adopted MBPMP—the MBPMP area covers approximately 4,600 acres. The MBPMP area is bounded by the communities of Mission Beach and Pacific Beach to the west and the north, respectively. Mission Bay Park is bordered by I-5 at its eastern edge and by the communities of Ocean Beach, Peninsula, and Midway-Pacific Highway south of Robb Athletic Field and I-8 to the south. The MBPMP includes several land uses, including lease areas, open beach, parkland, playfields, youth camping, wetland habitat, upland preserve, coastal landscape, and salt pannes.

The MBPMP serves as the Local Coastal Plan for this area of the City. The project is subject to the goals and recommendations established in the MBPMP, and the project would be incorporated into the MBPMP as an amendment. The MBPMP was adopted on August 2, 1994, and most recently amended on November 23, 2021, with the Fiesta Island Amendment. The MBPMP recommends revitalization of the De Anza Cove Special Study Area (SSA) to serve regional recreation needs and allow guest accommodations (RVs and other low-cost camping facilities). The goals of the MBPMP include improvement to the park's water quality, including creating additional wetlands and providing hydrologic improvements to safeguard the viability of marsh areas. The MBPMP calls for a waterfront trail, viewing areas, and other passive recreational features to enhance public use of the SSA, and seeks to ensure that leaseholds support Mission Bay recreation use.

The original intent of the SSA was "to be a flexible planning area in which public and private uses can be accommodated under varying intensities and configurations" (City of San Diego 2021). Further, the MBPMP acknowledges the uncertainty of multiple development factors that "currently prevents the generation of more specific land use concepts."

The project is the result of the original MBPMP's deferring the SSA for future study. In the proposed Amendment to the MBPMP, the area formerly designated as the SSA, will now be referred to as "De Anza Natural." The project area includes the following land uses, as identified in the MBPMP.

a. Natural Areas

According to the MBPMP, natural areas are recognized as upland area, wetland area, or open beach. The project area west of the Rose Creek inlet, which incorporates the NWP (part of the KFMR/NWP), and a small portion east of the Rose Creek inlet are designated as wetland. The intent of the natural areas is to provide a natural environment for recreation to mitigate for other disturbed environments and to benefit wildlife.

b. Lease Areas

Dedicated lease areas, which are composed of nonprofit and commercial leases, are meant to contribute to the revenues of the City while providing a variety of recreation opportunities for Mission Bay Park visitors. The project area east of the Rose Creek inlet is designated as a lease area; however, the portion located south of North Mission Bay Drive is designated as the De Anza Cove SSA. The SSA allows for guest accommodations, regional parkland, beach, boating concessions, wetlands, and paths and trails. The intent of the SSA was to be a flexible planning area in which public and private uses can be accommodated under varying intensities and configurations, and the De Anza Natural Amendment implements the policies of the SSA.

c. Regional Parkland

The land surrounding the eastern half of De Anza Cove is designated and would continue to be designated as regional parkland. According to the MBPMP, regional parkland supports activities such as picnicking, kiteflying, Frisbee throwing, informal sports, walking, jogging, bicycling, and in-line/roller skating. These areas typically include sandy beaches backed by ornamental turf, vegetation, and support parking.

d. Active Recreation

Active recreation areas are meant to support land-based active recreational pursuits, including sand volleyball, over-the-line, walking, bicycling, and in-line/roller skating, in Mission Bay Park. A portion of the project area that is immediately east of the Rose Creek inlet and north of North Mission Bay Drive is designated as active recreation. Specifically, this area is designated as existing dedicated athletic fields and potential athletic field expansion areas. MBPMP Recommendation 30 reads, “When and if the Ski Club lease area is vacated, the Pacific Beach Playing Fields could potentially be expanded into this site. However, such an expansion should not preempt the use of this site for hydrologic improvements related to the establishment of a marsh at the outfall of Rose Creek” (City of San Diego 2021). The project would implement this recommendation by expanding wetlands and relocating the sports facilities.

2.3.1.3 Existing Zoning

Zoning implements the land use designations and policies set forth in the City’s General Plan and the MBPMP through development regulations addressing form and design, density, intensity, and permitted uses. The northern portion of the project area is zoned Residential (RS-1-7), and the southern portion does not have an identified zoning classification. Active and passive recreational

uses are permitted in this zone. Regulations pertaining to a specific use may be referenced in the City's Land Development Code.

2.3.2 Air Quality and Odor

2.3.2.1 San Diego Air Basin

The project area is within the San Diego Air Basin (SDAB or basin) and subject to the San Diego County Air Pollution Control District (SDAPCD) guidelines and regulations. The SDAB is one of 15 air basins that geographically divide the State of California. The SDAB is currently classified as a federal non-attainment area for ozone (O_3) and a state non-attainment area for particulate matter less than 10 microns (coarse particulate matter, or PM_{10}), particulate matter less than 2.5 microns (fine particulate matter, or $PM_{2.5}$), and O_3.

The SDAB lies in the southwestern corner of California. It comprises the entire San Diego region, covering 4,260 square miles, and is an area of high air pollution potential. The basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds.

The climate also drives the pollutant levels. The climate of San Diego is classified as Mediterranean, but it is incredibly diverse due to the topography. The climate is dominated by the Pacific High-Pressure Zone, which results in mild, dry summers and mild, wet winters. The Pacific High-Pressure Zone drives the prevailing winds in the SDAB. The winds tend to blow onshore during the daytime and offshore at night. In the fall months, the SDAB is often impacted by Santa Ana winds. These winds are the result of a high-pressure system over the Nevada–Utah region that overcomes the westerly wind pattern and forces hot, dry winds from the east to the Pacific Ocean (SDAPCD 2015). The winds blow the air basin's pollutants out to sea. However, a weak Santa Ana wind can transport air pollution from the South Coast Air Basin and greatly increase the San Diego O_3 concentrations. A strong Santa Ana wind also primes the vegetation for firestorm conditions.

The SDAB experiences frequent temperature inversions. Subsidence inversions occur during the warmer months as descending air associated with the Pacific High-Pressure Zone meets cool marine air. The boundary between the two layers of air creates a temperature inversion that traps pollutants. The other type of inversion, a radiation inversion, develops on winter nights when air near the ground cools by heat radiation and air aloft remains warm. The shallow inversion layer formed between these two air masses also can trap pollutants. As the pollutants become more concentrated in the atmosphere, photochemical reactions occur that produce O_3, which contributes to the formation of smog. Smog is a combination of smoke and other particulates, O_3, hydrocarbons, oxides of nitrogen (NO_x) and other chemically reactive compounds which, under certain conditions of weather and sunlight, may result in a murky brown haze that causes adverse health effects (CARB 2022).

Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland, toward the mountains. During the fall and winter, air quality problems are created due to carbon monoxide (CO) and NO_x emissions. CO concentrations are generally higher in the morning and late evening. In the morning, CO levels are elevated due to cold temperatures and the large number of motor vehicles traveling. Higher CO levels during the late evenings are a result of stagnant atmospheric conditions trapping CO in the area. Since CO is produced almost entirely from

automobiles, the highest CO concentrations in the basin are associated with heavy traffic. Nitrogen dioxide (NO_2) levels are also generally higher during fall and winter days.

2.3.2.2 Pollutants and Effects

a. Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive people from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, sulfur dioxide (SO_2), PM_{10}, $PM_{2.5}$, and lead. These pollutants are discussed in the Air Quality Technical Memorandum (Appendix C).[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

b. Non-Criteria Air Pollutants

Toxic Air Contaminants (TACs). A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources, such as automobiles; and area sources, such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced either on short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter (DPM). DPM is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. The California Air Resources Board (CARB) classified "particulate emissions from diesel-fueled engines," or DPM, as a TAC in August 1998 (17 CCR 93000). DPM is emitted from a broad range of diesel engines—on-road diesel engines of trucks, buses, and cars and off-road diesel engines, including locomotives, marine vessels, and heavy-duty construction equipment. Approximately 70 percent of all airborne cancer risk in California is associated with DPM. To reduce the cancer risk associated with DPM, CARB adopted a Diesel Risk Reduction Plan in 2000 (CARB 2000).

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may

[1] The following descriptions of health effects for each of the criteria air pollutants associated with project construction and operations are based on the USEPA's "Six Common Air Pollutants" (USEPA 2022c) and CARB's Glossary of Air Pollutant Terms (CARB 2023a) published information.

be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine if potential odors would have a significant impact. Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food-processing facilities, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. In addition to the odor source, the distance between the sensitive receptor(s) and the odor source and the local meteorological conditions are considerations in the potential for a project to frequently expose the public to objectionable odors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces), or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations), should also be considered in the evaluation of potential odor nuisance impacts.

2.3.2.3 Local Air Quality

a. San Diego Air Basin Attainment Designation

An area is designated in attainment when it is in compliance with the National Ambient Air Quality Standards (NAAQS) and/or the California Ambient Air Quality Standards (CAAQS). These standards are set by the U.S. Environmental Protection Agency (USEPA) or CARB for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. The criteria pollutants of primary concern that are considered in this analysis are O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead. Although no ambient standards exist for volatile organic compounds or NO_x, they are important as precursors to O_3.

The portion of the SDAB where the project area is located is designated by the USEPA as a non-attainment area for the 8-hour NAAQS for O_3. The SDAB is designated in attainment for all other criteria pollutants under the NAAQS with the exception of PM_{10}, which was determined to be unclassifiable/attainment. The SDAB is currently designated non-attainment for O_3 and particulate matter, PM_{10} and $PM_{2.5}$ under the CAAQS. It is designated attainment for the CAAQS for CO, NO_2, SO_2, lead, and sulfates.

Table 2-1, San Diego Air Basin Attainment Classification, summarizes the SDAB's federal and state attainment designations for each of the criteria pollutants.

Table 2-1. San Diego Air Basin Attainment Classification		
Pollutant	**Federal Designation (NAAQS)**	**State Designation (CAAQS)**
O_3 (1-hour)	Attainment	Non-attainment
O_3 (8-hour)	Non-attainment	Non-attainment
CO	Attainment	Attainment
PM_{10}	Unclassifiable	Non-attainment
$PM_{2.5}$	Attainment	Non-attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen sulfide	(No federal standard)	Unclassified
Visibility-reducing particles	(No federal standard)	Unclassified

Source: SDAPCD 2022.
Notes: CAAQS = California Ambient Air Quality Standards; CO = carbon monoxide; NAAQS= National Ambient Air Quality Standards; NO_2 = nitrogen dioxide; O_3 = ozone; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; SO_2 = sulfur dioxide

b. Air Quality Monitoring Data

The SDAPCD operates a network of ambient air monitoring stations throughout San Diego County (County) that measure ambient concentrations of pollutants and determine whether the ambient air quality meets the CAAQS and the NAAQS. The SDAPCD monitors air quality conditions at 10 locations throughout the basin. The San Diego monitoring station at Kearny Villa Road represents the closest monitoring station to the project area for concentrations for O_3, $PM_{2.5}$, and NO_2. The monitoring station at 533 First Street in El Cajon is the most representative location where PM_{10} concentrations are monitored because the Kearny Villa Road station does not monitor for this pollutant. Ambient concentrations of pollutants and the number of days exceeding the NAAQS and CAAQS from 2019 through 2021 are presented in Table 2-2, Local Ambient Air Quality Data.

Table 2-2. Local Ambient Air Quality Data									
Averaging Time	Unit	Agency/ Method	Ambient Air Quality Standard	Measured Concentration by Year			Exceedances by Year		
				2019	2020	2021	2019	2020	2021
O_3 – Kearny Villa Road, San Diego									
Maximum 1-hour concentration	ppm	State	0.09	0.083	0.123	0.095	0	2	1
Maximum 8-hour concentration	ppm	State/ Federal	0.070	0.076	0.102	0.072	1	12	2
NO_2 – Kearny Villa Road, San Diego									
Maximum 1-hour concentration	ppm	State	0.18	0.046	0.052	0.06	0	0	0
		Federal	0.100	0.046	0.052	0.06	0	0	0
PM_{10} – First Street, El Cajon									
Maximum 24-hour concentration	$\mu g/m^3$	State	50	38.7	—	—	0	—	—
		Federal	150	38.7	—	—		—	—
$PM_{2.5}$ – Kearny Villa Road, San Diego									
Maximum 24-hour concentration	$\mu g/m^3$	Federal	35	16.2	47.5	20.9	0	2	0

Source: CARB 2022.
Notes: $\mu g/m^3$ = micrograms per cubic meter; — = not available; NO_2 = nitrogen dioxide; O_3 = ozone; PM_{10} = particulate matter less than 10 microns; $PM_{2.5}$ = particulate matter less than 2.5 microns; ppm = parts per million
Data taken from CARB's iADAM (http://www.arb.ca.gov/adam).

2.3.3 Biological Resources

2.3.3.1 Physical Characteristics

The physical characteristics of the component areas in the project area are analyzed in the following sections.

a. Kendall-Frost Marsh Reserve/Northern Wildlife Preserve and Campland on the Bay

See Section 2.3.1.1. According to the U.S. Department of Agriculture Web Soil Survey, five soil types are mapped within the KFMR, including Huerhuero-Urban land complex (2 percent to 9 percent slopes), lagoon water, urban land, made land, and tidal flats (USDA 2018), with tidal flats occupying the majority of the area. The elevation within the KFMR/NWP ranges from sea level to 18 feet above mean sea level (amsl). KFM is entirely within the COZ. The KFMR/NWP area is partially within the MHPA of the City's Multiple Species Conservation Program (MSCP) Subarea Plan.

b. Mission Bay Tennis Center, Athletic Fields, and Golf Course

See Section 2.3.1.1. Two soil types are mapped within the Mission Bay Tennis Center, Athletic Fields, and Golf Course area, including lagoon water, and made land (USDA 2018). The elevation within the Mission Bay Tennis Center, Athletic Fields, and Golf Course area ranges between sea level and 19 feet amsl. The Mission Bay Tennis Center, Athletic Fields, and Golf Course area is entirely within the COZ.

The Mission Bay Tennis Center, Athletic Fields, and Golf Course area is not within the MHPA of the City's MSCP Subarea Plan.

c. De Anza Cove Area

The De Anza Cove area is located south of North Mission Bay Drive and west of I-5. This area is bounded to the south by Mission Bay, the west by Campland, the north by the Mission Bay Tennis Center, Athletic Fields, and Golf Course, and the east by I-5 and residential development. The City currently manages all the uses within the De Anza Cove area. Two soil types are mapped within the De Anza Cove area, including lagoon water and made land (USDA 2018). The elevation within the De Anza Cove area ranges from sea level to 12 feet amsl. The De Anza Cove area is entirely within the COZ. The De Anza Cove area is not within the MHPA of the City's MSCP Subarea Plan.

2.3.3.2 Biological Resources

a. Vegetation Communities, Land Covers, and Floral Diversity

A total of 13 vegetation communities and/or land cover types were observed in the project area. The vegetation communities, including wetland and upland (Tier I, II, IIIB, and IV) communities occurring in the project area, are identified in Table 2-3, Wetland Vegetation Communities and Land Cover Types in the Project Area (Acres), and Table 2-4, Upland Vegetation Communities and Land Cover Types in the Project Area (Acres). Also see the wetland and upland vegetation descriptions in the Biological Resources Technical Report (Appendix D).

Table 2-3. Wetland Vegetation Communities and Land Cover Types in the Project Area (Acres)

General Vegetation Type (Holland/ Oberbauer Code)	SDBG Vegetation Community	Tier/ Wetland[1]	Project Component Areas				Other[2] (acres)	Total[3] (acres)
			KFMR/ NWP (acres)	MBTAG (acres)	De Anza Cove (acres)	Existing Campland (acres)		
Disturbed Wetland (Arundo) (11200)	Disturbed Wetland	Wetland	–	0.02	–	–	–	**0.02**
Disturbed Freshwater Marsh (52410)	Freshwater Marsh	Wetland	–	0.38	–	–	–	**0.38**
Southern Coastal Salt Marsh (52120)	Salt Marsh	Wetland	45.64	–	–	0.05	–	**45.69**
Open Water (64100)	Natural Flood Channel/ Marine Habitat	Wetland	0.18	0.51	5.12	–	101.31	**107.12**
Eelgrass Beds (64122)	Eelgrass Beds	Wetland	2.83	–	0.49	5.21	75.21	**83.74**
Tidal Channel (64112)	Marine Habitat	Wetland	2.57	–	–	<0.01	–	**2.57**
Salt Panne (64300)	Salt Panne	Wetland	1.11	–	–	–	–	**1.11**
Mudflat (64300)	Marine Habitat	Wetland	29.55	0.91	0.63	–	3.64	**34.73**
		Total[3]	**81.88**	**1.82**	**6.24**	**5.26**	**180.16**	**275.34**

Source: Appendix D.
Notes: Campland = Campland on the Bay; KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve; MBTAG = Mission Bay Tennis Center, Athletic Fields and Golf Course; SDBG = San Diego Biological Guidelines
[1] City Subarea Plan tiers and wetland identification are from the SDBG (City of San Diego 2018).
[2] Other includes the segments of Mission Bay, Rose Creek, and Mission Bay Drive not included in the project component areas.
[3] Totals may not sum due to rounding.

Table 2-4. Upland Vegetation Communities and Land Cover Types in the Project Area (Acres)

General Vegetation Type (Holland/ Oberbauer Code)	SDBG Vegetation Community	Tier/ Wetland[1]	Project Component Areas				Other[2] (acres)	Total[3] (acres)
			KFMR/ NWP (acres)	MBTAG (acres)	De Anza Cove (acres)	Existing Campland (acres)		
Southern Foredunes (21230)	Southern Foredunes	I	1.35	–	–	–	–	1.35
Diegan Coastal Sage Scrub[4] (32500)	Coastal Sage Scrub	II	2.38	–	–	–	–	2.38
Non-Native Grassland[4] (42200)	Non-Native Grassland	IIIB	0.04	–	–	–	–	0.04
Disturbed (11300)	Disturbed Land	IV	2.09	–	–	1.31	–	3.40
Developed (12000)	Disturbed Land	IV	0.88	61.65	96.91	44.94	18.33	222.71
		Total[3]	**6.74**	**61.65**	**96.91**	**46.25**	**18.33**	**229.88**

Source: Appendix D.
Notes: Campland = Campland on the Bay; KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve; MBTAG = Mission Bay Tennis and Golf; SDBG = San Diego Biological Guidelines
[1] City Subarea Plan tiers and wetland identification are from the SDBG (City of San Diego 2018).
[2] Other includes the segments of Mission Bay, Rose Creek, and Mission Bay Drive not included in the project component areas.
[3] Totals may not sum due to rounding.
[4] Sensitive vegetation community in the SDBG (City of San Diego 2018).

b. Jurisdictional Aquatic Resources

A program-level jurisdictional delineation was conducted in the project area to determine the extent of wetlands and non-wetland waters under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), California Department of Fish and Wildlife, and California Coastal Commission (CCC). A total of 219.49 acres of wetlands and non-wetland waters is in the project area as shown in Table 2-5, Jurisdictional Aquatic Resources in the Project Area (Acres).

Table 2-5. Jurisdictional Aquatic Resources in the Project Area (Acres)		
Jurisdictional Aquatic Resource	**Jurisdiction**	**Acreage**
Wetland and Riparian Areas		
Disturbed Wetland (Arundo)	USACE/RWQCB/CCC/City	0.02
Disturbed Freshwater Marsh	USACE/RWQCB/CCC/City	0.38
Eelgrass	USACE/RWQCB/CCC/City	83.74
Salt Panne	USACE/RWQCB/CCC/City	1.11
Mudflat	USACE/RWQCB/CCC/City	34.73
Southern Coastal Salt Marsh	USACE/RWQCB/CCC/City	45.69
Wetland and Riparian Areas Total		**165.67**
Non-Wetland Waters		
Open Water	USACE/RWQCB/CCC/City	107.12
Tidal Channel	USACE/RWQCB/CCC/City	2.57
Non-Wetland Waters Total		**109.69**
Total		**275.36**

Source: Appendix D.
Notes: City = City of San Diego; CCC = California Coastal Commission; USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board

c. Floral Diversity

In total, 98 species plants, including 58 native species (59 percent) and 40 non-native species (41 percent), were observed in the project area or included on the species list for the KFMR maintained by University of California, San Diego (UC San Diego 2010). A cumulative list of the common and sensitive plant species observed in the project area is provided in the Biological Resources Technical Report (Appendix D).

d. Wildlife Diversity

The project area supports habitat for upland and wetland adapted wildlife species. Coastal scrub, marsh, wetland, and non-native habitats (e.g., non-native grassland) in the project area provide foraging and nesting habitat for migratory and resident bird species and other wildlife species. Coastal scrub along the edges of the project area provides cover and foraging opportunities for wildlife species, including reptiles and mammals. A total of 182 wildlife species, including 145 birds, 10 fish, 18 invertebrates, five mammals, and four reptiles, were observed. Of the 182 wildlife species observed in the project area, 27 species are designated as sensitive (nine of which are MSCP covered species).

e. Sensitive Plant Species

An evaluation of known sensitive plant species records in the La Jolla quadrangle and the surrounding five quadrangles, Point Loma, Del Mar, National City, Poway, and La Mesa (CDFW 2018; CNPS 2018; USFWS 2018), was conducted. Due to the programmatic nature of the project and survey time limitations, focused surveys for sensitive plant species were not conducted, 33 sensitive plant species were determined to have a moderate to high potential to occur in the project area, and three of these species were observed in the project area during field reconnaissance survey efforts. Sensitive plant

species directly observed during previous focused surveys or known to occur in the surrounding region are further described in the Biological Resources Technical Report (Appendix D).

The following sensitive plant species were directly observed in the project area: Palmer's frankenia (*Frankenia palmeri*), San Diego marsh-elder (*Iva hayesiana*), California seablite (*Suaeda californica*), and southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*). The sensitive plant species observed in the project area are described in detail in Biological Resources Technical Report (Appendix D).

f. Sensitive Wildlife Species

An evaluation of known sensitive wildlife species records in the La Jolla quadrangle and the surrounding five quadrangles, Point Loma, Del Mar, National City, Poway, and La Mesa (CDFW 2018; CNPS 2018; USFWS 2018), was conducted. There were 27 sensitive wildlife species that were either directly observed during focused and reconnaissance level surveys in the project area or that were determined to have a moderate or high potential to occur. These species are further described in the Biological Resources Technical Report (Appendix D).

Sensitive wildlife species observed in the project area include American peregrine falcon (*Falco peregrinus anatum*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), black skimmer (*Rynchops niger*), black tern (*Chlidonias niger*), brant (*Branta bernicla*), California brown pelican (*Pelecanus occidentalis californicus*), California gull (*Larus californicus*), California horned lark (*Eremophila alpestris actia*), California least tern (*Sternula antillarum browni*), Caspian tern (*Hydroprogne caspia*), Clark's marsh wren (*Cistothorus palustris clarkae*), common loon (*Gavia immer*), Cooper's hawk (*Accipiter cooperii*), Costa's hummingbird (*Calypte costae*), double-crested cormorant (*Phalacrocorax auritus*), elegant tern (*Thalasseus elegans*), light-footed Ridgway's rail (*Rallus obsoletus levipes*), long-billed curlew (*Numenius americanus*), monarch butterfly (*Danaus plexippus*), northern harrier (*Circus hudsonius*), osprey (*Pandion haliaetus*), reddish egret (*Egretta rufescens*), redhead (*Aythya americana*), rufous hummingbird (*Selasphorus rufus*), Southern California legless lizard (*Anniella stebbinsi*), wandering skipper (*Panoquina errans*), and white-tailed kite (*Elanus leucurus*).

The sensitive wildlife species that were observed in the project area, including those for which focused surveys were conducted, are described in the Biological Resources Technical Report (Appendix D).

g. Wildlife Corridors and Habitat Linkages

The MSCP defines core and linkage areas as those maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside the MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. The project area intersects one core and linkage area, Biological Core and Linkage Area 46, identified in the MSCP. The biological core and linkage area is in the western portion of the project area and partially in the KFMR/NWP and Campland areas. This core and linkage area borders Mission Bay, which functions as a wildlife movement corridor for resident and migratory birds, marine mammals, and fish species both locally and regionally.

2.3.4 Greenhouse Gas Emissions

2.3.4.1 Greenhouse Effect

Climate change refers to any significant change in measures of climate, such as temperature, precipitation, or wind, lasting for an extended period (decades or longer). Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). The greenhouse effect traps heat in the troposphere through a three-fold process: short-wave radiation emitted by the Sun is absorbed by Earth; Earth emits a portion of this energy in the form of long-wave radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit it into space and back toward Earth. This "trapping" of the long-wave (thermal) radiation emitted back toward Earth is the underlying process of the greenhouse effect.

The greenhouse effect is a natural process that contributes to regulating Earth's temperature. Without it, the temperature of Earth would be about zero degrees Fahrenheit (°F) instead of its current 57°F (Qiancheng 1998). Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect.

2.3.4.2 Greenhouse Gases

GHGs include but are not limited to carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), O_3, water vapor, fluorinated gases (hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride [SF_6], and nitrogen trifluoride [NF_3]), chlorofluorocarbons, and hydrochlorofluorocarbons. Some GHGs, such as CO_2, CH_4, and N_2O, occur naturally and are emitted into the atmosphere through natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Manufactured GHGs, which have a much greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons, perfluorocarbons, and SF_6, which are associated with certain industrial products and processes.

The project area is currently a source of anthropogenic GHG emissions, with emissions primarily generated by vehicular traffic and the energy use, solid waste, water supply, and wastewater treatment associated with Campland and the Mission Bay RV Resort. A summary of the most common GHGs and their sources is included in the Greenhouse Gas Emissions Analysis Technical Memorandum (Appendix E).[2]

2.3.4.3 Global Warming Potential

Gases in the atmosphere can contribute to climate change both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other GHGs, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of Earth (e.g., affect cloud formation or albedo) (USEPA 2022a).

[2] The descriptions of GHGs are summarized from the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report (1995), IPCC Fourth Assessment Report (2007), CARB's GHG Inventory Glossary (2023b), and the USEPA's Glossary of Climate Change Terms (2016).

The Intergovernmental Panel on Climate Change (IPCC) developed the global warming potential (GWP) concept to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP of a GHG is defined as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram of a trace substance relative to that of 1 kilogram of a reference gas (IPCC 2014). The reference gas used is CO_2; therefore, GWP-weighted emissions are measured in metric tons (MT) of CO_2 equivalent (CO_2e).

The current version of the California Emissions Estimator Model (CalEEMod version 2020.4.0) assumes that the GWP for CH_4 is 25 (which means that emissions of 1 MT of CH_4 are equivalent to emissions of 25 MT of CO_2), and the GWP for N_2O is 298, based on the IPCC Fourth Assessment Report (IPCC 2007). The GWP values identified in CalEEMod were applied to the project.

2.3.4.4 Potential Effects of Human Activity on Climate Change

Globally, climate change has the potential to affect numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. The 2014 IPCC Synthesis Report indicated that warming of the climate system is unequivocal and since the 1950s, many of the observed changes are unprecedented over decades to millennia. Signs that global climate change has occurred include warming of the atmosphere and ocean, diminished amounts of snow and ice, and rising sea levels (IPCC 2014).

In California, climate change impacts have the potential to affect sea level rise, agriculture, snowpack and water supply, forestry, wildfire risk, public health, and electricity demand and supply. A summary of current and future climate change impacts to resource areas in California is in Safeguarding California: Reducing Climate Risk (CNRA 2018). For a full discussion of climate change impacts to current and future resources, see the Greenhouse Gas Emissions Analysis Technical Memorandum (Appendix E).

2.3.4.5 Federal, State, and City of San Diego Greenhouse Gas Inventories

a. U.S. Environmental Protection Agency Inventory

Per the USEPA's Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2020, total U.S. GHG emissions were approximately 5,981 million metric tons (MMT) CO_2e in 2020. The primary GHG emitted by human activities in the United States was CO_2, which represented approximately 79 percent of total GHG emissions (4,715.7 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil-fuel combustion, which accounted for approximately 72.6 percent of CO_2 emissions in 2020 (4,342.7 MMT CO_2e). Total U.S. GHG emissions have decreased by 7.3 percent from 1990 to 2020 (USEPA 2022b).

b. California Air Resources Board Inventory

According to California's 2000–2019 GHG emissions inventory (2021 edition), California emitted 418 MMT CO_2e in 2018, including emissions resulting from out-of-state electrical generation. The sources of GHG emissions in California include transportation, industry, electric power production from both

in-state and out-of-state sources, residential and commercial activities, agriculture, high GWP substances, and recycling and waste. The transportation sector remains the largest source of GHG emissions in the state. Direct emissions from vehicle tailpipes, off-road transportation sources, and intrastate aviation accounted for almost 40 percent of statewide emissions in 2019. Emissions from the electric power sector comprised 14 percent of 2019 statewide GHG emissions. Between 2001 and 2019, per-capita GHG emissions in California dropped from a peak of 14.0 MT per person in 2001 to 10.5 MT per person in 2019, representing a 25 percent decrease. In addition, total GHG emissions in 2019 were approximately 7.2 MMT CO_2e less than 2018 emissions (CARB 2021).

c. City of San Diego Climate Action Plan

In December 2015, the City adopted a Climate Action Plan (CAP) and was updated in 2022 (City of San Diego 2022). With implementation of the CAP, the City aims to achieve net zero GHG emissions by 2035. It is anticipated that the City would achieve a reduction of 8,774,000 MT CO_2e by 2035 with implementation of the 2022 CAP Update. However, additional reductions would be required to achieve net zero emissions. The CAP relies on significant City and regional actions, continued implementation of federal and state mandates, and local strategies with associated action steps for target attainment. The CAP includes an inventory of the City's GHG emissions for 2019. The San Diego GHG emission source categories and their relative contributions in 2019 are presented in Table 2-6, 2019 Greenhouse Gas Emissions Sources in the City of San Diego.

Table 2-6. 2019 Greenhouse Gas Emissions Sources in the City of San Diego

Source Category	Annual GHG Emissions (MMT CO_2e)	Percentage of Total[1]
Transportation	5.805	55%
Electricity	2.375	23%
Natural Gas	1.911	18%
Solid Waste	0.277	3%
Construction Equipment	0.07	1%
Water	0.068	1%
Wastewater	0.026	<1%
Totals	**10.532**	**100%**

Source: City of San Diego 2022a.
Notes: MMT CO_2e = million metric tons of CO_2 equivalent
[1] Percentage of total has been rounded, and total may not sum due to rounding.

2.3.5 Hazards and Hazardous Materials

2.3.5.1 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) is a state agency responsible for protecting natural resources from fire on land, as designated by the State Board of Forestry and Fire Protection, which has established State Responsibility Areas for which it is responsible. Another authoritative designation includes the Local Responsibility Areas (LRAs), in which local agencies and fire departments retain responsibility in the event of wildfires. To map fire hazards within State Responsibility Areas and LRAs, designation is based on relevant factors such as fuels, terrain, and weather/climate. Very High Fire Hazard Severity Zones were initially developed by CAL FIRE in the mid-

1990s but are now being updated based on improved sciences, mapping techniques, and data analysis. The project area is within an LRA fire hazard severity zone (City of San Diego 2009). Within the LRA, the project area falls outside the Very High Fire Hazard Severity Zone located within the City.

2.3.5.2 Schools

The project area is served by the San Diego Unified School District, which serves more than 100,000 students from pre-school through grade 12 (SDUSD 2022). Crown Point Elementary School is the closest elementary school to the project area, located approximately 0.5 mile west of the western border of the project area. Crown Point Elementary School serves the areas surrounding the project area and north of the project area. Pacific Beach Middle School serves the area north of the project area and is approximately 0.75 mile northwest of Mission Bay. Mission Bay Senior High School is located adjacent to the project area to the north. Mission Bay Senior High School serves the entire area surrounding the project area, north of the project area, and east of the project area.

2.3.5.3 Emergency Evacuation and Response Plans

The Office of Emergency Services is responsible for notifying appropriate agencies when a disaster occurs, coordinating all responding agencies, ensuring that resources are available and mobilized, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public. The Office of Emergency Services staffs the Operational Area Emergency Operations Center, a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council, its governing body.

The City is a participating jurisdiction in the San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), a Countywide plan that identifies risks and ways to minimize damages from natural and human-made disasters (County of San Diego 2017). Local Emergency Operations Plans are intended to help local jurisdictions respond to emergency situations with a coordinated system of emergency service providers and facilities. San Diego's updated Multi-Hazard Functional Plan and modernized Emergency Operations Center identifies resources available for emergency responses related to earthquakes, fires, major rail and roadway accidents, flooding, hazardous materials incidents, terrorism, and civil disturbances.

2.3.5.4 Hazardous Materials Sites

The project area is currently operating as an RV park and recreation destination. Existing development of the area includes parking lots, landscape vegetation, four ball diamonds, eight tennis/volleyball courts, an 18-hole golf course, a country club, community park amenities within De Anza Cove Park, trails for pedestrians and bicyclists, a boat and ski club, the KFMR/NWP, De Anza Cove, Fiesta Bay, and the Rose Creek inlet. No activities that currently occur in the project area are associated with the generation or production of hazardous materials in large quantities.

CEQA requires review of Section 65962.5 of the California Government Code, also known as the "Cortese List," to identify whether the project area crosses or is in proximity to a site known to have had a hazardous materials release or to represent a threat to human health and the environment. California Government Code Section 65962.5 references the preparation of a "list," but many changes

have occurred related to web-based information access since 1992, and this information is now largely available on the websites of the responsible organizations.

The State Water Resources Control Board (SWRCB) GeoTracker database and the California Department of Toxic Substances Control (DTSC) EnviroStor database were reviewed to determine the location, type, and cleanup status of sites within 0.5 mile of De Anza Cove Park. Cleanup sites are described in the Phase I Environmental Site Assessment (ESA) discussion below. EnviroStor and GeoTracker are state databases that track the status and compliance activities of sites undergoing cleanup or remediation under the jurisdiction of the SWRCB and DTSC, respectively. The SWRCB generally oversees site assessment and cleanup activities for land uses and activities with potential for adverse effects on the state's water quality and drinking water supplies (including groundwater), and the DTSC oversees cleanup cases that have resulted in soil contamination that may pose a threat to human health or the environment. These databases are presented as geographic map viewers, and the location of cleanup sites are stored in a point database that can be queried using geographic information systems (GIS).

a. Phase I Environmental Site Assessment

A Phase I ESA (Appendix F, Phase I Environmental Site Assessment Technical Memorandum) was performed on the project area (referred to as "subject property" in the Phase I ESA). The Phase I ESA revealed that the subject property was listed in two of the federal regulatory databases searched by Environmental Data Resources: the Facility Index System database, which indicates that the subject property is listed in regulatory agency databases, and the Emergency Response Notification System database, which indicates that someone requested an emergency response to a spill. The Emergency Response Notification System database listing was related to the De Anza Cove mobile home park when an anonymous call stated that someone had spilled an unknown amount of paint and washed it down the storm drain.

There are four locations on the subject property with Facility Index System listings: Campland, Mission Bay RV Resort, Mission Bay Golf Course, and Sewer Pump Station 41 at 2723 De Anza Road. The subject property was listed in 10 of the state and/or local regulatory database records in five unique locations on the subject property. A brief summary of all of the radius search results can be found in the Regulatory Database Summary Table in the Phase I ESA (Appendix F).

Details for the other three listings on the subject property are as follows:

- The listing for Mission Bay Golf Course, at 2702 North Mission Bay Drive, indicates aboveground storage tanks for gasoline and diesel fuel. It is also permitted for fertilizer, fuel, and oil waste. There have been a few permit violations related to training employees and incomplete inventory. There is also a record indicating that an underground storage tank was removed, but there are no indications of a release to the environment.
- The listing for De Anza Cove mobile home park and Mission Bay RV Resort, at 2727 De Anza Road, pertains to sewage spills related to the mobile homes and trailers. There are also records of hazardous waste removal. No records indicate a release to the environment.
- The listing for Campland, at 2211 Pacific Beach Drive, indicates that three underground storage tanks were removed in 1986. One of the underground storage tanks failed a leak test. The leak was cleaned up and the case was closed in 1988. The site has permits for fertilizer,

oil, propane, sodium hypochlorite, gasoline, waste oil, used batteries, and paint sludge. There have been a few violations related to housekeeping and administrative issues.

In total, 96 sites (at 51 unique addresses) within the search radius of the project area, were identified in the federal and state regulatory databases searched by the Environmental Data Resources. Of the 51 addresses, 22 are for hazardous material business plans or handling. The remaining 29 had a release to the environment; 23 have received closure for the cleanup, and six locations still have open cases. None of these is located on the subject property.

2.3.5.5 Aircraft-Related Hazards

The San Diego International Airport (SDIA), Marine Corps Air Station Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport are within the City. The SDIA, at Lindbergh Field, and Montgomery-Gibbs Executive Airport are the closest airports to the project area, both approximately 4 miles from the project area. However, the project area is not located within the airport influence area of either Montgomery-Gibbs Executive Airport or SDIA and, thus, would not be subject to either Airport Land Use Compatibility Plan (SDCRRA 2014).

2.3.6 Historical, Archaeological, and Tribal Cultural Resources

2.3.6.1 Background

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a time frame of at least the last 10,000 years and include both the prehistoric and historic periods. For the purposes of this PEIR, historical resources consist of archaeological sites and built environment resources determined as significant under CEQA.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil and the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a Native American tribe and is either on or eligible for listing on the national, state, or local historic register or which the lead agency, at its discretion, chooses to identify as a Tribal Cultural Resource.

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition from an archaeological context: Paleoindian (pre-5500 BC), Archaic (8000

BC–AD 500), Late Prehistoric (AD 500–1769), and Ethnohistoric (post-AD 1769). It is important to note that Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

a. Prehistory and Ethnohistory

The prehistoric cultural sequence for what is now San Diego County is generally thought of as three basic periods: Paleoindian, locally characterized by the San Dieguito complex; Archaic, characterized by the cobble and core technology of the La Jollan and Pauma complexes; and Late Prehistoric, marked by the appearance of ceramics, small arrow points, and cremation burial practices. Late Prehistoric materials in southern San Diego County, known as Yuman I and Yuman II, are believed to represent the ancestral Kumeyaay (also known as the Ipay/Tipay).

The Kumeyaay have roots that extend thousands of years in the County and northern Baja California and are the identified most likely descendants for all Native American human remains found in the City. The pre-contact cultural sequences noted above are locally characterized by the material culture recovered during archaeological investigations as early as the 1920s and, through early accounts of Native American life in San Diego, recorded as a means to salvage scientific knowledge of native lifeways. The San Diego area in general, including Old Town, the San Diego River Valley, and the City as it existed as late as the 1920s, was known as *qapai* (meaning uncertain). According to Kumeyaay elder Jane Dumas, some native speakers referred to what is now I-8 as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast.

The Ethnohistoric period, sometimes referred to as the ethnographic present, commences with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay. The coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways.

Kumeyaay villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. This was true for the project area, specifically with respect to the San Diego River, which at one time flowed directly into False Bay. The river once provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of *Kosaii* (also known as *Cosoy* or *Kosa'aay*) near the mouth of the San Diego River (Gallegos et al. 1998; Kroeber 1925), which took its name from the Kumeyaay word for drying place or dry place (Dumas 2011). This ranchería appears in the earliest of Spanish travelogues for the area and was the village closest to the Presidio near the mouth of the San Diego River. Several investigations have identified possible locations for the village of *Cosoy*/*Kosaii*/*Kosa'aay* (Clement and Van Bueren 1993; Felton 1996), but the actual site has never been found. Several other village sites or settlement areas have been documented through ethnographic accounts and archaeological investigations in the area, specifically *Onap,* a ranchería of a large settlement located in Rose Canyon; a large village west of the I-5 in present-day Pacific Beach known as *hamo, jamo*, or *Rinconada de Jamo* in present-day Pacific Beach, north of the project area and west of the I-5*;* and farther to the north was a prominent

ranchería located in present-day Sorrento Valley known *as Ystagua* or *istagua*, a Spanish gloss of *istaawah* or *istawah*, and means "worm's (larvae) house." Prior to the development of the modern communities that exist today, the Kumeyaay inhabitants of these villages would have exploited the mud flats, shorelines and adjacent creeks of False Bay for the rich shellfish resources, and hunted small game attracted to the natural source of water. This would have been important for their continued survival in this area, especially after contact with the Spanish in 1769, and through the Mexican (1821) and American (1848) periods of occupation in the County.

b. Spanish, Mexican and Early American Periods

Spanish colonization of Alta California began in 1769 (1769–1821). While camp was initially set up near present-day Downtown San Diego, the settlement was soon moved closer to the San Diego River, near the Kumeyaay village of *Kosti/Cosoy/Kosaii/Kosa'aay* below present-day Presidio Park. By 1774, the Mission San Diego de Alcalá was moved up the river valley to its current location in Mission Valley, while the Presidio remained on Presidio Hill.

The Spanish period represents a time of European exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the Mission San Diego de Alcalá. The mission system used Native American labor to build the infrastructure needed for European settlement. Traditional lifeways were disrupted, and Native American populations became tied economically to the missions. In addition to providing new construction methods and architectural styles, the mission system introduced horses, cattle, and other agricultural goods and implements to the area. The cultural systems and institutions established by the Spanish continued to influence the region beyond 1821, when California came under the rule of newly independent Mexico.

The Mexican period (1821–1848) retained many of the Spanish institutions and laws. In 1834, the mission system was secularized, allowing for increased Mexican settlement and the associated dispossession of many local Native Americans. In the 1830s, the Mexican government began to redistribute church lands under the rancho system. The Mexican government granted 29 ranchos in the County to loyal soldiers, politicians, and powerful landowning families (San Diego State University 2011). The land was used primarily for grazing cattle (Pourade 1963). Cattle ranching dominated the agricultural activities, and the hide and tallow trade flourished in California during the early part of this period.

This redistribution of land also resulted in the creation of a civilian pueblo in San Diego. In 1834, a group of San Diego residents living near present-day Old Town successfully petitioned the governor to formally declare their settlement as a pueblo. San Diego was granted official pueblo status, which came with the right to self-government and exemption from military rule (Crane 1991). In addition to the creation of a new town government, "a major consequence of San Diego's being given pueblo status was the eventual acquisition of vast communal lands. In May 1846, Governor Pío Pico confirmed San Diego's ownership of 48,000 acres including water rights. It was the largest such concession ever given to a Mexican town in California. The grant, a heritage of the Mexican government, was a rich resource that subsidized much of San Diego's municipal development well into the twentieth century" (San Diego State University 2011).

The Pueblo Lands of San Diego were divided into 1,350 parcels, ranging in size from 10-acre parcels near Old Town to 160-acre parcels further from town. A large "City Reservation" was set aside for parkland as part of the Pueblo Lands, and still serves the City in that capacity today as Balboa Park. The Mexican period ended when Mexico ceded California to the United States after the Mexican-American War (1846–1848).

Very early in the American period (1848–present), gold was discovered in California. Few Mexican-owned ranchos remained intact because of land claim disputes and the onerous system set up for proving ownership to the U.S. Government. As early as 1868, San Diego was promoted as a natural sanitarium, and many people suffering from tuberculosis came to the area seeking a cure in the moderate climate.

Mission Bay remained a tidal marsh until the USACE attempted to reroute the terminus of the San Diego River into the bay in 1853. The structure, known as the Derby Dike, lasted 2 years until it was washed away by a flood. Aside from this temporary development, Mission Bay was largely undeveloped and used as sheep pasture and for outdoor sports until the 1880s, when the bay's commercial potential was realized. In the 1920s, entrepreneur John D. Spreckels subdivided Mission Beach, constructed an amusement park, and built the La Jolla Streetcar. In 1929, Mission Bay was incorporated into the California State Park System.

2.3.6.2 Methodology

A Cultural Resources Constraints Technical Memorandum (Appendix G) was prepared for the project. Appendix G describes the prehistory of the project area, identifies known significant archaeological resources (prehistoric and historic periods), provides guidance on the identification of possible new significant archaeological resources, and includes recommendations for treatment of significant archaeological resources. It also provides information regarding the historical development of the area, a listing of all buildings in the project area and their date of construction, and a brief description of each property currently 45 years old or older.

a. Prehistoric and Archaeological Resources

Cultural sensitivity levels for the project area are rated low, moderate, or high based on the results of an archival records search conducted at the South Coastal Information Center at San Diego State University, a Sacred Lands File check by the California Native American Heritage Commission (NAHC), and regional environmental factors.

A low sensitivity rating indicates few or no previously recorded resources within the area. Resources at this level would not be expected to be complex, with little to no site structure or artifact diversity. The potential for identification of additional resources in such areas would be low. A moderate sensitivity rating indicates that some previously recorded resources were identified within the area. These are more complex resources consisting of more site structure, diversity of feature types, and diversity of artifact types. The potential for the presence of additional resources in such areas would be moderate.

Areas identified as high sensitivity would indicate that the records search identified several previously recorded sites within the area. These resources may range from moderately complex to highly complex, with more-defined living areas or specialized work space areas, and a large breadth of

features and artifact assemblages. The potential for identification of additional resources in such areas would be high. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted archaeological resources.

Archival Research

An examination of existing maps, records, and reports was conducted to determine if the project could potentially impact previously recorded cultural resources, as described in Appendix G. A records search was conducted on June 26, 2018, of data obtained from the South Coastal Information Center at San Diego State University. The search encompassed the area of potential effect (APE) and a 1-mile buffer around the APE. The purpose of the records search is to identify any previously recorded resources that may be located in or adjacent to the project area and to identify previous studies in the project vicinity. In addition to a review of previously prepared site records and reports, the records search also reviewed historical maps of the project area, ethnographies, the National Register of Historic Places, the California Register of Historical Resources, the California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility. A search of the National Oceanic and Atmospheric Administration's Wrecks and Obstructions Database identified no shipwrecks within 1 mile of the project APE (NOAA 2018).

Previously Identified Cultural Resources

The records search identified 64 cultural resources within 0.25 mile of the APE. The prehistoric sites include two lithic and shell scatters and the ethnographic village of *La Rinconada de Jamo*. The historic-period sites include a railroad bridge, three refuse scatters, two schools, a commercial district, a residential district, and 140 historic buildings. Of the 64 resources identified within 0.25 mile of the APE, two cultural resources intersect the project area: P-37-005017 and P-37-011571, further described below; see Table 2-7, Previously Recorded Resources Within/Adjacent to the Project Area.

Table 2-7. Previously Recorded Resources Within/Adjacent to the Project Area

Resource Number (P-37-#)	Resource Number (CA-SDI-#)	Description	Significance
005017[1]	5017[1]	Ethnohistoric village of *La Rinconada de Jamo*, includes areas of deep midden deposits, ground stone, flaked stone, shell	Significant
011571	11571	Recorded as slough margin intermittent camping; marine shell and lithic artifacts (mainly debitage)	Not Significant

Notes:
[1] Resource previously mapped within, or partially within project area.

P-37-005017; CA-SDI-5017

This resource consists of *La Rinconada de Jamo*, an ethnohistoric Native American village located at the mouth of Rose Canyon. The site was recorded by archaeologists in the late 1970s and described

as a large habitation site that includes many cobble hearth features, scattered ground and flaked stone artifacts, and midden soil with burned shell. In 1986, an archaeological index of the site was constructed with the focus of documenting the extent and variation of the cultural deposit at the time to measure future preservation and research efforts. The index identified groundstone tools, flaked stone tools, ceramics, bone artifacts, shell, historic artifacts, charcoal, and other habitation debris. The presence of a ceramic pipe and red-tailed hawk remains was interpreted as evidence of ceremonial activities. The rich midden deposits reached a depth of at least 2 meters (approximately 6.5 feet). The site has been repeatedly tested and monitored for development efforts. All previous reports noted that the area has been highly modified and developed, with much of the land being plowed by the 1970s. In spite of the previous developments, midden soil was observed during excavations. While monitoring excavations for the installation of storm sewer improvements, archaeologists identified midden soil under fill soil as deep as 1.5 meters (approximately 5 feet). This resource boundary is very large and encompasses the northern portion of the APE. In 2013, LSA conducted a geoarchaeological investigation to determine if archaeological remnants of the ethnohistoric village site of *La Rinconada de Jamo* (P-37-005017) are located within the Mission Bay Golf Course in the project area (Appendix G). Fifty-nine sediment cores were drilled at intervals in the golf course to depths of eight 8 feet. Many of the borings were located inside the reported boundary of P-37-005017, but all 59 sediment cores were negative for cultural resources. The geoarchaeological investigation identified artificial fill down to 8 feet in most locations of the project area. Shallow native soil was identified in the northeastern portion of the golf course.

P-37-011571; CA-SDI-11571

This resource consists of a prehistoric lithic and shell scatter located on Crown Point that was originally recorded by Malcom Rogers. The site included shell midden exposed in cliff faces with a scant scatter of lithic flakes. Seven trenches were excavated in 1992 across Crown Point, which identified five pieces of lithic debitage but no cultural resources. Archaeological monitoring at the construction of private residences has identified few lithic artifacts and scatters of marine shell. This resource boundary is very large and intersects with the westernmost extent of the KFMR/NWP portion of the APE.

Native American Heritage Commission Sacred Lands File Search

A search of the NAHC Sacred Lands File was conducted for the project APE on June 25, 2018 (Appendix G). The NAHC responded on June 27, 2018, indicating that, although the search was negative for the presence of Native American sites, the absence of specific site information in the Sacred Lands File does not indicate the absence of Native American cultural resources in any APE, and a list of tribes culturally affiliated with the project area was provided by the NAHC to provide input or recommend others with specific knowledge. In addition, an extensive survey of the project area included a Native American Kumeyaay monitor from Red Tail Environmental, Inc. Tribal consultation conducted pursuant to Senate Bill 18 and Assembly Bill 52 is discussed, Historical, Archaeological, and Tribal Cultural Resources.

Survey

The survey of the project APE was conducted on June 22, 2018 (Appendix G). The APE is located in a highly developed area, large portions of the APE surface are covered by buildings, pavement, and

landscaping, obscuring any remnants of archaeological sites. The survey team conducted a reconnaissance survey of the APE. The KFMR/NWP portion of the project APE consists of wetlands, portions of which are subject to rising tidal water. It is unlikely that these areas contain intact cultural sites due to the varying water levels and unstable terrain. Because the KFMR/NWP portion of the APE would be preserved as wetlands and would not be impacted by the project, this portion of the APE was not surveyed.

Less-developed portions of the APE, such as exposed soils along construction lines or dirt parking lots, were surveyed using transects at 15-meter intervals. Portions of the APE that were completely developed or covered in landscape, such as the fairways of the active golf course, were not subject to pedestrian survey.

Documentation of cultural resources complies with the Office of Historic Preservation and Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716-44740) and the California Office of Historic Preservation Planning Bulletin Number 4(a). All sites identified during this inventory were recorded on California Department of Parks and Recreation Form DPR 523 (Series 1/95), using the Instructions for Recording Cultural Resources (OHP 1995).

Visibility throughout the project APE varied greatly. Campland; Mission Bay Tennis Center, Athletic Fields, and Golf Course; and the De Anza Cove area are completely covered by pavement, buildings, and landscaping. While there was 100 percent ground visibility along the beaches of the De Anza Cove area, other undeveloped areas were covered by thick wetland vegetation.

b. Historical Resources

The project area contains a total of eight properties, six of which have built environment resources over 45 years old and would be subject to review for potential impacts to historical resources pursuant to the requirements of Section 143 of the City's Municipal Code; see Table 2-8, Properties in the Project Area. These properties are described in detail in Appendix H, Historical Resources Constraints Technical Memorandum.

Table 2-8. Properties in the Project Area

Current Name	Date of Construction
Mission Bay Golf Course and Practice Center	c. 1955
Pacific Beach Tennis Club and Bob McEvoy Youth Fields	c. 1961
Mission Bay RV Resort	c. 1955
Mission Bay Boat and Ski Club	c. 1963
De Anza Cove mobile home park	c. 1965
Campland on the Bay	c. 1969
De Anza Cove Park public restroom and shower	1997–2001
De Anza Cove Park Pavilion	1997–2001

2.3.7 Hydrology and Water Quality

2.3.7.1 Watersheds

A watershed (also called a drainage basin or catchment) is an area of land that drains streams and rainfall to a common outlet such as the outflow of a reservoir, mouth of a bay, or any point along a stream channel. Larger watersheds encompass many smaller watersheds; as such, watersheds can often be identified differently for the same site, depending on the scale of interest. The Basin Plan identifies watersheds using the terms hydrologic unit (HU), hydrologic area (HA), and watershed management area. The Basin Plan defines an HU as the entire watershed or one or more major streams (RWQCB 2021). An HA consists of watersheds of major tributaries and groundwater basins within an HU. A watershed management area is an area in which one or more watersheds (HAs and HUs) are evaluated by the RWQCB and usually a part of a water quality improvement plan and/or comprehensive load reduction plan. As set forth in the Basin Plan, the San Diego region consists of 11 HUs and 54 HAs.

The project area is in the Peñasquitos HU. The Peñasquitos HU is a triangular-shaped area of approximately 170 square miles, extending from the City of Poway on the east to the community of La Jolla on the west (RWQCB 2021). As shown on Figure 2-4, Peñasquitos Hydrologic Unit, the Peñasquitos HU is composed of five HAs: Miramar Reservoir, Poway, Scripps, Miramar, and Tecolote. Small finger canyons drain into three main creeks—Carmel Valley Creek, Los Peñasquitos Creek, and Carroll Canyon Creek—that lead into the Los Peñasquitos Lagoon and ultimately the Pacific Ocean near the community of Del Mar. There are no major streams in the Peñasquitos HU although it is drained by numerous creeks/drainages. Miramar Reservoir is the Peñasquitos HU's major storage facility that contains water imported from the Colorado River.

The Peñasquitos HU contains two coastal lagoons: Sorrento Lagoon and Mission Bay. Sorrento Lagoon (also known as Los Peñasquitos Lagoon) is the mouth of the Peñasquitos Creek and discharges into the Pacific Ocean near the northern boundary of the City. Mission Bay and the mouth of the San Diego River form an approximately 4,000-acre aquatic park.

Rose Creek is the primary source of fresh water to the project area, with most freshwater inflow occurring during the winter and spring months, when the San Diego region typically receives most of its precipitation. Storm drains also contribute flows to the project area, primarily during wet weather but also during dry weather in the form of urban runoff. Rose Creek flows through various land use areas and developments, drainage areas, ground cover types, slopes and elevations, and soil types before flowing through the project area. Rose Creek eventually empties into Mission Bay.

2.3.7.2 Flooding and Drainage

The Federal Emergency Management Agency (FEMA) is an agency of the U.S. Department of Homeland Security that is responsible for coordinating the federal government's response to disasters. FEMA regulates and determines areas with a potential for hazards to human health and safety, including flood hazards. Flood Zones are zones that are designated by FEMA to quantify the annual chance that an area will be inundated by a flood event. Special Flood Hazard Areas are identified on FEMA's Flood Insurance Rate Maps. Special Flood Hazard Areas are defined as the area that will be inundated by

the flood event having a 1 percent chance of being equaled or exceeded in any given year. The 1 percent annual-chance flood is also referred to as the base flood, or 100-year flood. Moderate flood hazard areas are also shown on the Flood Insurance Rate Maps and are the areas between the limits of the base flood and the 0.2 percent annual-chance (or 500-year) flood. Areas of minimal flood hazard are outside the Special Flood Hazard Area and higher than the elevation of the 0.2 percent annual-chance flood (FEMA 2019).

The project area is located within areas designated by FEMA to constitute potential flooding hazards. As shown on Figure 2-5, Flood Zones, the majority of the northeastern portion of the project area is located within "other areas of flood hazard" (500 year flood zone), specifically the 0.2 percent-annual-chance flood hazard, areas of 1 percent-annual-chance flood with average depth less than 1 foot, or with drainage areas of less than 1 square mile (FEMA 2019). The 0.2 percent-annual-chance flood zone also covers the western portion of the project area along the shoreline, but not over the salt marshes. The 0.2 percent-annual-chance flood zone also encompasses the eastern portion of the project area along the shoreline of Mission Bay and areas along either side of the Rose Creek inlet (i.e., Rose Creek), which transects the center of the project area. The Rose Creek inlet and all of Mission Bay are designated as 100 flood year flood zone, a regulatory floodway with a flood elevation level of 6 feet due to the likelihood of water elevation change with the tide. The northeastern portion of the project area is at a relatively higher elevation than other portions of the site, located within the area of minimal flood hazard, as is the central portion of the project area that contains Campland.

The project area is located within a highly urbanized area and the majority of stormwater both on the site and in the surrounding area flows to drainage inlets along roadways and parking lots. Localized drainage near the shorelines drains directly to Mission Bay. The project area is relatively flat with a slight downward slope to the south toward the bay. The Rose Creek inlet is the only major drainage that transects the land portions of the project area.

Rose Creek is a major drainage of the area north of Mission Bay. Rose Creek's tributaries are unnamed and begin northeast of Mission Bay near Scripps Ranch, north of Fortuna Mountain. These tributaries then traverse westward through Miramar, both on the northern and southern sides of Marine Corps Air Station Miramar, after which they converge near I-5 and flow south, becoming the Rose Creek inlet where it eventually discharges into Mission Bay and then into the Pacific Ocean.

2.3.7.3 Water Quality

Mission Bay is one of eight major receiving waters within the City. Several portions within Mission Bay and its shorelines are listed on the 2020–2022 California Integrated Report for impairments (Clean Water Act Section 303[d] List/305[b] Report) (SWRCB 2022). Portions of the bay listed for impairments are shown in Table 2-9, Clean Water Act 303(d) List for Regional Board 9 – San Diego Region. Water quality in Mission Bay is generally lower than that of the coastal ocean water due to poor flushing characteristics of the bay and the input of nutrients and contaminants from stormwater runoff and other sources. Sludge from the City's Point Loma Wastewater Treatment Plant, approximately 11 miles south of the project area, is piped to Fiesta Island within Mission Bay to be used as a soil conditioner and fertilizer for the island (RWQCB 2021).

Table 2-9. Clean Water Act 303(d) List for Regional Board 9 – San Diego Region			
Water Body Name	**Water Body Type**	**Pollutant(s)**	**Source**
Mission Bay	Coastal and Bay Shoreline	Mercury	Unknown
Mission Bay	Coastal and Bay Shoreline	Polychlorinated biphenyls	Unknown
Mission Bay (area at mouth of Rose Creek only)	Bay and Harbor	Lead, Eutrophic	Unknown
Mission Bay (area at mouth of Tecolote Creek only)	Bay and Harbor	Lead, Eutrophic	Unknown
Mission Bay at Quivira Basin	Bay and Harbor	Copper	Unknown
Mission Bay Shoreline at Bonita Cove	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Bonita Cove (eastern shore)	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Campland	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at De Anza Cove	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Enchanted Cove	Coastal and Bay Shoreline	Trash	Unknown
Mission Bay Shoreline at Fanuel Park	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Fiesta Island northwestern shore	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Leisure Lagoon	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at North Cove Beach	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Tecolote Shores	Coastal and Bay Shoreline	Indicator Bacteria	Unknown
Mission Bay Shoreline at Visitors Center	Coastal and Bay Shoreline	Indicator Bacteria	Unknown

Source: SWRCB 2022.
Notes: Campland = Campland on the Bay

Due to the high volume of in-water human activity, nearby landscaped areas, and urban runoff, water quality impairments within Mission Bay are likely due to nonpoint sources of nearby and in-water activities. Pollutants in stormwater runoff are a primary cause of water quality degradation in urbanized areas due to inadequate runoff treatment facilities and control measures prior to discharging to a natural drainage or watercourse, such as Mission Bay. Growth in the City and the San Diego region have increased pressure on improving the quality of stormwater runoff and protecting local surface waters and resources. Urbanization has the potential to increase pollutants in stormwater due to the high surface area of impervious surfaces that can readily transport oils, greases, nutrients, and other chemicals that would normally infiltrate the soil and be filtered naturally.

Being impaired (also referred to as "water quality limited") means that a water body is "not reasonably expected to attain or maintain water quality standards" without additional regulation. The Clean

Water Act requires that each state develop Total Maximum Daily Loads for each impaired water body in the nation, which specifies the maximum amount of a pollutant that a water body can receive and still meet water quality standards. A Total Maximum Daily Load is required but has not yet been developed for Mission Bay for the above-listed impairments (SWRCB 2021).

a. Beneficial Uses

State policy for water quality control in California is directed toward achieving the highest water quality consistent with maximum benefits to the people of the state. Aquatic ecosystems and underground aquifers provide numerous different benefits to the people of the state. Beneficial uses of surface waters, groundwater, marshes, and wetlands serve as a basis for establishing water quality objectives and discharge prohibitions to attain those goals. Table 2-10, Beneficial Uses in Mission Bay, defines the beneficial uses within Mission Bay and whether an existing beneficial use has been designated for the bay.

Table 2-10. Beneficial Uses in Mission Bay

Beneficial Use Code	Beneficial Use Description	Existing Use Designated?
MUN	*Municipal and Domestic Supply* – Includes uses of water for community, military, or individual water supply systems, including but not limited to drinking water supply.	No
IND	*Industrial Service Supply* – Includes uses of water for industrial activities that do not depend primarily on water quality, including but not limited to mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.	Yes
NAV	*Navigation* – Includes uses of water for shipping, travel, or other transportation by private, military, or commercial vessels.	No
REC1	*Contact Water Recreation* – Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include but are not limited to swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural hot springs.	Yes
REC2	*Non-Contact Water Recreation* – Includes uses of water for recreational activities involving proximity to water but not normally involving body contact with water where ingestion is reasonably possible. These uses include but are not limited to picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.	Yes
COMM	*Commercial and Sport Fishing* – Includes uses of water for commercial or recreational collection of fish, shellfish, or other organisms, including but not limited to uses involving organisms intended for human consumption or bait purposes.	Yes
BIOL / ASBS	*Preservation of Biological Habitats of Special Significance* – Includes uses of water that support designated areas or habitats, such as established refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance, where the preservation or enhancement of natural resources requires special protection.	No
EST	*Estuarine Habitat* – Includes uses of water that support estuarine ecosystems, including but not limited to preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife.	Yes
WILD	*Wildlife Habitat* – Includes uses of water that support terrestrial ecosystems, including but not limited to preservation and enhancement of terrestrial habitats, vegetation, wildlife, or wildlife water and food sources.	Yes

Table 2-10. Beneficial Uses in Mission Bay		
Beneficial Use Code	**Beneficial Use Description**	**Existing Use Designated?**
RARE	*Rare, Threatened, or Endangered Species* – Includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered.	Yes
MAR	*Marine Habitat* – Includes uses of water that support marine ecosystems including, but not limited to, preservation or enhancement of estuarine habitats, vegetation such as kelp, fish, shellfish, or wildlife.	Yes
AQUA	*Aquaculture* – Includes uses of water for aquaculture or mariculture operations, including but not limited to propagation, cultivation, maintenance, or harvesting of aquatic plants and animals for human consumption or bait purposes.	No
MIGR	*Migration of Aquatic Organisms* – Includes uses of water that support habitats necessary for migration, acclimatization between fresh and saltwater, or other temporary activities by aquatic organisms, such as anadromous fish.	Yes
SPWN	*Spawning, Reproduction, and/or Early Development* – Includes uses of water that support high-quality habitats suitable for reproduction, early development, and sustenance of marine fish and/or cold freshwater fish.	Yes
WARM	*Warm Freshwater Habitat* – Includes uses of water that support warm water ecosystems, including but not limited to preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.	No
SHELL	*Shellfish Harvesting* – Includes uses of water that support habitats suitable for the collection of filter-feeding shellfish for human consumption, commercial, or sport purposes.	Yes

2.3.7.4 Groundwater

According to the RWQCB San Diego Water Quality Control Plan (RWQCB 2021), the project area is in the Miramar Hydrologic Subarea in the Miramar HA of the Peñasquitos HU. The Miramar HA is excepted from beneficial use for municipal supply and has a potential beneficial use for industrial supply. Groundwater data for the project area was not available; however, based on the elevation of the land portions of the project area and proximity to Fiesta Bay (adjacent), groundwater is anticipated to be relatively shallow (approximately 10 feet below ground surface). Groundwater is anticipated to flow to De Anza Cove and Fiesta Bay, south of the land portions of the project area (see Appendix I, Hydrology and Water Quality Technical Memorandum).

2.3.8 Noise

2.3.8.1 Fundamentals of Noise

The following is a brief discussion of fundamental noise concepts and terminology.

a. Sound, Noise, and Acoustics

Sound is a process that consists of three components: sound source, sound path, and sound receiver. All three components must be present for sound to exist. Without a source to produce sound, there is no sound. Similarly, without a medium to transmit sound pressure waves, there is no sound. Finally,

sound must be received; a hearing organ, sensor, or object must be present to perceive, register, or be affected by sound or noise. In most situations, there are many different sound sources, paths, and receptors rather than just one of each. Acoustics is the field of science that deals with the production, propagation, reception, effects, and control of sound. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired.

b. Sound Pressure Levels and Decibels

The amplitude of a sound determines its loudness. Loudness of sound increases with increasing amplitude. Sound pressure amplitude is measured in units of micronewtons per square meter, also called micropascals. One micropascal is approximately 100-billionth (0.00000000001) of normal atmospheric pressure. The pressure of a very loud sound may be 200 million micropascals, or 10 million times the pressure of the weakest audible sound. Because expressing sound levels in terms of micropascal would be very cumbersome, sound pressure levels in logarithmic units are used instead to describe the ratio of actual sound pressure to a reference pressure squared. These units are called bels. To provide a finer resolution, a bel is subdivided into 10 decibels (dB).

c. A-Weighted Decibels

Sound pressure level alone is not a reliable indicator of loudness. The frequency, or pitch, of a sound also has a substantial effect on how humans will respond. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness, or human response, is determined by the characteristics of the human ear. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter. The adjustments (referred to as a weighting network) are frequency-dependent.

The A-scale weighting network approximates the frequency response of the average young ear when listening to ordinary sounds. Noise levels are typically reported in terms of A-weighted sound levels. All absolute sound levels discussed in this PEIR are dBA; dB are used for changes in level.

d. Human Response to Changes in Noise Levels

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear can discern changes in sound levels of 1 dB when exposed to steady, single-frequency signals in the mid-frequency range. Outside such controlled conditions, the trained ear can detect changes of 2 dB in normal environmental noise. It is widely accepted that the average healthy ear, however, can barely perceive noise level changes of 3 dB. A change of 5 dB is readily perceptible, and a change of 10 dB is perceived as twice or half as loud. A doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a road) would result in a barely perceptible change in sound level).

e. Noise Descriptors

The equivalent sound level (L_{eq}) is also referred to as the time-averaged sound level. It is the equivalent steady-state sound level that in a stated period of time would contain the same acoustical energy as the time-varying sound level during the same time period. The 1-hour A-weighted equivalent sound

level, $L_{eq}(h)$, is the energy average of the A-weighted sound levels occurring during a 1-hour period and is the basis for the City's noise ordinance criteria.

People are generally more sensitive to and annoyed by noise occurring during the evening and nighttime hours. Thus, another noise descriptor used in community noise assessments—the community noise equivalent level (CNEL)—was introduced. The CNEL scale represents a time-weighted, 24-hour average noise level based on the A-weighted sound level. The CNEL accounts for the increased noise sensitivity during the evening hours (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.) by adding 5 dB and 10 dB, respectively, to the average sound levels occurring during the evening and nighttime hours.

f. Sound Propagation

Sound propagation (i.e., the passage of sound from a noise source to a receiver) is influenced by geometric spreading, ground absorption, atmospheric effects, and shielding by natural and/or built features.

Sound levels attenuate (or diminish) at a rate of approximately 6 dB per doubling of distance from an outdoor point source due to the geometric spreading of the sound waves. Atmospheric conditions such as humidity, temperature, and wind gradients can also temporarily either increase or decrease sound levels. In general, the greater the distance the receiver is from the source, the greater the potential for variation in sound levels due to atmospheric effects. Additional sound attenuation can result from built features, such as intervening walls and buildings, and from natural features, such as hills and dense woods.

2.3.8.2 Existing Noise Environment

Noise-sensitive receptors are land uses for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common noise-sensitive uses include residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, places of worship, childcare facilities, and certain types of passive recreational parks and open space. Existing noise sources in the project area include motor vehicle, aircraft, and stationary sources, as described below. Stationary noise sources include birds, distant conversations and yelling, and leaves rustling. The project area currently supports active recreation areas that generate noise.

a. Noise Measurements

Ambient noise levels at the project area and surrounding area were monitored on November 14, 2018. A brief description of where each noise measurement was conducted, as well as the measured time-average sound level and maximum sound level during the measurement interval (L_{max}), is summarized in Table 2-11, Short-Term Noise Measurement Data Summary. In addition, a long-term noise measurement (24 hours in duration) was conducted from November 14 through November 15, 2018, at the existing Campland location and designated as LT1. The summary of the LT1 noise measurement data is provided in Table 2-12, Long-Term Noise Measurement Data Summary. Detailed noise measurement data and locations are included as Appendix J, Noise Technical Memorandum.

Table 2-11. Short-Term Noise Measurement Data Summary				
Receptors	**Description**	**Noise Sources Observed**	**L_{eq} (dBA)**	**L_{max} (dBA)**
ST1	North of Pacific Beach Drive, adjacent to Campland, next to ravine	Traffic, birds, distant aircraft, distant conversations, yelling, distant traffic, rustling leaves	55.4	69
ST2	Bike/walking path south of Mission Bay Senior High School athletic fields	Distant traffic, birds, distant traffic, rustling leaves	43.2	54.2
ST3	Center of Campland, 50 feet west of security booth	Traffic, birds, distant aircraft, distant conversations, yelling, distant traffic, cars stopping at Campland gate, engine starts, helicopter	55.1	69.8
ST4	Northwest corner of Mission Bay Golf Course parking lot	Golf balls, birds, distant aircraft, distant conversations, yelling, distant traffic, rustling leaves	48	63.4
ST5	Southwest Corner of De Anza Cove Park parking lot	Distant traffic, birds, distant aircraft, distant conversations, yelling, distant traffic	49.2	51.6
ST6	Southern parking Lot of Mission Bay RV Resort	Industrial, birds, distant aircraft, distant conversations, yelling, distant dog barking, distant traffic, rustling leaves, construction noise, backup alarms	48.7	60.2
ST7	West of 4323 Mission Bay Drive San Diego, CA 92109	Traffic	70.6	77.5
ST8	Front lawn South of Bay Inn Apartments	Traffic	62.7	68.6

Source: Appendix J.
Note: Campland = Campland on the Bay; dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level (time-averaged sound level); L_{max} = maximum sound level during the measurement interval

Table 2-12. Long-Term Noise Measurement Data Summary				
Receptors	**Description**	**Weighted 24-Hour Noise Level (dBA CNEL)**	**Lowest Hourly Noise Level (dBA L_{eq})**	**Highest Hourly Noise Level (dBA L_{eq})**
LT1	Center of Campland, 50 feet west of security booth	57.8	42.9 @ 1:00–2:00 a.m.	58.8 @ 1:00–2:00 p.m.

Source: Appendix J.
Note: Campland = Campland on the Bay; CNEL = community noise equivalent level; dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level (time-averaged sound level)

b. Existing Vehicle Traffic Noise

The dominant noise source in the project area is vehicular traffic on freeways and local streets. Vehicular traffic noise is directly related to the traffic volume, speed, and mix of vehicle types. Vehicles traveling on I-5 dominate the existing ambient environment throughout the majority of the project area, further supplemented by main streets such as Grand Avenue and Pacific Beach Drive.

c. Existing Aircraft Noise

The nearest airports are the SDIA and Montgomery-Gibbs Executive Airport, each located approximately 4 miles from the project area. SDIA is located south of the project area, while Montgomery-Gibbs Executive Airport is located northeast of the project area. Flight paths for aircraft approach are occluded by terrain; however, distant aircraft noise was observed at five of the eight noise measuring locations (ST1, ST3, ST4, ST5, and ST6).

Aircraft noise is evaluated based on the noise contours developed by the San Diego County Regional Airport Authority and provided in the Airport Land Use Compatibility Plan for SDIA and the Montgomery-Gibbs Executive Airport. The project is just north of the SDIA's Airport Influence Area, approximately 2.7 miles outside the airport's 65 A-weighted decibel (dBA) CNEL noise contour (SDCRAA 2014) and just west of Montgomery-Gibbs Executive Airport's Airport Influence Area, and approximately 3.5 miles outside the airport's 65 dBA CNEL noise contour (SDCRAA 2010). The projected aircraft noise contours provided in the Airport Land Use Compatibility Plan are based on year 2030 forecasted noise exposure. Aircraft noise contours for 2035 are expected to be identical to those shown in the Airport Land Use Compatibility Plan, provided that no major changes occur with respect to aircraft types using SDIA, terminal capacities, or Federal Aviation Administration flight paths and patterns.

d. Existing Stationary Noise

Stationary sources of noise near the project area are characterized by specific land uses. For example, residential areas experience noise sources from typical residential building sound sources and activities such as landscaping, operating heating, ventilation, and air conditioning units, children playing, dogs barking, and/or operating entertainment systems with loudspeakers. As noted in the noise survey measurement summaries (Appendix J), stationary noise sources at the project area include birds, distant conversations and yelling, and leaves rustling. Further, the sound of golf balls was observed at ST4, located within the existing golf course. These existing stationary noise contributors are considered typical for a recreational/open space environment and are not generally considered significant sources of noise. Lastly, construction noise such as drilling and heavy machinery was observed at ST6, located within the existing De Anza Cove mobile home park. In cases of excessive noise levels or durations, the City's Municipal Code regulates noises resulting from these types of activities.

2.3.8.3 Vibration

Groundborne vibration is a small, rapidly fluctuating motion transmitted through the ground. The strength of groundborne vibration attenuates fairly rapidly over distance. Some soil types transmit vibration quite efficiently; other types (primarily sandy soils) do not. Several basic measurement units

are commonly used to describe the intensity of ground vibration. The descriptors used by the Federal Transit Administration are peak particle velocity, in units of inches per second, and vibration decibel (VdB). The velocity parameter (instead of acceleration or displacement) best correlates with human perception of vibration. Thus, the response of humans, buildings, and sensitive equipment to vibration is described in this section in terms of the root-mean square velocity level in VdB units relative to 1 micro-inch per second. As a point of reference, the average person can just barely perceive vibration velocity levels below 70 VdB (typically in the vertical direction). Typical background vibration levels are between 50 and 60 VdB, and the level for minor cosmetic damage to fragile buildings or blasting generally begins at 100 VdB.

2.3.9 Paleontological Resources

Fossils (paleontological resources) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (sedimentary rock formations) within which they were originally buried. For planning purposes, paleontological resources can be thought of as including not only actual fossil remains but also the localities where those fossils are collected and the geologic deposits/formations/rock units containing the localities (City of San Diego 2022b).

Paleontology is the science dealing with prehistoric plant and non-human animal life. Paleontological resources typically encompass the remains or traces of hard and resistant materials such as bones, teeth, or shells, although plant materials and occasionally less-resistant remains (e.g., tissue or feathers) can also be preserved. The formation of fossils typically involves the rapid burial of plant or animal remains and the formation of casts, molds, or impressions in the associated sediment (which subsequently becomes sedimentary bedrock). The potential for fossil remains in a given geologic formation can be predicted based on known fossil occurrences from similar (or correlated) geologic formations in other locations.

2.3.9.1 Paleontological Resource Sensitivity

The assessment of paleontological resource sensitivity for surficial and geologic units is based on the following designations derived from Deméré and Walsh (1993):

- **High Sensitivity.** These formations are known to contain paleontological localities with rare, well-preserved, critical fossil materials. Generally, high-sensitivity formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity.** Moderate sensitivity is assigned to formations known to contain paleontological localities and that are judged to have a strong, but often unproven, potential for producing unique fossil remains.
- **Low Sensitivity.** Low sensitivity is assigned to geologic or surficial formations/materials that, based on their relatively young age and/or high-energy depositional history, are judged unlikely to produce unique fossil remains.
- **Zero Sensitivity.** These formations consist of volcanic or plutonic igneous rocks with a molten origin (such as basalt or granite), or artificially and/or mechanically generated materials (such as fill and topsoil), and do not exhibit any potential for producing fossil remains.

As described in the Paleontological Resources Technical Memorandum (Appendix K), the majority of the project area is underlain by mapped deposits of artificial fill (Kennedy 1975; Kennedy and Tan 2008). Artificial fill has no paleontological sensitivity due to the human-made nature of these deposits (City of San Diego 2022b; Deméré and Walsh 1993; County of San Diego 2009). Any fossil material found in artificial fill is ex situ and would not be considered scientifically significant, or unique. There are a total of 72 fossil localities documented by the San Diego Natural History Museum within a 1-mile radius of the project area. Only 33 of these localities were discovered within the Bay Point Formation. Based on the records search results obtained from the San Diego Natural History Museum, the Pleistocene, or "Ice Age," Bay Point Formation underlies the western portion of the project area and is known to produce scientifically significant paleontological resources throughout the County and specifically in the project area (Localities SDNHM 3326 and 4008) (SDNHM 2018). Additional localities listed were from formations not anticipated to be encountered in the project area (e.g., San Diego Formation, Scripps Formation, and Ardath Shale).

2.3.9.2 Methodology

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular formations makes it possible to predict where fossils will or will not be encountered. This analysis is based on a review of the Geologic Map of the San Diego Quadrangle (Kennedy and Tan 2008) and the City's CEQA Significance Determination Thresholds (City of San Diego 2022b).

2.3.10 Transportation and Circulation

2.3.10.1 Roadways and Access

Five regionally and locally significant roadways traverse or provide access to the project area, described as follows:

- **I-5** is a north–south freeway immediately east of the project area. Access from I-5 is taken from the Grand Avenue–Garnet Avenue interchange to the north, and the Mission Bay Drive and Clairemont Drive interchange to the south.
- **De Anza Road** is a two-lane, north–south roadway that connects North Mission Bay Drive to the De Anza Cove recreational area. The roadway is approximately 550 feet long and has a southern terminus with a turnaround that connects to the multi-use path on the perimeter of Mission Bay Park. De Anza Road does not currently provide sidewalks or bicycle facilities. This roadway provides direct access to the Mission Bay RV Resort.
- **North Mission Bay Drive** is a two-lane road that extends from the entrance of the Mission Bay Boat and Ski Club on the west to the intersection of North Mission Bay Drive/Mission Bay Drive at the De Anza Cove Park eastern parking lot entrance on the east. This roadway bisects the De Anza Cove area and provides access to the majority of the uses within De Anza Cove (i.e., Mission Bay Boat and Ski Club, the Mission Bay Golf Course, and the De Anza Cove recreational area parking lot and Mission Bay RV Resort). Currently, no sidewalks are along the corridor, and bicyclists share the roadway as denoted by the existing sharrows painted on the pavement. The Mission Bay RV Resort driveway is accessed via North Mission Bay Drive at De Anza Road.

- **Mission Bay Drive** is a north–south roadway that parallels the I-5 freeway and connects the I-5 ramps north of Garnet Avenue to Clairemont Drive. In the project area, Mission Bay Drive is a four-lane divided roadway between the I-5 ramps north of Garnet Drive to North Mission Bay Drive. South of the North Mission Bay Drive intersection, the roadway narrows to an undivided two-lane roadway. The four-lane northern segment of Mission Bay Drive has a posted speed limit of 35 miles per hour and provides sidewalks on both sides of the roadway. On the southern segment of Mission Bay Drive, the posted speed limit is 30 miles per hour, and the road does not provide bicycle lanes or sidewalks.
- **Grand Avenue** is a four-lane, east–west roadway that connects Mission Bay Drive to the beach at Mission Boulevard. Grand Avenue borders the northern area of the site and provides access to the Mission Bay Athletic Area/Bob McEvoy Youth Fields and the Pacific Beach Tennis Club immediately east of Rose Creek. In the project area, Grand Avenue is divided with a raised median with sidewalks provided on both sides of the roadway. This roadway also provides access to the existing Rose Creek Trail, which runs along the eastern edge of Rose Creek.

2.3.10.2 Existing Trip Generation

The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and the De Anza Cove developed area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas. Since the majority of the land uses in the project area are passive land uses (i.e., open spaces, preserved, etc.), trip generation of the existing uses focused on the guest accommodation land use.

Existing campsite trip generation estimates were calculated based on existing counts at Campland and Mission Bay RV Resort sites, including the supporting land uses such as tennis courts, ballfields, volleyball field, playgrounds, and public beach access. Daily weekday and Saturday driveway counts were collected at the two campsite driveways in May and early June 2018. Based upon review of freeway traffic counts and understanding of the traffic patterns near the project area, the 2018 traffic counts are considered to be the best data available that is reflective of pre-Covid traffic conditions for both the project area and the surrounding area.

The existing Mission Bay RV Resort has limited on-site amenities compared to Campland. Due to the lack of amenities, campers at Mission Bay RV Resort are more susceptible to making external vehicular trips for goods and services than campers staying at Campland. The campsite rates derived from the respective campgrounds are reflective of this condition, since the campsite trip rates derived from the Mission Bay RV Resort are predominately higher than the Campland derived rates.

As shown, in Table 2-13, Existing Weekday Trip Generation Rates, and Table 2-14, Existing Saturday Trip Generation Rates, Saturday generated higher daily volumes compared to the weekday. Campland generated 40 percent and 99 percent higher volumes than Mission Bay RV Resort during the weekday and on Saturday, due to more occupied units.

Table 2-13. Existing Weekday Trip Generation Rates							
Site	Occupied Units[1]	Trips Generated			Trip Rate		
		Daily	AM Peak	PM Peak	Daily	AM Peak	PM Peak
Mission Bay RV Resort	138	1,495	60	135	10.83	0.43	0.98
Campland	242	2,088	104	188	8.63	0.43	0.78

Source: Appendix L.
Notes:
[1] Occupied units during the collection of driveway counts.

Table 2-14. Existing Saturday Trip Generation Rates					
Site	Occupied Units[1]	Trips Generated		Trip Rate	
		Daily	Midday Peak	Daily	Midday Peak
Mission Bay RV Resort	130	1,704	170	13.11	1.31
Campland	442	3,386	271	7.66	0.61

Source: Appendix L.
Notes:
[1] Occupied units during the collection of driveway counts.

Under the existing baseline condition, the Mission Bay RV Resort generated 10.83 trips per occupied unit during the weekday and 13.11 trips per occupied unit on Saturday. This site generated approximately 20 to 30 percent higher daily and peak hour trips on Saturday than on the weekday. Campland generated 8.63 trips per occupied units during the weekday, and 7.66 trips per occupied unit during Saturday.

Since both sites were not fully occupied at the time of the data collection, the trip generation rates documented in Table 2-13 and 2-14 were interpolated to determine the trip generation associated with the full occupancy of both sites, which typically happens during the summer and holidays. Table 2-15, Full Occupancy Weekday Maximum Capacity Trip Generation, and Table 2-16, Full Occupancy Saturday Maximum Capacity Trip Generation, display the estimated fully occupied trip generation for the two existing land uses.

Table 2-15. Full Occupancy Weekday Maximum Capacity Trip Generation													
Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				Trip Rate	Trips	Split	In	Out	Trip Rate	Trips	Split	In	Out
Mission Bay RV Resort	260 sites	10.83	2,816	0.43	112	4:6	45	67	0.98	255	6:4	153	102
Campland	556 sites	8.63	4,798	0.43	239	4:6	96	143	0.78	434	5:5	217	217
Total			**7,614**	**—**	**351**	**—**	**141**	**210**	**—**	**689**	**—**	**370**	**319**

Source: Appendix L.

Table 2-16. Full Occupancy Saturday Maximum Capacity Trip Generation								
Land Use	Units	Trip Rate	ADT	Midday Peak Hour				
				Trip Rate	Trips	Split	In	Out
Mission Bay RV Resort	260 sites	13.11	3,409	1.31	341	6:4	204	136
Campland	556 sites	7.66	4,259	0.61	339	6:4	203	136
Total			**7,668**		**680**		**407**	**272**

Source: Appendix L.

As shown above, at maximum capacity, the Campland site would generate 4,798 trips (approximately 113 trips per acres) on a weekday and 4,259 trips (approximately 100 trips per acres) on the weekend. Both sites combined would generate 7,614 trips on a weekday and 7,668 trips on the weekend.

2.3.10.3 Public Transportation

Transit service within the vicinity of Mission Bay Park is operated by the Metropolitan Transit System (MTS) and currently consists of bus service, with light-rail trolley service within the project vicinity; see Figure 2-6, Existing Public Transportation Routes and Stops, for the locations of MTS bus routes in the project area.

a. Bus

The project area is served by MTS Bus Routes 27 and 30. Route 27 serves Pacific Beach to Kearny Mesa. Route 30 serves Downtown to University Town Center/Veterans Affairs Medical Center. The MTS Rapid, Express, and Rapid Express do not serve the project area. Stops serving both directions of travel nearest De Anza Cove are along Garnet Avenue for Route 27 and along Grand Avenue for Route 30.

b. Light-Rail Transit

The Mid-Coast Trolley, which consists of the MTS Blue Line Trolley line extension from Downtown San Diego to the University community, is east of the project area. The Balboa Avenue Station is south of Balboa Avenue, 0.25 mile northeast of the project area, and the Clairemont Drive Station is south of Clairemont Drive, 0.75 mile southeast of the project area.

2.3.10.4 Heavy Rail

The LOSSAN rail corridor generally runs parallel to the eastern side of I-5, approximately 290 feet away from the project area. The LOSSAN rail corridor is 351 miles long, generally running along the coast from San Diego to San Luis Obispo. The LOSSAN rail corridor serves the Amtrak Pacific Surfliner, Amtrak Coast Starlight, North County Transit District COASTER, and the Metrolink. Although the Amtrak Pacific Surfliner and the North County Transit District COASTER include stops north and south of the project area, none are proximate to the project area (LOSSAN 2022).

2.3.10.5 Bicycle and Pedestrian Facilities

Site access to the De Anza Cove area for pedestrians and bicyclists is currently provided via driveways with road and/or sidewalk coverage and through Class I multi-use paths. Class I multi-use paths in the project area provide a separate right-of-way designated for the exclusive use of these active transportation users. Additionally, pedestrian facilities also consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections, while a combination of Class I multi-use paths, Class II bike lanes, and Class III bike route facilities provide connections for bicyclists; see Figure 2-7, Existing Bicycle Facilities. The Rose Creek Trail is a recreational pedestrian and bicycle connection from the Pacific Beach community that provides direct access into the De Anza Cove recreational area and is also classified as a Class I multi-use path. The Rose Creek Trail extends from De Anza Cove and parallels Rose Creek to the north and terminates near the Damon Street/Mission Bay Drive intersection, with a planned extension to the north in the future to connect with the improved Rose Creek Trail alongside I-5 leading to Rose Canyon.

Rose Creek Bikeway and Pedestrian Bridge, also known as the Mike Goth Memorial Bridge, connects the De Anza Cove area with the Pacific Beach community along Pacific Beach Drive, including key destinations such as Campland, Crown Point on Mission Bay, and the Pacific Ocean. Pedestrians access the Rose Creek Bikeway and Pedestrian Bridge from the west along smaller roadways such as Olney Street. In many cases, these local streets have sidewalk on only one side. No sidewalks are along Pacific Beach Drive from the Rose Creek Bikeway and Pedestrian Bridge up to the intersection of Crown Point Drive.

Along the perimeter of Mission Bay, a multi-use path is provided that serves pedestrians and bicyclists. The path connects the De Anza Cove recreational area to activity centers within Mission Bay Park, including Fiesta Island, picnic areas, restrooms, and other facilities. This path is heavily used throughout the year and attracts visitors from throughout the County. However, the path terminates at the parking lot located within the De Anza Cove recreational area. Currently, the path does not extend into the Mission Bay RV Resort and does not directly connect with the Rose Creek Trail or Rose Creek Bikeway and Pedestrian Bridge.

Class II bike lanes are generally found along larger circulation element roadways that serve Mission Bay Park and the Pacific Beach Community, such as Grand Avenue, Morena Boulevard, and Soledad Mountain Road. Class III bike routes provide additional connectivity between gaps in the Class I and Class II network, in both the Pacific Beach community and within Mission Bay Park. Class III bicycle routes are provided along North Mission Bay Drive, Mission Bay Drive, and sections of Garnet Avenue. These facilities are denoted by bike route signage and may include sharrows in the roadway.

Most intersections have one or more legs where pedestrian crossings are not permitted. One exception is the western intersection of Mission Bay Drive and North Mission Bay Drive (Study Intersection No. 7), where all four legs are stop controlled, thus permitting pedestrian crossings. Although pedestrians are technically allowed to cross at this intersection, especially since there is no signage prohibiting them from doing so, there are no sidewalk facilities provided at the intersection and its immediate vicinity.

2.3.11 Geology and Soils

The geologic units in the project area consist of fill (hydraulic fill dredged from Mission Bay and rubble fill from other construction sites) underlain by young alluvial and estuarine deposits. It is believed that the fill is underlain locally by young alluvium and young estuarine deposits, although they are not exposed in the project area.

2.3.11.1 Tectonics and Seismicity

San Diego is affected by the boundary between the North American and Pacific tectonic plates. The boundary, in Southern California, is characterized by a wide zone of predominantly northwest-striking, right-slip faults that span the Imperial Valley and Peninsular Ranges to the offshore California Continental Borderland Province (from the California continental slope to the coast). The San Clemente Fault Zone 60 miles west of San Diego and the San Andreas Fault Zone 70 miles east of San Diego define the plate boundary that affects the project area. The most active faults based on geodetic and seismic data are the San Andreas, San Jacinto, and Imperial Faults. These faults take up most of the plate motion. Smaller faults, however, are active enough to create damaging earthquakes and include the Elsinore and Newport-Inglewood-Rose Canyon Fault Zones, as well as the offshore Coronado Banks, San Diego Trough, and San Clemente Fault Zones.

The nearest active fault capable of causing ground rupture and strong earthquake shaking is the Rose Canyon Fault Zone approximately 350 feet east of the eastern edge of the project area. The Rose Canyon Fault Zone is the southernmost portion of the Newport-Inglewood Fault Zone, which extends from Long Beach north to the Descanso Fault, which is offshore of Baja California. A Magnitude 6.3 earthquake occurred on the Newport-Inglewood Fault in 1933 and caused serious damage in the Los Angeles area. No historical damaging earthquakes or historical fault ruptures have been documented on the Rose Canyon Fault. Fault trenching on the Rose Canyon Fault has shown that the fault has ruptured the ground surface several times in the last 10,000 years (Appendix M, Geotechnical and Geological Hazards Technical Memorandum). The previously mapped traces of the Rose Canyon Fault Zone are under the I-5 freeway or east of the freeway. While no previously mapped active faults are in the project area, a small portion of the Alquist-Priolo Earthquake Fault Zone extends west beyond East Mission Bay Drive into the project area. For planning purposes, it may be assumed that active faults may exist in the area within the Alquist-Priolo Zone.

