

7 COMPREHENSIVE LAND USE UPDATE PEIR SUBJECT AREAS REQUIRING NO CHANGE IN ANALYSIS

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15163, the following subject areas contained within the 2011 Comprehensive Land Use Update (CLUU) Program Environmental Impact Report (PEIR) do not require additional analysis and are not addressed further in this Supplemental Program Environmental Impact Report (SPEIR). These subject areas include issues that do not need additional analysis because the Focused General Plan Update (FGPU) would not result in changes affecting the significance conclusion in the 2011 CLUU PEIR. For these areas, there have been no substantial changes in circumstances or new information available that requires the need for supplemental review. These subject areas include:

- Aesthetics (Scenic Vistas, Scenic Resources, Light and Glare)
- Agriculture
- Biological Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials (Airports and Emergency Response Plans)
- Hydrology and Water Quality
- Land Use (Physical Division of the Community)
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Utilities and Service Systems
- Wildfire
- Cumulative impacts related to the above issues

7.1 AESTHETICS (SCENIC VISTAS, SCENIC RESOURCES, LIGHT AND GLARE)

Aesthetics is discussed in Chapter 4.1 in the 2011 CLUU PEIR.

Issue 1: Scenic vista

The 2011 CLUU PEIR concluded that scenic vista impacts associated with implementation of the CLUU would be *less than significant* despite proposed changes permitting higher-intensity land uses, which could affect scenic views of the surrounding areas. Implementation of adopted General Plan goals, policies, and actions intended to protect scenic resources and preserve open space areas, as well as compliance with development standards, would reduce potential impacts to scenic vistas.

Issue 2: Scenic resources

As noted in the 2011 CLUU PEIR, there are no State-designated scenic highways in the Planning Area. Therefore, implementation of the regulatory changes would have *no impact* on scenic resources within a scenic highway.

Issue 4: Light and glare

The 2011 CLUU PEIR noted that although development under the CLUU could increase the amount of light and glare through the installation of new exterior lighting on new residential and commercial development, compliance with General Plan policies and development standards would result in *less than significant* impacts.

FGPU

Issue 1: Scenic vista

The FGPU proposes changes within existing urbanized corridors, consistent with the analysis of the CLUU. Future development consistent with the FGPU would be subject to design guidelines, development standards, and General Plan policies regarding the protection of scenic resources within the City. This would be verified during site plan review at the time of project application. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

Issue 2: Scenic resources

Consistent with the conditions at the time of the 2011 PEIR, no scenic State highways exist within the Planning Area as of the preparation of the FGPU SPEIR. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

Issue 4: Light and Glare

Future development associated with the FGPU would be subject to General Plan policies and development standards regarding the installation of lighting and shielding. This would be verified during site plan review at the time of project application. The FGPU proposes higher-intensity development within urbanized corridors, consistent with the CLUU. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.2 AGRICULTURE

Agriculture is discussed in Chapter 4.2 in the 2011 CLUU PEIR.

The 2011 CLUU PEIR concluded that there would be no impacts from implementation of the CLUU as related to a conflict with the existing zoning for agricultural use or with land under a Williamson Act contract. No farmland exists in the Planning Area that is classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and there are no Williamson Act contracts in the Planning Area. Similarly, there would be no impacts from loss of, or conflict with, existing zoning of forest land, as the Planning Area does not contain any forest land, timberland, or land zoned for timberland production. The CLUU did not result in any rezoning of these lands, for the same reason.

FGPU

The Planning Area is fully developed and heavily urbanized; no change in existing conditions since the 2011 CLUU PEIR has occurred that would change the results of the 2011 analysis under this resource. The FGPU does not propose any changes to existing urban agricultural zoning or to City policies regulating urban agricultural land. Consistent with the 2011 CLUU PEIR, policies and measures supportive of urban agriculture development and protection in the adopted General Plan and Climate Action Plan (CAP) would be applicable to development under the FGPU. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.3 BIOLOGICAL RESOURCES

Biological Resources are discussed in Chapter 4.4 in the 2011 CLUU PEIR.

Issue 1: Candidate, sensitive, special status species

The 2011 CLUU PEIR concluded that the CLUU involved changes to land uses on sites that are currently developed, and these changes would have *no impact* to the habitats of any candidate, sensitive, or special status species.

Issue 2: Riparian habitat or sensitive natural community

The 2011 CLUU PEIR concluded that buildout under the CLUU would result in *less than significant* impacts to sensitive natural communities because the changes proposed in the CLUU would only affect the parts of the Planning Area that are currently developed.

The goals, policies, and standards included in the General Plan (Open Space and Agriculture Element) and Land Use Code would ensure the protection and preservation of sensitive habitat areas, including sensitive and special status species, sensitive habitats, and wetlands (Goals OS-2.0, OS-2.2, OS-2.3, and OS-2.8).

Issue 3: Wetlands

The 2011 CLUU PEIR found that the CLUU would have a *less than significant* impact to wetlands. Potential future development on parcels adjacent to undeveloped parcels that could potentially contain jurisdictional wetlands and waters would potentially affect these resources; however, the 2011 CLUU PEIR concluded that consultation with the U.S. Army Corps of Engineers (USACE) on a project-by-project basis would ensure that impacts were mitigated.