2.3.11.2 Geologic Hazards

Liquefaction is a phenomenon where the strength and stiffness of a soil is reduced by earthquake or other rapid loading. The relatively rapid loss of the soil's shear strength during strong earthquake shaking results in temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. The City's San Diego Seismic Safety Study include maps of the City that identified risk zones. The most current San Diego Seismic Safety Study Geologic Hazard and Fault Maps were updated in 2008 and consist of 49 grid map sheets that cover the City. The grids are defined by the California State Plan coordinates. The majority of the project area is mapped as Geologic Category 31, High Potential, under "Liquefaction" (Appendix M). This category defines areas that have shallow groundwater, major drainages, and hydraulic fills, all of which have a high potential for liquefaction during ground-shaking

events such as earthquakes. A concealed fault and active Alquist-Priolo Earthquake Fault Zone mapped area borders the eastern side of the project area. Several other faults are just east of the project area and continue in a north–south general direction.

Subsidence typically occurs when extraction of fluids (water or oil) causes the reservoir rock to consolidate. Water extraction is minimal in the project area, and the geologic materials are well consolidated. Subsidence is not a hazard in the project area. Settlement of unconsolidated soil (fill or alluvial/estuarine sediments) may occur locally where new loads are imposed on previously uncompacted fill or unconsolidated alluvium (see Appendix M). Liquefaction, post-liquefaction settlement, and lateral spread would be taken into consideration during design of structures for human occupancy, such as the proposed guest accommodations, in accordance with the California Building Code.

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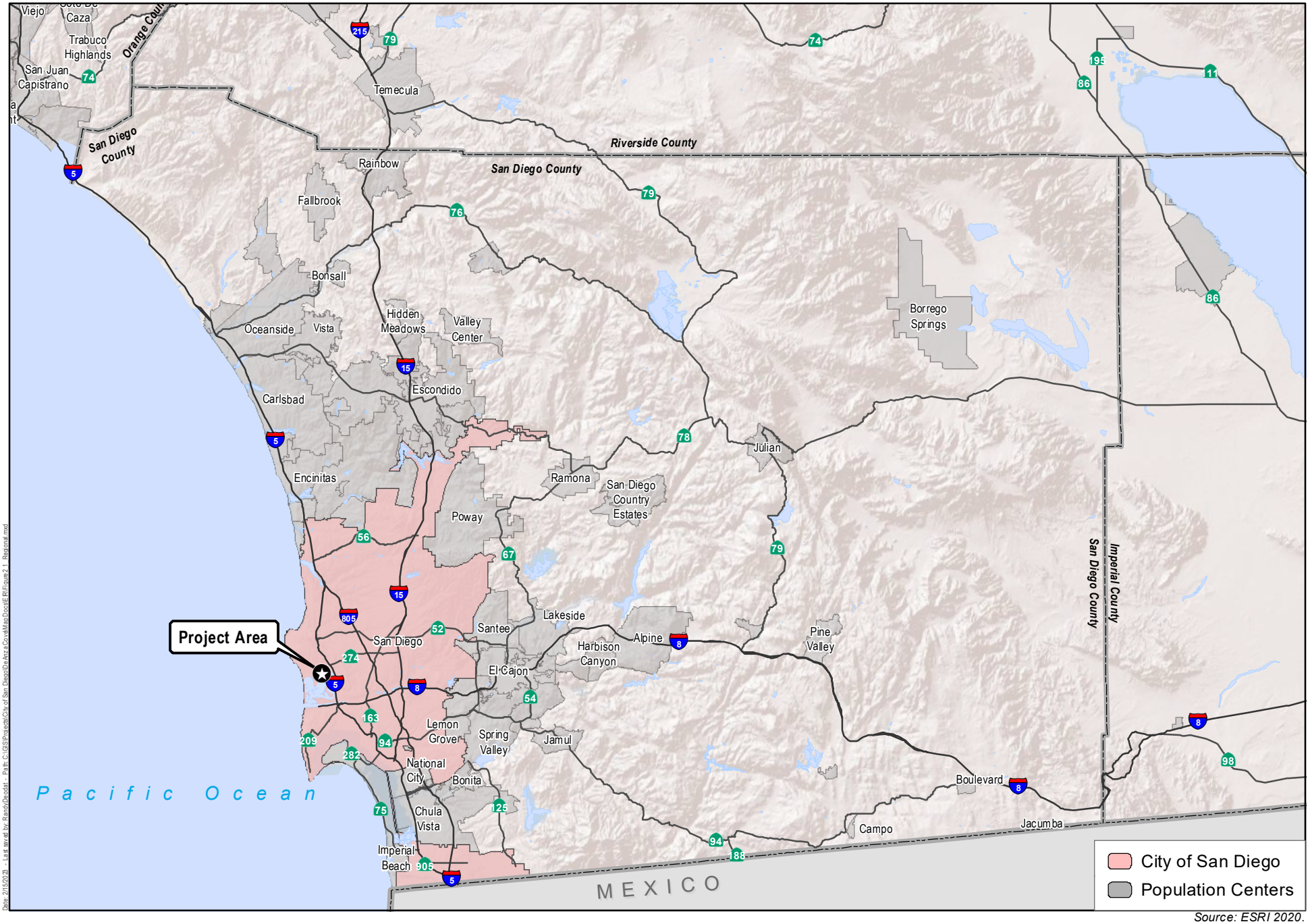

Source: ESRI 2020.

N

0 5 10

Miles

Figure 2-1

Regional Location

De Anza Natural Amendment to the Mission Bay Park Master Plan

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Source: SanGIS Imagery 2019.

N

0 500 1,000

Feet

Figure 2-2

Project Vicinity

De Anza Natural Amendment to the Mission Bay Park Master Plan

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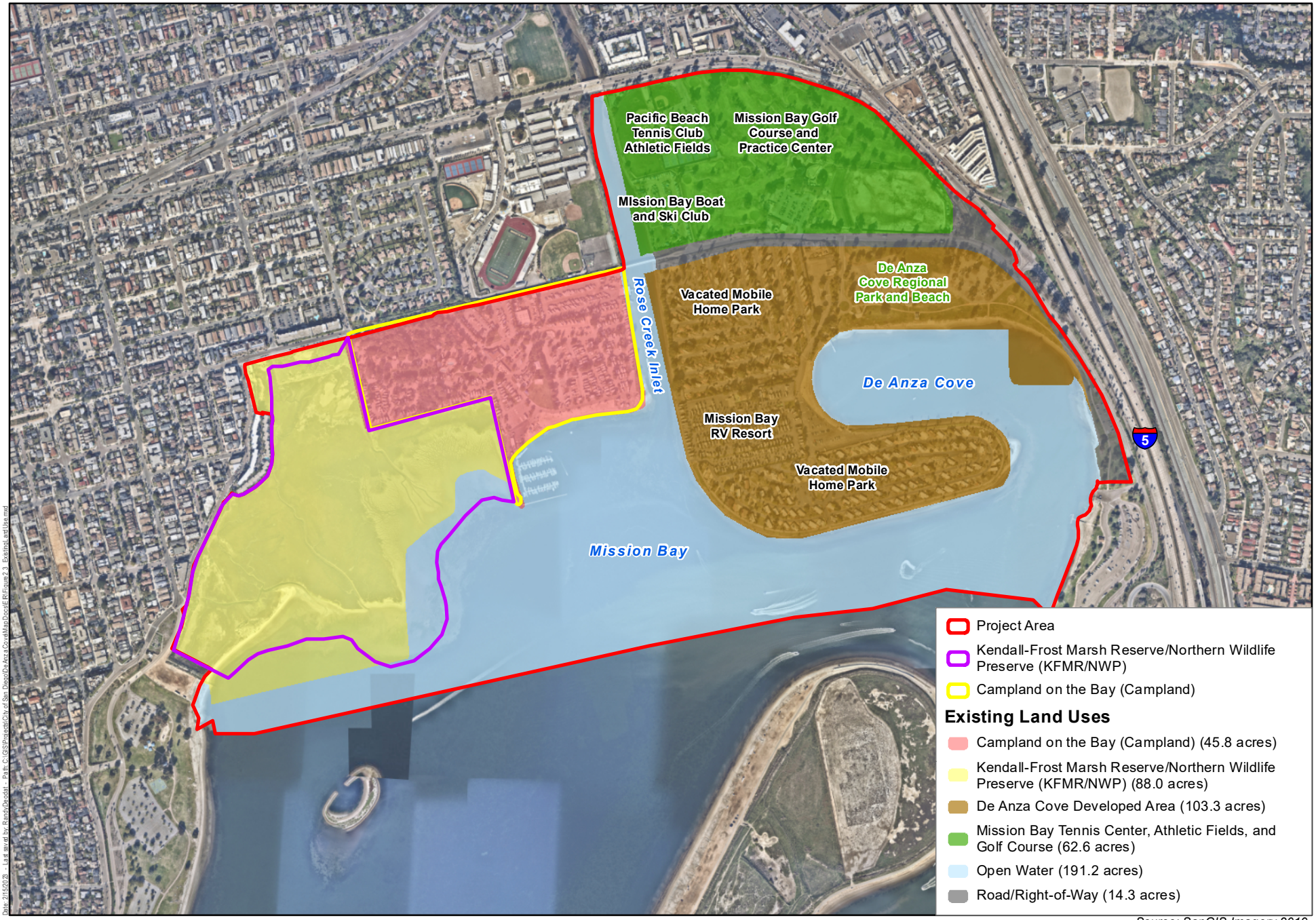

Source: SanGIS Imagery 2019.

N

0 500 1,000

Feet

Figure 2-3

Existing Land Uses

De Anza Natural Amendment to the Mission Bay Park Master Plan

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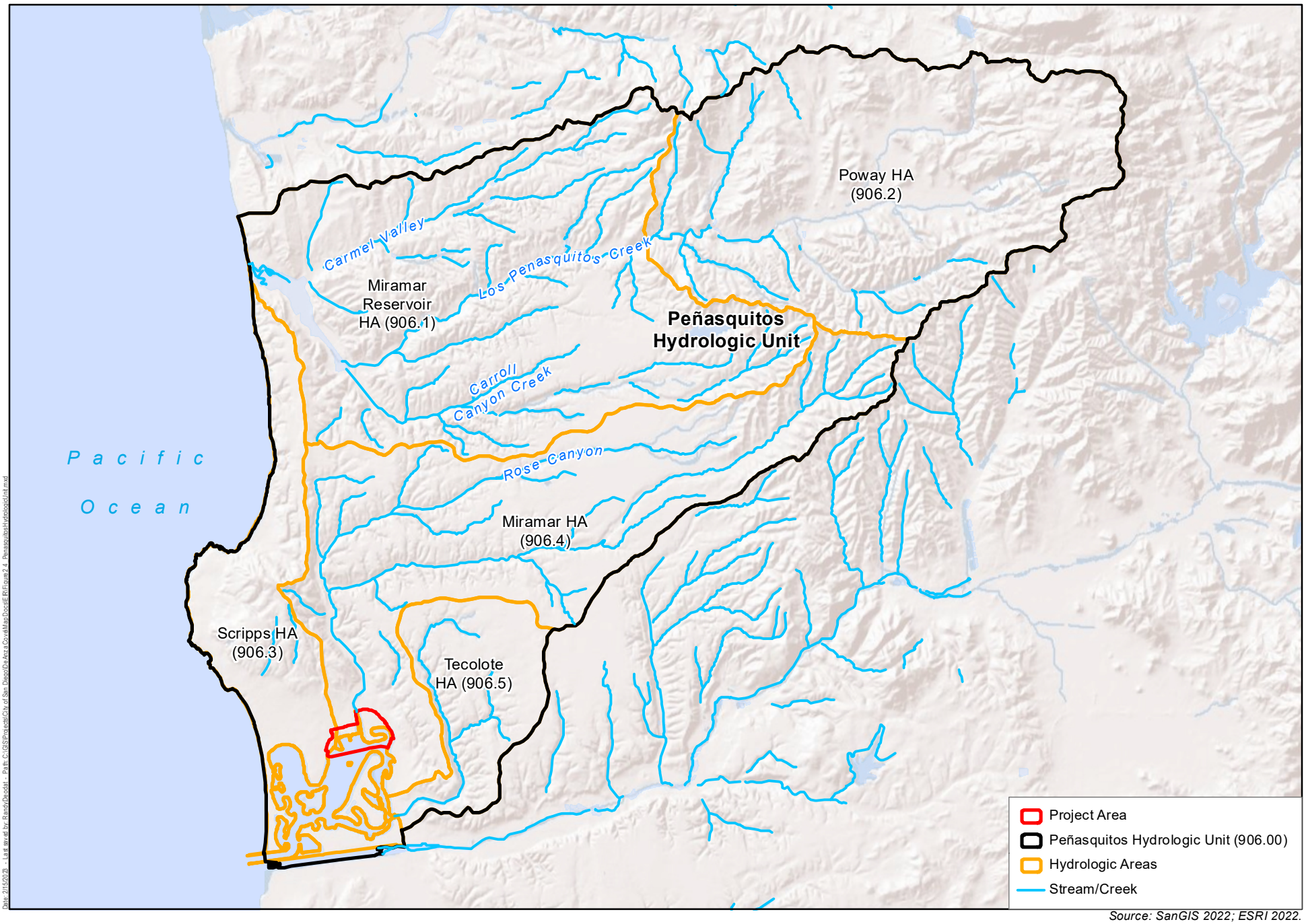

Source: SanGIS 2022; ESRI 2022.

N 0 1 2 Miles

Figure 2-4

Penasquitos Hydrologic Unit

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Source: FEMA 2022; SanGIS Imagery 2019.

Figure 2-5

Flood Zones

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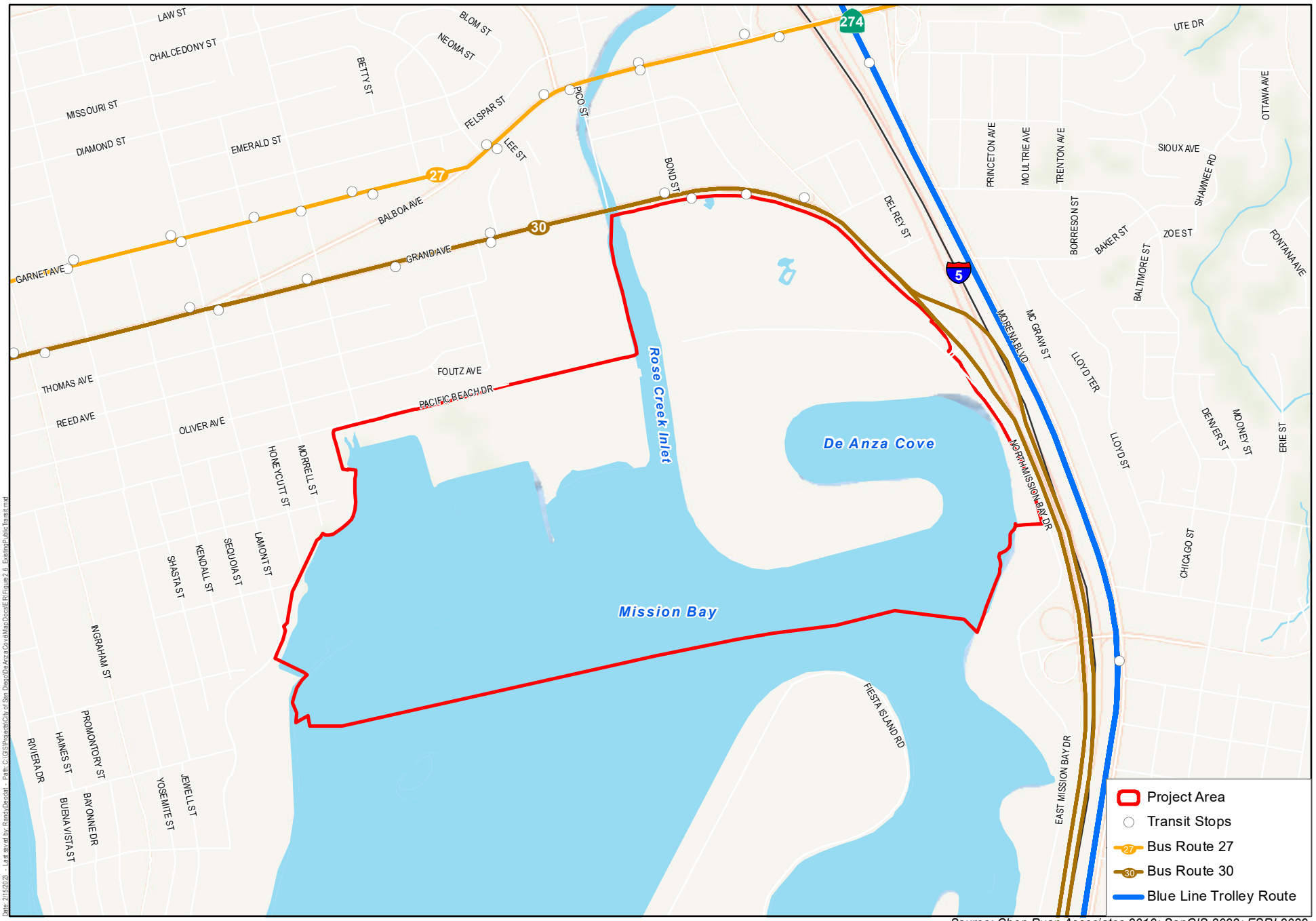

Source: Chen Ryan Associates 2019; SanGIS 2022; ESRI 2022.

N

0 600 1,200

Feet

Figure 2-6

Existing Public Transportation Routes and Stops

De Anza Natural Amendment to the Mission Bay Park Master Plan

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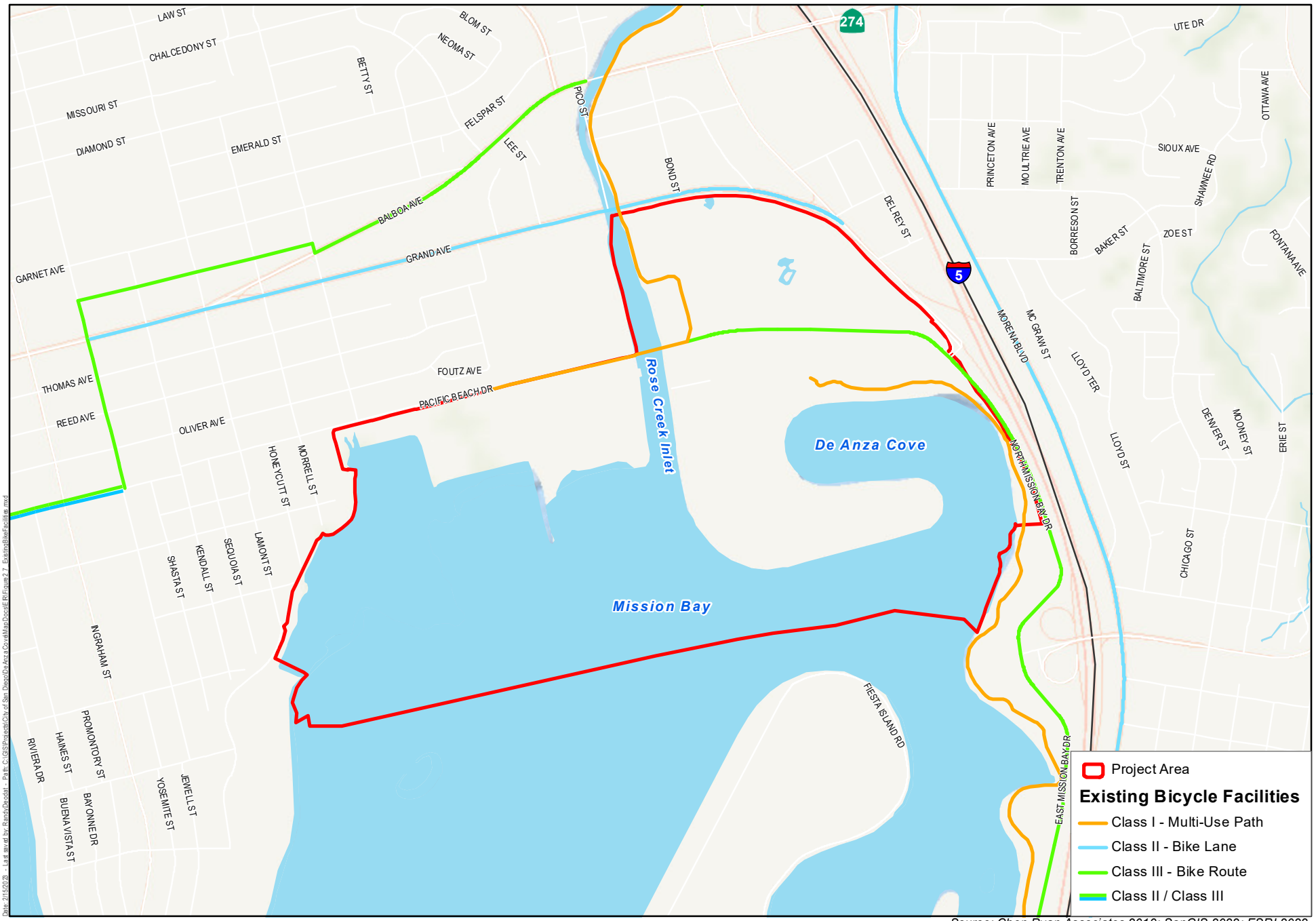

Source: Chen Ryan Associates 2019; SanGIS 2022; ESRI 2022.

N

0 600 1,200

Feet

Figure 2-7

Existing Bicycle Facilities

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3

Chapter 3.0
Project Description

3.1 Introduction

This chapter provides a description of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project), the environmental effects of which are evaluated in Chapters 5.0 through 8.0 of this Program Environmental Impact Report (PEIR). The project's location, history, purpose and need, and objectives are described below, followed by a description of the project's components, California Environmental Quality Act (CEQA) assumptions, and a summary of the discretionary actions that would be required. The project is an amendment to the Mission Bay Park Master Plan (MBPMP) related to De Anza Cove and associated discretionary actions described in this chapter.

3.1.1 Project Area

The project area is in the northeastern corner of Mission Bay Park in the City of San Diego (City) (see Figure 2-1, Regional Location). The project area consists of approximately 314 acres of land and includes approximately 191.2 acres of open water for a total of approximately 505.2 acres. The project area includes the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), Campland on the Bay (Campland), Pacific Beach Tennis Club athletic fields, Mission Bay Golf Course and Practice Center, and De Anza Cove area, including a vacated mobile home park and supporting infrastructure, Mission Bay RV Resort, public park, public beach, parking, and water areas (see Figure 2-2, Project Vicinity). The existing land uses and associated acreages are described in Table 3-1, Existing Land Use Acreages, and illustrated on Figure 2-3, Existing Land Uses.

Table 3-1. Existing Land Use Acreages	
Land Use	**Acres**
KFMR/NWP (land and water)	88
Campland on the Bay – Land	45.8
De Anza Cove Area – Land	103.3
Mission Bay Tennis Center, Athletic Fields, and Golf Course	62.6
Open Water	191.2
Roads and Right-of-Way	14.3
Total	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

The KFMR/NWP, as illustrated on Figure 2-3, is approximately 88 acres and bordered to the west and north by residential development, to the east by Campland, and to the south by Mission Bay. The KFMR/NWP mostly consists of vegetated wetland. Campland is approximately 45.8 acres and is directly east of KFMR/NWP. Campland is located on City-owned land and is currently leased and used as a privately operated RV and tent camping area. Condominiums are adjacent to Campland along the northern and western boundaries. The De Anza Cove area is approximately 103.3 acres and is directly east of Campland and Rose Creek and south of North Mission Bay Drive. The De Anza Cove area consists of an abandoned mobile home park and supporting infrastructure (e.g., roads, utilities, parking lots, and driveways), Mission Bay RV Resort (an existing campground for 260 RV sites with limited on-site amenities), Mission Bay Park area, and a public beach and parking area. North Mission Bay Drive bisects the De Anza Cove area and the Mission Bay Boat and Ski Club and recreational areas to the north. The recreational areas combined are approximately 62.6 acres and include the Mission Bay Tennis Center, Athletic Fields, and Golf Course (and their respective parking areas).

3.2 Project Objectives

In accordance with CEQA Guidelines, Section 15124(b), the following are the basic objectives of the project:

1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove.
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.

3.3 Project Components

3.3.1 Proposed Amendments

The proposed project is an amendment to the MBPMP to update existing language in the MBPMP and to add new language and recommendations pertaining to the project area to serve local and regional recreation needs while preserving and enhancing the natural resources of the De Anza Cove area. The project would expand the project area's natural habitat and improve water quality through the creation of additional wetlands while implementing nature-based solutions to protect the City against the risk of climate change in line with the City's Climate Resilient SD Plan. The project would enhance the existing regional parkland by providing a variety of uses, including low-cost visitor guest accommodations (recreational vehicles and other low-cost camping facilities), active and passive recreational opportunities to enhance public use of the area, and improvements to access to recreational uses. Finally, the project would recognize the history and ancestral homelands of the Iipay-Tipay Kumeyaay people, providing opportunities to partner and collaborate on the planning and restoration of the area. The project would implement the recommendations of the adopted MBPMP, as discussed below. The following discussion describes the components of the project, which are analyzed in this PEIR at a program level; see Figure 3-1, Site Plan, for proposed land uses and improvements.

3.3.1.1 Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area

The project includes enhancement and restoration within the existing KFMR/NWP and the expansion of wetlands currently occupied by Campland; see Figure 3-1. The project would follow the MBPMP recommendation of replacing the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats. The total area would be approximately 140.5 acres. The project would also maintain the existing University of California, San Diego, Biological Research Field Station facility located at the northwestern corner of the KFMR/NWP, which allows for study and interpretation of the local environment, focusing on the estuarine and bay habitats of Mission Bay. The project would also identify two alternative locations for a future environmental education and nature interpretation facility; in one of the alternative locations, it would be sited along Pacific Beach Drive within the KFMR/NWP. The facility would be above the marsh and buffered from the marsh.

3.3.1.2 De Anza Cove Area

The De Anza Cove area is south of North Mission Bay Drive and east of the Rose Creek inlet. The land uses proposed in this area include expanded marshland/habitat, low-cost visitor guest accommodations, regional parkland, open beach, boat facilities and clubhouse, multi-use paths, and upland (dune, sage) and buffer areas, which are further discussed below (Figure 3-1).

a. Expanded Marshland/Habitat

The expanded marshland/habitat area would be composed of high-, mid-, and low-salt marsh areas, mudflats, and subtidal areas, creating a natural interface with De Anza Cove and enhancing water quality in the bay. A key strategy is to locate wetlands as water quality improvement features

immediately adjacent to the existing storm drain outfalls in the existing eastern portion of De Anza Cove. The intent of the expanded wetlands is to provide a natural environment for recreation, mitigate for other disturbed environments, and benefit wildlife.

b. Low-Cost Visitor Guest Accommodations

The project would place low-cost visitor guest accommodation use on the eastern side of Rose Creek, buffered by upland vegetation. This land use would allocate approximately 48.5 acres for RVs, cabins, or other eco-friendly accommodations and associated open space and facilities consistent with camping accommodations.

c. Mission Bay Tennis Center, Athletic Fields, and Golf Course

The northern area currently contains active recreational facilities. Active recreation areas are meant to support land-based active recreational pursuits including but not limited to sand volleyball, pickleball, tennis, walking, cycling, and inline/roller skating. The project would incorporate a range of recreational uses with compatible user groups that would share the lighted sports fields. A facility with tennis and pickleball courts, which may include the Pacific Beach Tennis Club, could share infrastructure such as parking and a clubhouse with other active recreation and sports users, such as the Mission Bay Little League. A change or consolidation of golf facilities would potentially allow for more athletic fields and courts. Many existing recreational opportunities would be retained; however, the current site of the Mission Bay Boat and Ski Club would be replaced by enhancing and widening the Rose Creek inlet. A boat facility and shared clubhouse would be sited on the northern shore of De Anza Cove with approximately 1 acre of water use for non-motorized boats, an Interpretive Nature Center, and shared parking/service infrastructure.

The combination and layout of recreation and athletic facilities would be designed during the General Development Plan (GDP) process and at the time of redevelopment and implementation of project enhancements, and one or more GDPs could cover different areas in the project area.

d. Regional Parkland, Open Beach, Leased Areas, and Multi-Use Paths

Regional parkland supports activities such as picnicking, kiteflying, Frisbee games, informal sports, walking, jogging, children's play, bicycling, and skating. The existing regional parkland would be enhanced with recreational amenities and access to the multi-use path that connects the project area to points to the north, west, and east. A sandy beach area at the northern and western edges of De Anza Cove would be adjacent to the low-cost visitor guest accommodation use and the boating use. The beach area would be protected by buffers/safety measures that would delineate the edges/extents of the non-motorized boat use. The multi-use path would be a feature for users to view the marshes and have distant views of Mission Bay.

Within the regional parkland areas, park amenities could include the multi-use path, "open green" areas, one of the two alternative locations for a future environmental education and Interpretive Nature Center, children's play areas, surface parking, restrooms, and picnic shelters to support the recreational activities.

e. Upland (Dune, Sage) and Buffer Areas

The upland (dune, sage) and buffer areas would accommodate the proposed multi-use path with educational signage and, in some instances, mounded landforms. The mounded landforms would feature native coastal sage, dune, and other native plants that would be seen and experienced from the waterfront multi-use path. Within this area, passive recreation amenities such as overlooks, pathways, picnic areas, and interpretive signs could be accommodated. These areas would serve as a complement to the natural setting of the low-cost visitor guest accommodations and the beach areas on the cove, and the upland plantings would serve as a buffer to the wetland habitats.

f. Water Quality Design Features

Water quality design features are proposed along the edges of the active recreational areas. The proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality basins would be located to treat the entire project area in accordance with local and state requirements.

The water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base of the basin to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development areas to further reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

In addition to water quality detention basins, the project would incorporate site-specific best management practices (BMPs) to enhance water quality. These BMPs would include native plants for landscaping, which would not require fertilizers to reduce the potential for added nutrients into nearby water bodies, as well as efficient irrigation practices to reduce nutrient runoff. The project would incorporate storm drainage signage featuring a statement such as “NO DUMPING” or “DRAINS TO OCEAN” to discourage illegal dumping by visitors.

As a further water quality-enhancing feature, the edges of Rose Creek and along the “boot” of De Anza Cove would be revegetated with marsh, wetland, and upland native plants. In addition, “green” infrastructure such as constructed oyster beds would be implemented at shorelines where oyster colonization is feasible.

g. Surface Parking

Surface parking areas are proposed in the project area. Parking would be located in conjunction with the athletic areas and within the footprint of the low-cost visitor guest accommodation area. Additionally, surface parking lots accessible from North Mission Bay Drive would be provided to serve the proposed leases, athletic areas, and the regional parkland areas at De Anza Cove. Parking lots associated with the active recreation areas would be accessible from both North Mission Bay Drive and Grand Avenue. Overall, the project’s parking areas and interior parking accessways will be designed during the GDP process and at the time of redevelopment and implementation of project enhancements.

3.3.1.3 Circulation and Access

Circulation adjacent to and within the project area consists of vehicular, watercraft, and multi-use pathways for pedestrians and bicyclists.

a. Vehicular Circulation and Access

Vehicular access to the project area would be provided from Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation.

b. Watercraft Access

Watercraft access would be provided on De Anza Cove at the proposed Boat Facilities/Clubhouse land use and/or in association with the low-cost visitor guest accommodation lease. The existing boat ramp along the western bank of Rose Creek would be removed for shoreline "wilding" with nature-based designs and BMPs. Non-motorized personal watercraft would have access on De Anza Cove at the Boat Facilities/Clubhouse location identified on Figure 3-1, Site Plan). No changes to land use are proposed for the existing boat ramp that is southeast of the project area and is easily accessed from Interstate 5. The layout of the proposed boat facility could be designed during a GDP process for the greater De Anza Cove area or as a separate, more focused GDP process for the De Anza Cove boat facility.

3.3.1.4 Utilities and Infrastructure Improvements

Details of the utilities and infrastructure improvements will depend on the design details of the project, which are not known at this time. Utilities are currently located within the project area and connect to the City's infrastructure. More specifically, stormwater drains and pipes within the project area connect to the City's infrastructure to the north. Several stormwater drains are within parking areas and along access roadways. The project area is connected to the City's municipal sewer and water system via underground pipelines that connect the project area infrastructure to the City's system to the north. The existing pipelines at the De Anza Cove portion of the project area are proposed to remain in place and would be capped or used depending on future design details.

3.3.2 Proposed Land Uses

The MBPMP assigns land use designations throughout the MBPMP area, including the project area. The new land uses proposed for the project area are summarized in Table 3-2, Proposed Land Use Acreages, and described in further detail below. See Figure 3-1 for an illustration of the proposed land uses.

Table 3-2. Proposed Land Use Acreages	
Land Use	**Acres**
KFMR/NWP	86.8
Expanded Marshland/Habitat[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	37.4
Low-Cost Visitor Guest Accommodations	48.5
Regional Parkland	26.3
Boat Facilities/Clubhouse	2.6
Interpretive Nature Center (1 Location)[2]	—
Water Leases (2 Locations)[3]	2.1
Active Recreation	60.1
Open Water	95.9
Open Beach	5.5
Road[4]	1.6
Total	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes approximately 30.7 acres currently occupied by Campland and approximately 109.8 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future GDP. Two alternative locations are shown, allowing for the final location to be determined in the GDP process.

[3] Lease areas overlap with other land uses; therefore, acreages are not included in the total.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation, subject to future design and subsequent approvals.

3.4 CEQA Assumptions

The project is a plan amendment to the MBPMP. No development is currently being proposed; therefore, specific details regarding schedule, construction activities, and implementation of the project are not currently available. As described in Section 1.2.2, Purpose and Intended Use of the PEIR, GDPs will be developed over time and will provide precise engineering and construction plans for the recreational elements of the project. This PEIR programmatically addresses the environmental impacts of future implementation of the project using realistic, worst-case assumptions and establishes a mitigation strategy that would apply to future improvements. When the GDPs are available for all or portions of the project area, the City will evaluate these detailed plans against this PEIR and determine if the mitigation is adequate or if additional mitigation is warranted.

The proposed habitat area improvements would involve the conversion of the existing Campland property to natural habitat area, as anticipated in the MBPMP. This would involve the demolition of the developed area within Campland, including structures, pavement and utilities, and demolition of the adjacent boat docks to the south. It would also involve the backfill of portions of the bay located south of the proposed marsh and southwest of the proposed low-cost visitor guest accommodation area. Grading related to construction of the project is estimated to be balanced on site with approximately 873,886 cubic yards of overall cut and fill.

Under the project, the buildout of the De Anza Cove area would involve construction of the multi-use path, construction of low-cost visitor guest accommodations, uplands, wetlands, open beach, active

recreation facilities, and Mission Bay Park enhancements. Construction of the multi-use path would require paving, and construction of low-cost visitor guest accommodations would require demolition and removal of the existing mobile homes, and construction of low-cost visitor-serving RV sites, cabins, or other eco-friendly accommodations, landscaping, and restrooms. The site of the Mission Bay RV Resort would be cleared for the new guest accommodation facilities and the associated upland and open beach landscapes. The Mission Bay Park enhancements would include multiple components, such as beach enhancements, a boat facilities/clubhouse and boat docks, new recreation spaces, mounded and natural landforms, parking lots, and water quality detention basins and vegetated swales. Construction of the boat facility/clubhouse and boat docks would involve grading. Adjacent surface parking lots would serve associated land uses and would meet the requirements of the City's Land Development Code and 2019 Consultant's Guide for Park Design.

3.5 Discretionary Actions

Table 3-3, Potential Future Discretionary Actions Associated with Project Implementation, contains a non-inclusive list of future discretionary actions, approvals, and permits that would be required as part of the future implementation of the project and identifies agencies that would be responsible for granting the approvals and permits.

Table 3-3. Potential Future Discretionary Actions Associated with Project Implementation

Discretionary Action/Approval/Permit	Agency
Local	
Lease Agreement	City of San Diego
Park Use Permit	City of San Diego
Special Event Permit	City of San Diego
Temporary Use Permit	City of San Diego
Conditional Use Permit	City of San Diego
Site Development Permit for Infrastructure (water, sewer, and storm drain infrastructure, road improvements)	City of San Diego
State	
Local Coastal Program Amendment	California Coastal Commission
Section 401 Permit	State Water Resources Control Board
Section 1602/1603 Streambed Alteration Agreements	California Department of Fish and Wildlife
License Agreement	Board of Regents of the University of California
Federal	
Section 404 Permit	U.S. Army Corps of Engineers
Section 7 or 10(a) Permit	U.S. Fish and Wildlife Service

Source: City of San Diego 2023.

Figure 3-1

Site Plan

De Anza Natural Amendment to the Mission Bay Park Master Plan

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Chapter 4.0
Regulatory Framework

This chapter includes the regulatory framework applicable to each subject area included in this Program Environmental Impact Report (PEIR).

4.1 Land Use

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to land use for the De Anza Natural Amendment to the Mission Bay Park Master Plan (project).

4.1.1 Federal

a. Federal Aviation Regulations

The Federal Aviation Regulations are rules prescribed by the Federal Aviation Administration governing all aviation activities in the United States. The Federal Aviation Regulations comprise Title 14 of the Code of Federal Regulations. A variety of activities are regulated, such as aircraft design and maintenance, typical airline flights, pilot training activities, hot-air ballooning, lighter-than-air aircraft, human-made structure heights, obstruction lighting and marking, model rocket launches, commercial space operations, model aircraft operations, Unmanned Aircraft Systems, and kiteflying. The rules are designed to promote safe aviation, protecting pilots, flight attendants, passengers, and the general public from unnecessary risk.

4.1.2 State

a. Landscaping and Lighting Act

The Landscaping and Lighting Act of 1972 enables counties, cities, and special districts to acquire land for parks, recreation, and open space. A local government also may use the assessments to pay for improvements and maintenance to these areas. In addition to local government agencies (i.e., counties and cities), park and recreation facilities may be provided by other public agencies, such as

community service districts, park and recreation districts, and water districts. If so empowered, such an agency may acquire, develop, and operate recreation facilities for the general public.

b. California Coastal Act

The California Coastal Commission (CCC) was established by voter initiative in 1972 and was made permanent by the California Legislature through the adoption of the California Coastal Act (CCA) (California Public Resources Code, Section 30000 et seq.). The CCC, in partnership with coastal cities and counties, plans and regulates the use of land and water in the Coastal Zone. Under the CCA, cities and counties are responsible for preparing Local Coastal Programs (LCP) to obtain authority to issue Coastal Development Permits (CDPs) for projects within their jurisdiction. LCPs consist of land use plans, zoning ordinances, zoning maps, and other implementing actions that conform to the policies of the CCA. Until an agency has a fully certified LCP, the CCC is responsible for issuing CDPs.

4.1.3 Local

a. City of San Diego General Plan

The City of San Diego's (City's) General Plan was unanimously adopted by the San Diego City Council on March 10, 2008, with additional amendments approved in December 2010, January 2012, and August 2021. The City's General Plan builds on many of the goals and strategies of the former 1979 General Plan in addition to offering new policy direction in the areas of urban form, neighborhood character, historic preservation, public facilities, recreation, conservation, mobility, housing affordability, economic prosperity, and equitable development. It recognizes and explains the critical role of the community planning program as the vehicle to tailor the City of Villages strategy for each neighborhood. It also outlines the plan amendment process and other implementation strategies and considers the continued growth of the City beyond the year 2020. The City's General Plan contains 10 elements that provide a comprehensive "blueprint" for the City's growth over the next 20+ years (City of San Diego 2008). Most of the environmental goals relevant to the project are in the City's General Plan Land Use and Community Planning, Urban Design, Economic Prosperity, Conservation, Recreation, and Noise Elements, as described in the following sections.

Land Use and Community Planning Element

The purpose of this element is to guide future growth and development into a sustainable Citywide development pattern while maintaining or enhancing quality of life in the City's communities (City of San Diego 2015a). The Land Use and Community Planning Element addresses land use issues that apply to the City as a whole. The community planning program is the mechanism to refine Citywide policies, designate land uses, and make additional site-specific recommendations as needed. The element establishes the structure to respect the diversity of each community and includes policy direction to govern the preparation of community plans. It also provides policy direction in areas including zoning and policy consistency, the plan amendment process, coastal planning, airport land use compatibility planning, annexation policies, balanced communities, equitable development, and environmental justice.

Urban Design Element

"Urban design" describes the physical features that define the character or image of a street, neighborhood, community, or the City as a whole. Urban design provides the visual and sensory relationship between people and the built and natural environments. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework. Citywide urban design recommendations are provided in this element to ensure that the built environment continues to contribute to the qualities that distinguish the City as a unique living environment (City of San Diego 2008).

Economic Prosperity Element

The structure of the City's economy influences the City's physical development and determines the City's capacity to fund essential services. The purpose of this element is to improve economic prosperity by ensuring that the economy grows in ways that strengthen the City's industries, retain and create good jobs with self-sufficient wages, increase average income, and stimulate economic investment in the City's communities (City of San Diego 2008).

Conservation Element

The purpose of the Conservation Element is to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to the economy, and improve its quality of life (City of San Diego 2008). The Conservation Element contains policies to guide the conservation of the resources that are fundamental components of the City's environment, help define the City's identity, and are relied upon for continued economic prosperity.

Recreation Element

The City has over 38,930 acres of park and open space lands that offer a diverse range of recreational opportunities. The Recreation Element contains goals and policies to address the challenges the City faces to preserve, protect, develop, operate, maintain, and enhance public recreation opportunities and facilities throughout the City (City of San Diego 2021a). The purpose of the element is to help manage the increasing demand on existing/remaining usable park and recreation resources/facilities, develop open space lands and resource-based parks for population-based recreational purposes, ensure the distribution and access to parks is achieved equally Citywide recognizing the unique differences among communities, and achieve livable neighborhoods and communities.

Noise Element

The purpose of the Noise Element is to protect people living and working in the City from excessive noise. The Noise Element provides goals and policies to guide compatible land uses and incorporates noise attenuation measures for new uses to protect people living and working in the City from an excessive noise environment (City of San Diego 2008). It also establishes noise land use compatibility guidelines, as discussed in Section 5.8, Noise.

b. City of San Diego Mission Bay Park Master Plan

The project area is entirely within Mission Bay Park, which is a Community Planning Area in the City of San Diego. The Mission Bay Park Master Plan (MBPMP), which was adopted by the City of San Diego City Council in August 1994 and most recently amended in February 2021 with the Fiesta Island Amendment, serves as the guiding planning policy document for Mission Bay Park. The MBPMP was developed to manage the degraded water quality of the bay, plan for the new recreational demands of the future, and preserve and restore the environmental resources of the park, which had previously been exploited through historical development. The MBPMP outlines goals and objectives to support the sound management of the park's land and water resources while also balancing public recreation and the operation of economically successful commercial leisure enterprises. Goals and objectives of the MBPMP cover land use, water use, circulation and access, economics, environment, and aesthetics and design (City of San Diego 2021b).

Further, the MBPMP serves as the LCP for this area of the City. The CCA of 1976 established a Coastal Zone boundary and mandated that all jurisdictions within that boundary prepare an LCP. The entirety of Mission Bay Park is located within the Coastal Zone. Consequently, the MBPMP is responsible for including planning and development standards to protect and preserve the state's coastal resources. The MBPMP has incorporated the coastal issues that have been identified by and for the community and has developed policies and recommendations in various elements of the plan (City of San Diego 2021b). Project consistency with applicable goals and policies of the MBPMP is presented in Appendix B, Land Use Consistency Tables.

c. City of San Diego Land Development Code Regulations

The City's Land Development Code (LDC) consists of Chapters 11, 12, 13, 14, and a portion of Chapter 15, of the City's Municipal Code. The LDC contains the City's planning, zoning, subdivision, and building regulations that regulate how land is to be developed within the City. The LDC sets forth the procedures used in the application of land use regulations, the types of review of development, and the regulations that apply to the use and development of land in the City. The intent of these procedures and regulations is to facilitate fair and effective decision-making and to encourage public participation (City of San Diego 2021b).

General Development Regulations

The City established and adopted submittal requirements, review procedures, and standards and guidelines for development as manuals to supplement the LDC. These support documents are known collectively as the Land Development manual (LDM). Chapter 14 of the LDC includes general development regulations, supplemental development regulations, building regulations, and electrical/plumbing/mechanical regulations that govern all aspects of project development. The grading, landscaping, parking, signage, fencing, and storage requirements are all in Chapter 14, General Regulations. Chapter 14 provides procedures to review land use plans, zoning actions, maps, and permit applications. Map and permit reviews are divided into two major categories: development review and construction review. A proposed map or permit may require either type or both types of review as specified. Development review is the review of conceptual or schematic plans. Development review is required when conditions must be applied to a map or permit or when adjustments or

exceptions from regulations are proposed. Construction review is review of final or construction plans for compliance with regulations of the LDC.

Environmentally Sensitive Lands Regulations

The Environmentally Sensitive Lands (ESL) regulations in Chapter 14, Article 3, Division 1 (Section 143.0101), of the City's LDC (City of San Diego 2021c) are intended to ensure that development, including but not limited to coastal development in the Coastal Overlay Zone (COZ), occurs in a manner that protects the overall quality of specific natural resources, as defined in the City's LDC, and is consistent with sound resource conservation principles and the rights of private property owners. These regulations and accompanying guidelines for biological resources, steep hillsides, Special Flood Hazard Areas, and coastal bluffs and beaches are intended to serve as standards for the determination of impacts and mitigation under the California Environmental Quality Act (CEQA) Statute and Guidelines and the CCA. Development on a site containing ESL requires a Site Development Permit in accordance with LDC Section 126.0502.

Historical Resources Regulations

Refer to Section 4.6.3, Local, for a discussion of the Historical Resources regulations.

d. San Diego County Multiple Species Conservation Program

Refer to Section 4.3.3, Local, for a discussion of the Multiple Species Conservation Program (MSCP).

e. San Diego County Regional Airport Authority Airport Land Use Compatibility Plan

The San Diego County Regional Airport Authority, which serves as the state-designated Airport Land Use Commission for San Diego County (County), adopts Airport Land Use Compatibility Plans (ALUCPs) for all airports in the San Diego region. The ALUCPs serve as a tool for use by the Airport Land Use Commission in conducting reviews of proposed land use in the areas surrounding airports and assists the City, as an affected local land use jurisdiction, in the preparation or amendment of land use plans and ordinances, including the City's General Plan. Currently, four adopted ALUCPs—San Diego International Airport, Marine Corps Air Station Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport—are in place within the City's land use jurisdiction.

f. San Diego Association of Governments San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) is the federally designated Metropolitan Planning Organization (MPO) for the San Diego region. SANDAG serves as a forum for public decision-making on regional issues such as growth, transportation, and land use in the County and consists of representatives from each of the County's local jurisdictions. The San Diego Forward: The Regional Plan (2021 Regional Plan) was adopted by the SANDAG Board of Directors on December 10, 2021. The 2021 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education,

healthcare, and other community resources. The plan is the result of years of planning, data analysis, and community engagement to reimagine the San Diego region with a transformative transportation system, a sustainable pattern of growth and development, and innovative demand and management strategies (SANDAG 2021).

g. City of San Diego Climate Action Plan

Refer to Section 4.4.3, Local, for a discussion of the City's Climate Action Plan (CAP) and CAP Consistency Checklist.

h. City of San Diego Biology Guidelines

Refer to Section 4.3.3, Local, for a discussion of the Biology Guidelines.

i. City of San Diego Pacific Beach Community Plan and Local Coastal Program Land Use Plan

The vision of the Pacific Beach Community Plan and LCP Land Use Plan (Pacific Beach CP/LCP) is to reconcile the community as a visitor destination and residential community, and the Pacific Beach CP/LCP includes goals, policies, and recommended actions to support this vision. The Pacific Beach CP/LCP aims to minimize traffic through the increased provision of convenient and affordable public transit, and concentrate new development along and around Garnet Avenue and Mission Boulevard, the community's primary commercial areas and transit corridors.

j. City of San Diego Balboa Avenue Station Area Specific Plan

In December 2021, the City approved the Balboa Avenue Station Area Specific Plan in the communities of Pacific Beach and Clairemont Mesa, north of the project area. The Balboa Avenue Station Area Specific Plan is a comprehensive planning document that provides a policy framework to guide transit-oriented public and private development and multimodal improvements adjacent to the Balboa Avenue Trolley Station consistent with the City's General Plan City of Villages strategy.

4.2 Air Quality and Odor

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to air quality and odor for the project. The section describes applicable plans, policies, and regulations of federal, state, or regional agencies with jurisdiction over the City.

4.2.1 Federal

a. Federal Clean Air Act/National Ambient Air Quality Standards

The federal Clean Air Act (CAA), passed in 1970 and last amended in 1990, was enacted for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity, forming the basis for the national air pollution control effort. The U.S. Environmental Protection Agency (USEPA) is responsible for implementing most aspects of the federal

CAA, including the setting of National Ambient Air Quality Standards (NAAQS) for major air pollutants, hazardous air pollutant standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric ozone (O_3) protection, and enforcement provisions.

NAAQS are established by the USEPA for "criteria pollutants" under the CAA, which are ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), coarse and fine particulate matter (PM_{10} and $PM_{2.5}$), and lead. The NAAQS are presented in Table 4-1, Ambient Federal Air Quality Standards.

Table 4-1. Ambient Federal Air Quality Standards

Pollutant	Averaging Time	National Standards[a]	
		Primary[b,c]	Secondary[b,d]
O_3	1 hour	—	Same as Primary Standard[e]
	8 hours	0.070 ppm (137 mg/m^3)[e]	
NO_2[f]	1 hour	0.100 ppm (188 mg/m^3)	Same as Primary Standard
	Annual Arithmetic Mean	0.053 ppm (100 mg/m^3)	
CO	1 hour	35 ppm (40 mg/m^3)	None
	8 hours	9 ppm (10 mg/m^3)	
SO_2[g]	1 hour	0.075 ppm (196 mg/m^3)	—
	3 hours	—	0.5 ppm (1,300 mg/m^3)
	24 hours	0.14 ppm (for certain areas)[g]	—
	Annual	0.030 ppm (for certain areas)[g]	—
PM_{10}	24 hours	150 mg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	—	
$PM_{2.5}$[h]	24 hours	35 mg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12.0 mg/m^3	15.0 mg/m^3
Lead[i,k]	30-day Average	—	—
	Calendar Quarter	1.5 mg/m^3 (for certain areas)[k]	Same as Primary Standard
	Rolling 3-Month Average	0.15 mg/m^3	

Source: USEPA 2022.

Notes:

[a] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once per year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than 1. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[b] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25° Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[c] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[d] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[e] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[f] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[g] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated non-attainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[h] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[i] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

The NAAQS describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal CAA requires the USEPA to reassess the NAAQS at least every 5 years to determine whether adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the NAAQS must prepare a State Implementation Plan (SIP) that demonstrates how those areas will attain the standards within mandated time frames.

b. National Emission Standards for Hazardous Air Pollutants

The 1977 federal CAA Amendments required the USEPA to identify National Emission Standards for Hazardous Air Pollutants to protect public health and welfare. Hazardous air pollutants (HAPs) include certain volatile organic compounds (VOCs), pesticides, herbicides, and radionuclides that present a tangible hazard based on scientific studies of exposure to humans and other mammals. Under the 1990 federal CAA Amendments, which expanded the control program for HAPs, 187 substances and chemical families were identified as HAPs.

4.2.2 State

a. California Clean Air Act/California Ambient Air Quality Standards

The California CAA was adopted in 1988 and establishes the state's air quality goals, planning mechanisms, regulatory strategies, and standards of progress. Under the California CAA, the task of air quality management and regulation has been legislatively granted to California Air Resources Board (CARB), with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and County levels. CARB is responsible for ensuring the implementation of the California CAA, responding to the federal CAA, and regulating emissions from motor vehicles and consumer products. Pursuant to the authority granted to CARB, it has established California Ambient Air Quality Standards (CAAQS), which are generally more restrictive than the NAAQS. In addition to the federal criteria for pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 4-2, Ambient California Air Quality Standards).

Table 4-2. Ambient California Air Quality Standards

Pollutant	Averaging Time	California Standards[a] Concentration[b]
O_3	1 hour	0.09 ppm (180 mg/m^3)
	8 hours	0.070 ppm (137 mg/m^3)
NO_2[c]	1 hour	0.18 ppm (339 mg/m^3)
	Annual Arithmetic Mean	0.030 ppm (57 mg/m^3)
CO	1 hour	20 ppm (23 mg/m^3)
	8 hours	9.0 ppm (10 mg/m^3)
SO_2[d]	1 hour	0.25 ppm (655 mg/m^3)
	3 hours	—
	24 hours	0.04 ppm (105 mg/m^3)
	Annual	—
PM_{10}[e]	24 hours	50 mg/m^3
	Annual Arithmetic Mean	20 mg/m^3
$PM_{2.5}$[e]	24 hours	—
	Annual Arithmetic Mean	12 mg/m^3
Lead[f,g]	30-day Average	1.5 mg/m^3
	Calendar Quarter	—
	Rolling 3-Month Average	—
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m^3)
Vinyl chloride[f]	24 hours	0.01 ppm (26 µg/m^3)
Sulfates	24- hours	25 µg/m^3
Visibility-reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PT)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to the number of particles when the relative humidity is less than 70%

Source: CARB 2016.

Notes: µg/m^3 = micrograms per cubic meter; CO = carbon monoxide; mg/m^3 = milligrams per cubic meter; NO_2 = nitrogen dioxide; O_3 = ozone; PM_{10} = particulate matter with an aerodynamic diameter less than or equal to 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns; ppm = parts per million by volume; SO_2 = sulfur dioxide

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter (PM_{10}, $PM_{2.5}$), and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[b] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based on a reference temperature of 25° Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[c] To attain the national 1-hour standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

[d] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. To attain the national 1-hour standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated non-attainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[e] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 were also retained. The form of the annual primary and secondary standards is the annual mean averaged over 3 years.

[f] CARB has identified lead and vinyl chloride as toxic air contaminants (TACs) with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[g] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

b. Toxic Air Contaminants

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California.

California regulates TACs primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588). The Tanner Act sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. Once a TAC is identified, CARB then adopts an airborne toxics control measure for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate the best available control technology for toxics to minimize emissions. None of the TACs identified by CARB have a safe threshold.

Of particular concern statewide are diesel particulate matter emissions. Diesel particulate matter was established as a TAC in 1998 and is estimated to represent the majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of the health effects of diesel exhaust a complex scientific issue. The overall strategy for achieving these reductions is found in the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (CARB 2000). A stated goal of the plan is to reduce the statewide cancer risk arising from exposure to diesel particulate matter by 85 percent by 2020.

c. State Implementation Plan

The SIP is a collection of documents that set forth a state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. All of the items included in the SIP are listed in Code of Federal Regulations, Title 40, Section 52.220.

The San Diego County Air Pollution Control District (SDAPCD) is responsible for preparing and implementing the portion of the SIP applicable to the San Diego Air Basin (SDAB). The 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County is described below. The SDAPCD adopts rules, regulations, and programs to attain state and federal air quality standards and appropriates money (including permit fees) to achieve these objectives. CARB adopted the 2020 SIP Update on November 19, 2020.

4.2.3 Local

a. San Diego County Air Pollution Control District

While CARB is responsible for the regulation of mobile emission sources within the state, local air quality management districts and air pollution control districts are responsible for enforcing standards and regulating stationary sources.

In the County, O_3 and particulate matter are the pollutants of main concern since exceedances of CAAQS for those pollutants are experienced here in most years. For this reason, the SDAB has been designated as a non-attainment area for the state PM_{10}, $PM_{2.5}$, and O_3 standards. The SDAB is also a federal O_3 non-attainment area for the 8-hour O_3 standard.

Regional Air Quality Strategy

The SDAPCD and SANDAG are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The County Regional Air Quality Strategy (RAQS) was initially adopted on June 30, 1992, and is updated on a triennial basis, most recently in 2016 (SDAPCD 2016). A 2022 RAQS Revision is currently underway. The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The RAQS relies on information from CARB and SANDAG, including mobile and area source emissions, and information regarding projected growth in the cities and the County, to project future emissions and determine the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the cities and the County as part of the development of their General Plans.

In December 2016, the SDAPCD revised the RAQS for the County. Since 2007, the San Diego region reduced daily VOC emissions and NO_x emissions by 3.9 percent and 7 percent, respectively; the SDAPCD expects to continue reductions through 2035. These reductions were achieved through implementation of six VOC control measures and three NO_x control measures adopted in the SDAPCD's 2009 RAQS. In addition, the SDAPCD is considering additional measures, including three VOC measures and four control measures to reduce 0.3 daily tons of VOC and 1.2 daily tons of NO_x, provided they are found to be feasible regionwide. Further, the SDAPCD has implemented nine incentive-based programs, worked with SANDAG to implement regional transportation control measures, and reaffirmed the state emission offset repeal.

Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County

The SDAPCD's attainment plan for San Diego County (Ozone Plan) demonstrates how the region will comply with the federal O_3 standard. As documented in the 2020 Ozone Plan, the County has a likely chance of obtaining attainment due to the transition to low-emissions cars and stricter new source review rules and continuing the requirement of general conformity for military growth and San Diego International Airport. The County will also continue emission control measures: ongoing implementation of existing regulations in O_3 precursor reduction to stationary and area-wide sources,

subsequent inspections of facilities and sources, and the adoption of laws requiring best available retrofit control technology for control of emissions.

General Rules and Regulations

As stated earlier, the SDAPCD is responsible for planning, implementing, and enforcing federal and state ambient standards in the SDAB. The following rules and regulations apply to all sources in the jurisdiction of the SDAPCD:

- **SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976).
- **SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as trackout and carry-out onto paved roads beyond a project site (SDAPCD 2009).
- **SDAPCD Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015).
- **SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants – New Source Review.** Requires sources of TAC emissions subject to SDAPCD permit to limit emissions of TACs and meet specific control strategies (SDAPCD 2018).

b. City of San Diego Municipal Code

The City's Municipal Code addresses air quality and odor impacts in Chapter 14, Article 2, Division 7, Section 142.0710, Air Contaminant Regulations, which states that "air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located" (City of San Diego 2010).

4.3 Biological Resources

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to biological resources for the project.

4.3.1 Federal

a. Federal Endangered Species Act

The federal Endangered Species Act (FESA) of 1973 (16 USC 1531 et seq.), as amended, is administered by the U.S. Fish and Wildlife Service (USFWS), National Oceanic and Atmospheric Administration, and National Marine Fisheries Service. This legislation is intended to provide a means to conserve the ecosystems upon which endangered and threatened species depend and provide programs for the

conservation of those species, thus preventing extinction of plants and wildlife. Under provisions of Section 9(a)(1)(B) of FESA, it is unlawful to "take" any listed species. "Take" is defined in Section 3(19) of FESA as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Additionally, Section 7(a)(2) of FESA directs federal agencies to consult with the USFWS for any actions that "may affect" listed species.

FESA provides for designation of critical habitat, defined in Section 3(5)(A) as specific areas within the geographical range occupied by a species where physical or biological features "essential to the conservation of the species" are found and "which may require special management considerations or protection." Critical habitat may also include areas outside the current geographical area occupied by the species that are nonetheless "essential for the conservation of the species."

b. Migratory Bird Treaty Act

The Migratory Bird Treaty Act prohibits the take of any migratory bird or any part, nest, or eggs of any such bird. Under the Migratory Bird Treaty Act, "take" is defined as pursue, hunt, shoot, wound, kill trap, capture, or collect, or any attempt to carry out these activities (16 USC 703 et seq.). The number of bird species covered by the Migratory Bird Treaty Act is extensive; the species are listed in Code of Federal Regulations, Title 50, Part 10.13. The regulatory definition of "migratory bird" is broad and includes any mutation or hybrid of a listed species and also includes any part, egg, or nest of such birds (50 CFR 10.12). The Migratory Bird Treaty Act, which is enforced by the USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. The applicable regulations prohibit the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations (50 CFR 21.11). Additionally, Executive Order (EO) 13186, Responsibilities of Federal Agencies to Protect Migratory Birds, requires that any project with federal involvement address impacts of federal actions on migratory birds with the purpose of promoting conservation of migratory bird populations (66 FR 3853–3856). The EO requires federal agencies to work with the USFWS to develop a memorandum of understanding. The USFWS reviews actions that might affect these species.

c. U.S. Army Corps of Engineers

Pursuant to Section 404 of the Clean Water Act (CWA), the U.S. Army Corps of Engineers (USACE) regulates the discharge of dredged and/or fill material into "waters of the United States." The term "wetlands" (a subset of waters) is defined in Code of Federal Regulations, Title 33, Part 328.3(b), as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas." In the absence of wetlands, the limits of USACE jurisdiction in non-tidal waters, such as intermittent streams, extend to the "ordinary high water mark," which is defined in Code of Federal Regulations, Title 33, Part 328.3(e).

Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 320–330) lists criteria for consideration when evaluating wetland functions and values. These include wildlife habitat (spawning,

nesting, rearing, and resting), food chain productivity, water quality, groundwater recharge, and wetland areas for storm and flood water storage.

d. Rivers and Harbors Act, Sections 9 and 10

Section 9 of the Rivers and Harbors Act prohibits the construction of any bridge, dam, dike, or causeway over or in navigable waterways of the U.S. without congressional approval. Administration of Section 9 has been delegated to the U.S. Coast Guard. Consultation with the U.S. Coast Guard may be necessary to determine if a Section 9 Permit would be required under the Rivers and Harbors Act.

Section 10 of the Rivers and Harbors Act requires that permits be obtained from the USACE in navigable waters of the United States for all structures, such as riprap, and activities, such as dredging. Navigable waters are defined as those subject to the ebb and flow of the tide and susceptible to use in their natural condition or by reasonable improvements as means of interstate transport or foreign commerce. USACE grants or denies Section 10 Permits based on the effects on navigation. Most projects covered under this act are also covered under CWA Section 404.

e. Marine Mammal Protection Act

All marine mammals are afforded protection under the Marine Mammal Protection Act (16 USC 1361 et. seq.). With limited exception, the Marine Mammal Protection Act makes it illegal to "take" a marine mammal without authorization granted by the National Marine Fisheries Service. "Take" is defined as harassing, hunting, capturing, or killing, or attempting to harass, hunt, capture, or kill any marine mammal. "Harassment" is defined as pursuit, torment, or annoyance, which has the potential to injure a marine mammal in the wild or has the potential to disturb a marine mammal in the wild by causing disruption of behavioral patterns, including but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering. Take authorization must be granted by the National Marine Fisheries Service.

f. Coastal Zone Management Act

The Coastal Zone Management Act of 1972 (16 USC 1451–1464, Chapter 33) is administered by the National Oceanic and Atmospheric Administration's Office of Ocean and Resource Management and was established as a national policy to preserve, protect, develop, and where possible, enhance or restore the Coastal Zone in the United States. The federal consistency provision, Section 307 of the Coastal Zone Management Act, encourages states to join the Coastal Zone Management Program, which takes a comprehensive approach to coastal resource management by balancing the competing and/or conflicting demands of coastal resource use, economic development, and conservation and allows states to issue the applicable permits. California has a federally approved Coastal Zone Management Program, and the Coastal Zone Management Act is administered by the CCC. Therefore, the Coastal Zone Management Program and permit requirements are discussed further under CCA in Section 4.3.2, State.

4.3.2 State

a. California Environmental Quality Act

CEQA requires identification of a project's potentially significant impacts on biological resources and feasible mitigation measures and alternatives that could avoid or reduce significant impacts. CEQA Guidelines, Section 15380(b)(1), defines endangered animals or plants as species or subspecies whose "survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, overexploitation, predation, competition, disease, or other factors" (14 CCR 15000 et seq.). A rare animal or plant is defined in CEQA Guidelines, Section 15380(b)(2), as a species that, although not presently threatened with extinction, exists "in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or . . . the species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered 'threatened' as that term is used in the federal Endangered Species Act." Additionally, an animal or plant may be presumed to be endangered, rare, or threatened if it meets the criteria for listing, as defined further in CEQA Guidelines, Section 15380(c). CEQA also requires identification of a project's potentially significant impacts on riparian habitats (such as wetlands, bays, estuaries, and marshes) and other sensitive natural communities, including habitats occupied by endangered, rare, and threatened species.

b. California Coastal Act and California Coastal Commission Wetlands Regulation

The CCC, in partnership with coastal cities and counties, plans and regulates the use of land and water in the Coastal Zone. Under the CCA, cities and counties are responsible for preparing LCPs in order to obtain authority to issue CDPs for projects within their jurisdiction. LCPs consist of land use plans, zoning ordinances, zoning maps, and other implementing actions that conform to the policies of the CCA. Until an agency has a fully certified LCP, the CCC is responsible for issuing CDPs.

Under CCA Section 30107.5, environmentally sensitive habitat areas are areas within the Coastal Zone that are "designated based on the presence of rare habitats or areas that support populations of rare, sensitive, or especially valuable species or habitats." In addition, the CCC regulates impacts to coastal wetlands defined in Section 30121 of the CCA as, "lands within the Coastal Zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens." The CCA requires that most development avoids and buffers coastal wetland resources, including limiting the filling of wetlands to certain allowable uses, in accordance with Sections 301231 and 30233.

c. California Endangered Species Act

The California Department of Fish and Wildlife (CDFW) administers the California Endangered Species Act (CESA) (California Fish and Game Code, Section 2050 et seq.), which prohibits the "take" of plant and animal species designated by the California Fish and Game Commission as endangered or threatened in the State of California. Under CESA Section 86, take is defined as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA Section 2053 stipulates that state agencies may not approve projects that will "jeopardize the continued existence of any endangered species or

threatened species or result in the destruction or adverse modification of habitat essential to the continued existence of those species, if there are reasonable and prudent alternatives available consistent with conserving the species or its habitat which would prevent jeopardy."

CESA Sections 2080–2085 address the taking of threatened, endangered, or candidate species by stating that "no person shall import into this state, export out of this state, or take, possess, purchase, or sell within this state, any species, or any part or product thereof, that the Commission determines to be an endangered species or a threatened species, or attempt any of those acts, except as otherwise provided in this chapter, the Native Plant Protection Act (Fish and Game Code, Sections 1900–1913), or the California Desert Native Plants Act (Food and Agricultural Code, Section 80001)."

d. California Fish and Game Code

According to Sections 3511 and 4700 of the California Fish and Game Code, which regulate birds and mammals, respectively, a "fully protected" species may not be taken or possessed without a permit from the California Fish and Game Commission, and "incidental takes" of these species are not authorized.

According to Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds of prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by this code or any regulation adopted pursuant thereto.

For the purposes of these state regulations, the CDFW currently defines an active nest as one that is under construction or in use and includes existing nests that are being modified. For example, if a hawk is adding to or maintaining an existing stick nest in a transmission tower, then it would be considered to be active and covered under these California Fish and Game Code sections.

The Native Plant Protection Act of 1977 (California Fish and Game Code, Section 1900 et seq.) gives the CDFW authority to designate state endangered, threatened, and rare plants and provides specific protection measures for identified populations.

e. California Department of Fish and Wildlife Wetland Regulation

The CDFW exercises jurisdiction over waters of the state under Sections 1600–1616 of the California Fish and Game Code based on the definition of regulated activity provided in Section 1602 of the California Fish and Game Code and the definition of a stream provided in Title 14, Section 1.72, of the California Code of Regulations.

Section 1602 of the California Fish and Game Code states that "an entity may not substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake" without notifying the CDFW. Title 14, Section 1.72, of the California Code of Regulations defines a stream as "a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation." This definition includes a broad range of

vegetation communities, including some that do not contain wetland species but are in a riparian landscape position. CDFW jurisdiction typically extends to the outer limit of riparian vegetation or to the top of bank of an unvegetated stream channel.

Under Section 1603 of the California Fish and Game Code, upon notification, the CDFW "shall determine whether the activity may substantially adversely affect an existing fish and wildlife resource." If such a determination is made, the CDFW reaches an agreement with the notifying entity (a Streambed Alteration Agreement) that includes measures to protect the resources that the CDFW has determined the activity may substantially adversely affect.

f. State and Regional Water Quality Control Board Wetland Regulation

See Section 4.7.2(b) for discussion.

g. California Natural Communities Conservation Planning Act of 1991

The CDFW's Natural Community Conservation Planning (NCCP) program takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. The NCCP program began in 1991 as a cooperative effort to protect habitats and species. It is broader in its orientation and objectives than the California and federal Endangered Species Acts, as these laws are designed to identify and protect individual species that have already declined in numbers significantly. An NCCP Plan identifies and provides for the regional protection of plants, animals, and their habitats while allowing compatible and appropriate economic activity. Working with landowners, environmental organizations, and other interested parties, a local agency oversees the numerous activities that compose the development of an NCCP Plan. The CDFW and the USFWS provide the necessary support, direction, and guidance to NCCP program participants.

4.3.3 Local

a. San Diego County Multiple Species Conservation Program

The City is a participant in the regional County of San Diego MSCP, a cooperative federal, state, and local environmental conservation program aimed at preserving San Diego's unique native plants and animals (covered species). The MSCP's boundaries extend over multiple jurisdictions and environments, including regional watersheds and migratory wildlife corridors. The MSCP protects the region's diverse native plant and animal species, including those that are threatened and endangered. The MSCP also provides provisions and regulations that accommodate future growth and streamline building regulations while protecting natural resources in the region.

Multiple Species Conservation Program Subarea Plan

The City's Subarea Plan was adopted in 1997 and encompasses 206,124 acres within the regional MSCP Study Area (City of San Diego 1997). The Subarea Plan provides a Multi-Habitat Planning Area (MHPA) where preserve planning is focused and permanent conservation of habitat lands will be accomplished and includes a process for the issuance of permits under the California Natural Communities Conservation Planning Act of 1991 and the federal and California Endangered Species Act (as discussed in Section 4.3.2, State). The City's Subarea Plan is characterized by predominantly

urban land uses, including associated parks and open space. The City's Subarea Plan separates the City into several geographic subunits. The project is located within the Urban Area, which encompasses the central coastal and central eastern portions of San Diego, including Point Loma and other Urban Habitat Areas. More specifically, the Urban Habitat Areas include existing designated open space such as Mission Bay; Tecolote Canyon; Marian Bear Memorial Park; Rose Canyon; San Diego River; the southern slopes along Mission Valley, Carroll, and Rattlesnake Canyons; Florida Canyon; Chollas Creek; and a variety of smaller canyon systems. The majority of these lands consist of canyons with native habitats in relative proximity to other MHPA areas providing habitat. These areas contribute in some form to the MHPA, either by providing habitat for native species to continue to reproduce and find new territories or by providing necessary shelter and forage for migrating species (mostly birds).

Multi-Habitat Planning Area

The City MHPA identifies a "hard line" boundary developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. Sections of the project would be within and adjacent to MHPA boundaries (Figure 5.3-1, Impacts to Biological Resources – Proposed Project). The MHPA identifies biological core resource areas and corridors targeted for conservation, in which only limited development may occur. The MHPA is considered an urban preserve that is constrained by existing or approved development and is composed of habitat linkages connecting several large core areas of habitat. The criteria used to define core and linkage areas involve maintaining ecosystem function and processes, including large animal movement. Each core area is connected to other core areas or to habitat areas outside the MSCP either through common boundaries or through linkages. Core areas have multiple connections to help ensure that the balance in the ecosystem will be maintained. Critical habitat linkages between core areas are conserved in a functional manner with a minimum of 75 percent of the habitat within identified linkages conserved (City of San Diego 1997).

Multi-Habitat Planning Area Land Use Adjacency Guidelines

Land uses adjacent to the MHPA will be managed to ensure minimal impacts to the MHPA. Consideration will be given to good planning principles in relation to adjacent land uses. The MHPA Land Use Adjacency Guidelines will be incorporated into applicable permits during the development review phase of a project. These guidelines address the issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development.

b. City of San Diego Environmentally Sensitive Lands Regulations

Refer to Section 4.1.3, Local, for a discussion of the ESL regulations.

c. City of San Diego Biology Guidelines

The City developed the Biology Guidelines in the LDM "to aid in the implementation and interpretation of the ESL regulations, San Diego LDC, Chapter 14, Article 3, Division 1, Section 143.0101 et seq., and the Open Space Residential (OR-1-2) Zone, Chapter 13, Article 3, Division 2, Section 131.0201 et seq" (City of San Diego 2021c). The guidelines also provide standards for the determination of impact and

mitigation under CEQA and the CCA. Sensitive biological resources, as defined by the ESL regulations, include lands within the MHPA, as well as other lands outside the MHPA that contain wetlands; vegetation communities classifiable as Tier I, II, IIIA, or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species.

The City's definition of wetlands is broader than the definition applied by the USACE. The City uses the criteria listed in Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 320–330) to apply an appropriate buffer around wetlands that serves to protect the functions and values of the wetland. Guidelines that supplement the development regulation requirements described in this section are provided in the Biology Guidelines (City of San Diego 2021c). The project area includes a 50-foot buffer from the proposed impact area, and resources in the San Diego River floodplain are within this buffer that would be considered wetlands within the COZ and, therefore, would require adherence to the COZ wetland buffer regulations (City of San Diego 2021c). According to the Biology Guidelines, a wetland buffer is an area surrounding a wetland that helps protect the function and value of the adjacent wetland by reducing physical disturbance, provides a transition zone where one habitat phases into another, and acts to slow flood waters for flood and erosion control, sediment filtration, water purification, and groundwater recharge (City of San Diego 2021c). Within the COZ, wetland buffers should be a minimum of 100 feet wide (as determined on a case-by-case basis in consultation with CDFW, USFWS, and the USACE) adjacent to a wetland. The width of the buffer is determined by factors such as type and size of development, sensitivity of the wetland resource to edge effects, topography, and the need for upland transition (City of San Diego 2021c). The City's Municipal Code also ranks upland habitat values by rarity and sensitivity. The most sensitive habitats are Tier I and the least sensitive are Tier IV. The varying mitigation ratios and requirements that mitigation be either in-tier or in-kind are based on the sensitivity of the habitat being affected.

d. City of San Diego Mission Bay Park Natural Resource Management Plan

In 1988, the City undertook a comprehensive review of Mission Bay Park's biological resources in anticipation of the need for a baywide natural resource protection plan and the identification of mitigation opportunities and constraints to secure approvals for park improvements requiring environmental mitigation. This led to the preparation of the Mission Bay Park Natural Resource Management Plan (NRMP) (City of San Diego 1990). The primary purpose of the NRMP is to allow the continued improvement and maintenance of Mission Bay Park and to ensure viable productivity of the park and its various natural resources (City of San Diego 2021b). Major goals of the NRMP include recognition of the rich and varied biological resources of Mission Bay Park, designating environmentally sensitive habitats, and establishing development requirements to protect sensitive resources. The NRMP also provides for agreements between the City and resource agencies regarding the maintenance and responsibilities for regional natural resources such as the California least tern (*Sterna antillarum browni*) and eelgrass. Conformance with the NRMP development guidelines for the California least tern are addressed in Section 5.3, Biological Resources.

4.4 Greenhouse Gas Emissions

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to greenhouse gas (GHG) emissions for the project. The section describes applicable plans, policies, and regulations of federal, state, or regional agencies with jurisdiction over the City.

4.4.1 Federal

a. Federal Clean Air Act

See Section 4.2.1, Federal, for discussion of the federal CAA.

Massachusetts vs. U.S. Environmental Protection Agency

On April 2, 2007, in Massachusetts v. USEPA, the U.S. Supreme Court directed the USEPA administrator to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. In making these decisions, the USEPA administrator is required to follow the language of Section 202(a) of the CAA. On December 7, 2009, the administrator signed a final rule with two distinct findings regarding GHGs under Section 202(a) of the CAA:

- The administrator found that elevated concentrations of GHGs—carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride (SF_6)—in the atmosphere threaten the public health and welfare of current and future generations. This is referred to as the "endangerment finding."
- The administrator further found the combined emissions of GHGs—CO_2, CH_4, N_2O, and hydrofluorocarbons—from new motor vehicles and new motor vehicle engines contribute to the GHG air pollution that endangers public health and welfare. This is referred to as the "cause or contribute finding."

These two findings were necessary to establish the foundation for regulation of GHGs from new motor vehicles as air pollutants under the CAA.

b. Federal Vehicle Standards

In response to the U.S. Supreme Court ruling discussed above, the Bush Administration issued EO 13432 in 2007 directing the USEPA, the U.S. Department of Transportation, and the U.S. Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The standards have continued to be updated to include additional standards for future vehicle model years regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. Most recently, in December 2021, the USEPA finalized revised national GHG emissions standards for passenger cars and light trucks for model years 2023–2026.

c. Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, the USEPA published the Final Mandatory Greenhouse Gas Reporting Rule (Reporting Rule) in the Federal Register (74 FR 56260–56373). The Reporting Rule requires reporting of GHG data and other relevant information from fossil fuel and industrial GHG suppliers, vehicle and engine manufacturers, and all facilities that would emit 25,000 metric tons of carbon dioxide equivalent (MT CO_2e) or more per year. Facility owners are required to submit an annual report with detailed calculations of facility GHG emissions on March 31 for emissions from the previous calendar year. The Reporting Rule also mandates recordkeeping and administrative requirements to enable the USEPA to verify the annual GHG emissions reports.

4.4.2 State

a. Executive Order S-3-05 (Statewide GHG Emission Targets)

EO S-3-05 (June 2005) established California's GHG emissions reduction targets and assigned responsibilities among the state agencies for implementing the EO and reporting on progress toward the targets. EO S-3-05 established the following targets:

- By 2010, reduce GHG emissions to 2000 levels.
- By 2020, reduce GHG emissions to 1990 levels.
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

The emissions targets established in EO-S-3-05 have been codified and updated as described below.

b. Assembly Bill 32 (California Global Warming Solutions Act)

In furtherance of the goals established in EO S-3-05, the legislature enacted AB 32 (Núñez and Pavley), the California Global Warming Solutions Act of 2006 (September 27, 2006). AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, representing a reduction of approximately 15 percent below emissions expected under a "business-as-usual" scenario.

CARB has been assigned responsibility for carrying out and developing the programs and requirements necessary to achieve the goals of AB 32. Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 also authorized CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism adopted.

In 2007, CARB approved a statewide limit on the GHG emissions level for year 2020 consistent with the determined 1990 baseline (427 million metric tons [MMT] CO_2e). CARB's adoption of this limit is in accordance with the California Health and Safety Code, Section 38550. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory reporting of GHGs for the large facilities that account for 94 percent of GHG emissions from industrial and commercial stationary sources in California.

c. Climate Change Scoping Plan

As directed by AB 32, CARB adopted the Scoping Plan in December 2008, in accordance with California Health and Safety Code, Section 38561, and included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures (CARB 2008). The 2017 Scoping Plan was adopted in November 2017. The 2017 Scoping Plan Update incorporates the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32. It identifies how the state can reach the 2030 climate target and substantially advance toward our 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels (CARB 2017). Most recently, the 2022 Scoping

Plan was adopted in December 2022. The 2022 Scoping Plan Update assesses progress toward the statutory 2030 target and identifies a path to achieving carbon neutrality by 2045 (CARB 2022).

d. Senate Bill 32 and Assembly Bill 197

SB 32 and AB 197 (enacted in 2016) are companion bills that set a new statewide GHG reduction target, make changes to CARB's membership, increase legislative oversight of CARB's climate change-based activities, and expand dissemination of GHG and other air quality-related emissions data to enhance transparency and accountability. SB 32 codified the 2030 emissions reduction goal by requiring CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies, consisting of at least three members of the Senate and three members of the Assembly, to provide ongoing oversight over implementation of the state's climate policies. AB 197 also added two members of the legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and TACs from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

e. Assembly Bill 1279

AB 1279, the California Climate Crisis Act, enacted in September 2022, updates the goals of AB 32. The bill established a statewide goal to achieve net-zero GHG emissions by 2045 and achieve and maintain net-negative GHG emissions thereafter. Additionally, the bill established a specific target for statewide anthropogenic GHG emissions to be reduced to at least 85 percent below the 1990 levels by 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California, as specified. The bill also requires CARB to submit an annual progress report.

f. California Energy Code

Title 24 of the California Code of Regulations was established in 1978 and serves to enhance and regulate California's building standards. While not initially promulgated to reduce GHG emissions, Part 6 of Title 24 specifically establishes Building Energy Efficiency Standards that are designed to ensure that new and existing buildings in California achieve energy efficiency and preserve outdoor and indoor environmental quality. The California Energy Code is required by law to adopt standards every 3 years that are cost effective for homeowners over the 30-year lifespan of a building. These standards are updated to consider and incorporate new energy efficient technologies and construction methods. As a result, these standards save energy, increase electricity supply reliability, increase indoor comfort, avoid the need to construct new power plants, and help preserve the environment.

The latest update to the Title 24 standards occurred in 2019 and went into effect on January 1, 2020. The 2019 update to the Building Energy Efficiency Standards focused on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential standards include the introduction of

photovoltaic into the prescriptive package and improvements for attics, walls, water heating, and lighting. The most significant efficiency improvements to the nonresidential standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1 2017 National Standards. The 2019 Standards also include changes made throughout its sections to improve the clarity, consistency, and readability of the regulatory language. In December 2021, the 2022 Standards were approved for inclusion into the California Building Standards Code. The 2022 Standards encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. They go into effect on January 1, 2023.

g. California Green Building Standards

California Code of Regulations, Title 24, Part 11 (California Green Building Standard Code [CALGreen]), was adopted in 2010 and went into effect on January 1, 2011. Further updates to CALGreen went into effect on January 1, 2017, and January 1, 2020. The 2022 Standards go into effect January 1, 2023. CALGreen is the first statewide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. The mandatory provisions in CALGreen reduce the use of VOC-emitting materials, strengthen water conservation, and require construction waste recycling.

h. Senate Bill 1078 (the Renewable Portfolio Standard) and Senate Bill 350

SB 1078 (Sher; September 2002) established the Renewable Portfolio Standard (RPS) program, which requires an annual increase in renewable generation by the utilities equivalent to at least 1 percent of retail sales, with an aggregate goal of 20 percent by 2017. Several bills have accelerated and expanded the RPS. Most recently, SB 350 (October 2015) expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030, and interim goals of 40 percent by 2024 and 45 percent by 2027. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses on which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the California Public Utilities Commission, in consultation with the California Energy Commission, to establish efficiency targets for electrical and gas corporations consistent with this goal.

Consequently, utility energy generation from non-renewable resources is expected to be reduced based on implementation of the 60 percent RPS in 2030. Therefore, any project's reliance on non-renewable energy sources would also be reduced.

i. Assembly Bill 1493 and Executive Order S-1-07

In a response to the transportation sector accounting for more than half of California's CO_2 emissions, CARB has adopted several emissions standards to reduce vehicle GHG emissions. AB 1493 (Pavley) was enacted in July 2002. AB 1493 required CARB to set GHG emission standards for passenger vehicles, light-duty trucks, and other vehicles determined by the state board to be vehicles that are primarily used for noncommercial personal transportation in the state. The 2009–2012 standards resulted in a reduction in approximately 22 percent of GHG emissions compared to emissions from

the 2002 fleet, and the 2013–2016 standards resulted in a reduction of approximately 30 percent. Standards that regulate vehicles model years 2009–2016 are termed "Pavley I." CARB adopted a second phase of the Pavley regulations, termed "Pavley II," which are now called the Low Emission Vehicle III (LEV III) Standards. LEV III covers model years 2017–2025.

Issued on January 18, 2007, EO S-1-07 set a declining Low Carbon Fuel Standard (LCFS) for GHG emissions measured in CO_2e grams per unit of fuel energy sold in California. The target of the LCFS is to reduce the carbon intensity of California passenger vehicle fuels by at least 10 percent by 2020. The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 MMT CO_2E in 2020. However, to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 MMT CO_2E.

In January 2012, CARB approved the Advanced Clean Cars program, a new emissions-control program for model years 2015–2025. The program combines the control of smog- and soot-causing pollutants and GHG emissions into a single coordinated package (CARB 2011). To improve air quality, CARB has implemented new emission standards to reduce smog-forming emissions beginning with 2015 model year vehicles. It is estimated that in 2025, cars will emit 75 percent less smog-forming pollution than the average new car sold today. To reduce GHG emissions, CARB, in conjunction with the USEPA and the National Highway Traffic Safety Administration, adopted new GHG standards for model year 2017–2025 vehicles; the new standards are estimated to reduce GHG emissions by 34 percent in 2025.

j. Executive Order N-79-20

Governor Newsom signed EO N-79-20 in September 2020 to end sales of internal combustion passenger vehicles by 2035, which establishes a target for the transportation sector that helps put the state on a path to carbon neutrality by 2045.

k. Senate Bill 375 (Sustainable Communities Strategy)

SB 375 (Steinberg; September 2008) addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans and was enacted into law in September 2008. SB 375 required CARB to adopt regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035. Regional MPOs are then responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan. The goal of the SCS is to establish a forecasted development pattern for the region that, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies.

In 2010, CARB adopted the SB 375 targets for the regional MPOs. The targets for SANDAG are a 15 percent reduction in emissions per capita by 2020 and a 19 percent reduction by 2035. SANDAG completed and adopted its most recent Regional Plan, the 2021 Regional Plan, in December 2021. The

2021 Regional Plan includes the region's SCS in accordance with SB 375 and continues to emphasize alternative transportation infrastructure and infill development.

l. Executive Order S-13-08

EO S-13-08 (November 2008) is intended to hasten California's response to the impacts of global climate change, particularly sea level rise. It directs state agencies to take specified actions to assess and plan for such impacts. In 2021, the California Natural Resources Agency released an updated Climate Change Adaptation Strategy. The update provides recommendations and a framework for policy initiatives in response to the impacts of climate change, with additional considerations for fully integrating equity into California's climate resilience programs (CNRA 2021).

4.4.3 Local

a. City of San Diego General Plan

The City's General Plan Conservation Element contains policies to guide the conservation of resources that are fundamental components of San Diego's environment, help define the City's identity, and are relied upon for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life. For example, Conservation Element Policy CEA.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change.

The Land Use and Community Planning Element; the Mobility Element; the Urban Design Element; and the Public Facilities, Services, and Safety Element also identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. The overall intent of these policies is to support climate protection actions while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

One specific concept introduced in the City's General Plan is the City of Villages strategy, which proposes growth to be directed into pedestrian-friendly, mixed-use activity centers linked to an improved regional transit system. The City of Villages strategy shifts the focus of land use policies to encourage infill development and reinvest in existing communities. Locating different land use types near one another can decrease mobile emissions. Thus, the development of dense urban "villages" would generate fewer GHG emissions. The City of Villages strategy can be seen as an effort to avoid what is commonly referred to as "urban sprawl."

b. City of San Diego Climate Action Plan

An updated qualified CAP was adopted in August 2022 that builds upon the 2015 CAP and establishes a community-wide goal of net zero by 2035. The overall strategies to achieve the CAP target include decarbonization of the built environment, access to clean and renewable energy, reduction of vehicle

miles traveled (VMT) through land use and transportation options, CH_4 capture and waste diversion, resilient infrastructure, habitat restoration, and pursuit of emerging climate actions. The CAP Consistency Checklist, adopted in 2016, has codified as an amendment to the LDC, Chapter 14, Article 3, Division 14, the CAP Consistency Regulations to ensure that all new development is consistent with the updated CAP. The CAP Consistency Regulations apply to specified ministerial and discretionary projects to ensure that the projects comply with the goals and objectives of the updated CAP and contain measures that are required to be implemented on a project-by-project basis to ensure the specified emissions targets identified in this CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP, as determined through the CAP Consistency Regulations, may rely on the CAP for the CEQA cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible.

c. City of San Diego Climate Resilient SD Plan

On December 14, 2021, the San Diego City Council adopted the City's first-ever climate adaptation and resiliency plan. Climate Resilient SD Plan provides strategies to prepare, respond, and recover from potential climate change hazards, like extreme heat, wildfires, sea level rise, and flooding and drought, as well as how the proposed investments can improve local communities. It will increase the City's ability to adapt, recover, and thrive in a changing climate.

4.5 Hazards and Hazardous Materials

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to hazards and hazardous materials, including public health and safety, for the project. The section describes applicable plans, policies, and regulations of federal, state, or regional agencies with jurisdiction over the City.

4.5.1 Federal

a. Resource Conservation and Recovery Act

Federal hazardous waste laws are largely promulgated under the Resource Conservation and Recovery Act (RCRA) (40 CFR, Part 260), as amended by the Hazardous and Solid Waste Amendments of 1984 (which are primarily intended to prevent releases from leaking underground storage tanks). These laws provide for the "cradle to grave" regulation of hazardous wastes. Specifically, under RCRA, any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. The USEPA has the primary responsibility for implementing the RCRA, although individual states can obtain authorization to implement some or all RCRA provisions.

b. Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations, which requires the U.S. Department of Transportation Office of Hazardous Materials Safety to generate regulations for the safe transportation of hazardous materials.

c. Comprehensive Environmental Response, Compensation, and Liability Act

The 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, provides federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Federal actions related to CERCLA are limited to sites on the National Priorities List for cleanup activities, with listings based on the USEPA's Hazard Ranking System. The Hazard Ranking System is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of the hazardous material release and the potential to affect people or environmental resources. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986, as outlined below.

d. Superfund Amendments and Reauthorization Act

SARA is primarily intended to address the emergency management of accidental releases and to establish state and local emergency planning committees responsible for collecting hazardous material inventory, handling, and transportation data. Specifically, under Title III of SARA, a nationwide emergency planning and response program established reporting requirements for businesses that store, handle, or produce significant quantities of hazardous or acutely toxic substances as defined under federal laws. Title III of SARA also requires each state to implement a comprehensive system to inform federal authorities, local agencies, and the public when significant quantities of hazardous or acutely toxic substances are stored or handled at a facility. This data is made available to the community at large under the "right-to-know" provision, with SARA also requiring annual reporting of continuous emissions and accidental releases of specified compounds.

4.5.2 State

a. California Code of Regulations

Most state and federal regulations and requirements that apply to generators of hazardous waste are codified in California Code of Regulations Title 22, Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transportation, treatment, storage, and disposal facilities. Because California is a fully authorized state under the RCRA, most RCRA regulations are integrated into Title 22. The California Environmental Protection Agency (CalEPA) and Control Department of Toxic Substances Control (DTSC) regulate hazardous waste more stringently than the USEPA through Title 22, which does not include as many exemptions or exclusions as the equivalent federal regulations. Similar to the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than the RCRA does. The state has compiled a number of additional regulations from various California Code of Regulations titles related to

hazardous materials, wastes, and toxics into California Code of Regulations Title 26 (Toxics) and provides additional related guidance in Titles 23 (Waters) and 27 (Environmental Protection), although California hazardous waste regulations are still commonly referred to as Title 22.