Furthermore, the 2011 CLUU PEIR concluded that the type of mitigation associated with future development for project-specific impacts would be determined during the environmental review process and would include biological buffers and wetland setbacks to protect existing wetlands, particularly along the Paradise Creek corridor. Future proposed projects potentially affecting wetlands and “waters” would comply with the U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, and USACE “no net loss” policy, such that proposed mitigation ensures that there is no net loss of wetland habitat values or acreages.

Issue 4: Movement of native residents, wildlife corridors, and wildlife nursery sites

The 2011 CLUU PEIR found that buildout under the CLUU would not impede migration or affect native residents, migratory fish, wildlife species, or established native resident or migratory wildlife corridors, or impede the use of native wildlife nurseries. This is because the CLUU would only affect the parts of the Planning Area that are currently developed and would not result in the development of undeveloped or natural areas that are used by migratory species. Therefore, the CLUU was determined to have *no impact*.

Issue 5: Conflict with local, regional, or State habitat conservation plan or natural community conservation plan

The 2011 CLUU PEIR concluded that the CLUU would not conflict with the provisions of an adopted local, regional, or State habitat conservation plan since no such plan regulates land in National City. It was noted that Lincoln Acres is subject to the Multiple Species Conservation Program and the Biological Mitigation Ordinance. Although development proposed in that area that would affect sensitive habitat would be required to comply with these regulations, the CLUU does not propose any changes to land within the Lincoln Acres boundary. Therefore, the CLUU was found to have *no impact* from conflicts with a biological conservation plan.

FGPU

The FGPU only includes changes in land use intensity within the Focus Areas, which are developed parcels in the boundaries of National City and would therefore not affect the Planning Area's existing biological conditions. Consistent with the 2011 CLUU PEIR, future buildout under the FGPU would continue to be reviewed by the City to be consistent with adopted General Plan policies in the Open Space and Agricultural Element meant to protect biological resources. Discretionary projects would continue to be reviewed for potential impacts to biological resources, as required under CEQA. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.4 ENERGY

Energy was not covered specifically in its own chapter in the 2011 CLUU PEIR because it was not included in the CEQA Guidelines Appendix G significance thresholds at that time. Energy impacts are, however, discussed in the 2011 CLUU PEIR Chapter 6.0 Section C Significant Irreversible Changes (2) Commitment of Resources.

As disclosed in Chapter 6.0 of the 2011 PEIR, development allowed under the CLUU was found to irretrievably commit nonrenewable resources to the construction and maintenance of buildings, infrastructure, and roadways. Buildout of the CLUU was found to represent a long-term commitment to the consumption of fossil fuels, natural gas, and gasoline. Increased energy demands would be attributed to construction, lighting, heating, and cooling of residences, and transportation of people within, to, and from the Planning Area. Goals CS-1, CS-6, CS-7, and the associated policies of the Conservation and Sustainability Element, along with the implementation measures of the CAP, were identified to promote energy conservation, which could minimize or incrementally reduce the consumption of these resources. Therefore, impacts of the CLUU on energy resources were found to be *less than significant*.

FGPU

Energy is covered in the 2022 CEQA Appendix G guidelines under Section VI. The significance thresholds ask:

Would the project:

- a) *Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*
- b) *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Since the FGPU does not cover site-specific development projects, impacts to energy resources can only be analyzed based on the projected buildout of the proposed land use changes at the program level. Generally, an increase in buildout capacity would increase demands on energy resources; however, individual development projects would comply with the City's General Design and Development Regulations (Municipal Code Title 18 Division 4) and mandatory energy requirements such as California Green Building Standards Code (CALGreen) and the California Energy Code (Title 24, Part 6 of the California Code of Regulations), along with applicable greenhouse gas reduction measures in the City's CAP, which collectively contain energy efficiency requirements for all new developments. The FGPU encourages the development of a multimodal, high-density series of corridors that would introduce greater energy efficiency in its structures, in the way the modes by which the community travels by, and through its CAP policies. Under the FGPU, vehicle miles traveled (VMT) per capita would be less in 2050 (8.21) than under buildout of the adopted CLUU (8.33).

Buildout of the FGPU is not anticipated to require fuel or energy consumption above the typical rates utilized for construction, as it includes relatively small incremental increases in allowed residential and commercial development in six discrete areas within the Planning Area over the next 30 years.

Furthermore, the FGPU includes an update to the City's CAP, which provides a number of strategies for reduced consumption of energy within the Planning Area, including, but not limit to:

- Participation in a Community Choice Energy (CCE) program;
- Continuing to offer clean energy financing programs to encourage energy efficiency retrofits in existing buildings;
- Providing no- or low-cost weatherization improvements for low-income households;
- Supporting the adoption of a building electrification code;
- Encouraging the use of the Free Resources and Energy Business Evaluation program to help improve energy and water efficiency;
- Encouraging private development to exceed energy efficiency requirements of CalGreen; and
- Encouraging LEED certification for all new commercial and industrial buildings.

Therefore, at the program level, it can be concluded that the FGPU would not result in any new significant or substantially increased adverse impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources beyond those previously identified in the 2011 CLUU PEIR.

7.5 GEOLOGY AND SOILS

Geology and Soils are discussed in Chapter 4.6 in the 2011 CLUU PEIR.

Issue 1: Risk, loss, injury or death involving rupture, seismic ground shaking, liquefaction, and landslides

The 2011 CLUU PEIR found that the CLUU would have *no impact* related to risk of loss, injury, or death associated with ground rupture since active faults around the Planning Area do not present a risk of ground rupture.

Compliance with Title 15 of the City Municipal Code (California Building Code [CBC]) and General Plan policies (Safety Element Policy S-1.1 through S-1.4 and S-5.1 through S-5.6) ensuring emergency preparation, the risk of loss, injury or death associated with seismic ground shaking to people and structures was found to be *less than significant*.

Risks from liquefaction would be analyzed as part of the review process for site-specific developments. Building permit applications are reviewed by the City for conformance with the CBC, including Section 1610, Soil Lateral Loads, which requires design that resists lateral soil loads. Under Policy S-1.4 under Goal S-1 of the Safety Element, the City would require compliance with recognized standards for protection from seismic hazards, including liquefaction. Therefore, with the required compliance with these procedures, the risk of loss, injury, or death associated with liquefaction for development associated with implementation of the CLUU was found to be *less than significant*.

The 2011 CLUU PEIR found that compliance with Policy S-1.5 in the Safety Element (which would minimize safety hazards such as landslides through specific development regulations for steep slopes greater than 25 percent grade), impacts related to risk of loss, injury, or death associated with landslides, mudslides, or other similar hazards associated with implementation of the CLUU would be *less than significant*.

Issue 2: Soil erosion and loss of topsoil

The 2011 CLUU PEIR found that the CLUU would not alter conditions in such a way as to increase the likelihood of soil erosion through site-specific development compliance with the Safety Element

policies (S-1.5) and Conservation and Sustainability Element policies (CS-3.3, CS-8.3). In addition, the City's Grading Ordinance (Municipal Code Section 15.70) includes standards for erosion control, in accordance with the CBC.

Therefore, the 2011 CLUU PEIR concluded that with compliance with these policies and regulations, the risk of soil erosion associated with implementation of the CLUU would be *less than significant*.

Issue 3: Expansive soils

The 2011 CLUU PEIR also noted that new development resulting from projected buildout of the CLUU would comply with CBC Section 1610, Municipal Code Section 15.60.060, and policies from the Safety Element (Policy S-1, S-1.4). Therefore, the 2011 CLUU PEIR concluded that the CLUU's impact on risks from expansive soils would be *less than significant*.

Issue 4: Septic tanks

Municipal Code Section 14.06.020 prohibits the installation of septic tanks or other devices for disposal of sewage in the City where there is an available sewer system within 200 feet. All development proposed under the CLUU would be located within 200 feet of the available sewer system and would be prohibited from installing a septic system. Therefore, the 2011 CLUU PEIR concluded that the CLUU would have *no impact* on the capability of soils to support the use of septic systems.

FGPU

The FGPU would be consistent with the 2011 CLUU PEIR findings, as new development under the FGPU would be subject to consistency review with all of the measures, policies, and standards identified in the discussion above. The FGPU is consistent with the scope of the CLUU in that it proposes changes to the General Plan and Municipal Code to encourage development in specific infill locations within the City, and therefore, impacts associated with buildout of the FGPU would not deviate substantially from the 2011 analysis. No substantial new geologic hazards or changes in existing circumstances related to the above topics have occurred since the 2011 CLUU PEIR certification. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.6 HAZARDS AND HAZARDOUS MATERIALS

Hazards are discussed in Chapter 4.7 in the 2011 CLUU PEIR.

Issue 6: Adopted emergency response plan

The 2011 CLUU PEIR concluded that the CLUU would have a *less than significant* impact related to the impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan because it would comply with the City's Emergency Operations Plan (June 2010), which includes an evacuation plan and general goals and policies. Goals and Policies of the Safety Element also require continued effective emergency response and procedures to minimize the loss of life and property during and following emergencies and disasters, which would ensure that development under the CLUU would not interfere with established emergency policies.

Issue 7: Wildland fires

See discussion below under Section 7.14 Wildfire.

FGPU

Issue 6: Adopted emergency response plan

The FGPU would update Safety Element policies related to emergency responses in a way that would not interfere with an adopted emergency response plan or emergency evacuation plan. Site-specific development under the FGPU would be subject to consistency review with these policies. In addition, circulation network updates would be developed per CBC access standards and in consultation with local emergency response providers to ensure that implementation of adopted emergency response

plans is not inhibited by a change in the physical infrastructure of the local transportation network. Furthermore, VMT per capita would be reduced under the FGPU as compared to the CLUU and therefore would not result in any additional vehicular delay for emergency service providers. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts to the above issues beyond those previously identified in the 2011 CLUU PEIR.

Issue 7: Wildland fires

As described in Section 7.14 Wildfire, below, the Planning Area is located in an urban zone that does not pose a severe wildfire threat to the structures in the area.¹ The Focus Areas are therefore located in low wildfire risk areas and would not expose people or structures, either directly or indirectly, to significant risk of loss, injury, or death involving wildland fires, which is consistent with the 2011 CLUU PEIR significance conclusion despite the change in the threshold language.