Title 24 of the California Code of Regulations provides a number of requirements related to fire safety, including applicable elements of Part 2, the California Building Code; Part 2.5, the California Residential Code; and Part 9, the California Fire Code. Specifically, California Building Code, Chapter 7 (Fire and Smoke Protection Features), includes standards related to building materials, systems, and assembly methods to provide fire resistance and prevent the internal and external spreading of fire and smoke (such as the use of non-combustible materials and fire/ember/smoke barriers). California Building Code, Chapter 9 (Fire Protection Systems), provides standards regarding when fire protection systems (such as alarms and automatic sprinklers) are required, as well as criteria for their design, installation, and operation. Section R327 of the California Residential Code includes measures to identify Fire Hazard Severity Zones and assign agency responsibility (i.e., Federal, State, and Local Responsibility Areas [FRAs, SRAs, and LRAs, respectively]; refer to the discussion below under California Department of Forestry and Fire Protection – State Responsibility Area System) and provides fire-related standards for building design, materials, and treatments. The California Fire Code establishes minimum standards to safeguard public health and safety from hazards, including fire in new and existing structures. Specifically, this includes requirements related to fire hazards from building use/occupancy (e.g., access for firefighting equipment/personnel and the provision of water supplies), the installation or alteration/removal of fire suppression or alarm systems, and the management of vegetative fuels and the provision of defensible space.

b. California Health and Safety Code

The CalEPA/DTSC has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code, Section 25531, et seq., incorporates the requirements of SARA and the CAA as they pertain to hazardous materials. Under the California Accidental Release Prevention Program (California Health and Safety Code, Section 25531–25545.3), certain businesses that store or handle more than 500 pounds, 55 gallons, or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management Plan (RMP) to the appropriate local authorities, the designated local administering agency, and the USEPA for review and approval. The RMP is intended to satisfy federal "right-to know" requirements and provide basic information to regulators and first responders, including identification/quantification of regulated substances used or stored on site, operational and safety mechanisms in place (including employee training), and potential on- and off-site consequences of release and emergency response provisions.

Under California Health and Safety Code, Sections 25500–25532, businesses handling or storing certain amounts of hazardous materials are required to prepare a Hazardous Materials Business Emergency Plan, which includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program. Hazardous Materials Business Emergency Plans are also required to include a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material, and must be prepared prior to facility operation (with updates and amendments required for appropriate circumstances such as changes in business location, ownership, or operations).

Pursuant to California Health and Safety Code, Chapter 6.11, CalEPA established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated a number of existing state programs related to hazards and hazardous materials. The Unified Program also allows the designation of Certified Unified Program Agencies (CUPAs) to implement associated state regulations within their jurisdiction. For businesses in the City, applicable hazardous materials plans (such as RMPs and Hazardous Materials Business Emergency Plans) are submitted to and approved by the County Department of Environmental Health and Quality (DEHQ), Hazardous Materials Division (HMD), which is the local CUPA as outlined below under County requirements.

Division 12 (Fires and Fire Protection) of the California Health and Safety Code provides a number of standards related to fire protection methods, including requirements for the management of vegetation comprising a potential fire hazard under Part 5, Chapters 1–3.

c. Investigation and Cleanup of Contaminated Sites

The oversight of hazardous materials release sites often involves several different agencies that may have overlapping authority and jurisdiction. The DTSC and the Regional Water Quality Control Boards (RWQCBs) are the two primary state agencies responsible for issues pertaining to hazardous material release sites. Investigation and remediation activities that would involve potential disturbance or release of hazardous materials must comply with applicable federal, state, and local hazardous materials laws and regulations. The DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. These regulations would be applied during grading activities if, for example, previously unknown underground tanks or other potential contaminant sources were uncovered.

d. Hazardous Materials Transportation

The California Highway Patrol and California Department of Transportation (Caltrans) are the state agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. These agencies also govern permitting for hazardous materials transportation within the state.

e. California Department of Forestry and Fire Protection – State Responsibility Area System

Legislative mandates passed in 1981 (SB 81) and 1982 (SB 1916) require the California Department of Forestry and Fire Protection (CAL FIRE) to develop and implement a system to rank fire hazards in California. CAL FIRE identifies responsibility areas for fire protection, including FRAs, SRAs, and LRAs. The project area is under City jurisdiction; therefore, it is within an LRA. According to the City's Official Very High Fire Hazard Severity Map, the project area is not in a Very High Fire Hazard Severity Zone (City of San Diego 2009).

4.5.3 Local

a. County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division

The County DEHQ/HMD is the local CUPA, and has jurisdiction over hazardous materials plans in the City. The County DEHQ/HMD regulates hazardous waste and tiered permitting, underground storage tanks, aboveground petroleum storage and RMPs, Hazardous Materials Business Plans and chemical inventory, and medical waste. The County DEHQ/HMD also requires businesses that handle reportable quantities of hazardous materials, hazardous wastes, or extremely hazardous substances to submit a Hazardous Materials Business Plan, which includes detailed information on the storage of regulated substances. The County DEHQ/HMD provides guidelines for the preparation and implementation of Hazardous Materials Business Plans, including direction on submittal requirements, covered materials, inspections, and compliance.

The DEHQ/HMD is also the administering agency for the County's Operational Area Hazardous Materials Area Plan (County of San Diego 2011). The County's Hazardous Materials Area Plan identifies the system and procedures used within the County to address hazardous materials emergencies, and provides guidelines for topics such as transportation (including international crossings/inspections), industry/agency coordination, planning, training, public safety, and emergency response/evacuation.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The County Office of Emergency Services and County Unified Disaster Council administer the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) (County of San Diego 2017). The MJHMP is generally intended to promote and provide a multi-jurisdictional approach to compliance with applicable regulatory requirements. The 2017 MJHMP was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdictional coordination. The MJHMP identifies hazardous materials and wildfire/structure fire among the top 11 hazards in the City due to the potential loss of life, injuries, and damage to property and the significance in the disruption of services.

San Diego County Emergency Operations Plan

The County Office of Emergency Services and County Unified Disaster Council administer the County's Emergency Operations Plan (County of San Diego 2022), which provides guidance for responding to major emergencies and disasters. The 2022 Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

b. City of San Diego

The San Diego Fire Department implements the City's Hazardous Materials Program (which requires applicable uses/processes related to hazardous materials to provide disclosure through submittal of a Hazardous Material Information Form and acquisition of an associated permit). The Hazardous Materials Program also includes guidelines and requirements for topics such as education, code enforcement, and safe business practices related to hazardous processes and the use/storage of hazardous materials.

The City's Local Enforcement Agency enforces state minimum standards on public and private solid waste services within the City, including waste collection/disposal, illegal solid waste dumping, and hazardous solid waste sites requiring remediation. The City's Environmental Services Department carries out federal, state, and local waste management requirements, including requirements in the California Public Resources Code and the City's Municipal Code, including the People's Ordinance (collection), the Recycling Ordinance, the Construction and Demolition Debris Ordinance, and the Storage Ordinance. The City's Environmental Services Department also works to move the City toward compliance with its Zero Waste Plan, which is part of its CAP.

The City's Municipal Code includes general hazardous materials regulations in Chapter 4 (Health and Sanitation), Sections 42.0801 and 42.0901 et seq., and Chapter 5 (Public Safety, Morals and Welfare), Section 54.0701, as well as regulations regarding specific hazardous materials such as explosives (Chapter 5, Section 55.3301). Chapter 14 (General Regulations) of the City's Municipal Code also includes requirements pertaining to fire hazard concerns, such as brush management (Section 142.0412), adequate fire flow (Section 144.0240), and construction materials for development near open space (Section 145.0701 et seq.).

c. San Diego County Regional Airport Authority San Diego International Airport Land Use Compatibility Plan

The San Diego International Airport ALUCP was adopted on April 3, 2014, and amended on May 1, 2014. The ALUCP contains policies and criteria for guiding new developments and redevelopments within the Airport Influence Area to address land use compatibilities concerning noise and safety aspects of airport operations and land uses, heights of buildings, residential densities and intensities, and the disclosure of aircraft overflight.

4.6 Historical, Archaeological, and Tribal Cultural Resources

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to historical, archaeological, and Tribal Cultural Resources for the project.

4.6.1 Federal

a. Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Native American tribes.

b. National Historic Preservation Act and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their historical significance. Listing in the NRHP provides recognition that a property is significant to the nation, the state, or the local community and assumes that federal agencies consider historic values in the planning for federal and federally assisted projects. Properties listed in the NRHP, or "determined eligible" for listing, must meet certain criteria for historical significance and possess integrity of form, location, and setting. Structures and features must be at least 50 years old to be considered for listing in the NRHP, barring exceptional circumstances. Criteria for listing in the NRHP, which are set forth in Title 36, Part 63, of the Code of Federal Regulations, are significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and that are:

A. Associated with events that have made a significant contribution to the broad patterns of our history; or

B. Associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the criteria and exhibit integrity, measured by the degree to which the resource retains its historic properties and conveys its historic character, the degree to which the original fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological and paleontological resources. These criteria have largely been incorporated into the CEQA Guidelines.

4.6.2 State

a. California Environmental Quality Act and California Register of Historical Resources

CEQA requires that all private and public activities not specifically exempted be evaluated against the potential for environmental damage, including effects on historical resources. Historical resources are recognized as part of the environment under CEQA. The act defines historical resources as "any object, building, structure, site, area, or place that is historically significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code, Division I, Section 5021.1[b]).

Lead agencies have a responsibility to evaluate historical resources against the California Register of Historical Resources (CRHR) criteria prior to making a finding as to a project's impacts to historical resources. Mitigation of adverse impacts is required if the project will cause substantial adverse change. Substantial adverse change includes demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. While demolition and destruction are fairly obvious significant impacts, it is more difficult to assess when change, alteration, or relocation crosses the threshold of substantial adverse change. The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of a historical resource that convey its historical significance (i.e., its character-defining features) is considered to materially impair the resource's significance. The CRHR is used in the consideration of historical resources relative to significance for purposes of CEQA.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (California Public Resources Code, Section 5024.1; 14 CCR 4852), which consist of the following:

- **Criteria 1:** It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- **Criteria 2:** It is associated with the lives of persons important to local, California, or national history; or
- **Criteria 3:** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; or
- **Criteria 4:** It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

b. Native American Burials (California Public Resources Code, Section 5097 et seq.)

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code, Section 7050.5 et seq., requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the County Coroner has examined the remains (Section 7050.5[b]). California Public Resources Code, Section

5097.98, also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact the California Native American Heritage Commission (NAHC) within 24 hours (Section 7050.5[c]). The NAHC will notify a most likely descendant. With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 24 hours of notification of the most likely descendant by the NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

c. California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act, enacted in 2001, required all state agencies and museums that receive state funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The act also provides a process for the identification and repatriation of these items to the appropriate tribes.

d. Senate Bill 18

Native American involvement in the planning and development review process is addressed by several state laws. The most notable of the state laws is SB 18, which includes detailed requirements for local agencies to consult with identified California Native American tribes early in the planning and/or development process.

e. Assembly Bill 52

On September 25, 2014, Governor Brown signed AB 52, which created the new category of "Tribal Cultural Resources" that must be considered under CEQA. AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested notice of projects proposed within that area. If the tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the tribe. AB 52 also provides a list of recommended mitigation measures to be included in the environmental document.

f. California Health and Safety Code, Section 7050.5

California Health and Safety Code, Section 7050.5, states that in the event of the discovery of human remains outside a dedicated cemetery, all ground disturbance must cease, and the County Coroner must be notified. If the remains are found to be Native American then the County Coroner must contact the NAHC within 24 hours.

4.6.3 Local

a. City of San Diego Historical Resources Regulations

In January 2000, the City's Historical Resources regulations, part of the City's Municipal Code (Chapter 14, Article 3, Division 2, Purpose of Historical Resources Regulations, or Sections 143.0201–143.0280), were adopted, providing a balance between sound historic preservation principles and the rights of

private property owners. The regulations have been developed to implement applicable local, state, and federal policies and mandates. Included in these regulations are the City's General Plan, CEQA, and Section 106 of the National Historic Preservation Act. Historical resources, in the context of the City's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old and may have been altered or still be in use. Historical Resources Guidelines are incorporated in the San Diego LDC LDM by reference. These guidelines set up a development review process to review projects in the City. This process is composed of two aspects: the implementation of the regulations and the determination of impacts and mitigation under CEQA.

Compliance with the regulations begins with the determination of need for a site-specific survey for a project. Section 143.0212(b) of the regulations requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or prehistoric archaeological sites. These maps are based on records of the California Historical Resources Information System maintained by the South Coastal Information Center at San Diego State University and the San Diego Museum of Us (formerly Museum of Man), as well as site-specific information in the City's files. If records show an archaeological site exists on or immediately adjacent to a subject property, the City shall require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a 1-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. A historic property (built environment) survey may be required if the property is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. Section 143.0212(d) of the regulations states that, if a property-specific survey is required, it shall be conducted according to the guidelines criteria. Using the survey results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and where it is located.

b. City of San Diego Historical Resources Register

Compared to CEQA, the City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City of San Diego Historical Resources Board if it meets any of the following criteria (City of San Diego 2021b):

(1) Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

(2) Is identified with persons or events significant in local, State, or national history;

(3) Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

(4) Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

(5) Is listed or has been determined eligible by the National Park Service for listing in the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office for listing in the State Register of Historical Resources; or

(6) Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

c. City of San Diego Comprehensive Historic Preservation Plan

The City's Comprehensive Historic Preservation Plan was prepared by the Historical Site Board and the City's Planning Department in order to direct and focus the City's efforts to deal with increasingly complex historic preservation issues. There are four elements to this plan—Inventory Element, Incentives Element, Education Element, and Draft Historic Resource Board Ordinance. The first three elements were adopted by the San Diego City Council in February 1992; the final element was incorporated into Chapter 14, Article 3, Division 2, of the LDC.

Section 143.0212, Need for Site-Specific Survey and Determination of Location of Historical Resources, directs City staff to determine whether a potentially significant historical resource exists on site before the issuance of a construction permit for any parcel in the City that contains a structure 45 years old or older. Interior development and any modifications or repairs that are limited in scope to an electrical or plumbing/mechanical permit shall be exempt where the development would include no change to the exterior of an existing structure.

d. City of San Diego Historical Resource Board

The Historical Resources Board was established by the San Diego City Council as an advisory board to identify, designate, and preserve the historical resources of the City; to review and make a recommendation to the appropriate decision-making authority on applications for permits and other matters relating to the demolition, destruction, substantial alteration, removal, or relocation of designated historical resources; to establish criteria and provide for a Historical Resources Inventory of properties within the boundaries of the City; and to recommend to the San Diego City Council and Planning Commission procedures to facilitate the use of the Historical Resources Inventory results in the City's planning process in accordance with Section 111.0206 of the LDC.

e. City of San Diego General Plan

The Historic Preservation Element offers a general guide for preserving, protecting, restoring, and rehabilitating historical and cultural resources within the City in order to maintain and encourage appreciation of its history and culture, improve the quality of the City's built environment, maintain the character and identity of its communities, and enhance the local economy through historic preservation. The primary goals of the Historic Preservation Element (City of San Diego 2008) are outlined below:

A. Identification and Preservation of Historical Resources

- Identification of the historical resources of the City.
- Preservation of the City's important historical resources.
- Integration of historic preservation planning in the larger planning process.

B. Historic Preservation, Education, Benefits, and Incentives

- Public education about the importance of historical resources.
- Provision of incentives supporting historic preservation.
- Cultural heritage tourism promoted to the tourist industry.

The detailed policies associated with items A and B above can be found in the Historic Preservation Element (updated 2008) available on the City's website (http://www.sandiego.gov/planning/genplan/).

4.7 Hydrology and Water Quality

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to hydrology and water quality for the project.

4.7.1 Federal

a. Federal Clean Water Act

The CWA is the principal law governing pollution control and water quality of the nation's waterways, including lakes, rivers, aquifers, and coastal areas. The objective of the CWA is to restore and maintain the chemical, physical, and biological integrity of the nation's waters (33 USC 1251). CWA Section 401 requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA controls water pollution through the National Pollutant Discharge Elimination System by regulating point sources that discharge pollutants into waters of the United States. Implementation of the CWA is the responsibility of the USEPA, which has delegated much of that authority to state and regional agencies.

Under CWA Section 303(d), states, territories, and authorized tribes are required to develop lists of impaired waters. These are waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop Total Maximum Daily Loads for these waters. A Total Maximum Daily Load is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

b. Executive Order 11988 – Floodplain Management

The major requirements of this EO are to avoid support of floodplain development; prevent uneconomic, hazardous, or incompatible use of floodplains; protect and preserve the natural and beneficial floodplain values; and be consistent with the standards and criteria of the National Flood Insurance Program. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques and guidelines. Proper floodplain zoning can be beneficial in the

preservation of open space, retention of floodplains as groundwater recharge areas, and directing of development to less flood-prone areas.

4.7.2 State

a. State Water Resources Control Board Construction General Permit

Construction activities that disturb more than 1 acre of land must comply with the Construction General Permit. To be in compliance, the applicant for a construction permit must file a complete and accurate Notice of Intent with the State Water Resources Control Board (SWRCB). Compliance requires conformance with all applicable best management practices (BMPs) and development and implementation of a Stormwater Pollution Prevention Plan. A Stormwater Pollution Prevention Plan's purpose is to develop a strategy for construction projects to comply with stormwater regulations in order to minimize sedimentation, erosion, and point source and non-point source pollutants entering waterways. BMPs are designed to aid and guide on-site personnel to secure a site's stormwater discharges during rain events through prevention, action, and restabilization methods and techniques.

b. Porter-Cologne Water Quality Control Act

The Porter-Cologne Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Act is embodied in the California Water Code, which authorizes the SWRCB to implement the provisions of the federal CWA.

The state is divided into nine regions governed by the RWQCBs. The RWQCBs implement and enforce provisions of the California Water Code and the CWA under the oversight of the SWRCB. The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of basin-specific Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and groundwater basins and establish water quality objectives for those waters.

c. Municipal Separate Storm Sewer System Permit

The most current Municipal Separate Storm Sewer System (MS4) Permit for Region 9, Order No. R9-2013-0001, was adopted on May 8, 2013, by the San Diego RWQCB and became effective on June 27, 2013. This order was amended by adoption of Order No. R9-2015-0001 on February 11, 2015, and adoption of Order No. R9 2015-0100 on November 18, 2015. This is an update to the 2007 MS4 Permit, Order No. R9-2007-0001. Updated City of San Diego Stormwater Standards (based on the Co-Permittees' Model BMP Design Manual) were adopted on February 16, 2016. The project would be subject to the most current MS4 Permit requirements.

The MS4 Permit implements a regional strategy for water quality and related concerns and mandates a watershed-based approach that often encompasses multiple jurisdictions. The overall permit goals include (1) providing a consistent set of requirements for all co-permittees and (2) allowing the co-permittees to focus their efforts and resources on achieving identified goals and improving water quality, rather than just completing individual actions (which may not adequately reflect identified goals). Under this approach, the co-permittees are tasked with prioritizing their individual water quality concerns, as well as providing implementation strategies and schedules to address those

priorities. MS4 Permit conformance entails considerations such as receiving water limitations, waste load allocations, and numeric water quality based effluent limitations. Specific efforts to provide permit conformance and reduce runoff and pollutant discharges to the maximum extent practicable involve methods such as (1) using jurisdictional planning efforts to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing appropriate BMPs, including Low Impact Development (LID) measures, to avoid, minimize, and/or mitigate effects such as increased erosion and off-site sediment transport (sedimentation), hydromodification, and the discharge of pollutants in urban runoff; and (4) using appropriate monitoring/assessment, reporting, and enforcement efforts to ensure proper implementation, documentation, and (as appropriate) modification of permit requirements. The City has implemented a number of regulations to ensure conformance with these requirements, as outlined below under local standards.

d. California Coastal Act

Pursuant to CCA Sections 30231 and 30233, the CCC requires that most development avoid and buffer wetland resources. Policies require the maintenance and restoration of the biological productivity and quality of wetlands and limiting the filling of wetlands. The filling of wetlands is generally limited to high-priority uses and must be avoided unless there "is no feasible less environmentally damaging alternative, and authorized fill must be fully mitigated."

CCA Section 30121 defines the term "wetland" as "lands within the coastal zone which may be covered periodically or permanently with shallow water and include saltwater marshes, freshwater marshes, open or closed brackish water marshes, swamps, mudflats, and fens." Further, the CCC's Wetlands Briefing Background Information Handout 3 regulations (14 CCR 13577) establish a "one-parameter definition" that only requires evidence of a single parameter to establish wetland conditions:

> Wetland shall be defined as land where the water table is at, near, or above the land surface long enough to promote the formation of hydric soils or to support the growth of hydrophytes, and shall also include those types of wetlands where vegetation is lacking and soil is poorly developed or absent as a result of frequent and drastic fluctuations of surface water levels, wave action, water flow, turbidity or high concentrations of salts or other substances in the substrate. Such wetlands can be recognized by the presence of surface water or saturated substrate at some time during each year and their location within, or adjacent to, vegetated wetlands or deep-water habitats.

The CCC's one-parameter definition states that wetlands must have one or more of the following three attributes: "(1) at least periodically the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is nonsoil and is saturated with water or covered by shallow water at some time during the growing season of each year."

The CCC provides further guidance on analyzing wetlands and wetland impacts in the Procedural Guidance for the Review of Wetland Projects in California's Coastal Zone (CCC 1994).

e. California Department of Fish and Game Code – Streambed Alteration Program

The CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for a project that would impact CDFW jurisdictional resources. The Streambed Alteration Agreement with the CDFW typically requires mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or a combination of all three forms.

4.7.3 Local

a. Regional Water Quality Control Board Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange Counties. The basin is composed of 11 major Hydrologic Units, 54 Hydrologic Areas, and 147 Hydrologic Subareas, extending from Laguna Beach southerly to the U.S.–Mexico border. Drainage from higher elevations in the east flows to the west and ultimately into the Pacific Ocean. The RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

b. City of San Diego Jurisdictional Urban Runoff Management Program

This document is a total account of how the City plans to protect and improve the water quality of rivers, bays, and the Pacific Ocean within the region in compliance with the water board permit referenced above. The document describes how the City incorporates stormwater BMPs into land use planning, development review and permitting, City capital improvement program project planning and design, and execution of construction contracts.

c. Water Quality Improvement Plans

The MS4 Permit also requires development of Water Quality Improvement Plans that guide the co-permittees' jurisdictional runoff management programs toward achieving improved water quality in MS4 discharges and receiving waters. The Water Quality Improvement Plans further the CWA's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest-priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions.

d. City of San Diego Drainage Design Manual

Pursuant to City's Municipal Code, Chapter 14, Article 2, Division 2, Storm Water Runoff and Drainage Regulations, drainage regulations apply to all development in the City whether or not a permit or other approval is required.

Drainage design policies and procedures for the City are given in the City's Drainage Design Manual, updated in January 2017. The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for developments within the City. Chapter 1 of the Drainage Design Manual outlines basic policies and objectives. Subsequent chapters provide design criteria. The project would be required to adhere to these existing criteria.

The City would be responsible for reviewing hydrologic and hydraulic studies and design features for conformance to criteria given in the Drainage Design Manual for every map or permit for which development approval is sought from the City.

e. City of San Diego Stormwater Standards Manual

The City updated its Stormwater Standards in October 2018 to comply with the 2013 MS4 Permit and its 2015 amendments (City of San Diego 2021d). The Stormwater Standards provide direction for associated regulatory compliance, including identification of construction and post-construction stormwater requirements for Standard Projects and Priority Development Projects. Specifically, the standards identify regulatory requirements and provide detailed performance standards and monitoring/maintenance efforts for (1) construction BMPs, (2) overall stormwater management design, (3) site design (LID) and source control BMPs applicable to all projects, (4) pollutant (or treatment) control and hydromodification management BMPs applicable to Priority Development Projects, (5) operation and maintenance requirements for applicable BMPs, and (6) specific direction and guidance to provide conformance with City and related National Pollutant Discharge Elimination System stormwater standards.

The updated Stormwater Standards Manual Pollutant Control BMPs require Priority Development Projects to implement LID BMPs that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire). If retention BMPs are determined infeasible, then biofiltration BMPs may be allowed. Furthermore, if biofiltration BMPs are determined infeasible, then the Priority Development Projects may be allowed to use flow-through treatment control BMPs, provided that an off-site alternative compliance project is available.

LID BMPs will be important for site planning because these features require on-site areas to retain stormwater for infiltration, reuse, or evaporation. Although the footprint of the LID BMPs can often be fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features.

f. City of San Diego General Plan

The City's General Plan provides a number of goals and policies related to hydrology and water quality concerns in the Public Facilities, Services, and Safety Element, and in the Conservation Element, as summarized below (City of San Diego 2008):

- **Public Facilities, Services, and Safety Element.** This element includes a number of goals and policies related to the provision of adequate public facilities and services for existing and proposed development (City of San Diego 2021e). For stormwater, these involve efforts to provide appropriately designed and sized infrastructure and ensure adequate conveyance capacity, protect water quality, and provide conformance with applicable regulatory standards (such as the National Pollutant Discharge Elimination System).
- **Conservation Element.** This element provides a number of goals and policies related to preserving and protecting watersheds and natural drainage features, minimizing runoff and related pollutant generation during and after construction activities, and protecting drinking water resources (City of San Diego 2008).

g. City of San Diego Grading Ordinance

The City's Grading Ordinance (City's Municipal Code, Section 142.0101 et seq.) incorporates a number of requirements related to hydrology and water quality, including BMPs necessary to control stormwater pollution from sources such as erosion/sedimentation and construction materials during project construction and operation. Specifically, these include elements related to slope design, erosion/sediment control, revegetation requirements, and material handling/control.

4.8 Noise

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to noise for the project.

4.8.1 Federal

The USEPA has indicated that residential noise exposure of 55 A-weighted decibels (dBA) to 65 dBA is acceptable when analyzing land use compatibility (USEPA 1981); however, these guidelines are not regulatory. With regard to noise exposure and workers, the federal Occupational Safety and Health Administration has established regulations to safeguard the hearing of workers exposed to occupational noise (29 CFR 1910.95). The Occupational Safety and Health Administration specifies that sustained noise over 85 dBA (8-hour time-weighted average) can be a threat to workers' hearing, and if worker exposure exceeds this amount, the employer shall develop and implement a monitoring plan (29 CFR 1910.95[d][1]).

4.8.2 State

a. California Code of Regulations

California Government Code, Section 65302(g), requires the preparation of a General Plan Noise Element that shall identify and appraise the noise problems in the community. The Noise Element

shall recognize the guidelines adopted by the Office of Noise Control in the State Department of Health Services and shall quantify, to the extent practicable, current and projected noise levels for the following sources:

- Highways and freeways
- Primary arterials and major local streets
- Passenger and freight on-line railroad operations and ground rapid transit systems
- Aviation and airport-related operations
- Local industrial plants
- Other ground stationary noise sources contributing to the community noise environment

b. California Noise Control Act

The California Noise Control Act of 1973 (California Health and Safety Code, Sections 46000–46080) finds that excessive noise is a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The act also finds that a continuous and increasing bombardment of noise occurs in urban, suburban, and rural areas. The act declares that the state has a responsibility to protect the health and welfare of its citizens through the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

c. California Noise Insulation Standards (California Code of Regulations, Title 24)

In 1974, the California Commission on Housing and Community Development adopted noise insulation standards for hotels, motels, dormitories, and multi-family residential buildings (California Administrative Code, Title 25, Chapter 1, Subchapter 1). Title 24 requires that residential structures be designed to prevent the intrusion of exterior noise so that the interior noise, with windows closed, attributable to exterior sources shall not exceed 45 dBA community noise equivalent level (CNEL) in any habitable room. The regulations also specify that acoustical studies must be prepared whenever a multi-family residential building or structure may be exposed to exterior noise levels of 60 dBA CNEL or greater. Such acoustical analysis must demonstrate that the residences have been designed to limit intruding noise to a maximum interior noise level of 45 dBA CNEL.

4.8.3 Local

a. City of San Diego General Plan

The Noise Element of the City's General Plan includes the following policies intended to minimize noise through standards, site planning, and noise mitigation. The City's General Plan policies include the separation of excessive noise-generating uses from residential and other noise-sensitive land uses, the limitation of future residential and other noise-sensitive land uses in areas exposed to high levels of noise, and an acoustical study requirement.

In addition, the Noise Element includes the Land Use – Noise Compatibility Guidelines (General Plan Table NE-3), which identify the limits for acceptable noise levels for different land use categories, as illustrated in Table 4-3, City of San Diego Land Use – Noise Compatibility Guidelines (General Plan Table

NE-3). The City conditionally allows multiple-unit and mixed-use residential uses exposed to exterior noise levels of up to the 70 dBA CNEL in areas affected primarily by motor vehicle noises with existing residential uses even though they are not generally considered compatible (City of San Diego 2015b).

Table 4-3. City of San Diego Land Use – Noise Compatibility Guidelines (General Plan Table NE-3)

Land Use Category	Exterior Noise Exposure (dBA CNEL)				
	<60	60–65	65–70	70–75	75+
Parks and Recreational					
Parks; Active and Passive Recreation					
Outdoor Spectator Sports; Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising and Farming; Community Gardens; Aquaculture; Dairies; Horticulture Nurseries and Greenhouses; Animal Raising; Maintenance and Keeping; Commercial Stables					
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; K–12 Educational Facilities; Libraries; Museums; Childcare Facilities		45			
Other Educational Facilities (including Vocational/ Trade Schools and Colleges and Universities)		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Groceries; Pets and Pet Supplies; Sundries, Pharmaceutical, and Convenience Sales; Apparel and Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance and Repair; Personal Services; Assembly and Entertainment (includes Public and Religious Assembly); Radio and Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Vehicle Repair and Maintenance; Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking					

Table 4-3. City of San Diego Land Use – Noise Compatibility Guidelines (General Plan Table NE-3)					
	Exterior Noise Exposure (dBA CNEL)				
Land Use Category	**<60**	**60–65**	**65–70**	**70–75**	**75+**
Wholesale, Distribution, and Storage Use					
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking and Transportation Terminals; Mining and Extractive Industries					
Research and Development				50	

Compatibility Key:

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Sources: City of San Diego 2008, 2015b.
Notes: CNEL = community noise equivalent level; dBA = A-weighted decibel
Compatible noise levels and land use definitions reflect amendments to the City's General Plan Noise Element approved in 2015.

b. City of San Diego Municipal Code

Chapter 5, Article 9.5, Noise Abatement and Control, of the City's Municipal Code declares that the making, creation, or continuance of excessive noises is detrimental to the public health, comfort, convenience, safety, welfare, and prosperity of the City's residents. Section 59.5.0401 establishes sound level limits. The exterior noise limits for each land use classification are summarized in Table 4-4, City of San Diego Table of Applicable Noise Limits. One-hour average sound levels are not to exceed the applicable limit. The noise subject to these limits is defined as that part of the total noise at the specified location that is due solely to the action of said person.

Table 4-4. City of San Diego Table of Applicable Noise Limits		
Land Use	**Time of Day**	**1-Hour Average Sound Level (dBA)**
Single-Family Residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
	7:00 a.m. to 7:00 p.m.	55

Table 4-4. City of San Diego Table of Applicable Noise Limits		
Land Use	**Time of Day**	**1-Hour Average Sound Level (dBA)**
Multi-Family Residential (up to a Maximum Density of 1/2,000)	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All Other Residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City of San Diego 2010.
Notes: dBA = A-weighted decibel

Additionally, Section 59.5.0404 of the City's Municipal Code sets forth limitations related to construction noise (City of San Diego 2010):

A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the work were spread over a longer time; whether proposed night work is in the general public interest; and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.
B. Except as provided in subsection C. hereof, it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12–hour period from 7:00 a.m. to 7:00 p.m.
C. The provisions of subsection B. of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

c. San Diego County Regional Airport Authority San Diego International Airport Land Use Compatibility Plan

See Section 4.5.3, Local, for a discussion on the San Diego County Regional Airport Authority San Diego International Airport ALUCP.

4.9 Paleontological Resources

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to paleontological resources for the project.

4.9.1 Federal

No federal regulations are applicable to paleontological resources.

4.9.2 State

a. California Environmental Quality Act

Pursuant to Section 15065 of the CEQA Guidelines (CCR Sections 15000–15387), a lead agency must find that a project would have a significant effect on the environment when the project has the potential to eliminate important examples of the major periods of California prehistory, including significant paleontological resources. The City's CEQA Significance Determination Thresholds (City of San Diego 2022) are used to make this determination.

b. California Public Resources Code

California Public Resources Code, Section 5097.5, states that a person shall not knowingly and willfully excavate upon or remove, destroy, injure, or deface any historic or prehistoric ruins; burial grounds; archaeological or vertebrate paleontological site, including fossilized footprints; inscriptions made by human agency; rock art; or any other archaeological, paleontological, or historical feature situated on public lands except with the express permission of the public agency with jurisdiction over the lands.

c. California Code of Regulations, Title 14, Division 3, Chapter 1, Sections 4307 and 4309

The California Code of Regulations provides statewide mandates that protect paleontological resources from intentional destruction and desecration. Only with the issuance of a permit from the California Department of Parks and Recreation under Section 4309 may a paleontological resource be removed, treated, disturbed, or destroyed.

4.9.3 Local

a. City of San Diego Municipal Code

The City's LDC (City's Municipal Code, Chapters 11–15) provides detailed development regulations that include regulations related to grading and paleontological monitoring. The City's Municipal Code, Section 142.0151, requires paleontological resources monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the LDM for any of the following:

1. Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
2. Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
3. Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources are discovered during grading, all grading in the area of discovery is required to cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources. The General Grading Guidelines for Paleontological Resources are found in Appendix P of the LDM and do not replace the Significance Determination Thresholds set forth in LDM Appendix A for Paleontological Resources.

4.10 Transportation and Circulation

The following describes the planning framework and additional regulatory documents, plans, and policies relevant to transportation and circulation for the project.

4.10.1 Federal

No federal regulations are applicable to transportation and circulation.

4.10.2 State

a. California Department of Transportation

As the owner and operator of the State Highway System, Caltrans implements established state planning priorities in all functional plans, programs, and activities. Caltrans has the responsibility to coordinate and consult with local jurisdictions when proposed local land use planning and development may impact state highway facilities. Pursuant to Section 21092.4 of the California Public Resources Code, for projects of statewide, regional, or area-wide significance, the lead agency shall consult with transportation planning agencies and public agencies that have transportation facilities that could be affected by the project.

b. Senate Bill 375 (Sustainable Communities Strategy)

SB 375 provides a new planning process to coordinate land use planning and regional transportation plans and funding priorities in order to help California meet the GHG reduction goals established in AB 32.

SB 375 requires that regional transportation plans developed by MPOs (e.g., SANDAG) incorporate an SCS in their regional transportation plans that will achieve regional GHG emissions reduction targets set by CARB. The development of the SCS requires scenario planning that considers a range of alternative land use patterns for the region and transportation investments that achieve the regional target reduction in GHGs. SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as transit-oriented developments.

c. Senate Bill 743 (Transit-Oriented Development and Vehicle Miles Traveled)

In September 2013, Governor Brown signed SB 743, which made significant changes to how transportation impacts are assessed under CEQA. SB 743 directs the Governor's Office of Planning and Research to develop a new metric and approach that replaces level of service analysis and suggests VMT as a metric. SB 743 also creates a new exemption for certain projects that are consistent with the regional SCS and, in some circumstances, eliminates the need to evaluate aesthetic and parking impacts of a project.

The Governor's Office of Planning and Research included the proposed update to the analysis of transportation impacts pursuant to SB 743 in its proposed amendments to the CEQA Guidelines. The California Natural Resources Agency finalized the updates to the CEQA Guidelines in November 2018, and the changes were approved by the Office of Administrative Law and filed with the Secretary of State; these changes are now in effect. According to the California Natural Resources Agency's Final Statement of Reasons for Regulatory Action, the new rules for applying the VMT metric in transportation analyses became mandatory on July 1, 2020.

d. Assembly Bill 1358 (California Complete Streets Act)

AB 1358, the California Complete Streets Act (California Government Code, Sections 65040.2 and 65302), required General Plan Circulation Elements as of January 1, 2011, to accommodate the transportation system from a multimodal perspective, including public transit, walking, and biking.

4.10.3 Local

a. San Diego Association of Governments

SANDAG is the region's transportation and land use planning agency for the County's 19 local governments. SANDAG is governed by a Board of Directors composed of mayors, councilmembers, and County supervisors from local governments, including the City. The City also participates in the development and adoption of SANDAG documents and programs through staff participation on advisory committees and direct citizen participation. Key regional planning efforts include the following plans and programs.

San Diego Forward: The Regional Plan

Refer to Section 4.1.3, Local, for a discussion of SANDAG's 2021 Regional Plan.

Regional Transportation Improvement Plan

SANDAG is the MPO and regional transportation planning agency for the San Diego region. State and federal law requires MPOs to develop and adopt a regional transportation improvement program. This program is effective for 5 fiscal years and encompasses major transportation projects throughout the San Diego region. The most recent version of the Regional Transportation Improvement Plan was adopted by the SANDAG Board of Directors on December 10, 2021.

Riding to 2050: San Diego Regional Bike Plan

The Riding to 2050: San Diego Regional Bike Plan (Regional Bike Plan) was adopted by SANDAG to provide a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce GHG emissions and improve mobility. Goals of the Regional Bike Plan include increasing levels of bicycling, improving bicycling safety, encouraging complete streets, supporting reductions in emissions, and increasing community support. The Regional Bike Plan supports the implementation of the 2021 Regional Plan, which calls for more transportation choices and a balanced regional transportation system that supports smart growth and a more sustainable region. The Regional Bike Plan provides a critical component of that balanced system and the programs necessary to support it (SANDAG 2010).

b. City of San Diego General Plan

The City's General Plan Mobility Element provides policies to attain a balanced, multimodal transportation network where each mode, or type of transportation, is able to contribute to an efficient network of services meeting varied user needs. In addition to addressing walking, streets, and transit, the Mobility Element also includes policies related to regional collaboration, bicycling, parking, goods movement, transportation demand management, and other components of the transportation system. Taken together, these policies advance a strategy for congestion relief and increased transportation choices in a manner that strengthens the City of Villages strategy and helps achieve a clean and sustainable environment (City of San Diego 2008).

c. City of San Diego Municipal Code

Chapter 8, Traffic and Vehicles, of the City's Municipal Code regulates traffic control devices and signs on public roads, parking restrictions, restrictions on use of public roadways, parking regulations for vehicles transporting hazardous materials, and temporary (construction) traffic controls and road closures.

d. City of San Diego Bicycle Master Plan

The 2013 update to the City's 2002 Bicycle Master Plan presents a renewed vision closely aligned with the City's General Plan and includes a bicycle network with related bicycle projects, policies, and programs. The proposed bikeway network was developed to complement and connect with the proposed network in the 2002 Bicycle Master Plan, the 2006 San Diego Downtown Community Plan, and the 2010 San Diego Regional Bicycle Plan. There are approximately 511 miles of existing bikeway facilities with the majority composed of Bike Lanes. The recommended bicycle network includes

recommendations for an additional 595 miles of bicycle facilities for a future network totaling almost 1,090 miles (City of San Diego 2013).

The types of projects recommended in the Bicycle Master Plan include bikeways (Class I – Bike Path, Class II – Bike Lane, Class III – Bike Route, Bicycle Boulevards, and Cycle Tracks); bike parking, such as bike racks and on-street bike corrals; end-of-trip facilities that may be identified as part of individual development projects; maintenance activities, such as road and sign repair; bicycle signal detection installation, signage, and striping for warnings and wayfinding; and multimodal connection improvements, such as providing secure bicycle parking at transit stops (City of San Diego 2013).

Bicycle facilities in the project area that are proposed in the Bicycle Master Plan include a Class II or III bicycle facility along Mission Bay Drive from Damon Avenue to Grand Avenue and along Balboa/Garnet Avenue from the Rose Creek Trail to Moraga Avenue.

e. City of San Diego Transportation Study Manual

In December 2020, the City approved its Transportation Study Manual to implement the required shift from a level of service CEQA analysis to a VMT CEQA analysis as a result of SB 743 and to better address all transportation modes. The purpose of this Transportation Study Manual is to provide guidance on how to prepare transportation studies in the City and to ensure consistency among consultants, predictability in preparation, consistency among reviewers, and conformance with all applicable City and state regulations, including CEQA. This Transportation Study Manual provides guidance for the following (City of San Diego 2020a):

- The City's CEQA significance thresholds, screening criteria, and methodology for conducting the transportation VMT analysis.
- Preparation of Local Mobility Analyses to identify any off-site infrastructure improvements in the project vicinity that may be triggered with the development of the project, analyze site access and circulation, and evaluate the local multimodal network available to serve the project.

f. City of San Diego Complete Communities: Housing Solutions and Mobility Choices

The City's Complete Communities: Housing Solutions and Mobility Choices (Complete Communities Program) was adopted by the San Diego City Council on November 9, 2020. The Complete Communities Program focuses on four key areas: housing, mobility, parks, and infrastructure. It includes planning strategies that work together to create incentives to build residences near transit, provide more mobility choices, and enhance opportunities for places to walk, bike, relax, and play. The Complete Communities Program also focuses on locating new development combined with the mobility network to be around transit hubs and existing development to support GHG emissions reductions (City of San Diego 2020b). The Complete Communities: Housing Solutions is referred to as the "Housing Program," while the Complete Communities: Mobility Choices is referred to as the "Mobility Choices Program."

The purpose of the Mobility Choices Program is to implement SB 743 by ensuring that new development mitigates transportation impacts based on VMT to the extent feasible while incentivizing development in the City's urban areas. The Mobility Choices Program aims to provide more mobility

options for San Diegans to commute and recreate by streamlining development, such as pedestrian and bicycle facilities, in areas of the City. The Mobility Choices Program supports implementation of an enhanced active transportation network in VMT-efficient areas and implementation of VMT reduction measures to encourage and support the use of the active transportation network. It also identifies several VMT reduction measures required for new development in VMT-efficient areas to offset new VMT impacts (City of San Diego 2020b).

5

Chapter 5.0
Environmental Analysis

The following sections analyze the potential environmental impacts that may occur from implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The environmental issues addressed in this chapter include the following:

- Land Use
- Air Quality and Odor
- Biological Resources
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Historical, Archaeological, and Tribal Cultural Resources
- Hydrology and Water Quality
- Noise
- Paleontological Resources
- Transportation and Circulation

Each issue analysis section includes a description of existing conditions (or a reference to Chapter 2.0, Environmental Setting, for the environmental setting), the significance determination thresholds, an evaluation of potential project impacts, the significance of impacts, mitigation measures (if applicable), and a conclusion of significance after mitigation for impacts identified as requiring mitigation (if applicable).

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5.1 Land Use

This section analyzes potential impacts related to land use that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on review of available plans and technical information, including the City of San Diego's (City's) General Plan (City of San Diego 2008), the City's Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021a) and MBPMP Environmental Impact Report (EIR) (City of San Diego 1994), the project-specific Land Use Consistency Tables (Appendix B, Land Use Consistency Tables), other applicable planning documents, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022a).

5.1.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing conditions relative to land use (Section 2.3.1, Land Use), and Chapter 4.0, Regulatory Framework (Section 4.1, Land Use), for a discussion of relevant land use plans, policies, and regulations. In summary, the project has been assigned land use designations by the MBPMP. The project area is bounded by Mission Bay to the south, Interstate 5 to the east, Mission Bay Senior High School to the north, residences and commercial uses in Pacific Beach to the north and northeast, and residential and commercial uses and Crown Point Park to the west and southwest.

5.1.2 Significance Determination Thresholds

The determination of significance regarding inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental impacts considered significant under CEQA. Thresholds used to evaluate potential impacts related to land use were modified from criteria in Appendix G of the CEQA Guidelines and the City's CEQA Significance Determination Thresholds (City of San Diego 2022a) to reflect a programmatic analysis for the proposed project. A significant impact would occur if implementation of the project would:

1. Conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation, and as a result, cause an indirect or secondary environmental impact;
2. Result in the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community;
3. Conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan; or
4. Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP).

5.1.3 Impact Analysis

5.1.3.1 Issue 1: Conflicts with Applicable Plans

Would the proposed project conflict with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation and as a result, cause an indirect or secondary environmental impact?

The following discussion addresses the project's consistency with applicable land use plans, policies, and regulations as described in Chapter 4.0. Appendix B identifies the plans and applicable goals and policies that are relevant to the project and provides an evaluation of the project's consistency with them.

a. City of San Diego's General Plan

The City's General Plan (City of San Diego 2008) provides guidance for development in the City. It is currently composed of nine elements that provide a comprehensive slate of Citywide policies to help further the City's goals for growth and development, one of which is the Land Use and Community Planning Element. This element provides policies to guide the City's growth and implement the City of Villages strategy within the context of San Diego's community planning program. Further, the Land Use and Community Planning Element includes land use designations to help guide cohesive development in the City. As shown on Figure 5.1-1, General Plan Designations, the entire project area is designated as Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008). The project is consistent with the current General Plan land use designation and would not conflict with the goals, objectives, or guidelines of the City's General Plan. See Appendix B for a discussion of the project's compliance with relevant goals and policies of the City's General Plan. Impacts would be less than significant.

b. Mission Bay Park Master Plan

The project area is entirely within the boundaries of the MBPMP (City of San Diego 2021a). The MBPMP serves as the Community Plan and Local Coastal Program (CP/LCP) Land Use Plan for Mission Bay Park. The project area is designated in the MBPMP as Special Study Area (SSA), Active Recreation, Regional Parkland, Natural Areas, and Dedicated Lease Areas; see Figure 5.1-2, De Anza Special Study Area.

The project is subject to the goals and recommendations established in the MBPMP. The MBPMP recommends that the project area should serve regional recreation needs, including guest accommodations (RVs and other low-cost camping facilities); improve the park's water quality, including creating additional wetlands; facilitate hydrologic improvements to safeguard the viability of marsh areas; increase and enhance waterfront access via a multi-use path, viewing areas, and other passive recreational features; ensure that leaseholds support Mission Bay recreation use; improve access to recreational uses; encourage preservation of natural resources; encourage sustainable green building techniques; and improve play areas and increase park facilities for community and regional recreational needs (City of San Diego 2021a). As described in Chapter 3.0, Project Description, and illustrated on Figure 3-1, Site Plan, the project seeks to implement the recommendations of the MBPMP. This is further explained below, and a consistency analysis is included in Appendix B.

The original intent of the SSA was "to be a flexible planning area in which public and private uses can be accommodated under varying intensities and configurations." Further, the MBPMP acknowledged that the uncertainty of multiple development factors "currently prevents the generation of more specific land use concepts" (City of San Diego 2021a). The De Anza Natural Amendment is the result of the original MBPMP's deferral for future study. Therefore, the designation is proposed to be "De Anza Natural," replacing the SSA.

The project meets the overall intent of the De Anza Natural as it is currently envisioned in the MBPMP and includes amendments to refine the uses specific to the De Anza Natural, allows for future athletic fields, retains regional parkland, adds a potential water quality feature, adds future lease opportunities for boat rentals, includes upland/developed areas, and plans for expanded marshland/habitat.

The current adopted MBPMP recommends relocating Campland on the Bay (Campland) because it is incompatible with the environmental objectives of the park and with the goal of restoring the land to a natural habitat area. The project would include wetlands enhancement and restoration in City-owned portions of the existing Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), the area currently occupied by Campland, the eastern side of Rose Creek, and the areas in De Anza Cove currently occupied by the vacated mobile home park and open water. To the west of Rose Creek, the project seeks to implement the vision of the MBPMP by removing Campland and replacing it with habitat contiguous to the existing KFMR/NWP. The adopted MBPMP states, "West and south of Rose Creek inlet, and contiguous with the NWP, an 80+/- acre wetland habitat area is proposed" (City of San Diego 2021a). The project allows for a total of 227.4 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the KFMR/NWP. Thus, the project would be consistent with this recommendation of the MBPMP.

As demonstrated by the consistency analysis in Appendix B, the project would be consistent with the goals of the MBPMP. Impacts would be less than significant.

c. Land Development Code Regulations

The Land Development Code (LDC) sets forth the procedures used in the application of land use regulations, types of development review and regulations that apply to the use and development of land in the City. The intent of these procedures and regulations is to facilitate fair and effective decision-making and to encourage public participation (City of San Diego 2021b). A general discussion of the project's consistency with the regulations of the LDC is provided below.

Environmentally Sensitive Lands Regulations

The purpose of Environmentally Sensitive Lands (ESL) regulations is to protect, preserve, and where damaged, restore the ESL (e.g., wetlands, sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas) of San Diego and the viability of the species supported by those lands. These regulations are intended to ensure that development, including but not limited to coastal development in the Coastal Overlay Zone, occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats,

maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities (City of San Diego 2022b). The project could potentially impact ESL (e.g., wetlands) through creation, restoration, and enhancement activities.

The City's ESL regulations state that impacts to wetlands shall be avoided and only the uses identified in Section 143.0130(d) of the ESL regulations shall be permitted; these are limited to aquaculture, nature study projects or similar resource dependent uses, wetland restoration projects, and incidental public service projects. As stated in Section 143.0130(d)(3), such impacts to wetlands shall occur only if there is no feasible less environmentally damaging location or alternative and where mitigation measures have been provided to minimize adverse environmental effects. Deviations from the ESL regulations within the Coastal Overlay Zone shall be approved only after the decision-maker makes an economically viable use determination and findings pursuant to City's Municipal Code, Section 126.0708(b).

As described in Section 5.3, Biological Resources, the project would result in expansion and enhancement of wetlands in the De Anza Cove area and KFMR/NWP project component areas, which would result in a net benefit to associated wildlife species by providing an overall increase in wetland habitat. The proposed restoration/creation activities would be a compatible use within Coastal Overlay Zone wetland buffers (i.e., restoration) in accordance with the allowed uses listed in Section 143.0130, Uses Allowed Within Environmentally Sensitive Lands, of the City's LDC. In addition, to the extent feasible, the project would be designed to minimize the extent of construction activities in and adjacent to wetlands, including the number of access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized. Impacts would be less than significant, and no mitigation is required. Refer to Section 5.3 for further details.

The project would not conflict with the City's ESL regulations. Impacts would be less than significant.

Biology Guidelines

The City's Biology Guidelines, Volume II, Section I, as part of the Land Development Manual, were revised in 2018 by the City to aid in the implementation and interpretation of the ESL regulations and the Open Space Residential Zone (OR-1-2) and the MSCP Subarea Plan (SAP). Section III of the Biology Guidelines provides standards for the determination of impact and mitigation under CEQA and the California Coastal Act (CCA). Further, these guidelines are the baseline standards for processing Neighborhood Development Permits, Site Development Permits, and Coastal Development Permits issued pursuant to the ESL regulations (City of San Diego 2018). Attachment B of the City's Biology Guidelines provides a General Outline for Conceptual Revegetation/Restoration Plans, and Appendix II includes the Guidelines for Conducting Biology Surveys. As described in Section 5.3, implementation of the project and Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would comply with the City's Biology Guidelines for the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources. Impacts would be less than significant.

Historical Resources Regulations

The City's Historical Resources regulations (Section 143.0213[a] of the LDC) apply when historical resources are present. As defined by these regulations, historical resources include designated

historical resources, historical buildings, historical structures, historical objects, important archaeological sites, historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, and Traditional Cultural Properties. As indicated in Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, and Appendix H, Historical Resources Constraints Technical Memorandum, currently, no designated historical resources are within the project area. The project area includes the following buildings and structures that were identified to be over 45 years old:

- Mission Bay Golf Course and Practice Center (c. 1955)
- Pacific Beach Tennis Club (c. 1961)
- Mission Bay RV Resort (c. 1955)
- De Anza Cove mobile home park, including homes and administration buildings (c. 1965)
- Campland (c. 1969)
- Mission Bay Boat and Ski Club (c. 1963)

The City's Municipal Code, Section 143.0212, requires review of all building, demolition, or entitlement applications impacting a building 45 years old or older to determine whether historical resources exist in the project area prior to issuance of the permit. Subsequent site-specific development within the project area would be required to comply with Section 143.0212 and would be reviewed for conformance with the goals and policies relating to the identification and preservation of historical resources in the Historic Preservation Element of the City's General Plan. A site-specific survey shall be required when it is determined that a historical resource may exist on the parcel where the development is located and if the development proposes a substantial alteration according to City's Municipal Code, Section 143.0250(a)(3) (City's Municipal Code, Section 143.0212[c]). If a site-specific survey is required, it shall be conducted consistent with the Historical Resources Guidelines of the Land Development Manual (City's Municipal Code, Section 143.0212[d]). Adherence to the Historical Resources regulations and Guidelines would ensure that appropriate measures are applied to protect historical resources consistent with City requirements.

The project would comply with the Historical Resources regulations in the City's Municipal Code (Section 143.0213[a] of the LDC) and would not result in a conflict with the LDC. Impacts would be less than significant.

d. San Diego Association of Governments' 2021 Regional Plan

Within the San Diego Association of Governments' 2021 Regional Plan are Five Big Moves that are accompanied by strategies to advance the San Diego region toward sustainability, reduce greenhouse gas emissions, and address economic and societal inequities and public health and safety issues. The plan includes five key strategies for mobility, also known as the Five Big Moves. The strategies are designed to promote the increased use of zero-emission vehicles and to encourage people to walk, ride bikes, and pursue other forms of active or alternative transportation. Safe and convenient places to park, as well as charging stations for electric vehicles, e-bikes, scooters, and other electric rideables, would be offered, along with incentives to purchase those vehicles (SANDAG 2021).

The proposed project recommends improvements to existing parkland, including the reconfiguration and improvements to recreational areas, restoration of habitat and creation of new habitat. The project

would reduce overall development density on the site, which would decrease vehicle trips compared to the current baseline condition (see Appendix L, Transportation Impact Analysis, for more details).

In addition, the proposed project includes improved active transportation connections for pedestrian and bicycle facilities through the inclusion of multi-use pathways for pedestrians and bicyclists that would provide both internal and off-site connections with the surrounding community. Improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residential communities would help reduce vehicle miles traveled. In addition, the Mid-Coast Trolley, which consists of the Metropolitan Transit System Blue Line Trolley line extension from Downtown San Diego to the University community, is located east of the project area. The Balboa Avenue Station, located 0.25 mile northeast of the project area, and the Clairemont Drive Station, located 0.75 mile southeast of the project area, would provide region-serving high-quality light-rail transit to the project area. Future development within the project area would also provide electric vehicle infrastructure in compliance with Chapter 14, Article 2, Division 5, of the City's Municipal Code.

Therefore, the project would not conflict with the goals and objectives of the 2021 Regional Plan. Impacts would be less than significant.

e. Climate Action Plan

As discussed in Section 5.4, Greenhous Gas Emissions, the proposed project includes land uses that are consistent with those identified within the MBPMP, including natural areas, active recreation, and guest accommodations. Therefore, the project is consistent with the MBPMP and underlying zoning and, thus, is consistent with the City's 2022 Climate Action Plan (CAP) (City of San Diego 2022c).

Strategy 3, Mobility and Land Use, identified in the CAP is to improve internal processes to prioritize infrastructure projects that support sustainable mode choices such as walking, bicycling, and transit use (City of San Diego 2022c). The project would enhance safety and opportunities for sustainable, multimodal travel, including pedestrian and bicyclist connectivity to, from, and throughout the project area, which would increase connections to surrounding communities and the region. The Mid-Coast Trolley, located east of the project area, consists of the Metropolitan Transit System Blue Line Trolley from Downtown San Diego to the University Community Plan area. The Balboa Avenue Station, located 0.25 mile northeast of the project area, and the Clairemont Drive Station, located 0.75 mile southeast of the project area, would provide regional-serving light-rail transit to the project area.

Class I multi-use path facilities are provided within certain areas of De Anza Cove, as well as within Mission Bay Park, and are supplemented by Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. The project includes multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities. The proposed multimodal facilities would support the MBPMP policies and goals to make biking more comfortable and accessible by providing better-quality bicycle facilities.

The project also supports Strategy 5, Resilient Infrastructure and Healthy Ecosystems, identified in the CAP, as it includes the restoration and enhancement of wetlands, which have been identified in the City's Climate Resilient SD Plan as important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. The conversion of

currently developed land to restored habitat would support the conservation of natural habitats facing sea level risk.

Project improvements would be consistent with and would aid in implementing the CAP land use and mobility strategies. The project would not conflict with the City's CAP; therefore, impacts would be less than significant.

f. Climate Resilient SD Plan

On December 14, 2021, the San Diego City Council adopted the City's first-ever climate adaptation and resiliency plan. The Climate Resilient SD Plan provides strategies to prepare, respond to, and recover from potential climate change hazards, like extreme heat, wildfires, sea level rise, and flooding and drought, as well as how the proposed investments can improve local communities. It will increase the City's ability to adapt, recover, and thrive in a changing climate. Key plan components include connected and informed communities, resilient and equitable planning and investment, protection for historical and Tribal resources, protection of natural environments, and maintenance of critical infrastructure (City of San Diego 2021c).

The project supports the plan goals and policies related to protecting natural environments. Specifically, the proposed habitat restoration supports implementation of Policy TNE-1, which includes supporting ecosystem and watershed function to increase the capacity of the system to withstand stress from climate change, and Policy TNE-2, which includes expansion of natural features, including wetlands (City of San Diego 2021c). Wetlands are identified as an important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. The project does include any components that would conflict with the remaining plan components. Therefore, the project would be consistent with the Climate Resilient SD Plan.

g. California Coastal Act

The CCA requires projects within the Coastal Overlay Zone to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. The proposed project includes an LCP Land Use Plan that requires approval by the City and certification by the California Coastal Commission. Appendix B demonstrates that the project would not conflict with the CCA because the project would provide recreational opportunities and public access to the shoreline and would include low-cost visitor guest accommodations, consistent with the policies of the CCA. Therefore, impacts would be less than significant.

h. Mission Bay Park Natural Resource Management Plan

The proposed project seeks to implement the vision of the adopted MBPMP by expanding wetland habitat, including the removal and replacement of Campland with habitat contiguous to the existing KFMR/NWP. The MBPMP EIR (City of San Diego 1994) analyzed compliance with the 1995 Mission Bay Park Natural Resource Management Plan (NRMP). The analysis specifically cites the proposed change in land use related to the demolition of Campland as an example of how the MBPMP maximizes the benefits of habitat areas by placing them in large contiguous sites (City of San Diego 1994). The NRMP also provides for agreements between the City and resource agencies as to the maintenance and

responsibilities for regional natural resources such as the California least tern (*Sterna antillarum browni*) and eelgrass. Therefore, the project would not conflict with the NRMP, and impacts would be less than significant.

i. Pacific Beach Community Plan and Local Coastal Program Land Use Plan

The Pacific Beach CP/LCP, adopted in 1994 and amended in 2019, proposes specific goals, policies, and strategies regarding the use and development of land within Pacific Beach and identifies how land use and development will affect public services and facilities such as local schools, parks, roads, water and public safety (City of San Diego 2019). The community of Pacific Beach is located directly north of Mission Bay, and the Pacific Beach CP/LCP boundary borders the project area to the north and northeast.

The entirety of the project area is located outside the boundary of the Pacific Beach CP/LCP; thus, the project would not be subject to the specific policies of this plan. However, due to the project area's adjacency to the plan area, this analysis generally evaluates the project's consistency with overall themes of applicable goals and policies of the Pacific Beach CP/LCP. The applicable goals of the Circulation Element of the Pacific Beach CP/LCP aim to create safe, pleasant, and useful pedestrian and bicycle pathways to connect the residential neighborhoods of Pacific Beach with commercial areas and community facilities (City of San Diego 2019). The proposed project would enhance public access, recreational facilities, and pedestrian/bicycle circulation throughout the project area and, thus, would not conflict with these overall goals of the Pacific Beach CP/LCP.

Applicable goals in the Parks and Open Space Element of the Pacific Beach CP/LCP include the following:

- Provide sufficient community park and recreational facilities to meet the needs of the existing and future resident population.
- Promote the development, maintenance, and safety of beach, park and bay recreational facilities within the community and in those areas adjacent to Pacific Beach (such as the Mission Bay Golf Course or the Tourmaline Surfing Park) to serve both residents and visitors while ensuring that such facilities will not adversely affect the community in terms of increased traffic or parking overflow.
- Conserve and enhance the natural amenities of the community such as its open space, topography, beach, and plant life and achieve a desirable relationship between the natural and developed areas of the community, as is exemplified by Kate Sessions Park.
- Preserve significant environmental resource areas, such as the City-owned Kate Sessions Park, Rose Creek, Coastal Bluffs, and the Northern Wildlife Preserve (owned in part by the City and in part by the University of California), in their natural state.
- Improve access to beach, bay, and park areas along the shoreline to benefit residents and visitors.
- Maintain and enhance public views to the Pacific Ocean, Mission Bay, NWP, and Kate Sessions Park.

The proposed project would retain active recreation areas, enhance recreational facilities adjacent to Pacific Beach, improve access to the park areas along the bay shoreline for residents and visitors, conserve and enhance the natural amenities of the community such as its open space and topography, preserve significant environmental resource areas, and maintain and expand public views to the KFMR/NWP. Therefore, the project would not conflict with the goals of the Pacific Beach CP/LCP. Impacts would be less than significant.

j. Balboa Avenue Station Area Specific Plan

The Balboa Avenue Station Area Specific Plan (BASASP), adopted in 2021, is a comprehensive planning document that provides a policy framework to guide transit-oriented public and private development and multimodal improvements adjacent to the Balboa Avenue Trolley Station. The BASASP area is approximately 210 acres and is in the Pacific Beach and Clairemont Mesa communities, just north of the project area. The BASASP contains policies and supplemental development regulations for properties in the Pacific Beach portion of the BASASP area (City of San Diego 2021d).

The entirety of the project area is located outside the boundary of the BASASP, and thus, the project would not be subject to the goals and objectives of the BASASP. However, the BASASP identifies multimodal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Trolley Station, which is located 0.25 mile from the project area. The BASASP also supports implementation of multimodal improvements to enhance transit, bicycle, and pedestrian facilities designed to increase safety at the intersection of Grand Avenue and Mission Bay Drive, located directly north of the project area. The BASASP includes policies to evaluate improvements at intersections, including Mission Bay Drive and Grand Avenue, as well as potential traffic circles and bulb-outs along Bond Avenue, in order to minimize conflicts and improve safety. The proposed project includes improved active transportation connections for pedestrian and bicycle facilities through the inclusion of multi-use pathways for pedestrians and bicyclists that would provide connections to off-site existing facilities. In addition, the Mid-Coast Trolley, which consists of the Metropolitan Transit System Blue Line Trolley line extension from Downtown San Diego to the University community, is located east of the project area. The Balboa Avenue Station located 0.25-mile northeast of the project area would provide region-serving high-quality light-rail transit to the project area. Therefore, the project would not conflict with the goals and objectives of the BASASP. Impacts would be less than significant.

5.1.3.2 Issue 2: Conversion of Open Space or Farmland

Would the proposed project lead to the development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use, resulting in a physical division of the community?

The project area is classified by the California Department of Conservation Farmland Mapping and Monitoring Program map as Urban and Built-Up Land (DOC 2022). As such, the project area is not designated as Prime Farmland. The entire project area is designated Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008) and would remain parkland. The current adopted MBPMP recommends the relocation of Campland because it is incompatible with the environmental objectives of the park and with the goal of restoring the land to a natural habitat area. The proposed restoration of this area includes a combination of wetlands and upland habitat. The proposed project would result in increased acreage of natural open space consistent with the existing land use designation and goals of the MBPMP. The proposed project would not result in or propose conversion of open space to a more intensive land use.

Additionally, proposed improvements on the eastern portion of the project area include construction of guest accommodations, water quality improvements, and the restoration/creation of wetlands, hydrologic improvements, a waterfront trail, viewing areas, and other passive recreational features.

Proposed improvements are consistent with the overall intent and goals of the project area as prescribed by the MBPMP. The project would keep with existing land uses and does not propose more intensive land uses that would divide a community. Surrounding land uses include Mission Bay to the south, Interstate 5 to the southeast, Mission Bay Senior High School to the northwest, residences and commercial uses to the north and northeast, and residential and commercial uses and Crown Point Park to the west and southwest. The project would be compatible with the existing surrounding land uses. Therefore, no impact would occur.

5.1.3.3 Issue 3: Conflicts with the MSCP Subarea Plan

Would the proposed project conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan or other approved local, regional, or state habitat conservation plan?

a. MSCP Subarea Plan

The MSCP SAP designates land preserved for conservation as the Multi-Habitat Planning Area (MHPA). The project area covers some Urban Habitat Areas included in the MHPA, which are lands managed pursuant to the existing NRMP (City of San Diego 1990). According to the City's MSCP SAP, the KFMR/NWP on the western side of the project area is within the MHPA boundary and includes riparian/wetlands and beach/foredunes vegetation communities. The MHPA Guidelines for Urban Habitat Areas stipulate that the management of California least tern areas shall be pursuant to the adopted MBPMP and associated NRMP (City of San Diego 1997).

The project would expand the existing preserve area by replacing Campland with natural habitat, as recommended in the MBPMP. This new habitat area would include a combination of wetlands and upland habitat and would be contiguous with the KFMR/NWP. Additionally, the project would allow for restoration and enhancement activities in the KFMR/NWP, as previously described. As discussed in Section 5.3 and Appendix D, Biological Resources Technical Report, the project is required to document compliance with the MSCP SAP and must comply with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, species-specific ASMDs provided in the MSCP SAP Appendix A, and the MSCP SAP Siting Criteria (City of San Diego 1997). Portions of the project area are within and adjacent to the MHPA, and the project is required to document compliance with the MSCP MHPA Land Use Adjacency Guidelines. The project would be consistent with the policies and requirements of the MSCP SAP, and no impact would occur.

5.1.3.4 Issue 4: Conflicts with an Adopted Airport Land Use Compatibility Plan

Would the proposed project result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?

The San Diego Regional Airport Authority is an independent agency that was created to manage the day-to-day operations of San Diego International Airport and address the region's long-term air transportation needs. One of the airport authority's responsibilities is to serve as the Airport Land Use Commission (ALUC) for San Diego County. The ALUC is responsible for adopting ALUCPs for

16 public-use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general (SDCRAA 2014).

An ALUCP focuses on a defined area around each airport known as the Airport Influence Area (AIA). The AIA is composed of noise, safety, airspace protection, and overflight factors in accordance with guidance from the California Airport Land Use Planning Handbook published by the California Department of Transportation, Division of Aeronautics (SDCRAA 2018). Development that occurs within an AIA must conform to the applicable land use plans and regulations, which must also be consistent with any ALUCPs adopted by the ALUC.

The nearest airports to the project area are the Montgomery-Gibbs Executive Airport, located approximately 4 miles northeast, and the San Diego International Airport, located approximately 4 miles south. Both airports have adopted ALUCPs. However, the project area is not located within the AIA of either airport and would not be subject to either ALUCP. Therefore, the project would not result in land uses that are incompatible with an adopted ALUCP. No impact would occur.

5.1.4 Significance of Impacts

5.1.4.1 Conflicts with Applicable Plans

Implementation of the project would not conflict with the environmental goals, objectives, or guidelines of the City's General Plan or other applicable land use plan or regulation including the MBPMP, LDC, 2021 Regional Plan, CAP, Climate Resilient SD Plan, CCA, Mission Bay Natural Resources Plan, Pacific Beach Community Plan and Local Coastal Plan, or BASASP and, as a result, cause an indirect or secondary environmental impact. However, Impacts would be less than significant, and no mitigation is required.

5.1.4.2 Conversion of Open Space or Farmland

Implementation of the project would not lead to the development or conversion of General Plan or Community Plan designated Open Space or Prime Farmland to a more intensive land use, resulting in a physical division of the community. No impact would occur.

5.1.4.3 Conflicts with the MSCP Subarea Plan

Implementation of the project would not conflict with the provisions of the City's MSCP SAP or other approved local, regional, or state Habitat Conservation Plan. No impact would occur.

5.1.4.4 Conflicts with an Adopted Airport Land Use Compatibility Plan

The project area is not located within the AIA of either the Montgomery-Gibbs Executive Airport or the San Diego International Airport; therefore, it would not be subject to either Airport Land Use Compatibility Plan (SDCRRA 2014). Implementation of the project would not result in land uses that are not compatible with an adopted ALUCP. No impact would occur.

5.1.5 Mitigation Framework

Impacts related to land use would be less than significant; therefore, no mitigation is required.

Source: City of San Diego 2014; SanGIS Imagery 2019.

N

0 500 1,000

Feet

Figure 5.1-1

General Plan Designations

De Anza Natural Amendment to the Mission Bay Park Master Plan

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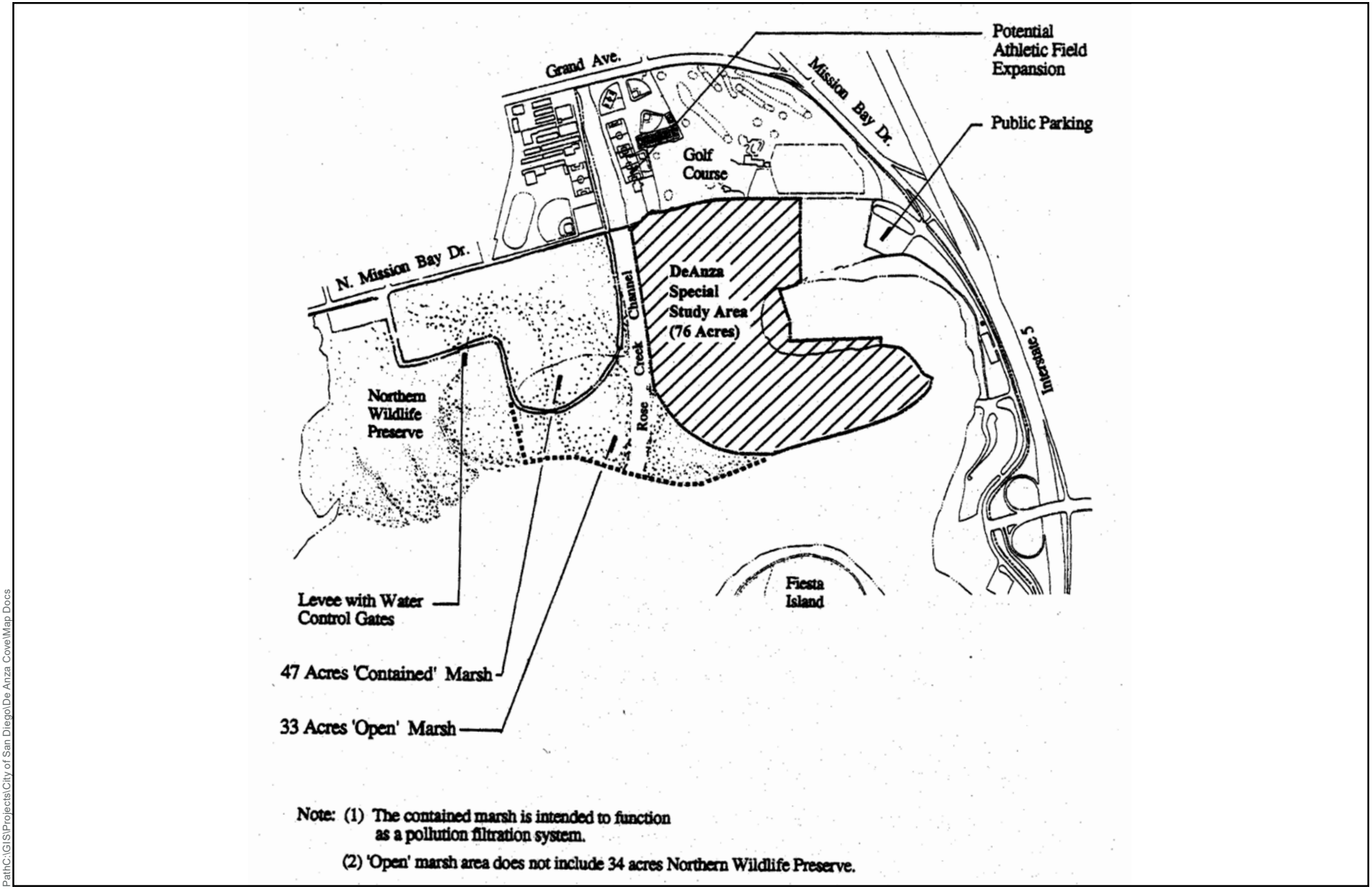

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Source: Dudek 2022.

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Figure 5.1-2

De Anza Special Study Area

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5.2 Air Quality and Odor

This section analyzes potential impacts related to air quality and odor that could result from the implementation of the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on a review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021) and MBPMP Environmental Impact Report (City of San Diego 1994), the Air Quality Technical Memorandum prepared by Harris & Associates (2023) (Appendix C), and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

5.2.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing conditions related to air quality (Section 2.3.2, Air Quality and Odor) and Chapter 4.0, Regulatory Framework (Section 4.2, Air Quality and Odor), for a discussion of relevant plans, policies, and regulations related to air quality. In summary, the project area is located within the San Diego Air Basin (SDAB) and is subject to the San Diego County Air Pollution Control District's (SDAPCD's) guidelines and regulations. The SDAB is currently classified as a federal non-attainment area for ozone (O_3) and a state non-attainment area for respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and O_3.

5.2.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.), the City's CEQA Significance Determination Thresholds (City of San Diego 2022), and applicable air district standards described below. A significant impact could occur if implementation of the project would:

1. Conflict with or obstruct the implementation of the applicable air quality plan;
2. Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
3. Expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants (TACs); or
4. Create objectionable odors affecting a substantial number of people.

5.2.2.1 San Diego County Air Pollution Control District

As part of its air quality permitting process, the SDAPCD has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. The SDAPCD sets forth quantitative emission thresholds below which a stationary source would not have a significant impact on ambient air quality. Project-related air quality impacts would be considered

significant if any of the applicable significance thresholds presented in Table 5.2-1, San Diego County Air Pollution Control District Air Quality Significance Thresholds, are exceeded.

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would or would not result in a significant impact to air quality.

Table 5.2-1. San Diego County Air Pollution Control District Air Quality Significance Thresholds

Construction Emissions			
Pollutant	**Total Emissions (pounds per day)**		
Respirable particulate matter (PM_{10})	100		
Fine particulate matter ($PM_{2.5}$)	67		
Oxides of nitrogen (NO_x)	250		
Oxides of sulfur (SO_x)	250		
Carbon monoxide (CO)	550		
Volatile organic compounds (VOC)	137[1]		
Operational Emissions			
	Total Emissions		
Pollutant	**Pounds per Hour**	**Pounds per Day**	**Tons per Year**
Respirable particulate matter (PM_{10})	—	100	15
Fine particulate matter ($PM_{2.5}$)	—	55	10
Oxides of nitrogen (NO_x)	25	250	40
Sulfur oxides (SO_x)	25	250	40
Carbon monoxide (CO)	100	550	100
Lead and lead compounds	—	3.2	0.6
Volatile organic compounds (VOC)	—	137[1]	13.7

Sources: City of San Diego 2022; SDAPCD 2020a.
Notes:
[1] VOC threshold based on the significance thresholds recommended by the Monterey Bay Unified Air Pollution Control District for the North Central Coast Air Basin, which has similar state attainment status as the SDAB for O_3.

The thresholds listed in Table 5.2-1 represent screening-level thresholds that can be used to evaluate whether project-related emissions would cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact.

According to the SDAPCD Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (SDAPCD 2022), a project is deemed to have a significant risk if the Health Risk Assessment shows that the off-site cancer risk exceeds 10 in 1 million or the noncancer chronic health hazard index exceeds 1.

SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of people or endangers the comfort, health, or safety of any person (SDAPCD 1976). A project that includes a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

5.2.2.2 City of San Diego

To determine the significance of the project's emissions on the environment, the City's Significance Determination Thresholds (City of San Diego 2022) were used. The City's thresholds are consistent with the thresholds contained in Appendix G of the CEQA Guidelines, with the addition of the following threshold:

> Release substantial quantities of air contaminants beyond the boundaries of the premises upon which the stationary source emitting the contaminants is located.[1]

The potential for the project to release substantial quantities of air contaminants under the aforementioned threshold is addressed in the analysis of the project-generated criteria air pollutant emissions, TAC emissions, and odors, as appropriate, in Section 5.2.3, Impact Analysis.

The SDAPCD Air Quality Significance Thresholds shown in Table 5.2-1 were used to determine the significance of project-generated construction and operational criteria air pollutants; specifically, the project's potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation (as assessed under Threshold Criterion 2). In regard to the analysis of potential impacts to sensitive receptors, the City specifically recommends consideration of sensitive receptors in locations such as daycare centers, schools, retirement homes, and hospitals, or medical patients in residential homes close to major roadways or stationary sources, which could be impacted by air pollutants. The City also states that the significance of potential odor impacts should be determined based on what is known about the quantity of the odor compounds that would result from the project's proposed uses, the types of neighboring uses potentially affected, the distances between the project's point sources and the neighboring uses such as sensitive receptors, and the resultant concentrations at the receptors (City of San Diego 2022).

The air quality section of the City's Significance Determination Thresholds recognizes attainment status designations for the SDAB and its non-attainment status for both ozone and particulate matter. As such, the document recognizes that, pursuant to CEQA, all new projects should include measures to reduce project-related ozone and particulate matter emissions to ensure that new development does not contribute to San Diego's non-attainment status for these pollutants.

5.2.3 Impact Analysis

5.2.3.1 Issue 1: Conflict with Air Quality Plan

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

As stated in Section 4.2, Air Quality and Odor, in Chapter 4.0, the SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the Clean Air Plans for

[1] San Diego Municipal Code, Chapter 14, Article 2, Division 7 — Off-Site Development Impact Regulations paragraph 142.0710 — Air Contaminant Regulations, which states, "Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the *premises* upon which the use emitting the contaminants is located" (added 12-9-1997 by O-18451 N.S.; effective 1-1-2000).

attainment and maintenance of the ambient air quality standards in the SDAB; specifically, the State Implementation Plan (SIP) and Regional Air Quality Strategy (RAQS).[2] The federal Ozone Maintenance Plan, which is part of the SIP, was adopted in 2012 and updated in 2020. The SIP includes a demonstration that current strategies and tactics will maintain acceptable air quality in the SDAB based on the National Ambient Air Quality Standards. The RAQS was initially adopted in 1991 and is updated on a triennial basis. The RAQS was most recently updated in 2016, and the 2022 RAQS is in progress. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. The SIP and RAQS rely on information from the California Air Resources Board (CARB) and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in San Diego County (County) and the cities in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile-source emission projections and SANDAG growth projections are based on population, vehicle trends, and land use plans developed by the County and the cities in the County as part of the development of their general plans.

If a proposed project involves development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality. The project falls within Mission Bay Park and, thus, is subject to the MBPMP (City of San Diego 2021). The project includes land uses that are consistent with the MBPMP, including natural areas, active recreation, and guest accommodations; see Figure 3-1, Site Plan. Therefore, the project is consistent with the existing zoning and underlying master plan for the site and would be consistent with the assumptions in the RAQS and SIP; see also Section 5.1, Land Use, for additional discussion of the project's consistency with the City's General Plan, MBPMP, and other relevant plans.

The project would also not include any growth-inducing features such as an increase in population or traffic. The project would result in a net decrease in traffic compared to existing conditions (Appendix L, Transportation Impact Analysis). Further, the project was envisioned in the growth projections and regional air quality strategies, and the project would not obstruct or impede implementation of local air quality plans. Based on the nature of the project, implementation would not result in development in excess of that anticipated in local plans or increases in population/housing growth beyond those contemplated by SANDAG. As such, vehicle trip generation and planned development for the project is anticipated in the SIP and RAQS. Because the proposed land uses and associated vehicle trips are anticipated in local air quality plans, the project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Impacts related to conflicts with applicable air quality plans would be less than significant.

[2] For the purpose of this discussion, the relevant federal air quality plan is the Ozone Maintenance Plan (SDAPCD 2020b). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the SDAB.

5.2.3.2 Issue 2: Air Quality Standards

Would the proposed project result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?

a. Construction Impacts

General Approach and Methodology

Construction of the project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance (grading), fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Fugitive dust (PM_{10} and $PM_{2.5}$) emissions would primarily result from grading and site preparation activities. NO_x and CO emissions would primarily result from the use of construction equipment and motor vehicles.

Project construction emissions were estimated using California Emissions Estimator Model (CalEEMod) version 2020.4.0. In order to analyze potential impacts associated with implementation of the project, assumptions were made regarding schedule, construction activities, and implementation of the project because these project details are not known at this time.

CalEEMod default assumptions for construction schedule and equipment were assumed based on the proposed land uses, and default vehicle trips for all phases except building construction and coating are assumed. Construction would begin in 2030 and include typical construction phases: demolition, site preparation, grading, building construction, paving, and architectural coating. Construction equipment assumed to be used includes industrial saws, excavators, graders, dozers, scrapers, tractors, loaders, backhoes, welders, forklifts, a crane, and an air compressor. Building construction and coating trips were overestimated for the project and were adjusted based on the amount of construction equipment and anticipated building area required for these phases. Soil movement would be balanced in the project area with no-net import or export. Haul trip length was reduced compared to the default model assumptions to represent on-site movement. Future grading and excavation quantities area currently unknown. Approximately 873,886 cubic yards of overall cut and fill is assumed based on previous construction assumptions and the proportional increase in proposed habitat restoration.

Construction of project components would be subject to the SDAPCD Rule 55, Fugitive Dust Control. This rule requires that construction of project components include steps to restrict visible emissions of fugitive dust beyond the property line (SDAPCD 2009). Compliance with Rule 55 would limit fugitive dust (PM_{10} and $PM_{2.5}$) that may be generated during grading and construction activities. Construction of project components would also be subject to SDAPCD Rule 67.0.1, Architectural Coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2015). The project would also be required to comply with the City's Municipal Code, Chapter 14, Article 2, Division 7, which prohibits air emissions that endanger human health from emanating beyond the boundaries of a project site. The proposed

construction equipment, vehicle trips, and construction phasing details for the project can be found in Appendix C.

Construction Emissions

Table 5.2-2, Estimated Maximum Daily Construction Emissions for the Project, shows the estimated maximum unmitigated daily construction emissions associated with the conceptual construction phases of the project. Complete details of the emissions calculations and outputs are provided in Appendix C.

Table 5.2-2. Estimated Maximum Daily Construction Emissions for the Project

Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Demolition	2	12	20	<1	2	1
Site Preparation	2	14	17	<1	10	5
Grading	4	29	34	<1	5	2
Building Construction	1	8	17	<1	<1	<1
Paving	1	4	16	<1	<1	<1
Architectural Coating	<1	1	2	<1	<1	<1
Maximum	*4*	*29*	*34*	*<1*	*10*	*5*
SDAPCD Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix C.
CO = carbon monoxide; NO_x = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego County Air Pollution Control District; SO_x = sulfur oxides; VOC = volatile organic compound

As shown in Table 5.2-2, daily construction emissions for the project would not exceed the City's Significance Thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$. Therefore, impacts associated with a violation of air quality standards would be less than significant during construction.

b. Operational Impacts

General Approach and Methodology

The project's operational impacts are based on the potential net change from existing conditions. Implementation of the project would result in less development than the current condition and would not result in an increase in operational activity compared to the existing site, including vehicle trips. Campland, including the Campland Cantina (casual sit-down eatery), along with Mission Bay RV Resort, would be removed as part of the project. There would be an overall reduction in guest accommodations, although the project would replace much of the low-cost visitor guest accommodations offered by Campland and Mission Bay RV Resort by offering new low-cost visitor guest accommodations. Existing mobile emissions are primarily generated from the low-cost visitor guest accommodations on site, which would be reduced under the proposed project. Mobile-source emissions would decrease due to a decreased customer base for the project compared to the existing baseline condition, as detailed in the project Transportation Impact Analysis (Appendix L); therefore, vehicle emissions are not included in operational emissions modeling, and a detailed analysis is not included herein. Similarly, the existing land uses currently require energy use, landscaping, and

routine painting and maintenance; however, future use estimates are not available for the project for these existing sources. It is assumed that the Campland area would be replaced primarily with upland and wetland habitat with an Interpretive Nature Center. Therefore, CalEEMod version 2020.4.0 was used to estimate operational emissions from future energy use and area sources. It is conservatively assumed that estimated emissions from these sources represent a net increase from existing conditions. The modeled land use was assumed to be an active park, with associated building area to represent boat facilities and other buildings. CalEEMod default energy use is assumed based on the selected land uses. The operational analysis contained herein is conservative, and actual net emissions of the project could be lower. Modeling assumes compliance with SDAPCD's Rule 67.0.1, Architectural Coatings, which governs the VOC content for interior and exterior coatings.

Operational Emissions

Table 5.2-3, Estimated Maximum Daily Operational Criteria Air Pollutant Emissions, presents the maximum daily emissions associated with the operation of the project. Complete details of the emissions calculations are provided in Appendix C.

Table 5.2-3. Estimated Maximum Daily Operational Criteria Air Pollutant Emissions

Emission Source	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total	<1	<1	<1	<1	<1	<1
Net Emissions (Project minus Baseline)	<1	<1	<1	<1	<1	<1
City Threshold	*137*	*250*	*550*	*250*	*100*	*55*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix C.
Notes: CO = carbon monoxide; NO_x = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SO_x = sulfur oxides; VOC = volatile organic compound

As shown in Table 5.2-3, maximum daily operational emissions would not exceed applicable thresholds for VOC, NO_x, CO, SO_x, PM_{10}, or $PM_{2.5}$ during the operation of the project.

5.2.3.3 Issue 3: Substantial Pollutant Concentrations

Would the proposed project expose sensitive receptors to substantial pollutant concentrations, including toxic air contaminants (TACs)?

a. Localized Carbon Monoxide Hotspots Impacts

Mobile-source impacts occur on two basic scales of motion. Regionally, project traffic would add to regional trip generation and increase the vehicle miles traveled within the local airshed and the SDAB. Locally, project traffic would be added to the City's roadway system, although there would be no net additional traffic because the project would result in less development than the current baseline

condition. When traffic occurs during periods of poor atmospheric ventilation, consists of a large number of vehicles "cold-started" and operating at pollution-inefficient speeds, and operates on already crowded roadways, there is a potential for the formation of microscale CO "hotspots" in the area immediately around points of congested traffic. Because of continued improvement in mobile emissions at a rate faster than vehicle growth and/or congestion, the potential for CO hotspots in the SDAB is steadily decreasing.

Projects contributing to adverse traffic impacts may result in the formation of CO hotspots. To verify that the project would not cause or contribute to a violation of the CO standard, a screening evaluation of the potential for CO hotspots was conducted. A project-specific Transportation Impact Analysis (Appendix L) was prepared to evaluate existing and project traffic and concluded that there would be a decrease in overall traffic in the project area due to less development, including reduced low-cost visitor guest accommodations and the replacement of Campland, including Campland Cantina, with expanded marshland habitat. As a result, there would be a reduction in the potential for the project to contribute to a CO hotspot compared to the current baseline condition. The project would result in a less than significant impact to sensitive receptors from exposure to substantial pollutant concentrations with regard to potential CO hotspots.

b. Toxic Air Contaminants

In addition to impacts from criteria pollutants, project impacts may include emissions of pollutants identified by the state and federal government as TACs or hazardous air pollutants. State law has established the framework for California's TAC identification and control project, which is generally more stringent than the federal project, and is aimed at TACs that are a problem in California. The state has formally identified more than 200 substances as TACs, including federal hazardous air pollutants, and adopts appropriate control measures for sources of these TACs. Currently, CARB has 26 mobile and stationary airborne toxic control measures.

The greatest potential for TAC emissions during construction would be diesel particulate matter (DPM) emissions from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. The closest sensitive receptors would be any receptor located directly adjacent to the project.

Health effects from carcinogenic air toxics are usually described in terms of cancer risk. The SDAPCD recommends an incremental cancer risk threshold of 10 in a million. "Incremental cancer risk" is the likelihood that a person continuously exposed to concentrations of TACs resulting from a project over a 70-year lifetime will contract cancer based on the use of standard risk assessment methodology.

Construction Health Risk Assessment

Operation of the project would not include any stationary sources of TACs and would not generate heavy-duty truck trips or other sources of mobile TACs, such as DPM. Therefore, the analysis of potential health risks from project implementation is focused on construction activities. In order to determine potential health risk associated with construction of the project, sensitive receptors were identified in proximity to the project construction areas. The project is adjacent to Mission Bay High

School to the north and residential neighborhoods to the north and west. The sensitive receptors are separated by North Mission Bay Drive/Pacific Beach Drive, which is about 30 feet wide.

Construction of the project would result in DPM emissions from heavy-duty construction equipment and trucks operating within the construction area. CARB characterizes DPM as a TAC. The State of California Office of Environmental Health Hazard Assessment (OEHHA) has identified carcinogenic and chronic noncarcinogenic effects from long-term (chronic) exposure, but it has not identified health effects due to short-term (acute) exposure to DPM (OEHHA 2015).

Cancer risk is defined as the increase in lifetime probability (chance) of an individual developing cancer due to exposure to a carcinogenic compound, typically expressed as the increased probability in 1 million. The cancer risk from inhalation of a TAC is estimated by calculating the inhalation dose in units of milligrams/kilogram body weight per day based on an ambient concentration in units of micrograms per cubic meter ($\mu g/m^3$), breathing rate, age-specific sensitivity factors, and exposure period, and multiplying the dose by the inhalation cancer potency factor, expressed as units of inverse dose (i.e., (milligrams/kilogram body weight per day)$^{-1}$). Typically, population-wide cancer risks are based on a lifetime (70 years) of continuous exposure, and an individual resident cancer risk is based on a 30-year exposure duration; however, exposure to construction emissions would be limited to the duration of construction. Therefore, the anticipated construction duration at the time of health risk modeling (approximately 5.75 years) was assumed. This is conservative compared to the CalEEMod estimated construction schedule, which assumes that the most intense phases of construction, demolition, and grading, when heavy-duty truck trips would be required, would occur for approximately 3 years.

Cancer risks are typically calculated for all carcinogenic TACs and summed to calculate the overall increase in cancer risk to an individual. The calculation procedure assumes that cancer risk is proportional to concentrations at any level of exposure and that risks from various TACs are additive. This is considered a conservative assumption at low doses and is consistent with the OEHHA recommended approach (OEHHA 2015).