7.7 HYDROLOGY AND WATER QUALITY

Hydrology and Water Quality are discussed in Chapter 4.8 in the 2011 CLUU PEIR.

Issue 1: Water Quality

Since the 2011 CLUU PEIR found the Planning Area has been largely developed, buildout of the CLUU was determined not to result in the creation of substantial new areas of impervious surface; development occurring under the CLUU would comply with the Standard Urban Stormwater Mitigation Plan, General Plan policies related to stormwater management and low impact development practices; and the Stormwater Management and Discharge Control Ordinance (Chapter 14.22 of the Municipal Code) would protect water quality in the Planning Area. Therefore, the 2011 CLUU PEIR found that the CLUU would have *less than significant* impacts on water quality.

Issue 2: Groundwater

Projections from the 2005 Urban Water Management Plan indicated that there was sufficient supply to meet projected demand in the Sweetwater Authority service area, including National City, through 2030, and growth under the CLUU would not substantially deplete groundwater supplies. Therefore, the 2011 CLUU PEIR found that the CLUU would have *less than significant* impacts on groundwater supply in the Planning Area.

Issue 3, 4: Drainage pattern and runoff

Since the Planning Area is already almost fully built out, the 2011 CLUU PEIR found that development that would occur under the CLUU was found not likely to result in the creation of substantially more impervious surface area. Specific development and redevelopment occurring with buildout of the CLUU would be required to comply with flood damage prevention measures contained in the Municipal Code, erosion and runoff control provisions contained in the City’s Standard Urban Stormwater Mitigation Plan, and the City’s Stormwater Management and Discharge Control Ordinance. These measures restrict development in areas of special flood hazard and control erosion, which would in turn limit and control alteration of existing drainage patterns. Adherence to local regulations ensured that, in the course of development under the CLUU, watercourses and drainage patterns would not be altered in a manner that would significantly increase the rate or amount of either runoff or erosion, thereby causing on-site or off-site flooding.

Overall, the 2011 CLUU PEIR determined that runoff, erosion, or on-site or off-site flooding impacts associated with the CLUU would be *less than significant*.

Issue 5, 6, 7: 100-year flood hazard area, flooding, inundation

The CLUU included policies to minimize hazards relating to flooding and inundation. The CAP also included measures to reduce water use and increase water efficiency, effectively improving hydrology

¹ National City, Safety Element Update, Figure SE-8 Wildfire Risk Map, March 2021

and water quality within National City. Any development or redevelopment under the CLUU is required to comply with Municipal Code provisions and demonstrate that encroachment would not result in an increase in base flood levels. Overall, the majority of storm drainage facilities in the City are adequate to prevent property damage in the event of a 100-year storm. Development under the CLUU was found to alleviate existing 100-year storm flow capacity constraints, although the 2011 CLUU PEIR concluded that without detailed, site-specific storm flow calculations it was not possible to determine whether specific constraints would be eliminated with the implementation of low impact development techniques and stormwater management best management practices (BMPs) alone.

The 2011 CLUU PEIR concluded that with compliance with existing regulations and proposed policies, the CLUU would result in *less than significant* impacts to flooding and inundation.

FGPU

Issue 1: Water Quality

Consistent with the 2011 CLUU PEIR, buildout under the FGPU would occur in urbanized, developed infill areas within the Focus Areas and therefore would not introduce substantial amounts of impervious surfaces that could lead to runoff and worsening of water quality. Site-specific development would be subject to all applicable regulations as described in the 2011 CLUU PEIR, including the Stormwater Management and Discharge Control Ordinance, which enforces National Pollutant Discharge Elimination System (NPDES) requirements. Since the 2011 CLUU PEIR analysis, a new municipal separate storm sewer system (MS4) Permit was issued by the San Diego Regional Water Quality Control Board (Order No. R9-2013-0001, as amended by R9-2015-0001). The 2008 Jurisdictional Runoff Management Program (JRMP) was also updated in 2013 in response to the updated MS4 Permit. The JRMP is the City of National City's approach to improving water quality in its creeks, rivers, and San Diego Bay by reducing discharges of pollutants to the MS4 through BMP programs that development under the FGPU would be subject to.

Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts to compliance with water quality standards or waste discharge requirements, or to water quality beyond those previously identified in the 2011 CLUU PEIR.

Issue 2: Groundwater

Consistent with the CLUU, the buildout of the FGPU would largely occur within infill areas in urbanized corridors and therefore would not result in an increase of impervious surfaces in a way that would impact groundwater recharge throughout the Planning Area. Development under the FGPU would not impact recharge through open space areas, such as near or within the Sweetwater River or Paradise Creek. Since the Sweet Water Authority supplies water from a diverse mix of sources other than groundwater and has projected resiliency of its water supply through 2045 per its Urban Water Management Plan (UWMP), it can be concluded that the demand for water from FGPU buildout would not substantially impact groundwater supplies. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

Issue 3, 4: Drainage, erosion, and runoff/inundation

Buildout of the FGPU would occur in Focus Areas along urbanized corridors; there is no risk of impacts above and beyond those identified in the 2011 CLUU PEIR. Development would be subject to applicable regulations and be required to include design measures or BMPs to reduce risk associated with these hazards. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

Issue 5: Conflict with Water quality plan

The 2022 CEQA Guidelines include a new threshold, (e): "conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan." The City has a number of

water quality programs to help maintain water quality standards per the Clean Water Act as prescribed by NPDES permit program. These programs are implemented in compliance with the 2020 Best Management Practice (BMP) Design Manual, maintained by the Storm Water Division and the JRMP , maintained by the Engineering/Public Works Department. The JRMP includes the Construction Management Program, which identifies the pollutants that may exist at active construction sites and presents a range of BMPs and supporting administrative processes designed to eliminate or reduce them.