The noncancer health impact of an inhaled TAC is measured by the hazard quotient, which is the ratio of the ambient concentration of a TAC in units of $\mu g/m^3$ divided by the reference exposure level (REL), also in units of $\mu g/m^3$. The inhalation REL is the concentration at or below which no adverse health effects are anticipated. The REL is typically based on health effects to a particular target organ system, such as the respiratory system, liver, or central nervous system. Hazard quotients are then summed for each target organ system to obtain a hazard index.

To estimate the ambient DPM concentrations resulting from construction activities at nearby sensitive receptors, a dispersion modeling analysis was performed using the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) version 9.6.1 in conjunction with the Hotspots Analysis and Reporting Program Version 2 (HARP 2). CARB developed HARP 2 as a tool to implement the risk assessments and incorporates all the requirements provided by the OEHHA as outlined in the Air Toxics Hot Spot Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015). The modeling effort is conservative because it does not take into account increases in fuel emissions standards that would reduce emissions exposure in later construction years. Refer to Appendix C for detailed methodology and assumptions. In addition

to the potential cancer risk, DPM has chronic (i.e., long-term) noncarcinogenic health impacts. The chronic hazard index was evaluated using the OEHHA inhalation RELs. The chronic noncarcinogenic inhalation hazard index for construction activities was also calculated using the HARP 2 Air Dispersion Modeling and Risk Tool.

Diesel Particulate Matter Concentrations, Cancer Risk, and Chronic Hazard

The results of the AERMOD and HARP 2 modeling are provided in Appendix C. The modeled maximum annual concentration at the maximally exposed individual resident (MEIR) would be 0.015 µg/m^3. The associated cancer risk for the child MEIR (exposure starting in third trimester) would be approximately 7.22 in 1 million, which would not exceed the SDAPCD's significance threshold of 10 in 1 million for cancer impacts. The associated chronic hazard index for the child MEIR would be approximately 0.003, which would not exceed the SDAPCD's significance threshold of 1.0 for noncarcinogenic health impacts. Detailed information on the Health Risk Assessment is provided in Appendix C.

Based on these considerations, the project would result in a less than significant impact to sensitive receptors from exposure to substantial pollutant concentrations with regard to potential TACs.

5.2.3.4 Issue 4: Odors

Would the proposed project create objectionable odors affecting a substantial number of people?

The California Health and Safety Code, Division 26, Part 4, Chapter 3, Section 41700, and SDAPCD Rule 51, commonly referred to as "public nuisance law," prohibit emissions from any source in quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. Projects required to obtain permits from the SDAPCD are evaluated by SDAPCD staff for potential odor nuisance, and conditions may be applied (or control equipment required) where necessary to prevent occurrence of public nuisance.

Chapter 14, Article 2, Division 7, paragraph 142.0710, Air Contaminant Regulations, of the City's Municipal Code states, "Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the *premises* upon which the use emitting the contaminants is located." SDAPCD Rule 51, Public Nuisance, also prohibits emission of any material that causes nuisance to a considerable number of people or endangers the comfort, health, or safety of any person. A project involving a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors. Although localized air quality impacts are focused on potential impacts to sensitive receptors, such as residences and schools, other land uses where people may congregate (e.g., workplaces) or uses with the intent to attract people (e.g., restaurants and visitor-serving accommodations), should also be considered in the evaluation of potential odor nuisance impacts. Odor issues are subjective by the nature of odors and due to the fact that their measurements are difficult to quantify. As a result, this guideline is qualitative and focuses on existing and potential surrounding uses and location of sensitive receptors.

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the project. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. The project is adjacent to and just south of Mission Bay High School and residential developments. However, due to the temporary nature of construction, nearby sensitive receptors would only be intermittently exposed to any short-term odors produced by construction activities within the project area.

Examples of land uses and industrial operations that are commonly associated with odor complaints include agricultural uses, wastewater treatment plants, food processing facilities, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. In addition to the odor source, the distance between the sensitive receptors and the odor source and the local meteorological conditions are considerations in the potential for a project to frequently expose the public to objectionable odors. Operation of the project would not include any land uses or industrial operations that are commonly associated with odor complaints. Upon completion of construction, project land uses would include natural habitat, low-cost visitor guest accommodations, parkland, and active and passive recreational opportunities. These land uses are not typically associated with nuisance odors. Therefore, impacts from odors would be less than significant.

5.2.4 Significance of Impacts

5.2.4.1 Conflict with Air Quality Plan

The project land uses and associated vehicle trips are anticipated in local air quality plans; therefore, the project would be consistent at a regional level with the underlying growth forecasts in the RAQS. Impacts would be less than significant, and no mitigation is required.

5.2.4.2 Air Quality Standards

The project would not exceed the SDAPCD significance thresholds during construction or operation. Therefore, impacts would be less than significant, and no mitigation is required.

5.2.4.3 Substantial Pollutant Concentrations

The project would not create a CO hotspot during construction or operation. TAC emissions during construction would not result in exposure of sensitive receptors to substantial pollutant concentrations that would exceed the SDAPCD significance thresholds. Therefore, impacts would be less than significant, and no mitigation is required.

5.2.4.4 Odors

The project does not include land uses associated with generation of objectionable odors. Further, the SDAPCD prohibits the emission of any material that causes a nuisance to a considerable number of people or endangers the comfort, health, or safety of the public. Therefore, impacts would be less than significant, and no mitigation is required.

5.2.5 Mitigation Framework

Impacts to air quality would be less than significant; therefore, no mitigation is required.

5.3 Biological Resources

This section analyzes potential impacts related to biological resources that could result from implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan and associated discretionary actions (project). The information in this section is based on a review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021a) and MBPMP Environmental Impact Report (City of San Diego 1994), the Biological Resources Technical Report prepared by Harris and Associates (Appendix D), the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022), the City's Biology Guidelines (SDBG) (City of San Diego 2018), the City's Final Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) (City of San Diego 1997), and other applicable documents and data sources described below.

5.3.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing biological resources (Section 2.3.3, Biological Resources) and Chapter 4.0, Regulatory Framework (Section 4.3, Biological Resources), for a discussion of relevant plans, policies, and ordinances related to biological resources. In summary, 13 vegetation communities and/or land cover types have been identified within the project area. The SDBG identifies vegetation communities, land cover types, and wetlands with designations of Tier I through V and wetlands (City of San Diego 2018). The sensitive vegetation and wetland communities within the project area include disturbed wetland (Arundo) (wetlands), disturbed freshwater marsh (wetlands), southern coastal salt marsh (wetlands), open water (wetlands), eelgrass beds (wetlands), tidal channel (wetlands), salt panne (wetlands), mudflat (wetlands), southern foredunes (Tier I), and Diegan coastal sage scrub (Tier II) (City of San Diego 2018). One non-native vegetation community, non-native grassland (Tier IIIB), and two land cover types, disturbed land (Tier IV) and developed land (Tier IV), are mapped within the project area (City of San Diego 2018). In addition, a total of 219.49 acres of potentially jurisdictional wetlands and non-wetland waters occurs in the project area.

Four sensitive plant species were detected in the project area including Palmer's frankenia (*Frankenia palmeri*), San Diego marsh-elder (*Iva hayesiana*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), and California seablite (*Suaeda californica*). Two sensitive plant species, estuary seablite (*Suaeda esteroa*) and Nuttall's acmispon (*Acmispon prostratus*), were determined to have a high potential to occur in the project area but were not identified during the biological resources surveys.

A total of 27 sensitive wildlife species were observed in the project area including American peregrine falcon (*Falco peregrinus anatum*), Belding's Savannah sparrow (*Passerculus sandwichensis beldingi*), black skimmer (*Rynchops niger*), black tern (*Chlidonias niger*), brant (*Branta bernicla*), California brown pelican (*Pelecanus occidentalis californicus*), California gull (*Larus californicus*), California horned lark (*Eremophila alpestris actia*), California least tern (*Sternula antillarum browni*), Caspian tern (*Hydroprogne*

caspia), Clark's marsh wren (*Cistothorus palustris clarkae*), common loon (*Gavia immer*), Cooper's hawk (*Accipiter cooperii*), Costa's hummingbird (*Calypte costae*), double-crested cormorant (*Phalacrocorax auritus*), elegant tern (*Thalasseus elegans*), light-footed Ridgway's rail (*Rallus obsoletus levipes*), long-billed curlew (*Numenius americanus*), monarch butterfly (*Danaus plexippus*), northern harrier (*Circus hudsonius*), osprey (*Pandion haliaetus*), reddish egret (*Egretta rufescens*), redhead (*Aythya americana*), rufous hummingbird (*Selasphorus rufus*), Southern California legless lizard (*Anniella stebbinsi)*, wandering skipper (*Panoquina errans*), and white-tailed kite (*Elanus leucurus*). Two sensitive wildlife species, including northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*) and Mexican long-tongued bat (*Choeronycteris mexicana*), were determined to have a high potential to occur in the project area but were not observed during the biological resources surveys.

5.3.2 Significance Determination Thresholds

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022) and Appendix G of the CEQA Guidelines, which have been adapted to guide a programmatic analysis for the project, potential impacts on biological resources would be significant if the project would result in:

1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP Subarea Plan (SAP)or other local or regional plans, policies or regulations, or by CDFW [California Department of Fish and Wildlife] or USFWS [U.S. Fish and Wildlife Service];
2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS;
3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites;
5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan, either within the MSCP SAP area or in the surrounding region;
6. Introducing land use within an area adjacent to the MHPA [Multi-Habitat Planning Area] that would result in adverse edge effects;
7. Conflict with any local policies or ordinances protecting biological resources; or
8. An introduction of invasive species of plants into natural open space area.

5.3.2.1 Direct Impacts

A direct impact is a physical change in the environment that is caused by and immediately related to the project. Construction and restoration activities associated with implementation of the project could result in direct impacts to biological resources including but not limited to the following:

- Direct removal of vegetation and/or land cover during construction activities by means of excavation, demolition, grading, vegetation clearing/grubbing/crushing
- Placement of fill/sediment within jurisdictional aquatic resources, including Mission Bay

- Dredging and/or hydrologic restoration activities in jurisdictional resources and encroachment into wetland buffers
- Human incursion into sensitive habitats
- Mortality of sensitive wildlife species from vehicular collision
- Destruction or abandonment of nests

Lands containing Tier I, II, IIIA, and IIIB (Table 3 from the SDBG) and all wetlands (Tables 2A and 2B from the SDBG) are considered sensitive and declining habitats (Table 5.3-1, Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources). As such, impacts to these resources would be considered significant, with two exceptions (City of San Diego 2022):

a. If the total proposed project upland impacts affect less than 0.1 acre, then they would not be considered significant and would not require mitigation.
b. Any proposed project impacts to non-native grasslands totaling less than 1 acre that are completely surrounded by urban development would not be considered significant and would not require mitigation.

Lands designated as Tier IV (e.g., developed land) are not considered to have significant habitat value, and any proposed impacts to these communities would not be considered significant.

Since the project area is entirely within the Coastal Overlay Zone (COZ), any impacts to wetlands as part of the project would be considered significant.

Table 5.3-1. Significance of Potential Impacts to Vegetation Communities and Jurisdictional Resources

Resource Type	Impact Threshold	Significance of Impact
Native Uplands (Tier I, II, IIIA, or IIIB)	Less than 0.1 acre	Not significant
	0.1 acre or greater	Significant, requires mitigation
Non-Native Grassland (Tier IIIB)	Less than 1 acre in an urban setting	Not significant
	1 acre or greater in an urban setting	Significant, requires mitigation
Disturbed and Developed Land (Tier IV)	Any impacts	Not significant
Jurisdictional Waters	Any impacts within the COZ	Significant, requires mitigation
Wetlands	Any impact within the COZ	Significant, requires mitigation

Source: Appendix D.
Notes: COZ = Coastal Overlay Zone

Impacts to individual sensitive plants species, aside from impacts to sensitive habitat, may also be considered significant based upon the rarity and extent of impacts. In general, conformance with the MSCP SAP provides incidental take coverage for covered species (both plants and wildlife) such that impacts to those species outside the City's MHPA would not be considered significant (due to conservation of the species provided by MSCP SAP implementation). Exceptions to this would be impacts that occur to narrow endemic covered species, non-covered species that are state- or federally listed species and/or have a California Rare Plant Rank (CRPR) of 1B.1, 1B.2, or 2B.2 or to covered species that are within the MHPA (City of San Diego 2018). If avoidance or minimization of

impacts is not feasible, any direct impacts to sensitive plant species that do not have incidental take coverage through the MSCP SAP could be mitigated through either the habitat restoration of the marshland in Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP) or through on-site preservation of species in the restored marshland habitat that is within the MHPA boundary. Further, implementation of Area-Specific Management Directives (ASMDs) for certain species covered under the MSCP SAP would be required as conditions of future site-specific project approval. Impacts to plant species ranked CRPR 3 and 4 would not be considered significant since any populations identified on site would not represent a significant percentage of the population in terms of the ability for the species to persist (i.e., CRPR 4 species are not considered "rare" from a statewide perspective) (Table 5.3-2, Significance of Potential Impacts to Sensitive Plant Species).

Table 5.3-2. Significance of Potential Impacts to Sensitive Plant Species

Species Rarity	Location of Species	Significance of Impact
MSCP covered species	Any	Significant, requires mitigation
MSCP Narrow Endemic	Any	Significant, requires mitigation
Federally or State Listed	Any	Significant, requires mitigation
CRPR 1B.1, 1B.2, and 2B.2	Any	Significant, requires mitigation
CRPR 3 and 4	Any	Not significant

Source: Appendix D.

Notes: CRPR = California Rare Plant Rank; MSCP = Multiple Species Conservation Program; SAP = City of San Diego Multiple Species Conservation Program Subarea Plan

The City's permit to "take" covered species under the MSCP SAP is based on the concept that approximately 90 percent of lands within the MHPA will be preserved. The only activities within the MHPA proposed as part of the project would be limited to restoration and enhancement activities associated with establishing marshland habitat in the previous soil disposal site in KFMR/NWP and the treatment of invasive species in the City-owned sections of the preserve; these activities are allowed within the MHPA (City of San Diego 1997). Therefore, no MHPA boundary line adjustments are anticipated. However, the City may process a Boundary Line Adjustment to propose inclusion of natural habitat restoration areas to be added to the MHPA as part of a future implementation action.

Restoration and enhancement activities conducted in both the KFMR/NWP and the existing Campland site would be consistent with the requirements in the City's MSCP SAP, the SDBG, and the Environmentally Sensitive Lands regulations for conducting such activities in wetlands and wetland buffers located in both the MHPA and COZ. Further, consistent with the MSCP SAP, the project would implement the ASMDs for species covered under the MSCP SAP that occur or have a high potential to occur in the project area, as applicable. The project would also result in long-term direct benefits to wetland habitat and wildlife species that use these areas within and adjacent to the MHPA and COZ through the restoration and expansion of marshland on the KFMR/NWP and on previously developed land on the existing Campland site. In addition, these restoration and enhancement activities were envisioned as part of the project, in accordance with the MBPMP. The project also supports implementation of Sections 1.5.1 and 1.5.2 of the City's MSCP SAP, regarding preservation and restoration of viable sensitive biological resources, including wildlife habitat.

5.3.2.2 Indirect Impacts

Indirect impacts are reasonably foreseeable effects caused by project implementation on remaining or adjacent biological resources outside a direct impact area, such as downstream and adverse edge effects. Indirect impacts include short-term effects immediately related to construction/installation activities and long-term or chronic effects occurring after construction. Indirect impacts that would result in loss of area or function of wetlands, Tier I–III upland vegetation habitats, or sensitive species may be considered significant.

Additional potential short-term indirect impacts to biological resources that could occur from the proposed project are related to overall project construction activities and may include dust, construction-related noise, hydroacoustic effects, siltation, general human presence, changes within Mission Bay and Rose Creek that affect forage and nesting, and construction-related soil erosion and runoff. Potential long-term indirect impacts to biological resources may also occur as a result of the project through adverse edge effects, including introduction of non-native species and increased human presence during and following construction. Since the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the KFMR/NWP, it is required to demonstrate consistency with the MSCP SAP Section 1.4.3, Land Use Adjacency Guidelines (LUAGs). The project would also result in long-term indirect benefits to wetland habitat and wildlife species that use these areas within and adjacent to the MHPA and COZ through the restoration and expansion of marshland on the KFMR/NWP and on previously developed land on the existing Campland site. For typical development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained.

In accordance with the MSCP SAP and pursuant to the San Diego Regional Water Quality Control Board (RWQCB) Municipal Permit and the City's Stormwater Standards Manual (City of San Diego 2021b), projects are required to implement site design, source control, and treatment control best management practices (BMPs) to reduce potential indirect impacts to sensitive biological resources. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D. Development projects would be required to meet National Pollutant Discharge Elimination System (NPDES) regulations and incorporate BMPs during construction and permanent BMPs as defined by the City's Stormwater Standards Manual as part of project development.

5.3.3 Impact Analysis

5.3.3.1 Issue 1: Sensitive Species

Would the proposed project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP Subarea Plan (SAP)or other local or regional plans, policies or regulations, or by CDFW or USFWS?

a. Sensitive Plant Species

Direct Impacts

Four sensitive plant species were observed within the project area during biological surveys: California seablite, Palmer's frankenia, San Diego marsh-elder, and southwestern spiny rush. Two additional sensitive plant species, estuary seablite and Nuttall's acmispon, were determined to have a high potential to occur in the project area. These sensitive plant species observed or with a high potential to occur in the project area are not designated as narrow endemic or covered under the MSCP SAP.

Observations of, and potentially suitable habitat for, San Diego marsh-elder, southwestern spiny rush, and Nuttall's acmispon are located outside the project's potential impact area within the KFMR/NWP (Figure 5.3-1, Impacts to Biological Resources – Proposed Project). Therefore, no impacts to these sensitive plant species are expected to occur from implementation of the project.

There is potential for California seablite, Palmer's frankenia, and estuary seablite to occur in the project construction, enhancement, and hydrologic restoration areas that include these species' suitable habitat, the KFMR/NWP. In the event these sensitive plant species are identified within the potential impact area, direct impacts are considered potentially significant.

An analysis of the exact acreage of impacts that would occur to these sensitive plant species in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to sensitive plant species would be avoided, minimized, or mitigated as conditions of subsequent project approval prior to the implementation of the future site-specific projects.

Indirect Impacts

Temporary indirect impacts to sensitive plant species could result during construction of the proposed project, and may include dust, which could disrupt plant vitality in the short term, or construction-related soil erosion and runoff. Permanent edge effects could result during operation of the proposed project and may include intrusions by humans and domestic pets and therefore possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). The project is required to comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines are demonstrated in Table 4, Proposed Project Consistency Determination with Multiple Species Conservation Program Subarea Plan General Management Directives and Area-Specific Management Directives, and Table 5, Multiple Species Conservation Program Subarea Plan General Planning Policies and Design Guidelines Consistency Analysis, of Appendix D. In addition, because the proposed project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it is required to demonstrate

consistency with the MSCP SAP Section 1.4.3. The project's consistency with the MHPA LUAGs is demonstrated in Table 6, Project Consistency Determination with Multi-Habitat Planning Area Land Use Adjacency Guidelines, in Appendix D. Consistency with the MHPA LUAGs ensures minimization of adverse edge effects from implementation of the proposed project. Therefore, indirect impacts to sensitive plants during construction activities and operation of the project are considered less than significant.

b. Sensitive Wildlife Species

Direct Impacts

The 27 sensitive wildlife species that were observed in the project area during surveys or were determined to have high potential to occur in the project area. The project has the potential to directly impact these species during construction activities and operation of the project through displacement of individual wildlife or elimination of portions of their habitat (Figure 5.3-1). In addition, some of the smaller species, such as reptiles and rodents, could be killed or injured by clearing, grading, and other construction activities. Implementation of the project would result in both permanent and temporary direct loss of habitat, including nesting, roosting, and foraging habitat, for the majority of the sensitive wildlife species observed or with a high potential to occur in the project. These sensitive wildlife species observed or with high potential to occur include the following: American peregrine falcon, Belding's savannah sparrow, black skimmer, black tern, brant, California brown pelican, California gull, California horned lark, California least tern, Caspian tern, Clark's marsh wren, common loon, Cooper's hawk, Costa's hummingbird, double-crested cormorant, elegant tern, light-footed Ridgway's rail, long-billed curlew, monarch butterfly, northern harrier, osprey, reddish egret, redhead, rufous hummingbird, Southern California legless lizard, wandering skipper, and white-tailed kite. Of the 27 sensitive wildlife species observed in the project area during surveys conducted in 2016 and 2018, six species, Belding's savannah sparrow, California brown pelican, California gull, osprey, double-crested cormorant, and monarch butterfly, were confirmed present during the 2022 biological surveys. In addition, two sensitive wildlife species, Mexican long-tongued bat and northwestern San Diego pocket mouse, were not observed but were determined to have a high potential to occur in the project area.

Of these 27 sensitive wildlife species observed or determined to have a high potential to occur, nine are covered by the MSCP SAP. These species include American peregrine falcon, Belding's savannah sparrow, California brown pelican, California least tern, Cooper's hawk, light-footed Ridgway's rail, northern harrier, reddish egret, and wandering skipper butterfly. The MSCP SAP requires ASMD for six of the nine sensitive wildlife species covered under the plan, including Belding's savannah sparrow, California least tern, Cooper's hawk, light-footed Ridgway's rail, northern harrier, and wandering skipper butterfly. ASMDs are not required for American peregrine falcon, California brown pelican, or reddish egret (City of San Diego 1997). Conformance with the MSCP SAP provides incidental take coverage for covered species such that impacts to those species outside the City's MHPA would not be considered significant (due to conservation of the species provided by MSCP SAP implementation). Further, implementation of ASMDs for applicable MSCP SAP covered sensitive wildlife species that occur in the project area would be required as a condition of project approval. Therefore, with conformance with the MSCP SAP and the species-specific ASMD as applicable, direct impacts to these nine sensitive wildlife species are considered less than significant.

Similarly, white-tailed kite is a CDFW fully protected species, and the California Endangered Species Act (CESA) does not allow take of fully protected species. Furthermore, as a condition of site-specific project

approval, the project would be required to avoid impacts to this species consistent with CESA. Therefore, with conformance with CESA, direct impacts to white-tailed kite would be less than significant, and no mitigation is required.

Potential direct impacts to the 17 sensitive wildlife species observed or determined to have a high potential to occur that are not covered by the MSCP SAP or fully protected under CESA are discussed below. An analysis of the exact acreage of impacts that would occur to these sensitive wildlife species in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to these sensitive wildlife species would be avoided, minimized, or mitigated as conditions of project approval prior to the implementation of the future site-specific projects.

Approximately 219.49 acres of aquatic and wetland vegetation communities and land cover types occur in the project area and provide suitable nesting and foraging habitat for sensitive bird and raptor species (not covered by the MSCP SAP) observed using these habitats in the project area. These observed species include redhead, brant, Costa's hummingbird, black tern, common loon, Caspian tern, California gull, long-billed curlew, double-crested cormorant, black skimmer, rufous hummingbird, and elegant tern.

The 0.02 acre of disturbed wetland (Arundo) and 0.38 acre of disturbed freshwater marsh that occur along Rose Creek and within the Mission Bay Tennis Center, Athletic Fields, and Golf Course (MBTAG) in the central and northeastern portions of the project area, respectively, may be limited or low-quality, but these communities provide some suitable foraging habitat for sensitive bird species due to their proximity to the ornamental trees within Campland and the MBTAG that may provide suitable nesting habitat for these species. Further, common species of waterfowl, including mallard ducks (*Anas platyrhynchos*) and greater white-fronted geese (*Anser albifrons*), were observed congregating around the artificial water features of the MBTAG adjacent to the disturbed wetland (Arundo) and disturbed freshwater marsh, indicating the potential use of these areas as foraging habitat by sensitive waterfowl observed in the project area as well, including redhead. Direct impacts to disturbed wetland (Arundo) and disturbed freshwater marsh could result in direct impacts to these sensitive birds in the form of permanent and temporary habitat loss. Potential impacts to these sensitive wildlife species are considered potentially significant (**Impact 5.3-1**).

The 45.64 acres of southern coastal salt marsh and 35.84 acres of salt panne/mudflat that occur within the KFMR/NWP in the western portion of the project area provide suitable nesting and foraging habitat for sensitive wildlife species observed in the project area. Specifically, the marsh and mudflats that occur in the western portion of the project area provide suitable foraging habitat for sensitive long-billed curlew. Direct impacts to southern coastal salt marsh and salt panne/mudflat could result in direct impacts to sensitive wildlife species in the form of permanent and temporary habitat loss. Potential impacts to sensitive wildlife species are considered potentially significant (**Impact 5.3-1**).

Approximately 107.12 acres of open water and 2.57 acres of tidal channel occur in the project area and provide suitable foraging habitat for many of the sensitive wildlife species observed in the project area. These species include redhead, brant, black tern, Caspian tern, California gull, double-crested cormorant, black skimmer, and elegant tern. Specifically, the approximately 83.74 acres of eelgrass

beds that occur as the substrate of much of the open water of the project area provides suitable foraging habitat for sensitive redhead, brant, and double-crested cormorant observed in the project area. Direct impacts to open water, tidal channel, and eelgrass beds could result in direct impacts to these sensitive birds in the form of permanent and temporary habitat loss. Potential impacts to these sensitive wildlife species are considered potentially significant (**Impact 5.3-1**).

Although the vegetated upland habitats, including 1.35 acres of southern foredunes, 2.38 acres of Diegan coastal sage scrub, and 0.04 acre of non-native grassland, in the project area are limited to the northwestern and western edges, these communities provide suitable foraging habitat for sensitive wildlife species observed or with a high potential to occur in the project area. The sensitive wildlife species potentially supported by these upland communities include Costa's hummingbird, rufous hummingbird, and potentially occurring Blainville's horned lizard and Northwestern San Diego pocket mouse. In addition, the southern foredunes provide limited suitable habitat for Southern California legless lizard. Direct impacts to southern foredunes, Diegan coastal sage scrub, and non-native grassland could result in direct impacts to these sensitive wildlife species in the form of permanent and temporary habitat loss. Potential impacts to these sensitive wildlife species are considered potentially significant (**Impact 5.3-1**).

The 3.40 acres of disturbed habitat and 222.71 acres of developed land throughout the project area provides little to no suitable habitat value for the sensitive species observed or with a high potential to occur in the project area. However, a large number of ornamental trees are present within and along the edges of the developed land of Campland, De Anza Cove, and the MBTAG that could provide suitable nesting habitat for birds, including Costa's hummingbird and rufous hummingbird. The proposed project is required to comply with all federal, state, and local regulations applicable to biological resources, including the California Fish and Game Code (CFGC) and Migratory Bird Treaty Act (MBTA), which protect sensitive nesting birds. Implementation is ensured through conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential direct impacts to these sensitive wildlife species would be potentially significant (**Impact 5.3-1**).

The abandoned structures and mobile homes within De Anza Cove provide suitable bat roosting habitat, specifically for Mexican long-tongued bat which was determined to have a high potential to occur in the project area. Direct impacts to the developed land in the project area, particularly the structures that provide potential bat roosting habitat in Campland and De Anza Cove, could result in direct impacts to roosting bats, specifically Mexican long-tongued bat, in the form of permanent and temporary habitat loss. Potential direct impacts to these sensitive wildlife species are considered potentially significant (**Impact 5.3-1**).

Adult monarch butterflies were observed flying through the project area during the 2022 surveys. However, no milkweed patches, the monarch caterpillar host plant, were observed on the project area. Pine and eucalyptus trees that are present in and along the edges of the developed land of Campland, De Anza Cove, and the MBTAG provide potentially suitable overwintering habitat for monarch butterfly. Direct impacts to the mature trees in the developed land of the project area, including Campland, De Anza Cove, and the MBTAG, could result in direct impacts to monarch butterfly in the form of permanent and temporary overwintering habitat loss. Potential impacts to this sensitive species are considered potentially significant (**Impact 5.3-1**).

Indirect Impacts

Temporary construction-related and long-term operational indirect impacts to wildlife generally include lighting, increased human activity, hydrologic quality (increased turbidity, excessive sedimentation, flow interruptions, and changes in water temperature), noise, vibration, and trash and garbage, which can attract both introduced terrestrial and native terrestrial and avian predators (such as American crows [*Corvus brachyrhynchos*], common ravens [*Corvus corax*], coyotes [*Canis latrans*], domestic dogs [*Canis familiaris*], raccoons [*Procyon lotor*], and striped skunks [*Mephitis mephitis*]). These indirect impacts in the form of habitat disturbance and potential predation could have a significant impact on the sensitive wildlife species observed or determined to have a high potential to occur in the project area. The project would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines are demonstrated in Tables 4 and 5 in Appendix D. In addition, because the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. Consistency with the MHPA LUAGs ensures minimization of adverse edge effects from implementation of the proposed project. Therefore, indirect impacts to sensitive wildlife during construction activities and operation of the proposed project are considered less than significant.

Proposed project construction activities within the waters of Mission Bay could result in the generation of sound exposure levels (SEL) high enough to cause hydroacoustic effects on these marine species, including marine fish, marine mammals, and green sea turtles, with potential to occur in the project area (Merkel & Associates 2017). Table 5.3-3, Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts, provides the estimated hydroacoustic impact thresholds for marine species with potential to occur in the proposed project area.

Table 5.3-3. Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts

Impact Threshold Type	SEL Impact Threshold for Marine Fish (dB)[1]	SEL Impact Threshold for Marine Mammals (dB_{rms})[1]	SEL Impact Threshold for Green Turtles (dB_{rms})[1]
Peak	206	—	—
Accumulated[2]	187	—	—
Impact	—	160	166
Vibratory	—	120	166

Source: Appendix D.
Notes: dB = decibels; dB_{rms} = decibel root mean square; SEL = sound exposure level
[1] Source: Merkel & Associates 2017.
[2] Accumulated SEL is derived from the number of pile strikes ($SEL_{cumulative}$ = SEL + 10*log[#strikes) as such, the starting SEL would dictate the number of pile strikes possible prior to exceeding the threshold of 187dB $SEL_{cumulative}$.

The potential indirect impacts to sensitive marine wildlife species from the exposure of high sound and vibration levels are considered potentially significant (**Impact 5.3-1**).

Nesting Birds

As previously discussed, the project area provides suitable nesting habitat for sensitive birds and raptors protected under the CFGC and MBTA. Although no active nests or nesting behavior were observed during any of the biological surveys, focused nest surveys were not conducted due to the programmatic nature of the project.

As previously discussed under Direct Impacts, the proposed project is required to implement regulations protecting sensitive nesting birds and raptors, including the CFGC and MBTA. Implementation is ensured through conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, indirect impacts to nesting birds and raptors occurring in the project area would be potentially significant, and mitigation is required (**Impact 5.3-1**).

Roosting Bats

As previously discussed, suitable roosting habitat for sensitive bat species, including Mexican long-tongued bat, hoary bat, western red bat, and western yellow bat, occurs in the structures and ornamental trees within the developed land of Campland, De Anza Cove, and the MBTAG in the central and eastern portions of the project area. Although roosting bats were not observed during the biological surveys, no focused nighttime mist-netting or acoustic surveys were conducted and the availability of suitable roosting with nearby foraging habitat suggest roosting is likely occurring in the project area. The majority of the land uses currently in the MBTAG would remain in place, and no impacts would result to the potential roosting habitat provided by the trees that area. Direct impacts to the developed land in the project area, particularly removal of the structures and ornamental trees in Campland and De Anza Cove, could result in direct impacts to sensitive bats in the form of permanent and temporary roosting habitat loss. Potential indirect impacts to sensitive roosting bat species during construction and tree removal would be potentially significant (**Impact 5.3-1**).

Impact 5.3-1 The proposed project could have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in the MSCP SAP or other local or regional plans, policies or regulations, or by CDFW or USFWS.

5.3.3.2 Issue 2: Sensitive Habitats

Would the proposed project result in a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

A total of 13 vegetation communities and/or land cover types occur in the project area (that cover a total of 505.2 acres). Construction of the project could result in potential impacts to 11 sensitive vegetation communities. As previously mentioned, the entire project area is within the COZ.

Of the total project area, approximately 91.17 acres are located within the MHPA boundary. Direct impacts would occur within the MHPA boundary in the KFMR/NWP from the restoration of disturbed land to marshland habitat and from the implementation of hydrologic restoration activities, which would include trenching of tidal channels to ensure that sufficient tidal influence reaches in the newly

established marshland habitat to allow it to establish and be sustainable long-term. Additional short-term direct impacts within the MHPA may also occur from enhancement activities (e.g., hand removal of invasive species).

The potential direct impacts to sensitive vegetation communities and land cover types within each of the proposed project areas (KFMR/NWP, Existing Campland, MBTAG, and De Anza Cove) are described in the following subsections. An analysis of the exact acreage of impacts that would occur to the sensitive vegetation communities in the project area as a result of the project is not provided at the programmatic level as such analysis would be speculative in nature as future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project and any impacts to sensitive vegetation communities would be avoided, minimized, or mitigated as conditions of project approval prior to the implementation of the future site-specific projects.

a. Kendall-Frost Marsh Reserve/Northern Wildlife Preserve Area

Implementation of the project, which includes restoration of marshland habitat within existing disturbed land and enhancement and hydrologic restoration activities in the KFMR/NWP, could potentially result in up to 87.74 acres of direct impacts to southern coastal salt marsh, salt panne, mudflats, eelgrass beds, open water, tidal channel, Diegan coastal sage scrub, southern foredunes, and disturbed land that occurs in the KFMR/NWP. Implementation of marshland and hydrologic restoration activities that result in impacts to southern coastal salt marsh, salt panne, mudflats, open water, or tidal channels, which are all considered wetlands by the SDBG (City of San Diego 2018), are considered potentially significant without mitigation. Similarly, southern foredunes (Tier I) and Diegan coastal sage scrub (Tier II) are considered sensitive vegetation communities by the SDBG (City of San Diego 2018), and impacts would be potentially significant (**Impact 5.3-2**).

Potential impacts to disturbed and developed land from proposed activities associated with expansion of marshland habitat within KFMR/NWP would not be significant, and no mitigation would be required since disturbed and developed land are both considered Tier IV habitats according to the SDBG (City of San Diego 2018).

b. Existing Campland

The project would follow the existing MBPMP recommendation to convert the existing Campland recreational site to contiguous marshland habitat with connection to KFMR/NWP. Implementation of this recommendation would result in up to 46.25 acres of direct impacts to disturbed and developed land, both of which are Tier IV land covers according to the SDBG (City of San Diego 2018). Impacts to disturbed and developed land would be less than significant.

The project would also implement the MBPMP recommended expansion of marshland habitat extending from the existing Campland into Mission Bay, which would result in up to 181.73 acres of direct impacts to open water and eelgrass beds. These communities are considered wetlands and sensitive communities according to the SDBG (City of San Diego 2018); therefore, impacts to open water and eelgrass beds are considered potentially significant.

c. Mission Bay Tennis Center, Athletic Fields, and Golf Course

Implementation of the project, which includes upgrades to the existing tennis center and athletic fields, installation of water quality design features within the existing golf course, and expansion of pedestrian access along Mission Bay Drive, could potentially result in up to 63.47 acres of direct impacts to the vegetation communities and land cover types in the MBTAG. The majority of the direct impacts (61.65 acres) would occur to the developed land in the MBTAG. Impacts to Tier IV developed and disturbed land in the MBTAG land would not require mitigation, in accordance with the SDBG (City of San Diego 2018). Project activities, as discussed above, in the MBTAG would result in a small amount of impacts (1.82 acres) to mudflat, open water, disturbed wetland (Arundo), disturbed freshwater marsh, and developed land. Mudflat, open water, disturbed wetland (Arundo), and disturbed freshwater marsh are considered wetlands and sensitive communities according to the SDBG (City of San Diego 2018). Therefore, impacts to these sensitive communities are considered potentially significant.

d. De Anza Cove Area

Implementation of the project could result in impacts of up to 5.12 acres of open water, 0.49 acre of eelgrass beds and 0.63 acre of mudflats in the De Anza Cove area. These communities are considered wetlands and sensitive communities according to the SDBG (City of San Diego 2018); therefore, impacts to open water, eelgrass beds, and mudflats are considered potentially significant. Impacts to Tier IV developed and disturbed land in the De Anza Cove area would be less than significant.

Indirect Impacts

Most of the indirect impacts to sensitive plant species described in Issue 1: Sensitive Plant and Wildlife Species, also result in potentially significant indirect impacts to sensitive vegetation communities. The project would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines are demonstrated in Tables 4 and 5 in Appendix D. In addition, because the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the project. Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the project would be less than significant.

Impact 5.3-2 The proposed project could have a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats, as identified in the Biology Guidelines of the Land Development manual, or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

5.3.3.3 Issue 3: Wetlands

Would the proposed project result in a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?

a. Direct Impacts

A total of approximately 275.36 acres of wetlands and non-wetland waters potentially under the jurisdiction of U.S. Army Corps of Engineers (USACE) and RWQCB, CDFW, and/or wetlands regulated by the City of San Diego occur in the project area. These potentially jurisdictional aquatic resources in the project area include approximately 165.67 acres of wetlands and riparian areas (southern coastal salt marsh, salt panne, mudflats disturbed wetland [Arundo], and disturbed freshwater marsh) and 109.69 acres of non-wetland waters (open water and tidal channels). As discussed in Issue 2: Sensitive Vegetation Communities, the project would result in direct impacts to the aquatic and wetland vegetation communities also potentially under the jurisdiction of the USACE, RWQCB, and CDFW and regulated by the City of San Diego (Figure 5.3-2, Impacts to Potentially Jurisdictional Aquatic Resources – Proposed Project). An analysis of the exact acreage of impacts that would occur to wetlands in the project area as a result of the project is not provided at the programmatic level because such analysis would be speculative in nature since future site-specific projects are not known at this time. As future site-specific projects come forward, project-specific analysis would be conducted in the review phase of the project, and any impacts to wetlands would be avoided, minimized, or mitigated as conditions of project approval prior to the implementation of the future site-specific projects.

For development in the COZ, the City requires a 100-foot-wide avoidance buffer surrounding wetland resources to reduce indirect impacts and ensure the value and function of the wetland is maintained. Since large portions of the proposed project necessarily occur within wetlands and the project is confined by existing development in the surrounding area, impacts to the wetland buffers in these areas would be unavoidable and necessary reductions to the width of the wetland buffers would be determined in coordination with USACE, RWQCB, CDFW, and USFWS prior to project implementation, in accordance with the requirements in SDBG (City of San Diego 2018). Although wetland buffers may be reduced in some areas, the proposed project would result in expansion and enhancement of wetlands in the De Anza Cove area and KFMR/NWP project component areas through establishment of mudflat and marshland habitat such that the proposed project would result in a net benefit to these habitats and associated wildlife species by providing an overall increase in wetland area following project implementation. In these locations, the proposed restoration/creation activities would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of City's Land Development Code; Environmentally Sensitive Lands regulations. In addition, to the extent feasible, the project would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be less than significant.

The project would comply with all federal, state, and local regulations protecting biological resources as a condition of subsequent project-level approvals. This includes complying with applicable federal and state regulations that ensure no net loss of aquatic resources, such as Section 404 of the federal Clean Water Act, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the California Fish and Game

Code, and the Porter-Cologne Water Quality Control Act. Prior to the start of construction, the proposed project would be required to obtain regulatory permits from USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts pursuant to the SDBG, as well as, subsequent regulatory agency permit requirements. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant (**Impact 5.3-3**)

b. Indirect Impacts

Most of the indirect impacts to sensitive plant species and sensitive vegetation communities described in Issue 1 and Issue 2 also result in potentially significant indirect impacts to jurisdictional aquatic resources. The project would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines are demonstrated in Tables 4 and 5 in Appendix D. In addition, because the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the proposed project. Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the project would be less than significant.

Impact 5.3-3 The proposed project could have a substantial adverse impact on wetlands (including but not limited to marsh, vernal pool, and riparian) through direct removal, filling, hydrological interruption, or other means.

5.3.3.4 Issue 4: Wildlife Movement

Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites?

a. Direct Impacts

The project area provides suitable nesting, foraging, and dispersal areas for both sensitive and common wildlife species because of the presence of native vegetation communities (among the last remaining marshland in this part of the City), its connection to Mission Bay, and proximity to the Pacific coast and open waters to the west and is likely used as a wildlife corridor. Further, the western portion of the project area, partially within the KFMR/NWP and Campland areas, is identified in the MSCP SAP as a Biological Core and Linkage Area. This core and linkage area borders Mission Bay, which functions as a wildlife movement corridor for resident and migratory birds, marine mammals, and fish species both locally and regionally. The dense residential and commercial development immediately surrounding the project area has the potential to limit wildlife movement through the project area. However, the open space within the western portion and immediately to the south of the project area has been designated as important habitat connectivity areas by the MSCP SAP and is documented as supporting a wide variety of both local and migratory species.

Project impacts are proposed primarily within an existing developed setting (e.g., Campland, De Anza Cove, and MBTAG) or would only be short-term impacts that occur during construction activities to restore and expand wetland habitat within the project area. All existing wildlife corridors would remain in place after implementation of the project. Further, the project would provide an overall enhancement of wildlife movement opportunities throughout much of the project area by establishing native wetland habitat in areas that were previously developed, disturbed, or underwater, which would provide additional foraging habitat and cover for wildlife movement. Therefore, significant direct long-term impacts to wildlife corridors and habitat connectivity provided by the project area are not expected to occur and impacts would be less than significant.

The KFMR/NWP does intersect the MHPA and contains sensitive habitat suitable for wildlife movement and foraging. However, the impacts proposed within this area are limited to restoration and other habitat improvements including enhancement and hydrologic restoration, which would provide a long-term benefit for wildlife movement through the project area. While project activities may temporarily disrupt wildlife movement through the project area, the project is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would increase as a result of project implementation. Therefore, impacts to wildlife corridors and habitat connectivity would be less than significant.

b. Indirect Impacts

Wildlife movement corridors and habitat connectivity would be impacted by many of the other indirect effects discussed in Issue 2. The proposed project would comply with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, through implementation of site design, source control, and incorporation of construction and permanent BMPs. The project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines are demonstrated in Tables 4 and 5 in Appendix D. In addition, because the project is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAGs. Consistency with the LUAGs ensures minimization of adverse edge effects from implementation of the project. Therefore, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the project would be less than significant.

5.3.3.5 Issue 5: Conservation Planning

Would the proposed project result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region?

The MHPA occurs along the western section of the project area and portions of the KFMR/NWP are within the MHPA boundary with direct impacts potentially occurring within and adjacent to the MHPA (e.g., hydrologic restoration, expanded marshland/habitat). When land is developed adjacent to the MHPA, there is potential for indirect impacts to occur that would result in detrimental effects related to drainage, toxics, lighting, noise, human intrusion, and invasive species. Indirect impacts from the proposed project could occur adjacent to the MHPA from the demolition of the existing Campland

and the installation of expanded marshland habitat. The project is required to document compliance with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, species-specific ASMDs provided in the MSCP SAP Appendix A, and the MSCP SAP General Planning Policies and Design Guidelines (City of San Diego 1997). Table 4 in Appendix D demonstrates the project's compliance with the MSCP SAP General Management Directives and species-specific ASMDs and Table 5 in Appendix D demonstrates the project's compliance with the MSCP SAP General Planning Policies and Design Guidelines. The project would be consistent with the policies and requirements of the MSCP, including mitigation requirements.

Therefore, impacts would be less than significant.

5.3.3.6 Issue 6: Multi-Habitat Planning Area Edge Effects

Would the proposed project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?

The MHPA occurs along the western section of the project area within portions of the KFMR/NWP. Implementation of the proposed project would introduce new land uses adjacent to the MHPA through the demolition of the existing Campland and installation of expanded marshland habitat, thereby increasing the amount of marshland within Mission Bay. As described in Appendix D, the project could result in adverse edge effects adjacent to the MHPA. As demonstrated in Tables 5 and 6 in Appendix D, the project would be a compatible land use within the MHPA and would follow the General Planning Policies and Design Guidelines outlined in Section 1.4.2 of the MSCP SAP. Because a portion of the project occurs within the MHPA, the project is required to document compliance with the MHPA LUAGs. The project complies with the MHPA LUAGs. Therefore, impacts would be less than significant.

5.3.3.7 Issue 7: Local Policies/Ordinances

Would the proposed project conflict with any local policies or ordinances protecting biological resources?

The project is located in the City of San Diego; therefore, is subject to the goals and policies in the City's General Plan. The City's General Plan element applicable to biological resources includes the Conservation and Recreation Element. As described in Table 7, City of San Diego General Plan Conservation and Recreation Elements Consistency, in Appendix D, the project would be consistent with the City's General Plan goals and policies, including mitigation requirements. Therefore, impacts would be less than significant.

5.3.3.8 Issue 8: Invasive Species

Would the proposed project result in an introduction of invasive species of plants into a natural open space area?

Implementation of the project could result in potential impacts from the introduction of invasive plant species into natural open space areas within the MHPA and KFMR/NWP. Invasive species have the potential to establish and displace native species through competition for limited resources, resulting

in monotypic stands of invasive species habitat that does not support other native species, including wildlife. These impacts from invasive species could occur through human intrusion into natural open space areas, from unintended dispersal of invasive species seed during eradication efforts, and from the exposure of bare soil areas during construction activities adjacent to these natural areas, which can provide jump-off locations for invasive species to establish and subsequently disperse into the natural open space areas. Impacts would be potentially significant (**Impact 5.3-4**).

Impact 5.3-4 The proposed project could result in an introduction of invasive species of plants into natural open space areas.

5.3.4 Significance of Impacts

5.3.4.1 Sensitive Species

Implementation of the project has the potential to impact sensitive plant and wildlife species directly through the loss of habitat or indirectly by constructing development adjacent to sensitive habitat. Potential impacts to federally or state-listed species (including raptors), migratory bird and raptor species, and plant species with a CRPR of 2 or higher would be significant (**Impact 5.3-1**).

5.3.4.2 Sensitive Habitats

Implementation of the proposed project would have a substantial adverse impact on Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Impacts would be significant (**Impact 5.3-2**).

5.3.4.3 Wetlands

Implementation of the project would have a substantial adverse impact on wetlands (including but not limited to marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means. Impacts would be significant (**Impact 5.3-3**).

5.3.4.4 Wildlife Movement

Implementation of the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, or impede the use of native wildlife nursery sites. Impacts would be less than significant.

5.3.4.5 Conservation Planning

Implementation of the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state Habitat Conservation Plan, either within the MSCP SAP area or in the surrounding region. Impacts would be less significant.

5.3.4.6 Multi-Habitat Planning Area Edge Effects

Implementation of the project would not introduce land use within an area adjacent to the MHPA that would result in adverse edge effects. Impacts would be less than significant.

5.3.4.7 Local Policies/Ordinances

Implementation of the project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant.

5.3.4.8 Invasive Species

Implementation of the project could introduce invasive species of plants into a natural open space area. Impacts would be significant (**Impact 5.3-4**).

5.3.5 Mitigation Framework

5.3.5.1 Sensitive Species

Direct impacts to sensitive plant species, including those not covered by the MSCP SAP, state-listed or federally listed species, or CRPR 1B.1, 1B.2, or 2B.2 species, are considered significant. Impacts to plant species ranked CRPR 3 or 4 would not be considered significant since any populations identified on the project area would not represent a significant percentage of the population in terms of the ability for the species to persist (i.e., CRPR 4 species are not considered "rare" from a statewide perspective).

In the event sensitive plant species are identified within the potential impact area, including MSCP SAP covered narrow endemic plant species, non-MSCP SAP covered federally and/or state-listed plant species, or non-MSCP SAP covered CRPR 1B.1, 1B.2, or 2B.2 species, or covered species (inside the MHPA), potential impacts are considered potentially significant without mitigation. Implementation of **MM BIO 5.3-1** would reduce potential direct impacts to less than significant to sensitive plant species by requiring project-level evaluations and focused surveys to be conducted prior to any construction associated with the proposed project.

Implementation of **MM BIO 5.3-1** and **MM BIO 5.3-2** would reduce potential indirect impacts to less than significant to sensitive plant species by requiring sensitive plant species focused surveys to be conducted prior to subsequent project-level approval and during construction and monitoring by a qualified biologist throughout construction of the proposed project. Per the SDBG, direct impacts to vegetation communities used by wildlife would be conserved or restored through the implementation of **MM BIO 5.3-3** through **MM BIO 5.3-5**, which require mitigation or revegetation for impacts to sensitive vegetation communities and jurisdictional aquatic resources. **MM BIO 5.3-6** would be implemented to minimize and avoid indirect impacts to sensitive marine wildlife species that may occur from new sources of noise and vibration during construction of the proposed project.

As future site-specific projects come forward, project-specific analysis would be required during the design and review phase of the project to ensure that any impacts to sensitive species are avoided, minimized, or mitigated as conditions of project approval prior to implementation.

MM BIO 5.3-1 **Focused Sensitive Plant Species Surveys.** Prior to subsequent project-level approval and prior to any construction or grading activities, focused surveys for future site-specific development shall be conducted, as applicable, in suitable habitat in order to determine presence/absence of sensitive plant species previously observed or with high potential to occur within the proposed project area, including California seablite, Palmer's frankenia, and estuary seablite. For these species, focused surveys shall be conducted during their specific blooming periods to determine presence/absence. If sensitive species are mapped within any proposed construction, access, or staging areas, these areas shall be modified to avoid direct impacts to mapped sensitive plant species. If significant impacts to these species are unavoidable, the take of these species shall be reduced to a less than significant level through implementation of one or a combination of the following actions, in accordance with a City of San Diego approved Conceptual Restoration Plan or acquisition of mitigation credits:

- Impacted plants shall be salvaged and relocated to suitable habitat in the on-site restoration area in Kendall-Frost Marsh Reserve/Northern Wildlife Preserve within the Multi-Habitat Planning Area boundary, if possible. If relocation to this site is not practical, the plants shall be relocated off-site to an appropriate (nearby) location determined by a qualified biologist.
- Seeds from impacted plants shall be collected for use at a local off-site location.
- Off-site habitat that supports the species impacted shall be enhanced and/or supplemented with seed collected on site.
- Comparable habitat at an approved off-site location shall be determined by a qualified biologist and preserved for relocation, enhancement, or transplant of the impacted sensitive plants.

Mitigation that involves relocation, enhancement, or transplant of sensitive plants shall include all of the following:

- Conceptual planting plan prepared by a qualified biologist including grading and, if appropriate, temporary irrigation
- Planting specifications and fencing and signage to discourage unauthorized access of the planting site
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

MM BIO 5.3-2 **Qualified Monitoring Biologist.** Prior to subsequent project-level approval and prior to the start of construction activities, the project biologist shall submit a letter to City of San Diego Planning Department and City of San Diego Development Services Department Mitigation Monitoring Coordination that confirms a qualified monitoring biologist, as defined in the City of San Diego's Municipal Code, Biology Guidelines, has been retained to implement required monitoring. This letter will also include the names and resumes of all people involved in the biological monitoring of the proposed project, a schedule for the proposed work, and the facility's pre-approved Facility Maintenance Plan.

The qualified monitoring biologist shall be responsible for the following monitoring and reporting tasks:

a. **Documentation.** Prior to the issuance of any construction or grading plans in any proposed project area within, or immediately adjacent to, a Multi-Habitat Planning Area, the qualified monitoring biologist shall verify and submit proof to Mitigation Monitoring Coordination that all Multi-Habitat Planning Area boundaries and limits of work have been delineated on all maintenance documents.

b. **Biological Construction Mitigation/Monitoring Exhibit.** Prior to the start of construction within the future site-specific proposed project area, the qualified monitoring biologist shall submit a Biological Construction Mitigation/Monitoring Exhibit, which includes limits of work, proposed monitoring schedule, avian, focused sensitive species, or other wildlife surveys/survey schedules (including general avian nesting and U.S. Fish and Wildlife Service protocol), timing of surveys, avian construction avoidance areas/noise buffers/barriers, other impact avoidance areas, species-specific Multiple Species Conservation Program Subarea Plan Area-Specific Management Directives, and any subsequent requirements determined by the qualified monitoring biologist and the Mitigation Monitoring Coordination. The Biological Construction Mitigation/Monitoring Exhibit shall include the construction site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule for construction activities. Where the potential for impacts to biological resources is limited (e.g., construction within a footprint that consists entirely of previously developed or disturbed lands), the Biological Construction Mitigation/Monitoring Exhibit may be limited to a pre- and post-maintenance verification inspection. For highly sensitive resource areas, full-time biological monitors may be required. The Biological Construction Mitigation/Monitoring Exhibit shall be approved by Mitigation Monitoring Coordination prior to the start of construction.

c. **Avian Protection.** In order to prevent impacts to California least tern and other sensitive nesting shorebirds, the qualified monitoring biologist and Mitigation Monitoring Coordination shall ensure that no clearing, grubbing or grading or active wetland creation/restoration shall take place within or adjacent to the Multi-Habitat Planning Area, California least tern preserves, and coastal salt marsh habitats during the City of San Diego's general avian breeding season of February 1 to September 15. Activities must comply with the City of San Diego's Biology Guidelines, Multiple Species Conservation Program Subarea Plan, Land Use Adjacency Guidelines, and applicable state and federal law (e.g., appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers). Additionally, the following requirements from the Mission Bay Park Natural Resource Management Plan and Mission Bay Park Master Plan for the California least tern shall be met:

- In-water construction or dredging shall not be permitted in Mission Bay from April 1 through September 15, unless otherwise approved in writing by the City

of San Diego, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service. Any exception would have to meet the following criteria to preserve least tern nesting and foraging: use of silt curtains or similar devices around in-water construction activity, use of noise reduction or low noise equipment, and use of timing and location restrictions on activity to avoid interfering with breeding sites or major least tern foraging areas.

- Direct impacts to permanently designated least tern nesting sites shall not be permitted.
- The 150-foot buffer zone for each least tern nesting site shall be free of structures with heights over 6 feet, including fencing, to avoid providing raptors perches from which to prey on least tern chicks.
- Any existing noise attenuation berms to prevent any significant noise from reaching the Multi-Habitat Planning Area and least tern preserve shall remain in accordance with the Mission Bay Park Natural Resource Management Plan and Mission Bay Park Master Plan.
- If construction or wetland creation/restoration construction activities take place during the California least tern breeding season, significant impacts may occur to least tern in the Multi-Habitat Planning Area. To avoid significant noise impacts to breeding least terns, construction within 500 feet of least tern preserves shall take place outside the least tern breeding season, which ranges from April 1 to September 15.

d. **Resource Marking/Protection.** Prior to the start of construction activities within the future site-specific proposed project area, the qualified monitoring biologist shall supervise the placement of orange construction fencing or similar visible marker, staking, or flagging along the limits of the construction area adjacent to sensitive biological habitats, as shown on the Biological Construction Mitigation/Monitoring Exhibit to ensure crews remain within the approved construction limits. These demarcations shall not be required for areas with existing barriers, such as chain-link fencing, along the limits or facilities that are within and/or adjacent to developed and non-sensitive habitat areas. This task shall include flagging plant specimens and delineating buffers to protect sensitive biological resources (e.g., habitats, sensitive plant and wildlife species, including nesting birds and raptors) prior to construction.

e. **Cover Trenches.** The qualified monitoring biologist shall oversee the construction site so that cover and/or escape routes for wildlife from excavated areas shall be provided daily. All steep trenches, holes, and excavations during construction shall be covered at night with backfill, plywood, metal plates, or other means, and if plastic sheeting is used, the edges must be covered with soils such that small wildlife cannot access the excavated hole. Soil piles shall be covered at night to prevent wildlife from burrowing in. The edges of the sheeting shall be weighed down by sandbags. These areas may also be fenced to prevent wildlife from gaining access. Exposed trenches, holes, and excavations shall be inspected twice daily (i.e., each morning and before sealing the exposed area) by the qualified monitoring biologist to monitor for wildlife entrapment. Excavations shall provide an earthen ramp to allow for a wildlife escape route. The qualified monitoring

biologist shall verify that the contractor has covered all steep-walled trenches or excavations prior to the end of construction daily. If wildlife species are encountered within any trenches or excavated areas, the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape (e.g., a ramp or sloped surface at no greater than a 30-degree angle) and allowed to disperse. In addition, the qualified monitoring biologist shall provide training to construction personnel to increase awareness of the possible presence of wildlife beneath vehicles and equipment and to use best judgment to avoid killing or injuring wildlife (see MM 5.3-2f).

f. **Structure Clearance.** Prior to the issuance of any permit to allow for the removal or demolition of trees and existing structures within the project area (particularly the ornamental trees and existing buildings in Campland on the Bay, De Anza Cove, and the Mission Bay Tennis Center, Athletic Fields, and Golf Course), the qualified monitoring biologist shall conduct clearance surveys to flush out any wildlife species nesting, roosting, or otherwise occupying the trees or structures. If wildlife species are encountered within any of the trees or structures (outside the general bird nesting season), the qualified monitoring biologist shall remove them, if possible, or provide them with a means of escape and allowed the species to disperse. If tree-roosting bats are suspected, slow removal by gently pushing the tree over with heavy equipment is required.

g. **Pre-Construction Meeting/Education.** Prior to the start of any construction activity where the site plan for the construction area indicates that significant impacts to biological resources may occur, a pre-construction meeting shall be held on site with the following in attendance: City of San Diego's project manager, Mitigation Monitoring Coordination representative, the construction contractor (if applicable), and the qualified monitoring biologist. At this meeting, the qualified monitoring biologist shall identify and discuss the construction protocols that apply to the proposed activities and the sensitive nature of the adjacent habitat with appropriate project personnel.

At the pre-construction meeting, the qualified monitoring biologist shall submit to the Mitigation Monitoring Coordination and construction contractor a copy of the Biological Construction Mitigation/Monitoring Exhibit that identifies areas to be protected, fenced, and monitored. This data shall include all buffer limits, if applicable.

Prior to the start of construction activities, the qualified monitoring biologist shall meet with the construction contractor and crew and conduct an on-site educational session regarding the need to avoid impacts outside the approved construction footprint and to protect sensitive plants and wildlife that may occur at the specific facility. This may include but not be limited to explanations of the avian and wetland buffers, the flag system for removal of invasive species or retention of sensitive plants, and clarification of acceptable access routes/methods and staging areas.

h. **Biological Monitoring and Reporting.** The qualified monitoring biologist shall inspect/monitor the proposed project construction area in accordance with the approved Biological Construction Mitigation/Monitoring Exhibit. This may be limited to pre- and post-maintenance inspections, weekly visits, or full-time monitoring, as determined by the qualified monitoring biologist and Mitigation Monitoring Coordination.

The qualified monitoring biologist shall document monitoring events via a Consultant Site Visit Record. This record shall be sent to the project manager each month, and the project manager shall forward copies to Mitigation Monitoring Coordination. However, if weekly reports are submitted as part of a separate agency permit requirement, these reports may be forwarded to Mitigation Monitoring Coordination in place of Consultant Site Visit Record submittals.

If no deviations from the construction site plan occur during maintenance, no additional documentation is required. However, if deviations from the site plan do occur, such as unanticipated impacts to sensitive vegetation communities or unanticipated discharge of pollutants, a Final Monitoring Report shall be prepared within 3 months following the completion of mitigation monitoring detailing maintenance and monitoring that occurred and any remedial or compensatory measures taken.

MM BIO 5.3-3 Sensitive Vegetation Communities and Jurisdictional Aquatic Resources Impacts Mitigation. Any direct impacts to sensitive vegetation communities or jurisdictional aquatic resources would require mitigation to comply with City of San Diego, state and/or federal authorizations, in accordance with the City of San Diego's ratios described in the following table (Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Proposed Project), as well as the ratios defined in any state and/or federal permit(s) issued for the project.

Mitigation Ratios for Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Aquatic Resources within the Proposed Project				
General Vegetation Type (Holland/Oberbauer Code)	**SDBG Vegetation Community**	**Jurisdiction**	**Project Component where Resource is Present**	**SDBG Required Mitigation Ratio (in COZ)**
Disturbed Freshwater Marsh (52410)	Freshwater Marsh	U/R/C/CC	MBTAG	4:1
Southern Coastal Salt Marsh (52120)	Salt Marsh	U/R/C/CC	KFMR/NWP	4:1
Open Water (64100)	Natural Flood Channel/Marine Habitat	U/R/C/CC	Expanded Marshland Habitat, De Anza Cove area	2:1
Eelgrass beds (64122)	Eelgrass beds[1]	U/R/C/CC	Expanded Marshland Habitat, De Anza Cove area	2:1
Tidal Channel (64112)	Marine Habitat	U/R/C/CC	KFMR/NWP	2:1
Salt Panne (64300)	Salt Panne	U/R/C/CC	KFMR/NWP	4:1
Mudflat (64300)	Marine Habitat	U/R/C/CC	KFMR/NWP	2:1
Disturbed Wetland (Arundo) (11200)	Disturbed Wetland	U A/R/C/CC	MBTAG	2:1

Notes: C = CDFW Jurisdictional; CC = CCC Jurisdictional; COZ = Coastal Overlay Zone; KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve; MBTAG = Mission Bay Tennis Center, Athletic Fields, and Golf Course; R = RWQCB Jurisdictional; SDBG = San Diego Biological Guidelines; U = USACE Jurisdictional

[1] At least 1:1 creation mitigation for impacts to eelgrass must occur within Mission Bay (the remaining 1:1 mitigation may occur outside Mission Bay, if necessary).

1. Potential direct impacts to sensitive vegetation communities, including jurisdictional aquatic resources, resulting from project implementation shall be mitigated through one of the following three options:

   a. Project compensatory mitigation for proposed impacts to sensitive vegetation communities, including jurisdictional aquatic resources, shall be provided through in-kind and on-site creation, enhancement, and/or restoration.

   b. Compensatory mitigation requirements that are not able to be satisfied through on-site creation, enhancement, and/or restoration shall be satisfied through the acquisition of mitigation bank credits via a resource agency-approved mitigation site within the Peñasquitos Watershed or by acquisition of other approved off-site mitigation credits. Prior to implementation of project construction impacts that would require compensatory mitigation, documentation demonstrating the availability of mitigation credits (i.e., credit ledger) at the approved mitigation site must be submitted to the Assistant Deputy Director Environmental Designee for confirmation.

c. If credits are not available at a resource agency-approved mitigation site within the Peñasquitos Watershed or through other approved off-site mitigation credits, implementation of habitat creation, restoration, enhancement, and/or preservation would occur through an approved Habitat Mitigation and Monitoring Plan. Under this option, as well as under option a, a Habitat Mitigation and Monitoring Plan shall be provided and prepared in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines. Mitigation shall conform with the Land Development Code—Biology Guidelines, including definitions for creation, restoration, enhancement, and acquisition identified under Environmentally Sensitive Lands regulations; satisfaction of no net loss; timing in relation to proposed project impacts; and generally, with federal and state mitigation requirements.

When proposed mitigation involves habitat enhancement, restoration or creation, the Habitat Mitigation and Monitoring Plan shall include all of the following information:

- Conceptual planting plan including planting zones, grading, and irrigation
- Seed mix/planting palette
- Planting specifications
- Monitoring program including success criteria
- Long-term maintenance and preservation plan

For mitigation that involves habitat acquisition, the Habitat Mitigation and Monitoring Plan shall include all of the following:

- Location of proposed acquisition
- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity

The identification of mitigation site credits shall be provided to the Environmental Designee and shall include the following:

- Location of approved mitigation site
- Description of the mitigation credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact
- Documentation of the credits that are associated with a mitigation bank, which has been approved by the appropriate resource agencies
- Documentation in the form of a current mitigation credit ledger

MM BIO 5.3-4 **Eelgrass Beds Creation.** Potential direct impacts to eelgrass beds caused by placement of fill material within Mission Bay shall be mitigated in accordance with the requirements of the resource agencies and the City of San Diego. The City of San Diego shall require a mitigation ratio of 2:1, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines (see table in MM BIO 5.3-3). In addition, at a minimum, the no net loss creation mitigation (1:1) for eelgrass beds habitat shall be

required to occur within Mission Bay itself per the Mission Bay Park Natural Resources Management Plan. The remaining 1:1 mitigation required may occur outside Mission Bay, if necessary.

Creation mitigation for potential direct impacts to eelgrass beds resulting from project implementation shall be achieved through replanting of the submerged areas surrounding the expanded marshland habitat in Mission Bay where, as a result of project fill activities to create the marshland habitat, water levels shall be raised to depths suitable for eelgrass establishment.

An associated Habitat Mitigation and Monitoring Plan shall be provided or prepared in accordance with the Land Development Code—Biology Guidelines for this creation mitigation and shall include all of the following information:

- Planting specifications, including channel bottom elevations
- Planting would be scheduled during low energy tides (late summer–early fall)
- Monitoring program, including post-project surveys and success criteria
- Long-term maintenance and preservation plan

MM BIO 5.3-5 **Habitat Restoration in Temporary Impact Areas.** Temporary direct impact areas shall be restored to pre-construction topographic contours and conditions, including the revegetation of native plant communities, where appropriate. Habitat restoration and erosion control treatments shall be installed within these short-term impact areas, in accordance with the City of San Diego's Municipal Code, Land Development Code—Biology Guidelines, Multiple Species Conservation Program Subarea Plan, and the City of San Diego's Municipal Code, Land Development Code—Landscape Standards. Habitat revegetation shall feature native species that are typical of the area, and associated erosion control best management practices shall include silt fence and microplastic- and weed-free straw fiber rolls, where appropriate. The revegetation areas shall be monitored and maintained for 25 months to ensure adequate establishment and sustainability of the plantings/seedings.

Where a proposed project activity involves potential disturbance of non-native invasive plant species (as identified by the California Invasive Plant Council), these plants shall be entirely removed where feasible, and the removal shall be monitored by the qualified monitoring biologist to ensure that dispersal of propagules (e.g., seeds, stems, etc.) are avoided or minimized. Where removal of plant roots is not feasible (e.g., where erosive flows are predicted), aboveground plant material shall be fully removed and monitored by the qualified monitoring biologist. Where aboveground plant material cannot be removed (e.g., due to limited access), herbicides shall be applied by a licensed pest control advisor, using chemicals permitted as safe within aquatic environments.

MM BIO 5.3-6 **Pre-Construction Hydroacoustic Study.** Prior to subsequent project-level approval and prior to any construction activities within the waters of Mission Bay, a hydroacoustic study would be required to determine if the activities have potential to

generate sound exposure level exceeding the thresholds described in the following table, Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts.

Summary of Potentially Significant In-Water Sound Exposure Level Indirect Impacts			
Impact Threshold Type	**SEL Impact Threshold for Marine Fish (dB)[1]**	**SEL Impact Threshold for Marine Mammals (dB_{rms})[1]**	**SEL Impact Threshold for Green Turtles (dB_{rms})[1]**
Peak	206	—	—
Accumulated[2]	187	—	—
Impact	—	160	166
Vibratory	—	120	166

Notes: dB = decibels; dB_{rms} = decibel root mean square; SEL = sound exposure level

1 Source: Merkel & Associates 2017

2 Accumulated SEL is derived from the number of pile strikes ($SEL_{cumulative}$ = SEL + 10*log[#strikes) as such, the starting SEL would dictate the number of pile strikes possible prior to exceeding the threshold of 187dB $SEL_{cumulative}$

1. If evidence from the study determines that construction activities would result in sound exposure level that would cause indirect hydroacoustic impacts on marine species through exceedance of approved thresholds in the table above, implementation of the measures below would reduce the potential impacts to levels less than significant:

    a. A City biologist would monitor for the presence of marine species, including green sea turtles, within 500 feet of the work site during construction activities in Mission Bay with potential to generate sound exposure level above the impact thresholds (e.g., pile driving) in order to limit the potential for exposure of the animals. If a marine species subject to the thresholds described above is identified within the 500-foot buffer during construction activities, the biologist will direct crews to halt work until the animal has moved outside the buffer.

    b. To the extent feasible, sound exposure level reduction measures shall be utilized during all work in Mission Bay with potential to generate hydroacoustic effects on marine resources. These measures would include placing a nylon or wooden block between the impact hammer and piles during pile driving to reduce sound exposure level generated by the hammer strikes or "soft start" approaches to encourage marine species to leave the area surrounding work before full sound exposure level are generated.

2. If evidence from the study determines that no significant exceedances of sound exposure level that would affect marine resources are anticipated from the proposed construction activities, no mitigation measures would be necessary.

5.3.5.2 Sensitive Habitats

Implementation of **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating and restoring

impacted vegetation communities. As future site-specific projects come forward, project-level specific analysis would be required during the design and review phase of the project to ensure that any impacts to sensitive habitats are avoided, minimized, or mitigated as conditions of project approval prior to implementation.

5.3.5.3 Wetlands

Development of the project would result in potentially significant direct impacts to jurisdictional aquatic resources. Implementation of **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce direct impacts to jurisdictional aquatic resources through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts, and creating and restoring temporary impact areas. As future site-specific projects come forward, project-specific analysis would be required during the design and review phase of the project to ensure that any impacts to wetlands are avoided, minimized, or mitigated as conditions of project approval prior to implementation.

5.3.5.4 Wildlife Movement

No mitigation is required.

5.3.5.5 Conservation Planning

No mitigation is required.

5.3.5.6 Multi-Habitat Planning Area Edge Effects

No mitigation is required.

5.3.5.7 Local Policies/Ordinances

No mitigation is required.

5.3.5.8 Invasive Species

The potential impacts from introduction of invasive species would be avoided through compliance with the Landscape Regulations (Land Development Code 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) requiring all plant species installed within 100 feet of the MHPA be non-invasive and mitigated through implementation of **MM BIO 5.3-5**. As future site-specific projects come forward, project-specific analysis would be required during the design and review phase of the project to ensure that any impacts related to invasive species are avoided, minimized, or mitigated as conditions of project approval prior to implementation.

5.3.6 Significance of Impacts After Mitigation

5.3.6.1 Sensitive Species

Implementation of **MM BIO 5.3-1** and **MM BIO 5.3-2** would mitigate potential direct impacts to sensitive plant species to below a level of significance through conducting sensitive plant species

focused surveys prior to construction and monitoring by a qualified biologist throughout construction of the project. Implementation of **MM BIO 5.3-2** through **MM BIO 5.3-5** would mitigate potential direct impacts to sensitive wildlife species and their habitats to below a level of significance through monitoring by a qualified biologist, providing mitigation ratios for acreage impacts and the creation and restoration of impacted vegetation communities. Implementation of **MM BIO 5.3-2** would mitigate potential direct impacts to sensitive roosting bats to below a level of significance. This mitigation measure would require monitoring by a qualified biologist who is responsible for identifying and flushing any roosting bats from ornamental trees and/or structures prior to removal. Implementation of **MM BIO 5.3-6** would reduce potential indirect impacts to sensitive marine wildlife species to below a level of significance. This mitigation measure would require a pre-construction hydroacoustic study to determine if the activities have potential to generate SEL exceeding the thresholds and apply measures to reduce those levels to minimize impacts to marine wildlife.

5.3.6.2 Sensitive Habitats

Implementation of **MM BIO 5.3-2** through **MM BIO 5.3-5** would mitigate potential direct impacts to sensitive vegetation communities to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and the creation and restoration of impacted vegetation communities.

5.3.6.3 Wetlands

Implementation of **MM BIO 5.3-2** through **MM BIO 5.3-5** would mitigate potential direct impacts to jurisdictional aquatic resources to below a level of significance through monitoring by a qualified biologist, adhering to required mitigation ratios for acreage impacts, and creating and restoring temporary impact areas.

5.3.6.4 Wildlife Movement

Direct and indirect impacts to wildlife movement corridors and habitat linkages within the project area were determined to be less than significant, and no mitigation is required.

5.3.6.5 Conservation Planning

Impacts to conservation planning were determined to be less than significant, and no mitigation is required.

5.3.6.6 Multi-Habitat Planning Area Edge Effects

Impacts to the MHPA from adverse edge effects were determined to be less than significant, and no mitigation is required.

5.3.6.7 Local Policies/Ordinances

Impacts from conflicts with the City's General Plan Conservation and Recreation Element goals and policies were determined to be less than significant, and no mitigation is required.

5.3.6.8 Invasive Species

Implementation of **MM BIO 5.3-5** would mitigate the potential impacts from the introduction of invasive species of plants into a natural open space area to below a level of significance by removing invasive plant species and revegetation of native plant communities in compliance with the City's Landscape Regulations.

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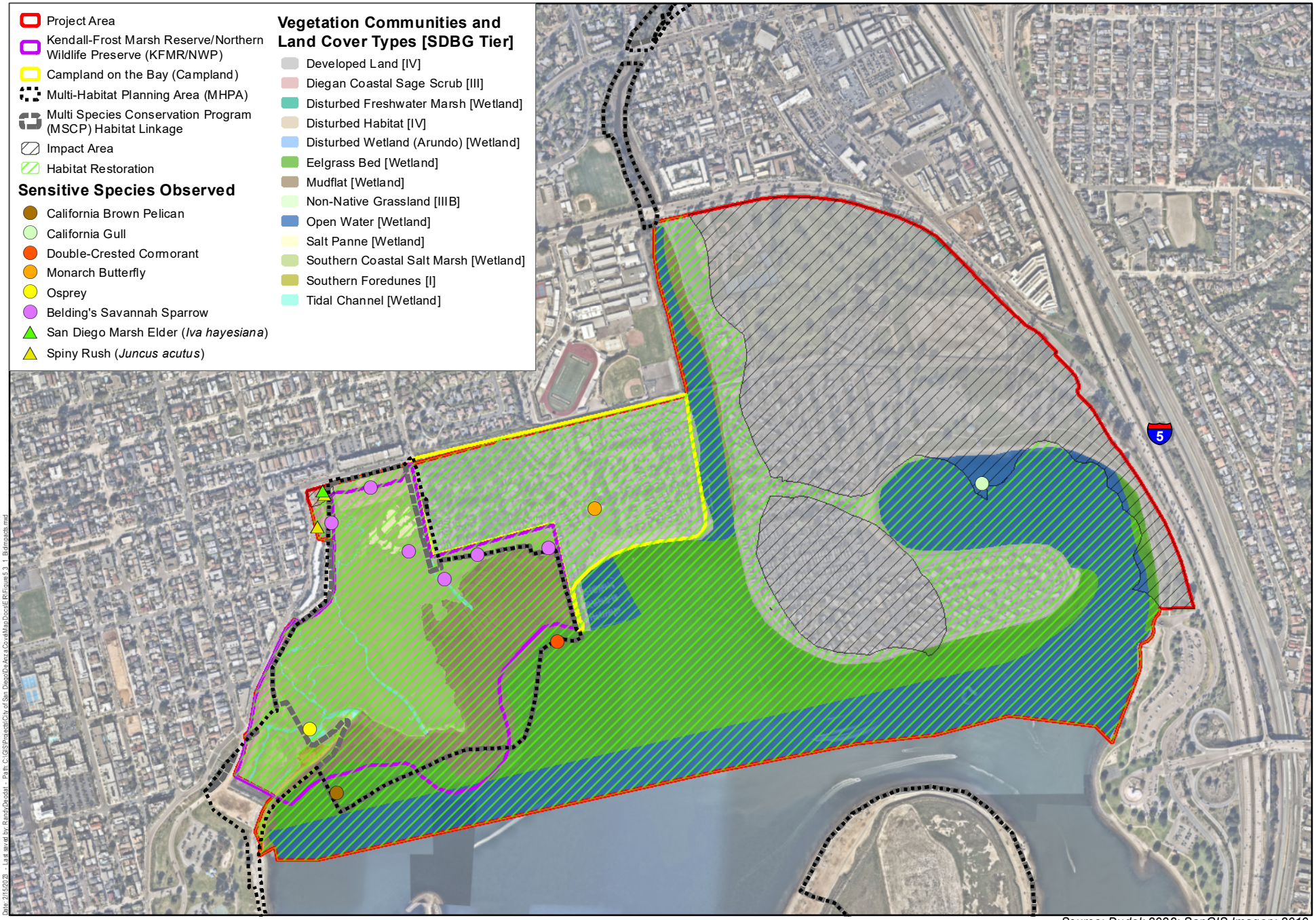

Source: Dudek 2022; SanGIS Imagery 2019.

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Feet

Figure 5.3-1

Impacts to Biological Resources - Proposed Project

De Anza Natural Amendment to the Mission Bay Park Master Plan

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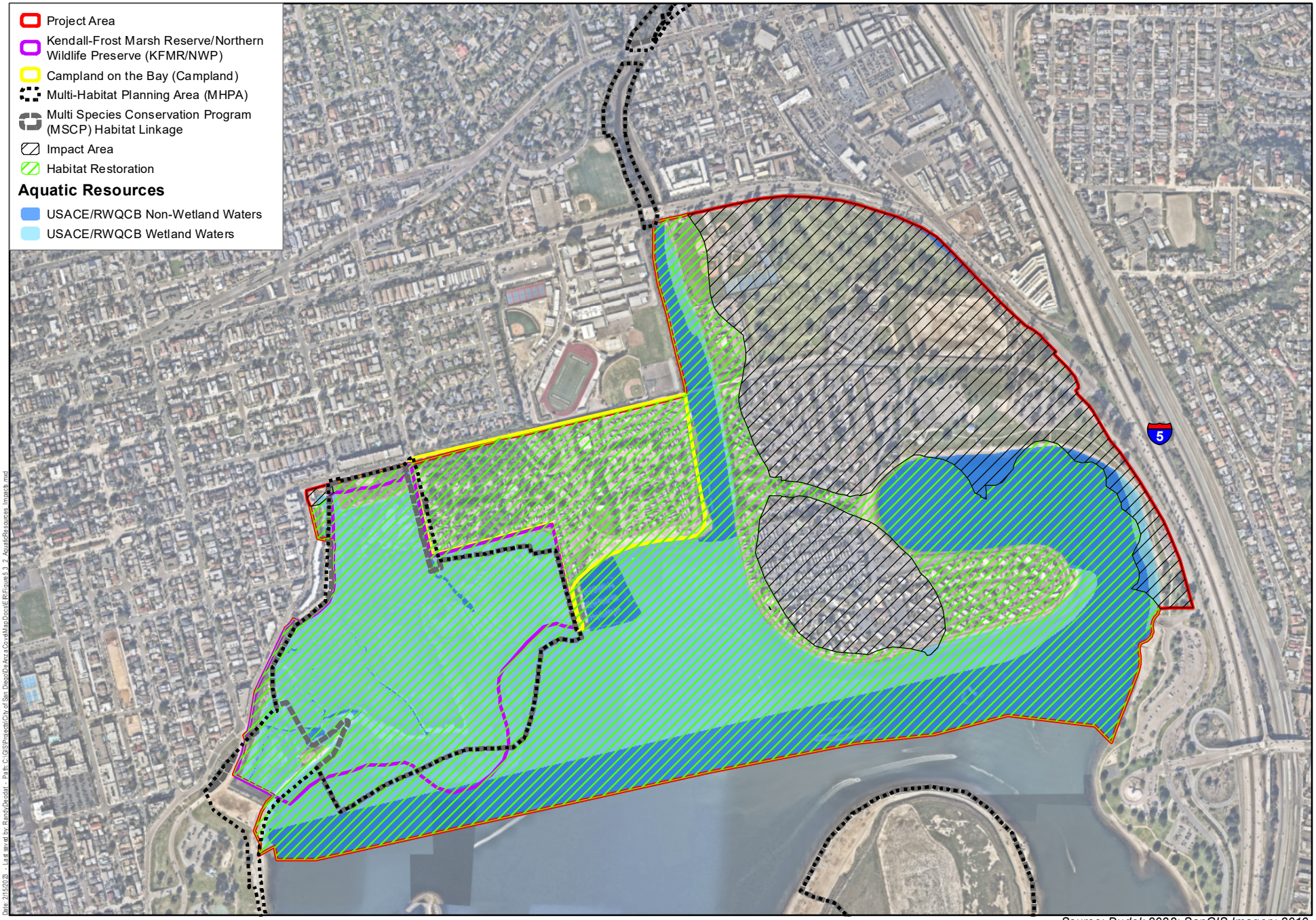

Source: Dudek 2022; SanGIS Imagery 2019.

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Figure 5.3-2

Impacts to Potentially Jurisdictional Aquatic Resources - Proposed Project

De Anza Natural Amendment to the Mission Bay Park Master Plan

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5.4 Greenhouse Gas Emissions

This section analyzes potential impacts related to greenhouse gas (GHG) emissions that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The analysis in this section is based on review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021a) and MBPMP Environmental Impact Report (EIR) (City of San Diego 1994), the City of San Diego's (City's) Climate Action Plan (CAP) (City of San Diego 2022a), the City's Climate Resilient SD Plan (City of San Diego 2021b), the Greenhouse Gas Emissions Analysis prepared by Harris & Associates (2022) (Appendix E) for the project, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022b).

5.4.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing conditions related to GHG emissions (Section 2.3.4, Greenhouse Gas Emissions) and Chapter 4.0, Regulatory Framework (Section 4.4, Greenhouse Gas Emissions), for a discussion of relevant plans, policies, and regulations related to GHG emissions. In summary, gases that trap heat in the atmosphere are often called GHGs. The GHGs of concern for the project area are carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). GHGs in the atmosphere can contribute to climate change. The state has established statewide emissions reductions targets. Most recently, Assembly Bill 1279 established a target of net zero not later than 2045. Consistent with state targets, the City adopted a CAP in August 2022 that outlines a local path to net zero emissions.

5.4.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022b), which have been adapted to guide a programmatic analysis of the project, a significant impact would occur if implementation of the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Regarding Threshold 1, the City adopted an updated qualified CAP in August 2022 that establishes a Citywide goal of net zero by 2035. A qualified CAP is one that meets requirements so that future development projects requiring environmental review under state law can streamline GHG impact analyses by demonstrating consistency with the CAP. Therefore, this project is evaluated for

consistency with the City's CAP based on guidance issued by the City for plan-level environmental documents to determine the significance of project GHG emissions (City of San Diego 2022a).

5.4.3 Impact Analysis

5.4.3.1 Issue 1: Greenhouse Gas Emissions

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

Impacts related to GHG emissions associated with the proposed project are analyzed herein through a qualitative analysis of anticipated GHG emissions and consistency with the City's CAP. In general, GHG emissions attributable to the proposed project at full buildout would be less than GHG emissions under the existing conditions and the adopted MBPMP due to the deintensification of land uses and associated decrease in developed land. Any increase in GHG emissions associated with the construction and operation of the proposed project were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections prepared for the 2022 CAP. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. One of the CAP's strategies is to restore salt marshland and other associated tidal wetlands; at buildout, the proposed project would provide approximately 140.5 acres of restored wetlands.

Furthermore, the CAP is a Qualified GHG Reduction Plan because it meets the requirements set forth in CEQA Guidelines, Section 15183.5, whereby a lead agency (e.g., the City) may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a General Plan, a Long-Range Development Plan, or a separate plan to reduce GHG emissions (City of San Diego 2022a).

The 2022 CAP replaced the CAP Consistency Checklist with the CAP Consistency Regulations, which are codified in the City's Land Development Code (Chapter 14, Article 3, Division 14). Most new discretionary and ministerial development, as specified in the CAP Consistency Regulations, would be required to comply with the CAP Consistency Regulations, which contain measures that are required to be implemented on a project-by-project basis to ensure that the GHG emissions reduction targets identified in the CAP are achieved. Therefore, compliance with CAP Consistency Regulations upon implementation of the proposed project would result in less than significant impacts associated with GHG emissions.

5.4.3.2 Issue 2: Conflicts with Plans or Policies

Would the proposed project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The following analysis compares the project with the City's CAP, City's Climate Resilient SD Plan, San Diego Association of Governments' San Diego Forward: The Regional Plan (2021 Regional Plan), and California Air Resources Board's (CARB's) 2022 Scoping Plan.

a. 2008 General Plan and 2022 Climate Action Plan

In accordance with City guidance for CAP Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (City of San Diego 2022c), the environmental analysis for plan-level environmental documents should address the ways in which the plan or policy is consistent with the goals and policies of the City's General Plan and CAP, specifically Policies LU-A.7, ME-B.9, CEJ.2, and CE-J.3 from the General Plan, and all six strategies from the CAP. Consistency with these policies and strategies is evaluated in Table 5.4-1, General Plan and Climate Action Plan Consistency.

Table 5.4-1. General Plan and Climate Action Plan Consistency

Policy or Strategy	Project Consistency
General Plan	
LU-A.7: Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community. c. Evaluate the quality of existing and planned transit service.	The project would reduce the density of development in the project area in order to increase habitat restoration. The project land uses and development intensity are consistent with the surrounding area within Mission Bay Park. The project would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on the site to the surrounding community. Regarding transit services, the project does not propose new transit connections but instead would be served by existing transit in the area. The project would be consistent with this policy.
ME-B.9: Make transit planning an integral component of long range planning documents and the development review process. a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Locate new public facilities that generate large numbers of person trips, such as libraries,	The project is not a community plan but an amendment to a Master Plan that does not propose new residential or commercial development that should consider development intensity and transit proximity. The project proposes public recreation uses in a regional park that would replace similar existing uses. Overall development would be reduced under the project compared to the existing baseline condition, in order to increase habitat restoration. The project has been designed for walkability and would provide improved pedestrian and bicycle connections to the surrounding community. The project would be consistent with this policy.

Table 5.4-1. General Plan and Climate Action Plan Consistency	
Policy or Strategy	**Project Consistency**
community service centers, and some recreational facilities in areas with existing or planned transit access. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment. f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.	
CE-J.2: Include community street tree master plans in community plans. a. Prioritize community streets for street tree programs. b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form. c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.	The project would increase wetland habitat restoration and encourage tree preservation along streets, where feasible in accordance with the CAP Consistency Regulations. It would support the City's goal to protect and expand green spaces by decreasing the developed land in the project area and restoring the developed land with active recreation, regional parkland, open beach, and wetland land use. The project would be consistent with this policy.
CE-J.3: Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.	The project is not a community plan update. As discussed in Policy CE-J.2, the project would not impact trees. Therefore, the project would be consistent with this policy.
2022 Climate Action Plan	
Strategy 1: Decarbonization of the Built Environment.	The project would not include any components that would conflict with the achievement of the decarbonization of the built environment. The project would provide low-cost visitor guest accommodations, recreational opportunities, and habitat restoration. Proposed development would replace existing similar land uses at a reduced density to increase habitat restoration. The project would support goals to reduce the use of fossil fuels by providing electric vehicle infrastructure to the extent required, and improved pedestrian and bicycle facilities and connections to the surrounding community. The project would be consistent with this strategy.
Strategy 2: Access to Clean & Renewable Energy.	The project would not include any components that would conflict with the achievement of a goal of 100 percent renewable energy. The project is anticipated to reduce energy demand compared to the existing baseline condition due to reduced development density allowing for increased habitat restoration. The project would comply with all applicable energy standards for new low-cost visitor guest accommodations and recreational facilities. The project would be consistent with this strategy.

Table 5.4-1. General Plan and Climate Action Plan Consistency	
Policy or Strategy	**Project Consistency**
Strategy 3: Mobility & Land Use.	The project would further the goals of Strategy 3 by improving bicycle and pedestrian connections with the proposed recreational facilities and surrounding community. The project would be consistent with this strategy.
Strategy 4: Circular Economy & Clean Communities.	Construction of the project would comply with the City's Construction and Demolition Debris Diversion Ordinance, as applicable. The project area would result in decreased development density compared to the existing baseline condition in order to increase wetland habitat restoration; therefore, project operations would decrease solid waste production. The project would be consistent with this strategy.
Strategy 5: Resilient Infrastructure and Healthy Ecosystems.	The project would further the City's climate resiliency goals related to healthy ecosystems by increasing wetland habitat restoration. The conversion of currently developed land to restored habitat would support the conservation of natural habitats facing sea level risk. Additionally, future site-specific development would need to demonstrate consistency with the CAP regulations regarding street trees and urban forestry. The project would be consistent with this strategy.
Strategy 6: Emerging Climate Action.	The project would support identified actions in Strategy 6 related to carbon sequestration, specifically wetland habitat restoration. As the restored wetland matures, it would increase its carbon sequestration ability. Therefore, the project would be consistent with this strategy.

Source: Appendix E.
Notes: CAP = Climate Action Plan

Future project design would comply with all applicable existing and future sustainability regulations adopted to meet the CAP emissions reduction goals. Temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. Additionally California regulations limit construction equipment and vehicle idling, and City construction best management practices promote energy efficiency. As demonstrated in Table 5.4-1, the project would be consistent with the City's General Plan and CAP.

b. Climate Resilient SD Plan

On December 14, 2021, the San Diego City Council adopted the City's first-ever climate adaptation and resiliency plan. Climate Resilient SD Plan provides strategies to prepare, respond and recover from potential climate change hazards, like extreme heat, wildfires, sea level rise, and flooding and drought, as well as how the proposed investments can improve local communities. It will increase the City's ability to adapt, recover, and thrive in a changing climate. Key plan components include connected

and informed communities, resilient and equitable planning and investment, protection for historical and Tribal resources, protection for natural environments, and maintenance of critical infrastructure.

The project supports the plan goals and policies related to protecting natural environments. Specifically, the proposed habitat restoration supports Policy TNE-1, which includes supporting ecosystem and watershed function to increase the capacity of the system to withstand stress from climate change, and Policy TNE-2, which includes expansion of natural features, including wetlands. Wetlands are identified as an important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. The project does not include any components that would conflict with the remaining plan components. Therefore, the project would be consistent with the Climate Resilient SD Plan.

c. San Diego Association of Governments' 2021 Regional Plan

The project is a plan amendment that would include design elements and policies that support the policy objectives of the 2021 Regional Plan. The project would support the 2021 Regional Plan vision by providing improved pedestrian and bicycle facilities, including off-site connections with the surrounding community, and would make pedestrian and bicycle path improvements to a currently developed site. As discussed in Appendix L, the improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residents would serve to reduce vehicle miles traveled. The proposed project would improve the connection to the Rose Creek Bikeway, which is part of the 2050 Complete Corridor Bike Network and Arterials as proposed in the 2021 Regional Plan. The project would reduce overall development density on the site, which would decrease vehicle trips compared to the current baseline condition. The project would also help implement the habitat conservation vision of the 2021 Regional Plan because the project would implement wetland restoration and protect habitat areas. Further, equitable access to new coastal wetlands and dunes is possible with better access by bikes and by pedestrians to the Balboa Avenue Station, an identified Transit Priority Area. The project would not include any components that would conflict with implementation of the 2021 Regional Plan.

d. California Air Resources Board's Scoping Plan

The current adopted Scoping Plan was approved by CARB in December 2022. The previous 2017 Scoping Plan incorporated the 2030 target set by Executive Order B-30-15 and codified by Senate Bill 32. It identifies how to reach the 2030 climate target and substantially advance toward the state's 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels. The 2022 Scoping Plan Update assesses progress toward the statutory 2030 target and identifies a path to achieving carbon neutrality by 2045 (CARB 2022).