The City requires all projects that involve ground disturbance or soil-disturbing activities that can potentially generate pollutants in stormwater runoff to submit an Erosion and Sediment Control Plan (ESCP) prior to the issuance of a permit. The ESCP is checked by the Engineering Division for compliance with the City's BMP Manual and the MS4 Permit using the ESCP Checklist. The City also requires projects subject to the Construction General Permit (CGP) to provide proof of coverage before construction work may begin. Note that the CGP requires projects to complete Storm Water Pollution Prevention Plans (SWPPPs), which include components similar to the ESCP. When a project is subject to the CGP, the City reviews the ESCP rather than the SWPPP. The City reviews the ESCP rather than the SWPPP because the ESCP specifically addresses the City's BMP requirements, while the SWPPP is a much longer document that includes both BMPs and a significant amount of additional information required by the CGP. Projects too small to require grading permits generally disturb minimal soil and are short in duration. These projects are notified of their obligation to implement BMPs via the City's Construction BMP Handout.²

All construction sites are required to implement the City's minimum construction BMP requirements, which can be found in the City's BMP Manual. These requirements apply to small and large construction projects that disturb land.³ Therefore, future development projects under the FGPU would not conflict with any water quality plans or standards and would have a *less than significant* impact.

7.8 LAND USE

Land Use is discussed in Chapter 4.9 Land Use in the 2011 PEIR.

Issue 1: Physical division of the community

The 2011 CLUU PEIR concluded that impacts related to physically dividing an established community would be *less than significant* since the CLUU is designed as a programmatic document that directs future growth to provide for cohesion and connectivity within an established community, and community involvement in development projects. The CLUU sets forth goals, objectives, policies, and actions intended to foster greater connectivity, and to prevent new development from dividing existing uses and includes general design standards to ensure that all development is compatible with existing and future development, and protects the use and enjoyment of neighboring properties, consistent with the General Plan. In addition, new development under the CLUU would occur primarily on sites either already developed and underutilized, or in close proximity to existing development, and therefore would not divide the community.

FGPU

The FGPU includes updates to the Land Use and Transportation Elements and proposes rezoning to encourage higher-density developments improvements in established urbanized Focus Areas. The FGPU also proposes circulation network improvements throughout the Planning Area that would encourage the development of a more cohesive and well-connected city. No circulation network changes would be proposed that would bisect the community, such as a rail line or highway. Land uses

² National City, Jurisdictional Runoff Management Program, June 2020
<https://www.nationalcityca.gov/home/showpublisheddocument/25037/637286133402730000>

³ National City, Stormwater Program, Construction Best Management Practices (BMPs), <https://www.nationalcityca.gov/government/engineering-public-works/engineering-division/storm-water-program/construction-best-management-practices> (Accessed October 3, 2022)

would be consistent with existing uses and would not introduce new or changed uses that would result in the physical division of the community such as a band of industrial uses. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.9 MINERAL RESOURCES

Mineral Resources are discussed in Chapter 4.6 in the 2011 PEIR.

The 2011 CLUU PEIR noted that impacts related to the availability of mineral resource exploration and extraction, associated with implementation of the CLUU, would be *less than significant* since the only identified mineral resources in National City are salt ponds located within the South San Diego Bay Unit of the San Diego National Wildlife Refuge. This area is controlled by the Unified Port of San Diego Master Plan, which would not be affected by the CLUU.

FGPU

The FGPU would not impact the exploration and extraction of mineral resources, consistent with the conclusion of the CLUU PEIR. The FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.10 NOISE

Noise is discussed in Chapter 4.10 in the 2011 CLUU PEIR.

Issue area 1: Airport land use plan

The 2011 CLUU PEIR noted that aircraft operations to and from San Diego International Airport (SDIA) and the Naval Air Station North Island (NASNI) generate intermittent noise when passing over National City. Noise generated by these flights, although audible and noticeable in quiet areas above other ambient noise sources, is a minor contributor to daily average noise levels in the Planning Area. Therefore, the CLUU would have *no impact* on exposing people residing or working in the project area to excessive noise levels.

FGPU

As noted in Chapter 4.7 Noise, portions of the Planning Area appear to be within the Airport Influence Area (AIA) for SDIA, Brown Field, and NASNI. The Airport Land Use Commission consistency determination noted that the Planning Area is not within any AIA noise contours. It is not anticipated that future development consistent with the FGPU would expose people residing or working in the Planning Area to excessive noise levels, since flight noise is a minor contributor to daily noise levels in the Planning Area. Therefore, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

Therefore, the FGPU would not result in the exposure of sensitive receptors to excessive airport noise, the significance conclusion at the time of the CLUU is consistent with that of the FGPU under this threshold, and the FGPU will have *no impact* in exposing those residing or working in the Planning Area relative to excessive noise.

7.11 POPULATION AND HOUSING

Population and Housing are discussed in Chapter 4.11 in the 2011 CLUU PEIR.

The 2011 CLUU PEIR found that implementation of the CLUU would result in population increases. However, this Planning Area growth was expected and was accommodated and planned for through the CLUU. Growth was projected to be consistent with buildout of the CLUU, which is based on assumptions about known potential development projects and the land use designations included in the General

Plan land use map and zones included in the zoning map. Therefore, the 2011 CLUU PEIR concluded that the impact of unexpected population growth associated with implementation of the CLUU would be *less than significant*.

FGPU

The FGPU would not induce a substantial unplanned population, nor would it displace a substantial number of existing people or housing. The FGPU would update adopted zoning within selected Focus Areas to encourage the development of higher-density land uses and housing to accommodate projected populations in 2050. The projections of population as a result of the FGPU are consistent with regional projections from the San Diego Association of Governments (SANDAG). Future development under the FGPU would be subject to individual project-level review once proposed, to mitigate and avoid displacement of people and housing. At the program level, the FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.

7.12 PUBLIC SERVICES

Public Services are discussed in Chapter 4.12 in the 2011 CLUU PEIR.

Issue Area 1: Maintenance of acceptable service ratios, response times, other performance objectives

The 2011 CLUU PEIR concluded that implementation of the CLUU would result in *less than significant* impacts on the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives related to public services.

The 2011 CLUU PEIR analyzed the provision of new fire, police, and school facilities within the analysis of impacts from the proposed institutional land use designation. Programmatic impacts associated with the provision of new or physically altered police, fire, and school facilities resulting from implementation of the CLUU were determined to be *less than significant*.

FGPU

The FGPU would encourage development of housing and mixed-use development to accommodate the projected population anticipated at buildout in 2050. On a programmatic level, the FGPU would be consistent with the 2011 CLUU PEIR finding of a *less than significant* impact on the environment from the construction of new or physically altered government facilities as it would not propose the construction of such institutional uses. Therefore, the FGPU would not result in adverse impacts above and beyond what was previously analyzed in the 2011 CLUU PEIR.

7.13 RECREATION

Recreation is discussed in Chapter 4.12 Public Services and Recreation in the 2011 CLUU PEIR. As of the 2022 CEQA Guidelines, Recreation is discussed in Appendix G Section XVI Recreation.

Issue area 1,2: Increased used and construction or expansion

The 2011 CLUU PEIR concluded that implementation of the CLUU would result in *less than significant* impacts despite an increase in the Planning Area's population because the City's Open Space Element contains policies (OS-5.2, OS-5.4, OS-5.8, OS-5.9) meant to ensure continued maintenance of existing facilities and the provision of additional park land to serve the growing population. Furthermore, future proposals for new park facilities would be subject to additional CEQA review.

FGPU

While the FGPU would not directly result in development, future buildout under the FGPU would only slightly increase demand on existing recreational resources since the FGPU would increase future housing by approximately 600 units (and approximately 1,900 persons) over the Adopted CLUU. In addition, future development would be required to be consistent with General Plan policies (e.g., Open Space and Agriculture Element Policy OS-5.2, OS-5.3, OS-5.4, OS-5.11) that require the continued maintenance and provision of recreational facilities within the Planning Area. This is consistent with the findings of the 2011 CLUU PEIR. The FGPU would increase open space zoning within the 18th Street Focus Area to expand National City's existing park and open space inventory to accommodate the Planning Area's current demand, as well as the future needs that will result from the increased density. In addition, the Objective Design Standards would provide guidance on locating open spaces to be a positive asset and encourage social interaction within new housing development. Therefore, at this program level, the FGPU would have a *less than significant* impact on the deterioration of recreational facilities and on the provision of new or expanded facilities that might have an adverse physical effect on the environment. Therefore, the FGPU would not result in adverse impacts above and beyond what was previously analyzed in the 2011 CLUU PEIR.

7.14 UTILITIES AND SERVICE SYSTEMS

Utilities and Public Services are discussed in Chapter 4.14 in the 2011 CLUU PEIR. As of the 2022 CEQA Guidelines, Utilities are discussed in Appendix G Issue XIX Utilities and Service Systems, and Public Services are discussed under Section XV Public Services. The analysis below for the FGPU discusses potential impacts related to the 2011 thresholds, in addition to the expanded 2022 thresholds.

Issue 1: Water supply

The 2011 CLUU PEIR concluded that implementation of the CLUU would result in *less than significant* impacts to water supplies. The Sweetwater Authority undertook a Water Supply Assessment for the CLUU and updated its water demand projections during this assessment, concluding that the purchase of imported water from the Metropolitan Water District would be sufficient to meet the projected needs through 2030. In addition, multiple policies within the General Plan (CS-3.3, CS-3.4, CS-4.0, CS-4.1, CS-4.2, CS-4.3, CS-4.4, and OS-5.6) and Municipal Code were identified to help the City reduce demand for water through green practices and conservation. Further, the proposed General Plan and Municipal Code changes contained policies and measures to ensure sufficient services and facilities by promoting coordination between service providers and establishing funding mechanisms for upgrades (LU-8.1, LU-8.4, S-3.3, C-7, CS-3, and CS-3.2). Additionally, Chapter 4, Section 18.44.180 of the Land Use Code establishes Water Efficient Landscape Regulations, which set standards for the design, installation, and maintenance of water efficient landscaping as directed by California State law.