The 2022 Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The 2022 Scoping Plan is not directly applicable to specific projects. The project would comply with all applicable regulations adopted in furtherance of the 2022 Scoping Plan to the extent required by law and would therefore be consistent with the 2022 Scoping Plan strategies. The project would reduce development and vehicle trips compared to the existing baseline condition and would therefore be consistent with GHG reduction goals. Additionally, the 2022 Scoping Plan strategies relating to carbon

removal and sequestration emphasize the importance of natural and working lands to achieve carbon neutrality; in particular, wetlands are noted as an important tool in capturing carbon and holding it in coastal vegetation and soils. The project would increase wetland habitat restoration, which would support this strategy. Therefore, the project would be consistent with CARB's 2022 Scoping Plan.

5.4.4 Significance of Impacts

5.4.4.1 Greenhouse Gas Emissions

The significance of project GHG emissions is based on consistency with the City's CAP. As discussed in Section 5.4.2, the project would be consistent with the City's CAP; therefore, impacts would be less than significant, and no mitigation is required**.**

5.4.4.2 Conflicts with Plans or Policies

The project would be consistent with the City's General Plan, CAP, and Climate Resilient SD Plan. The project would not conflict with or prevent implementation of SANDAG's 2021 Regional Plan or CARB's 2022 Scoping Plan. Therefore, the project would not conflict with an applicable GHG plan or policy. Impacts would be less than significant, and no mitigation is required.

5.4.5 Mitigation Framework

Impacts related to GHG emissions would be less than significant; therefore, no mitigation is required.

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5.5 Hazards and Hazardous Materials

This section analyzes potential impacts related to hazards and hazardous materials, including public health and safety, that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021) and MBPMP Environmental Impact Report (EIR) (City of San Diego 1994), the Phase I Environmental Site Assessment (ESA) prepared for the project (Appendix F), and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022a).

5.5.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing hazards and hazardous materials conditions (Section 2.3.5, Hazards and Hazardous Materials) and Chapter 4.0, Regulatory Framework (Section 4.5, Hazards and Hazardous Materials), for a discussion of relevant plans, policies, and regulations related to public health and safety. In summary, the project area currently operates as an RV park and recreation destination. Existing development of the area includes parking lots, landscape vegetation, four ball diamonds, eight tennis/volleyball courts, an 18-hole golf course, a country club, community park amenities within De Anza Cove Park, trails for pedestrians and bicyclists, a boat and ski club, the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve, De Anza Cove, Fiesta Bay, and the Rose Creek inlet. No activities that currently occur in the project area are associated with the generation or production of hazardous materials.

5.5.2 Significance Determination Thresholds

Based on the City's Significance Determination Thresholds (City of San Diego 2022a), which have been adapted to guide a programmatic analysis of the project, a significant impact would occur if implementation of the project would:

1. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands;
2. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school;
3. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, creates a significant hazard to the public or environment; or
5. Result in a safety hazard for people residing or working in a designated airport influence area.

5.5.3 Impact Analysis

5.5.3.1 Issue 1: Wildland Fire Risk

Would the proposed project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The project area is within Local Responsibility Areas, in which local agencies and fire departments retain responsibility in the event of wildfires (City of San Diego 2009). Within the Local Responsibility Area, the project area falls outside the Very High Fire Hazard Severity Zone located within the City. The project area is surrounded by development, including commercial, residential, and recreational land uses. The project area also includes and is adjacent to marine waters of Mission Bay. These land use types do not contain wildland fuel sources likely to burn in the event of a wildfire, which significantly reduces the likelihood of wildfires impacting the project area. Similarly, the project would not create areas of substantial dry vegetation or forested areas, which have a higher probability to burn in the event of an urban wildfire. The project design allows for spaces between project components and neighboring buildings and vegetation. Defensible space between vegetated areas would decrease the spread of wildfires and reduce the risk.

The project would provide for guest accommodations, which could include campgrounds where campfires would be allowed in designated areas. Campfire areas would be limited to developed campgrounds and beach areas and would not be within heavily vegetated areas, which would reduce the risk of wildland fires. Fires allowed in beach areas shall be in accordance with the City's Municipal Code, Sections 63.20.5(c) and (d), which require the use of City-provided container rings. Campfires would be limited to the designated areas in the low-cost visitor guest accommodation areas.

The project would comply with local fire emergency protocols and local emergency evacuation and disaster plans in the event of a wildfire or emergency. The project's impact on wildland fire risk would be less than significant.

5.5.3.2 Issue 2: Hazardous Emissions and Materials

Would the proposed project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?

No schools are within the project area. Mission Bay High School is immediately north and west of the project area. Equipment used during project grading and construction could result in incidental spills of petroleum products and hazardous substances. Such spills would be contained on site in accordance with a required Stormwater Pollution Prevention Plan (see Section 5.7, Hydrology and Water Quality). As such, the adjacent high school would not be affected by such incidental releases. Similarly, the project would not introduce any land uses, such as industrial, that could result in hazardous emissions or exposure of schools to hazardous materials.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in

accordance with applicable requirements and regulations. No construction would be permitted to occur at such locations until a "no further action" clearance letter from the County of San Diego (County) Department of Environmental Health, or similar determination is issued by the San Diego Fire Department, California Department of Toxic Substance Control, Regional Water Quality Control Board, or other responsible agency. The current regulatory environment of City, state, and federal requirements provides a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Additionally, existing conditions in the project area show no conflict between existing school sites and open hazardous materials sites (see Issue 4, Hazardous Materials Sites). Therefore, impacts to schools from hazardous materials, substances, or waste associated with the project would be less than significant.

5.5.3.3 Issue 3: Emergency Plan Consistency

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

The San Diego County Emergency Operations Plan identifies a broad range of potential hazards and a response plan for public protection (County of San Diego 2022b). The plan identifies major interstates and highways within the County that could be used as primary routes for evacuation, including Interstate 5 located east of the project area. The project land uses would use Interstate 5 to access the project area, similar to the existing uses on site.

The project's design would be consistent with the City's Municipal Code standards for emergency vehicle access, and no components would impair the implementation of or compliance with an adopted evacuation plan. The project would not alter existing transportation facilities that have been identified as emergency routes, or have been otherwise identified for use during an emergency, or existing emergency plan routes. The project land uses would bring visitors to the project area for short periods, similar to the existing uses on site. Visitors would arrive on foot or by bicycle, passenger vehicle, or public transportation. Visitors would be required to leave the project area during an emergency evacuation event. The project would comply with the County Emergency Operations Plan and would not interfere with a response to disaster situations, including impairment of Interstate 5 in an emergency. Therefore, impacts related to impairment of an adopted Emergency Response Plan or Evacuation Plan would be less than significant.

5.5.3.4 Issue 4: Hazardous Materials Sites

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

Hazardous materials are commonly used by many land uses such as industrial, retail/office, commercial, residential, agriculture, medical, and recreation.

a. Construction

Construction equipment that would be used to build the project has the potential to release oils, greases, solvents, and other finishing materials through accidental spills. Spill or upset of these materials could have the potential to impact surrounding land uses. Spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable state and local regulations, including the California Health and Safety Code and the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division for the cleanup and disposal of that contaminant. A Spill Prevention and Control Plan that includes standard operating procedures for spill prevention, hazard assessment, spill prevention and containment, emergency response procedures, and closure of the spill incident would be prepared. Compliance with state and local regulations would minimize the potential for the accidental release or upset of hazardous materials, ensuring public safety.

A Phase I ESA was conducted for the project and included a review of historical source information, a search of regulatory agency databases within specified distances of the subject property, a review of available local agency records, interviews, and a site reconnaissance (Appendix F). According to a search of federal, state, and local regulatory databases, the project area is not on a list of hazardous materials sites compiled pursuant to California Government Code, Section 65962.5. Based on the environmental database search completed for the project-specific Phase I ESA (Appendix F), three underground storage tanks were removed from the Campland on the Bay (Campland) area in 1986. One of the tanks failed a leak test, and potentially impacted soil was removed. No soil sample results were reported; however, the case was closed in 1988. Although the case was closed over 30 years ago, impacted soil may be present in the area where the underground storage tanks were removed in the Campland area. Encountering soil contamination during grading and excavations could result in potentially significant hazards and hazardous materials impacts to on-site construction personnel. In addition, placement of these contaminated soils for use as fill in other areas of the project area could result in cross-contamination of existing clean areas. It is anticipated that earthen material would be moved from the Campland area during grading and demolition and used as fill in other areas of De Anza Cove.

If contamination is discovered, work shall be discontinued until appropriate hazards and hazardous materials procedures are implemented. The project would be required to follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. Any contaminated soil shall be removed and disposed of in accordance with requirements by the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites. Old electrical transformers that typically contain polychlorinated biphenyl (PCB), which is a hazardous substance, were observed on the project area. Soil staining was observed at the base of a pole-mounted electrical transformer in the former mobile home park, suggesting a possible PCB spill. Other transformers at the mobile home park site may also contain PCBs. Encountering PCB-contaminated soil during grading could result in adverse hazards and hazardous materials impacts and cross-contamination to currently clean areas. All PCB-laden soils and electrical transformers to be removed/demolished as part of the project must be disposed of as hazardous waste per federal, state, and local requirements.

Debris, trash, soil staining, and ash were observed as part of the Phase I ESA (Appendix F) in an area called the "Boneyard," which is used as a staging area for the dismantling/demolishing of the former mobile home park, which is located in the De Anza Cove developed area. The City is in the process of removing the trailers and cleaning up the area. Chemicals collected from around the former mobile home park, including but not limited to paint and motor oil, are temporarily stored on a concrete pad at the Boneyard. Refer to Appendix F for further details. In addition, the Boneyard was reportedly a waste collection/storage area for the former mobile home park. Therefore, contaminated soils may be present in this area of the project area.

Although releases were not documented, the following areas of potential soil contamination were noted in the Phase I ESA (Appendix F):

- Campland, Mission Bay Golf Course, De Anza Cove mobile home park, and Mission Bay RV Resort all have hazardous materials stored on site. Stained pavement and soil were observed in some of these areas.
- Soil staining was observed in connection with a hydraulic lift at the Mission Bay Golf Course maintenance area. There may be impacts to the subsurface from the hydraulic lift.
- There were detections of copper, zinc, and lead in sediment samples from the Rose Creek inlet that indicated potential toxicity concerns.

b. Operation

Operation of the project would involve an unquantifiable, but limited, use of potentially hazardous materials typical of recreational uses, including cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and fertilizers and/or pesticides for landscaping. These materials would be contained, stored, and used on site in accordance with manufacturers' instructions, applicable standards, and federal, state, and local regulations. Compliance with applicable regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials. Therefore, operation-related activities would not create a significant hazard to the public or environment.

As a result of these existing conditions, construction impacts associated with potentially encountering contaminated soil during grading and excavation would be potentially significant (**Impact 5.5-1**).

Impact 5.5-1 Construction of the project could encounter contaminated soils during grading and excavation, which could result in adverse hazards and hazardous materials impacts to on-site construction/grading personnel and cross-contamination of soils in the event that contaminated soil is placed as fill in currently uncontaminated areas.

5.5.3.5 Issue 5: Aircraft-Related Hazards

Would the proposed project result in a safety hazard for people residing or working in a designated airport influence area?

The nearest airports to the project area are the Montgomery-Gibbs Executive Airport, approximately 4 miles northeast, and the San Diego International Airport, approximately 4 miles south. Both airports have adopted Airport Land Use Compatibility Plans. However, the project area is not located within the

airport influence area (AIA) of either airport; therefore, it would not be subject to either Airport Land Use Compatibility Plan (SDCRRA 2014). Additionally, the project area does not trigger the notification criteria of the Federal Aviation Administration as defined by the Code of Federal Regulations, Title 14, Part 77, because construction in the project area would not exceed 200 feet unless the Federal Aviation Administration chooses to request notification.

The project would provide guest accommodations, which may include campgrounds where campfires would be allowed in designated areas. Pursuant to the City's recreational fire and beach fire regulations, no campfires would be allowed outside these designated areas, and no campfires would be allowed to be of such a size to cause a significant column of smoke that could impede visibility to aircraft. Fires allowed in beach areas shall be in accordance with the City's Municipal Code, Sections 63.20.5(c) and (d), which require the use of City-provided container rings. Campfires would be limited to the designated areas in the low-cost visitor guest accommodation areas.

Implementation of the project would include the restoration of approximately 140.5 acres of marshland/wetland habitat. This feature of the project would create habitat for wildlife, including waterfowl, which may create bird strike hazards for low-flying aircraft in the vicinity. However, due to the distance of the project area from the nearest airport (approximately 4 miles), it is unlikely that this would pose a significant impact on aircraft. Additionally, as previously stated, the project area is not located within a designated AIA. Therefore, impacts resulting in a safety hazard for people residing or working in a designated AIA would be less than significant.

5.5.4 Significance of Impacts

5.5.4.1 Wildland Fire Risk

The potential for hazards related to wildland fires to visitors of the project area and nearby residences and businesses is considered less than significant due to project design, policies, regulations, and project components that would not increase wildland fire hazards. Impacts would be less than significant, and no mitigation is required.

5.5.4.2 Hazardous Emissions and Materials

The project would not introduce land uses that would be likely to result in hazardous emissions or exposure of schools to hazardous materials, substances, or waste. As such, the adjacent school would not be adversely affected by project construction. Therefore, impacts would be less than significant, and no mitigation is required.

5.5.4.3 Emergency Plan Consistency

The project would not impair the implementation of or compliance with an adopted Emergency Response/Evacuation Plan. The project would comply with the County's Emergency Response Plan. Therefore, impacts would be less than significant, and no mitigation is required.

5.5.4.4 Hazardous Materials Sites

The project could potentially result in encountering contaminated soil during grading and excavation, which could result in adverse hazards and hazardous materials impacts to on-site construction/ grading personnel and cross-contamination in the event that contaminated soil is placed as fill in currently uncontaminated areas (**Impact 5.5-1**). Impacts would be potentially significant but mitigable with implementation of the mitigation measures provided in Section 5.5.5, Mitigation Framework.

5.5.4.5 Aircraft-Related Hazards

The project area is not located within the designated AIA of nearby airports. Project components would not result in a safety hazard for people residing or working in a designated AIA. Therefore, impacts from aircraft-related hazards would be less than significant, and no mitigation is required.

5.5.5 Mitigation Framework

To reduce **Impact 5.5-1** to below a level of significance, the following mitigation measures shall be implemented as part of the project. Implementation of these mitigation measures would ensure that transformers are removed and properly disposed of per regulatory requirements, testing of soils occurs prior to construction, procedures are in place for the management of potentially impacted soil, and chemicals have been properly stored and disposed of in accordance with applicable local, state, and federal guidelines and/or regulations.

MM HAZ 5.5-1 **Electrical Transformers.** Prior to any construction or grading activities in project areas containing electrical transformers, construction contractors shall test all on-site electrical transformers for the presence of polychlorinated biphenyls. If polychlorinated biphenyls are detected, hazards and hazardous materials measures shall be implemented per federal and state regulatory requirements until the electrical transformers are removed and disposed of properly.

MM HAZ 5.5-2 **Soil Sampling.** Prior to any construction or grading activities in areas of documented soil staining and contaminated soil, including in the vicinity of the former De Anza Cove mobile home park Boneyard, former Campland on the Bay area underground storage tanks, Mission Bay Golf Course hydraulic lift, and electrical transformers, construction contractors shall complete soil sampling to determine whether contamination is present. If elevated concentrations of contaminants (e.g., petroleum compounds, metals, hazardous waste) are present in on-site soils, contaminated soil shall be removed and disposed in accordance with requirements of the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites.

MM HAZ 5.5-3 **Contingency Plan.** Prior to the issuance of any construction or grading permits, the project engineer shall ensure that a hazardous material contingency plan is prepared and reviewed to specify procedures for the management of potentially impacted soil (and groundwater) encountered during project construction or demolition. If elevated concentrations of contaminants are detected (i.e., soil discoloration, odor, petroleum

sheen, positive photoionization detector readings) in on-site soils during grading and excavation, contaminated soil shall be removed and disposed of in accordance with requirements by the County of San Diego Department of Environmental Health and Quality Hazardous Materials Division.

MM HAZ 5.5-4 **Chemical Disposal and Storage.** Prior to the start of future project construction or demolition, any chemicals and potentially hazardous debris in the project area due to prior site use and/or project construction shall be properly characterized and disposed of by City staff or construction contractors in accordance with applicable local, state, and federal guidelines and regulations. All hazardous materials stored and used during construction, including but not limited to fuels, batteries, petroleum products, cleaners, disinfectants, lubricants, and refuse, shall be stored with secondary containment to avoid contaminating the project area.

5.5.6 Significance of Impacts After Mitigation

Impact 5.5-1, relating to hazardous materials sites, would be potentially significant. However, implementation of Mitigation Measures **MM HAZ 5.5-1** through **MM HAZ 5.5-4** would reduce impacts to a less than significant level.

5.6 Historical, Archaeological, and Tribal Cultural Resources

This section analyzes potential impacts related to historical, archaeological, and Tribal Cultural Resources (TCRs) that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on a review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021) and MBPMP Environmental Impact Report (EIR) (City of San Diego 1994), the Cultural Resources Constraints Technical Memorandum prepared by Harris & Associates (2023) (Appendix G) for the project, the Historical Resources Constraints Technical Memorandum prepared by Harris & Associates (2023) (Appendix H) for the project, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022a).

5.6.1 Existing Conditions

Refer to Chapter 2.0, Environmental Setting, for a discussion of the existing conditions related to historical and archaeological resources and TCRs (Section 2.3.6, Historical, Archaeological, and Tribal Cultural Resources) and Chapter 4.0, Regulatory Framework (Section 4.6, Historical, Archaeological, and Tribal Cultural Resources), for a discussion of relevant plans, policies, and regulations related to historical and archaeological resources and TCRs. In summary, the South Coastal Information Center records search identified a total of 64 cultural resources within 0.25 mile of the project area, two of which are within the project area. The site survey did not identify any new cultural resources or relocate the previously recorded cultural resources. The California Native American Heritage Commission (NAHC) Sacred Lands File search identified that no sacred lands are present within the project area.

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a time frame of at least the last 10,000 years and include both prehistoric and historic periods. For the purposes of this Program Environmental Impact Report (PEIR), historical resources consist of archaeological sites and built environment resources determined significant under CEQA.

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil and the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Historic archaeological resources are those originating after European contact.

These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

A TCR is defined in California Public Resources Code, Section 21074, as a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a Native American Tribe and is either on or eligible for listing on the national, state, or a local historic register as defined in California Public Resources Code, Section 5020.1(k), or which the lead agency, at its discretion, chooses to identify as a TCR according California Public Resources Code, Section 5024.1(c).

Refer to Section 2.3.6 for a complete description of human occupation in the San Diego region and in the project area.

5.6.2 Significance Determination Thresholds

5.6.2.1 Historical Resources

Historical resources significance determination, pursuant to the City's CEQA Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, second, determining direct and indirect impacts that would result from project implementation. The City's CEQA Significance Determination Thresholds define a significant historical resource as one that qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under California Public Resources Code, Section 5024.1(g), although even a resource that is not listed in or determined eligible for listing in the California Register of Historical Resources, not included in a local register, or not deemed significant in a historical resource survey may nonetheless be historically significant for the purposes of CEQA (City of San Diego 2022a). The City's Historical Resources Guidelines (City of San Diego 2022b) state that the significance of a resource may be determined based on the potential for the resource to address important research questions as documented in a site--specific technical report prepared as part of the environmental review process.

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022a), which have been adapted to guide a programmatic analysis of the project, a significant impact regarding historical resources could occur if implementation of the project would result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site.

As a baseline, the City has established the following criteria to be used in the determination of significance for an archaeological resource under CEQA:

> An archaeological site must consist of at least three associated artifacts/ecofacts (within a 50 square meter area) or a single feature and must be at least 45 years of age. Archaeological sites containing only a surface component are generally considered not significant, unless demonstrated otherwise. Such site types may include isolated finds, bedrock milling stations, sparse lithic scatters, and shellfish processing stations. All other archaeological sites are considered potentially significant. The determination of significance is based on a number of factors specific to a particular site including site size, type, and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and

ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness, and integrity.

A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the mythology of a discrete ethnic population.

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022a), which have been adapted to guide a programmatic analysis of the project, a significant impact regarding to archaeological resources could occur if implementation of the project would result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside formal cemeteries.

5.6.2.2 Tribal Cultural Resources

CEQA was amended in 2014 through Assembly Bill (AB) 52, which created a new category of "Tribal Cultural Resources" that must be considered under CEQA, and applies to all projects that file a Notice of Preparation or Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of a project if that Tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination of whether a Negative Declaration, Mitigated Negative Declaration, or EIR will be prepared. If a Tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the Tribe. AB 52 also specifies mitigation measures that may be considered to avoid or minimize impacts on TCRs. Specifically, California Public Resources Code, Section 21074, provides the following guidance:

(a) "Tribal cultural resources" are either of the following:

(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

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

(b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.

(c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

Based on the City's CEQA Significance Determination Thresholds (City of San Diego 2022a), which have been adapted to guide a programmatic analysis of the project, a significant impact regarding TCRs could occur if implementation of the project would result in:

1. A substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
   a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
   b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.6.3 Impact Analysis

5.6.3.1 Issue 1: Historic Buildings, Structures, Objects, or Sites

Would the proposed project result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, object, or site?

A preliminary site survey was conducted on August 15, 2018, to identify potential historical resources within the project area (Appendix H). Combined with subsequent preliminary research, six facilities within the project area contain buildings and/or structures over 45 years old:

1. Mission Bay Golf Course and Practice Center (c. 1955)
2. Pacific Beach Tennis Club (c. 1961)
3. Mission Bay RV Resort (c. 1955)
4. De Anza Cove mobile home park, including homes and administration buildings (c. 1965)
5. Campland on the Bay (Campland) (c. 1969)
6. Mission Bay Boat and Ski Club (c. 1963)

Currently, no designated historical resources are within the project area. However, unevaluated resources may be found to be significant and eligible for designation, including the six facilities listed above, if project-level site-specific analysis reveals that one or more of these buildings meets the criteria for listing on the National Register of Historic Places, California Register of Historical Resources, or the San Diego Historic Register of Historical Resources. The project envisions

conceptual-level improvements to the project area that may result in the alteration or demolition of potentially historic built environment resources, including the Mission Bay RV Resort, De Anza Cove mobile home park, Campland, and Mission Bay Boat and Ski Club. The existing Campland property would be converted to natural habitat area, as anticipated in the MBPMP. This would involve the demolition of the developed area within Campland, including structures, pavement, and utilities and the adjacent boat docks to the south. Construction of a multi-use path within the project area would require paving, construction of guest accommodations would require demolition and removal of the existing mobile homes, and construction of low-cost visitor-serving RV sites, cabins, or other eco-friendly accommodations, landscaping, and restrooms. The site of the Mission Bay RV Resort would be cleared for the new guest accommodation facility. While most existing recreational opportunities in the northern portion of the project area would be retained, the Mission Bay Boat and Ski Club would be replaced with wetlands and buffers adjacent to the Rose Creek inlet and with additional athletic uses and passive park features. The combination and layout of recreation and athletic facilities, including the Mission Bay Golf Course and Practice Center and Pacific Beach Tennis Club, would be designed during the General Development Plan process and at the time of redevelopment and implementation of project enhancements.

The City's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for project-level historical resources evaluation/analysis and, when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources, such as designated historical resources, historic buildings, districts, landscapes, objects, and structures, important archaeological sites, TCRs, and Traditional Cultural Properties are subject to site-specific review in accordance with the City's Historical Resources regulations and Historical Resources Guidelines.

Since these improvements remain conceptual, may be further refined, and may not occur for a number of years, depending on available resources, an in-depth analysis at this programmatic stage may become outdated at the time of implementation of any particular component of the project. However, future development within the project area would be reviewed for conformance with the City's Historical Resources regulations (City's Municipal Code, Chapter 14, Article 3, Division 2). The City's Historical Resources regulations include a number of requirements that would apply to future development evaluated under the proposed project and that would ensure site-specific surveys are completed to verify the presence of historical resources. Pursuant to the City's Municipal Code, Section 143.0212(a), the City Manager shall determine the need for a site-specific survey for the purposes of obtaining a construction permit or development permit for development proposed for any parcel containing a structure that is 45 or more years old and not located within any area identified as exempt in the Historical Resources Guidelines of the Land Development Manual or for any parcel identified as sensitive on the Historical Resource Sensitivity Maps. A site-specific survey shall be required when it is determined that a historical resource may exist on the parcel where the development is located and if the development proposes a substantial alteration according to the City's Municipal Code, Section 143.0250(a)(3) (City's Municipal Code, Section 143.0212[c]). If a site-specific survey is required, it shall be conducted consistent with the Historical Resources Guidelines of the Land Development Manual (City's Municipal Code, Section 143.0212[d]). Adherence to the Historical Resources regulations and Guidelines would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources,

data recovery, and repatriation or curation of artifacts, among other requirements detailed in the City's Historical Resources Guidelines.

While the City's Municipal Code provides for the regulation and protection of designated and potential historical resources, it is not possible to ensure the successful preservation of all historic built environment resources within the project area at a programmatic level. Although specific detailed development is not proposed at this time, future implementation and related construction activities facilitated at the project level could result in the alteration of a historic building, structure, object, or site. Direct impacts of specific future projects may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, sites, and districts. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting when the setting contributes to the resource's significance.

Implementation of the project could result in the alteration of a historic building, structure, object, or site (**Impact 5.6-1**). This impact would be potentially significant.

Impact 5.6-1 Demolition activities associated with future implementation of the project could potentially result in impacts to historical resources.

5.6.3.2 Issue 2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Would the proposed project result in a substantial adverse change in the significance of a prehistoric or historic archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?

The project area is highly developed, and the entire area has been previously surveyed for archaeological resources. The South Coastal Information Center records search resulted in the identification of two archaeological resources located within the project area: P-37-005017 and P-37-011571, both of which are of high interest to the local Native American Kumeyaay community because of their proximity to the project area, including the Ethnohistoric village of *La Rinconada de Jamo (*P-37-005017). Archival review of P-37-005017, *La Rinconada de Jamo*, which contains rich prehistoric habitation midden deposits, suggests that the concentration of the site is north of the project area. The site has been recommended eligible for listing in the National Register under Criterion (d)—has yielded, or may be likely to yield, information important in prehistory or history—and eligible for listing in the California Register under Criterion (d) as a significance resource under CEQA. The existing Mission Bay Tennis Center, Athletic Fields, and Golf Course components of the project area are in a moderate cultural sensitivity area due to the presence of P-37-005017. Recent geoarchaeological testing shows that the Mission Bay Tennis Center, Athletic Fields, and Golf Course is underlain by 8 feet of artificial fill. Native soil was closer to the surface in the northeastern segment of the golf course. Previous reports recommended cultural monitoring for ground disturbance in the northeastern section of the golf course containing shallow native soils or in areas where disturbance would be greater than 8 feet deep in the rest of the golf course. Additional analysis would be required in any ground disturbance in the shallow native soils of the northeastern portion of the golf course and if ground disturbance extends beyond 8 feet in the Mission Bay Tennis Center, Athletic Fields, and

remaining areas of the Golf Course components of the project. Therefore, implementation of the project could potentially impact P-37-005017 through ground disturbance or alteration.

P-37-011571 (Crown Point) consists of a widely dispersed prehistoric lithic and marine shell scatter from intermittent camping during seasonal use of the area by coastal Kumeyaay people encompassing the Crown Point area of Pacific Beach. This large resource boundary intersects the westernmost extent of the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP) portion of the area of potential effect (APE). The project proposes to preserve the existing KFMR/NWP as a natural area. The project would include some restoration and enhancement within the City-owned portions of KFMR/NWP. In the westernmost extent of the City-owned portion of the KFMR/NWP, any work would be limited to enhancement activities using non-motorized equipment and hand tools for removal of invasive species. Implementation of the project could potentially impact P-37-011571 through minor ground disturbance or alteration.

The Campland, former mobile home park, and Mission Bay RV Resort components of the project area are constructed on human-made land and void of resources. Furthermore, no new resources were identified during the pedestrian survey for the project. Due to this low sensitivity, no further cultural review or monitoring within these areas of the project area would be required.

Avoiding impacts to religious or sacred places or human remains may not be possible when resources are discovered during construction. Although there are no known religious or sacred uses within the project area, the potential exists for these resources to be encountered during future construction activities, particularly given the cultural sensitivity and importance of the area that was discussed during Tribal consultation with respect to the Ethnohistoric village of *La Rinconada de Jamo* (P-37-005017), where human remains have previously been encountered.

Undiscovered human remains, particularly those interred outside formal cemeteries, could be disturbed during grading, excavation, or other ground-disturbing activities associated implementation of the project. The treatment and disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is regulated by California Public Resources Code, Section 5097.98, as amended by AB 2641, which addresses the disposition of Native American burials, protects remains, and appoints the NAHC to resolve disputes. In addition, California Health and Safety Code, Section 7050.5, includes specific provisions for the protection of human remains in the event of discovery, and Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The California Health and Safety Code is applicable to any project where ground disturbance would occur.

The project would comply with applicable federal, state, and local regulations, including the City's Municipal Code and General Plan policies that provide for the regulation and protection of prehistoric and historic archaeological resources and human remains. However, it is not possible at a program level of analysis to ensure the successful preservation of all prehistoric and historic archaeological resources and human remains because there may be some unknown resources disturbed during excavation due to the cultural sensitivity of the area. Figure 5.6-1, Sensitivity Map, depicts the cultural sensitivity of the project area:

- **Low Sensitivity:** These areas contain few or no previously recorded cultural resources, their surfaces and subsurfaces have been completely developed, or they consist of human-made

lands. These areas have a low potential to contain cultural resources and do not require further analysis or mitigation.

- **Moderate Sensitivity:** These areas contain recorded cultural resources or have the potential for resources to be encountered, or the significance of the cultural resources within these areas is not known. Based on information obtained from prior geoarchaeological studies conducted within the Mission Bay Tennis Center, Athletic Fields, and Golf Course and the KFMR/NWP portion of the project area, if a project requires grading in native soils in the northeastern portion of the golf course or exceeding 8 feet in depth in the other areas identified, additional analysis would be required, as intact cultural deposits could be identified in native soils. This could include a testing program to further define resource boundaries and subsurface presence or absence and determine the level of significance. Mitigation measures such as an Archaeological Data Recovery Program and construction monitoring shall also be required. If a project proposes ground-disturbing activities in remaining portions of the project area, including Campland and the De Anza Cove developed area, additional analysis may be required based on project scope due to the potential identification of cultural deposits in the native soils, in which case mitigation measures, such as construction monitoring, may be required.

Therefore, implementation of the project could adversely impact prehistoric or historic archaeological resources, including unknown religious or sacred use sites and human remains. This impact would be potentially significant (**Impact 5.6-2**).

Impact 5.6-2 Ground-disturbing activities associated with construction of the project would be in or near culturally sensitive areas in the northeastern segment of the golf course and northwestern extent of the KFMR/NWP, including unknown resource discoveries during excavation into native soils, and could result in impacts to prehistoric and historic archaeological resources, sacred sites, and human remains, including those interred outside formal cemeteries.

5.6.3.3 Issue 3: Tribal Cultural Resources

Would the proposed project result in a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or*
2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Native American consultation was conducted for the project to identify TCRs and develop adequate treatment and mitigation measures for significant archaeological sites with cultural and religious significance to the Native American community in accordance with all applicable local, state, and

federal regulations and guidelines. This was accomplished pursuant to the provisions of Senate Bill 18 in November 2018 for the project. However, no requests for consultation under Senate Bill 18 were made to the City. Additional notices will be sent concurrently with the release of the Draft EIR and 10 days prior to the San Diego City Council hearing on the project. Tribal consultation in accordance with AB 52 was conducted on February 1, 2019, and March 13, 2019, with Lisa Cumper, Tribal Historic Preservation Officer from the Jamul Indian Village and Clint Linton, Director of Cultural Resources from the Iipay Nation of Santa Ysabel, as further described below. Additional Tribal consultation pursuant to AB 52 was also initiated in late 2022 and is ongoing.

While much of the project area has been developed for recreational uses such as camping, tennis, golf, and water sports, it also includes an abandoned mobile home park, RV and boat storage yards, and the KFMR/NWP. Past dredging and filling activities that created Mission Bay Park and disrupted the course of the San Diego River also changed the cultural landscape of the area used over thousands of years by the Kumeyaay people from the nearby villages of *La Rinconada de Jamo, Onap*, and *Kosa'aay.*

Recent geoarchaeological testing shows that the Mission Bay Tennis Center, Athletic Fields, and Golf Course are underlain by 8 feet of artificial fill. Native soil was located closer to the surface in the northeastern segment of the golf course. Previous reports recommended cultural monitoring for ground disturbance in the northeastern section of the golf course containing shallow native soils or in areas where disturbance would be greater than 8 feet deep in the rest of the golf course.

The project also proposes preservation of the KFMR/NWP portion of the project area. Restoration and enhancement activities proposed within the City-owned portions of the KFMR/NWP could adversely affect an adjacent recorded archaeological site (P-37-011571), which consists of marine shell and lithic artifacts from intermittent camping during seasonal use of the area by coastal Kumeyaay people. Archaeological testing and monitoring in this area has yielded materials that can also be defined as a TCR.

The Sacred Lands File search requested from the NAHC indicated that although the search was negative for sacred lands or Native American cultural resources, the absence of specific resource information in the Sacred Lands File does not preclude the presence of Native American cultural resources in the project area. In addition to the South Coastal Information Center records search and NAHC Sacred Lands File search, a field survey was conducted with Native American Kumeyaay monitor participation, and no new information was obtained regarding existing sites within the project area. Despite the negative survey results, archaeological resources and TCRs are known to exist in the project area, and for this reason, the local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources including the village of *La Rinconada de Jamo (*P-37-005017) and Crown Point (P-37-011571), portions of which are within or adjacent to the project area. Proximity to these two resources were discussed during Tribal consultation, along with the project scope in general, and the proposed mitigation framework for archaeological resources and TCRs. Clint Linton reviewed the materials and did not have any concerns with the program-level analysis and subsequent mitigation framework; however, he provided additional feedback that included a request to expand the Tribal context discussion and recommendations for areas of sensitivity. Lisa Cumper concurred with these recommendations, as did City staff, and Tribal consultation was concluded.

With respect to TCRs, for subsequent activities implemented in accordance with the project where a recorded archaeological site or TCR (as defined in the California Public Resources Code) is identified, the City would initiate consultation with identified California Native American Tribes pursuant to the provisions in California Public Resources Code, Sections 21080.3.1 and 21080.3.2, in accordance with AB 52.

The project would comply with applicable regulations and the City's Municipal Code, which would provide for the regulation and protection of TCRs and would reduce and/or minimize potential impacts. However, it is not possible to ensure the successful preservation of all TCRs because there may be some unknown resources disturbed during excavation due to the cultural sensitivity of the area (see Figure 5.6-1, which illustrates the cultural sensitivity of the project area). Therefore, implementation of the project could adversely impact TCRs, and impacts would be potentially significant (**Impact 5.6-3**).

Impact 5.6-3 Ground-disturbing activities associated with construction of the project would be located in or near culturally sensitive areas important to Native American Tribes and could result in impacts to Tribal Cultural Resources.

5.6.4 Significance of Impacts

5.6.4.1 Historic Buildings, Structures, Objects, or Sites

Implementation of the project could result in the alteration of a historic building, structure, object, or site (**Impact 5.6-1**). This impact would be potentially significant.

5.6.4.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Ground-disturbing activities associated with construction of the project would be located in or near culturally sensitive areas in the northeastern segment of the golf course and northwestern extent of the KFMR/NWP (see Figure 5.6-1), could include unknown resource discoveries during excavation into native soils, and could result in impacts to prehistoric and historic archaeological resources, sacred sites, and human remains, including those interred outside formal cemeteries (**Impact 5.6-2**). This impact would be potentially significant.

5.6.4.3 Tribal Cultural Resources

Ground-disturbing activities associated with construction of the project would be located in or near culturally sensitive areas important to Native American Tribes and could result in impacts to TCRs (**Impact 5.6-3**). This impact would be potentially significant.

5.6.5 Mitigation Framework

The City's General Plan, combined with federal, state, and local regulations, provides a regulatory framework for project-level historical resources evaluation/analysis and, when applicable, mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources, such as designated historical resources, historic buildings, districts, landscapes, objects, and structures, important archaeological sites, TCRs, and Traditional Cultural Properties are subject to site-

specific review in accordance with the City's Historical Resources regulations and Historical Resources Guidelines through a subsequent project review process. To reduce the potential adverse impact to historic buildings, structures, objects, and sites associated with implementation of the project, the project would be subject to the City's Municipal Code, Section 143.0212, which requires review of all building, demolition, or entitlement applications impacting a building 45 years old or older to determine whether historical resources exist in the project area prior to issuance of the permit. However, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, impacts to historic buildings, structures, objects, or sites would remain significant and unavoidable.

To reduce the potential adverse impact to prehistoric or historic archaeological resources, sacred sites, human remains, and TCRs, the following mitigation measure would be applied. However, even with application of the existing regulatory framework and mitigation framework, impacts to prehistoric and historic archaeological resources, sacred sites, human remains, and TCRs would remain significant and unavoidable.

MM HIST 5.6-1 Prehistoric and Historic Archaeological Resources, Sacred Sites, Human Remains, and Tribal Cultural Resources. Prior to issuance of any permit for a future development project implemented in accordance with the proposed project that could directly affect an archaeological or Tribal Cultural Resource in the areas depicted on Figure 5.6-1, Sensitivity Map, including habitat restoration areas, the City of San Diego shall require that the following steps be taken based on the project scope to determine (1) the presence of archaeological or Tribal Cultural Resources and (2) the appropriate level of analysis or mitigation for any significant resources that may be impacted by a development activity. Sites may include but not be limited to privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include sites associated with prehistoric Native American activities.

Initial Determination

The environmental analyst shall determine the likelihood for the project area to contain archaeological or Tribal Cultural Resources by reviewing the site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory Database, South Coastal Information Center records, and the City's Historical Inventory of Important Architects, Structures, and People in San Diego) and may conduct a site visit. A Cultural Resources Sensitivity Map was created from the record search data obtained through the California Historical Resources Inventory System for use as a management tool to aid in the review of future projects within the project area that depicts two levels of sensitivity (Figure 5.6-1). Review of this map shall be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. The Cultural Resources Sensitivity Map, which is not part of any federal or state law, identifies areas of low and moderate cultural resources sensitivity. Areas with low sensitivity do not require further analysis or mitigation. Areas with moderate

sensitivity contain recorded cultural resources or have the potential for resources to be encountered, or the significance of the cultural resources within these areas is not known. If there is any evidence that the project area contains archaeological or Tribal Cultural Resources, then an archaeological evaluation consistent with the City's Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1

Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources or is located within a moderate sensitivity area, preparation of an evaluation report shall be required. The evaluation report could generally include background research, field survey, archaeological testing, and analysis. Before field reconnaissance occurs, background research shall be required that shall include a record search at the South Coastal Information Center at San Diego State University. A review of the Sacred Lands File maintained by the California Native American Heritage Commission shall also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any Tribal repositories or museums.

Once background research is complete, a field reconnaissance shall be conducted by individuals whose qualifications meet City of San Diego standards. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including but not limited to remote sensing, ground-penetrating radar, human remains detection canines, lidar, and other soil resistivity techniques as determined on a case-by-case basis by the Tribal representative during the project-specific Assembly Bill 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project area contains prehistoric archaeological resources or Tribal Cultural Resources. If, through background research and field surveys, resources are identified, then an evaluation of significance, based on the City Guidelines, shall be performed by a qualified archaeologist.

Step 2

Where a recorded archaeological site or Tribal Cultural Resource (as defined in the California Public Resources Code) is identified, the City of San Diego shall initiate consultation with identified California Native American Tribes pursuant to the provisions in California Public Resources Code, Sections 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52. During the consultation process, Tribal representatives shall be involved in making recommendations regarding the significance of a Tribal Cultural Resource that could also be a prehistoric archaeological site. A testing program may be recommended that requires re-evaluation of the project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring

(as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City of San Diego's Historical Resources Guidelines. Results of the consultation process shall determine the nature and extent of any additional archaeological evaluation or changes to the project.

The results from the testing program shall be evaluated against the significance thresholds found in the City of San Diego's Historical Resources Guidelines. If significant historical resources are identified within the area of potential effect, the site may be eligible for local designation. However, this process shall not proceed until Tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report shall be submitted to Historical Resources Board staff for designation.

An agreement with each consulting Tribe on the appropriate form of mitigation shall be required prior to distribution of a draft environmental document prepared for the proposed project. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate California Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicate that there is still the potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring shall be required.

Step 3

Per the City's Historical Resources Guidelines, the preferred mitigation for archaeological resources is to avoid and preserve the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not feasible, a Research Design and Archaeological Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When Tribal Cultural Resources are present and also cannot be avoided, appropriate and feasible mitigation shall be determined through the Tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and subject to the provisions as outlined in California Environmental Quality Act Guidelines, Section 15126.4(b)(3)(C-D). The data recovery program must be reviewed and approved by the City's assigned environmental analyst prior to distribution of a draft environmental document for

subsequent activities consistent with the project and shall include the results of the Tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as existing development or dense vegetation.

A Native American observer shall be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities whenever a Tribal Cultural Resource or any archaeological site located on City of San Diego property, or within the area of potential effect of a City of San Diego project, would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code, Section 5097.98, shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area, and the procedures set forth in California Public Resources Code, Section 5097.98; California Health and Safety Code, Section 7050.5; and applicable federal, state, and local regulations shall be followed. These procedures shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4

Archaeological Resource Management Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B, Historical Resources Consultant Qualifications, of the City of San Diego's Historical Resources Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as Traditional Cultural Properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts shall be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the City of San Diego's Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs if required.

Archaeological Resource Management Reports shall be prepared in conformance with the California Office of Historic Preservation's Archaeological Resource Management Reports: Recommended Contents and Format (see Appendix C of the City of San Diego's Historical Resources Guidelines), which will be used by City of San Diego staff in the review of

archaeological resource reports. Consultants must ensure that Archaeological Resource Management Reports are prepared consistent with this checklist. This requirement shall standardize the content and format of all archaeological technical reports submitted to the City of San Diego. A confidential appendix must be submitted (under separate cover), along with Archaeological Resource Management Reports for archaeological sites and Tribal Cultural Resources, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D, Historical Resources Report Form, of the City of San Diego's Historical Resources Guidelines may be used when no archaeological resources were identified within the project boundaries.

Step 5

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial-related artifacts, catalog information, and final reports, recovered during public and/or private development projects must be permanently curated with an appropriate institution, one that has the proper facilities and staffing for ensuring research access to the collections consistent with state and federal standards unless otherwise determined during the Tribal consultation process. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [California Health and Safety Code, Sections 8010–8011]) and federal (i.e., federal Native American Graves Protection and Repatriation Act [USC 3001–3013]) law and must be treated in a dignified and culturally appropriate manner with respect for the deceased individuals and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When Tribal Cultural Resources are present, or non-burial-related artifacts associated with Tribal Cultural Resources are suspected to be recovered, the treatment and disposition of such resources shall be determined during the Tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, the Code of Federal Regulations, Title 36, Part 79. Additional information regarding curation is provided in Section II of the City of San Diego's Historical Resources Guidelines.

5.6.6 Significance of Impacts After Mitigation

5.6.6.1 Historic Buildings, Structures, Objects, or Sites

Even after application of the existing regulatory framework contained in the Historical Resources Guidelines and Historical Resources regulations, the degree of future impacts and the applicability, feasibility, and success of future avoidance measures cannot be adequately known for each specific future project at this program level of analysis. Thus, potential impacts to historic buildings, structures, objects, and/or sites would be significant and unavoidable.

5.6.6.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Subsequent activities implemented in accordance with the project would potentially result in ground-disturbing activities within the culturally sensitive areas depicted on Figure 5.6-1 and therefore would be required to implement Mitigation Measure **MM HIST 5.6-1**, which would avoid or minimize impacts to archaeological resources. This mitigation measure, combined with the policies of the City's General Plan promoting the identification, protection, and preservation of archaeological resources in addition to compliance with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which require review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impacts related to prehistoric or historic archaeological resources. However, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

5.6.6.3 Tribal Cultural Resources

Subsequent activities implemented in accordance with the project would potentially result in impacts to significant TCRs and therefore would be required to implement Mitigation Measure **MM HIST 5.6-1**, which would minimize impacts to TCRs. This mitigation, combined with the policies of the General Plan promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which requires review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to TCRs. However, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to TCRs would remain significant and unavoidable.

Source: California Geological survey 2008; SanGIS Imagery 2019.

N

0 500 1,000

Feet

Figure 5.6-1

Sensitivity Map

De Anza Natural Amendment to the Mission Bay Park Master Plan

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5.7 Hydrology and Water Quality

This section analyzes potential impacts related to hydrology and water quality that could result from the implementation of the De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021a) and MBPMP Environmental Impact Report (City of San Diego 1994), the Hydrology and Water Quality Technical Memorandum prepared by Harris & Associates (2023) (Appendix I) for the project, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

5.7.1 Existing Conditions

Refer to Chapter 2.0, Environmental Setting, for a discussion of existing conditions related to hydrology and water quality (Section 2.3.7, Hydrology and Water Quality) and Chapter 4.0, Regulatory Framework (Section 4.7, Hydrology and Water Quality), for a discussion of relevant plans, policies, and ordinances related to hydrology and water quality. The project area is in the Peñasquitos Hydrologic Unit extending from the City of Poway on the east to the community of La Jolla on the west (RWQCB 2021). The Peñasquitos Hydrologic Unit contains two coastal lagoons: Sorrento Lagoon and Mission Bay. Several portions within Mission Bay and its shorelines are listed on the 2020–2022 California Integrated Report for impairments (Clean Water Act, Section 303[d] List/305[b] Report) (SWRCB 2022).

5.7.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to hydrology are based on applicable criteria in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and the City's Significance Determination Thresholds (City of San Diego 2022). A significant impact would occur if implementation of the project would:

1. Result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff;
2. Result in a substantial increase in pollutant discharges to receiving waters and/or substantial increases in discharges of identified pollutants to an already impaired water body; or
3. Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge.

5.7.3 Impact Analysis

5.7.3.1 Issue 1: Flooding and Drainage Patterns

Would the proposed project result in flooding due to an increase in impervious surfaces or changes in absorption rates, drainage patterns, or the rate of surface runoff?

a. Flooding

As shown on Figure 2-5, Flood Zones, 130.5 acres within the project area are located on areas that are currently susceptible to 500-year floods and referred to as Moderate Flood Hazard Areas (FEMA 2019). These areas are principally on the De Anza peninsula and in the areas currently occupied by a golf course, tennis courts, and athletic fields. Additionally, 287.8 acres are on land susceptible to 100-year floods, mostly along the coastlines, the banks of Rose Creek inlet, the low-lying Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP), and open water areas of Mission Bay.

The project would enhance and create additional wetlands on the project area, which could alter the existing floodplains. These restoration activities have the potential to affect regional flooding through changes in ground elevations and flow paths. Sea level rise projections should also be taken into consideration when analyzing future flooding in this area.

The latest state guidance for sea level rise from the Ocean Protection Council recommends taking a multi-step approach to consider factors such as local sea level rise projection, type of project, project lifespan, and level of risk associated with the project type. Based on the nearest tide gauges to the project and project lifespan, a range of sea level rise projections can be determined. From this, the potential impacts to the project can be assessed for various scenarios and risk tolerance determined. In general, risk tolerance may be greater for projects with a shorter lifespan, high adaptive capacity, or minimal consequences. Based on the best available science, the low-risk aversion projections for San Diego are 3.6 feet by the year 2100, and the medium-high risk projections are 7 feet by the year 2100. Although year 2100 is beyond a typical project lifespan, due to uncertainty in predicting future sea level rise, both in modeling and greenhouse gas emissions trends, year 2100 is considered in this analysis as the worst-case scenario. Consideration of a range of sea level rise enables various outcomes to be considered (CNRA 2018). For this project, both the low-risk and medium-high risk projections are considered. The extreme risk aversion scenario has no associated probabilistic projection associated with it and is more appropriate to consider for projects with an extremely low risk tolerance, such as a wastewater treatment plant, so it is not considered for this project. The project is a habitat restoration project with recreational amenities. Future planning efforts can consider phasing of adaptation strategies to account for uncertainty around timing and extent of sea level rise. With implementation of the project, De Anza Cove is expected to experience lowered levels of inundation and velocities by 2100 compared to if the area is left in its current state as a result of proposed wetland restoration activities, which would increase resilience to sea level rise and coastal flooding. Restored wetlands increase resilience by providing an increased opportunity for flood flows to be diverted into the new enhancement areas compared with existing impervious conditions.

In addition, restoration and enhancement of wetlands in this area of Mission Bay would not adversely impact flood levels because restored wetlands are more resilient to coastal flooding (City of San Diego

2021c). Thus, project modification to the existing floodplain would ultimately lead to a reduction in flood stage and velocities in the area.

Impacts associated with flooding and drainage patterns would be less than significant.

b. Drainage Patterns

Project components that lead to increased local flooding typically involve increasing impervious surface area (generating more runoff), exceeding downstream stormwater conveyance capacity, or grading in such a manner that alters the existing floodplain. The project proposes enhancement and restoration within City-owned portions of the existing KFMR/NWP and the expansion of wetlands in areas currently occupied by Campland and the developed area of De Anza Cove occupied by the former mobile home park, thus reducing the overall impervious footprint in the project area by transforming existing developed uses to natural wetland habitat.

The project area is within a highly urbanized area where the majority of stormwater currently flows to drainage inlets along roadways and parking lots. Localized drainage near the shoreline drains directly to Mission Bay. The project area is relatively flat with a slight southern slope toward the bay. The project would replace the existing Campland area with expanded marshland/habitat area, which would include a combination of mudflats, wetlands, and upland habitats, that could alter the existing drainage patterns in the area. However, since specific design of the wetland enhancements is not currently available, no sizing determinations or calculations have been made to evaluate the sufficiency of existing surface water drainage structures to properly convey stormwater runoff.

Future site-specific enhancement activities would be required to comply with the National Pollution Discharge Elimination System and Hydromodification Management Plan requirements as described in the City's Stormwater Standards Manual (City of San Diego 2021b). In addition, the combination and layout of recreation and athletic facilities would be designed during the General Development Plan process and at the time of redevelopment and implementation of project enhancements and would be required to comply with the National Pollution Discharge Elimination System and Hydromodification Management Plan described in the City's Stormwater Standards Manual. Compliance with these requirements would ensure the proper conveyance of stormwater runoff and drainage within the project area. The overall development density of the project area would be reduced compared to the existing baseline condition, and the proposed new development within the project area would not result in an increase in runoff volume that would result in flooding. Therefore, impacts associated with flooding due to an increase in impervious surfaces or a change in absorption rates, drainage patterns, or the rate of surface runoff would be less than significant.

5.7.3.2 Issue 2: Water Quality

Would the proposed project result in a substantial increase in pollutant discharges to receiving waters and/or substantial increases in discharges of identified pollutants to an already impaired water body?

The Clean Water Act, Section 303(d), list of impaired water bodies identifies Mission Bay at the mouth of Rose Creek as impaired for eutrophication and lead from upstream sources, and Mission Bay at De Anza Cove is listed as impaired for enterococcus, fecal coliform, and total coliform. A significant impact

would occur if construction or operation of the project would create new impairments or exacerbate existing impairments within these waterbodies, which would result in a water quality impact.

a. Construction

Construction of the project would require grading and excavation of soils, which would loosen sediment and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff, could wash into and pollute receiving waters. Pollutants generated from the project during its construction period would be temporary and addressed through preparation of a project-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with the City's Stormwater Standards Manual and the City's Grading Ordinance. It would include such construction best management practices (BMPs) as the following:

- Silt fence, fiber rolls, or gravel bag
- Street sweeping and vacuuming
- Sedimentation basin
- Storm drain inlet protection
- Stabilized construction entrance/exit
- Vehicle and equipment maintenance, cleaning, and fueling
- Hydroseeding
- Material washout
- Stockpile management
- Spill prevention and control
- Solid waste management
- Concrete waste management
- Water quality monitoring

Adherence to applicable requirements and implementation of the appropriate BMPs would ensure that pollutant discharge associated with construction activities would be minimized, and impacts would be less than significant.

b. Operation

The project would have the potential to result in long-term operational pollutants associated with components of the project, such as guest accommodations, parking areas, and street improvements that would introduce potential pollutants, including sediments, heavy metals, nutrients, trash and debris, oxygen-demanding substances, oil and grease, pesticides, and bacteria and viruses. Due to the project's location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion. Therefore, operation of the project could increase pollutant discharge to receiving waters and increase discharge of identified pollutants.

However, in accordance with the City's Stormwater Standards Manual (City of San Diego 2021b), the project is a priority development project that is required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control BMPs into the project's design. The types of BMPs that could be implemented are listed in Table 5.7-1, Recommended Best Management Practices. The BMPs in this table are preliminary recommendations and would be refined and implemented as part of final project design and monitoring programs for future project activities consistent with the project in accordance with the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan (SWQMP). The SWQMP must accompany the final design of subsequent project activities to ensure that runoff generated by the project is adequately captured/treated per applicable federal, state, and local regulation.

Water quality design features are proposed along the edges of active recreational areas. Proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality detention basins would be located to treat the entire project area in accordance with local and state requirements.

Water quality detention basins would be designed with a sediment forebay, a height-appropriate embankment specific for each area of treatment, and a base to reduce sediment and erosion at the outflow. Native plants would be used to reduce sediment and total suspended solids from stormwater. Additional water quality-enhancing features would include vegetated areas bordering all development to reduce stormwater contamination, including debris and sediment, from reaching Mission Bay.

Revegetating the edges of Rose Creek and along the "boot" of De Anza Cove with marsh, wetland, and upland native plants would create another water quality-enhancing feature. In addition, "green" infrastructure such as constructed oyster beds would be implemented at shorelines where oyster colonization is feasible. Because oysters feed by filtering algae from the water, they function as a natural filter and improve water overloaded with nutrients.

Table 5.7-1. Recommended Best Management Practices		
Type of BMP	**Design Concept**	**Description Applicable to Project**
Site Design and Source Control Measures	Efficient Irrigation Systems and Landscape Design	Implement rain shutoff devices to prevent irrigation during and after precipitation events in accordance with the City's Landscape Standards (City of San Diego 2016). Reduce irrigation contribution to dry weather runoff by avoiding spray irrigation patterns where overspray to paved surfaces or drain inlets would occur. Design irrigation systems to each landscape area's specific water requirements to avoid overwatering and potential irrigation runoff. Implement flow reducers or shutoff valves triggered by a pressure drop to control water loss in the event of broken sprinkler heads or lines. Avoid locating drain inlets in lawn areas.
	Trash Storage Areas/Pet Waste	Provide covered trash receptacles and routine pickup. Along walkways, include signage requesting pet owners to pick up their pet's waste, and provide pet waste bag dispensers.
	Material Storage Areas	Establish outdoor/indoor areas for suitably storing hazardous and non-hazardous materials. Develop Hazardous Materials Management Plan for any hazardous materials stored in the project area.
	Drain to Permeable Surfaces	Direct surface flows from impermeable surfaces (streets, parking lots, sidewalks) into adjacent permeable areas.
	Stormwater Conveyance System Stamping and Signage	Provide inlets and catch basins with stamp/stencil stating that runoff discharges to the ocean. Post signs and prohibitive legal language to deter illegal dumping.
	Non-Toxic Roofing Materials	Avoid all toxic materials, including the use of galvanized steel or copper for roofs, gutter, and downspouts.
	Employ Integrated Pest Management Principles	Employ integrated pest management focusing on long-term prevention of pests or their damage through a combination of biological control, habitat manipulation, and use of resistant plant varieties. Pesticides shall be used only after monitoring indicates they are needed. Pest control materials shall be selected and applied in a manner that minimizes risks to human health, beneficial and non-target organisms, and surrounding environment. For more information on pesticide application, visit the following website: http://www.ipm.ucdavis.edu/WATER/U/index.html. Use plant pest-resistant or well-adapted plant varieties and discourage pests by modifying the project area and landscaping design to eliminate or reduce the need for pesticide use. Use barriers, screens, and caulking to keep pests out of buildings and landscaping. Use physical pest elimination techniques, such as weeding, washing, or trapping pests.
	Storm Drain Stenciling	Stencil all inlets/catch basins with the words "No Dumping – Drains to Creek," or equivalent message.

Table 5.7-1. Recommended Best Management Practices		
Type of BMP	**Design Concept**	**Description Applicable to Project**
	Additional Considerations	Stabilize the project area, vegetate disturbed soils and slopes with drought-tolerant upland vegetation and wetlands, and stabilize permanent channel crossings. Convey runoff safely away from the top of slopes and install energy dissipaters at the outlets of new storm drains that discharge to unlined channels to reduce potential for erosion and minimize impacts to receiving waters. Construct oyster beds to improve water quality.

Notes: BMP = best management practice

With implementation of water quality design features and BMPs that would be required by the City, potential pollutants would be reduced to the maximum extent feasible, and impacts would be less than significant.

5.7.3.3 Issue 3: Groundwater

Would the proposed project deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?

The project would not use groundwater resources. Water supply for the project would be provided by the City through the Miramar/Murray Reservoirs, which contain adequate surface water supplies to serve the project. No on-site groundwater wells would be installed. Therefore, groundwater resources would not be depleted, and pollutants within the groundwater would not be concentrated due to groundwater extraction. The project would have a less than significant impact on groundwater supplies.

The project area is on low-lying land and estuary formed by the historical meandering of the San Diego River prior to the engineering of its current outlet into the Pacific Ocean in the mid-1800s. The Pacific Beach area, northwest of the project area, and Mission Bay rest on low alluvial deposits where the highest elevation in the project area is 16 feet above mean sea level. Due to these low elevations and the proximity of the project area to the saline waters of Mission Bay, soils under the project are not available for extensive fresh groundwater resources. In addition, groundwater levels in near-ocean alluvial deposits are often influenced more by tidal fluctuation than by freshwater recharge. Therefore, the project would not interfere with groundwater recharge.

The project would increase the amount of permeable surface area compared to the existing baseline condition, thus increasing the rate of infiltration of stormwater. Implementation of construction BMPs would be practiced to clean up any potential contaminant spills in accordance with the construction SWPPP, and any such potential contamination would be unlikely to affect groundwater through infiltration. Upon preparation and implementation of a SWPPP, consistent with regulatory requirements, impacts to groundwater would be less than significant.

5.7.4 Significance of Impacts

5.7.4.1 Flooding and Drainage Patterns

The project would not result in substantial changes to drainage patterns or increase of impervious surfaces. Conversely, the project would reduce the amount of impervious surfaces and create additional wetland habitat, which would reduce the risk of flooding. Therefore, the project would have a less than significant impact on flooding and drainage patterns, and no mitigation is required.

5.7.4.2 Water Quality

Pollutants generated from the project during its construction period would be temporary and be addressed through preparation of a project-specific SWPPP and implementation of construction BMPs. The potential long-term pollutants associated with the project would be addressed through the implementation of project area and source control BMPs as defined in the City's Stormwater Standards Manual. Due to the project's location, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline.

To preserve local hydrology and water quality resources, preliminary BMPs are recommended to address potential impacts, consistent with the City's Stormwater Standards Manual. A SWQMP must accompany the final design of the project to ensure that runoff generated is adequately captured/treated. Upon preparation and implementation of a SWQMP and implementation of BMPs, per regulatory requirements, impacts associated with water quality would be less than significant, and no mitigation is required.

5.7.4.3 Groundwater

The project does not require the use of groundwater supplies. No groundwater wells would be drilled to support the project. Project components would reduce impervious surfaces and would not impede groundwater recharge. Implementation of construction BMPs would be practiced to clean up contaminant spills and would be indicated in the construction SWPPP following completion of the project. Upon preparation and implementation of a SWPPP, per regulatory requirements, impacts to groundwater would be less than significant, and no mitigation is required.

5.7.5 Mitigation Framework

Impacts related to hydrology and water quality would be less than significant; therefore, no mitigation is required.

5.8 Noise

This section analyzes the potential impacts related to noise that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The analysis in this section is based on review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021) and MBPMP Environmental Impact Report (City of San Diego 1994), the Noise Technical Memorandum prepared by Harris & Associates (2023) (Appendix J) for the project, the Transportation Impact Analysis prepared by CR Associates (2023) (Appendix L) for the project, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

5.8.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of the existing noise settings (Section 2.3.8, Noise) and Chapter 4.0, Regulatory Framework (Section 4.8, Noise), for a discussion of relevant plans, policies, and regulations related to noise. In summary, existing noise sources in the project area are primarily dominated by transportation-based noise sources, such as road traffic and aircraft noise. Vehicles traveling on Interstate 5 dominate the existing ambient environment throughout the majority of the project area and are further supplemented by main streets such as Grand Avenue and Pacific Beach Drive. Stationary noise sources include noise from typical recreational/open space areas, such as birds and human conversations. Measured noise levels in the project area ranged from 43.2 A-weighted decibels (dBA) equivalent continuous sound level (time-averaged sound level) (L_{eq}) to 70.6 dBA L_{eq}, with a measured 24-hour noise level of 57.8 dBA community noise equivalent level (CNEL). Refer to Figure 5.8-1, Noise Measurement Locations, which shows where noise measurements were taken in and around the project area.

5.8.2 Significance Determination Thresholds

Thresholds used to evaluate potential noise impacts are based on applicable criteria in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.), the City's Significance Determination Thresholds (City of San Diego 2022), the City's General Plan Noise Element (City of San Diego 2015), and the City's Noise Abatement and Control Ordinance (City's Municipal Code, Section 59.5.0101 et seq.). A significant impact would occur if implementation of the project would:

1. Result in or create a significant increase in the existing ambient noise levels;
2. Result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan;
3. Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP);
4. Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the City's Municipal Code;

5. Result in the exposure of people to significant temporary construction noise; or
6. Result in the exposure of people to significant groundborne vibration.

No local adopted threshold is available for groundborne noise and vibration; however, the Federal Transit Administration and the California Department of Transportation provide relevant guidance for this analysis related to transportation and construction projects. A significant vibration impact would occur where structures or human receivers would be exposed to the respective damage and annoyance thresholds, measured in peak particle velocity (PPV) (inches per second) or vibration decibels (VdB). Continuous vibrations with a PPV of approximately 0.10 inch per second begin to annoy people (Caltrans 2004). The threshold of perception is 70 VdB, and the damage threshold for fragile structures is 0.20 inch per second (FTA 2018).

5.8.3 Impact Analysis

5.8.3.1 Issue 1: Ambient Noise

Would the proposed project result in or create a significant increase in the existing ambient noise levels?

a. Project-Related Traffic Noise

Project-related traffic noise was assessed through comparison of the number of vehicle trips generated by the project relative to the existing baseline condition (Appendix L). Decibels (dB) are measured on a logarithmic scale, which quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as a doubled traffic volume, would increase the noise levels by 3 dBA; halving of the energy would result in a 3 dBA decrease.

The project would generally result in fewer vehicle trips than those generated under the existing baseline condition because the project would reduce the development density in the project area. As shown in Table 5.8-1, Project Weekday Trip Generation, during weekdays, the project would result in approximately 2,133 fewer average daily traffic (ADT) trips compared to the existing baseline condition. During AM and PM peak hours, the project would result in 77 and 196 fewer trips, respectively, than the existing baseline conditions.

Table 5.8-1. Project Weekday Trip Generation											
Site Uses	Daily	AM Peak Hour					PM Peak Hour				
		%	Trips	Split	In	Out	%	Trips	Split	In	Out
Mission Bay RV Resort – Existing	2,816	4%	112	4:6	45	67	9%	255	6:4	153	102
Campland – Existing	4,798	5%	239	4:6	96	143	9%	434	5:5	217	217
Total (Existing)	**7,614**		**351**		**141**	**210**		**689**		**370**	**319**
De Anza Natural (Proposed)	5,481	5%	274	4:6	110	164	9%	493	5:5	247	246
Net (Proposed – Existing)	**−2,133**		**−77**		**−31**	**−46**		**−196**		**−123**	**−73**

Source: Appendix L.

Table 5.8-2, Project Weekend Trip Generation, summarizes the predicted changes in traffic volumes for weekends. As shown in this table, there would be a decrease in the number of project-related trips compared to the number of trips under the existing baseline condition. A net reduction of approximately 2,818 ADT would result, and approximately 292 fewer trips would occur during the weekend midday peak hour.

Table 5.8-2. Project Weekend Trip Generation						
Site Uses	Daily	Midday Peak Hour				
		%	Trips	Split	In	Out
Mission Bay RV Resort – Existing	3,409	10%	341	6:4	204	136
Campland – Existing	4,259	8%	339	6:4	203	136
Total (Existing)	**7,668**		**680**		**407**	**272**
De Anza Natural (Proposed)	4,850	8%	388	6:4	233	155
Net (Proposed – Existing)	**−2,818**		**−292**		**−174**	**−117**

Source: Appendix L.

Implementation of the project would result in a reduction in ADT and peak-hour trips on weekdays and weekends, which would result in a decrease in traffic-related noise compared to the existing baseline conditions. Therefore, the project would not result in or create a significant increase in existing ambient noise levels. Project-related traffic noise impacts would be less than significant.

b. Project-Related Operational Noise

Changes in operational on-site noise were assessed qualitatively by reviewing the project area land uses and locations in relation to existing on-site land uses and adjacent off-site noise-sensitive receivers.

The project would replace the developed Campland on the Bay (Campland) area with expanded wetlands habitat in accordance with the MBPMP recommendation, which designates the Campland area as habitat area. Further, the project would replace the developed Mission Bay RV Resort and vacated De Anza Cove mobile home park with low-cost visitor guest accommodations, allowing camping sites for RVs, cabins, or other eco-friendly accommodations and associated open space and

facilities consistent with camping accommodations. These facilities and amenities would be similar to those that exist currently in the Campland and Mission Bay RV Resort areas. The proposed guest accommodations would be within the "boot" portion of De Anza Cove, farther from existing adjacent noise-sensitive land uses (residences to the north and northwest) than Campland is, and about the same distance as the Mission Bay RV Park is from existing noise-sensitive land uses. Additionally, as shown on Figure 3-1, Site Plan, the total area of developed land would be reduced compared to the existing conditions. The project would remove some of the developed areas within the "boot" and replace them with natural habitat and recreation areas that are similar to those found throughout Mission Bay Park.

Changes are also proposed in the northern portion of the project area. Amenities in the regional parkland areas would be enhanced with new bike paths, and the Mission Bay Boat and Ski Club would be replaced with wetlands and buffers adjacent to the Rose Creek inlet and additional athletic uses and passive park features. Two potential locations are also identified for the potential Interpretive Nature Center. The project would enhance the existing De Anza Cove Park area by adding a non-motorized boat rental facility, restrooms, and picnic shelters to the park area. Removing the existing developed areas of Campland, the vacant De Anza Cove mobile home park, the Mission Bay RV Resort, and the Mission Bay Boat and Ski Club and implementing natural habitat and recreational land uses in the De Anza Cove "boot" area would move on-site noise sources away from nearby noise-sensitive receptors (which are primarily along the northern and western project boundaries). The project would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses. Additionally, the project would comply with the Chapter 5, Article 9.5, Noise Abatement and Control, of the City's Municipal Code. Section 59.5.0401 establishes sound level limits, and Section 59.5.0502 establishes limits to the disturbing, excessive, and offensive noises that the project would comply with. Therefore, the project would not result in or create a significant increase in existing ambient noise levels. Project-related operational noise impacts would be less than significant.

c. Noise Impacts to Sensitive Wildlife

The City's significance thresholds include noise limits in areas that could potentially affect sensitive wildlife (City of San Diego 2022). Demolition of uses, including Campland, the vacant mobile home park, the Mission Bay RV Resort, and the Mission Bay Boat and Ski Club, and installation of expanded wetlands habitat near the Multi-Habitat Planning Area or sensitive species may require mitigation to reduce noise to less than significant levels. Noise impacts to the Multi-Habitat Planning Area and sensitive bird species are discussed in Section 5.3, Biological Resources, and Appendix D, Biological Resources Technical Report. Construction impacts would be less than significant. Following construction, noise from operation of the project area would be similar or reduced compared to existing conditions, as described above, and impacts would be less than significant.

5.8.3.2 Issue 2: Vehicular Noise

Would the proposed project result in an exposure of people to current or future transportation noise levels which exceed guidelines established in the Noise Element of the General Plan?

a. Freeway and Roadway Noise

A project would have the potential to result in a significant transportation noise impact if it would cause a roadway to generate noise levels in excess of the City's applicable General Plan Noise Element noise compatibility standard or an increase in noise level of 3 dBA or more where the standard is already exceeded (City of San Diego 2022). As established in the City's General Plan Noise Element, noise levels up to 65 dBA CNEL are compatible with sensitive receptors. As discussed above, implementation of the project would result in a reduction in ADT and peak-hour trips on weekdays and weekends, which would result in a decrease in traffic-related noise to and from the project area, as well as along the adjacent roadways, compared to the existing baseline conditions. Therefore, the project would not result in an increase in vehicle noise and would not result in the exposure of people to current or future transportation noise levels that exceed standards established in the City's General Plan Noise Element. Noise compatibility impacts associated with operation of the project would be less than significant.

5.8.3.3 Issue 3: Airport Compatibility

Would the proposed project result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?

A significant impact could occur if implementation of the project would result in land uses that are not compatible with aircraft noise levels as defined by an adopted ALUCP. The nearest airports are the San Diego International Airport and the Montgomery-Gibbs Executive Airport, each located approximately 4 miles from the project area. Based on the San Diego International Airport's ALUCP (SDCRAA 2014), the project area is north of the Airport Influence Area and approximately 2.7 miles outside the airport's 65 dBA CNEL noise contour. Based on the Montgomery-Gibbs Executive Airport ALUCP (SDCRAA 2010), the project area is west of the Airport Influence Area and approximately 3.5 miles outside the airport's 65 dBA CNEL noise contour. Although aircraft departures are audible throughout the project area, aircraft noise contributes less than 65 dBA CNEL to the noise environment of the project area. Because noise levels from aircraft would be below 65 dBA CNEL, neither exterior nor interior noise compatibility impacts would occur at any of the proposed land uses. Additionally, the project would not result in an increase in exposure compared to existing conditions or introduce new land uses that would interfere with flight patterns. Therefore, implementation of the project would result in a less than significant impact related to compatibility with aircraft noise levels.

5.8.3.4 Issue 4: Noise Ordinance Compliance

Would the proposed project result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the City's Municipal Code?

The sound level limits from City's Municipal Code, Section 59.5.0401, can be found in Table 4-4, City of San Diego Table of Applicable Noise Limits, in Chapter 4.0. As discussed under Issue 1: Ambient Noise, the project is anticipated to result in a noise reduction at adjacent noise-sensitive land uses due to the

removal of existing noise-generating uses near sensitive receptors (Campland, Mission Bay RV Resort) and the location of new/replacement uses (low-cost visitor guest accommodations) farther from those sensitive receptors. Based on the existing short-term and long-term noise measurements conducted in the project area (see Tables 2-11 and 2-12 in Chapter 2.0), the baseline noise condition at the project area does not exceed the City's noise standards in City's Municipal Code, Section 59.5.0401. Since the project would result in a noise reduction over the existing baseline condition, it would not exceed the City's noise standards either. Proposed future uses consistent with the project would be required to comply with the City's Municipal Code, Section 59.5.0401. Thus, the project would not expose people to noise levels that exceed property line limits established in Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. Impacts would be less than significant.

5.8.3.5 Issue 5: Temporary Construction Noise

Would the proposed project result in the exposure of people to significant temporary construction noise?

a. Construction Noise

Construction of the project would result in temporary localized increases in noise levels from on-site construction equipment, as well as from off-site trucks hauling construction materials from demolition of existing developed areas including Campland, the vacant De Anza Cove mobile home park, the Mission Bay RV Resort, and the Mission Bay Boat and Ski Club.[1] Noise generated by demolition and construction equipment would occur with varying intensities and durations during the various phases of construction. The typical maximum noise levels at a distance of 50 feet for various pieces of demolition and construction equipment are depicted in Table 5.8-3, Construction Equipment Noise Level dBA at 50 Feet. Note that these are maximum noise levels, not an average sound level. The equipment would operate in alternating cycles of full power and low power, thus producing noise levels less than the maximum level. The average sound level of the construction activity also depends on the amount of time that the equipment operates and the intensity of the construction during the time period.

Table 5.8-3. Construction Equipment Noise Level dBA at 50 Feet

Equipment Type	Maximum Noise Level dBA at 50 feet
Backhoe	80
Compactor	82
Concrete Mixer	85
Crane	83
Generator	81
Loader	85
Paver	89
Roller	74
Truck	88
Saw	76

Source: Appendix J.
Notes: dBA = A-weighted decibel

[1] Materials other than soil. No off-site import or export of soil is anticipated because soil import and export would be balanced on site.

For project-related construction noise impacts, the nearest existing noise-sensitive land uses are residences north of Campland, on the northern side of North Mission Bay Drive, at a distance of approximately 105 feet from the nearest project boundary. This is the considered the worst-case assumption for construction noise impacts because the average distance between the nearest and farthest construction activities on the site to the residences is approximately 725 feet. Construction activities would typically take place at distances closer to this average distance, and vibration levels would be substantially reduced compared to those in Table 5.8-3.

The Federal Highway Administration's Roadway Construction Noise Model (RCNM) (FHWA 2008) was used to estimate construction noise levels at typical distances to the nearest noise-sensitive land uses. Input variables for the RCNM consist of the receiver/land use types, the equipment type and number of each (e.g., two excavators, a loader, a dump truck), the duty cycle for each piece of equipment (e.g., percentage of hours the equipment typically works per day), and the distance from the noise-sensitive receiver. Construction noise levels were assessed at two distances for each construction phase: the distance from the nearest noise-sensitive receptors (for the purposes of the construction analysis, these were typically residential land uses) to the closest construction activities, and the more typical distance between the noise-sensitive receptors and the construction activities (the average distance between the near and far work areas). Table 5.8-4, Construction Noise Modeling Summary Results, summarizes the estimated construction noise levels resulting from the project phases.

Table 5.8-4. Construction Noise Modeling Summary Results

Construction Phase	$L_{eq\ 1\text{-}hr}$ (dBA)		$L_{eq\ 12\text{-}hr}$ (dBA)[1]	
	Nearest Receptor (105 feet)	Acoustical Center (725 feet)	Nearest Receptor (105 feet)	Acoustical Center (725 feet)
Demolition	77	62	75	60
Site Preparation	77	61	75	59
Grading	80	65	**78**	63
Building Construction	75	61	73	59
Paving	79	63	**78**	61
Architectural Coating	67	51	65	49

Source: Appendix J.
Notes: dBA = A-weighted decibels; $L_{eq\ 1\text{-}hr}$ = 1-hour A-weighted equivalent sound level; $L_{eq\ 12\text{-}hr}$ = 12-hour A-weighted equivalent sound level; bolded numbers signify that the City's construction noise standard of 75 dBA $L_{eq\ 12\text{-}hr}$ would be exceeded.

[1] 12-hour average noise levels were derived by averaging the hours of anticipated activity hours over a 12-hour period in the logarithmic domain. For example, the grading phase, in which a typical 8 hours of work would occur, would produce an hourly noise level when work is in progress of up to approximately 80 dBA L_{eq}, but when averaged over a 12-hour day in which there would be 8 hours of "on" time and 4 hours of "off" time, the average noise level is approximately 78 dBA L_{eq} (12-hour). It was assumed that all construction phases would similarly take place during an 8-hour workday.

As shown in Table 5.8-4, worst-case hourly average construction noise levels (when construction would take place adjacent to project boundaries with noise-sensitive receptors) would range from approximately 67 dBA to 80 dBA L_{eq}. More typically, when construction would take place at locations other than the nearest project boundary, hourly construction noise levels would range from approximately 51 to 65 dBA L_{eq}. The corresponding 12-hour average construction noise levels would range from approximately 65 to 78 dBA (when construction would take place adjacent to project boundaries with noise-sensitive receptors). Noise levels would have the potential to exceed 75 dBA up to 150 feet from construction. More typically, when construction would take place at locations other than the nearest project boundary, 12-hour average construction noise levels would range from

approximately 49 to 63 dBA $L_{eq\ 12\text{-}hr}$. During grading and paving activities, the estimated worst-case 12-hour average construction noise levels would exceed the City's construction noise standard of 75 dBA $L_{eq\ 12\text{-}hr}$ established in the City's Municipal Code, Section 59.5.0404, by approximately 3 dBA at the nearest sensitive receptors (residences and the school recreational facilities north of the project area).

As specified in the City's Municipal Code, Section 59.5.0404, construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m. Construction is not allowed on legal holidays with the exception of Columbus Day and Washington's Birthday, or on Sundays, consistent with City's Municipal Code, Section 59.5.0404. The City's Noise Abatement and Control Ordinance allows projects to employ noise attenuation techniques as needed to reduce excessive noise levels so that construction noise would be in compliance with the City's Municipal Code, Section 59.5.0404. Such techniques may include but not be limited to the construction of temporary sound barriers or sound blankets between construction sites and nearby noise-sensitive receptors. Nonetheless, temporary construction noise would result in a potentially significant impact (**Impact 5.8-1**).

Impact 5.8-1 Noise levels from project construction would exceed the City's construction noise standard of 75 dBA during the 12-hour period from 7:00 a.m. to 7:00 p.m. (City's Municipal Code, Section 59.5.0404).

Mitigation Measure **MM NOI 5.8-1** requires implementation of construction noise reduction measures to achieve compliance with the 12-hour average noise level limit of 75 dBA L_{eq} established in City's Municipal Code, Section 59.5.0404. With the implementation of Mitigation Measure **MM NOI 5.8-1**, construction noise impacts would be reduced to a less than significant level.

5.8.3.6 Issue 6: Groundborne Vibration

Would the proposed project result in the exposure of people to significant groundborne vibration?

a. Vibration – Construction

Construction activities can generate varying degrees of ground vibration based on the construction activity and equipment being used and can range from no perceptible effects at the lowest vibration levels to slight structural damage at the highest levels. Groundborne vibration associated with construction activities would occur temporarily during groundbreaking activities, such as demolition.

Groundborne vibration from heavy equipment operations during the course of construction activities under the project was evaluated using the methodology in the Federal Transit Administration Manual (FTA 2018) and compared with relevant vibration impact criteria. Groundborne vibration information related to the use of heavy construction equipment has been collected by the California Department of Transportation. This information indicates that continuous vibrations with a PPV of approximately 0.10 inch per second begin to annoy people (Caltrans 2004).

At a distance of approximately 105 feet from the nearest project boundary to noise-sensitive receptors, the vibration levels from the heavy construction machinery with the greatest vibration impact anticipated for project construction (a large bulldozer) would be 68 VdB, or 0.0103 inch per second. Vibration levels of this magnitude would be below the threshold of perception (70 VdB) and well below the damage threshold for fragile structures (0.20 inch per second). While construction vibration levels

during any phase may be perceptible at times, demolition and construction phases that have the highest potential of producing vibration (such as bulldozers) would be intermittent and would only occur for short periods of time on a given site within the project area. Therefore, vibration levels resulting from demolition and construction equipment would not result in excessive groundborne vibration levels. Construction-generated vibration impacts would be less than significant.

b. Vibration – Operation

On occasion, commercial operations (associated with the proposed boat lease areas) use equipment or processes that have a potential to generate groundborne vibration from operation of heavy machinery such as heavy-duty trucks, cranes, barges, and work boats. However, excessive vibration exposure from commercial machinery is generally addressed from an occupational health and safety perspective. The residual vibrations from operation of heavy machinery are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses. Therefore, due to distance, sensitive receptors would not be likely to feel the effects of groundborne vibration from commercial equipment at the boat lease areas. Additionally, leased commercial uses that may be constructed under the project, such as the non-motorized boat rental areas, would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Recreational and guest accommodation uses do not typically generate vibration. Thus, operational vibration impacts associated with project implementation would be less than significant.

5.8.4 Significance of Impacts

5.8.4.1 Ambient Noise

Operation of the project would result in approximately 2,133 fewer ADT on weekdays and 2,818 fewer ADT on weekends compared to the existing baseline condition and would result in a corresponding reduction in traffic noise compared to the existing condition. Removing the developed areas of Campland, the vacated De Anza Cove mobile home park, the Mission Bay RV Resort, and the Mission Bay Boat and Ski Club and implementing natural habitat and recreational land uses in the De Anza Cove "boot" area would move on-site noise sources away from nearby noise-sensitive receptors primarily located along the northern and western project boundaries. The project would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses. Therefore, project-related impacts to ambient noise would be less than significant.

5.8.4.2 Vehicular Noise

The project would result in an overall reduction in vehicle trips on weekdays and on weekends. Therefore, the project would not result in the exposure of people to current or future transportation noise levels that exceed standards established in the City's General Plan Noise Element. Vehicular noise impacts associated with operation of the project would be less than significant.

5.8.4.3 Airport Compatibility

Based on the airport noise contours for the San Diego International Airport and Montgomery-Gibbs Executive Airport, no portions of the project are forecasted to experience noise levels due to aircraft

operations that exceed 65 dBA CNEL. Therefore, impacts related to aircraft noise levels would be less than significant.

5.8.4.4 Noise Ordinance Compliance

Operation of the project is anticipated to result in a reduction in noise from the project area at adjacent noise-sensitive land uses. Noise sources associated with the proposed uses would be similar to existing uses that currently do not exceed the 1-hour noise level limits in the City's Municipal Code. Further, through continued enforcement of the Noise Abatement and Control Ordinance of the City's Municipal Code, specifically the noise level limits in City's Municipal Code, Section 59.5.0401, project impacts would be less than significant.

5.8.4.5 Temporary Construction Noise

Project grading and paving activities would potentially exceed the City's Noise Abatement and Control Ordinance standard for construction (75 dBA $L_{eq\ 12\text{-}hr}$) in City's Municipal Code, Section 59.5.0404, by approximately 3 dB when these activities take place adjacent to noise-sensitive receptors (residences and the school's recreational facilities north of the project area), resulting in a potentially significant noise impact during construction (Impact 5.8-1).

5.8.4.6 Groundborne Vibration

Vibration levels from anticipated heavy construction machinery would be below the perception threshold and the damage threshold for fragile structures. Therefore, vibration levels resulting from heavy construction equipment would not result in excessive groundborne vibration levels. Project land uses, including the non-motorized boat rental area, guest accommodation, and recreational uses, would not typically generate vibration. Construction and operational vibration impacts associated with the project would be less than significant. No mitigation is required.

5.8.5 Mitigation Framework

To reduce Impact 5.8-1 to below a level of significance, the following mitigation measure shall be implemented as part of the project. Implementation of this mitigation measure would require specific noise best management practices during construction to ensure construction noise would not exceed the City's Noise Abatement and Control Ordinance standard for construction.

MM NOI 5.8-1 Construction Noise Best Management Practices. During construction of future development within the proposed project area, construction contractors for the project shall implement the following measures to minimize short-term noise levels caused by construction activities. Measures to reduce construction noise shall be included in contractor specifications and shall include but not be limited to the following:

A. Properly outfit and maintain construction equipment with manufacturer-recommended noise reduction devices to minimize construction-generated noise.

B. Operate all diesel equipment with closed engine doors and equip the equipment with factory-recommended mufflers.

C. Employ additional noise attenuation techniques, as needed, to reduce excessive noise levels and bring construction noise into compliance with the City of San Diego's Municipal Code, Section 59.5.0404. Such techniques may include but not be limited to the construction of temporary sound barriers or sound blankets between construction sites and nearby noise-sensitive receptors.

D. Notify in writing adjacent noise-sensitive receptors within 2 weeks of any construction activity, such as jackhammering, concrete sawing, asphalt removal, and largescale grading operations, that would occur within 150 feet of the property line of the nearest noise-sensitive receptor. The extent and duration of the construction activity shall be included in the notification.

E. Designate a "disturbance coordinator" who shall be responsible for receiving and responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, shall require that reasonable measures, such as providing sound barriers or sound blankets between construction sites and the receptor location, locating noisy equipment as far from the receptor as possible, and/or reducing the duration of the noise-generating construction activity, be implemented to correct the problem.

5.8.6 Significance of Impacts After Mitigation

Impact 5.8-1, relating to construction noise, would be potentially significant. Mitigation Measure MM NOI 5.8-1 requires implementation of construction noise reduction measures to achieve compliance with the 12-hour average noise level limit of 75 dBA L_{eq} established in the City's Municipal Code, Section 59.5.0404. With the implementation of Mitigation Measure MM NOI 5.8-1, construction noise impacts would be reduced to a less than significant level.

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Source: Dudek 2022.

Figure 5.8-1

Noise Measurement Locations

De Anza Natural Amendment to the Mission Bay Park Master Plan

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5.9 Paleontological Resources

This section analyzes potential impacts related to paleontological resources that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on a review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) (City of San Diego 2021) and MBPMP Environmental Impact Report (City of San Diego 1994), the Paleontological Resources Technical Memorandum prepared by Harris & Associates (2023) (Appendix K) for the project, and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

5.9.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing paleontological resources (Section 2.3.9, Paleontological Resources) and Chapter 4.0, Regulatory Framework (Section 4.9, Paleontological Resources), for a discussion of relevant plans, policies, and regulations related to paleontological resources. In summary, the majority of the project area is underlain by mapped deposits of artificial fill with Bay Point Formation in the western portion of the area (Kennedy 1975; Kennedy and Tan 2008). The San Diego Natural History Museum (SDNHM) documented 72 fossil localities within a 1-mile radius of the project area (Appendix K). Only 33 of these localities were discovered within the Bay Point Formation. The nearest locality was discovered from a wastewater project directly adjacent to the project area along Crown Point Drive and produced marine invertebrate and vertebrate specimens.

5.9.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to paleontological resources are based on applicable criteria in Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and the City's CEQA Significance Determination Thresholds (City of San Diego 2022). A significant impact would occur if implementation of the project would result in development that requires:

- Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
- Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit.

The City's CEQA Significance Determination Thresholds (City of San Diego 2022) include a Paleontological Monitoring Determination Matrix (see Appendix K) that identifies the sensitivity of

formations located throughout the City. The thresholds provide the following additional guidance for determining significance:

- If there are sedimentary rocks such as those found in the coastal areas, they usually contain fossils.
- If there are granitic or volcanic rocks such as those found in the inland areas, they usually will not contain fossils.

5.9.3 Impact Analysis

5.9.3.1 Issue 1: Paleontological Resources

Would the proposed project result in development that requires over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?

Would the proposed project result in development that requires over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

As described in Section 2.3.9, the majority of the project area is underlain by mapped deposits of artificial fill (Kennedy 1975; Kennedy and Tan 2008). Impacts to paleontological resources were previously analyzed at a program-level in the MBPMP Environmental Impact Report (City of San Diego 1994), which concluded that impacts were not expected to occur because the filling and dredging associated with the development of the area since the 1940s would have already disturbed any paleontological resources (City of San Diego 1994). However, based on the records search results obtained from the SDNHM, the Pleistocene, or "Ice Age," Bay Point Formation underlies the western portion of the project area along Crown Point Drive and is known to produce scientifically significant paleontological resources throughout the County and within the project area (refer to Figure 5.9-1, Project Area Geologic Formations) (Appendix K). The Bay Point Formation has a high paleontological resource sensitivity according to the City's CEQA Significance Determination Thresholds (City of San Diego 2022). Artificial fill has no paleontological sensitivity due to the human-made nature of these deposits (Appendix K). Any fossil material found in artificial fill would not be considered scientifically significant or unique.

Grading related to construction of the project would be balanced within the project area with approximately 873,886 cubic yards of overall cut and fill. Some cut material would be moved during the demolition of Campland and used as fill for the De Anza Cove area. The buildout of the De Anza Cove area would involve the conversion of the existing Campland property to natural habitat area, including uplands and wetlands, which would require backfilling portions of the bay located south of the proposed marsh and southwest of the proposed guest accommodation area. It would also include construction of pedestrian and bicycle facilities, construction of new guest accommodations, and other Mission Bay Park enhancements, including a potential Interpretive Nature Center. Construction of the guest accommodations would require demolition and removal of the vacated mobile home park and construction of RV sites and other campsites on approximately 48.5 acres, along with landscaping, restrooms, and showers. The Mission Bay RV Resort would also be cleared for the construction of new guest accommodations. Mission Bay Park enhancements would include multiple components, such as beach enhancements, boat rental docks, new recreation spaces, mounded,

naturalistic landforms, parking lots, and water quality basins and vegetated swales. Construction of the boat rental docks would involve minimal grading.

Although the project would involve grading, proposed excavation would primarily occur in the Campland area and the east–west trending peninsula comprising De Anza Cove, which are areas underlain by artificial fill. Although enhancements and restoration would occur, excavation is not proposed in areas in the western portion of the project area where the Bay Point Formation is mapped on the surface adjacent to the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve. Some enhancement activities, such as the removal of invasive species using hand tools, may be conducted in the western portion of the project area. The SDNHM records search identified one Pleistocene fossil locality (SDNHM 3326) on the De Anza Cove peninsula, which was likely collected from Bay Point Formation sediments prior to artificial fill placement. This indicates that Bay Point Formation sediments may still be present in areas underlain by artificial fill and that excavations in this area could potentially impact Bay Point Formation fossils.

The proposed project's impacts would be potentially significant because the project would trigger the threshold for significance (i.e., earthwork greater than 1,000 cubic yards in quantity within a high sensitivity paleontological geological unit or earthwork greater than 2,000 cubic yards in quantity within a moderate sensitivity paleontological geological unit). However, the City's Municipal Code, Section 142.0151, General Grading Guidelines for Paleontological Resources, requires all future development to screen for grading quantities and geologic formation sensitivity and apply the appropriate requirements for paleontological monitoring. The General Grading Guidelines for Paleontological Resources contain standard monitoring requirements to be placed on grading plans and implemented according to the criteria above related to the depth of excavation and sensitivity of the formation. It includes requirements to verify records searches, attend pre-construction meetings, identify monitoring areas, and implement proper procedures for fossil recovery. Refer to Appendix K of this Program Environmental Impact Report for a detailed discussion of the General Grading Guidelines for Paleontological Resources requirements. The project would be required to implement these measures during excavation in high sensitivity paleontological formations, primarily in the De Anza Cove peninsula area. Therefore, compliance with the requirements of the City's Municipal Code, Section 142.0151, would ensure that impacts would be less than significant.