Issue 2: New water treatment facilities or expansion

The 2011 CLUU PEIR found that impacts on water treatment facilities associated with implementation of the CLUU would be *less than significant*. The analysis found that the demands from buildout of the CLUU would be covered by the proposed additional water infrastructure already planned by the Sweetwater Authority in 2010. Therefore, the CLUU was determined not to require expansion of water treatment facilities that could cause environmental impacts.

Issue 3: Landfill capacity

The 2011 CLUU PEIR found that buildout as a result of the CLUU would have a *less than significant* impact to landfill capacity and solid waste services, including a *less than significant* impact in relation to generating solid waste in excess of State and local standards. The analysis determined that the Planning Area would not exceed either the permitted throughput or physical capacity of landfills serving National City through 2030, through the implementation of goals and policies of the General Plan (CS-9.1 through CS-9.6, LU-8.1, and ZC-2) and Recycling Ordinance. Policies CS-9.1 through CS-9.6 under the

Conservation Element describe solid waste reduction and recycling efforts to reduce waste being funneled into landfills. Policy LU-8.1 describes the requirement that new development, including infill projects, provide fair share contributions toward the costs of the public facilities, services, and infrastructure necessary to serve the development, including solid waste. Implementation measure ZC-2 requires the City to amend the Recycling Ordinance to include mandatory recycling requirements for nonresidential uses and composting requirements for large industrial food service providers, landscape operations, and other appropriate uses. All construction would be required under Municipal Code Section 15.80.050 through 15.80.100 to divert waste from construction and demolition or have their deposit forfeited.

Issue 4: Solid waste and recycling regulations

The 2011 CLUU PEIR found that the CLUU would not conflict with applicable statutes and regulations and, as such, the associated impacts would be *less than significant*. The 2011 CLUU PEIR determined that the CLUU would be served by a landfill with sufficient capacity through 2030. National City has adopted a Source Reduction and Recycling Element, a Household Hazardous Waste Element, and a Non-Disposal Facility Element in compliance with Assembly Bill 939, the California Integrated Waste Management Act of 1989. The City's General Plan policies, goals (CS-9, CS-9.2, CS-9.3, CS-9.4, CS-9.5, CS-9.6, and ZC-2), and ordinances also would divert wastes to recycling centers and encourage composting and reuse.

Compliance with the programs and policies related to waste reduction would be sufficient to ensure that future development in the Planning Area would not compromise the City's ability to meet or perform better than the State-mandated target. Policy LU-8.1 would also require new development to provide fair share contributions toward costs of public facilities, services, and infrastructure, including for services like solid waste.

In addition, the CAP would include programs and policies that incentivize resident participation in green waste recycling programs and encourage waste audits and waste reduction plans for existing and new commercial development.

FGPU

Issue 2: Water supply

The region's 2020 UWMP presents the San Diego County Water Authority's water reliability assessments from 2025 through 2045. The assessment takes into consideration the region's growth using SANDAG's Series 14 Regional Growth Forecast, which takes into consideration regional growth through 2050. Consistent with the UWMP Act requirements, each assessment compares total projected water supply and demands over the next 20 years in five-year increments under a normal water year, single dry year, and multiple dry years. The reliability assessment results demonstrate that, even when making conservative assumptions about the availability of dry year supplies from the Metropolitan Water District, the San Diego region's water resource mix is drought resilient.

Because the specific distribution and timing of projected development that could be permitted under the FGPU through 2050 is not known, the specific locations for and quantity of future water supply demand cannot be predicted. Therefore, the potential environmental impacts that future projects may have on water demand cannot be adequately estimated or evaluated at this time. However, as noted above, it is expected based on the current 2020 UWMP,⁴ that the City will be able to meet projected demand under the FGPU in normal, dry, and multiple dry years to 2045. Furthermore, the City will coordinate with the Sweetwater Authority to ensure that the next UWMP update accounts for additional density permitted under the FGPU update buildout projections. Through construction of the

⁴ Sweetwater Authority, 2020 Urban Water Management Plan, (April 2021), <https://www.sweetwater.org/DocumentCenter/View/2594/2020-Urban-Water-Management-Plan-PDF>

facilities recommended in the UWMP, the City ensures that the potable water supplies and distribution system can support all future development.

Also, prior to project approval, future proposed projects would be required to undergo CEQA review and, if applicable, to comply with all federal, State, and local water supply regulations including Senate Bills 610 and 221 (which determine if a project would be required to complete a Water Supply Assessment prior to project approval). Also, the City would require all new development to comply with all drought and water conservation requirements set forth under State and local regulations.

Furthermore, the City's adopted 2011 General Plan includes goals and policies regarding water use, conservation and efficiency policies (as noted above) that would help ensure that adequate water supplies are available to serve existing and planned development and are listed in above. No change in these conservation policies would result from adoption of the FGPU. The CAP update also includes additional water conversation-based strategies (WW-1.1 through WW-1.5), which would further serve to ensure adequate supply.

Therefore, the FGPU would not result in adverse impacts above and beyond what was previously analyzed in the 2011 CLUU PEIR.

Issues 1 and 3: Relocation or expansion of utilities, wastewater capacity

The FGPU would encourage infill residential and mixed-use development through updates to zoning and other Municipal Code provisions. The zoning updates would result in approximately 600 additional dwelling units above the adopted General Plan buildout plus an additional 199,000 square feet of commercial uses within mixed-use development. Additional development capacity under the FGPU would be concentrated in six specified Focus Areas, all located within the existing urbanized areas of the City. These areas are largely already covered with impervious surfaces and are currently served by stormwater, sewer, water, and energy infrastructure, as well as various communication facilities; however, some of the City's built areas have existing infrastructure deficiencies that would require capacity improvements to serve the existing and projected population within the Focus Areas.

The FGPU does not propose new stormwater, water, sewer collection or wastewater treatment facilities, or energy or communications infrastructure; however, future development projects implemented within the Planning Area may require the installation of upgraded or expanded facilities, which would be determined on a project-specific basis. As individual development projects are initiated under the FGPU, site-specific studies would be required to address the condition and capacity of the existing infrastructure and to identify necessary upgrades. Because future development would be consistent with the existing urban growth patterns of the community, and the necessary improvements to the stormwater, wastewater, water, energy, and communications infrastructure would be standard practice for new development.

Furthermore, all such future facilities within the Planning Area would be required to comply with the City's Municipal Code regulations regarding water, stormwater, sewers, and wastewater facilities, along with adopted General Plan policies as noted above, and would be subject to a separate environmental review at the time design plans are available. All goals and policies related to energy conservation and green building measures would remain the same under the FGPU; however, new development would now also be subject to the latest, more stringent, Title 24 energy requirements for new construction, in addition to City policies implemented through the CAP that require energy conservation measures and waste reduction. Therefore, through policy adherence and regulatory compliance, impacts related to the relocation or construction of new public utilities would be less than significant. This finding is consistent with the 2011 CLUU PEIR. The FGPU would not result in a substantial increase in the severity of impacts from that described in the 2011 CLUU PEIR.

Issues 4 and 5: Solid waste capacity and regulations

Buildout of the FGPU would be subject to the goals, policies, and ordinances regarding solid waste that were cited above in the 2011 CLUU PEIR. Chapter 9.52 of the National City Municipal Code mandates a recycling program, and Chapter 15.80 requires waste diversion from construction of residential and commercial projects. Furthermore, the CAP update includes measures targeted at waste reduction, including composting and recycling, in strategy SW-1.1 through SW-1.8. Overall, the FGPU would not impact the solid waste capacity of landfills within the Planning Area or be out of compliance with applicable regulations on a programmatic level. Site-specific development would be subject to individual review for code, policy and CAP compliance, and CEQA, as applicable. Therefore, the FGPU would not result in adverse impacts above and beyond what was previously analyzed in the 2011 CLUU PEIR.

7.15 WILDFIRE

The 2011 CLUU PEIR covered impacts related to wildland fires in Chapter 4.7 Hazards under significance threshold (h): “Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.” As of the 2022 CEQA Guidelines, Wildfire is discussed in Appendix G Issue XX Wildfire.

Development in areas identified as having a high fire risk would be at risk of wildland fires. “Wildland fires” describe any non-structure fires that occur in vegetation and natural fuels and most often begin in urban or rural areas. The 2011 CLUU PEIR noted that most of the Planning Area has only a moderate fire threat; however, there is high fire threat in the southeast part of the Planning Area, east of National City Boulevard and south of 24th Street, including portions of the Olivewood, Las Palmas, and Lincoln Acres neighborhoods, and the Plaza Bonita District. Although most of the Planning Area covered by the CLUU is in an unzoned/urban wildfire severity zone, some adjacent areas were identified as “very high” for wildfire risk. Risk factors in the Planning Area included older structures that have a higher risk of causing fires; pockets of vegetation between developed areas and in the hills within the eastern areas of the Planning Area, and a higher population of minors and seniors, who are associated with greater evacuation needs. Implementation of the CLUU was determined in the 2011 CLUU PEIR to have *less than significant* impacts relative to wildland fire safety since projected buildout would replace older facilities with new facilities that would comply with modern building code requirements, such as improvements as fire sprinkler systems and fire alarms. In addition, the Safety Element also included goals and policies concerning fire safety and evacuation, including policies that were intended to reduce risks from structural fire, fire-related emergencies, and maintaining sufficient fire response coverage and resources.

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The FGPU would increase the number of structures in the Planning Area through rezoning to encourage new, higher-density development. The Focus Area corridors are located in urbanized portions of the Planning Area, which are not located near any high-risk wildfire hazard areas. Similar to the CLUU, development under the FGPU would replace older facilities and reduce risks associated with fire and fire-emergencies. The FGPU would not result in any new significant or substantially increased adverse impacts beyond those previously identified in the 2011 CLUU PEIR.