5.9.4 Significance of Impacts

Areas of the project are underlain by the Bay Point Formation, which is assigned a high paleontological resource sensitivity. Grading activities associated with future implementation of the project, specifically within the De Anza Cove peninsula, could result in earthwork greater than 1,000 cubic yards in quantity, extending to a depth of 10 feet or greater into high sensitivity formations, or grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site. However, future development within the project area would be required to comply with the grading requirements in the City's Municipal Code, Section 142.0151, which would ensure that impacts would be less than significant.

5.9.5 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

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Source: California Geological survey 2008; SanGIS Imagery 2019.

N

0 500 1,000

Feet

Figure 5.9-1

Project Area Geologic Formations

De Anza Natural Amendment to the Mission Bay Park Master Plan

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5.10 Transportation and Circulation

This section analyzes potential impacts related to transportation and circulation that could result from the implementation of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). The information in this section is based on a review of available plans and technical information, including the City of San Diego's (City's) Mission Bay Park Master Plan (MBPMP) Environmental Impact Report (City of San Diego 1994), the Transportation Impact Analysis prepared by CR Associates (2023) (Appendix L) for the project, the City's Transportation Study Manual (City of San Diego 2020), and the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022).

5.10.1 Existing Conditions

Please refer to Chapter 2.0, Environmental Setting, for a discussion of existing conditions related to transportation and circulation (Section 2.3.10, Transportation and Circulation) and Chapter 4.0, Regulatory Framework (Section 4.10, Transportation and Circulation), for a discussion of relevant plans, policies, and regulations related to transportation. In summary, five regionally and locally significant roadways traverse or provide access to the project area. Transit service in the vicinity of Mission Bay Park is operated by the Metropolitan Transit System (MTS) and currently consists of bus service and light-rail trolley service.

5.10.2 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to transportation and circulation are based on applicable criteria in the Appendix G of the CEQA Guidelines and the City's CEQA Significance Determination Thresholds (City of San Diego 2022). A significant impact would occur if implementation of the project would:

1. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities;
2. Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual;
3. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
4. Result in inadequate emergency access.

5.10.3 Impact Analysis

5.10.3.1 Issue 1: Conflict with Adopted Transportation Program, Plan, Ordinance, or Policy

Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?

This issue focuses on whether the project would conflict with an adopted program, plan, ordinance, or policy related to the transportation system. For the purposes of this analysis, a significant transportation impact could occur if the project would conflict with adopted transportation programs, plans, ordinances, or policies.

The City's General Plan Mobility Element, the City's Complete Communities Program, the San Diego Association of Governments' San Diego Forward: The Regional Plan (2021 Regional Plan), and the City's Bicycle Master Plan provide relevant goals and objectives related to mobility. These documents were used as a starting point to formulate the goals and policies for the project. Policies incorporated as part of the project would support improvements to pedestrian, bicycle, transit, and roadway facilities. Therefore, the project would be consistent with these adopted programs, plans, ordinances, and policies, as discussed below.

a. City of San Diego Mobility Element

The City's General Plan Mobility Element provides policies to improve mobility while attaining a balanced, multimodal transportation network where each mode, or type of transportation, is able to contribute to an efficient network of services meeting varied user needs. The project and its proposed components would support the City's General Plan Mobility Element goals, which call for walkable communities, a transit-first street and freeway system, Transportation Demand Management, and bicycling.

The project would further confirm to the City's General Plan Mobility Element goal to provide vehicle congestion relief. The project would result in a net decrease in traffic compared to existing conditions. The project's average daily trip generation rate and peak-hour splits were obtained from the existing conditions trip generation analysis in Chapter 2.0. As part of the project, more on-site amenities would be provided for the proposed low-cost visitor guest accommodations; therefore, it was conservative to use the trip rates derived from Campland on the Bay (Campland) to forecast the trips associated with the new campsites in the low-cost visitor guest accommodation area, considering that the additional amenities would reduce the need for overnight visitors to make trips outside the low-cost visitor guest accommodation area. In addition, redeveloping De Anza Cove would include upgrades to the existing athletic uses (i.e., Pacific Beach Tennis Center, Athletic Fields, and Golf Course), regional parkland, and beach areas. Since these are existing uses, their associated trips were already captured in the existing traffic counts. It is assumed that the project's enhancements to these uses would accommodate existing users and not generate new trips; therefore, no additional trip generation for these uses was projected. New on-site boat launch, rental areas, and Interpretive Nature Center are ancillary uses that would serve current and future site campers and beach users. No additional trip generation has been assumed for these supporting facilities.

With the removal of the existing campsites at Mission Bay RV Resort and Campland, their associated trips were applied as a reduction in the trip generation calculations. Providing credit for an existing use on site is a common practice in the traffic engineering field and is often applied in traffic studies (Appendix L). A primary reason for including existing development as a credit is because traffic from the existing use is included in the traffic counts. Additionally, the existing campsite trip rates were respectively applied in the "existing uses to be removed" trip generation for Mission Bay RV Resort and Campland. Because the project's land use characteristics would be similar to the existing land use, it is anticipated that the project would attract the same type of users as the existing land uses (RV camping, tent camping, and other passive supporting land uses). The distance traveled by these users is likely to be similar. Finally, to take a conservative approach, no non-motorized trip reduction was assumed despite the active transportation amenities provided in and around the project area.

Table 5.10-1, Weekday Trips Generation – Project, and Table 5.10-2, Weekend Trips Generation – Project, display the project trip generation for the weekday and weekend, respectively.

Table 5.10-1. Weekday Trips Generation – Project

Site	Daily	AM Peak Hour					PM Peak Hour				
		%	Trips	Split	In	Out	%	Trips	Split	In	Out
Mission Bay RV Resort – Existing	2,816	4%	112	4:6	45	67	9%	255	6:4	153	102
Campland – Existing	4,798	5%	239	4:6	96	143	9%	434	5:5	217	217
Total (Existing)	**7,614**	**—**	**351**	**—**	**141**	**210**	**—**	**689**	**—**	**370**	**319**
De Anza Natural (Proposed)	5,481	5%	274	4:6	110	164	9%	493	5:5	247	246
Net (Proposed – Existing)	**−2,134**	**—**	**−77**	**—**	**−31**	**−46**	**—**	**−196**	**—**	**−123**	**−73**

Source: Appendix L.

Table 5.10-2. Weekend Trips Generation – Project

Site	Daily	Midday Peak Hour				
		%	Trips	Split	In	Out
Mission Bay RV Resort – Existing	3,409	10%	341	6:4	204	136
Campland – Existing	4,259	8%	339	6:4	203	136
Total (Existing)	**7,668**	**—**	**680**	**—**	**407**	**272**
De Anza Natural (Proposed)	4,850	8%	388	6:4	233	155
Net (Proposed – Existing)	**−2,818**	**—**	**−292**	**—**	**−174**	**−117**

Source: Appendix L.

As shown above, the project would generate approximately 5,481 average daily trips (2,134 trips less than existing conditions) during the weekday and 4,850 average daily trips (2,818 trips less than existing conditions) during the weekend. These resulting negative net new trips show that the proposed project would generate fewer trips compared to the current baseline condition. Therefore, the project would generally decrease the amount of vehicle traffic on the surrounding roadways and would, thus, improve

most intersection and roadway segment operations within the study area. Locations where proposed project trips would increase the amount of traffic compared to current conditions are concentrated along roadway facilities fronting the key areas of the site's redevelopment.

Furthermore, the project would support and encourage the use of non-vehicular modes as identified in the City's General Plan Circulation Element. Specifically, the multi-use pathways would support Circulation Element Policy M-A.6 to achieve a functional and interconnected pedestrian network and Policy ME-C.1 and Policy ME-E.6 by providing on-site amenities that support alternative modes of transportation and enhance mobility. Class I multi-use path facilities are present in certain areas of De Anza Cove and Mission Bay Park and are supplemented by Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. Circulation in the project area would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities and would support the goals and recommendations included in Section VII (Access and Circulation) of the MBPMP to make biking more comfortable and accessible for people of all ages and abilities by providing better-quality bicycle facilities. In addition, revised language in the proposed amendment calls for improved on-site pedestrian and bicycle facilities, as well as new pedestrian and bicycle facilities that would provide both internal and off-site connections. As a result, the project would enhance safety and opportunity for multimodal travel, including pedestrian and bicyclist connectivity to, from, and throughout the project area, which would increase public access to the Mission Bay water front and provide connections to the surrounding communities and region.

The project would support the City's General Plan Mobility Element transit-first goal of increased ridership. The Mid-Coast Trolley, which consists of the MTS Blue Line Trolley line extension from Downtown San Diego to the University community, is east of the project area. The Balboa Avenue Station, approximately 0.25 mile northeast of the project area, and the Clairemont Drive Station, approximately 0.75 mile southeast of the project area, would provide region-serving high-quality light-rail transit to the project area that would meet Policy ME-B.9.d to locate new public facilities that generate large numbers of person trips, including recreational facilities, in areas with existing or planned transit access. Therefore, the project would be consistent with the goals and policies of the City's General Plan Mobility Element.

b. City of San Diego Complete Communities

The City's Complete Communities Program focuses on four key areas: housing, mobility, parks, and infrastructure. It includes planning strategies that work together to create incentives to build residences near transit, provide more mobility choices, and enhance opportunities for places to walk, bike, relax, and play. The Complete Communities: Mobility Choices (Mobility Choices Program) supports implementation of an enhanced active transportation network in VMT-efficient areas and implementation of VMT reduction measures to encourage and support the use of the active transportation network.

The project would include multi-use pathways for pedestrians and bicyclists that would provide connections to existing public transit facilities. It would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on site to the surrounding community and would enhance opportunities for residents to walk, bike, relax, and play. The improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residents would also serve to reduce

VMT. The project would reduce overall development density in the project area, which would decrease vehicle trips compared to the current baseline condition, and would be consistent with the goals of the Mobility Choices Program.

c. San Diego Association of Governments San Diego Forward: The Regional Plan

The project would include components that support the policy objectives of the 2021 Regional Plan. Revised language in the amendment supports the 2021 Regional Plan vision by calling for improved on-site pedestrian and bicycle facilities and new facilities that would provide both internal and off-site connections with the surrounding community and would make improvements to a currently developed site. The improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residents would serve to reduce VMT. The project would reduce overall development density on site, which would decrease vehicle trips compared to the current baseline condition. The project would not include any components that would conflict with implementation of the 2021 Regional Plan.

Therefore, the project would be consistent with policies, plans, and programs maintaining the City's transportation system, including transit, roadways, and bicycle and pedestrian facilities. Impacts would be less than significant.

d. Bicycle Master Plan

The project would support and encourage the use of non-vehicular modes. Class I multi-use path facilities are present in certain areas of De Anza Cove and Mission Bay Park and are supplemented by Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. Circulation in the project area would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities and would support the goals of the City's Bicycle Master Plan to provide a safe and comprehensive local and regional bicycle network, provide bicycling as a viable choice within the City, and improve connectivity.

5.10.3.2 Issue 2: Vehicle Miles Traveled

Would the project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?

Implementation of the project land uses would be similar to existing land uses, such as low-cost visitor guest accommodations, improvements of the existing land uses (e.g., boat launch ramp, public beaches, and parkland), or complementary land uses (active recreation activities, such as camping club house, Interpretive Nature Center, tennis courts, and boat rental lease).

The City's Transportation Study Manual requires a project to determine if the project would cause an increase in regional VMT. The Transportation Study Manual provides categories where a project is presumed to have a less than significant VMT impact, one of which is applicable to the project. A project is presumed to have a less than significant VMT impact under the following screening criteria (City of San Diego 2020):

1. Redevelopment project that would likely generate less VMT than the existing land use.

As shown in Table 5.10-1 and Table 5.10-2, the project would generate fewer vehicle trips than the existing baseline condition due to reduced development density on site. Because the project's proposed land uses would be similar to existing land uses, but the overall development density would be lower, the project is anticipated to generate fewer VMT.

The proposed land uses are likely to have similar characteristics as the existing land uses (i.e., similar types of campers who drive similar distances); thus, the number of VMT generated by each user or the average distance of each trip is likely to remain the same. Because the project would generate fewer overall trips as shown in Table 5.10-1 and Table 5.10-2 but have the same average trip distance, the total VMT would be fewer than the existing conditions.

To provide a conservative analysis, a market capture study was conducted as described in the Transportation Impact Analysis (Appendix L) to determine the effect of the project on the regional VMT. The number of daily trips was multiplied by average travel distance within the regional service area with and without the project. The "with project" scenario is where the existing land use is redeveloped to provide high-quality amenities and including campsites, similar to existing conditions. The "without project" scenario assumes that the project area is redeveloped but without the camping component. While there are many guest accommodation (RV/camping) facilities in San Diego County, there are limited facilities that provide coastal access. Thus, the analysis conducted as part of the market capture study focused on publicly accessible coastal guest accommodation facilities including South Carlsbad State Beach, San Elijo State Beach, Silver Strand State Beach, Campland (existing Campland and project area), and Tijuana River Valley Regional Park Campground. Figure 5.10-1, Closest Campground with Coastal Access with Project, displays the service area that is reflective of either the areas serviced by the existing Mission Bay Campland or the proposed project, and Figure 5.10-2, Closest Campground with Coastal Access without Project, displays the service area without the project. The figures show the territory that is closest in travel time to each of the region's public coastal campgrounds and approximates each of the destination's market territory if visitors always went to the nearest public coastal campground. As shown on Figure 5.10-2, without the project, the service area of the remaining coastal accessible facilities would expand significantly, which indicates that without the project, the driving distance for residents within the region would increase, resulting in an increase in VMT. Conversely, with the implementation of the project, the service area would be divided more evenly among the facilities, resulting in more localized trips and therefore fewer VMT. Therefore, the project would result in less than significant impacts related to VMT.

5.10.3.3 Issue 3: Hazards Due to Design Feature or Incompatible Use

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

The project does not propose any uses that would result in incompatible roadway use, such as operation of farm equipment or other special equipment. Vehicular access to the project area would be provided from Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation. Design details and the exact placement of any new driveways, circulation design, and construction details of new internal roadways would be designed during the General Development Plan process and at the time of redevelopment and implementation

of project enhancements. Improvements would be constructed in accordance with the standards in the City's Municipal Code, the City's Standard Drawings (Appendix H of the City's Land Development Manual) (City of San Diego 2021), and the City's Street Design Manual (Appendix I of the City's Land Development Manual) (City of San Diego 2017). Therefore, implementation of the project would not result in increased hazards due to a design feature or incompatible uses.

5.10.3.4 Issue 4: Inadequate Emergency Access

Would the project result in inadequate emergency access?

Inadequate emergency access and egress can occur as a result of an incomplete or not fully interconnected roadway network, such as inadequate roadway widths, turning radii, dead-end or gated roads, one-way roads, single ingress and egress routes, or other factors. Vehicular access to the project area would be provided from existing roads, namely Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation, similar to the existing site condition. Design details and the exact placement of any new driveways, circulation design, and construction details of new internal roadways would be designed during the General Development Plan process. Site design of future development would be required to comply with the City's fire apparatus access roadway requirements as outlined in California Fire Code, Section 503, which includes requirements for emergency access. Therefore, the project would not result in inadequate emergency access.

5.10.4 Significance of Impacts

5.10.4.1 Conflict with Adopted Transportation Program, Plan, Ordinance, or Policy

Implementation of the project would not restrict or impede connectivity and would not conflict with any adopted policies or plans addressing pedestrian, bicycle, and transit facilities identified in the City's General Plan Mobility Element, the City's Mobility Choices Program, or the San Diego Association of Governments' 2021 Regional Plan. Therefore, the project's impact on an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities, would be less than significant, and no mitigation is required.

5.10.4.2 Vehicle Miles Traveled

Implementation of the project would not result in VMT exceeding thresholds identified in the City's Transportation Study Manual (City of San Diego 2020). Impacts would be less than significant, and no mitigation is required.

5.10.4.3 Hazards Due to Design Feature or Incompatible Use

The project would include the construction of service roads, vehicular access points, and parking. The project also does not propose any uses that would result in incompatible roadway use. Although specific design details are not known at this time, improvements would be constructed in accordance

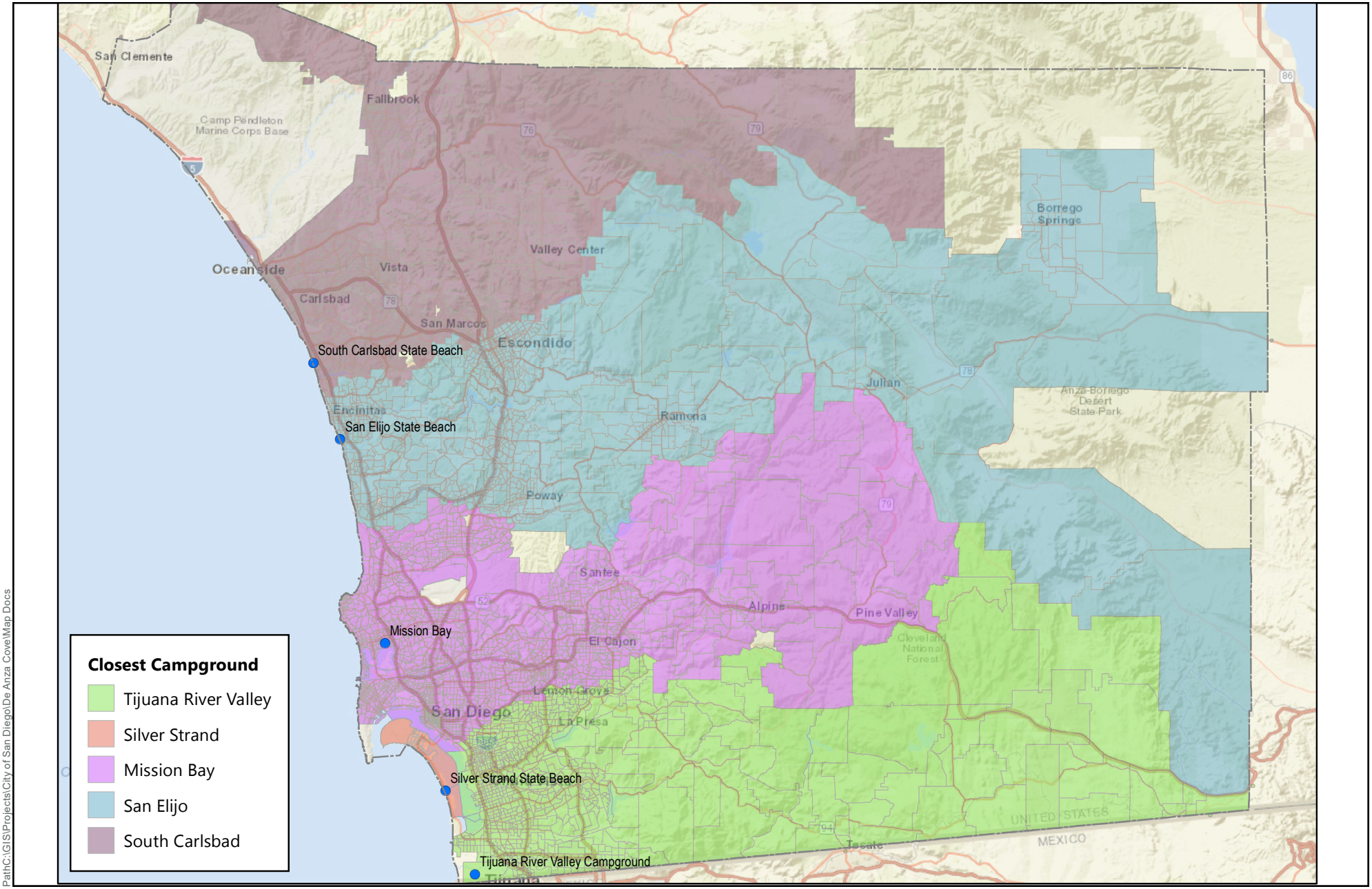
with the standards in the City's Municipal Code, the City's Standard Drawings (City of San Diego 2021), and the City's Street Design Manual (City of San Diego 2017), and implementation of the project would not increase hazards due to a design feature or incompatible uses. Impacts would be less than significant, and no mitigation is required.

5.10.4.4 Inadequate Emergency Access

The project's access improvements would be designed to comply with the requirements for emergency vehicle access, such as the City's fire apparatus access roadway requirements, and would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation is required.

5.10.5 Mitigation Framework

Impacts to transportation and circulation would be less than significant; therefore, no mitigation is required.



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Source: C+R 2022.

Figure 5.10-1

Closest Campground with Coastal Access with Project

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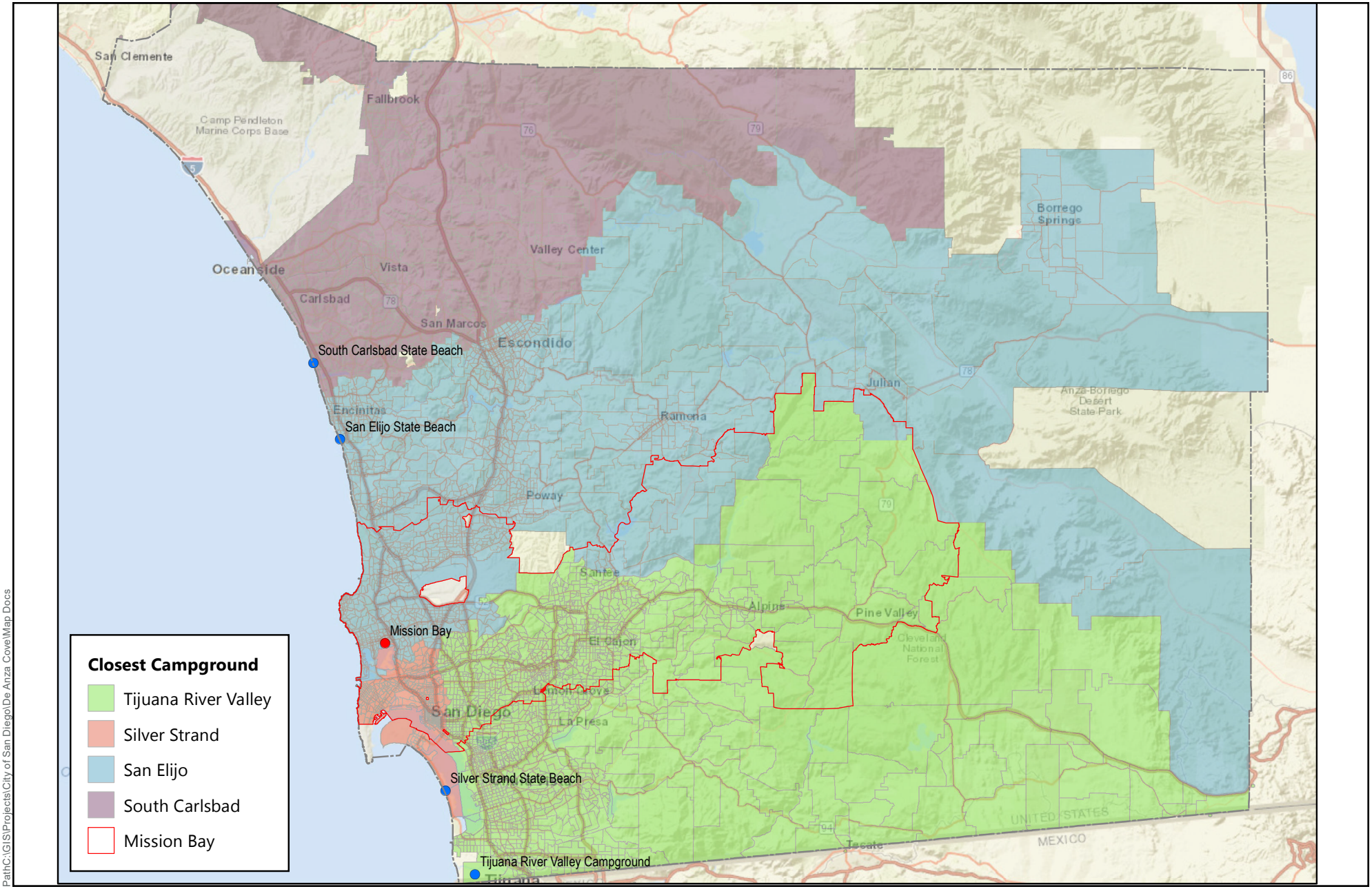

Source: C+R 2022.

Figure 5.10-2

Closest Campground with Coastal Access without Project

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Chapter 6.0
Cumulative Impacts

6.1 Introduction

The California Environmental Quality Act (CEQA) Guidelines, Section 15355, defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." These individual effects may entail changes resulting from a single project or from a number of separate projects. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects occurring over a period of time.

CEQA Guidelines, Section 15130, requires that an Environmental Impact Report (EIR) discuss the cumulative impacts of a project when the project's incremental effect would potentially be cumulatively considerable. Cumulatively considerable, as defined in Section 15065(a)(3), means that the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Where a lead agency determines a project's incremental effects would not be cumulatively considerable, a brief description of the basis for such a conclusion must be included. In addition, the CEQA Guidelines allow for a project's contribution to be rendered less than cumulatively considerable with implementation of appropriate mitigation.

According to Section 15130(b) of the CEQA Guidelines, the discussion of cumulative impacts "need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness." Additionally, one of the following two possible approaches is required for considering cumulative effects:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency; or

- A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated region- or area-wide conditions contributing to the cumulative impact.

Pursuant to CEQA Guidelines, Section 15130(d), cumulative impact discussions may rely on previously approved land use documents such as General Plans, Specific Plans, and Local Coastal Plans, and may be incorporated by reference. In addition, no further cumulative impact analysis is required when a project is consistent with such plans and the lead agency determines that the regional or area-wide cumulative impacts of the project have already been adequately addressed in a certified EIR for that plan.

CEQA Guidelines, Section 15130(e), also states, "If a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact, as provided in Section 15183(j)."

Per CEQA Guidelines, Section 15130(e), the cumulative impacts assessment in this section relies on the cumulative impact determinations in the City of San Diego's (City's) General Plan Program Environmental Impact Report (PEIR), which guides the City's development and has previously identified cumulative issues. The following issues were identified as cumulatively considerable in the General Plan PEIR: agricultural resources, air quality, biological resources, geological conditions, health and safety, historical resources, hydrology, land use, mineral resources, noise, paleontological resources, population and housing, public services and facilities, public utilities, transportation/traffic/circulation/parking, visual effects and neighborhood character, water quality, and greenhouse gases (GHGs). Consistent with CEQA Guidelines, Section 15130(e), where the significance of cumulative impacts was previously identified for the General Plan PEIR, and the proposed project is consistent with that plan, those impacts do not need to be analyzed further. The proposed De Anza Natural Amendment to Mission Bay Park Master Plan (project) would add incremental effects to several of the cumulative impact areas identified above, and the effects associated with the project would be cumulatively significant.

6.2 Assessment of Cumulative Impacts

The geographic scope for the analysis of cumulative impacts depends on the nature of the issue and the project and varies depending on the environmental issue being analyzed. Often, cumulative impacts are not limited by jurisdictional boundaries. The geographic scope for each topic is addressed below.

The analysis of cumulative impacts is presented in the same order of environmental topics as Chapter 5.0, Environmental Analysis, of this PEIR. General Plan assessment of the potential for cumulative impacts is noted, followed by an assessment of whether the project would contribute considerably to a significant cumulative impact for each environmental topic. A summary of the cumulative analysis is provided in Table 6-1, Summary of Cumulative Impacts.

Table 6-1. Summary of Cumulative Impacts			
Environmental Subject	**Impact Category**	**Cumulative Impact**	**Cumulatively Considerable**
Land Use	Conflicts with Applicable Plans	LS	No
	Conversion of Open Space or Farmland	LS	No
	Conflicts with Habitat Conservation Plan	LS	No
	Conflicts with Adopted Airport Land Use Compatibility Plan	LS	No
Air Quality and Odor	Conflict with Air Quality Plan	LS	No
	Air Quality Standards–Construction Emissions	LS	No
	Air Quality Standards–Operation Emissions	LS	No
	Cumulatively Considerable Net Increase of Criteria Pollutants	LS	No
	Substantial Pollutant Concentrations	LS	No
	Odors	LS	No
Biological Resources	Sensitive Species	LSM	No
	Sensitive Habitats	LS	No
	Wetlands	LS	No
	Wildlife Movement	LS	No
	Conservation Planning	LS	No
	Multi-Habitat Planning Area Edge Effects	LS	No
	Local Policies/Ordinances	LS	No
	Invasive Species	LS	No
Greenhouse Gas Emissions	Greenhouse Gas Emissions	LS	No
	Conflicts with Plans or Policies	LS	No
Hazards and Hazardous Materials	Wildfire Fire Risk	LS	No
	Hazardous Emissions and Materials	LS	No
	Emergency Plan Consistency	LS	No
	Hazardous Materials Sites	LSM	No
	Aircraft-Related Hazards	LS	No
Historical, Archaeological, and Tribal Cultural Resources	Historic Structures, Objects, or Sites	SU	Yes
	Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains	SU	Yes
	Tribal Cultural Resources	SU	No

Table 6-1. Summary of Cumulative Impacts			
Environmental Subject	**Impact Category**	**Cumulative Impact**	**Cumulatively Considerable**
Hydrology and Water Quality	Flooding and Drainage Patterns	LS	No
	Water Quality	LS	No
	Groundwater	LS	No
Noise	Ambient Noise	LS	No
	Vehicular Noise	LS	No
	Airport Compatibility	LS	No
	Noise Ordinance Compliance	LS	No
	Temporary Construction Noise	LSM	No
Paleontological Resources	Paleontological Resources	LS	No
Transportation and Circulation	Conflict with Adopted Transportation Program, Plan, Ordinance, or Policy	LS	No
	Vehicle Miles Traveled	LS	No
	Hazards Due to Design Feature or Incompatible Use	LS	No
	Inadequate Emergency Access	LS	No

Notes: LS = Less than Significant; LSM = Less than Significant with Mitigation; SU = Significant and Unavoidable

6.2.1 Land Use

6.2.1.1 Conflicts with Applicable Plans

The geographic context for the analysis of cumulative impacts related to conflicts with applicable plans is Mission Bay Park, covered by the Mission Bay Park Master Plan (MBPMP), and the Pacific Beach Community Planning Area, covered by the Pacific Beach Community Plan.

As discussed in Section 5.1, Land Use, the project would require an amendment to the MBPMP. The goals and recommendations expressed in the proposed MBPMP amendment would be consistent with design guidelines and other mobility and civic guidelines stated in the policies of the City's General Plan. As described in Section 5.1, the project would be consistent with the City's General Plan, the MBPMP, the City's Land Development Code regulations, the San Diego Association of Governments' (SANDAG's) 2021 Regional Plan, the City's Climate Action Plan (CAP), the City's Climate Resilient SD Plan, the California Coastal Act, the Mission Bay Park Natural Resource Management Plan, the Pacific Beach Community Plan and Local Coastal Program Land Use Plan, and the Balboa Avenue Station Area Specific Plan. Future development projects would comply with the applicable regulations and requirements within these planning documents intended to ensure compatibility of land uses. Based on the compatibility of the project with applicable land use plans and regulations, cumulative land use impacts associated with the project would be less than significant, and the project's contribution would not be cumulatively considerable.

6.2.1.2 Conversion of Open Space or Farmland

The entire project area is designated Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008a) and would remain parkland. The project would restore wetland habitat on the existing Campland site, which would result in increased acreage of open space within the project area, consistent with land use designations and goals of the MBPMP. The project would not result in the conversion of open space or farmland to a more intensive land use. Therefore, the project would not result in a cumulative land use impact. The project's contribution would not be cumulatively considerable.

6.2.1.3 Conflicts with the Multiple Species Conservation Program Subarea Plan

As discussed in Section 5.3, Biological Resources, the project's demonstrated consistency with the Multiple Species Conservation Program (MSCP) ensures the project, in combination with other cumulative projects in the City, would not result in cumulatively considerable impacts to biological resources. Therefore, because the project would minimize impacts to biological resources covered by the MSCP and demonstrate consistency with MSCP requirements, the project would not result in a cumulatively considerable impact associated with a conflict with the MSCP Subarea Plan.

6.2.1.4 Conflicts with an Adopted Airport Land Use Consistency Plan

As discussed in Section 5.1, the project is not in the Airport Influence Area (AIA) of either the Montgomery-Gibbs Executive Airport or the San Diego International Airport (SDIA) and, thus, would not be subject to either Airport Land Use Consistency Plan. Future development projects would be required to comply with applicable Airport Land Use Consistency Plans for project approvals to occur and would not be expected to result in a combined significant cumulative impact. Cumulative land use impacts associated with the project would be less than significant, and the project's contribution would not be cumulatively considerable.

6.2.2 Air Quality

In analyzing cumulative impacts from the project, the analysis must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the San Diego Air Basin (SDAB) is designated as non-attainment for the California Ambient Air Quality Standards and National Ambient Air Quality Standards. A project would be considered to have a significant cumulative impact if its contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact). The geographic context for the analysis of cumulative impacts related to air quality is the SDAB. The SDAB has been designated as a federal non-attainment area for ozone (O_3) and a state non-attainment area for O_3, particulate matter less than 10 microns (PM_{10}), and particulate matter less than 2.5 microns ($PM_{2.5}$) emissions associated with construction generally result in near-field impacts. The non-attainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the SDAB. Therefore, a cumulative impact exists related to these pollutants.

6.2.2.1 Conflict with Air Quality Plan

For the SDAB, the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP) serves as the long-term regional air quality planning documents for the purpose of assessing cumulative operational emissions within the basin to ensure the SDAB continues to make progress toward National Ambient Air Quality Standards and California Ambient Air Quality Standards attainment status. As such, cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality if, in combination, they would conflict with or obstruct implementation of the RAQS or SIP. Similarly, individual projects that are inconsistent with the regional planning documents upon which the RAQS and SIP are based would have the potential to result in cumulative impacts if they represent development beyond regional projections.

As discussed in Section 5.2, Air Quality and Odor, the project would not include any growth-inducing features, such as an increase in population or traffic, and would result in a net decrease in vehicle trips compared to existing conditions. Further, the project was envisioned in the growth projections and regional air quality strategies, and the project would not obstruct or impede implementation of local air quality plans. Based on the nature of the project, implementation would not result in development in excess of that anticipated in local plans or increases in population/housing growth beyond those contemplated by SANDAG. As such, vehicle trip generation and planned development for the project is considered to be anticipated in the SIP and RAQS. Because the proposed land uses and associated vehicle trips are anticipated in local air quality plans, the project would be consistent with the underlying growth forecasts in the RAQS. Future development would also be required to demonstrate consistency with the RAQS, SIP, and long-term planning goals of the City, which include ongoing reductions in vehicle trips and associated emissions. Therefore, the project, in combination with other cumulative projects, would not result in a significant cumulative impact related to conflicts with applicable air quality plans. The project's contribution would not be cumulatively considerable.

6.2.2.2 Air Quality Standards

The City has adopted thresholds for determining whether a project would have the potential to result in cumulative emissions of criteria pollutants (City of San Diego 2022). The project's consistency with these thresholds is addressed in Section 5.2. As discussed in this section, the project would not exceed any applicable significance threshold during construction or operation, including thresholds for non-attainment pollutants (volatile organic compounds, oxides of nitrogen [NO_x], PM_{10}, or $PM_{2.5}$). Similar to the project, future projects would be required to demonstrate consistency with goals and policies related to energy efficiency and vehicle use reduction and associated emissions reductions, as well as the City's numeric criteria pollutant thresholds. Cumulative projects would be conditioned to implement mitigation measures during construction or operation if necessary. Therefore, the project, together with other cumulative projects, would not result in a cumulatively considerable contribution to a significant air quality impact with respect to criteria pollutants.

6.2.2.3 Substantial Pollutant Concentrations

As discussed in Section 5.2, there would be an associated reduction in potential for contribution to a carbon monoxide (CO) hotspot from vehicle congestion because vehicle trips would be reduced as a result of project implementation. In addition, toxic air contaminant emissions during construction

would not result in exposure that would exceed the San Diego County Air Pollution Control District significance thresholds. Similar to the project and in compliance with CEQA, other cumulative projects would be required to comply with applicable regulations pertaining to air quality pollutants. Additionally, vehicle and construction emissions standards are increasingly stringent, which reduces the risk of CO hotspots during operation and toxic air contaminant exposure during construction. Development of cumulative projects would occur throughout the City and over multiple years. Development projects would be reviewed separately, and in the event that impacts to sensitive receptors are identified for these projects, mitigation measures would be incorporated into the project to reduce impacts. Therefore, a significant cumulative impact related to substantial pollutant concentrations would not occur. The project's contribution would not be cumulatively considerable.

6.2.2.4 Odors

The geographic scope for the analysis of cumulative impacts relative to objectionable odors is the area immediately surrounding the odor source. Objectionable odors are not cumulative in nature because the air emissions that cause the odors disperse beyond the odor source, making the odor less detectable. As discussed in Section 5.2, operation of project land uses, including natural habitat, guest accommodations, and active recreation, would not generate nuisance odors. As stated previously, cumulative projects in the City would be required to comply with applicable regulations pertaining to objectionable odors, and mitigation measures would be incorporated into cumulative projects as necessary. Therefore, implementation of the project, in combination with other cumulative projects, would not result in a cumulatively considerable contribution associated with objectionable odors.

6.2.3 Biological Resources

6.2.3.1 Sensitive Species

The geographic context for the analysis of cumulative impacts to sensitive plant species is the area covered by the City's MSCP Subarea Plan. A significant cumulative impact would occur if, in combination, cumulative projects would result in a substantial adverse impact on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. All projects, including the proposed project, approved in the City's jurisdiction are required to limit impacts and comply with the biological resources conservation goals of the MSCP and to provide mitigation for impacts to sensitive plant species as appropriate. As analyzed in Section 5.3, potentially significant project-level impacts to sensitive species would be reduced to a less than significant level with implementation of Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6**. Since cumulative projects and the project would be required to meet or exceed the City's MSCP regional conservation requirements and project-specific mitigation measures would be implemented to reduce the project's direct impacts to sensitive plant species to below a level of significance, the project's contribution would not be cumulatively considerable.

6.2.3.2 Sensitive Habitats

The geographic context for the analysis of cumulative impacts to sensitive habitats is the area covered by the City's MSCP Subarea Plan. A significant cumulative impact would occur if, in combination, cumulative projects would have a substantial adverse impact on any sensitive vegetation communities identified in

local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. As discussed in Section 5.3, subsequent projects would result in potentially significant impacts to sensitive habitats that would be reduced to a less than significant level with implementation of Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-5**. The project would provide a net benefit to the vegetation communities in the project area by restoring and expanding natural wetland and aquatic habitats. Therefore, because the project would minimize impacts to sensitive vegetation communities and demonstrates consistency with MSCP requirements, the project would not result in a cumulatively considerable impact to sensitive habitats.

6.2.3.3 Wetlands

The geographic context for the analysis of cumulative impacts to jurisdictional aquatic resources is the area covered by the City's MSCP Subarea Plan. A significant cumulative impact would occur if, in combination, cumulative projects would have a substantial adverse impact on a state or federally protected wetland through direct removal, filling, hydrological interruption, or other means. As discussed in Section 5.3, development of the project would result in potentially significant direct impacts to jurisdictional aquatic resources that would be reduced to a less than significant level with the implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5**. The project would provide a net benefit to the functions and values of the aquatic resources in the project area by restoring and expanding wetland and non-wetland waters. In addition, all cumulative projects with potential impacts to jurisdictional aquatic resources would be required to comply with applicable federal and/or state regulations, such as Section 404 of the federal Clean Water Act, Sections 9 and 10 of the Rivers and Harbors Act, Section 1600 of the California Fish and Game Code, and the Porter-Cologne Water Quality Control Act, to ensure no-net loss of resources. Therefore, because the project would minimize impacts to jurisdictional aquatic resources, has demonstrated consistency with the MSCP requirements, and would comply with federal and state permitting regulations, the project would not result in a cumulatively considerable impact to wetlands.

6.2.3.4 Wildlife Movement

The geographic context for the analysis of cumulative impacts to wildlife corridors and linkages is the area covered by the City's MSCP Subarea Plan. A significant cumulative impact would occur if, in combination, cumulative projects would interfere substantially with the movement of any native resident or migratory fish or animal species or with established native resident or migratory wildlife corridors, or impede the use of native animal nursery sites. As discussed in Section 5.3, the project's demonstrated consistency with the MSCP, MSCP Land Use Adjacency Guidelines, City's Biology Guidelines, and City's Land Development Code Environmentally Sensitive Lands regulations would ensure that the project, in combination with other cumulative projects in the City, would not result in a cumulatively considerable impact to biological resources. The project would provide a long-term benefit for wildlife movement through the project area. Therefore, because the project would minimize impacts to wildlife movement and has demonstrated consistency with MSCP requirements, the project would not result in a cumulatively considerable impact to wildlife corridors and habitat linkages.

6.2.3.5 Conservation Planning

The geographic context for the analysis of cumulative impacts to regional conservation planning is the area covered by the City's MSCP Subarea Plan. A significant cumulative impact would occur if, in combination, cumulative projects would conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. As discussed in Section 5.3, the project has demonstrated consistency with the MSCP. The project, along with cumulative projects, would be required to limit impacts and comply with the biological resources conservation goals of the MSCP and provide mitigation for significant impacts, as appropriate. Consistency with regional conservation plans and mitigation measures, as appropriate, must be demonstrated for the project and other cumulative projects to be approved through a discretionary process. Therefore, because the project would minimize impacts to biological resources covered by the MSCP and has demonstrated consistency with MSCP requirements, it would not result in a cumulatively considerable contribution associated with a conflict with a Habitat Conservation Plan.

6.2.3.6 Multi-Habitat Planning Area Edge Effects

The geographic context for the analysis of cumulative impacts to Multi-Habitat Planning Area edge effects is the area covered by the City's MSCP Subarea Plan. As discussed in Section 5.3, the project's demonstrated consistency with the MSCP Adjacency Guidelines would ensure that the project, in combination with other cumulative projects in the City, would not result in a cumulatively considerable impact to biological resources. Therefore, because the project would minimize impacts to biological resources adjacent to and within the Multi-Habitat Planning Area and has demonstrated consistency with MSCP requirements, it would not result in a cumulatively considerable impact associated with a conflict with the Multi-Habitat Planning Area Adjacency Guidelines.

6.2.3.7 Local Policies/Ordinances

The geographic context for the analysis of cumulative impacts to local policies and ordinances is the City. A significant cumulative impact would occur if, in combination, cumulative projects would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. As discussed in Section 5.3, the project has demonstrated consistency with the City's General Plan. All projects within the City's jurisdiction, including the project, are required to be consistent with the City's General Plan goals and policies and to provide mitigation for conflicts with local policies and ordinances, as appropriate. Therefore, because the project has demonstrated consistency with both MSCP requirements and the City's General Plan and would be consistent with local policies and ordinances protecting biological resources, it would not result in a cumulatively considerable contribution associated with a conflict with local policies and ordinances protecting biological resources.

6.2.3.8 Invasive Species

The geographic context for the analysis of cumulative impacts associated with invasive species is the City. A significant cumulative impact would occur if, in combination, cumulative projects would introduce invasive species of plants into a natural open space area. As discussed in Section 5.3, with

implementation of Mitigation Measure **MM BIO 5.3-5,** the project would have a less than significant impact on introduction of invasive species. Cumulative projects would be required to comply with the City's Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) requiring all plant species installed within 100 feet of the Multi-Habitat Planning Area to be non-invasive and provide mitigation measures to reduce any significant impacts. In addition, the project would provide a net benefit to the biological resources in the project area by removing invasive plant species and restoring temporary impacts using native plant communities, thus minimizing the potential for invasive plant species to be introduced into the project area. Therefore, because the project would minimize impacts from invasive species, it would not result in a cumulatively considerable contribution from invasive species introduction.

6.2.4 Greenhouse Gas Emissions

The geographic scope of consideration for GHG emissions is on a global scale because such emissions contribute to global climate change on a cumulative basis. By nature, GHG evaluations are a cumulative study. Pursuant to CEQA Guidelines, Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG impact may be determined to not be cumulatively considerable if it complies with the requirements of a qualified plan adopted for the purposes of reducing GHG emissions. The City's CAP provides the adopted strategy for reducing cumulative GHG emissions consistent with state goals. Complimentary plans include the City's Climate Resilient SD Plan, SANDAG's 2021 Regional Plan, and California Air Resources Board's (CARB's) 2022 Scoping Plan. These are the applicable plans for determining whether a cumulative contribution to this existing global cumulative impact would occur.

6.2.4.1 Generation of Greenhouse Gas Emissions

As discussed in Section 5.4, Greenhouse Gas Emissions, the project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable because implementation of the project would be consistent with the City's CAP and CAP Consistency Regulations. The project would be consistent with these plans and regulations and, therefore, would not result in a cumulatively considerable contribution to cumulative GHG emissions.

6.2.4.2 Conflicts with Plans or Policies

As discussed in Section 5.4, the project would be consistent with the City's General Plan, CAP, and Climate Resilient SD Plan and would not conflict with or prevent implementation of SANDAG's 2021 Regional Plan or CARB's 2022 Scoping Plan. Cumulative projects would also be required to demonstrate consistency with these plans. Because the project would support implementation of applicable GHG plans and policies, it would not result in a cumulatively considerable contribution to a cumulative conflict with GHG reduction plans.

6.2.5 Hazards and Hazardous Materials

6.2.5.1 Wildland Fire Risk

The geographic context for cumulative impacts related to wildland fire risk is the City. As discussed in Section 5.5, Hazards and Hazardous Materials, while portions of the City are located within a Very High Fire Severity Zone, the project area is not. The project is also located adjacent to high-density commercial and residential uses and the marine waters of Mission Bay, which do not contain wildland fuel sources likely to burn in the event of a wildfire. This reduces the risk of wildfires impacting the project area. Cumulative projects would be required to comply with applicable state and City standards associated with fire hazards and prevention including the City's Brush Management regulations and the City's Fire Code requirements. Therefore, a significant cumulative impact would not occur, and the project's contribution would not be cumulatively considerable.

6.2.5.2 Hazardous Emissions and Materials

The geographical context for the analysis of cumulative impacts related to hazards to schools would be projects located within 0.25 mile of the existing nearby schools. As discussed in Section 5.5, Mission Bay Senior High School is immediately north and west of the project area. Equipment used during project grading and construction could result in incidental spills of petroleum products and hazardous substances. Such spills would be contained on site in accordance with a Stormwater Pollution Prevention Plan (see Section 5.7, Hydrology and Water Quality). The project would not introduce any land uses, such as industrial, that could result in hazardous emissions or the exposure of schools to hazardous materials.

Cumulative projects would be required to comply with state and local regulations including the California Code of Regulations, Title 22, Division 4.5, California Health and Safety Code, and the County of San Diego (County) Department of Environmental Health that provide a high level of protection from new hazardous uses that may be sited near schools or other sensitive receptors. Any potentially significant impacts would be reduced to a less than significant level through compliance with applicable regulations. Similarly, potential hazards associated with hazardous materials emissions are site specific and would not combine with hazards in other areas to create a cumulative impact.

Therefore, implementation of the project, in combination with other cumulative projects, would not result in a significant cumulative impact associated with the handling of or emissions from hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The project's contribution would not be cumulatively considerable.

6.2.5.3 Emergency Plan Consistency

The geographic context for the analysis of cumulative impacts relative to emergency plan consistency is the City. As discussed in Section 5.5, the project's design would be consistent with requirements for emergency vehicle access, and no project components would impair the implementation of or compliance with an adopted Emergency Response or Evacuation Plan.

Cumulative projects would have the potential to impair existing emergency response and evacuation plans if they would block evacuation or access roads or if road improvements would result in the

closure of roads. Construction and operation associated with future development in the City could result in activities that could interfere with adopted emergency response or evacuation plans, such as temporary construction barricades or other obstructions that could impede emergency access. Cumulative projects would be required to comply with the requirements of the San Diego Fire Department and City Traffic Control Requirements. Compliance with applicable regulations would ensure that cumulative projects would not result in a significant impact associated with the impairment of an emergency response and evacuation plan. Therefore, implementation of the project, in combination with other cumulative projects, would not result in a significant cumulative impact associated with emergency response and evacuation plans. The project's contribution would not be cumulatively considerable.

6.2.5.4 Hazardous Materials Sites

The geographic context for the analysis of cumulative impacts relative to hazardous materials sites is site specific. As discussed in Section 5.5, construction of the project could encounter contaminated soil during grading and excavation, which could result in adverse health and safety impacts to on-site construction personnel, as well as cross-contamination in the event that contaminated soil is placed as fill in currently uncontaminated areas. Construction impacts would be reduced to below a level of significance with implementation of Mitigation Measures **MM HAZ 5.5-1** through **MM HAZ 5.5-4**. Mitigation Measure **MM HAZ 5.5-1** requires that all on-site electrical transformers be tested for the presence of polychlorinated biphenyls, and if detected, transformers shall be removed and disposed of properly. Mitigation Measure **MM HAZ 5.5-2** requires soil sampling in areas of documented soil staining and contaminated soil, including in the vicinity of the former De Anza Cove mobile home park Boneyard, former Campland underground storage tanks, Mission Bay Golf Course hydraulic lift, and electrical transformers, to determine whether contamination is present. In the event that elevated concentrations of contaminants (e.g., petroleum compounds, metals, hazardous waste) are present in on-site soils, contaminated soil shall be removed and disposed of in accordance with requirements of the San Diego County Department of Environmental Health Hazardous Materials Division. Mitigation Measure **MM HAZ 5.5-3** requires the preparation of a Hazardous Material Contingency Plan prior to the start of project construction/demolition to specify procedures for the management of potentially impacted soil (and groundwater, if encountered). Mitigation Measure **MM HAZ 5.5-4** requires that any chemicals and potentially hazardous debris in the project area as a result of prior site use and/or project construction be properly characterized and disposed of in accordance with applicable local, state, and federal guidelines and regulations.

Similarly, other cumulative projects would have to comply with regulations directing clean up and rehabilitation of hazardous materials sites to obtain project approvals. Due to the site-specific nature of hazardous materials impacts, a significant cumulative impact would not occur. Therefore, the project's impact would not be cumulatively considerable.

6.2.5.5 Aircraft-Related Hazards

The geographic context for the analysis of cumulative impacts related to aircraft hazards would be those projects in the Montgomery-Gibbs Executive Airport and the SDIA AIAs. In addition, as discussed in Section 5.5, the project area is not in a designated AIA. Project components would not result in a safety hazard for people residing or working in a designated AIA. Potential risks associated with

development in the AIAs would be a factor in any decision to approve or deny future development proposals. Land uses that may be impacted by the airports are reviewed and regulated through the Airport Land Use Compatibility Plan and the City. As a result, cumulative risks to future development associated with proximity to the Montgomery-Gibbs Executive Airport and SDIA would not result in a significant impact.

Therefore, the project, combined with other cumulative projects, would not result in a significant cumulative impact, and the project's contribution would not be cumulatively considerable.

6.2.6 Historical, Archaeological, and Tribal Cultural Resources

6.2.6.1 Historic Structures, Objects, or Sites

The geographic context for the analysis of cumulative impacts relative to historic structures, objects, or sites is defined as the County due to the cultural richness and significance of historical resources in this area. The General Plan PEIR (City of San Diego 2008b) states that the continued pressure to develop or redevelop areas in the region would result in incremental impacts to the historical record in the San Diego region, which was determined to be a cumulatively significant impact. Regardless of the efforts taken to avoid impacts to historical resources, the more land that is converted to developed uses, the greater the potential for impacts to cultural resources. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable and, therefore, could result in a significant cumulative impact.

As outlined in Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, given the presence of potential historical resources within the project area, future development pursuant to the project could have a significant impact on important historic resources. Future development would be required to comply with Section 143.0212 and would be reviewed for conformance with the goals and policies relating to the identification and preservation of historical resources in the Historic Preservation Element of the City's General Plan.

Cumulative impacts to historical resources would involve projects affecting local resources with the same level or type of designation or evaluation, projects affecting other structures located within the same historic district, or projects that involve resources that are significant within the same context as resources associated with the project and could result in a significant impact. Cumulative projects would have to comply with Section 143.0212. Therefore, implementation of the project, in combination with other cumulative projects, would not result in a significant cumulative impact associated with historical resources. The project's contribution would not be cumulatively considerable.

6.2.6.2 Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

The geographic context for the analysis of cumulative impacts relative to prehistoric and historic archaeological resources, sacred sites, and human remains is considered to be the County. Evidence

of human occupation in the project area is represented by numerous archaeological sites throughout the City and overall region.

As discussed in Section 5.6, the records search resulted in the identification of two archaeological resources within the project area of potential effects, P-37-005017 and P-37-011571, both of which are of high interest to the local Native American Kumeyaay community.

Archival review of P-37-005017, though containing rich prehistoric habitation midden deposits, suggests that the concentration of the site is located north of the project. P-37-011571 consists of a widely dispersed prehistoric lithic and shell scatter encompassing Crown Point. This large resource boundary intersects the westernmost extent of the KFMR/NWP portion of the project area. Development of the project would result in ground disturbance activities located near culturally sensitive areas, such as the westernmost portion of KFMR/NWP and northeastern portion of the golf course area, and would be required to implement Mitigation Measure **MM HIST 5.6-1** by requiring the determination of (1) the presence of archaeological or Tribal Cultural Resources (TCRs) and (2) the appropriate level of analysis or mitigation for any significant resources which that may be impacted by a development activity.

In addition, human remains, particularly those interred outside formal cemeteries, could be disturbed during grading, excavation, or other ground-disturbing activities associated implementation of the project. While there are existing federal, state, and local regulations, including the policies of the City's General Plan that would provide for the regulation and protection of prehistoric and historic archaeological resources and human remains to avoid potential impacts, it is not possible to ensure the successful preservation of all prehistoric and historic archaeological resources. Therefore, implementation of the project could adversely impact prehistoric or historic archaeological resources, including religious or sacred use sites and human remains. Implementation of Mitigation Measure **MM HIST 5.6-1** would require procedures for addressing unanticipated discoveries during construction-related activities. However, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis, and impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable.

Due to the scarcity of prehistoric and historic archaeological resources, sacred sites, and human remains and the potential for construction activities associated with future projects to impact these resources, a significant cumulative impact would occur. Although cumulative projects would implement similar mitigation measures to reduce impacts, the feasibility and efficacy of these measures to adequately protect significant prehistoric and historic archaeological resources, sacred sites, and human remains cannot be ensured. Therefore, the project's contribution to a cumulative prehistoric and historic archaeological resources, sacred sites, and human remains impact would be cumulatively considerable, and impacts would be significant and unavoidable.

6.2.6.3 Tribal Cultural Resources

The geographic context for the analysis of cumulative impacts to TCRs is considered to be the County. As stated in Section 5.6, development implemented in accordance with the project would potentially result in significant impacts to TCRs and would be required to implement Mitigation Measure **MM HIST 5.6-1** to minimize impacts. The project, along with other cumulative projects, would be required to comply with the City's General Plan policies promoting the identification, protection, and preservation of archaeological

resources. They would also be required to comply with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which require review of ministerial and discretionary permit applications for any parcel identified as sensitive on the Historical Resources Sensitivity Maps. However, the feasibility and efficacy of this mitigation measure cannot be determined at a program level, and impacts to TCRs would remain significant and unavoidable.

Cumulative projects in the County have the potential to result in a cumulative impact associated with the loss of TCRs through development activities that could cause a substantial adverse change in the significance of a TCR. These sites may contain artifacts and resources associated with tribal cultural values and religious beliefs. Any cumulative projects that involve ground-disturbing activities have the potential to result in significant impacts on TCRs. In the event TCRs are discovered, each individual project would be required to comply with the applicable regulatory requirements and the consultation requirements of SB 18 and AB 52, as applicable, to determine and mitigate any potential impacts to TCRs. Therefore, the impacts to TCRs from planned construction and development projects in the San Diego region would result in a significant cumulative impact.

Any cumulative projects that involve ground-disturbing activities would be required to implement measures similar to Mitigation Measure **MM HIST 5.6-1** to reduce impacts to TCRs. However, similar to the project, the feasibility and efficacy of these measures to adequately protect TCRs cannot be determined at this program level of analysis. Therefore, the project's contribution to a cumulative TCRs impact would be cumulatively considerable, and impacts would be significant and unavoidable.

6.2.7 Hydrology and Water Quality

6.2.7.1 Flooding and Drainage Patterns

The geographic context for the analysis of cumulative impacts to flooding and drainage alteration is the Los Peñasquitos Watershed. As discussed in Section 5.7, the project would not result in substantial changes to drainage patterns or increase impervious surfaces. Conversely, the project would reduce the number of impervious surfaces compared to the existing condition. The project would also create additional wetland habitat, which would reduce the risk of flooding.

Cumulative projects would generally result in an increase in impervious surfaces, which has the potential to result in an increase in stormwater flows. However, future development would be subject to federal, state, and local regulations, such as the National Pollutant Discharge Elimination System permit, that are designed to reduce stormwater runoff from project sites by promoting infiltration, minimizing impervious surfaces, and requiring a no-net increase in flows over the existing condition through hydromodification processes. Any short-term impacts resulting from alterations of drainage and hydrology would be minimized with the incorporation of appropriate construction BMPs and operational compliance with the National Pollutant Discharge Elimination System permit and City's Stormwater Standards Manual. A significant cumulative impact would not occur.

Therefore, the project, in combination with other cumulative projects, would not result in a significant cumulative impact. The project's contribution would not be cumulatively considerable.

6.2.7.2 Water Quality

The geographic context for the analysis of cumulative impacts with regard to water quality is the Los Peñasquitos Watershed, including Mission Bay. As discussed in Section 5.7, the immediate pollutants of concern are those that contribute to the eutrophic conditions at the mouth of Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. To preserve local hydrology and water quality resources, preliminary BMPs are recommended to address potential impacts. A Stormwater Quality Management Plan in accordance with the City's Stormwater Manual must accompany the final design of the project to ensure that runoff is adequately captured/treated.

Cumulative projects would generally result in an increase in impermeable surfaces and an increase in runoff of stormwater pollutants contributing to a cumulative increase in impacts to water quality. Similar to the project, future development would be subject to federal, state, and local applicable regulations and the City's Stormwater Standards Manual that requires the preparation of a Stormwater Quality Management Plan. Cumulative projects would be designed to reduce the discharge of stormwater pollutants and improve water quality. Cumulative project compliance with applicable laws and regulations and incorporation of required construction and operational BMPs would ensure that a significant cumulative impact would not occur.

Therefore, with implementation of a Stormwater Quality Management Plan and implementation of BMPs, the project, in combination with other cumulative projects, would not result in a significant cumulative water quality impact. The project's contribution would not be cumulatively considerable.

6.2.7.3 Groundwater

A significant cumulative impact related to groundwater supplies and recharge would occur if development would increase the number of impervious surfaces, which would decrease the amount of recharge received by the groundwater table and decrease groundwater supplies. Therefore, increased impervious areas associated with construction of cumulative development projects would result in a significant cumulative impact to groundwater supplies and recharge. However, as discussed in Section 5.7, the project would reduce the number of impervious surfaces and would not impede groundwater recharge. Therefore, the project's contribution would not be cumulatively considerable.

6.2.8 Noise

6.2.8.1 Ambient Noise

The geographic context for the analysis of cumulative impacts with regard to ambient noise includes only those projects within proximity to Mission Bay Park. As discussed in Section 5.8, Noise, during operation, the project is anticipated to result in an overall decrease in ambient traffic noise levels when compared to existing conditions due to fewer vehicle trips related to the reduced development intensity in the project area. In addition, the removal of the developed areas of Campland, the vacant mobile home park, the RV park, and the Boat and Ski Club, and implementation of natural habitat and recreational land uses in the De Anza Cove "boot" area is anticipated to result in relocation of existing on-site noise sources away from nearby noise-sensitive receptors and a net reduction in construction and operational noise from the project area to adjacent noise-sensitive land uses.

Cumulative projects would have the potential to increase activity in the planning area and introduce new sources of stationary noise such as heating, ventilation, and air conditioning systems. However, noise exposure from increased activity would generally be localized in nature, and stationary sources would be subject to the City's Noise Ordinance Standards. Therefore, a cumulative noise impact would not occur.

The project, in combination with other cumulative projects, would not result in a significant cumulative impact related to ambient noise.

6.2.8.2 Vehicular Noise

The geographic context for the analysis of cumulative impacts with regard to vehicular noise includes only those projects within proximity to Mission Bay Park. As discussed in Section 5.8, the project would result in an overall reduction in vehicle trips because the project would reduce development density in the project area, which would lead to a reduction in vehicular noise compared to the existing conditions. The project would not result in any additional contribution to regional vehicle noise levels.

Cumulative projects would have the potential to change traffic patterns, generate new vehicle trips, or develop new sensitive receptors in high-activity areas that may result in the exposure of sensitive receptors to noise levels that exceed standards established in the Transportation Element of the City's General Plan and City's Noise Ordinance Standards. However, if that is the case, these projects would be required to implement mitigation measures that would reduce potentially significant vehicular noise impacts. Therefore, the project's contribution would not be cumulatively considerable.

6.2.8.3 Airport Compatibility

The geographic context for the analysis of cumulative impacts regarding airport compatibility includes those projects in the Montgomery-Gibbs Executive Airport and the SDIA AIA. Impacts related to airport compatibility are site specific and are not cumulative in nature. As discussed in Section 5.8, neither exterior nor interior noise compatibility impacts would occur at any of the proposed land uses in the project area. The project would not combine with any cumulative project to increase airport noise exposure. A significant cumulative impact related to airport compatibility would not occur, and the project's contribution would not be cumulatively considerable.

6.2.8.4 Noise Ordinance Compliance

The geographic context for the analysis of cumulative impacts regarding Noise Ordinance compliance includes only those projects within proximity to Mission Bay Park. As discussed in Section 5.8, during operation, the project is anticipated to result in a reduction in noise at adjacent noise-sensitive land uses due to a reduction in development density in the project area. Cumulative projects would have the potential to introduce new noise sources in the cumulative project areas. However, the City's Noise Ordinance Standards would continue to be enforced. Identified cumulative projects are primarily planning documents that include natural resources, mixed-use and residential development, and recreational facilities that would not be expected to include any unusual stationary noise components that could not demonstrate Noise Ordinance compliance. Increased activity would be limited to project

areas and would not be expected to combine to result in ambient noise levels that exceed Noise Ordinance Standards. Therefore, a significant cumulative noise impact would not occur.

Therefore, the project, in combination with cumulative projects, would not result in a significant cumulative impact related to Noise Ordinance compliance. The project's contribution would not be cumulatively considerable.

6.2.8.5 Temporary Construction Noise

The geographic context for the analysis of cumulative impacts regarding temporary construction noise includes only those projects within proximity to Mission Bay Park. As discussed in Section 5.8, project grading and paving activities together would exceed the City's Municipal Code Noise Ordinance Standard for construction (75 2-hour A-weighted equivalent sound level [dBA $L_{eq\ 12\text{-}hr}$]) by approximately 3 decibels (dB) when these activities take place adjacent to noise-sensitive receivers (residences and school recreational facilities north of the project area), resulting in a potentially significant noise impact during construction. Mitigation Measure **MM NOI 5.8-1** requires implementation of construction noise reduction measures to achieve compliance with the 12-hour average noise level limit of 75 dBA L_{eq} established in the City's Municipal Code, Section 59.5.0404. With the implementation of Mitigation Measure **MM NOI 5.8-1**, construction noise impacts would be reduced to comply with the City's Municipal Code.

Operation of construction equipment required for development of cumulative projects and the project would have the potential to generate noise levels that may exceed the 12-hour average noise level limit of 75 dBA L_{eq} established in the City's Municipal Code, Section 59.5.0404. However, construction activities of cumulative projects would not occur at the same time or in the same location and would generally not combine to result in cumulative noise exposure.

Similar construction noise mitigation measures would be required, if necessary, for cumulative projects to achieve Noise Ordinance compliance and reduce impacts to below a level of significance. Therefore, the project, combined with other cumulative projects, would not result in a significant cumulative impact due to temporary construction noise. The project's contribution would not be cumulatively considerable.

6.2.8.6 Groundborne Vibration

Vibration is a localized phenomenon and is progressively reduced as the distance from the source increases. The geographic context for the analysis of cumulative impacts regarding groundborne vibration includes only those projects within proximity to Mission Bay Park. As discussed in Section 5.8, vibration levels resulting from demolition and construction equipment would not result in excessive groundborne vibration levels. In addition, leased commercial uses that may be constructed under the project, such as the non-motorized boat rental areas, would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries, and impacts would be less than significant.

Cumulative projects would have the potential generate groundborne vibration that would exceed vibration significance criteria at existing and planned sensitive receptors. However, if that is the case, these

projects would be required to implement mitigation measures that would reduce potentially significant vibration impacts. Therefore, the project's contribution would not be cumulatively considerable.

6.2.9 Paleontological Resources

The geographic context for the analysis of cumulative impacts to paleontological resources is considered to be the County. According to the San Diego County General Plan, there are a number of distinct geological rock units (i.e., formations) within the County that contain paleontological resources, such as bones, teeth, shells, and wood. Cumulative projects in the County have the potential to disturb these geologic formations and the fossils that they contain. However, previous development has also led to the discovery of many fossil sites that have been documented and added to the natural history records for the region.

As described in Section 5.9, Paleontological Resources, areas of the project are underlain by the Bay Point Formation, which is assigned a high paleontological resource sensitivity. Grading activities associated with future implementation of the project, specifically at the De Anza Cove peninsula, could potentially result in earthwork greater than 1,000 cubic yards into high sensitivity formations, or grading within proximity of the mapped location of a fossil recovery site that could potentially result in significant impacts to sensitive paleontological resources. Compliance with the City's Municipal Code, Section 142.0151, which requires paleontological resources monitoring when certain screening criteria are met, would ensure that project impacts would be less than significant.

Similarly, pursuant to City's Municipal Code, Section 142.0151, cumulative projects would be required to screen for grading quantities and geologic formation sensitivity and apply the appropriate requirements for paleontological monitoring. Regulatory compliance for future discretionary projects reviewed in accordance with CEQA would be assured through permit conditions or as notes on plans and would ensure that impacts to paleontological resources would be less than significant. Implementation of the General Grading Guidelines for Paleontological Resources, as required by City's Municipal Code, Section 142.0151, would ensure that a cumulative impact to paleontological resources would not occur.

Therefore, the project, in combination with other cumulative projects, would not result in a significant cumulative impact to paleontological resources. The project's contribution would not be cumulatively considerable.

6.2.10 Transportation and Circulation

6.2.10.1 Conflict with Adopted Transportation Program, Plan, Ordinance, or Policy

The geographic context for the analysis of cumulative impacts associated with conflicts with adopted transportation program, plan, ordinance, or policy is the City. A significant cumulative impact would occur if future projects would combine to be inconsistent with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle, and pedestrian facilities. As discussed in Section 5.10, Transportation and Circulation, implementation of the project would not restrict or impede connectivity and would plan for implementation of additional bicycle and pedestrian facilities in the project area. The project would be consistent with the City's General Plan Mobility Element, the City's Complete Communities: Mobility Choices Program, SANDAG's 2021

Regional Plan, and the City's Bicycle Master Plan and would not conflict with any adopted policies or plans addressing pedestrian, bicycle, and transit facilities.

Similar to the project, cumulative projects would have to demonstrate consistency with existing adopted plans or require mitigation measures to ensure consistency for project approvals to occur.

Therefore, the project, in combination with other cumulative projects, would not result in a significant cumulative impact due to conflicts with adopted policies. The project's contribution would not be cumulatively considerable.

6.2.10.2 Vehicle Miles Traveled

The geographic context for the analysis of cumulative impacts associated with vehicle miles traveled (VMT) is considered to be the City. The City has adopted significance thresholds and specific VMT metrics used to measure VMT by land use type. Cumulative projects could result in substantial VMT that could exceed the regional mean. As discussed in Section 5.10, because the project's proposed land uses would be similar to existing land uses but the overall development density would be lower, the project is likely to generate fewer VMT. A market capture study, details of which can be found in Appendix L, Transportation Impact Analysis, was conducted to determine the effect of the project on the regional VMT by evaluating the service area of publicly accessible coastal guest accommodation facilities with and without the project. With the implementation of the project, the service area would be divided more evenly among the accessible coastal guest accommodation facilities, resulting in more localized trips and, therefore, fewer VMT. Therefore, the project would not contribute to a significant cumulative regional VMT impact. The project's contribution would not be cumulatively considerable.

6.2.10.3 Design Hazards

The geographic scope of cumulative impacts for increases in traffic hazards is Mission Bay Park and the Pacific Beach Community Planning Area. As discussed in Section 5.10, all roadway and intersection improvements associated with the project would be constructed in accordance with the City's Municipal Code, Standard Drawings, and Street Design Manual. With adherence to these requirements, implementation of the project would not increase hazards due to a design feature or incompatible use.

A significant cumulative impact would occur if cumulative projects would create traffic hazards through design or incompatible uses. Cumulative projects would also be required to be designed and constructed according to the City's roadway design standards and requirements, which would ensure that no significant impact would occur. Thus, cumulative projects would not result in a significant cumulative impact associated with increases in traffic hazards.

Therefore, the project, in combination with other cumulative projects, would not result in a significant cumulative impact due to traffic design hazards. The project's contribution would not be cumulatively considerable.

6.2.10.4 Inadequate Emergency Access

The geographic context for the analysis of cumulative impacts relative to inadequate emergency access would be the City. The project's design would be consistent with the City's fire apparatus access roadway requirements, as outlined in California Fire Code, Section 503, which includes requirements for emergency access.

Cumulative projects would have the potential to result in inadequate emergency access if they block access roads or if off-site road improvements would result in the closure of roads. Construction and operation associated with future development could result in activities that could interfere with emergency access, such as temporary construction barricades or other design obstructions that could impede emergency access. Cumulative projects would be required to comply with the City's fire apparatus access roadway requirements as outlined in California Fire Code, Section 503, which includes requirements for emergency access. Compliance with applicable regulations would ensure that cumulative projects do not result in a significant impact associated with inadequate emergency access.

Thus, the project, in combination with other cumulative projects, would not result in a significant cumulative impact associated with inadequate emergency access. The project's contribution would not be cumulatively considerable.

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Chapter 7.0
Other Mandatory Discussion Areas

The California Environmental Quality Act (CEQA) Guidelines require that an Environmental Impact Report (EIR) contain a discussion of impacts associated with growth inducement, effects found not to be significant, significant, unavoidable environmental impacts, and significant, irreversible environmental changes. Each of these discussion areas is addressed in the following sections.

7.1 Growth Inducement

This Program EIR (PEIR) must examine the potential growth-inducing impacts of the proposed De Anza Natural Amendment to the Mission Bay Park Master Plan (project). More specifically, CEQA Guidelines, Section 15126.2(e), requires that an EIR:

> Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. . . . It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

According to the City of San Diego's (City's) CEQA Significance Determination Thresholds (City of San Diego 2022), growth inducement "is usually associated with those projects that foster economic or population growth, or the construction of additional housing either directly or indirectly, which may result in the construction of major new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment." In addition, the thresholds state that "the analysis must avoid speculation and focus on probable growth patterns or projects."

The entire project area falls within the boundaries of the adopted Mission Bay Park Master Plan (MBPMP). The MBPMP serves as the Local Coastal Program for this area of the City, and the project is subject to the goals and recommendations established in the MBPMP. The project would incorporate these recommendations and other components, as discussed in Chapter 3.0, Project Description, of this PEIR.

The project includes natural areas, such as upland areas, wetland areas, and open beach; lease areas, such as nonprofit and commercial leases that would provide recreational opportunities to visitors; regional parkland for activities such as picnicking, kiteflying, jogging, and informal sports; and active recreation areas, such as sand volleyball, walking, and in-line skating. It is expected that improving and increasing areas allowing for these activities would introduce additional visitors to the project area for recreational activities but would not introduce additional residents to the area. It is expected that the project would serve existing residents of the San Diego area, as well as visitors. However, it is not expected that additional residents would relocate to the area as a result of the project.

The project supports alternative transportation modes, such as walking and biking, and the project area currently connects to existing City roadways, bicycle paths, pedestrian paths and bus routes.

The project would not foster economic or population growth or cause the construction of additional housing either directly or indirectly. The proposed low-cost visitor guest accommodations would replace the existing overnight recreational uses currently provided by Campland on the Bay (Campland) and the Mission Bay RV Resort. The project would result in the reduction in density in the project area to increase habitat restoration, which would not increase economic growth. The project would not promote growth patterns resulting in the need for and/or provision of new utilities because the proposed new low-cost visitor guest accommodations are planned in areas with existing utility hook-ups and would replace the guest accommodations currently on site. The project would not support unplanned population growth.

Future project construction would be associated with a demand for construction trade skills and labor. In addition, operation would be associated with hospitality labor and park maintenance staff positions. It is anticipated that this demand would be met by the local labor force within San Diego County or surrounding areas and would not require the importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing.

Therefore, the project is not anticipated to result in overall regional population growth, and there would be no impacts due to growth inducement.

7.2 Effects Found Not to be Significant

CEQA Guidelines, Section 15128, requires that an EIR contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore are not discussed in detail in the EIR. The impacts associated with the following issue areas were found not to be significant as a result of the project:

- Agricultural and forestry resources
- Energy conservation

- Geologic conditions
- Mineral resources
- Population and housing
- Public services and facilities
- Public utilities
- Visual effects and neighborhood character

7.2.1 Agricultural and Forestry Resources

According to the California Department of Conservation Farmland Mapping and Monitoring Program, the project area is classified as Urban and Built-Up Land (DOC 2018a). The entire project area is designated as Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008). There are no Williamson Act lands within the City. No forest, timberland, or timberland production zones are present in the project area. No farmlands or forest lands are present in the project area. No impact to agricultural or forestry resources would occur.

7.2.2 Energy Conservation

7.2.2.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

The project considered in this PEIR is the adoption of an amendment to the MBPMP and does not propose any specific development projects; therefore, impacts to energy resources are addressed generally based on projected buildout of the project. Depending on the types of futures uses, impacts would need to be addressed in detail at the time specific projects are proposed. At a minimum, future projects implemented in accordance with the project would be required to meet the mandatory energy standards of the current California Energy Code (Title 24, Building Energy Standards, of the California Public Resources Code). Because the project is proposing less development density and more natural areas, the energy use is anticipated to decrease. Energy resources would be consumed during construction of future development under the project and would also be consumed to provide operational lighting, heating, cooling, and transportation for future development.

a. Construction-Related Energy Use

During construction, energy use through temporary electric power for lighting and electronic equipment (such as computers inside temporary construction trailers and heating, ventilation, and air conditioning) would be provided by San Diego Gas & Electric. The amount of electricity used during construction would be minimal because typical demand stems from the use of several construction trailers used by managerial staff during the hours of construction activities in addition to electric hand tools. Operation of equipment used during construction would require petroleum use. Fuels used for construction would primarily consist of diesel and gasoline. While use of natural gas is not anticipated to be required during the construction of the project, any potential minor amounts of natural gas that may be consumed as a result of project construction would be temporary and negligible and would not have an adverse effect. In addition, natural gas is not anticipated to be required during the operation of the project.

At the program level of analysis, it is too speculative to comprehensively quantify the construction-related energy consumption of future development, either in total or by fuel type. Although the exact details of the projects that could be implemented in accordance with the project are not known at this time, construction activities would be temporary, and no known conditions in the project area would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Petroleum, including diesel and gasoline, would be consumed throughout the construction of the project. Fuel consumed by construction equipment would be the primary energy resource expended during construction, including the transportation of construction materials and construction worker commutes. It is assumed that heavy-duty construction equipment, as well as haul trucks involved in moving dirt around the project area, would require diesel fuel. Construction workers would travel to and from the project area using a mix of electric and gasoline-powered vehicles throughout the duration of construction. A conservative analysis would assume that construction workers would travel to and from the project area solely in gasoline-powered vehicles. Petroleum use during the construction of the project would be temporary and minimal.

Furthermore, construction equipment used for future development projects is anticipated to become more efficient as engines are replaced, exhaust systems are retrofitted, and older equipment is retired and new equipment meeting more stringent emission standards is put into service, thus further reducing construction-related energy consumption. Future projects would also be required to comply with the California Air Resource Board's Airborne Toxics Control Measures, which restrict heavy-duty diesel vehicle idling time to 5 minutes. Therefore, development implemented in accordance with the project would not result in the use of wasteful amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

b. Long-Term Operation-Related Energy Use

Transportation-Related Energy Use

Transportation energy use associated with the project would be attributed to trips by individuals traveling to and from the project area using passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by gasoline, diesel, or natural gas and could potentially be fueled by electricity. The project would support goals to reduce the use of fossil fuels by providing electric vehicle infrastructure to the extent required and improved pedestrian and bicycle facilities and connections to the surrounding community. The project would reduce overall development density on the site, which would decrease vehicle trips compared to the current baseline condition. Therefore, long-term buildout of the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of transportation-related energy. Impacts would be less than significant.

Building-Related Energy Use

At full buildout, the project's operational phase would require electricity for operating various project components, such as the low-cost visitor guest accommodations and boat facilities and clubhouse. These future site-specific projects would be required to demonstrate consistency with all applicable mandatory project design features in the City's Climate Action Plan Consistency Regulations that would reduce operational electricity consumption. Such features include replacing existing similar

land uses at a reduced density to increase habitat restoration and providing improved pedestrian and bicycle facilities and connections to the surrounding community. See Section 5.4, Greenhouse Gas Emissions, in this PEIR for additional discussion on the project's consistency with the City's Climate Action Plan. Future development implemented under the project would be required to meet the mandatory energy standards of California Green Building Standards Code (CALGreen) and the California Energy Code (24 CCR Part 6) in effect at the time of development and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilation, and air conditioning mechanical systems; water heating systems; and lighting. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting may be available as incentives for future development.

Implementation of the project would not result in substantial amounts of local or regional energy supplies compared to the existing baseline conditions. The project would design buildings to meet enhanced building energy efficiency standards compared to existing land uses because more stringent energy efficiency standards have been adopted since previous site development. Therefore, implementation of the project would not have a significant impact on the local utilities. Impacts would be less than significant.

7.2.3 Geologic Conditions

7.2.3.1 Geological Hazards

As discussed in the Geotechnical and Geological Hazards Technical Memorandum (Appendix M), ground rupture on active faults could affect Mission Bay Drive and the easternmost lease area portion of the project area. Liquefaction and seismically induced settlement would not adversely impact the natural areas, such as upland areas, wetland areas, and open beach. However, liquefaction, post-liquefaction settlement, and lateral spread would be taken into consideration during design of structures for human occupancy. The project area is relatively flat; therefore, landslides and slope stability would not affect the project area unless slopes were created during development. Geotechnical investigations would be required for future projects developed under the project if they involve the construction of structures or other improvements. Such investigation reports would provide recommendations for grading and foundation design to minimize potential geologic hazards. Adherence to state and local regulations, including the California Building Code and San Diego Municipal Code, as well as recommendations from future project-specific geotechnical investigation reports, would ensure an acceptable level of risk. Therefore, impacts from seismic hazards would be less than significant.

7.2.3.2 Increase in Erosion

Erosion control measures would be implemented within and surrounding the project area during excavation and demolition. All construction traffic would be directed to use existing paved roadways where feasible. Exposed soils would be stabilized with tackifiers and soil stabilizers or revegetation (long-term) to reduce wind erosion and stormwater erosion. Silt fences would be installed where appropriate to retain all stormwater in the project area. Stormwater would then be allowed to settle, and any sediment that precipitated out of the stormwater runoff would be cleaned and replaced from where it was eroded. Topsoil would be maintained through long-term best management practices

such as revegetation, and stormwater would be directed to areas that are reinforced with riprap and erosion-reducing permanent best management practices in accordance with the National Pollutant Discharge Elimination System Permit and required Stormwater Pollution Prevention Plan. Topsoil is not expected to be substantially lost, and the project area is not expected to have substantial erosion. With implementation of the excavation and fill placement methods recommended in Appendix M, as well as compliance with the National Pollutant Discharge Elimination System Permit and required Stormwater Pollution Prevention Plan, impacts associated with potential soil erosion and topsoil loss would be less than significant.

7.2.3.3 Unstable Geological Unit

Liquefaction, seismically induced settlement, or lateral spread would not adversely impact the natural areas, such as upland areas, wetland areas, and open beach. Liquefaction, post-liquefaction settlement, and lateral spread would be taken into consideration during design of structures for human occupancy, such as the proposed low-cost visitor guest accommodations. Potential impacts would be reduced to an acceptable level of risk by implementing geotechnical and structural engineering design recommendations in accordance with the California Building Code and other applicable standards. Damage to pavement associated with liquefaction would be repairable. With the implementation of existing regulatory requirements, such as the California Building Code, potential impacts from geologic instability would be less than significant.

The project area includes soils ranging from low- to non-expansive in nature. None of these soils would pose a significant risk to the development of the project. Impacts would be less than significant**.**

7.2.4 Mineral Resources

The project area is on land that is designated as MRZ-1. MRZ-1 lands, as defined in the City's General Plan (City of San Diego 2008), are not considered a locally important mineral resource site; rather, they are known as an area where available geologic information indicates that little likelihood exists for the presence of significant mineral resources (DOC 2018b). Therefore, no impact to mineral resources would occur as a result of the project.

7.2.5 Population and Housing

As discussed in Section 7.1, Growth Inducement, the project would include natural areas, such as upland areas, wetland areas, and open beach; low-cost visitor guest accommodations; lease areas; regional parkland; and recreation areas, but the project would not introduce additional residents to the area. As such, the project would not introduce substantial population growth in the area either directly or indirectly.

Currently, the southern area of the project area currently consists of the vacated De Anza Cove mobile home park, Campland, and De Anza Cove area. The project would replace the abandoned mobile home park with low-cost visitor guest accommodations. However, since the existing mobile home park housing is already abandoned, the project would not displace existing housing or people from the area, necessitating the construction of housing elsewhere. Implementation of the project would not result in the construction of housing, and impacts to population and housing would be less than significant.

7.2.6 Public Services and Facilities

7.2.6.1 Fire Protection and Emergency Services

Implementation of the project would not result in an increase in population or promote growth patterns because the project would not change the types of land uses on the site, and the overall development density would be reduced compared to the existing baseline condition. The San Diego Fire-Rescue Department would be able to maintain adequate response times within the project area. Existing capital facilities and workforce (fire stations, fire trucks, and personnel) would be adequate to meet the anticipated demand for fire protection associated with implementation of the project. Furthermore, the Fire-Rescue Department already provides lifeguard staffing for De Anza Cove. Therefore, implementation of the project would result in no impacts associated with the construction of new or physically altered facilities in order to maintain service ratios, response times, or other performance objectives related to fire/life safety protection.

7.2.6.2 Police Services

Although the San Diego Police Department currently provides adequate service to the project area, changes to police staffing or facilities, if any, would be dependent on division and Citywide needs as determined by the San Diego Police Department. The San Diego Police Department plans operational needs based on future growth in the City overall and would take into account service to all parkland, including De Anza Cove. Thus, no new construction of police facilities that could result in physical changes to the environment would occur as a result of implementation of the project. Impacts related to police services would be less than significant.

7.2.6.3 School Facilities and Other Public Facilities

The project includes natural areas, such as upland areas, wetland areas, and open beach; lease areas, such as nonprofit and commercial leases that would provide recreational opportunities to visitors; regional parkland; and active recreation areas. It is expected that improving and increasing these areas would introduce additional visitors to the project area for recreational activities but would not introduce additional residents to the area. It is expected that the project would serve existing residents of the San Diego area, as well as visitors. Therefore, the project would not indirectly induce population growth that could result in a need to provide school facilities for school-aged children or other public facilities including libraries, or result in the deterioration of existing facilities. Thus, no new construction of school facilities or other public facilities, including libraries, that could result in physical changes to the environment would occur as a result of implementation of the project. Impacts would be less than significant.

7.2.7 Public Utilities

7.2.7.1 New or Expanded Utilities

The project is not expected to increase demands on utilities and infrastructure improvements because the project consists of the construction of similar types of land uses at a reduced development density compared to existing uses, thus reducing overall utility demand. Additionally, the MBPMP EIR (City of

San Diego 1994) concluded that development activities are not anticipated to result in the need for new utility systems or require substantial alterations to existing power, natural gas, or communications systems (City of San Diego 1994). The project would be consistent with the MBPMP EIR.

7.2.7.2 Water

The project area is connected to the City's municipal water system via underground pipelines, which connect the project area infrastructure to the City's system to the north. The project would include a new low-cost visitor guest accommodation area and boat facility that would require water connections. The specifics of the utilities and infrastructure improvements would depend on the future site-specific design details of the project that are not known at this time. Due to the proposed demolition of Campland and the Mission Bay RV Resort, any new water connections and supply needs within the project area are not expected to exceed the current water usage due to the lower density proposed in the project. At buildout the project's water demand would represent a small fraction of the City's water demand. Compared to the existing conditions, the project would result in a decrease in acreage of land uses that would rely on water (e.g., guest accommodations; regional parkland; leases; and the Mission Bay Tennis Center, Athletic Fields, and Golf Course). Refer to Table 3-1, Existing Land Use Acreages, and Table 3-2, Proposed Land Uses Acreages, in this PEIR for a comparison of the existing and proposed land use acreages. Additionally, future development associated with the implementation of the project would be required to comply with the construction and design criteria outlined in the City's Water Facility Design Guidelines (City of San Diego 2021a), as well as any other applicable federal, state, and regional regulations. Adherence to these regulations would ensure that impacts related to an excessive amount of water use would not occur.

7.2.7.3 Solid Waste

During construction of the project, existing structures associated with Campland, the Mission Bay RV Resort, and the abandoned De Anza Cove mobile home park would be demolished, resulting in solid waste and construction debris that would be disposed of in the Miramar Landfill. The Miramar Landfill has a remaining capacity of approximately 11.08 million cubic yards of solid waste. It is anticipated that the landfill will reach its maximum capacity by December 2031, and the maximum permitted capacity is 97.35 million cubic yards (CalRecycle 2019). The privately operated Sycamore Landfill is also a potential destination for waste. Future development associated with the project would be required to comply with the City's Refuse, Organic Waste, and Recyclable Materials Storage Regulations (Municipal Code, Section 142.08), Recycling Ordinance (Municipal Code, Section 66.07), and Construction and Demolition Debris Diversion Deposit Ordinance (Municipal Code, Section 66.06). In addition, per the City's CEQA Significance Determination Thresholds, any future discretionary development exceeding the 60-ton threshold for projects 40,000 square feet or more must prepare a Waste Management Plan targeting a 75 percent waste reduction as directed in Assembly Bill 341 and the City's Climate Action Plan. Therefore, solid waste impacts associated with project construction would be less than significant.

Operation of the project would not increase the generation of solid waste beyond the current baseline condition and would not require an increase in landfill capacity or construction of a new landfill. Compared to the existing conditions, the project would result in a decrease in acreage of land uses that generate waste (e.g., guest accommodations; regional parkland; leases; open beach; and the Mission Bay Tennis Center, Athletic Fields, and Golf Course). Please refer to Table 3-1 and Table 3-2 in

this PEIR for a comparison of the existing and proposed land use acreages. The project would not result in an increase in solid waste generation during operation and would not conflict with the achievement of a 75 percent waste diversion as targeted in Assembly Bill 341 and the City's Zero Waste Plan. Therefore, no solid waste impacts associated with project operation would occur.

7.2.8 Visual Effects and Neighborhood Character

7.2.8.1 Scenic Vistas or Views

Mission Bay is considered a valuable scenic resource, and public views to the project area are available from surrounding residential communities, recreational areas, and public roadways, including Interstate 5, Grand Avenue, North Mission Bay Drive, Mission Bay Drive, Crown Point Drive, Morena Boulevard, and streets in the hillside community east of the project area. Additionally, the portion of Interstate 5 with views to the project area is an eligible State Scenic Highway.

The project would result in an overall reduction of developed land within the project area. For example, the project would replace Campland with wetlands and habitat area, expanding the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP). This change would be in accordance with the MBPMP recommendation to replace Campland with habitat area. Views of the paved RV campground, campground facilities, and fencing and vegetation that surround Campland would be replaced with views of wetland and upland habitat similar to what currently exists in the KFMR/NWP. By replacing views of Campland with relatively flat wetland and upland habitat, views of the bay and other natural scenic resources within the project area would be enhanced and expanded. Motorists and residents on Pacific Beach Drive would have direct views to the bay and KFMR/NWP wetland habitat area and those on Crown Point Drive would have expanded views of the wetland habitat. In addition, the proposed low-cost visitor guest accommodation area would have a smaller footprint than the existing Campland and Mission Bay RV Resort. The Mission Bay Boat and Ski Club would be replaced with wetlands and buffers adjacent to the Rose Creek inlet and with additional athletic uses and passive park features.

As a result, the project would not result in a substantial obstruction of any vista or scenic view within the project area. Rather, by increasing the habitat area and reducing the amount of development, the project would enhance and create additional opportunities for public views in the project area. Impacts to scenic vistas or views would be less than significant**.**

7.2.8.2 Neighborhood Character

The project area is characterized as a water-oriented recreation environment. The surrounding residential community is characterized as medium to medium-high density because there is a mix of single-family residences and multi-unit condominium or apartment buildings.

New development associated with the project would be limited to 30 feet in height as allowed in the Coastal Overlay Zone by the City (City of San Diego 2008). As indicated in the MBPMP Design Guidelines (City of San Diego 2021b), any buildings that would be added to the area (e.g., guest accommodations, campground amenities, and recreational amenities) "should be contemporary and responsive to the aquatic environment, avoiding excessive or exaggerated thematic styles." Further, because the horizontal elements within the bay environment (e.g., water, sand, marshes, and grass) define the viewshed, the MBPMP Design Guidelines indicate that building massing should be

interrupted, which would allow for the landscape elements to remain prominent in the viewshed (City of San Diego 2021b). Thus, because future development associated with the project would not involve building massing that would create a new horizontal feature (e.g., long, uninterrupted buildings) or conflict with the MBPMP Design Guidelines, implementation of the project would not contrast with the character of the landscape. Overall, the removal of development in the project area (Campland, De Anza Cove mobile home park, Mission Bay RV Resort, and Mission Bay Boat and Ski Club) would result in a reduction of bulk, mass, and scale from the project viewshed. With adherence to the MBPMP Design Guidelines (City of San Diego 2021b), impacts to neighborhood character would be less than significant.

7.2.8.3 Distinctive or Landmark Trees

The City allows for distinctive trees to be nominated for protection as heritage or landmark trees. Further, the Pacific Beach Community Plan recommends retaining existing trees as an important method of conserving the community's natural resources (City of San Diego 2019). No designated heritage or landmark trees are within the project area; however, a number of large, mature trees contribute to the character and aesthetics of the area. The project would retain existing trees in the project area to the greatest extent possible. The project would not result in the loss of any designated heritage or landmark trees within the project area as identified in the MBPMP; therefore, no impact would occur.

7.2.8.4 Landform Alteration

The project would replace the existing Campland with habitat area, which would include a combination of wetlands and upland habitats. This would result in landform alteration, as the majority of land within Campland is currently a flat, paved surface. The project includes enhancement and restoration within City-owned portions of the existing KFMR/NWP, the expansion of wetlands in the area currently occupied by Campland, and the expanded marshland/habitat, open beach, and open water in the De Anza Cove area. These landform alterations would result in an increase in habitat areas, which would be consistent with the current MBPMP. Additional landform alterations would include beach enhancements, a boat rental dock, mounded, naturalistic landforms, and water quality basins and vegetated swales. While the project would result in changes to the existing landform, the proposed landform alterations would serve to increase resilience of the area in the event of sea level rise, expand and restore habitat areas, and enhance recreational opportunities. Additionally, proposed enhancements would be in accordance with the MBPMP. Impacts from landform alteration would be less than significant.

7.2.8.5 Light and Glare

Implementation of the project would result in additional sources of light at various points in the project area, particularly in the low-cost visitor guest accommodation area and the De Anza Cove Park area. Further, in accordance with the MBPMP Design Guidelines, path and parking lot lighting would be implemented for nighttime use and security purposes. The MBPMP Design Guidelines indicate that "lighting should be provided by cut-off, non-glare pole fixtures. The height of light fixture shall be 12 to 15 feet above the adjacent surface of the path" (City of San Diego 2021b). Additionally, where paths or lit areas affront residential or resort hotel areas, "2-1/2 to 3-1/2 feet height bollard-type lights should be

used . . . so as not to affect the nighttime view of the Bay from residences and guest rooms" (City of San Diego 2021b). Therefore, downward-pointing, lower-intensity lights would be used. This type of lighting would comply with the Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines, which require lighting of all developed areas adjacent to the MHPA to be directed away from the MHPA. This type of lighting would not affect motorists on nearby roads or residents in nearby neighborhoods. Lastly, in accordance with the MBPMP Design Guidelines, lighting would be functional and not ornamental. Therefore, impacts due to additional sources of light and glare would be less than significant.

7.3 Unavoidable, Significant Environmental Impacts

In accordance with CEQA Guidelines, Section 15126.2(c), any significant unavoidable impacts of a project, including those impacts that can be mitigated but not reduced to below a level of significance must be identified in the EIR. For the project, impacts related to historical, archaeological, and Tribal Cultural Resources would remain significant and unavoidable. All other significant impacts identified in Chapter 5.0, Environmental Analysis, of this PEIR can be reduced to below a level of significance with implementation of the mitigation framework identified in Chapter 5.0 and through compliance with adopted General Plan and proposed MBPMP policies and applicable federal, state, regional, and/or local regulations.

7.4 Significant, Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines requires an evaluation of the significant, irreversible environmental changes that would occur should the project be implemented.

Irreversible changes typically fall into three categories:

- Primary impacts, such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources, and archaeological, historical, and Tribal Cultural Resources)
- Primary and secondary impacts, such as highway improvements that provide access to previously inaccessible areas
- Environmental accidents potentially associated with the project

7.4.1 Impacts Related to Nonrenewable Resources

Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitment of resources should be evaluated to ensure that current consumption of such resources is justified. Implementation of the project would not result in significant, irreversible impacts to agricultural land, forestry resources, biological habitat, energy, mineral deposits, or water bodies. Although sensitive biological resources are identified within the project area, which could be impacted with future development, direct and indirect impacts can be offset through regulatory compliance (with the Multiple Species Conservation Program Subarea Plan, Biology Guidelines, and Environmentally Sensitive Lands regulations of the Land Development Code) and the mitigation framework identified in Section 5.3, Biological Resources. As evaluated in Section 7.2, Effects Found Not to be Significant, implementation of the project would not result in significant, irreversible impacts to agricultural, forestry, or mineral resources. Water bodies in the project area include Rose Creek inlet and Mission Bay. With compliance with the National

Pollutant Discharge Elimination System and City's Stormwater Standards Manual, implementation of the project would not directly impact these water bodies. Indirect impacts to these resources would be avoided through implementation of the mitigation framework identified in Section 5.3, Biological Resources, as well as compliance with regulatory requirements as discussed in Section 5.7, Hydrology and Water Quality.

Construction of future development implemented in accordance with the project would require the irreversible consumption of natural resources and energy. Natural resource consumption would include lumber and other forest products, sand and gravel, asphalt, steel, copper, other metals, and water. Building materials, while perhaps recyclable in part at some long-term future date, would for practical purposes be considered permanently consumed. Energy derived from nonrenewable sources, such as fossil fuels, would be consumed during construction and as a result of operational lighting, heating, cooling, and transportation uses. Energy consumption is discussed in greater detail in Section 7.2.2, Energy Conservation, of this PEIR. Therefore, implementation of the project would result in a significant, irreversible commitment with regard to nonrenewal resources.

Future development within the project area could have an impact on important historical, archaeological, and Tribal Cultural Resources given the presence of known and potential historical, archaeological, and Tribal Cultural Resources within the project area. Potential impacts to historical, archaeological, or Tribal Cultural Resources would be mitigated through adherence to regulatory compliance (i.e., the Historical Resource regulations of the LDC) and implementation of the mitigation framework further detailed in Section 5.6, Historical, Archaeological, and Tribal Cultural Resources, of this PEIR, but would remain significant and unavoidable.

7.4.2 Impacts Related to Access to Previously Inaccessible Areas

The project area is currently accessible via regional transportation facilities (e.g., Interstate 5). No new freeways or roadways are proposed that would provide access to currently inaccessible areas. Therefore, implementation of the project would not result in a significant, irreversible impact regarding unplanned land use.

7.4.3 Impacts Related to Environmental Accidents

With respect to environmental accidents potentially associated with the project and as further discussed in Section 5.5, Hazards and Hazardous Materials, the project area is not on a list of hazardous materials sites compiled pursuant to California Government Code, Section 65962.5. However, based on the environmental database search, it was determined that contaminated soils could be encountered during construction. Potential impacts related to hazardous materials and associated health hazards from the implementation of the project would be avoided or reduced to below a level of significance through the implementation of mitigation measures identified in Section 5.5.5, Mitigation Framework.

No airports or related Accidental Potential Zones are within or adjacent to the project area. The San Diego International Airport and Montgomery Field Municipal Airport are the nearest airports to the project area, located approximately 4 miles south and northeast of the project, respectively. The

project area is not within any mapped Accidental Potential Zones for these airports. Thus, aircraft-related risks to the population within the project area is low.

Approximately 130.5 acres of the project are located on lands that are currently designated by the Federal Emergency Management Agency as susceptible to 500-year floods (FEMA 2019). Due to the reduction of guest accommodation acreage, removing a large portion of the De Anza Cove mobile home park from the De Anza peninsula and replacing Campland with expanded marshland habitat, fewer structures would be located within a 500-year flood zone. Land supporting guest accommodations may be built up using soil and debris removed from the Campland area to raise structures above flood risk levels. Additionally, the proposed multi-use path running along the Rose Creek inlet could be built up to serve as a levee and limit potential flooding.

Potential impacts related to the impairment of or interference with adopted emergency response and evacuation plans from the implementation of the project would be less than significant based on the nature of the proposed development, reduced development density, and required compliance with associated guidelines of adopted emergency response plans and procedures.

The potential for hazards related to wildland fires to visitors of the project area and nearby residences and businesses is considered less than significant due to project design, policies, and components that would not increase wildland fire hazards. Furthermore, the project is not located in a Very High Fire Severity Zone. No additional vegetation that would be considered a fuel source would be added as part of the project. No concentration of buildings and connection to other developed areas would be implemented as part of the project; therefore, the project would not increase the risk for wildland fires to spread throughout the project area. The project would provide for low-cost visitor guest accommodations, which could include campgrounds where campfires would be allowed in designated areas. Campfire areas would be limited to developed campgrounds and beach areas and would not be within heavily vegetated areas, which would reduce the risk of wildland fires. Fires allowed in beach areas shall be in accordance with the City's Municipal Code, Sections 63.20.5(c) and (d), which require the use of City-provided container rings. Campfires would be limited to the designated areas in the low-cost visitor guest accommodation areas.

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Chapter 8.0
Alternatives

8.1 Introduction

The California Environmental Quality Act (CEQA) Guidelines, Section 15126.6, requires that an Environmental Impact Report (EIR) "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). The alternatives selected for detailed review in the EIR may be limited to those that "would avoid or substantially lessen any of the significant effects of the project" and would "feasibly attain most of the basic objectives of the project." CEQA Guidelines, Section 15126.6(a), also provides that an EIR need not consider every conceivable alternative to a project. Instead, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. In addition, an EIR need not consider alternatives that are infeasible. This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (California Public Resources Code, Section 21002.1), the purpose of the alternatives discussion is to focus on alternatives to the project or its location that would avoid or substantially lessen any significant effects of the project, even if the alternatives would impede to some degree the attainment of the project's objectives or be more costly. Further, CEQA requires that an EIR identify the environmentally superior alternative from among the alternatives.

8.1.1 Criteria for Selection and Analysis of Alternatives

The criteria for the selection and analysis of alternatives are provided in CEQA Guidelines, Section 15126.6(c). The alternatives must (1) meet most of the project objectives, (2) be feasible, and (3) avoid or substantially lessen the significant impacts resulting from the project.

8.1.1.1 Project Objectives

The alternatives addressed in this Program EIR (PEIR) were selected based on the extent to which they would feasibly accomplish most or all of the project objectives described in Chapter 3.0, Project Description, of this PEIR, which are restated below:

1. Provide equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access.
2. Foster opportunities for members of local Tribal nations to reconnect to De Anza Cove.
3. Incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts.
4. Embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove.
5. Diversify active and passive recreational uses that will serve a range of interests, ages, activity levels, incomes, and cultures both on land and in water.
6. Enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities, including opportunities for multimodal travel.

8.1.1.2 Feasibility

CEQA Guidelines, Section 15126.6(f)(1), identifies the factors to be taken into account to determine the feasibility of alternatives. The factors are site suitability; economic viability; availability of infrastructure; General Plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and whether the project proponent can reasonably acquire, control, or otherwise have access to the alternative site. No one of these factors establishes a fixed limit on the scope of reasonable alternatives. An alternative does not need to be considered if its environmental effects cannot be reasonably ascertained, and if implementation of such an alternative is remote or speculative.

8.1.1.3 Evaluation of Significant Impacts

According to CEQA Guidelines, Section 15126.6(b), the alternatives discussion should focus on those alternatives that, if implemented, could eliminate or reduce any of the significant environmental impacts of a project. The alternatives are evaluated to determine if they would eliminate any significant adverse environmental impacts or reduce those impacts to a below a significant level. Project-related and cumulative impacts are those identified prior to the incorporation or implementation of any mitigation measures. As described in Chapter 5.0, Environmental Analysis, the proposed project would result in potentially significant impacts, prior to mitigation, for the following issues topics: biological resources; hazards and hazardous materials; historical, archaeological, and Tribal Cultural Resources (TCRs); paleontological resources; and noise. The project would result in potentially significant cumulative impacts, prior to mitigation, for the following issue topics: historical, archaeological, and TCRs.

The performance of an alternative relative to a project is evaluated to determine the "comparative merits of the alternative" (CEQA Guidelines, Section 15126.6[a]). The alternatives analysis is based on a comparison to the proposed project's impacts.

General descriptions of each of the alternatives, along with a discussion of their ability to reduce the significant environmental impacts associated with the proposed project, are provided in the following subsections.

8.2 Alternatives Considered and Eliminated

8.2.1 ReWild Mission Bay "Wild," "Wilder," and "Wildest" Alternatives

8.2.1.1 Description

In 2018, the San Diego Audubon Society prepared the ReWild Mission Bay: Wetlands Restoration Feasibility Study Report, which was the first step in protecting and restoring critical wetlands in Mission Bay (ReWild 2018). The report analyzed a range of alternatives. The "Wild" alternative considers the restoration of wetlands exclusively in the area currently occupied by Campland on the Bay (Campland), the Kendall-Frost Marsh Reserve/Northern Wildlife Preserve (KFMR/NWP) area, and the entirety of the De Anza Cove area. This alternative does not propose incorporating fill to the adjacent open water, resulting in a shallow water habitat, or any major modifications to the outlines of existing landforms. Following restoration, the "Wild" alternative would provide approximately 172 acres of wetland habitat (salt marsh to upland gradient); by the year 2100 (or 5.5 feet of sea level rise), the upland habitat would decrease to approximately 45 acres.

The "Wilder" alternative considers the minimum distribution of "Habitat-Oriented Recreation/Preservation" and accommodates 40 acres of guest housing in the De Anza Cove area. The "Wilder" alternative uses soil excavated from the Campland area to backfill approximately 38 acres of open water and to create mudflat, low salt marsh, and mid-high salt marsh. The "Wilder" alternative generally shows passive and active recreation in the area north of North Mission Bay Drive and in some areas in the De Anza Cove area. Following restoration, the "Wilder" alternative would provide 164 acres of wetland habitat (salt marsh to upland gradient); by the year 2100 (or 5.5 feet of sea level rise), the upland habitat would decrease to approximately 40 acres.

The "Wildest" alternative considers using soil from both the Campland area and from the De Anza Cove area to convert approximately 94 acres of open water to restore mudflat, low salt marsh, and mid-high salt marsh on both sides of Rose Creek. The "Wildest" alternative considers the restoration of wetlands in the area currently occupied by Campland, the KFMR/NWP area, and the entirety of the De Anza Cove area; however, areas that are currently occupied by open water would be converted to upland, transitional upland, mid-high salt marsh, low salt marsh, and mudflat. The "Wildest" alternative also represents a balanced cut and fill option because some areas would require removal soil, while others would be backfilled with soil. Following restoration, the "Wildest" alternative would provide approximately 227 acres of wetland habitat (salt marsh to upland gradient); by the year 2100 (or 5.5 feet of sea level rise), the upland habitat would decrease to approximately 75 acres, retaining approximately 120 acres of wetland (called for in the Mission Bay Park Master Plan [MBPMP]) over an 80-year project lifespan.

8.2.1.2 Rationale for Elimination

The "Wild," "Wilder," and "Wildest" alternatives would not feasibly accomplish most of the project objectives described in Chapter 3.0 and listed in Section 8.1.1.1. These alternatives would not be consistent with the intent of the currently adopted MBPMP because they would not provide the MBPMP-prescribed buffers from Rose Creek (approximately 200 feet). The project proposes a combined 250-foot setback along Rose Creek with wetland habitats and native plant uplands.

The MBPMP calls for a "balanced approach" (City of San Diego 2021a) with three components: recreation, commerce, and environment. In terms of land use allocation, the ReWild alternatives do not propose adequate non-habitat land areas that meet the objectives for a balance of uses like those requested by various stakeholders at public forums—namely active recreation, regional parklands, boating, and low-cost visitor guest accommodations. The project proposes 137.5 acres of the active recreation, regional parklands, boating, and low-cost visitor guest accommodation land uses that stakeholders have requested.

The "Wild" and "Wildest" alternatives would not fully consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5) because they lack sufficient site areas for a balance of land uses, including enough site area for recreation and low-cost visitor guest accommodation, and as a result, they would also not provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). The "Wilder" and "Wildest" alternatives would also fail to meet project objective 5 because they would reduce the amount of area available for aquatic recreation uses, such as the enjoyment of open beach sand activities and boating.

Therefore, while all three of these alternatives would identify environmental uses, they would not consider the range of active and passive recreational uses in the context of the MBPMP (project objective 5). These alternatives would not foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2) as the project would, and while these alternatives would provide bike and pedestrian pathways, they would not prioritize public access, connectivity, to the extent that the project would, or activation of the shoreline (project objective 6). The three ReWild alternatives would not enhance public access or provide equitable access to De Anza Cove because of how those plans laid out the habitat design to reduce access to the cove's shorelines compared to the project. Therefore, while these alternatives would meet project objectives 3 and 4 by incorporating climate adaptation strategies and embracing responsibility and stewardship of the environment, they would not meet most of the project objectives. Thus, they have been eliminated from further consideration.

8.2.2 Campland-Provided Plan Alternative

8.2.2.1 Description

Under the Campland-Provided Plan Alternative, Campland would be relocated to the other side of Rose Creek, and the current location of Campland would be converted to wetland habitat. This alternative would have golf and athletic fields located north of Mission Bay Drive and would designate most of the De Anza Cove area south of Mission Bay Drive for RV camping and parking.

8.2.2.2 Rationale for Elimination

The Campland-Provided Plan Alternative would meet project objective 5 by providing active and passive recreational uses that serve a range of interests, ages, activity levels, incomes, and cultures on land and in water. However, this alternative would not meet project objectives 1 and 2 because it would not provide equitable access to De Anza Cove and the coastal landscape for all San Diegans or foster opportunities for members of local Tribal nations to reconnect to De Anza Cove through an Interpretive Nature Center. In addition, this alternative would not meet project objectives 3 and 4 because this alternative would not incorporate climate adaptation strategies to increase resilience to climate change or mitigate potential sea level rise impacts or embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats in De Anza Cove due to reduced wetland enhancement and water quality features. Finally, this alternative would not prioritize public access, connectivity, or activation of the shoreline (project objective 6). In addition, this alternative would result in increased impacts to air quality and odor, greenhouse gas (GHG) emissions, noise, and traffic from increased construction activities and additional operational activity because the density of development and customer base for the RV camping would be greater compared to the proposed project. Therefore, this alternative has been eliminated from further consideration.

8.2.3 Mission Bay Gateway Plan Alternative

8.2.3.1 Description

Under the Mission Bay Gateway Plan Alternative, the KFMR/NWP would expand, and Campland would be converted to habitat, similar to the proposed project. The Mission Bay Gateway Plan Alternative would include active recreation amenities such as golf, playfields, tennis, an amphitheater, and an aquatic center. Additionally, this alternative would include a reconfigured golf course and clubhouse.

The Mission Bay Gateway Plan Alternative would not include natural recreation or habitat enhancement in the De Anza Cove area. Rather, the Mission Bay Gateway Plan Alternative would allow RVs and camping in the De Anza Cove "boot" area and add a marina south of Rose Creek.

8.2.3.2 Rationale for Elimination

This alternative would not be consistent with the MBPMP and would not meet most of the project objectives. The Mission Bay Gateway Plan Alternative would include biking and pedestrian paths that would enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities (project objective 6). However, due to the increase in active recreation and reduced habitat enhancement east of Rose Creek, this alternative would not incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise impacts and would not embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objectives 3 and 4). The Mission Bay Gateway Plan Alternative would not provide the range of active and passive recreational uses identified in the MBPMP (project objective 5) or provide enough equitable access to De Anza Cove and the coastal landscape for all San Diegans, particularly communities that have historically experienced barriers to access (project objective 1). In addition, this alternative would result in increased impacts to air quality, GHG emissions, noise, and traffic from additional operational activities and increased

impacts to water quality due to the increase in impervious surfaces, compared to the proposed project. Therefore, this alternative has been eliminated from further consideration.

8.3 Alternatives Selected for Further Analysis

8.3.1 No Project/No Build Alternative

8.3.1.1 Description

Under the No Project/No Build Alternative, an amendment to the MBPMP would not occur. The Mission Bay Tennis Center, Athletic Fields, and Golf Course, Campland, and KFMR/NWP would remain the same as the existing condition. The Mission Bay RV Resort would continue to operate as currently leased. The rest of the De Anza Cove area would remain a "Special Study Area" as currently designated in the MBPMP for active recreation, passive recreation, and regional recreation land uses.

8.3.1.2 Analysis of No Project/No Build Alternative

a. Land Use

The current MBPMP designates the Campland area as wetland. Under this alternative, Campland would remain in place, which would conflict with the MBPMP wetland designation. The proposed project would be consistent with the MBPMP because it would replace the land currently occupied by Campland with expanded marshland/habitat. In addition, the No Project/No Build Alternative would result in greater operational GHG emissions associated with mobile trips, areas sources, and energy sources due to the increased density of development and customer base compared to the proposed project. The No Project/No Build Alternative would not include the active transportation connections proposed by the project, which would reduce vehicle miles traveled (VMT) and associated GHG emissions in line with the goals and objectives of the San Diego Association of Governments' (SANDAG's) San Diego Forward: The Regional Plan (2021 Regional Plan) and the City's Climate Action Plan (CAP). The No Project/No Build Alternative would also not include any wetland enhancement or restoration activities in support of Strategy 5 of the City's CAP, which promotes the creation of resilient infrastructure and healthy ecosystems, and policies in the City's Climate Resilient SD Plan, which calls for supporting ecosystem and watershed functions and expanding natural features, including wetlands (see Policies TNE-1 and TNE-2). The No Project/No Build Alternative would not implement any multimodal improvements within the project area as called for by the Balboa Avenue Station Area Specific Plan (BASASP). Thus, the No Project/No Build Alternative would not be consistent with SANDAG's 2021 Regional Plan, the City's CAP, the City's Climate Resilient SD Plan, and the BASASP.

However, the No Project/No Build Alternative would be consistent with the current General Plan land use designation of Park, Open Space, and Recreation and would not result in a conflict with the City's General Plan. Because the No Project/No Build Alternative would not result in any development within the project area, it would not conflict with the City's Land Development Code (LDC) regulations or with California Coastal Act (CCA) requirements regarding development. However, because the No Project/No Build Alternative would not enhance and restore the Coastal Zone environment as called for in the CCA, it would not support the CCA to the same extent as the proposed project. Similar to the proposed project, the No Project/No Build Alternative would not result development that conflicts

with guidelines in the Mission Bay Park Natural Resource Management Plan (NRMP) that call for the protection and management of natural resources in Mission Bay; however, this alternative would not improve and enhance this resources as the proposed project would. The No Project/No Build Alternative would not result in any development that could conflict with the Pacific Beach Community Plan and Local Coastal Program (LCP) Land Use Plan. Finally, similar to the proposed project, the No Project/No Build Alternative would not be within the Airport Influence Area (AIA) of local airports and would not be subject to an Airport Land Use Compatibility Plan (ALUCP). The No Project/No Build Alternative would not conflict with the provisions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), or Vernal Pool Habitat Conservation Plan, nor would it conflict with the implementation of applicable requirements of the City's Environmentally Sensitive Lands (ESL) regulations or Biology Guidelines regarding the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources. Impacts related to conflicts with the City's MSCP SAP and Vernal Pool Habitat Conservation Plan would be less than significant, similar to the proposed project. As a result, the No Project/No Build Alternative would result in similar less than significant impacts as the proposed project.

b. Air Quality and Odor

This alternative would be consistent with the existing zoning of Park, Open Space, and Recreation but not the MBPMP's wetland designation for the site. Compared to the proposed project, the No Project/No Build Alternative would result in fewer construction-related air quality pollutant emissions because the current park conditions would remain and Campland would not be demolished. Under this alternative, Campland would remain in place and would conflict with the MBPMP, the underlying Master Plan for the site; therefore, this alternative would not be consistent with the assumptions in the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP). However, this alternative would not involve the enhancement and restoration of wetlands or the construction of low-cost visitor guest accommodations and active and passive recreational amenities, resulting in no construction-related air emissions compared to the proposed project. However, the No Project/No Build Alternative would result in greater operational emissions due to increased operational density and customer base, compared to the proposed project. Similar to the proposed project, the No Project Alternative/No Build Alternative would result in a less than significant impact related to odors because it would not introduce any new land uses typically associated with nuisance odors. Therefore, under the No Project/No Build Alternative, impacts associated with conflicts with the applicable air quality plan and operational air quality would be greater compared to the proposed project.

c. Biological Resources

Compared to the proposed project, the No Project/No Build Alternative would not result in any construction impacts to biological resources. Specifically, the No Project/No Build Alternative would not result in impacts to sensitive plant or wildlife species and would not remove developed land in exchange for additional jurisdictional aquatic resource area, including wetland and non-wetland waters, that would result in potentially significant direct impacts to jurisdictional aquatic resources. In addition, compared to the proposed project, this alternative would not result in increased natural area, potentially expanding the wildlife movement corridors and habitat connectivity in the area. As stated above, the No Project/No Build Alternative would not result in any development that would have direct or indirect impacts to sensitive habitats or species; thus, this alternative would comply

with City's MSCP SAP. Therefore, this alternative would result in reduced biological resources impacts compared to the proposed project. However, the proposed project would expand habitat areas, resulting in long-term benefits to wetland habitat, species, and the functions and values of the aquatic resources, which would not occur under the No Project/No Build Alternative.

d. Greenhouse Gas Emissions

Compared to the proposed project, the No Project/No Build Alternative would result in less construction-related emissions because Campland would not be demolished, no new low-cost visitor guest accommodations would be constructed, and no enhancement or restoration activities would occur. However, the No Project/No Build Alternative would result in greater operational GHG emissions associated with vehicle trips, solid waste, water supply and wastewater, and energy sources due to the increased density of development and customer base compared to the proposed project. Additionally, there would be no benefit of carbon sequestration from the additional wetland habitat proposed in the project. The No Project/No Build Alternative would not further the strategy goals of the City's CAP. Specifically, the No Project/No Build Alternative would not support Strategy 5, Resilient Infrastructure and Healthy Ecosystems, and would not support the conservation of natural habitats facing sea level risk, as no wetland habitat restoration would occur. Furthermore, the No Project/No Build Alternative would not improve bicycle and pedestrian connections to improve mobility and reduce the use of fossil fuels. Therefore, the No Project/No Build Alternative would result in greater operational GHG emissions compared to the proposed project.

e. Hazards and Hazardous Materials

Similar to the proposed project, the No Project/No Build alternative would not introduce land uses that would result in hazardous emissions or the exposure of schools to hazardous materials, substances, or waste. Under the No Project/No Build Alternative, Campland would not be demolished, and no enhanced wetland restoration would occur. Therefore, the No Project/No Build Alternative would not encounter contaminated soils during grading and excavation, which could result in adverse hazards and hazardous materials impacts. Therefore, the No Project/No Build Alternative would result in reduced hazards and hazardous materials impacts compared to the proposed project.

f. Historical, Archaeological, and Tribal Cultural Resources

Under the No Project/No Build Alternative, Campland would not be demolished, and no enhanced wetland restoration would occur. The No Project/No Build Alternative would not result in the alteration of a historic building, structure, object, or site. In addition, this alternative would not result in ground disturbance that could result in impacts to subsurface archaeological resources or TCRs. Therefore, the No Project/No Build Alternative would not result in significant and unavoidable impacts to historical, archaeological, and TCRs. Under this alternative, there would be no impacts compared to the proposed project.

g. Hydrology/Water Quality

Under the No Project/No Build Alternative, Campland would not be demolished, and no enhanced wetland restoration would occur. The No Project/No Build Alternative would result in more impervious surfaces compared to the proposed project which could increase long-term operational pollutants

and flooding. The proposed wetland enhancements and the nature-based shorelines proposed for Rose Creek under the proposed project would improve water quality by reducing stormwater contamination, including debris and sediment, from reaching Mission Bay. Therefore, the No Project/No Build alternative would result in greater hydrology and water quality impacts compared to the proposed project.

h. Noise

The No Project/No Build Alternative would retain the developed areas of Campland, the vacant mobile home park, the RV park, and the Boat and Ski Club in their current locations. The proposed project would relocate these uses away from nearby noise-sensitive receptors, which would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses. Meanwhile, the No Project/No Build Alternative would result in increased vehicular noise due to greater operational activity, higher density development and a larger customer base compared to the proposed project. Therefore, the No Build/No Project Alternative would result in greater noise impacts compared to the proposed project.

i. Paleontological Resources

The No Project/No Build Alternative would not involve construction-related grading or earth disturbing activities. Therefore, this alternative would not impact high sensitivity geologic formations or fossil recovery sites and would not result in a significant impact to sensitive paleontological resources. The No Project/No Build Alternative would result in no impacts to paleontological resources compared to the proposed project.

j. Transportation and Circulation

Compared to the proposed project, the No Project/No Build Alternative would retain the developed areas of Campland, the vacant mobile home park, the RV park, and the Boat and Ski Club, which would result in greater operational activity, higher development density, and a larger customer base compared to the proposed project and would result in an increase in the overall vehicle trips compared to the proposed project. In addition, the No Project/No Build Alternative would not include a multi-use bike path that would allow for pedestrians and cyclists to connect with points to the west, north, and east, and, therefore, would not further the goals and policies of the City's General Plan Mobility Element, City's Complete Communities: Mobility Choice (Mobility Choices Program), and SANDAG's 2021 Regional Plan to the same extent as the proposed project. The No Project/No Build Alternative would generate an increase in overall trips but have the same average trip distance, resulting in an increased average VMT compared to the proposed project. Furthermore, similar to the proposed project, the No Project/No Build Alternative would not result in an increase in hazards due to a design feature or incompatible uses or impair or interfere with emergency access. Therefore, the No Project/No Build alternative would result in greater transportation and circulation impacts compared to the proposed project.

8.3.1.3 Relationship to Project Objectives

Existing bike and pedestrian pathways would remain under the No Project/No Build Alternative. However, these existing pathways would not further public access, connectivity, and activation of the

shoreline to the extent that installing new multi-use pathways would, as proposed in the project. Therefore, the No Project/No Build Alternative would conflict with project objective 6, which encourages enhancing public access and connectivity within De Anza Cove and increasing connections to the surrounding communities, including opportunities for multimodal travel. The No Project/No Build Alternative would conflict with project objective 3 as it would not incorporate wetland enhancements activities that incorporate climate adaptation strategies to increase resilience to climate change and mitigate potential sea level rise. In addition, the No Project/No Build Alternative would not restore and safeguard natural habitats within De Anza Cove (project objective 4). The No Project/No Build Alternative would not meet project objective 1 because the existing condition does not provide equitable access to De Anza Cove and the coastal landscape for all San Diegans because the project area does not connect to existing bicycle paths or transit connections. The No Project/No Build Alternative would partially meet project objective 2 because local tribes would be welcomed to access the shores of De Anza Cove as they have done for generations. However, the No Project/No Build Alternative would not provide an Interpretive Nature Center where the Iipay-Tipay Kumeyaay stories and traditions could be shared.

8.3.2 Wetlands Optimized Alternative

8.3.2.1 Description

The analysis of the Wetlands Optimized Alternative is provided at an equal level of detail with the proposed project in accordance with the City's awarded Supplemental Environment Project (SEP) grant. The SEP grant was awarded by the San Diego Regional Water Quality Control Board (RWQCB) in 2021 and promotes the restoration of aquatic ecosystems in accordance with Tentative Resolution No. R9-2015-0041 to further recovery of streams, wetlands, and riparian systems in accordance with the RWQCB's Practical Vision. This SEP funded this alternative's preparation and the additional environmental review and consideration of the Wetlands Optimized Alternative.

The Wetlands Optimized Alternative would increase the acres of wetlands and associated transitional zones and uplands to be created and restored in Northeastern Mission Bay, converting the southern portion of the De Anza "boot" and open water areas of De Anza Cove to wetlands. The Wetlands Optimized Alternative would maximize implementable wetland restoration generally reflective of existing feasibility studies for Mission Bay and would provide diverse beneficial uses, such as active recreation, regional parklands, open beach, low-cost visitor guest accommodations, boat facilities/clubhouse, uplands, multi-use paths, wetlands, and an Interpretive Nature Center (see Figure 8-1, Wetlands Optimized Alternative).

The Wetlands Optimized Alternative identifies ways to balance providing public recreation and the sustainable management of environmental resources. Similar to the proposed project, the Wetlands Optimized Alternative would include a combination of habitat restoration, active recreation, low-cost visitor accommodations, open beach and regional parkland and would modify the open water portions of De Anza Cove. Table 8-1, Comparison of Wetlands Optimized Alternative to the Proposed Project, compares the land uses and acreages of this alternative to the proposed project.

The Wetlands Optimized Alternative would include enhancement and restoration within the existing KFMR/NWP, expansion of wetlands currently occupied by Campland, and expanded marshland and habitat in the Rose Creek and De Anza Cove areas. This alternative would provide approximately 250.9

acres of expanded marshland habitat that includes approximately 31.1 acres at the former Campland and approximately 133 acres of other new wetlands. The expanded marshland/habitat area would be composed of high, mid, and low salt marsh areas, mudflats, and subtidal areas, creating a natural interface with De Anza Cove and enhancing water quality in the bay.

In addition, the Wetlands Optimized Alternative would increase upland habitat and buffer areas to approximately 46.1 acres compared to approximately 37.4 acres under the proposed project. Similar to the proposed project, the upland habitat and buffer areas would accommodate a multi-use path with educational signage and mounded landforms featuring native coastal sage, dune, and other native plants. Within this area, passive recreation amenities such as overlooks, pathways, picnic areas, and interpretive signs could be accommodated. The upland plantings would serve as a buffer to the wetland habitat.

Similar to the proposed project, the Wetlands Optimized Alternative would incorporate a range of recreational uses, with compatible user groups that would share the lighted sports fields. Many existing recreational opportunities would be retained. Similar to the proposed project, the current site of the Mission Bay Boat and Ski Club would be replaced with a widened Rose Creek inlet, wetlands and buffers adjacent to the creek. However, overall the Wetlands Optimized Alternative would reduce the amount of active recreational activities to approximately 49.9 acres compared to approximately 60.1 acres under the proposed project.

The Wetlands Optimized Alternative would increase regional parkland to approximately 30.8 acres. The increased regional parkland would provide additional areas to support activities such as picnicking, kite flying, Frisbee games, informal sports, walking, jogging, kids' play, bicycling, and skating compared to the proposed project. However, only approximately 2.3 acres of sandy beach would be provided at the northern edges of De Anza Cove adjacent to the low-cost visitor guest accommodation and boating uses. Similarly, the Wetlands Optimized Alternative would provide access to multi-use paths which would allow for pedestrians and cyclists to connect with points west, north and east. The multi-use path would allow users to view the marshes and have distant views of Mission Bay.

Finally, the Wetlands Optimized Alternative would allocate approximately 27.4 acres of low-cost visitor guest accommodations on the east side of Rose Creek, buffered by upland vegetation, for RVs, cabins, or other eco-friendly accommodations and associated open space and facilities consistent with camping accommodations. The De Anza "boot" would be fully restored with expanded marshland, wetland and upland habitat.

Surface parking areas would be provided similar to the proposed project. Parking would be located in conjunction with the athletic areas and within the footprint of the low-cost visitor guest accommodation area. Additionally, surface parking lots accessible from North Mission Bay Drive would be provided to serve the proposed leases, athletic areas, and the regional parkland areas at De Anza Cove. Parking lots associated with the athletics/aquatics area would be accessible from both North Mission Bay Drive and Grand Avenue.

Similar to the proposed project, vehicular access to the project area would be provided from Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor accommodation, regional parkland, boating, and active

recreation. Watercraft access would be provided at the eastern end of De Anza Cove at the proposed boat rental facility. The existing boat ramp at the western end of De Anza Cove would be removed.

Similar to the proposed project, the Wetlands Optimized Alternative is a plan amendment to the MBPMP and proposes no specific development. General Development Plans would be developed over time and provide precise engineering and construction plans for the recreational elements of this alternative.

Under the Wetlands Optimized Alternative, proposed habitat area improvements would convert the existing Campland property to natural habitat area, as anticipated in the MBPMP. This would involve the demolition of the developed area within Campland, including structures, pavement and utilities, and demolition of the adjacent boat docks to the south. It would also involve the backfill of portions of the bay located south of the proposed marsh and southwest of the proposed low-cost visitor guest accommodation area. The De Anza "boot" would also be fully restored, including the demolition of the existing developed areas. Cut and fill would be balanced on site.

Table 8-1. Comparison of Wetlands Optimized Alternative to the Proposed Project

Land Use	Wetlands Optimized Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	164.1[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	46.1	37.4
Low-Cost Visitor Guest Accommodations	27.4	48.5
Regional Parkland	30.8	26.3
Boat Facilities/Clubhouse	2.9	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	1.2	2.1
Active Recreation	49.9	60.1
Open Water	93	95.9
Open Beach	2.3	5.5
Road[4]	1.9	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes 31.1 acres currently occupied by Campland and 133 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future GDP.

[3] Potential Water Lease areas on the plan are diagrammatic. The intent is not to overlap with Open Beach.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor accommodations, regional parkland, and active recreation, subject to future design.

8.3.2.2 Analysis of Wetlands Optimized Alternative

a. Land Use

Issue 1: Conflicts with Applicable Plans

General Plan

The City's General Plan designates the project area as Parks, Open Space, and Recreation (City of San Diego 2008). Similar to the proposed project, the Wetlands Optimized Alternative would be an amendment to the MBPMP, which serves as the LCP Land Use Plan for Mission Bay Park. The project is consistent with the project area's current General Plan land use category: Parks, Open Space, and Recreation. In addition, this alternative proposes land uses similar to existing uses within the project area, which would not result in a conflict regarding noise-compatible land uses.

Similar to the proposed project, the Wetlands Optimized Alternative would include improvements aimed at safeguarding the viability of marsh areas within its vicinity, conserving and enhancing the project's wetland and upland habitats for the benefit of both wildlife and people, and enhancing the public use of this area of the project (Interpretive Nature Center, boat facilities, low-cost visitor guest accommodations, active recreation space, regional parklands, multi-use trails) consistent with the City's General Plan's goal of preservation and enhancement of coastal resources. The Wetlands Optimized Alternative would allow for equal access to parkland and recreational facilities and would provide improved pedestrian and bicycle connections to the surrounding community through the incorporation of multi-use pathways in support of the City's General Plan goals to provide equal access to public facilities and infrastructure for all community residents; to create a safe and comfortable pedestrian environment; to provide an interconnected street system that provides multiple linkages within and between communities; to expand travel options and improved personal mobility; and to promote environmental quality, public health, recreation, and mobility benefits through increased bicycling. The Wetlands Optimized Alternative would increase wetland habitat restoration and encourage tree preservation along streets in support of the City's General Plan goal to protect and expand green spaces by decreasing the developed land in the project area and restoring the developed land with active recreation, regional parkland, open beach, and wetland land use. Therefore, the Wetlands Optimized Alternative would not conflict with the goals, objectives, or guidelines of the City's General Plan, and impacts would be less than significant, similar to the proposed project.

Mission Bay Park Master Plan

Similar to the proposed project, the Wetlands Optimized Alternative would meet the overall intent of the De Anza Cove area as it is currently envisioned in the MBPMP. The alternative would include amendments to refine the uses specific to the project area, allow for future athletic fields, retain regional parkland, add a potential water quality feature, add future lease opportunities for boat facilities, include upland/developed areas, and plan for expanded marshland/habitat. The Wetlands Optimized Alternative would similarly demolish Campland and implement wetland enhancement and restoration in City-owned portions of the existing KFMR/NWP, the area currently occupied by Campland, and the eastern side of Rose Creek. It would also convert the southern portion of the developed De Anza "boot" area and the open water portion of De Anza Cove to wetlands. The

Wetlands Optimized Alternative would allow for a total of approximately 250.9 acres of expanded wetland habitat, approximately 86.8 acres of which would be located within the KFMR/NWP. Thus, the Wetlands Optimized Alternative would be consistent with MBPMP, and impacts would be less than significant, similar to the proposed project.

Land Development Code Regulations

The Wetlands Optimized Alternative proposes similar construction, enhancement, and hydrologic restoration in the same development footprint as the proposed project. Like the proposed project, the Wetlands Optimized Alternative development components are subject to the same LDC regulations. Compared to the proposed project, the Wetlands Optimized Alternative would create additional approximately 32.1 acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Bay Cove open water areas to more wetlands compared to the proposed project. With regard to the ESL regulations, the proposed restoration/creation activities would be a compatible use within Coastal Overlay Zone (COZ) wetland buffers (i.e., restoration) in accordance with the allowed uses listed in Section 143.0130, Uses Allowed Within Environmentally Sensitive Lands, of the City's LDC. Similar to the proposed project, implementation of the Wetlands Optimized Alternative and Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would comply with the City's Biology Guidelines for the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources. The Wetlands Optimized Alternative would comply with Historical Resources regulations (Section 143.0213[a] of the LDC) and would not result in a conflict with the LDC. Impacts would be less than significant compared to the proposed project.

San Diego Association of Governments 2021 Regional Plan

SANDAG's Regional 2021 Plan includes five key strategies for mobility, also known as the Five Big Moves. The strategies are designed to promote the increased use of zero-emission vehicles and to encourage people to walk, ride bikes, and pursue other forms of active transportation. Safe and convenient places to park, as well as charging stations for electric vehicles, e-bikes, scooters, and other electric rideables, would be offered, along with incentives to purchase those vehicles (SANDAG 2021). Similar to the proposed project, the Wetlands Optimized Alternative recommends improvements to existing parkland, including reconfiguration and improvements to recreational areas, restoration of habitat and creation of new habitat. The Wetlands Optimized Alternative would also reduce the amount of acreage proposed for low-cost visitor guest accommodation, which would further decrease vehicle trips compared to the proposed project.

In addition, the Wetlands Optimized Alternative would include improved active transportation connections for pedestrian and bicycle facilities through the provision of multi-use pathways connecting to off-site transportation facilities. Improved accessibility would allow for increased use of the area by nearby existing residents and reduced VMT. In addition, the Mid-Coast Trolley, which consists of the Metropolitan Transit System (MTS) Blue Line Trolley line extension from Downtown San Diego to the University community, is located east of the project area. The Balboa Avenue Station, located approximately 0.25 mile northeast of the project area, and the Clairemont Drive Station, located approximately 0.75 mile southeast of the project area, provides region-serving high-quality light-rail transit to the project area. Therefore, the Wetlands Optimized Alternative would not conflict

with the goals and objectives of the 2021 Regional Plan. Impacts would be less than significant, similar to the proposed project.

Climate Action Plan

Similar to the proposed project, the Wetlands Optimized Alternative proposes land uses consistent with the MBPMP and underlying zoning, including natural areas, active recreation, and low-cost visitor guest accommodations.

As with the proposed project, in accordance with City guidance for CAP consistency (City of San Diego 2022a), this alternative would be consistent with the City's CAP if it would be consistent with Policies LU-A.7, ME-B.9, CEJ.2, and CE-J.3 from the City's General Plan and all six strategies from the CAP. Consistency with these policies and strategies is evaluated in Table 8-2, General Plan and Climate Action Plan Consistency – Wetlands Optimized Alternative.

Table 8-2. General Plan and Climate Action Plan Consistency – Wetlands Optimized Alternative

Policy or Strategy	Project Consistency
General Plan	
LU-A.7: Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. a. Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; community character and preferences; and balanced community goals (see also Section H). b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community. c. Evaluate the quality of existing and planned transit service.	The Wetlands Optimized Alternative would reduce the density of development in the project area to increase habitat restoration. The project land uses and development intensity are consistent with the surrounding area within Mission Bay Park. The project would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on the site to the surrounding community. Regarding transit services, the project does not propose new transit connections but, instead, is served by existing transit in the area. The Wetlands Optimized Alternative would be consistent with this policy.
ME-B.9: Make transit planning an integral component of long range planning documents and the development review process. a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process. b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance	The Wetlands Optimized Alternative is not a community plan but an amendment to a Master Plan that does not propose new residential or commercial development that should consider development intensity and transit proximity. The Wetlands Optimized Alternative proposes public recreation uses in a regional park that would replace similar existing uses. Overall development would be reduced under the project compared to the existing baseline condition to increase habitat restoration. The project has been designed for walkability and would provide improved pedestrian and bicycle connections to

Table 8-2. General Plan and Climate Action Plan Consistency – Wetlands Optimized Alternative	
Policy or Strategy	**Project Consistency**
with Land Use and Community Planning Element, Sections A and C. c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process. d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access. e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment. f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.	the surrounding community. The Wetlands Optimized Alternative would be consistent with this policy.
CE-J.2: Include community street tree master plans in community plans. a. Prioritize community streets for street tree programs. b. Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form. c. Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.	The Wetlands Optimized Alternative would increase wetland habitat restoration and encourage tree preservation along streets, where feasible, in accordance with the CAP Consistency Regulations. It would support the City's goal to protect and expand green spaces by decreasing the developed land in the project area and restoring the developed land with active recreation, regional parkland, open beach, and wetland land use. The Wetlands Optimized Alternative would be consistent with this policy.
CE-J.3: Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.	The Wetlands Optimized Alternative is not a community plan update. As discussed in Policy CE-J.2, the Wetlands Optimized Alternative would not impact trees. Therefore, the Wetlands Optimized Alternative would be consistent with this policy.
2022 Climate Action Plan	
Strategy 1: Decarbonization of the Built Environment.	The Wetlands Optimized Alternative would not include any components that would conflict with the achievement of the decarbonization of the built environment. The project would provide low-cost visitor guest accommodations, recreational opportunities, and habitat restoration. Proposed development would replace existing similar land uses at a reduced density to increase habitat restoration. The Wetlands Optimized Alternative would support goals to reduce the use of fossil fuels by providing electric vehicle infrastructure to the extent required and improved pedestrian and bicycle facilities and connections to the surrounding community. The Wetlands Optimized Alternative would be consistent with this strategy.

Table 8-2. General Plan and Climate Action Plan Consistency – Wetlands Optimized Alternative	
Policy or Strategy	**Project Consistency**
Strategy 2: Access to Clean & Renewable Energy.	The Wetlands Optimized Alternative would not include any components that would conflict with the achievement of a goal of 100% renewable energy. The alternative is anticipated to reduce energy demand compared to the existing baseline condition due to reduced development density allowing for increased habitat restoration. The alternative would comply with all applicable energy standards for new low-cost visitor guest accommodations and recreational facilities. The Wetlands Optimized Alternative would be consistent with this strategy.
Strategy 3: Mobility & Land Use.	The Wetlands Optimized Alternative would further the goals of Strategy 3 by improving bicycle and pedestrian connections with the proposed recreational facilities and surrounding community. The Wetlands Optimized Alternative would be consistent with this strategy.
Strategy 4: Circular Economy & Clean Communities.	Construction of the Wetlands Optimized Alternative would comply with the City's Construction and Demolition Debris Diversion Ordinance, as applicable. The project area would result in decreased development density compared to the existing baseline condition to increase wetland habitat restoration; therefore, project operations would decrease solid waste production. The Wetlands Optimized Alternative would be consistent with this strategy.
Strategy 5: Resilient Infrastructure and Healthy Ecosystems.	The Wetlands Optimized Alternative would further the City's climate resiliency goals related to healthy ecosystems by increasing wetland habitat restoration. The conversion of currently developed land to restored habitat would support the conservation of natural habitats facing sea level risk. Additionally, future site-specific development would need to demonstrate consistency with the City's CAP regulations regarding street trees and urban forestry. The Wetlands Optimized Alternative would be consistent with this strategy.
Strategy 6: Emerging Climate Action.	The Wetlands Optimized Alternative would support identified actions in Strategy 6 related to carbon sequestration, specifically wetland habitat restoration. As the restored wetland matures, it would increase its carbon sequestration ability. Therefore, the Wetlands Optimized Alternative would be consistent with this strategy.

Source: City of San Diego 2022a.

As shown in Table 8-2, this alternative would be consistent with all applicable General Plan and CAP policies and strategies. The Wetlands Optimized Alternative would particularly support implementation of Strategy 5, Resilient Infrastructure and Healthy Ecosystems (City of San Diego 2022b), because it would expand and restore wetlands throughout the De Anza Cove area. The Wetlands Optimized Alternative would also support Strategy 3, Mobility and Land Use, because it would enhance safety and opportunities for sustainable, multimodal travel, including pedestrian and bicyclist connectivity to, from, and throughout the project area, which would increase connections to surrounding communities and the region through multi-use pathways. The Mid-Coast Trolley, located east of the project area, consists of the MTS Blue Line Trolley from Downtown San Diego to the University Community Plan area. The Balboa Avenue Station, located approximately 0.25 mile northeast of the project area, and the Clairemont Drive Station, located approximately 0.75 mile southeast of the project area, would provide regional-serving light-rail transit to the alternative area.

Class I multi-use path facilities are provided within certain areas of De Anza Cove, as well as within Mission Bay Park, and are supplemented by Class II bike lanes along Grand Avenue and Class III bike routes along North Mission Bay Drive. Similar to the proposed project, the Wetlands Optimized Alternative would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities. The proposed multimodal facilities would support the MBPMP policies and goals to make biking more comfortable and accessible by providing better-quality bicycle facilities.

The Wetlands Optimized Alternative be consistent with CAP land use and mobility strategies. The project would not conflict with the City's CAP; therefore, impacts would be less than significant, similar to the proposed project.

Climate Resilient SD Plan

The Wetlands Optimized Alternative supports the plan goals and policies related to protecting natural environments. Specifically, the proposed habitat restoration under the Wetlands Optimized Alternative implements Thriving Natural Environments policies, such as Policy TNE-1, which includes supporting ecosystem and watershed function to increase the capacity of the system to withstand stress from climate change, and Policy TNE-2, which includes expansion of natural features, including wetlands. In the Climate Resilient SD Plan, wetlands are identified as an important habitat to mitigate flooding, improve water quality, provide important habitat, absorb wave energy, and minimize coastal erosion. Therefore, the Wetlands Optimized Alternative would be consistent with the Climate Resilient SD Plan. Impacts would be less than significant, similar to the proposed project.

California Coastal Act

The CCA requires projects within the COZ to be consistent with standards and policies addressing public access, recreation, marine environment, land resources, development, and industrial development. Similar to the proposed project, the Wetlands Optimized Alternative would include an LCP Land Use Plan that requires approval by the City and certification by the California Coastal Commission. Similar to the proposed project, the Wetlands Optimized Alternative would not conflict with the CCA because the project would provide recreational opportunities and public access to the shoreline and would include some low-cost visitor housing, consistent with the policies of the CCA. Therefore, impacts would be less than significant, similar to the proposed project.

Mission Bay Park Natural Resource Management Plan

Similar to the proposed project, the Wetlands Optimized Alternative seeks to implement the vision of the adopted MBPMP by expanding wetland habitat, including the removal and replacement of Campland with habitat contiguous to the existing KFMR/NWP. The MBPMP EIR (City of San Diego 1994) analyzed compliance with the 1995 Mission Bay Park NRMP. The analysis specifically cites the proposed change in land use related to the demolition of Campland as an example of how the MBPMP maximizes the benefits of habitat areas by placing them in large contiguous sites (City of San Diego 1994). The NRMP also provides for agreements between the City and resource agencies as to the maintenance and responsibilities for regional natural resources such as the California least tern (*Sterna antillarum browni*) and eelgrass. Therefore, the Wetlands Optimized Alternative would not conflict with the Mission Bay Park NRMP, and impacts would be less than significant, similar to the proposed project.

Pacific Beach Community Plan and Local Coastal Program

Similar to the proposed project, the Wetlands Optimized Alternative is located outside the boundary of the Pacific Beach CP/LCP; thus, it would not be subject to the specific policies of this plan. However, due to the adjacency to the plan area, this analysis generally evaluates the consistency with overall themes of applicable goals and policies of the Pacific Beach CP/LCP. The applicable goals of the Circulation Element of the Pacific Beach CP/LCP aim to create safe, pleasant, and useful pedestrian and bicycle pathways to connect the residential neighborhoods of Pacific Beach with commercial areas and community facilities (City of San Diego 2019). Similar to the proposed project, the Wetlands Optimized Alternative would enhance public access, recreational facilities, and pedestrian/bicycle circulation throughout the project area; therefore, it would not conflict with these overall goals of the Pacific Beach CP/LCP.

Compared to the proposed project, the Wetlands Optimized Alternative would retain some active recreation areas, enhance recreational facilities adjacent to Pacific Beach, improve access to the park areas along the bay shoreline for residents and visitors, conserve and enhance the natural amenities of the community such as its open space and topography, preserve significant environmental resource areas, and maintain and expand public views to the KFMR/NWP. Therefore, the Wetlands Optimized Alternative would not conflict with the goals of the Pacific Beach CP/LCP. Impacts would be less than significant, similar to the proposed project.

Balboa Avenue Station Area Specific Plan

Similar to the proposed project, the Wetlands Optimized Alternative is located outside the boundary of the BASASP, and thus, would not be subject to the goals and objectives of the BASASP. However, the BASASP identifies multimodal improvements to increase bicycle, pedestrian, and transit access to the Balboa Avenue Trolley Station, which is located approximately 0.25 mile from the project area. Similar to the proposed project, the Wetlands Optimized Alternative includes improved active transportation connections for pedestrian and bicycle facilities through the inclusion of multi-use pathways for pedestrians and bicyclists that would provide connections to off-site existing facilities. In addition, the Mid-Coast Trolley is located east of the project area and consists of the MTS Blue Line Trolley line extension from Downtown San Diego to the University community. The Balboa Avenue

Station, located approximately 0.25 mile northeast of the project area, would provide region-serving high-quality light-rail transit to the project area. Therefore, the Wetlands Optimized Alternative would not conflict with the goals and objectives of the BASASP. Impacts would be less than significant, similar to the proposed project.

Issue 2: Conversion of Open Space or Farmland

Similar to the proposed project, the Wetlands Optimized Alternative is classified by the California Department of Conservation Farmland Mapping and Monitoring Program map as Urban and Built-Up Land (DOC 2022) and is not designated as Prime Farmland. Furthermore, the Wetlands Optimized Alternative is designated Park, Open Space, and Recreation in the City's General Plan (City of San Diego 2008) and would remain parkland. The current adopted MBPMP recommends relocating Campland because it is incompatible with the environmental objectives of the park and with the goal of restoring the land to a natural habitat area. Compared to the proposed project, the Wetlands Optimized Alternative proposes a greater amount of wetlands and upland habitat to be created and restored. Because the Wetlands Optimized Alternative would result in increased acreage of natural open space consistent with the existing land use designation and goals of the MBPMP, it would not result in conversion of open space to a more intensive land use.

Similarly, proposed improvements are consistent with the overall intent and goals of the project area as prescribed by the MBPMP. The Wetlands Optimized Alternative would keep with existing land uses and would not propose more intensive land uses that would divide a community. Surrounding land uses include Mission Bay to the south, Interstate 5 to the southeast, Mission Bay Senior High School to the northwest, residences and commercial uses to the north and northeast, and residential and commercial uses and Crown Point Park to the west and southwest. The Wetlands Optimized Alternative would be compatible with the existing surrounding land uses. Therefore, no impact would occur, similar to the proposed project.

Issue 3: Conflict with Multiple Species Conservation Program Subarea Plan

Similar to the proposed project, the Wetlands Optimized Alternative covers some Urban Habitat Areas included in the Multi-Habitat Planning Area (MHPA), which are lands managed pursuant to the existing Mission Bay Park NRMP (City of San Diego 1990). According to the City's MSCP SAP, the KFMR/NWP on the western side of the project area is within the MHPA boundary and includes riparian/wetlands and beach/foredunes vegetation communities. The MHPA Guidelines for Urban Habitat Areas stipulate that the management of California least tern areas shall be pursuant to the adopted MBPMP and associated NRMP (City of San Diego 1997).

The Wetlands Optimized Alternative proposes similar construction, enhancement, and hydrologic restoration compared to the proposed project. Like the proposed project, the Wetlands Optimized Alternative would be required to document compliance with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the City's MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, species-specific Area Specific Management Directives (ASMDs) provided in the MSCP SAP Appendix A, and the MSCP SAP General Planning Policies and Design Guidelines. The Wetlands Optimized Alternative would be consistent with the policies and

requirements of the MSCP, including mitigation requirements, and impacts would be less than significant, similar to the proposed project.

Issue 4: Conflicts with an Adopted Airport Land Use Compatibility Plan

Similar to the proposed project, the Wetlands Optimized Alternative is not located within the AIA of the Montgomery-Gibbs Executive Airport or the San Diego International Airport and would not be subject to either ALUCP. Therefore, the Wetlands Optimized Alternative would not result in land uses that are incompatible with an adopted ALUCP. No impact would occur, similar to the proposed project.

b. Air Quality and Odor

Issue 1: Conflict with Air Quality Plan

The San Diego County Air Pollution Control District (SDAPCD) and SANDAG are responsible for developing and implementing the Clean Air Plans for attainment and maintenance of the ambient air quality standards in the San Diego Air Basin; specifically, the SIP and RAQS.[1] If a project involves development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality. Similar to the proposed project, the Wetlands Optimized Alternative would include land uses that are consistent with the MBPMP, including natural areas, active recreation, and low-cost visitor guest accommodations. Therefore, the Wetlands Optimized Alternative is consistent with the existing zoning and underlying Master Plan for the site and would not include any growth-inducing features, such as housing, that would cause an increase in population or traffic. Similar to the proposed project, the Wetlands Optimized Alternative would be consistent with the assumptions in the RAQS and SIP. Therefore, less than significant impacts would occur, similar to the proposed project.

Issue 2: Air Quality Standards

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acreage of wetlands and uplands while reducing the acreages of the active recreation and low-cost visitor guest accommodations.

Compared to the proposed project, the Wetlands Optimized Alternative would result in greater construction emissions during grading compared to the proposed project due to the increase in wetland enhancement construction activities. Construction efforts related to demolition, site preparation, building construction, paving, and coating would be similar to the proposed project. The Wetlands Optimized Alternative would include greater earth movement to expand the wetlands and create the mounded landforms, particularly in the De Anza "boot" and open water areas of De Anza Cove. The Wetlands Optimized Alternative would result in approximately 10 percent greater habitat enhancement compared to the proposed project; therefore, it is assumed that daily grading emissions would also increase by approximately 10 percent to reflect an incremental increase in grading

[1] For the purpose of this discussion, the relevant federal air quality plan is the Ozone Maintenance Plan (SDAPCD 2020). The RAQS is the applicable plan for purposes of state air quality planning. Both plans reflect growth projections in the San Diego Air Basin.

intensity. Estimated emissions are provided in Table 8-3, Estimated Maximum Daily Grading Emissions for the Wetlands Optimized Alternative. Similar to the proposed project, the Wetlands Optimized Alternative would be required to comply with SDAPCD Rule 55, Fugitive Dust Control and Rule 67.0.1, Architectural Coatings and the City Municipal Code, Chapter 14, Article 2, Division 7. Although construction emissions under the alternative would be greater than the proposed project, construction emissions would not exceed the SDAPCD air quality thresholds. Impacts would be less than significant, similar to the proposed project.

Table 8-3. Estimated Maximum Daily Grading Emissions for the Wetlands Optimized Alternative

Phase	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
	Pounds per Day					
Grading – Proposed Project	4	29	34	<1	5	2
Grading – Wetlands Optimized Alternative	4.4	32	37	<1	6	2.2
SDAPCD Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Appendix C, Air Quality Technical Memorandum, for project emissions.
Notes: CO = carbon monoxide; NO_x = oxides of nitrogen; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SDAPCD = San Diego County Air Pollution Control District; SO_x = sulfur oxides; VOC = volatile organic compound

Operational emissions from the Wetlands Optimized Alternative would be reduced compared to the proposed project because the alternative would result in less development and there would be an overall reduction in low-cost visitor guest accommodations. Mobile-source emissions would be expected to decrease more than the proposed project due to a decreased customer base for the alternative as a result of the reduction in the low-cost visitor guest accommodations and active recreation uses. Therefore, daily operational emissions would be reduced compared to the proposed project and would not exceed the applicable City thresholds. Impacts would be less than significant, similar to the proposed project.

Issue 3: Substantial Pollutant Concentrations

Carbon Monoxide Hotspots

Traffic generated by the proposed project would be reduced compared to the current baseline condition due to the removal of Campland and reduction in low-cost guest accommodations. Compared to the proposed project, the Wetlands Optimized Alternative would further reduce traffic compared to the existing condition due to less proposed low-cost visitor guest accommodations and active recreation land uses. Therefore, the potential for this alternative to contribute to a CO hotspot is reduced compared to the current baseline condition and the proposed project. The Wetlands Optimized Alterative would result in a less than significant impact to sensitive receptors from exposure to substantial pollutant concentrations with regard to potential CO hotspots, similar to the proposed project.

Toxic Air Contaminants

Similar to the proposed project, operation of the Wetlands Optimized Alternative would not include any stationary sources of toxic air contaminants and would not generate heavy-duty truck trips or other sources of mobile toxic air contaminants, such as diesel particulate matter. The greatest potential for toxic air contaminant emissions would be diesel particulate matter emissions during construction from heavy equipment operations and heavy-duty trucks and the associated health impacts to sensitive receptors. The closest sensitive receptors (at Mission Bay High School and residences north and west of the project area) would be located directly adjacent to the alternative's boundaries. The proposed project's modeled health risk for annual concentration at the maximally exposed individual resident was approximately 0.003, which would not exceed the SDAPCD's significance threshold of 1.0 for noncarcinogenic health impacts. The Wetlands Optimized Alternative would result in an approximately 10 percent increase in truck trips due to additional excavation required to accommodate the enhanced wetland restoration. This incremental increase in truck activity would not result in enough trips to exceed the 1.0 significance threshold and would therefore not cause a potential health risk. Impacts would be less than significant, similar to the proposed project.

Issue 4: Odors

Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the Wetlands Optimized Alternative. However, construction would take place across the project area and would occur adjacent to sensitive receptors only intermittently for short periods. The Wetlands Optimized Alternative would not include any land uses that would produce objectionable odors affecting a substantial number of people. Therefore, impacts from odors would be less than significant, similar to the proposed project.

c. Biological Resources

Issue 1: Sensitive Species

Sensitive Plant Species

Direct Impacts

Compared to the proposed project, the Wetlands Optimized Alternative would create an additional approximately 32.1 acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands than the proposed project. The Wetlands Optimized Alternative would also result in construction, enhancement, and hydrologic restoration activities in the KFMR/NWP. Therefore, potential direct impacts to sensitive plant species observed or with a high potential to occur in the suitable habitat in the KFMR/NWP, including California seablite, Palmer's frankenia, and estuary seablite, would result under the Wetlands Optimized Alternative (see Figure 8-2, Impacts to Biological Resources – Wetlands Optimized Alternative). Therefore, similar to the proposed project, impacts to sensitive plant species would be potentially significant.

Indirect Impacts

Construction activities of the Wetlands Optimized Alternative would also potentially result in indirect impacts to sensitive plant species. The Wetlands Optimized Alternative, like the proposed project, is required to comply with the City's MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and National Pollutant Discharge Elimination System (NPDES) regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D, Biological Resources Technical Report; similar to the proposed project, the Wetlands Optimized Alternative is also consistent with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines as demonstrated in Tables 4 and 5 in Appendix D. In addition, because the Wetlands Optimized Alternative is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, Land Use Adjacency Guidelines (LUAG). The project's consistency with the MHPA LUAG is demonstrated in Table 6 in Appendix D, and the Wetlands Optimized Alternative is also consistent with the MHPA LUAG. Consistency with the MHPA LUAG would ensure minimization of adverse edge effects from implementation of the Wetlands Optimized Alternative. Therefore, similar to the proposed project, indirect impacts to sensitive plant species during construction activities and operation of the Wetlands Optimized Alternative would be less than significant.

Sensitive Wildlife Species

Direct Impacts

Similar to the proposed project, the Wetlands Optimized Alternative would result in similar impacts to suitable habitat for the 27 sensitive wildlife species observed and the two sensitive wildlife species with high potential to occur in the project area. Like the proposed project, the Wetlands Optimized Alternative would conform and be consistent with the City's MSCP SAP and the ASMDs as applicable to the nine sensitive wildlife species covered by the MSCP SAP. Similarly, the Wetlands Optimized Alternative would conform and be consistent with the California Endangered Species Act and avoid impacts to the California Department of Fish and Wildlife (CDFW) fully protected white-tailed kite. Therefore, direct impacts to these MSCP SAP covered and CDFW fully protected species would be less than significant.

Similarly, the Wetlands Optimized Alternative would comply with regulations protecting sensitive nesting birds and raptors, including the California Fish and Game Code and Migratory Bird Treaty Act. Implementation is ensured through conditions of subsequent project-level approval. Due to known presence of federal and state endangered avian species, potential direct impacts to nesting birds and raptors would be potentially significant.

Similar to the proposed project, implementation of the Wetlands Optimized Alternative would result in both permanent and temporary direct loss of habitat for sensitive wildlife species not covered by the MSCP SAP or fully protected under the California Endangered Species Act, including roosting bats. This

alternative would result in similar direct impacts to sensitive wildlife species as identified for the proposed project, and impacts would be potentially significant.

Indirect Impacts

Construction activities of the Wetlands Optimized Alternative would potentially result in indirect impacts to sensitive wildlife species. The Wetlands Optimized Alternative, like the proposed project, would comply with the City's MSCP SAP, the San Diego RWQCB Regional Municipal Separate Storm Sewer System (MS4) Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D; similar to the proposed project, the Wetlands Optimized Alternative is also consistent with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines. In addition, because the Wetlands Optimized Alternative is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAG. Consistency with the MHPA LUAG would ensure minimization of adverse edge effects from implementation of the Wetlands Optimized Alternative. The project's consistency with the MHPA LUAG is demonstrated in Table 6 in Appendix D, and the Wetlands Optimized Alternative is also consistent with the MHPA LUAG. Therefore, indirect impacts to sensitive wildlife species during construction activities and operation of the Wetlands Optimized Alternative would be less than significant.

Similar to the proposed project, under the Wetlands Optimized Alternative implementation of Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would reduce impacts to sensitive species to a less than significant level.

Issue 2: Sensitive Vegetation Communities

Direct Impacts

Compared to the proposed project, the Wetlands Optimized Alternative would create approximately 32.1 additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands than the proposed project. The Wetlands Optimized Alternative includes construction, enhancement, and hydrologic restoration activities. Although the Wetlands Optimized Alternative would result in increased natural area compared to the proposed project, this alternative would not change the potential direct impacts to sensitive vegetation communities during construction because ground-disturbing activities would modify the current habitat, and impacts would be potentially significant.

Indirect Impacts

Construction activities of the Wetlands Optimized Alternative would potentially result in indirect impacts to sensitive vegetation communities. The Wetlands Optimized Alternative, like the proposed

project, is required to comply with the City's MSCP SAP, the San Diego RWQCB Regional MS4 Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D, and the Wetlands Optimized Alternative is also consistent with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines. In addition, because the Wetlands Optimized Alternative is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MHPA LUAGs. The project's consistency with the MHPA LUAGs is demonstrated in Table 6 in Appendix D, and the Wetlands Optimized Alternative is also consistent with the MHPA LUAGs. Consistency with the LUAGs would ensure minimization of adverse edge effects and avoidance of sensitive habitats from implementation of the Wetlands Optimized Alternative, resulting in less than significant impacts. Therefore, indirect impacts to sensitive vegetation communities during construction activities and operation of the Wetlands Optimized Alternative would be less than significant.

Similar to the proposed project, implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would mitigate potential direct impacts to sensitive vegetation communities from development of the Wetlands Optimized Alternative to below a level of significance.

Issue 3: Jurisdictional Aquatic Resources

Compared to the proposed project, the Wetlands Optimized Alternative would create approximately 32.1 additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands than the proposed project. This alternative would remove developed land in the De Anza "boot" area in exchange for additional jurisdictional aquatic resources, including wetland and non-wetland waters (see Figure 8-3, Impacts to Potentially Jurisdictional Aquatic Resources – Wetlands Optimized Alternative). Although the Wetlands Optimized Alternative would result in increased jurisdictional aquatic resources compared to the proposed project, this alternative, like the proposed project, would be considered a compatible use within COZ wetland buffers (i.e., restoration), in accordance with the allowed uses listed in Section 143.0130 of the City's LDC, ESL regulations. In addition, like the proposed project, the Wetlands Optimized Alternative would be designed to minimize the extent of construction activities within and adjacent to wetlands, including the number of access routes and the size of staging areas. As a result, impacts to wetland buffers would be minimized to the maximum extent practicable and would be considered less than significant. Further, the Wetlands Optimized Alternative would be required to obtain regulatory permits from USACE, RWQCB, and CDFW and provide compensatory mitigation for impacts prior to the start of construction for subsequent projects that are implemented under the proposed project to ensure that no net loss of resources would occur. Therefore, direct impacts to jurisdictional aquatic resources would be potentially significant.

Similar to the proposed project, implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would mitigate potential direct impacts to jurisdictional aquatic resources from development of the Wetlands Optimized Alternative to a less than significant level.

Indirect Impacts

Construction activities of the Wetlands Optimized Alternative would also potentially result in indirect impacts to jurisdictional aquatic resources. The Wetlands Optimized Alternative, like the proposed project, is required to comply with the City's MSCP SAP, the San Diego RWQCB Regional MS4 Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D; the Wetlands Optimized Alternative is similarly consistent with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines. In addition, because the Wetlands Optimized Alternative is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAG. Consistency with the LUAG would ensure minimization of adverse edge effects from implementation of the Wetlands Optimized Alternative. Therefore, indirect impacts to jurisdictional aquatic resources during construction activities and operation of the Wetlands Optimized Alternative would be less than significant, similar to the proposed project.

Issue 4: Wildlife Corridors and Habitat Linkages

Direct Impacts

Compared to the proposed project, the Wetlands Optimized Alternative would create approximately 32.1 additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands compared to the proposed project. The Wetlands Optimized Alternative would remove approximately 30.7 acres of developed land in exchange for additional wetlands and transitional uplands. The Wetlands Optimized Alternative would result in increased natural areas, potentially expanding the wildlife movement corridors and habitat connectivity in the area compared to the proposed project. This alternative would not have a significant impact on habitat linkages because the overall habitat of the existing corridors would expand as a result of the alternative. Therefore, impacts to wildlife corridors and habitat connectivity would be less than significant, similar to the proposed project.

Indirect Impacts

Construction activities and operation of the Wetlands Optimized Alternative would potentially result in indirect impacts to wildlife movement corridors. The Wetlands Optimized Alternative, like the proposed project, is required to comply with the City's MSCP SAP, the San Diego RWQCB Regional MS4 Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations through implementation of site design, source control, and incorporation of construction and permanent BMPs. The proposed project's consistency with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines is demonstrated in Tables 4 and 5 in Appendix D; the Wetlands Optimized Alternative is also consistent with the MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design

Guidelines. In addition, because the Wetlands Optimized Alternative is located within and adjacent to the MHPA and could result in potential indirect impacts to the preserve, it would be required to demonstrate consistency with the MSCP SAP Section 1.4.3, LUAG. Consistency with the LUAG would ensure minimization of adverse edge effects from implementation of the Wetlands Optimized Alternative by addressing issues of drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading/development. Therefore, similar to the proposed project, indirect impacts to wildlife movement corridors and habitat connectivity during construction activities and operation of the Wetlands Optimized Alternative would be less than significant.

Issue 5: Habitat Conservation Plans

Like the proposed project, the Wetlands Optimized Alternative would be subject to the City's MSCP SAP General Management Directives, species-specific ASMDs, and General Planning Policies and Design Guidelines. The Wetlands Optimized Alternative would be required to document compliance with the General Planning Policies and Design Guidelines provided in Section 1.4.2 of the MSCP SAP, General Management Directives outlined in Section 1.5.2 of the MSCP SAP, and species-specific ASMDs provided in the MSCP SAP Appendix A (City of San Diego 1997). The consistency analysis provided in Tables 4 and 5 in Appendix D are also applicable to this alternative. As demonstrated, this alternative would be consistent with the policies and requirements of the MSCP SAP. Therefore, impacts would be less than significant, similar to the proposed project.

Issue 6: Multi-Habitat Planning Area Adjacency

Like the proposed project, the Wetlands Optimized Alternative would be required to demonstrate consistency with the MHPA LUAG. Similar to the project, the Wetlands Optimized Alternative would be a compatible land use within the MHPA and would follow the General Planning Policies and Design Guidelines outlined in Section 1.4.2 of the City's MSCP SAP. Because a portion of the alternative occurs within the MHPA, the alternative would be required to document compliance with the MHPA LUAGs. The Wetlands Optimized Alternative would comply with the MHPA LUAGs. Therefore, impacts would be less than significant, similar to the proposed project.

Issue 7: Local Policies or Ordinances

Like the proposed project, the Wetlands Optimized Alternative would be required to be consistent with the General Plan Conservation and Recreation Elements. The Wetlands Optimized Alternative would result in similar impacts to sensitive plant and wildlife species and sensitive vegetation communities as the proposed project and would implement similar mitigation measures to reduce those impacts to below a level of significance. Because the Wetlands Optimized Alternative would occur in the same location, result in similar impacts to biological resources, and implement similar mitigation measures as the proposed project, it would not conflict with the City's General Plan Conservation and Recreation Elements, which encourage habitat restoration and conservation and active and passive recreation uses. Impacts would be less than significant, similar to the proposed project.

Issue 8: Invasive Species Introduction

Construction and operation of the Wetlands Optimized Alternative would be similar to the proposed project. Therefore, the Wetlands Optimized Alternative has the same potential to introduce non-native

invasive species of plants into the natural open space areas of KFMR/NWP and Mission Bay as the proposed project. This alternative would comply with City's MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations, and Landscape Regulations (LDC 142.0400 and per Table 142-04F, Revegetation and Irrigation Requirements) requiring all plant species installed within 100 feet of the MHPA be non-invasive. Further, similar to the proposed project, the Wetlands Optimized Alternative would incorporate invasive plant species removal into habitat restoration (Mitigation Measure **MM BIO-5.3-5**). Therefore, impacts would be mitigated to a less than significant level, similar to the proposed project.

d. Greenhouse Gas Emissions

Issue 1: Greenhouse Gas Emissions

As with the proposed project, impacts related to GHG emissions associated with the Wetlands Optimized Alternative have been analyzed through a qualitative analysis of anticipated GHG emissions and consistency with the City's CAP.

GHG emissions would be associated with construction of this alternative through use of construction equipment and vehicle trips. The Wetlands Optimized Alterative would result in greater temporary construction emissions during grading from greater earth movement to expand the wetlands and create the mounded landforms, particularly in the De Anza "boot" and open water areas of De Anza Cove. However, GHG emissions attributable to this alternative at full buildout would be less than the GHG emissions under the existing conditions and the adopted Master Plan due to the deintensification of land uses and associated decrease in developed land. Furthermore, temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections, and thus, were thus accounted for in the CAP.

The Wetlands Optimized Alternative would result in reduced operational GHG emissions due to a reduction in low-cost visitor housing and active recreation land uses resulting in less vehicles to and from the site. This alternative would also be required to comply with the CAP Consistency Regulations, which contain measures that are required to be implemented on a project-by-project basis to ensure that the GHG emissions reduction targets identified in the CAP are achieved. Therefore, compliance with CAP Consistency Regulations upon implementation of this alternative would result in less than significant impacts associated with GHG emissions, and overall GHG emissions from this alternative would be similar to or less than the proposed project.

Issue 2: Conflicts with Plans or Policies

2008 General Plan and 2022 Climate Action Plan

The Wetlands Optimized Alternative, like the proposed project, proposes land uses that would be consistent with the City's General Plan and the City's CAP. Refer to Table 8-2 for a detailed consistency discussion.

The Wetlands Optimized Alternative would particularly support implementation of Strategy 5, Resilient Infrastructure and Healthy Ecosystems, by providing more wetland habitat restoration than the proposed project. As the restored wetland matures, it would increase its carbon sequestration

ability compared to the proposed project. Future projects brought forward with the implementation of this alternative design would comply with all applicable existing and future sustainability regulations adopted to meet the CAP emissions reduction goals. Temporary construction as a result of implementing this alternative would result in emissions that are accounted for in the CAP and would be subject to California regulations that limit construction equipment and vehicle idling and City construction best management practices. Impacts would be less than significant, similar to the proposed project.

Climate Resilient SD Plan

Climate Resilient SD provides strategies to prepare, respond and recover from potential climate change hazards, like extreme heat, wildfires, sea level rise, and flooding and drought, as well as how the proposed investments can improve local communities. Similar to the proposed project, the Wetlands Optimized Alternative supports the plan goals and policies related to protecting natural environments by providing more wetland habitat restoration than the proposed project. The increase in wetlands from this alternative would provide additional climate adaptation and resiliency benefits by adding additional habitat, improve air quality, reduce flooding, and support ecosystem function and healthy watersheds, consistent with the Climate Resilient SD Plan goals and policies. Impacts would be less than significant, similar to the proposed project.

San Diego Association of Governments 2021 Regional Plan

Similar to the proposed project, the Wetlands Optimized Alternative would include design elements that support the policy objectives of the 2021 Regional Plan. This alternative would support the 2021 Regional Plan vision by providing improved pedestrian and bicycle facilities, including off-site connections with the surrounding community, and would make improvements to a currently developed site. This alternative would reduce overall development density on the site, which would decrease vehicle trips compared to the proposed project. This alternative would not include any components that would conflict with implementation of the 2021 Regional Plan and impacts would be less than significant, similar to the proposed project.

California Air Resources Board's Scoping Plan

The 2022 Scoping Plans provide a framework for actions to reduce California's GHG emissions and requires California Air Resources Board (CARB) and other state agencies to adopt regulations and other initiatives to reduce GHGs. The 2022 Scoping Plans are not directly applicable to specific projects. Similar to the proposed project, the Wetlands Optimized Alternative would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law and would therefore be consistent with the Scoping Plan strategies. The Wetlands Optimized Alternative would further reduce development and vehicle trips compared to the proposed project and would be consistent with GHG reduction goals. Additionally, the 2022 Scoping Plan emphasizes the importance of natural and working lands to achieve carbon neutrality. The Wetlands Optimized Alterative would increase wetland habitat restoration compared to the proposed project, which would support this strategy. Therefore, impacts would be less than significant, similar to the proposed project.

e. Hazards and Hazardous Materials

Issue 1: Wildland Fire Risk

Similar to the proposed project, the Wetlands Optimized Alternative is surrounded by development, including commercial, residential, and recreation land uses and includes marine waters of Mission Bay. These land use types do not contain wildland fuel sources likely to burn in the event of a wildfire, which significantly reduces the likelihood of wildfires impacting the project area. The Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands than the proposed project. Similarly, the Wetlands Optimized Alternative design allows for defensible spaces between project components and neighboring buildings and vegetation. According to the San Diego Fire-Rescue Department, defensible space is the area between a structure and wildland that helps slow down or stop fire from spreading; the defensible space between vegetated areas in the Wetlands Optimized Alternative would decrease the spread of wildfires and reduce the risk.

Compared to the proposed project, which proposes 48.5 acres of low-cost visitor guest accommodations, the Wetlands Optimized Alternative proposes 27.4 acres, which could include campgrounds where campfires would be allowed in designated areas. Campfire areas would be limited to developed campgrounds and beach areas and would not be located within heavily vegetated areas, which would reduce the risk of wildland fires. Fires located in beach areas shall be in accordance with San Diego Municipal Code, Sections 63.20.5(c) and (d), which requires the use of City-provided container rings. Campfires would be limited to the designated areas within the low-cost visitor accommodation areas.

The Wetlands Optimized Alternative would comply with local fire emergency protocols and local emergency evacuation and disaster plans in the event of a wildfire or emergency. Impacts related to wildland fire risk would be less than significant, similar to the proposed project.

Issue 2: Hazards Emissions and Materials

Similar to the proposed project, equipment used during grading and construction activities associated with the Wetlands Optimized Alternative could result in incidental spills of petroleum products and hazardous substances. Spills would be contained on site in accordance with a required Stormwater Pollution Prevention Plan (SWPPP). As such, the adjacent Mission Bay Senior High School would not be affected by such incidental releases. Similarly, the Wetlands Optimized Alternative would not introduce any land uses, such as industrial, that could result in hazardous emissions or exposure of schools to hazardous materials.

Similar to the proposed project, no schools or open hazardous materials sites are located within the Wetlands Optimized Alternative project area (see Issue 4, Hazardous Materials Sites). Therefore, impacts to schools from hazardous materials, substances, or waste associated with this alternative would be less than significant, similar to the proposed project.

Issue 3: Emergency Plan Contingency

The Wetlands Optimized Alternative land uses would use Interstate 5 to access the project area, similar to the existing uses on site. The designated use of Interstate 5 would be consistent with San Diego Municipal Code standards for emergency vehicle access, and no components would impair the implementation of or compliance with an adopted evacuation plan. The Wetlands Optimized Alternative would not alter existing transportation facilities that have been identified as emergency routes, or have been otherwise identified for use during an emergency, or existing emergency plan routes. The Wetlands Optimized Alternative land uses would bring visitors to the project area for short periods, similar to the proposed project. Visitors would arrive on foot or by bicycle, passenger vehicle, or public transportation. Visitors would be required to leave the project area during an emergency evacuation event. Similar to the proposed project, the Wetlands Optimized Alternative would comply with the County Emergency Operations Plan and would not interfere with a response to disaster situations, including impairment of Interstate 5 in an emergency. Therefore, under this alternative, impacts related to impairment of an adopted emergency response plan or evacuation plan would be less than significant, similar to the proposed project.

Issue 4: Hazardous Materials Sites

Compared to the proposed project, the Wetlands Optimized Alternative differs from the proposed project in creating additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to more wetlands.

Construction

Similar to the proposed project, construction equipment used to implement the Wetlands Optimized Alternative would have the potential to release oils, greases, solvents, and other finishing materials through accidental spills. Spill or upset of these materials could impact surrounding land uses; however, federal, state, and local controls have been enacted to reduce the effects of such potential hazardous materials spills. Compliance with these requirements is mandatory and would minimize the potential for the accidental release or upset of hazardous materials, thus ensuring public safety.

The Wetlands Optimized Alternative proposes construction, enhancement, and hydrologic restoration in the same development footprint as the proposed project, and would implement similar measures to address contaminated soils, polychlorinated biphenyl, and other hazardous materials (see Section 5.5.3.4 for more details). The Wetlands Optimized Alternative would be required to follow all applicable local, state, and federal regulations regarding the discovery, response, disposal, and remediation of hazardous materials encountered during the construction process. Any contaminated soil shall be removed and disposed in accordance with requirements by the San Diego County Department of Environmental Health Hazardous Materials Division, which is the local Certified Unified Program Agency regarding investigation and cleanup of contaminated sites. As a result of existing conditions, such as documented tank leaks, possible polychlorinated biphenyl spills, and presence of a waste collection/storage area on site, construction impacts associated with potentially encountering contaminated soil during grading and excavation would be potentially significant. Implementation of

Mitigation Measures **MM HAZ 5.5-1** through **MM HAZ 5.5-4** would reduce impacts to a less than significant level, similar to the proposed project.

Operation

Similar to the proposed project, operation of the Wetlands Optimized Alternative would involve limited use of potentially hazardous materials typical of recreational uses, including cleaning fluids, detergents, solvents, adhesives, sealers, paints, fuels/lubricants, and fertilizers and/or pesticides for landscaping. These materials would be contained, stored, and used on site in accordance with manufacturers' instructions, applicable standards, and federal, state, and local regulations. Compliance with applicable regulations would serve to protect against a significant and irreversible environmental change that could result from the accidental release of hazardous materials. Therefore, operation-related activities would not create a significant hazard to the public or environment. Impacts would be less than significant, similar to the proposed project.

Issue 5: Aircraft Related Hazards

Similar to the proposed project, the Wetlands Optimized Alternative is not subject to the Montgomery-Gibbs Executive Airport or the San Diego International Airport ALUCP (SDCRAA 2014). Additionally, the area does not trigger the notification criteria of the Federal Aviation Administration as defined by the Code of Federal Regulations, Title 14, Part 77 (see Section 5.5, Hazards and Hazardous Materials, of this PEIR for further detail), unless the Federal Aviation Administration chooses to request notification.

Similar to the proposed project, campfire areas would be limited to developed campgrounds and beach areas and would not be within heavily vegetated areas, which would reduce the risk of wildland fires. Fires allowed in beach areas shall be in accordance with San Diego Municipal Code, Sections 63.20.5(c) and (d), which require the use of City-provided container rings.

Implementation of the Wetlands Optimized Alternative would include the restoration of approximately 250.9 acres of marshland/wetland habitat. This feature of the proposed alternative would create habitat for wildlife, including waterfowl, which may create bird strike hazards for low-flying aircraft in the vicinity. However, due to the distance of the area from the nearest airport (approximately 4 miles), it is unlikely that this would pose a significant impact on aircraft. Additionally, the area is not located within a designated AIA. Therefore, impacts resulting in a safety hazard for people residing or working in a designated AIA would be less than significant, similar to the proposed project.

f. Historical, Archaeological, and Tribal Cultural Resources

Issue 1: Historical Resources

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. Similar to the proposed project, the Wetlands Optimized Alternative would provide conceptual-level improvements that may result in alteration, relocation, or demolition of potentially historic built environment resources, including the Mission Bay RV Resort, De Anza Cove mobile home park, Campland, and Mission Bay Boat and Ski Club as well as the Mission Bay Golf Course

and Practice Center and Pacific Beach Tennis Club. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting when the setting contributes to the resource's significance. Similar to the proposed project, implementation of the Wetlands Optimized Alternative could result in the alteration, relocation, or demolition of potentially historic buildings, structures, objects, or sites. Similar to the proposed project, future development within the project area would be reviewed for conformance with the City's Municipal Code, Section 143.0212, which requires review of all building, demolition, or entitlement applications impacting a building 45 years old or older to determine whether historical resources exist in the project area prior to issuance of the permit. If the resource is found to be significant and would be adversely impacted by the project, discretionary entitlement and project-specific mitigation measures would be required. Adherence to the Historical Resources regulations and Guidelines would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery, and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines. However, even with framework conformance to the City's Municipal Code, Section 143.0212, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to historic buildings, structures, objects, or sites, would remain significant and unavoidable, similar to the proposed project.

Issue 2: Prehistoric and Historic Archaeological Resources, Sacred Sites, and Human Remains

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. The Wetlands Optimized Alternative proposes construction, enhancement, and hydrologic restoration in the same development footprint as the proposed project. Similar to the proposed project, the South Coastal Information Center records search resulted in the identification of two archaeological resources located within the project area: P-37-005017 and P-37-011571, both of which are of high interest to the local Native American Kumeyaay community because of their proximity to the project area, including the Ethnohistoric village of La Rinconada de Jamo (P-37-005017). Archival review of P 37 005017, La Rinconada de Jamo, which contains rich prehistoric habitation midden deposits, suggests that the concentration of the site is north of the Wetlands Optimized Alternative project area. The existing Mission Bay Tennis Center, Athletic Fields, and Golf Course components were also determined to be in a moderate cultural sensitivity area due to the presence of P-37-005017. Therefore, similar to the proposed project, the Wetlands Optimized Alternative could potentially impact P-37-005017 and P-37-011571 through ground disturbance or alteration.

Similar to the proposed project, undiscovered human remains, particularly those interred outside formal cemeteries, could be disturbed during grading, excavation, or other ground-disturbing activities associated implementation of the Wetlands Optimized Alternative. The treatment and disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is regulated by California Public Resources Code, Section 5097.98, as amended by Assembly Bill 2641, which addresses the disposition of Native American burials, protects remains, and

appoints the California Native American Heritage Commission to resolve disputes. In addition, California Health and Safety Code, Section 7050.5, includes specific provisions for the protection of human remains in the event of discovery, and Section 7052 makes the willful mutilation, disinterment, or removal of human remains a felony. The California Health and Safety Code is applicable to any project where ground disturbance would occur.

The Wetlands Optimized Alternative would comply with applicable federal, state, and local regulations, including the City's Municipal Code and General Plan policies that provide for regulation and protection of prehistoric and historic archaeological resources and human remains. However, it is not possible to ensure the successful preservation of all prehistoric and historic archaeological resources and human remains because there may be some unknown resources disturbed during excavation due to the cultural sensitivity of the area. Therefore, implementation of the Wetlands Optimized Alternative could adversely impact prehistoric or historic archaeological resources, including unknown religious or sacred use sites and human remains. This impact would be potentially significant. Implementation of Mitigation Measure **MM HIST 5.6-1**, combined with the policies of the City's General Plan promoting the identification, protection, and preservation of archaeological resources in addition to compliance with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which requires the determination for a site-specific survey by City management prior to the issuance of construction or development permits for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to prehistoric or historic archaeological resources. However, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to prehistoric and historic archaeological resources, sacred sites, and human remains would remain significant and unavoidable, similar to the proposed project.

Issue 3: Tribal Cultural Resources

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. However, the Wetlands Optimized Alternative proposes construction, enhancement, and hydrologic restoration in the same development footprint as the proposed project. Recent geoarchaeological testing shows that the Mission Bay Tennis Center, Athletic Fields, and Golf Course are covered by 8 feet of artificial fill. Native soil was located closer to the surface in the northeastern segment of the golf course. Previous reports recommended cultural monitoring for ground disturbance in the northeastern section of the golf course containing shallow native soils or in areas where disturbance would be greater than 8 feet deep in the rest of the golf course.

The Wetlands Optimized Alternative also proposes preservation of the KFMR/NWP. Restoration and enhancement activities proposed within the City-owned portions of the KFMR/NWP could adversely affect an adjacent recorded archaeological site (P-37-011571), which consists of marine shell and lithic artifacts from intermittent camping during seasonal use of the area by coastal Kumeyaay people. Archaeological testing and monitoring in this area has yielded materials that can also be defined as a TCR.

The Sacred Lands File search requested from the California Native American Heritage Commission indicated that although the search was negative for sacred lands or Native American cultural resources, the absence of specific resource information in the Sacred Lands File does not preclude the presence of Native American cultural resources in the project area. In addition to the South Coastal Information Center records search and California Native American Heritage Commission Sacred Lands File search, a field survey was conducted with Native American Kumeyaay monitor participation, and no new information was obtained regarding existing sites within the project area. Despite the negative survey results, archaeological and TCRs are known to exist in the project area, and for this reason, the local Native American Kumeyaay community has expressed a high level of interest with regard to potential impacts to known resources including the village of *La Rinconada de Jamo (*P-37-005017) and Crown Point (P-37-011571), portions of which are within or adjacent to the project. Proximity to these two resources were discussed during Tribal consultation, along with the project scope in general, and the proposed mitigation framework for archaeological and TCRs. Clint Linton, Director of Cultural Resource for the lipay Nation of Santa Ysabel, reviewed the materials during Assembly Bill 52 consultation and did not have any concerns with the program-level analysis and subsequent mitigation framework; however, he provided additional feedback that included a request to expand the Tribal context discussion and recommendations for areas of sensitivity. Lisa Cumper, Tribal Historic Preservation Officer from the Jamul Indian Village of Kumeyaay Nation, concurred with these recommendations, as did City staff, and Tribal consultation was concluded. Additional Tribal consultation pursuant to AB 52 was also initiated in late 2022 and is ongoing.

With respect to TCRs, subsequent activities implemented in accordance with the project where a recorded archaeological site or TCR (as defined in the California Public Resources Code) is identified, the City would initiate consultation with identified California Native American tribes pursuant to the provisions in California Public Resources Code, Sections 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52.

The Wetlands Optimized Alternative would comply with federal, state, and local regulations, including the City's Municipal Code, which would provide for the regulation and protection of TCRs and would reduce and/or minimize potential impacts. However, it is not possible to ensure the successful preservation of all TCRs because there may be some unknown resources disturbed during excavation due to the cultural sensitivity of the area. Therefore, implementation of the Wetlands Optimized Alternative could adversely impact TCRs, and impacts would be potentially significant. Implementation of Mitigation Measure **MM HIST 5.6-1**, and compliance with the policies of the General Plan promoting the identification, protection, and preservation of archaeological resources, in addition to compliance with CEQA and California Public Resources Code, Section 21080.3.1, requiring Tribal consultation early in the development review process, and the City's Historical Resources regulations (City's Municipal Code, Section 143.0212), which require the determination for a site-specific survey by City management prior to the issuance of construction or development permits for any parcel identified as sensitive on the Historical Resources Sensitivity Maps, would reduce the program-level impact related to TCRs. However, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to TCRs would remain significant and unavoidable, similar to the proposed project.

g. Hydrology/Water Quality

Issue 1: Flooding and Drainage Patterns

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats) by converting the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. Compared to the proposed project, the Wetlands Optimized Alternative would further reduce the overall impervious footprint in the project area by transforming existing developed uses to natural wetland habitat. Similarly, future enhancement activities would be required to comply with the National Pollution Discharge Elimination System and Hydromodification Management Plan requirements as described in the City's Stormwater Standards Manual (City of San Diego 2021b) to properly convey stormwater runoff through the project area. In addition, the combination and layout of recreation and athletic facilities would be designed during the General Development Plan process and at the time of redevelopment. The overall development density of the Wetlands Optimized Alternative would be reduced compared to the proposed project and would not result in an increase in runoff volume that would result in flooding. Therefore, impacts associated with flooding due to an increase in impervious surfaces or a change in absorption rates, drainage patterns, or the rate of surface runoff would be less than significant, similar to the proposed project.

Issue 2: Water Quality

Construction

Similar to the proposed project, construction of the Wetlands Optimized Alternative would require grading and excavation of soils but slightly more than the proposed project, which would loosen sediment and have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would require the use of heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. These potentially harmful materials could be accidentally spilled or be improperly disposed of during construction and, if mixed with surface water runoff, wash into and pollute receiving waters. Pollutants generated from the alternative during its construction period would be temporary and addressed through preparation of a project-specific SWPPP in accordance with the City's Stormwater Standards Manual and the City's Grading Ordinance and would implement similar construction best management practices (BMPs) as the proposed project. Adherence to applicable requirements and implementation of BMPs would ensure that pollutant discharge associated with construction activities would be minimized, and impacts would be less than significant but slightly greater compared to the proposed project.

Operation

Compared to the proposed project, the Wetlands Optimized Alternative would have the potential to result in reduced long-term operational pollutants associated with components of the project due to a reduction in low-cost visitor guest accommodations and active recreation land uses. Similar to the proposed project, due to its location within and adjacent to Rose Creek and Mission Bay, the immediate pollutants of concern for this alternative are those that contribute to the eutrophic

conditions at the mouth of the Rose Creek inlet (nutrients) and the high coliform counts along the Mission Bay shoreline. In addition, the expansion and regrading required for wetland restoration could lead to increased erosion. Therefore, operation of the project could increase pollutant discharge to receiving waters. However, similar to the proposed project, in accordance with the City's Stormwater Standards Manual (City of San Diego 2021b), the Wetlands Optimized Alternative would be required to incorporate post-construction (or permanent) Low Impact Development site design, source control, and treatment control BMPs into the alternative's design. In addition, similar to the proposed project, water quality design features would be incorporated along the edges of the active recreational areas. The proposed water quality detention basins would be of differing sizes and would capture and treat stormwater before flowing into Mission Bay. New water quality basins would be located to treat the entire alternative area in accordance with local and state requirements. Impacts would be less than significant and reduced compared to the proposed project.

Impact 3: Groundwater

Similar to the proposed project, the Wetlands Optimized Alternative would not use groundwater resources. Water supply for the alternative would be provided by the City through the Miramar/Murray Reservoirs, which contain adequate surface water supplies to serve the project. No on-site groundwater wells would be installed. Therefore, groundwater resources would not be depleted, and pollutants within the groundwater would not be concentrated due to groundwater extraction. The project would have a less than significant impact on groundwater supplies.

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats). The project would increase the amount of permeable surface area compared to the proposed project due to a reduction in low-cost visitor guest accommodations and active recreation land uses, increasing the rate of infiltration of stormwater. Similar to the proposed project, the Wetlands Optimized Alternative would implement construction BMPs to clean up contaminant spills in accordance with the construction SWPPP, and any such potential contamination would be unlikely to affect groundwater through infiltration. Upon preparation and implementation of a SWPPP, consistent with regulatory requirements, impacts to groundwater would be less than significant, similar to the proposed project.

h. Noise

Issue 1: Ambient Noise

Traffic Noise

The Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site. Therefore, similar to the proposed project, this alternative would not result in or create a significant increase in existing ambient noise levels from vehicle noise.

Operational Noise

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats). Similar to the proposed project, the Wetlands Optimized Alternative would result in a net reduction in noise at adjacent noise-sensitive land uses (Mission Bay High School and residences north and west of the project area). This is due to the increase in wetlands restoration and moving noise-generating uses (Campland and Mission Bay RV Resort) away from sensitive noise receptors (Mission Bay High School and residences north and west of the project area). Impacts would be less than significant and reduced compared to the proposed project.

Issue 2: Vehicle Noise

The Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site, which would result in a decrease in traffic-related noise. Therefore, similar to the proposed project, the Wetlands Optimized Alternative would not result in an increase in vehicle noise and would not result in the exposure of people to current or future transportation noise levels that exceed standards established in the City's General Plan Noise Element. Noise compatibility impacts associated with operation of this alternative would be less than significant and reduced compared to the proposed project.

Issue 3: Airport Compatibility

Similar to the proposed project, the nearest airports to the Wetlands Optimized Alternative are the San Diego International Airport and the Montgomery-Gibbs Executive Airport, each located approximately 4 miles from the project area. Although aircraft departures are audible throughout the project area, aircraft noise contributes less than 65 dBA Community Noise Equivalent Level (CNEL) to the noise environment of the project area. Neither exterior nor interior noise compatibility impacts would occur at any of the alternative land uses, similar to the proposed project. Therefore, implementation of this alternative would result in a less than significant impact related to compatibility with aircraft noise levels, similar to the proposed project.

Issue 4: Noise Ordinance Compliance

As discussed above, the Wetlands Optimized Alternative is anticipated to result in a noise reduction at adjacent noise-sensitive land uses due to the removal of existing noise-generating uses near sensitive receptors and the location of new/replacement uses (low-cost visitor guest accommodations) farther from those sensitive receptors. Since this alternative would result in a noise reduction over the existing baseline condition, it would not exceed the City's noise standards. Proposed future uses would be required to comply with the City's Municipal Code, Section 59.5.0401 of the City's Noise Abatement and Control Ordinance. Impacts would be less than significant and reduced compared to the proposed project.

Issue 5: Temporary Construction Noise

Construction of the Wetlands Optimized Alternative would result in temporary localized increases in noise levels from on-site construction equipment, as well as from off-site trucks hauling construction materials from demolition of existing developed areas. This alternative would require a similar construction fleet and activities as the proposed project and would result in similar temporary construction noise levels. As such, construction of the Wetlands Optimized Alternative would have the potential to result in construction noise that exceeds the noise level limit in the City's Municipal Code, Section 59.5.0404. Mitigation Measure **MM NOI 5.8-1** required for the proposed project would also be required for the Wetlands Optimized Alternative and would reduce this impact to a less than significant level, similar to the proposed project.

Issue 6: Groundborne Vibration

As stated above regarding construction noise, the Wetlands Optimization Alternative would require a similar construction fleet and activities during construction compared to the proposed project. The anticipated types of construction activity and equipment required for construction would not result in excessive vibration levels. Impacts would be less than significant, similar to the proposed project.

i. Paleontological Resources

Issue 1: Paleontological Resources

Compared to the proposed project, the Wetlands Optimized Alternative would create additional acres of wetlands and associated transitional zones and uplands (low-mid-high wetland/salt marsh and mudflats). The Wetlands Optimized Alternative proposes construction, enhancement, and hydrologic restoration in the same project footprint as the proposed project. Similar to the proposed project, areas of the Wetlands Optimized Alternative are underlain by the Bay Point Formation, which is assigned a high paleontological resource sensitivity in the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego 2022c). Grading activities associated with future implementation of the proposed alternative, specifically at the De Anza Cove peninsula, would result in earthwork greater than 1,000 cubic yards in quantity, extending to a depth of 10 feet or greater into high sensitivity formations, or grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site. Compliance with the grading requirements in the City's Municipal Code, Section 142.0151, which address paleontological resources, would ensure that impacts would be less than significant, similar to the proposed project.

j. Transportation and Circulation

Issue 1: Conflict with Adopted Transportation Program, Plan, Ordinance, or Policy

City of San Diego Mobility Element

Similar to the proposed project, the Wetlands Optimized Alternative would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities and

would support policies and goals in the MBPMP to make biking more comfortable and accessible for people of all ages and abilities by providing better-quality bicycle facilities. The Mid-Coast Trolley, which consists of the MTS Blue Line Trolley line extension from Downtown San Diego to the University community, is located east of the project area. The Balboa Avenue Station, located approximately 0.25 mile northeast of the project area, and the Clairemont Drive Station, located approximately 0.75 mile southeast of the project area, would provide region-serving high-quality light-rail transit to the project area that would meet Goal MEB.9.d to locate new public facilities that generate large numbers of person trips, including recreational facilities in areas with existing or planned transit access. Therefore, the alternative would not conflict with the goals and policies of the City's General Plan Mobility Element, similar to the proposed project.

City of San Diego Complete Communities

Similar to the proposed project, the Wetlands Optimized Alternative would meet the goal of the Complete Communities Program to provide more mobility options to City residents. In addition, the project would include multi-use pathways for pedestrians and bicyclists that would provide connections to existing public transit facilities. Similar to the proposed project, the Wetlands Optimized Alternative would provide improved pedestrian and bicycle infrastructure to connect the active recreation uses on site to the surrounding community and would enhance opportunities for residences to walk, bike, relax, and play.

The Mobility Choices Program supports implementation of an enhanced active transportation network in VMT-efficient areas and implementation of VMT reduction measures to encourage and support the use of the active transportation network. The improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residents would serve to reduce VMT. The Wetlands Optimized Alternative would reduce overall development density compared to the proposed project, which would decrease vehicle trips and would be consistent with the goals of the Mobility Choices Program.

San Diego Association of Governments 2021 Regional Plan

Similar to the proposed project, the Wetlands Optimized Alternative would include project components that support the policy objectives of the 2021 Regional Plan. The project would support the 2021 Regional Plan vision by providing improved pedestrian and bicycle facilities, including off-site connections with the surrounding community, and would make improvements to a currently developed site. The improved walking and bicycling facilities and parkland areas accessible for use by nearby existing residents would serve to reduce VMT. The Wetlands Optimized Alternative would reduce overall development density, which would decrease vehicle trips compared to the proposed project. The Wetlands Optimized Alternative would not include any components that would conflict with implementation of the 2021 Regional Plan. Therefore, the Wetlands Optimized Alternative would be supportive of policies, plans, and programs maintaining the City's transportation system, including transit, roadways, and bicycle and pedestrian facilities.

Impacts would be less than significant, similar to the proposed project.

Issue 2: Vehicle Miles Traveled

The Wetlands Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site and the total VMT would be reduced compared to the proposed project. Compared to the proposed project, the Wetlands Optimized Alternative would create additional acreage of wetlands and upland habitat while reducing the acreages of the active recreation and low-cost visitor guest accommodations. With the reduction of low-cost visitor guest accommodations, the regional service area of the remaining coastal accessible facilities would expand compared to the proposed project. The service area is the same as that for the proposed project and focuses on publicly accessible coastal low-cost visitor guest accommodation facilities including South Carlsbad State Beach, San Elijo State Beach, Silver Strand State Beach, Mission Bay Campland, and Tijuana Valley Campground. The driving distance for residents within the region would increase under this alternative, from increased distance to other facilities providing low-cost visitor guest accommodations, resulting in an increase in regional VMT compared to the proposed project. Therefore, the Wetlands Optimized Alternative would result in an increase in regional VMT compared to the proposed project. Impacts would be greater compared to the proposed project.

Issue 3: Hazards Due to Design Feature or Incompatible Use

Similar to the proposed project, the Wetlands Optimized Alternative does not propose any uses that would result in incompatible roadway use, such as operation of farm equipment or other special equipment. Vehicular access to the project area would be provided from Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation. Improvements would be constructed in accordance with the standards in the San Diego Municipal Code, City's Standard Drawings (Appendix H of the City's Land Development Manual) (City of San Diego 2021c), and the City's Street Design Manual (Appendix I of the City's Land Development Manual) (City of San Diego 2017), which provide specifications for concrete structures, drainage systems, electrical systems, general surface improvements, sprinkler irrigation systems, landscaping, recycled water systems, sewer systems, stormwater systems, and water systems constructed within the City. Therefore, implementation of the Wetlands Optimized Alternative would not result in increased hazards due to a design feature or incompatible uses. Impacts would be less than significant, similar to the proposed project.

Issue 4: Inadequate Emergency Access

Inadequate emergency access and egress can occur as a result of an incomplete or not fully interconnected roadway network, such as inadequate roadway widths, turning radii, dead-end or gated roads, one-way roads, single ingress and egress routes, or other factors. Similar to the proposed project, vehicular access to the project area under this alternative would be provided from existing roads, namely Pacific Beach Drive, Grand Avenue, and North Mission Bay Drive. Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, boating, and active recreation, similar to the existing site condition. The design would be consistent with the City's fire apparatus access roadway requirements as outlined in California Fire Code, Section 503, which includes requirements for emergency access. Therefore, the

Wetlands Optimized Alternative would not result in inadequate emergency access. Impacts would be less than significant, similar to the proposed project.

8.3.2.3 Relationship to Project Objectives

The Wetlands Optimized Alternative would meet project objective 2 by fostering opportunities for members of local Tribal nations to reconnect to De Anza Cove. In addition, the expanded habitat restoration provides an opportunity to increase climate change resiliency from sea level rise impacts (project objective 3). Wetlands provide erosion control and shoreline protection from flooding. Additional habitat areas would include transitional zones into higher elevation habitats and provide resiliency to changes in freshwater flows from altered stormwater regimes. In addition, the Wetlands Optimized Alternative would further embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objective 4). However, the Wetlands Optimized Alternative would not meet project objectives 1 and 6 because, compared to the proposed project, it would not as fully provide equitable access or enhance the public access of De Anza Cove. The Wetlands Optimized Alternative would convert the southern portion of the developed De Anza "boot" and the De Anza Cove open water areas to wetlands. This would result in a reduction in low-cost visitor guest accommodations and open beach uses. Furthermore, the Wetlands Optimized Alternative would not fully implement project objective 5, as active and passive recreational uses would be further reduced, therefore also reducing the customer base and opportunities for passive and active recreation, compared to the proposed project.

8.3.3 Enhanced Wetlands/Optimized Parkland Alternative

8.3.3.1 Description

Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would include a combination of habitat restoration, active recreation, low-cost visitor guest accommodations, open beach and regional parkland and would modify the open water portions of De Anza Cove. Table 8-4, Comparison of Enhanced Wetlands/Optimized Parkland Alternative to the Proposed Project, compares the land uses and acreages of the alternative to the proposed project. As shown on Figure 8-4, Enhanced Wetlands/Optimized Parkland Alternative, the alternative includes additional wetland enhancement opportunities but would reduce upland habitat compared to the proposed project. This alternative would provide 243.3 acres of marshland habitat that includes 35.5 acres at the former Campland, 86.8 acres at KFMR, and 121 acres of other new wetlands. This alternative would provide 29.2 acres of upland habitat and buffer. In addition, the Enhanced Wetlands/Optimized Parkland Alternative would reduce the amount of active recreational activities to 52.6 acres and the low-cost visitor guest accommodations to 40 acres, compared to the proposed project. The Enhanced Wetlands/Optimized Parkland Alternative would seek to retain potentially historic structures over 45 years old, such as the administration buildings for De Anza Cove mobile home park and/or the Mission Bay RV Resort, for reuse in the low-cost visitor guest accommodation area. This alternative would also retain the Mission Bay Golf Course Practice Center and Clubhouse for reuse within the active and regional parkland areas. Finally, the Enhanced Wetlands/Optimized Parkland Alternative would change the development configuration and reduce the open water areas of De Anza Cove compared to the proposed project.

Table 8-4. Comparison of Enhanced Wetlands/Optimized Parkland Alternative to the Proposed Project		
Land Use	**Enhanced Wetlands/Optimized Parkland Alternative (acres)**	**Proposed Project (acres)**
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	156.5[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	29.2	37.4
Low-Cost Visitor Guest Accommodations	40	48.5
Regional Parkland	40	26.3
Boat Facilities/Clubhouse	2.3	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	0.7	2.1
Active Recreation	52.6	60.1
Open Water	91.2	95.9
Open Beach	4.3	5.5
Road[4]	2.3	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes 35.5 acres currently occupied by Campland and 121 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future GDP.

[3] Boat lease areas overlap with other land uses; therefore, acreages are not included in the total.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, and active recreation, subject to future design.

8.3.3.2 Analysis of Enhanced Wetlands/Optimized Parkland Alternative

a. Land Use

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acreage of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. The Enhanced Wetlands/Optimized Parkland Alternative would result in the relocation of Campland, consistent with the recommendations of the MBPMP. The Enhanced Wetlands/Optimized Parkland Alternative would be consistent with the current General Plan land use designation and would implement active transportation features as called for by the City's General Plan Mobility Element. This alternative would also enhance and restore wetlands and other habitats within the project area, implementing goals included in the City's General Plan Recreation and Conservation Elements. The Enhanced Wetlands/Optimized Parkland Alternative would not conflict with the goals, objectives, and guidelines of the City's General Plan. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would also comply with LDC regulations and CCA requirements regarding development and would enhance and restore the Coastal Zone environment as called for in the CCA. This alternative would also include active transportation connections, which would reduce VMT and associated GHG emissions in line with the goals and objectives of SANDAG's 2021 Regional Plan and the City's CAP, and would implement multimodal improvements called for by the BASASP. The Enhanced Wetlands/Optimized Parkland Alternative would protect, improve, and enhance natural resources in Mission Bay as called for by the

Mission Bay NRMP and would include wetland enhancement and restoration activities in support of Strategy 5 of the City's CAP, which promotes the creation of resilient infrastructure and healthy ecosystems, and policies in the City's Climate Resilient SD Plan, which call for supporting ecosystem and watershed functions and expanding natural features including wetlands (see Policies TNE-1 and TNE-2). This alternative would also not result in any development that would conflict with the Pacific Beach Community Plan and LCP Land Use Plan. In addition, the Enhanced Wetlands/Optimized Parkland Alternative would result in increased acreage of natural open space compared to the proposed project, which is consistent with the existing land use designation and goals of the MBPMP and would not result in the conversion of open space to a more intensive land use. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would not conflict with the City's MSCP SAP. Finally, similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative is not within the AIA of local airports and would not be subject to an ALUCP. Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would have similar land use impacts compared to the proposed project.

b. Air Quality and Odor

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acreage of wetlands and regional parkland while reducing the amount of the upland habitat and low-cost visitor guest accommodations. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would include land uses that are consistent with the MBPMP, and air quality impacts associated with the MBPMP implementation were analyzed within the existing RAQS, including natural areas, active recreation, and low-cost visitor guest accommodations and would result in a similar less than significant impact related to a conflict with or obstruction of implementation of the applicable air quality plan. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in greater construction emissions due to the increase in wetland enhancement; however, construction impacts would be temporary. Cut and fill would be balanced on site. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would be required to comply with SDAPCD Rule 55, Fugitive Dust Control and Rule 67.0.1, Architectural Coatings and the City's Municipal Code, Chapter 14, Article 2, Division 7. However, compared to the proposed project, operational emissions would be reduced because the alternative would result in less development and there would be an overall reduction in low-cost visitor guest accommodations. Therefore, compared to the proposed project, mobile-source emissions would decrease under the Enhanced Wetlands/Optimized Parkland Alternative due to a decreased customer base. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in a similar less than significant impact related to sensitive receptors and other emissions (such as those leading to odors). Overall, the Enhanced Wetlands/Optimized Parkland Alternative would have reduced air quality and odor impacts compared to the proposed project.

c. Biological Resources

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. Like the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would be subject to the MSCP General Planning Policies and Design Guidelines, MSCP General Management Directives, species-specific ASMDs, MHPA LUAG, and

General Plan Conservation Element consistency analysis. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would conform with the City's MSCP SAP and the species-specific ASMDs as applicable, and direct impacts to sensitive wildlife species would be less than significant. In addition, similar to the proposed project potential direct impacts to sensitive wildlife species that are not covered by the MSCP SAP or fully protected under the California Endangered Species Act (CESA) occur under this alternative and implementation of Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would reduce impacts to a less than significant level. Although the Enhanced Wetlands/Optimized Parkland Alternative would result in increased natural area compared to the proposed project, this alternative would not change the potential direct impacts to sensitive vegetation communities during construction, and impacts would be potentially significant without mitigation. Implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce impacts to a less than significant level. In addition, this alternative would remove developed land in exchange for additional jurisdictional aquatic resource area, including wetland and non-wetland waters, and would result in increased jurisdictional aquatic resources compared to the proposed project, which would result in potentially significant direct impacts to jurisdictional aquatic resources. Similarly, implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce direct impacts to jurisdictional aquatic resources to a less than significant level.

The Enhanced Wetlands/Optimized Parkland Alternative would result in increased natural area, potentially expanding the wildlife movement corridors and habitat connectivity in the area. It would not have a significant impact on habitat linkages over the long-term because the overall habitat quality of the existing corridors would increase under this alternative. Because the Enhanced Wetlands/Optimized Parkland Alternative would occur in the same location, result in similar impacts to biological resources, and implement the same mitigation measures as the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would not conflict with the MSCP SAP. Finally, similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would have the same potential to introduce non-native invasive species of plants into the natural open space areas of KFMR/NWP and Mission Bay compared to the proposed project. This alternative would comply with the MSCP SAP, San Diego RWQCB Municipal Permit, City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations and incorporate invasive plant species removal into habitat restoration (Mitigation Measure **MM BIO 5.3-5**) to reduce potential impacts from invasive plant species to below a level of significance. Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in similar biological resources impacts compared to the proposed project. All impacts would be reduced to below a level of significance with mitigation.

d. Greenhouse Gas Emissions

The Enhanced Wetlands/Optimized Parkland Alternative, like the proposed project, proposes land uses that would be consistent with the City's General Plan and the City's CAP. Please refer to Table 5.4-1, General Plan and Climate Action Plan Consistency, in Section 5.4, Greenhouse Gas Emissions, of this PEIR for a detailed consistency discussion. The Enhanced Wetlands/Optimized Parkland Alternative would particularly support implementation of CAP Strategy 5, Resilient Infrastructure and Healthy Ecosystems. Compared to the proposed project, this alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. The Enhanced Wetlands/Optimized Parkland

Alternative would also be consistent with the Climate Resilient SD Plan, SANDAG's 2021 Regional Plan, and CARB's 2022 Scoping Plan.

This alternative would result in greater impacts related to GHG emissions due to construction grading of additional wetland; however, temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections and, thus, were accounted for in the CAP. Furthermore, these emissions are outweighed by the reduced impacts related to operational GHG emissions due to less development and an overall reduction in low-cost visitor guest accommodations. Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in reduced less than significant GHG emissions impacts compared to the proposed project.

e. Hazards and Hazardous Materials

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. Similar to the proposed project, the alternative's project area would be surrounded by existing development, including commercial, residential, and recreation land uses. The alternative would allow for defensible spaces between project components and neighboring buildings and vegetation. Defensible space between vegetated areas would decrease the spread of wildfires and reduce the risk and impacts would be less than significant. Similar to the proposed project, equipment used during grading and construction could result in incidental spills of petroleum products and hazardous substances and such spills would be contained on site in accordance with the SWPPP. In addition, the Enhanced Wetlands/Optimized Parkland Alternative would not introduce any land uses, such as industrial, that would result in hazardous emissions or exposure of schools to hazardous materials. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would be consistent with requirements for emergency vehicle access, and no components of this alternative would impair the implementation of or compliance with an adopted evacuation plan. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative could encounter soil contamination during grading and excavations that could result in potentially significant hazards and hazardous materials impacts to on-site construction personnel. Implementation of Mitigation Measures **MM HAZ 5.5-1** through **MM HAZ 5.5-4** would reduce impacts to a less than significant level. Finally, similar to the proposed project, the alternative's project area is not located within the designated AIA of nearby airports and project components would not result in a safety hazard for people residing or working in a designated AIA. Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in similar hazards and hazardous materials impacts as the proposed project.

f. Historical, Archaeological, and Tribal Cultural Resources

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing upland habitat and low-cost visitor guest accommodations. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in reduced impacts related to historical resources because this alternative would seek to retain potentially historic structures over 45 years old, such as the administration buildings for De Anza Cove mobile home park and/or the Mission Bay RV Resort, for reuse in the low-cost visitor guest accommodation area. This alternative would also retain the Mission

Bay Golf Course Practice Center and Clubhouse for reuse within the active and regional parkland areas. Similar to the proposed project, this alternative would result in the alteration or demolition of potentially historical resources over 45 years in age in other areas of the project area, such as Campland, Pacific Beach Tennis Club and the Mission Bay Boat and Ski Club. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would conform to the Historical Resources regulations and Guidelines, which would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery, and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in similar impacts to archaeological, and TCRs due to similar ground-disturbing activities within the project footprint. Mitigation Measures **MM HIST 5.6-1** would be implemented to reduce significant impacts to unknown archaeological resources, and human remains during project construction. Similar to the proposed project, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to historical resources, prehistoric and historic archaeological resources, sacred sites, human remains, and TCRs would remain significant and unavoidable. The Enhanced Wetlands/Optimized Parkland Alternative would seek to retain some eligible structures over 45 years old and would result in a reduced impact to historical resources compared to the proposed project; however, impacts would remain significant and unavoidable due to the alteration or demolition of other built environment resources in the project area that may be historical.

g. Hydrology/Water Quality

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. The additional acres of wetlands would result in similar impacts related to alteration of the existing floodplains. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in greater construction-generated pollutants because this alternative would convert additional acres of developed land to wetlands which would increase grading and excavation of soils. Construction-generated pollutants would be temporary and addressed through preparation of a project-specific SWPPP in accordance with the City's Stormwater Standards Manual and the City's Grading Ordinance and would include construction BMPs. The increased wetlands would further reduce the impervious footprint of the project area and reduce overall development density resulting in a decrease in long-term operational pollutants, compared to the proposed project. Thus, similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in less than significant impacts related to flooding and drainage patterns, water quality and groundwater. The Enhanced Wetlands/Optimized Parkland Alternative would result in reduced hydrology and water quality impacts, compared to the proposed project.

h. Noise

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland

habitat and low-cost visitor guest accommodations. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in a reduction in average daily traffic and peak-hour trips on weekdays and weekends due to the reduction in low-cost visitor guest accommodations, which would result in a reduction in traffic-related noise. Under this alternative, the total area of developed land would be reduced compared to the proposed project because the alternative would provide more natural habitat and regional recreation uses and would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses, including wetland habitat near the MHPA and sensitive species. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in a reduction in operational noise impacts due to less development and overall reduction in low-cost visitor guest accommodations.

Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would be located outside the 65 dBA CNEL noise contour for the Montgomery-Gibbs Executive Airport and San Diego International Airport and noise compatibility impacts would not occur at any of the proposed land uses.

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in noise reduction at adjacent noise-sensitive land uses due to the removal of existing noise-generating uses (Campland and Mission Bay RV Resort) near sensitive receptors and the location of low-cost visitor guest accommodations farther from those sensitive receptors. This alternative would not exceed the City's noise standards. Similar to the proposed project, proposed future uses under this alternative would be required to comply with the City's Municipal Code, Section 59.5.0401. Similar to the proposed project, construction activities associated with the Enhanced Wetlands/Optimized Parkland Alternative would have the potential to exceed noise levels of 75 dBA up to 150 feet from construction. With the implementation of Mitigation Measure **MM NOI 5.8-1**, construction noise impacts would be reduced to a less than significant level, similar to the proposed project. In addition, the anticipated types of construction activity and equipment required for construction of the Enhanced Wetlands/Optimized Parkland Alternative would not result in excessive vibration levels. Impacts would be less than significant, similar to the proposed project. Overall, the Enhanced Wetlands/Optimized Parkland Alternative would result in reduced noise impacts compared to the proposed project.

i. Paleontological Resources

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would create additional acres of wetlands and regional parkland while reducing the amount of upland habitat and low-cost visitor guest accommodations. Similar to the proposed project, construction activities associated with the Enhanced Wetlands/Optimized Parkland Alternative would trigger the thresholds for significance for paleontological resources (i.e., earthwork greater than 1,000 cubic yards in quantity within a high sensitivity paleontological geological unit or earthwork greater than 2,000 cubic yards in quantity within a moderate sensitivity paleontological geological unit). Compliance with the City's Municipal Code, Section 142.0151, would ensure that impacts would be less than significant by requiring paleontological resources monitoring. Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in similar less than significant paleontological resources impacts as the proposed project.

j. Transportation and Circulation

Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in on-site traffic-generating land uses. Similar to the proposed project, circulation for the Enhanced Wetlands/Optimized Parkland Alternative would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities and would support policies and goals within the MBPMP to make biking more comfortable and accessible for people of all ages and abilities by providing better-quality bicycle facilities and connections to the active recreation uses on site and in the surrounding community. The alternative would also provide similar region-serving high-quality light-rail transit to the project area. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would not conflict with the City's General Plan Mobility Element, City's Mobility Choices Program, and SANDAG's 2021 Regional Plan. Compared to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would reduce the amount of low-cost visitor guest accommodations, which would expand the service area of similar coastal accessible facilities within the region and increase the driving distance for residents within the region, resulting in an increase in regional VMT compared to the proposed project. Similar to the proposed project, the Enhanced Wetlands/Optimized Parkland Alternative would include the construction of service roads, vehicular access points, and parking areas in accordance with the standards in the San Diego Municipal Code, City's Standard Drawings (City of San Diego 2021c), and City's Street Design Manual (City of San Diego 2017) and would comply with requirements for emergency vehicle access such as the City's fire apparatus access roadway requirements. Overall, the Enhanced Wetlands/Optimized Parkland Alternative would result in increased VMT impacts compared to the proposed project.

8.3.3.3 Relationship to Project Objectives

The Enhanced Wetlands/Optimized Parkland Alternative would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2). In addition, the alternative proposes expanded wetland restoration that would provide an opportunity to increase climate change resiliency from sea level rise impacts (project objective 3). Wetlands provide erosion control and shoreline protection from flooding. The Enhanced Wetlands/Optimized Parkland Alternative would further embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objective 4). In addition, the Enhanced Wetlands/Optimized Parkland would enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities through the inclusion of the multi-use path which would allow for pedestrians and cyclists to connect with points west, north and east (project objective 6). However, the Enhanced Wetlands/Optimized Parkland Alternative would not fully implement project objectives 1 and 5 as it would not fully provide equitable access to De Anza Cove nor fully diversify active and passive recreational uses because this alternative would reduce the amount of low-cost guest visitor accommodations, open beach, active recreation and regional recreation opportunities compared to the proposed project.

8.3.4 Resiliency Optimized Alternative

8.3.4.1 Description

Similar to the proposed project, the Resiliency Optimized Alternative would include a combination of habitat restoration, active recreation, low-cost visitor guest accommodations, open beach and regional parkland and would modify the open water portions of De Anza Cove. Table 8-5, Comparison of Resiliency Optimized Alternative to the Proposed Project, compares the land uses and acreages of the alternative to the proposed project. As shown on Figure 8-5, Resiliency Optimized Alternative, the alternative includes additional wetlands enhancement and upland habitat opportunities compared to the proposed project. The additional habitat areas would include transitional zones into higher elevation habitats and provide resiliency to changes in freshwater flows from altered stormwater regimes. Marshes also act as buffers to sea level rise and reduce coastal erosion and flooding.

This alternative would provide 235.3 acres of expanded marshland habitat that includes 31.4 acres at the former Campland, 86.8 at KFMR/NWP, and 117.1 acres of other new wetlands. The alternative also includes an increase in upland habitat and buffers compared to the proposed project. The Resiliency Optimized Alternative would further reduce the amount of active recreational activities to 49.9 acres and reduce low-cost visitor guest accommodations to 45.3 acres. These areas would be replaced with additional regional parkland opportunities for a total of 32.3 acres. In addition, the Resiliency Optimized Alternative reduces the overall acreage of the open water portions of De Anza Cove to 101.7 acres.

Table 8-5. Comparison of Resiliency Optimized Alternative to the Proposed Project

Land Use	Resiliency Optimized Alternative (acres)	Proposed Project (acres)
KFMR/NWP	86.8	86.8
Expanded Marshland/Habitat	148.5[1]	140.5
Upland Habitat (Dune, Sage) and Buffer Area	38.8	37.4
Low-Cost Visitor Guest Accommodations	45.3	48.5
Regional Parkland	32.3	26.3
Boat Facilities/Clubhouse	3.1	2.6
Interpretive Nature Center (1 Location)[2]	—	—
Potential Water Lease[3]	1.2	2.1
Active Recreation	49.9	60.1
Open Water	95.2	95.9
Open Beach	3.4	5.5
Road[4]	1.8	1.6
Total	**505.2**	**505.2**

Notes: KFMR/NWP = Kendall-Frost Marsh Reserve/Northern Wildlife Preserve

[1] Expanded wetlands includes 31.4 acres currently occupied by Campland, and 117.1 acres of other new wetlands.

[2] Area for the Interpretive Nature Center has not been determined, and programming for the center is assumed to occur after adoption of the amendment as part of a future GDP.

[3] Boat lease areas overlap with other land uses; therefore, acreages are not included in the total.

[4] Service roads, vehicular access, and parking would be in areas proposed for low-cost visitor guest accommodations, regional parkland, and active recreation, subject to future design.

8.3.4.2 Analysis of Resiliency Optimized Alternative

a. Land Use

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of active recreation and low-cost visitor guest accommodations. This alternative would result in the relocation of Campland consistent with the recommendations of the MBPMP. The Resiliency Optimized Alternative would be consistent with the current General Plan land use designation and would implement active transportation features as called for by the City's General Plan Mobility Element. This alternative would also enhance and restore wetlands and other habitats within the project area, implementing goals included in City's General Plan Recreation and Conservation Elements. The Resiliency Optimized Alternative would not conflict with the goals, objectives, and guidelines of the City's General Plan. Similar to the proposed project, this alternative would also comply with LDC regulations and CCA requirements regarding development and would enhance and restore the Coastal Zone environment as called for in the CCA. The Resiliency Optimized Alternative would also include active transportation connections, which would reduce VMT and associated GHG emissions in line with the goals and objectives of SANDAG's 2021 Regional Plan and the City's CAP, and would implement multimodal improvements called for by the BASASP. This alternative would protect, improve, and enhance natural resources in Mission Bay as called for by the Mission Bay NRMP and would include wetland enhancement and restoration activities in support of Strategy 5 of the City's CAP, which promotes the creation of resilient infrastructure and healthy ecosystems, and policies in the City's Climate Resilient SD Plan, which call for supporting ecosystem and watershed functions and expanding natural features including wetlands (see Policies TNE-1 and TNE-2). The Resiliency Optimized Alternative would also not result in any development that would conflict with the Pacific Beach Community Plan and LCP Land Use Plan. In addition, this Alternative would result in increased acreage of natural open space compared to the proposed project, which is consistent with the existing land use designation and goals of the MBPMP and would not result in the conversion of open space to a more intensive land use. Similar to the proposed project, implementation of the Resiliency Optimized Alternative and Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would comply with the City's Biology Guidelines for the preservation, mitigation, acquisition, restoration, management, and monitoring of biological resources. Finally, similar to the proposed project, the Resiliency Optimized Alternative is not within the AIA of local airports and would not be subject to an ALUCP. Therefore, this alternative would have similar land use impacts as the proposed project.

b. Air Quality and Odor

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of active recreation and low-cost visitor guest accommodations. Similar to the proposed project, the Resiliency Optimized Alternative would include land uses that are consistent with the MBPMP, including natural areas, active recreation, and low-cost visitor guest accommodations, and therefore, would be consistent with the assumptions in RAQS and SIP, resulting in a similar less than significant impact related to a conflict with or obstruction of implementation of the applicable air quality plan. Compared to the proposed project, the Resiliency Optimized Alternative would result in greater construction emissions due to the increase in wetland enhancement and upland habitat, but construction impacts would be temporary. However, the cut and

fill would be balanced on site. Similar to the proposed project, the Resiliency Optimized Alternative would be required to comply with SDAPCD Rule 55, Fugitive Dust Control and Rule 67.0.1, Architectural Coatings and the City's Municipal Code, Chapter 14, Article 2, Division 7. Compared to the proposed project, operational emissions would be reduced because the alternative would result in less development and there would be an overall reduction in low-cost visitor guest accommodations. Therefore, mobile-source emissions would decrease under the Resiliency Optimized Alternative due to a decreased customer base compared to the proposed project. The Resiliency Optimized Alternative would result in less than significant impacts related to sensitive receptors and other emissions (such as those leading to odors. Overall, the Resiliency Optimized Alternative would have reduced air quality and odor impacts compared to the proposed project.

c. Biological Resources

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of active recreation and low-cost visitor guest accommodations. Like the proposed project, the Resiliency Optimized Alternative would be subject to the MSCP General Planning Policies and Design Guidelines, MSCP General Management Directives, species-specific ASMDs, MHPA LUAG, and General Plan Conservation Element consistency analysis. Similar to the proposed project, the Resiliency Optimized Alternative conforms with the City's MSCP SAP and the species-specific ASMDs as applicable, direct impacts to sensitive wildlife species would be less than significant. In addition, similar to the proposed project, potential direct impacts to sensitive wildlife species that are not covered by the MSCP SAP or fully protected under CESA would occur under this alternative, and implementation of Mitigation Measures **MM BIO 5.3-1** through **MM BIO 5.3-6** would be required to reduce impacts to a less than significant level. Although the Resiliency Optimized Alternative would result in increased natural area compared to the proposed project, this alternative would not change the potential direct impacts to sensitive vegetation communities during construction, and impacts would be potentially significant without mitigation. Implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce impacts to a less than significant level. The Resiliency Optimized Alternative would result in increased jurisdictional aquatic resources compared to the proposed project and similarly would result in potentially significant direct impacts to jurisdictional aquatic resources. Similarly, implementation of Mitigation Measures **MM BIO 5.3-2** through **MM BIO 5.3-5** would reduce direct impacts to jurisdictional aquatic resources to a less than significant level.

Although the Resiliency Optimized Alternative would result in increased natural area, potentially expanding the wildlife movement corridors and habitat connectivity in the area, this alternative is not expected to have a significant impact on habitat linkage over the long-term because the overall habitat quality of the existing corridors would increase under this alternative. Like the proposed project, the Resiliency Optimized Alternative would be subject to the MSCP General Planning Policies and Design Guidelines, MSCP General Management Directives, species-specific ASMDs, MHPA LUAG, and General Plan Conservation Element consistency analysis, which would help to minimize or avoid any potential impacts from future site-specific projects. Because the Resiliency Optimized Alternative would occur in the same location, result in similar impacts to biological resources, and implement similar mitigation measures as the proposed project, the Resiliency Optimized Alternative would not conflict with the City of San Diego MSCP. Finally, similar to the proposed project, the Resiliency Optimized Alternative would have the same potential to introduce non-native invasive species of plants into the natural open space areas of KFMR/NWP and Mission Bay compared to the proposed project. This alternative would comply

with the MSCP SAP, the San Diego RWQCB Municipal Permit, the City's Stormwater Standards Manual (City of San Diego 2021b), and NPDES regulations and incorporate invasive plant species removal into habitat restoration (Mitigation Measure **MM BIO-5.3-5**) to reduce potential impacts from the introduction of invasive species of plants into a natural open space area. Therefore, the Resiliency Optimized Alternative would result in similar biological resources impacts, compared to the proposed project. All impacts would be reduced to below a level of significance with mitigation.

d. Greenhouse Gas Emissions

Similar to the proposed project, the Resiliency Optimized Alternative proposes land uses that would be consistent with the City's General Plan and the CAP. Refer to Table 5.4-1, General Plan and Climate Action Plan Consistency, in Section 5.4, Greenhouse Gas Emissions, of this PEIR for a detailed consistency discussion. The Resiliency Optimized Alternative would particularly support implementation of Strategy 5, Resilient Infrastructure and Healthy Ecosystems, by creating additional wetland and upland habitat while reducing the amount of the active recreation and low-cost visitor guest accommodations compared to the proposed project. This alternative would also be consistent with the Climate Resilient SD Plan, SANDAG's 2021 Regional Plan, and CARB's 2022 Scoping Plan.

The Resiliency Optimized Alternative would result in greater impacts related to construction GHG emissions due to construction grading and demolition activities; however, temporary project construction emissions were included in the CAP GHG emissions inventory and business-as-usual GHG emissions projections, and were, thus accounted for in the CAP. Furthermore, these emissions are outweighed by reduced impacts related to operational GHG emissions due to less development and an overall reduction in low-cost visitor guest accommodations. Therefore, the Resiliency Optimized Alternative would have reduced, less than significant GHG emission impacts, compared to the proposed project.

e. Hazards and Hazardous Materials

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of the active recreation and low-cost visitor guest accommodations. Similar to the proposed project, the Resiliency Optimized Alternative would be surrounded by existing development, including commercial, residential, and recreation land uses. Similarly, the alternative would allow for defensible spaces between project components and neighboring buildings and vegetation. Defensible space between vegetated areas would decrease the spread of wildfires and reduce the risk and impacts would be less than significant. Similar to the proposed project, the equipment used during project grading and construction could result in incidental spills of petroleum products and hazardous substances and such spills would be contained on site in accordance with the SWPPP. In addition, the Resiliency Optimized Alternative would not introduce any land uses, such as industrial, that would be likely to result in hazardous emissions or exposure of schools to hazardous materials. Similar to the proposed project, the Resiliency Optimized Alternative would be consistent with requirements for emergency vehicle access, and no components of the alternative would impair the implementation of or compliance with an adopted evacuation plan. Similar to the proposed project, the Resiliency Optimized Alternative could encounter soil contamination during grading and excavations that could result in potentially significant hazards and hazardous materials impacts to on-site construction personnel. Implementation of Mitigation

Measures **MM HAZ 5.5-1** through **MM HAZ 5.5-4** would reduce impacts to a less than significant level. Finally, similar to the proposed project, the project area is not located within the designated AIA of nearby airports and project components would not result in a safety hazard for people residing or working in a designated AIA. Therefore, the Resiliency Optimized Alternative would result in similar hazards and hazardous materials impacts, compared to the proposed project.

f. Historical, Archaeological, and Tribal Cultural Resources

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of the active recreation and low-cost visitor guest accommodations. Compared to the proposed project, the Resiliency Optimized Alternative would result in similar impacts related to historical, archaeological, and TCRs because there would be similar types of construction activities that would occur. Similar to the proposed project, the Resiliency Optimized Alternative would confirm to the Historical Resources regulations and Guidelines, which would ensure that appropriate measures are applied to protect historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery, and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines. Mitigation Measures **MM HIST 5.6-1** would be implemented to reduce potentially significant impacts to unknown archaeological resources, and human remains during project construction. However, similar to the proposed project, even with the application of the existing regulatory framework and mitigation framework that would avoid future project-level impacts, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Therefore, after implementation of feasible mitigation measures, impacts to potentially historic buildings, prehistoric and historic archaeological resources, sacred sites, human remains, and TCRs would remain significant and unavoidable. Therefore, the Resiliency Optimized Alternative would result in similar historic, archaeological, and TCR impacts compared to the proposed project, and impacts would remain significant and unavoidable.

g. Hydrology/Water Quality

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the acreages of the active recreation and low-cost visitor guest accommodations. The additional acres of wetlands would result in similar impacts related to alteration of the existing floodplains. Compared to the proposed project, the Resiliency Optimized Alternative would result in greater construction-generated pollutants as this alternative would convert additional acres of developed land in exchange for wetlands and upland habitat which could increase grading and excavation of soils. However, construction-generated pollutants would be temporary and addressed through preparation of a project-specific SWPPP in accordance with the City's Stormwater Standards Manual and the City's Grading Ordinance and would include construction BMPs. The increase in wetlands would further reduce the overall impervious footprint in the project area and would reduce the overall development density of the project area resulting in a decrease in long-term operational pollutants compared to the proposed project. Thus, similar to the proposed project, the Resiliency Optimized Alternative would result in less than significant impacts related to flooding and drainage patterns, water quality and groundwater. Therefore, the Resiliency Optimized Alternative would result in reduced hydrology and water quality impacts, compared to the proposed project.

h. Noise

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of active recreation and low-cost visitor guest accommodations. Compared to the proposed project, the Resiliency Optimized Alternative would result in a reduction in average daily traffic and peak-hour trips on weekdays and weekends due to the reduction in active recreation and low-cost visitor guest accommodations, which would result in a reduction in traffic-related noise. Under this alternative the total area of developed land would be reduced compared to the proposed project because the project area would provide more natural habitat and regional recreation uses and would result in a net reduction in noise from the project area to adjacent noise-sensitive land uses, including wetland habitat near the MHPA and sensitive species.

Compared to the proposed project, the Resiliency Optimized Alternative would result in a reduction in operational noise impacts because this alternative would result in less development and there would be an overall reduction in low-cost visitor guest accommodations. Similar to the proposed project, the Resiliency Optimized Alternative is located outside the airport's 65 dBA CNEL noise contour for the Montgomery-Gibbs Executive Airport and San Diego International Airport and noise compatibility impacts would not occur at any of the proposed land uses. Compared to the proposed project, the Resiliency Optimized Alternative would result in a noise reduction at adjacent noise-sensitive land uses (Mission Bay High School and residences north and west of the project area). This is due to the removal of existing noise-generating uses (Campland and Mission Bay RV Resort) near sensitive receptors and the location of low-cost visitor guest accommodations farther from those sensitive receptors. Noise produced under the Resiliency Optimized Alternative would not exceed the City's noise standards. Similar to the proposed project, proposed future uses under this alternative would be required to comply with the noise level limits included in the City's Municipal Code, Section 59.5.0401. Similar to the proposed project, construction activities associated with the Resiliency Optimized Alternative would have the potential to exceed noise levels of 75 dBA up to 150 feet from construction. With the implementation of Mitigation Measure **MM NOI 5.8-1**, construction noise impacts would be reduced to a less than significant level. In addition, the anticipated types of construction activity and equipment required for construction of the Enhanced Wetlands/Optimized Parkland Alternative would not result in excessive vibration levels. Impacts would be less than significant, similar to the proposed project. Therefore, the Resiliency Optimized Alternative would result in reduced noise impacts, compared to the proposed project.

i. Paleontological Resources

Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of the active recreation and low-cost visitor guest accommodations. Similar to the proposed project, construction activities associated with the Resiliency Optimized Alternative would trigger the thresholds for significance for paleontological resources (i.e., earthwork greater than 1,000 cubic yards in quantity within a high sensitivity paleontological geological unit or earthwork greater than 2,000 cubic yards in quantity within a moderate sensitivity paleontological geological unit). Compliance with the City's Municipal Code, Section 142.0151, would ensure that impacts would be less than significant by requiring paleontological resource monitoring. Therefore, the Resiliency Optimized Alternative would result in similar less than significant paleontological resources impacts as the proposed project.

j. Transportation and Circulation

Compared to the proposed project, the Resiliency Optimized Alternative would result in fewer vehicle trips than those generated under the proposed project due to a reduction in traffic-generated uses on site. Compared to the proposed project, the Resiliency Optimized Alternative would create additional wetland and upland habitat while reducing the amount of active recreation and low-cost visitor guest accommodations. Similar to the proposed project, circulation for the Resiliency Optimized Alternative would include multi-use pathways for pedestrians and bicyclists that would provide connections to the existing facilities and would support policies and goals within the MBPMP to make biking more comfortable and accessible for people of all ages and abilities by providing better-quality bicycle facilities and connections to active recreation uses on site and in the surrounding community. The alternative would also provide similar access to the region-serving high-quality light-rail transit in the project area.

Similar to the proposed project, the Resiliency Optimized Alternative would not conflict with the City's General Plan Mobility Element, City's Mobility Choices Program, and SANDAG's 2021 Regional Plan. Compared to the proposed project, the Resiliency Optimized Alternative would reduce the amount of low-cost visitor guest accommodations. With the reduction of low-cost visitor guest accommodations under this alternative, the service area of similar coastal accessible facilities in the region would expand compared to the proposed project and the driving distance for residents within the region would increase, resulting in an increase in regional VMT compared to the proposed project.

Similar to the proposed project, the Resiliency Optimized Alternative would include the construction of service roads, vehicular access points, and parking would be constructed in accordance with the standards in the San Diego Municipal Code, City's Standard Drawings (City of San Diego 2021c), and City's Street Design Manual (City of San Diego 2017) and with requirements for emergency vehicle access such as the City's fire apparatus access roadway requirements. Overall, the Resiliency Optimized Alternative would result in increased VMT impacts, compared to the proposed project.

8.3.4.3 Relationship to Project Objectives

The Resiliency Optimized Alternative would foster opportunities for members of local Tribal nations to reconnect to De Anza Cove (project objective 2). In addition, the expanded wetland restoration provides an opportunity to increase climate change resiliency from sea level rise impacts (project objective 3). Wetlands provide erosion control and shoreline protection from flooding. Wetlands are also dynamic habitats that are resilient to changes in freshwater flows and would be designed to be adaptable to sea level rise through augmentation, accommodation, vertical accretion, or other habitat management strategies. The Resiliency Optimized Alternative would include additional upland habitat areas that provide resiliency to changes in freshwater flows from altered stormwater regimes. The Resiliency Optimized Alternative would further embrace responsibility and stewardship of the environment by restoring and safeguarding natural habitats within De Anza Cove (project objective 4). In addition, the Resiliency Optimized Alternative would enhance public access and connectivity within De Anza Cove and increase connections to the surrounding communities through the inclusion of the multi-use path which would allow for pedestrians and cyclists to connect with points west, north and east (project objective 6). However, the Resiliency Optimized Alternative would only partially meet project objectives 1 and 5 as it would not fully provide equitable access to De Anza Cove nor fully

diversify active and passive recreational uses because this alternative would reduce the amount of low-cost guest visitor accommodations, open beach, active recreation and regional recreation opportunities compared to the proposed project.

8.4 Environmentally Superior Alternative

CEQA Guidelines, Section 15126.6(e)(2), requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. Table 8-6, Summary of Impacts for Alternatives Compared to the Proposed Project, provides a summary comparison of the alternatives with the proposed project to highlight if the alternatives would result in a similar, greater, or lesser impacts.

Table 8-6. Summary of Impacts for Alternatives Compared to the Proposed Project

Impact	Proposed Project	No Project/ No Build Alternative	Wetlands Optimized Alternative	Enhanced Wetlands/ Optimized Parkland Alternative	Resiliency Optimized Alternative
Land Use	LS	> LS	= LS	= LS	= LS
Air Quality and Odor	LSM	> LS	< LSM	< LSM	< LSM
Biological Resources	LSM	< LS	= LSM	= LSM	= LSM
Greenhouse Gas Emissions	LS	> LS	< LS	< LS	< LS
Hazards and Hazardous Materials	LSM	< LS	= LSM	= LSM	= LSM
Historical, Archaeological, and Tribal Cultural Resources	SU	< LS	= SU	< SU	= SU
Hydrology and Water Quality	LS	> LS	< LS	< LS	< LS
Noise	LSM	> LS	< LSM	< LSM	< LSM
Paleontological Resources	LS	< LS	= LS	= LS	= LS
Transportation/ Circulation	LS	> LS	> LS	> LS	> LS

Notes:
LS = Less than Significant
LSM = Less than Significant with Mitigation Measures
SU = Significant and Unavoidable
> = Greater Than
= = Similar To
< = Less Than

The level of environmental impacts associated with the No Project/No Build Alternative is less than the proposed project, as this alternative would avoid ground disturbance that could result in impacts to subsurface archaeological resources or TCRs and would reduce the project's significant unavoidable impacts on historical, archaeological, and TCRs. Therefore, the No Project/No Build Alternative would be considered

the environmentally superior alternative. According to Section 15126.6 of the CEQA Guidelines, if the No Project Alternative (No Project/No Build Alternative) is selected as the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with the project's goals and objectives, the Enhanced Wetlands/Optimized Parkland Alternative is the environmentally superior alternative for this PEIR.

As discussed above, the No Project/No Build Alternative does not fully meet any of the six project objectives, the Wetlands Optimized Alternative only meets three of the six project objectives, and the Resiliency Optimized and Enhanced Wetlands/Optimized Parkland Alternatives fully meet four of the six project objectives (project objectives 2, 3, 4, and 6). While the Resiliency Optimized Alternative would result in reduced impacts to only four issue areas, the Enhanced Wetlands/Optimized Parkland Alternative would result in reduced impacts to five issue areas: air quality and odor; GHG emissions; historical, archaeological, and TCRs; hydrology and water quality; and noise. All other impacts would remain similar to the proposed project.

Therefore, the Enhanced Wetlands/Optimized Parkland Alternative would result in the greatest reduction in environmental impacts compared to the proposed project and would be considered the environmentally superior alternative.

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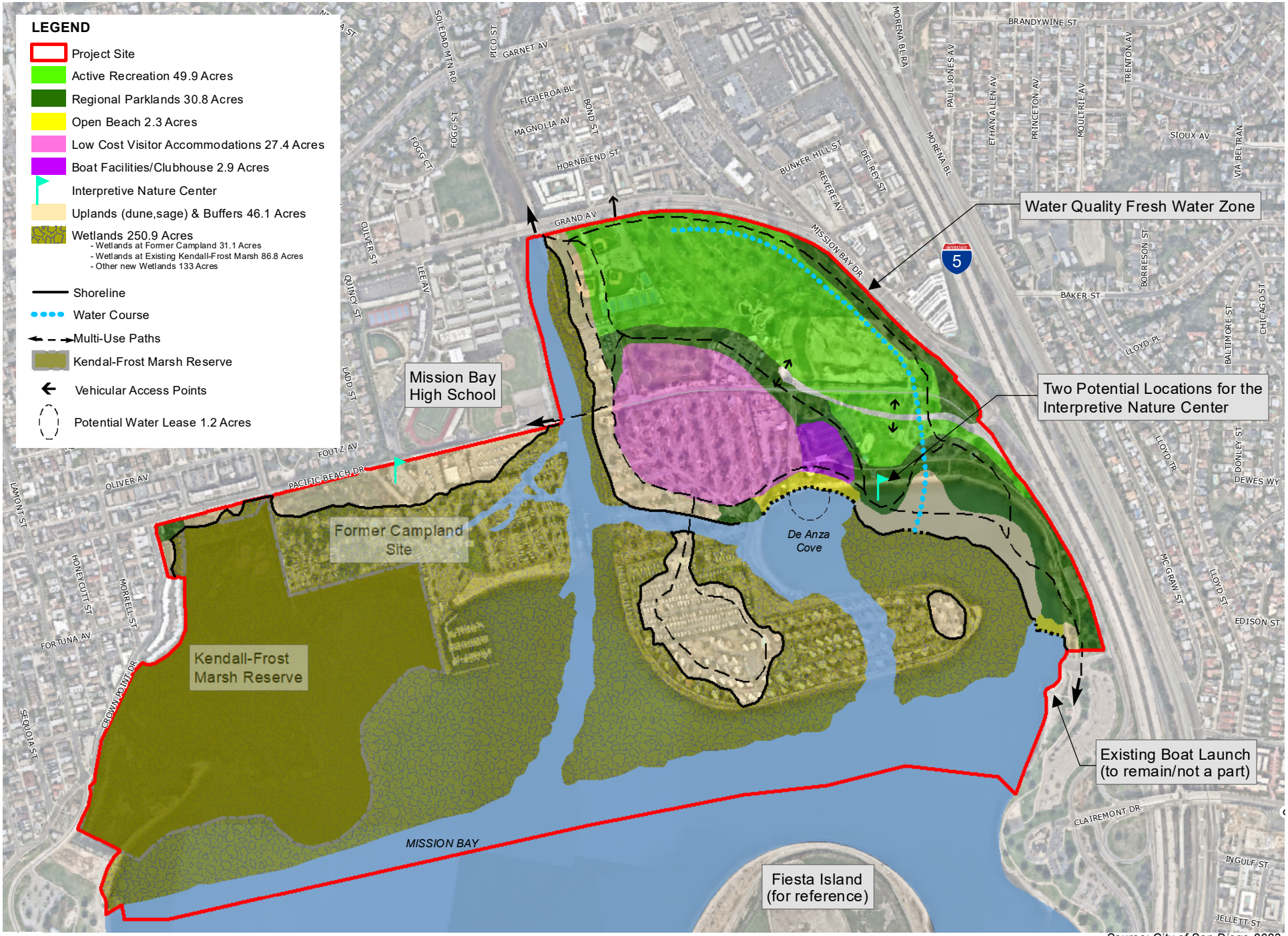

Source: City of San Diego 2023.

Figure 8-1

Wetlands Optimized Alternative

De Anza Natural Amendment to the Mission Bay Park Master Plan

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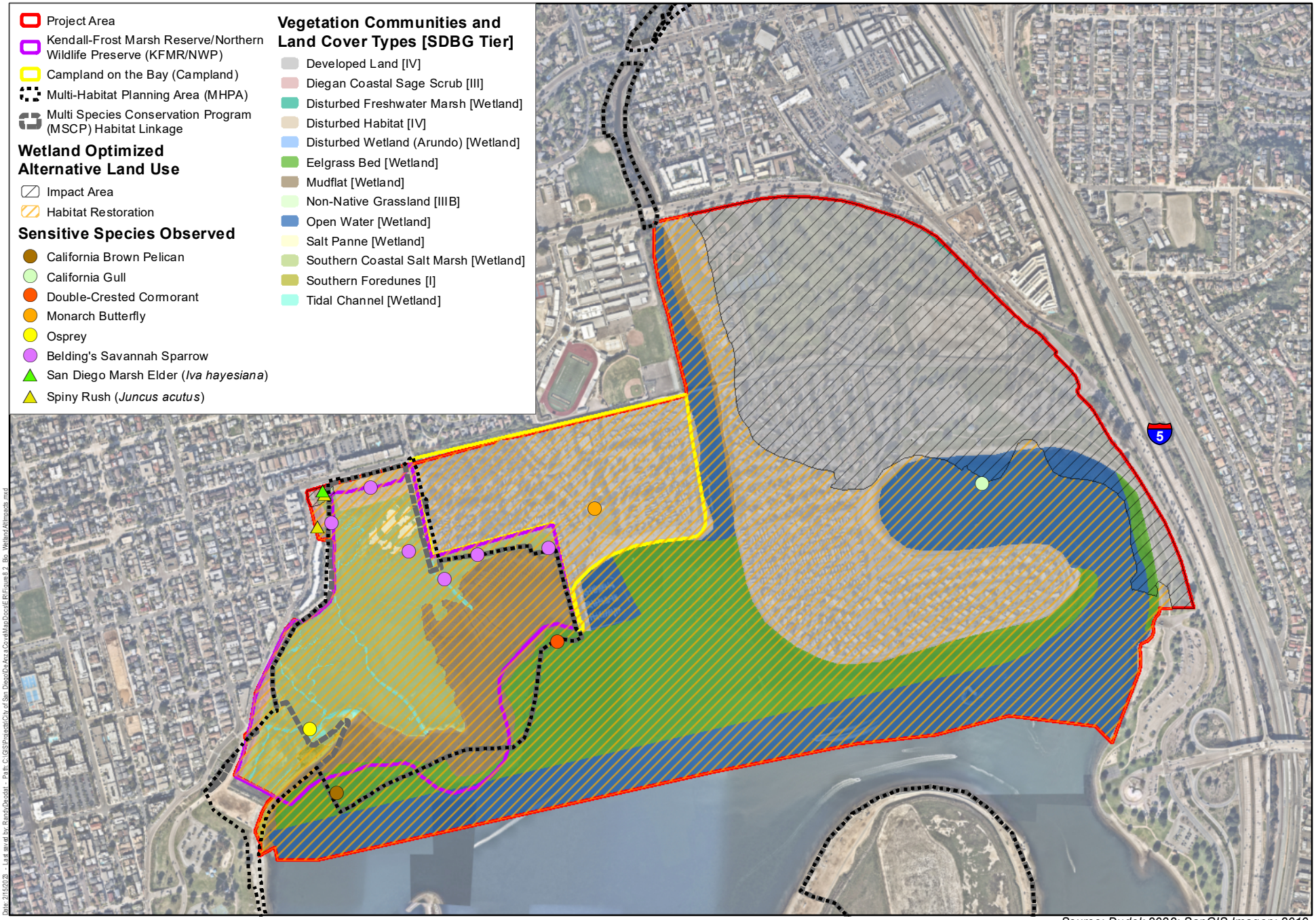

Source: Dudek 2022; SanGIS Imagery 2019.

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Figure 8-2

Impacts to Biological Resources - Wetlands Optimized Alternative

De Anza Natural Amendment to the Mission Bay Park Master Plan

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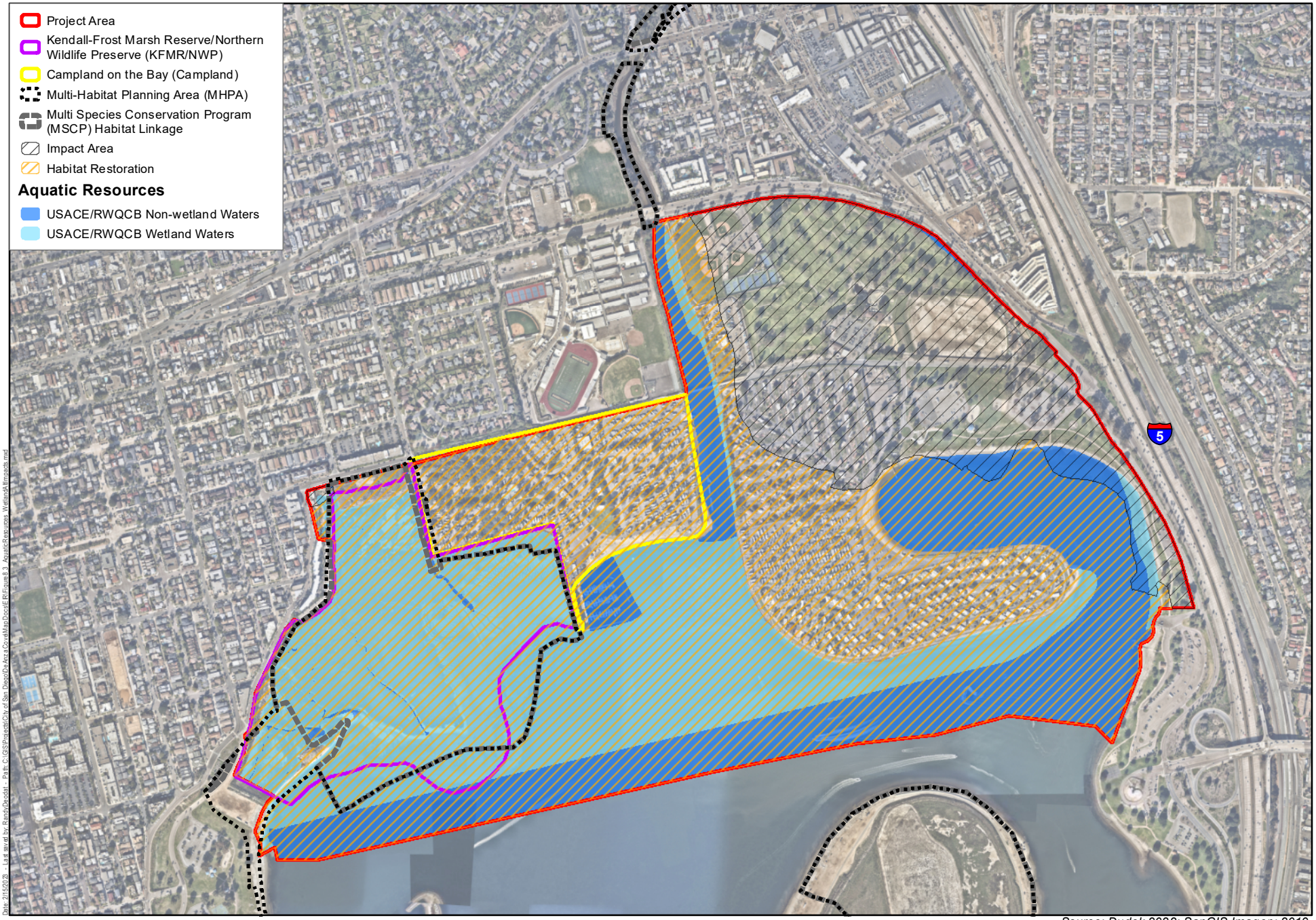

Source: Dudek 2022; SanGIS Imagery 2019.

Figure 8-3

Impacts to Potentially Jurisdictional Aquatic Resources - Wetlands Optimized Alternative

De Anza Natural Amendment to the Mission Bay Park Master Plan

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Source: City of San Diego 2023.

Figure 8-4

Enhanced Wetlands/Optimized Parkland Alternative

De Anza Natural Amendment to the Mission Bay Park Master Plan

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Source: City of San Diego 2023.

Figure 8-5

Resiliency Optimized Alternative

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Chapter 9.0
References Cited

Summary

City of San Diego. 2020. Transportation Study Manual.

City of San Diego. 2021a. Climate Resilient SD Plan. Adopted by City Council on December 14.

City of San Diego 2021b. Standard Drawings. Accessed March 2023. https://www.sandiego.gov/sites/default/files/standard_drawings_2021_edition.pdf.

Chapter 1.0, Introduction

City of San Diego. 1990. Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning Department.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 1997. City of San Diego MSCP Subarea Plan. Final. Prepared by the Community and Economic Development Department. March.

City of San Diego. 2005. Environmental Impact Report Guidelines. Revised September 2002. Updated May and December. Accessed March 2023. https://www.sandiego.gov/sites/default/files/legacy/cip/pdf/stadiumeir/2005-12_eir-guidelines-update.pdf.

City of San Diego. 2008a. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2008b. Program Environmental Impact Report for the City of San Diego General Plan. Final. Accessed March 2023. https://www.sandiego.gov/planning/genplan/documents/peir.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Climate Resilient SD Plan. Adopted by City Council on December 14.

City of San Diego. 2022a. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

City of San Diego. 2022b. San Diego Municipal Code. Accessed March 2023. https://www.sandiego.gov/city-clerk/officialdocs/municipal-code.

City of San Diego. 2022c. City of San Diego Climate Action Plan. Accessed March 2023. https://www.sandiego.gov/sustainability/climate-action-plan.

UC San Diego (University of California, San Diego). 2022. "Kendall-Frost Marsh Reserve." Natural Reserve System. Accessed March 2023. https://nrs.ucsd.edu/reserves/kendall.html.

Chapter 2.0, Environmental Setting

CARB (California Air Resources Board). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. October. Accessed March 2023. https://ww2.arb.ca.gov/resources/documents/guidance-documents.

CARB. 2021. California Greenhouse Gas Emissions for 2000 to 2019 – Trends of Emissions and Other Indicators. July 28. Accessed March 2023. https://ww3.arb.ca.gov/cc/inventory/pubs/reports/2000_2019/ghg_inventory_trends_00-19.pdf.

CARB. 2022. "iADAM: Air Quality Data Statistics." Accessed March 2023. http://arb.ca.gov/adam.

CARB. 2023a. "Glossary of Air Pollutant Terms." Accessed March 2023. https://ww2.arb.ca.gov/glossary.

CARB. 2023b. "GHG Inventory Glossary." Accessed March 2023. https://ww2.arb.ca.gov/ghg-inventory-glossary.

CDFW (California Department of Fish and Wildlife). 2018. California Natural Diversity Database (CNDDB), RareFind 5, commercial version. Accessed March 2023. https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

City of San Diego. 2009. "Very High Fire Severity Zones San Diego" [map]. March 16. Accessed March 2023. https://www.sandiego.gov/sites/default/files/legacy/fire/pdf/maps/fhsz_citymap.pdf.

City of San Diego. 2018. "Biology Guidelines." In Land Development Manual.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022a. City of San Diego Climate Action Plan. Accessed March 2023. https://www.sandiego.gov/sustainability/climate-action-plan.

City of San Diego. 2022b. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

Clement, Dorene, and Thad M. Van Bueren. 1993. Historic Architectural Survey Report and Historic Study Report for the Caltrans District 11 Office Complex Old Town San Diego. Report prepared

by Caltrans District 11. Unpublished report on file at South Coastal Information Center, San Diego State University.

CNPS (California Native Plant Society). 2018. Inventory of Rare, Threatened, and Endangered Plants of California. Online edition, version 8-03 0.39. Sacramento, California: CNPS, Rare Plant Program. Accessed March 2023. http://www.rareplants.cnps.org.

CNRA (California Natural Resources Agency). 2018. Safeguarding California Plan: 2018 Update. January. Accessed March 2023. https://www.slc.ca.gov/sea-level-rise/safeguarding-california-plan-2018-update/.

County of San Diego. 2009. County of San Diego Guidelines for Determining Significance, Paleontological Resources. Land Use and Environment Group, Department of Planning and Land Use, Department of Public Works.

County of San Diego. 2017. San Diego County Multi-Jurisdictional Hazard Mitigation Plan. October.

Crane, Clare. 1991. The Pueblo Lands: San Diego's Hispanic Heritage. Journal of San Diego History 37 (2):105–127.

Deméré, T.A., and Walsh, S.L. 1993. County of San Diego Paleontological Resources. Prepared for the San Diego Planning Commission.

Dumas, Jane. 2011. Interview with Kumeyaay Elder.

Felton, D.L. 1996. Archaeological Site Form for Site CA-SDI-14291H and Site Form for CA-SDI-14,293. On file at South Coastal Information Center, San Diego State University.

FEMA (Federal Emergency Management Agency). 2019. Flood Map Service Center, San Diego County, California. Accessed March 2023. https://msc.fema.gov/portal/home.

Gallegos, D., and C. Kyle. 1988. Five Thousand Years of Maritime Subsistence at Ballast Point Prehistoric Site SDI-48 (W-164), San Diego, California. San Diego, California: WESTEC Services.

IPCC (Intergovernmental Panel on Climate Change). 1995. Second Assessment Report.

IPCC. 2007. “Summary for Policymakers.” In Climate Change 2007: The Physical Science Basis, edited by S. Solomon, D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M. Tignor, and H.L. Miller, 1–18. A report of Working Group I of the IPCC. New York, New York: Cambridge University Press. Accessed March 2023. http://www.ipcc.ch/pdf/assessment-report/ar4/wg1/ar4-wg1-spm.pdf.

IPCC. 2014. Climate Change 2014: Synthesis Report. Accessed March 2023. http://www.ipcc.ch/pdf/assessment-report/ar5/syr/SYR_AR5_FINAL_full.pdf.

Kennedy, M.P. 1975. Geology of the San Diego Metropolitan Area, California. Section A, Western San Diego Metropolitan Area. California Division of Mines and Geology, Bulletin 200: 9–39.

Kennedy, M.P., and S.S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Map Series 1:100,000 scale, Map No. 3.

Kroeber, A. 1925. Handbook of the Indians of California. Washington DC: Smithsonian Institution.

LOSSAN (Los Angeles – San Diego – San Luis Obispo Rail Corridor). 2022. "LOSSAN Rail Corridor Agency." Accessed March 2023. https://www.octa.net/LOSSAN-Rail-Corridor-Agency/Overview/.

NOAA (National Oceanic and Atmospheric Administration). 2018. Wrecks and Obstructions Database.

OHP (Office of Historic Preservation). 1995. Instructions for Recording Cultural Resources. March. Accessed March 2023. https://ohp.parks.ca.gov/pages/1054/files/manual95.pdf.

Pourade, Richard F. 1963. The History of San Diego: The Silver Dons. San Diego Union-Tribune Publishing Company. San Diego, California.

Qiancheng, M. 1998. "Greenhouse Gases: Refining the Role of Carbon Dioxide." National Aeronautics and Space Administration Science Briefs. March. Accessed March 2023. https://www.giss.nasa.gov/research//briefs/1998_ma_01/.

RWQCB (Regional Water Quality Control Board). 2021. Water Quality Control Plan for the San Diego Basin. As amended on September 1.

San Diego State University. 2011. "San Diego Mexican & Chicano History." Accessed March 2023. https://chicanohistory.sdsu.edu/.

SDAPCD (San Diego County Air Pollution Control District). 2010. Airport Land Use Compatibility Plan for Montgomery-Gibbs Executive Airport.

SDCRAA. 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

SDAPCD. 2015. 2015 Annual Air Quality Monitoring Network Plan. https://www.sdapcd.org/content/dam/sdapcd/documents/monitoring/2015-Network-Report.pdf.

SDAPCD. 2022. "Attainment Status." Accessed March 2023. https://www.sdapcd.org/content/sdapcd/planning/attainment-status.html.

SDCRAA (San Diego County Regional Airport Authority). 2010. Montgomery-Gibbs Executive Airport – Airport Land Use Compatibility Plan. Adopted January 25. Amended December 20. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

SDCRAA. 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

SDNHM (San Diego Natural History Museum). 2018. Paleontological Records Search, De Anza Cove Revitalization Project. Unpublished Records Search Results Letter from the San Diego Natural History Museum.

SWRCB (State Water Resources Control Board). 2021. "California Water Boards' Annual Performance Report – Fiscal Year 2020–21." Accessed March 2023. https://www.waterboards.ca.gov/about_us/performance_report_2021/index.html.

SWRCB. 2022. "2020–2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." Accessed March 2023. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

UC San Diego (University of California, San Diego). 2010. "Floral, Avian, Herpetological, and Mammal Species Lists." Compiled by R. Wolf. May (birds, mammals, and herps) and August (plants).

USDA (U.S. Department of Agriculture). 2018. Web Soil Survey. USDA Natural Resources Conservation Service, Soil Survey Staff. Accessed March 2023. http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

USEPA (U.S. Environmental Impact Report). 2016. Glossary of Climate Change Terms. Last updated September 29. Accessed March 2023. https://19january2017snapshot.epa.gov/climatechange/glossary-climate-change-terms_.html.

USEPA. 2022a. "Air Data: Air Quality Data Collected at Outdoor Monitors Across the US." Last updated October 13. Accessed March 2023. http://www.epa.gov/airdata/.

USEPA. 2022b. "Fast Facts – National Level U.S. Greenhouse Gas Inventory: 1990–2020." April. Accessed March 2023. https://www.epa.gov/system/files/documents/2022-04/fastfacts-1990-2020.pdf.

USEPA. 2022c. "Criteria Air Pollutants." Last updated on August 9. Accessed March 2023. https://www.epa.gov/criteria-air-pollutants.

USFWS (U.S. Fish and Wildlife Service). 2018. "Critical Habitat and Occurrence Data" [map]. Accessed March 2023. http://www.fws.gov/data.

Chapter 3.0, Project Description

No references cited.

Chapter 4.0, Regulatory Framework

CARB (California Air Resources Board). 2000. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. Accessed March 2023. https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf.

CARB. 2008. Climate Change Proposed Scoping Plan: A Framework for Change. October 2008; approved December 12, 2008. Accessed March 2023. http://www.arb.ca.gov/cc/scopingplan/document/psp.pdf.

CARB. 2011. Advanced Clean Cars Program. Accessed March 2023. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about.

CARB. 2016. "Ambient Air Quality Standards." May 5. Accessed March 2023. http://www.arb.ca.gov/research/aaqs/aaqs2.pdf.

CARB. 2017. The 2017 Climate Change Scoping Plan Update—The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target. January 20. Accessed March 2023. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CARB. 2022. 2022 Scoping Plan Update. Accessed March 2023. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents#:~:text=The%202022%20Scoping%20Plan%20Update%20focuses%20on%20outcomes%20needed%20to,economic%2C%20environmental%2C%20energy%20security%2C.

CCC (California Coastal Commission). 1994. Procedural Guidance for the Review of Wetland Projects in California's Coastal Zone.

City of San Diego. 1990. Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning Department.

City of San Diego. 1997. City of San Diego MSCP Subarea Plan. Final. Prepared by the Community and Economic Development Department. March.

City of San Diego. 2008. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2009. Official Very High Fire Hazard Severity Map. Accessed March 2023. https://www.sandiego.gov/fire/services/brush/severityzones.

City of San Diego. 2010. San Diego Municipal Code, Chapter 14, Article 2, Division 7, Section 142.0710, Air Contaminant Regulations. January 1. Accessed March 2023. http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art02Division07.pdf.

City of San Diego. 2013. Bicycle Master Plan.

City of San Diego. 2015a. "Land Use and Community Planning Element." In City of San Diego General Plan. June. Accessed March 2023. https://www.sandiego.gov/planning/work/general-plan.

City of San Diego 2015b. "Noise Element." In City of San Diego General Plan. June 29. Accessed March 2023. https://www.sandiego.gov/planning/work/general-plan.

City of San Diego. 2020a. Transportation Study Manual. September 29. Accessed March 2023. https://www.sandiego.gov/sites/default/files/10-transportation-study-manual.pdf.

City of San Diego. 2020b. Complete Communities: Housing Solutions and Mobility Choices. Accessed March 2023. https://www.sandiego.gov/complete-communities/mobility-choices.

City of San Diego. 2021a. "Recreation Element." In City of San Diego General Plan. August. Accessed March 2023. https://www.sandiego.gov/planning/work/general-plan.

City of San Diego. 2021b. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021c. Land Development Code. 2021 update adopted by City Council on December 13. Accessed March 2023. https://www.sandiego.gov/planning/work/land-development-code.

City of San Diego. 2021d. Stormwater Standards Manual. Effective February 2016. Updated May. Accessed March 2023. https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual#SWstandards2018.

City of San Diego 2021e. "Public Facilities, Services, and Safety Element." In City of San Diego General Plan. December. Accessed March 2023. https://www.sandiego.gov/planning/work/general-plan.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

CNRA (California Natural Resources Agency). 2021. Climate Change Adaptation Strategy.

County of San Diego. 2011. Operational Area Hazardous Materials Area Plan.

County of San Diego. 2017. Multi-Jurisdictional Hazard Mitigation Plan.

County of San Diego. 2022. Emergency Operations Plan.

SANDAG (San Diego Association of Governments). 2010. Riding to 2050: San Diego Regional Bike Plan.

SANDAG. 2021. 2021 Regional Plan. December. Accessed March 2023. https://www.sdforward.com/mobility-planning/2021-regional-plan.

SDAPCD (San Diego County Air Pollution Control District). 1976. Regulation IV: Prohibitions; Rule 51: Nuisance.

SDAPCD. 2009. Regulation IV: Prohibitions; Rule 55: Fugitive Dust.

SDAPCD. 2015. Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.

SDAPCD. 2016. 2016 Revision of the Regional Air Quality Strategy for San Diego County. December. Accessed March 2023. https://www.sdapcd.org/content/sdapcd/planning.html.

SDAPCD. 2018. Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants – New Source Review.

USEPA (U.S. Environmental Protection Agency). 1981. Noise in America: the Extent of the Noise Problem. September.

USEPA. 2022. "NAAQS Table." Last updated April 5. Accessed March 2023. https://www.epa.gov/criteria-air-pollutants/naaqs-table.

Chapter 5.0, Environmental Analysis

Section 5.1, Land Use

City of San Diego. 1990. Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning Department.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 1997. City of San Diego MSCP Subarea Plan. Final. Prepared by the Community and Economic Development Department. March.

City of San Diego. 2008. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2018. "Biology Guidelines." In Land Development Manual.

City of San Diego. 2019. Pacific Beach Community Plan and Local Coastal Program Land Use Plan.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Land Development Code. 2021 update adopted by City Council on December 13. Accessed March 2023. https://www.sandiego.gov/planning/work/land-development-code.

City of San Diego. 2021c. Climate Resilient SD Plan. Adopted by City Council on December 14.

City of San Diego. 2021d. Balboa Avenue Station Area Specific Plan.

City of San Diego. 2022a. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

City of San Diego. 2022b. Environmentally Sensitive Lands Regulations. Accessed March 2023. https://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art03Division01.pdf.

City of San Diego. 2022c. City of San Diego Climate Action Plan. Accessed March 2023. https://www.sandiego.gov/sustainability/climate-action-plan.

DOC (California Department of Conservation). 2022. Farmland Mapping and Monitoring Program. Accessed March 2023. https://maps.conservation.ca.gov/DLRP/CIFF/.

SANDAG (San Diego Association of Governments). 2021. 2021 Regional Plan. December. Accessed March 2023. https://www.sdforward.com/mobility-planning/2021-regional-plan.

SDCRAA (San Diego County Regional Airport Authority). 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

SDCRAA. 2018. California Airport Land Use Planning Handbook.

Section 5.2, Air Quality and Odor

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

SDAPCD (San Diego County Air Pollution Control District). 1976. Regulation IV: Prohibitions; Rule 51: Nuisance.

SDAPCD. 2009. Regulation IV: Prohibitions; Rule 55: Fugitive Dust.

SDAPCD. 2015. Regulation IV: Prohibitions; Rule 67.0.1: Architectural Coatings.

SDAPCD. 2020a. Regulation IV: Prohibitions; Rule 20.2: New Source Review Non-Major Stationary Sources.

SDAPCD. 2020b. Ozone Maintenance Plan.

SDAPCD. 2022. Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments. Accessed March 2023. https://www.sdapcd.org/content/dam/sdapcd/documents/permits/air-toxics/Hot-Spots-Guidelines.pdf.

OEHHA (California Office of Environmental Health Hazard Assessment). 2015. Air Toxics Hot Spot Program Risk Assessment Guidelines – Guidance Manual for Preparation of Health Risk Assessments.

Section 5.3, Biological Resources

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 1997. City of San Diego MSCP Subarea Plan. Final. Prepared by the Community and Economic Development Department. March.

City of San Diego. 2018. "Biology Guidelines." In Land Development Manual.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Stormwater Standards Manual. Effective February 2016. Updated May. Accessed March 2023. https://www.sandiego.gov/planning/programs/landdevcode/landevmanual#SWstandards2018.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

Merkel & Associates. 2017. Hydroacoustic Analysis in Support of the Mission Bay Master Plan Update – Fiesta Island Amendment Project. October 2, 2017.

Section 5.4, Greenhouse Gas Emissions

CARB (California Air Resources Board). 2022. 2022 Scoping Plan Update. Final. November 16. Accessed March 2023. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Climate Resilient SD Plan. Adopted by City Council on December 14.

City of San Diego. 2022a. City of San Diego Climate Action Plan. Accessed March 2023. https://www.sandiego.gov/sustainability/climate-action-plan.

City of San Diego. 2022b. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

City of San Diego. 2022c. Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects. Memorandum from Rebecca Malone, AICP, Environmental Policy Program Manager, Planning Department. June 17.

Section 5.5, Hazards and Hazardous Materials

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2009. Official Very High Fire Hazard Severity Map. Accessed March 2023. https://www.sandiego.gov/fire/services/brush/severityzones.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022a. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

County of San Diego. 2022b. San Diego County Emergency Operations Plan. September. Accessed March 2023. https://www.sandiegocounty.gov/content/sdc/oes/emergency_management/oes_jl_oparea.html.

SDCRAA (San Diego County Regional Airport Authority). 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

Section 5.6, Historical, Archaeological, and Tribal Cultural Resources

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022a. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

City of San Diego. 2022b. "Historical Resources Guidelines." City of San Diego Land Development Manual. Adopted September 28, 1999; amended April 30. Accessed March 2023. https://www.sandiego.gov/development-services/industry/landdevcode/landdevmanual.

Section 5.7, Hydrology and Water Quality

CNRA (California Natural Resources Agency). 2018. State of California Sea Level Rise Guidance: 2018 Updated. Accessed March 2023. https://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2016. Landscape Standards. Accessed March 2023. https://www.sandiego.gov/sites/default/files/dsdldc_landscapestandards_2016-04-05.pdf.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Stormwater Standards Manual. Effective February 2016. Updated May. Accessed March 2023. https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual#SWstandards2018.

City of San Diego. 2021c. Climate Resiliency SD. Accessed January 2023. https://www.sandiego.gov/sites/default/files/crsd_final_plan_with_appendices.pdf

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

FEMA (Federal Emergency Management Agency). 2019. Flood Map Service Center, San Diego County, California. Accessed March 2023. https://msc.fema.gov/portal/home.

RWQCB (Regional Water Quality Control Board). 2021. Water Quality Control Plan for the San Diego Basin. As amended September 1.

SWRCB (State Water Resources Control Board). 2022. 2020–2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report). Accessed March 2023. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

Section 5.8, Noise

Caltrans (California Department of Transportation). 2004. Transportation- and Construction-Induced Vibration Guidance Manual. Contract No. 43A0049, Task Order No. 18. June.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego 2015. "Noise Element." In City of San Diego General Plan. June 29. Accessed March 2023. https://www.sandiego.gov/planning/work/general-plan.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

FHWA (Federal Highway Administration). 2008. Roadway Construction Noise Model. Version 1.1.

FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. FTA Report No. 0123. Prepared by John A. Volpe, National Transportation Systems Center. September. Accessed March 2023. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

SDCRAA (San Diego County Regional Airport Authority). 2010. Montgomery Field – Airport Land Use Compatibility Plan. Adopted January 25. Amended December 20. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

SDCRAA. 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

Section 5.9, Paleontological Resources

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2021. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

Kennedy, M.P. 1975. Geology of the San Diego Metropolitan Area, California. Section A, Western San Diego Metropolitan Area. California Division of Mines and Geology, Bulletin 200: 9–39.

Kennedy, M.P., and S.S. Tan. 2008. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Geological Survey, Regional Map Series 1:100,000 scale, Map No. 3.

Section 5.10, Transportation and Circulation

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2017. Street Design Manual. March. Accessed March 2023. https://www.sandiego.gov/planning/programs/transportation/library/stdesign.

City of San Diego. 2020. Transportation Impact Study Manual. Draft. June 10. Accessed March 2023. https://www.sandiego.gov/sites/default/files/draft_city_of_san_diego_tsm_062020.pdf

City of San Diego 2021. Standard Drawings. Accessed March 2023. https://www.sandiego.gov/sites/default/files/standard_drawings_2021_edition.pdf.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

Chapter 6.0, Cumulative Impacts

City of San Diego. 2008a. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2008b. Program Environmental Impact Report for the City of San Diego General Plan. Final. Accessed March 2023. https://www.sandiego.gov/planning/genplan/documents/peir.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

Chapter 7.0, Other Mandatory Discussion Areas

CalRecycle (California Department of Resources Recycling and Recovery). 2019. Miramar West Miramar Sanitary Landfill Site Activity Details. Accessed March 2023. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1795?siteID=2868.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 2008. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2019. Pacific Beach Community Plan and Local Coastal Program Land Use Plan.

City of San Diego 2021a. Water Facility Design Guidelines. Revised January. Accessed March 2023. https://www.sandiego.gov/sites/default/files/water-facility-design-guidelines-2021.pdf.

City of San Diego. 2021b. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2022. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

DOC (Department of Conservation). 2018a. California Department of Conservation Farmland Mapping and Monitoring Program Map. Accessed March 2023. https://www.conservation.ca.gov/dlrp/fmmp.

DOC. 2018b. "DOC Maps: Mines and Mineral Resources." Accessed March 2023. https://maps.conservation.ca.gov/mineralresources/.

FEMA (Federal Emergency Management Agency). 2019. Flood Map Service Center, San Diego County, California. Accessed March 2023. https://msc.fema.gov/portal/home.

Chapter 8.0, Alternatives

City of San Diego. 1990. Mission Bay Park Natural Resource Management Plan. Prepared for the Park and Recreation Department by the Development and Environmental Planning Department.

City of San Diego. 1994. Mission Bay Master Plan Update Environmental Impact Report.

City of San Diego. 1997. City of San Diego MSCP Subarea Plan. Final. Prepared by the Community and Economic Development Department. March.

City of San Diego. 2008. City of San Diego General Plan. March 10. Accessed March 2023. https://www.sandiego.gov/planning/genplan.

City of San Diego. 2017. Street Design Manual. March. Accessed March 2023. https://www.sandiego.gov/planning/programs/transportation/library/stdesign.

City of San Diego. 2019. Pacific Beach Community Plan and Local Coastal Program Land Use Plan.

City of San Diego. 2021a. Mission Bay Park Master Plan. Update. Adopted August 2, 1994. Amended August 1, 1995; May 13, 1997; July 9, 2002, and November 23. Accessed March 2023. https://www.sandiego.gov/sites/default/files/000_mission_bay_park_master_plan_2021.pdf.

City of San Diego. 2021b. Stormwater Standards Manual. Effective February 2016. Updated May. Accessed March 2023. https://www.sandiego.gov/planning/programs/landdevcode/landdevmanual#SWstandards2018.

City of San Diego 2021c. Standard Drawings. Accessed March 2023. https://www.sandiego.gov/sites/default/files/standard_drawings_2021_edition.pdf.

City of San Diego. 2022a. Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects. Memorandum from Rebecca Malone, AICP, Environmental Policy Program Manager, Planning Department. June 17.

City of San Diego. 2022b. City of San Diego Climate Action Plan. Accessed March 2023. https://www.sandiego.gov/sustainability/climate-action-plan.

City of San Diego. 2022c. CEQA Significance Determination Thresholds. September. Accessed March 2023. https://www.sandiego.gov/sites/default/files/september_2022_ceqa_thresholds_final.pdf.

DOC (California Department of Conservation). 2022. Farmland Mapping and Monitoring Program. Accessed March 2023. https://maps.conservation.ca.gov/DLRP/CIFF/.

ReWild. 2018. ReWild Mission Bay: Wetlands Restoration Feasibility Study Report. February. Accessed March 2023. https://rewildmissionbay.org/resources.

SANDAG (San Diego Association of Governments). 2021. 2021 Regional Plan. December. Accessed March 2023. https://www.sdforward.com/mobility-planning/2021-regional-plan.

SDAPCD (San Diego Air Pollution Control District). 2020. Ozone Maintenance Plan.

SDCRAA (San Diego County Regional Airport Authority). 2014. San Diego International Airport – Airport Land Use Compatibility Plan. Adopted April 3. Amended May 1. Accessed March 2023. https://www.san.org/Airport-Projects/Land-Use-Compatibility#7121296-alucps.

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