

March 2022 | Initial Study

# Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit

*Prepared for:*

**City of San Diego**  
Planning Department  
9485 Aero Drive  
San Diego, CA 92123

## ***Acronyms and Abbreviations***

---

2008 City of San Diego General Plan	General Plan
2018 Community Plan	2018 Midway-Pacific Highway Community Plan
2018 PEIR	2018 Midway-Pacific Highway Community Plan Update
	Revised Final Program Environmental Impact Report
AB	Assembly Bill
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
BMP	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFC	California Fire Code
CFR	Code of Federal Regulations
City	City of San Diego
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CP area	Midway-Pacific Highway Community Planning area
CPU	Community Plan Update
dba	A-weighted decibel
DIF	Development Impact Fees
GHG	greenhouse gas
I-	Interstate
IFS	Impact Fee Study
IS	Initial Study
LDC	Land Development Code
Ldn	day-night average sound level
Leq	equivalent continuous sound level
MHPA	Multi-Habitat Planning Area
MMRP	Mitigation Monitoring and Reporting Program
MSCP	Multiple Species Conservation Program
MTS	San Diego Metropolitan Transit System
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO <sub>x</sub>	oxides of nitrogen
NSLU	noise-sensitive land use
O <sub>3</sub>	ozone
PM <sub>10</sub>	particulate matter less than 10 micrometers in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 micrometers in diameter

project	Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit
RP	San Diego Forward – The Regional Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SDAPCD	San Diego County Air Pollution Control District
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SO <sub>x</sub>	oxides of sulfur
TCR	Tribal Cultural Resource
TPA	Transit Priority Area
TSM	Transportation Study Manual
VMT	vehicle miles traveled

## Section 1 Initial Study Checklist

---

### 1.1 Project Summary

This Initial Study (IS) provides a program-level review of whether the Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit (project) is consistent with the 2018 Midway-Pacific Highway Community Plan (2018 Community Plan) (City of San Diego 2018a) and the 2018 Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report (2018 PEIR) (City of San Diego 2018b) prepared by the City of San Diego (City).

<b>Project name:</b>	Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit
<b>Project location:</b>	Midway-Pacific Highway Community Planning area (CP area)
<b>Lead agency's name and address:</b>	City of San Diego Planning Department 9485 Aero Drive, MS 413 San Diego, California 92123
<b>Contact person:</b>	Elena Pascual, Project Manager
<b>Previously Certified 2018 PEIR:</b>	The 2018 Community Plan is available for viewing online at <a href="https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf">https://www.sandiego.gov/sites/default/files/midway_-_pacific_highway_community_plan_sept_2018_0.pdf</a> .  The 2018 PEIR is available for viewing online at <a href="https://www.sandiego.gov/ceqa/final">https://www.sandiego.gov/ceqa/final</a> .

## 1.2 CEQA Determination

The City finds, on the basis of this evaluation and pursuant to the California Environmental Quality Act (CEQA) Guidelines, that:

- The project WOULD NOT have new significant effects on the environment that have not already been addressed by the 2018 PEIR; no substantial changes have occurred with respect to the circumstances under which the project will be undertaken; no new information of substantial importance to the project has been identified; and no minor technical changes or additions are necessary. In accordance with Sections 15162 and 15164 of the CEQA Guidelines, no subsequent CEQA documentation is required.
- The project WOULD NOT have new significant effects on the environment that have not already been addressed by the 2018 PEIR; no substantial changes have occurred with respect to the circumstances under which the project will be undertaken; and no new information of substantial importance to the project has been identified. However, minor technical changes or additions are necessary, and in accordance with Section 15164 of the CEQA Guidelines, an ADDENDUM is required.
- Although the project WOULD have one or more new significant effects on the environment, new or expanded mitigation measures have been identified that would reduce the effects to a less than significant level. In accordance with Section 15162 of the CEQA Guidelines, a MITIGATED NEGATIVE DECLARATION is required.
- The project MAY have a new significant effect on the environment that was not adequately addressed in the 2018 PEIR, or the project MAY result in a substantial increase in the severity of a previously identified significant effect, and there may not be feasible mitigation, which would reduce the new significant effect to a less than significant level. In accordance with Section 15162 of the CEQA Guidelines, a SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT is required.

## Section 2 Consistency with 2018 PEIR

---

The evaluation in this IS was conducted in accordance with Sections 15152 and 15183.5(a) of the CEQA Guidelines, which allow for tiered CEQA review provided that the project's effects have been addressed in a prior (or earlier) programmatic analysis. The 2018 PEIR comprehensively addressed the potential environmental effects of buildout of the 2018 Community Plan but did not include removal of the 30-foot height limit as a part of the plan. This IS addresses the removal of the 30-foot Coastal Height Limit Overlay Zone in the CP area. The project would not change the underlying base zone regulations, including the base zone's height limit. The analysis in this IS uses the same buildout assumptions for land use, density, and zoning identified in the 2018 PEIR.

### 2.1 Evaluation of Project Environmental Impacts

#### Checklist Explanation

On the basis of the tiering and subsequent review concepts identified in the CEQA Guidelines, the City has defined the following column headings in this IS. The headings rely on the relevant analyses in the 2018 PEIR:

- **Impact Examined in 2018 PEIR:** This column is checked where the potential impacts of the project were adequately examined in the certified 2018 PEIR. Where applicable, mitigation measures identified in the 2018 PEIR would mitigate the impacts of the project. The project is consistent with the analysis evaluated in the 2018 PEIR.
- **Impact Not Examined in 2018 PEIR:** If this column is checked, this indicates that potential effects of the project were not adequately evaluated in the certified 2018 PEIR. The potential effects of the project will result in one of the following:
  - (1) No impact in the category
  - (2) A less than significant impact in the category
  - (3) A new potentially significant impact

In the instances that (1) or (2) is checked, no additional CEQA documentation is necessary. In the instance that (3) is checked, additional CEQA documentation is necessary to further address the issue.

## Environmental Resources Addressed

The following environmental resources include those analyzed in the 2018 PEIR and those added to the CEQA Guidelines after certification of the 2018 PEIR. The environmental resources, if checked below, would be potentially affected by the project and would involve at least one significant impact that substantially exceeds or is otherwise outside the scope of activities evaluated for potential environmental effects in the 2018 PEIR, as discussed in Sections 2.1.1 through 2.1.20 of this IS.

If “None” is checked below, the project is deemed entirely consistent with and covered by the environmental analysis contained in the 2018 PEIR.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                                   | <input type="checkbox"/> Biological Resources                                 |
| <input type="checkbox"/> Energy                             | <input type="checkbox"/> Geologic Conditions                           | <input type="checkbox"/> Greenhouse Gas Emissions                             |
| <input type="checkbox"/> Health and Safety                  | <input type="checkbox"/> Historical and Tribal Cultural Resources      | <input type="checkbox"/> Hydrology and Water Quality                          |
| <input type="checkbox"/> Land Use                           | <input type="checkbox"/> Mineral Resources                             | <input type="checkbox"/> Noise  |
| <input type="checkbox"/> Paleontological Resources          | <input type="checkbox"/> Population and Housing                        | <input type="checkbox"/> Public Services and Facilities                       |
| <input type="checkbox"/> Public Utilities                   | <input type="checkbox"/> Transportation and Circulation                | <input checked="" type="checkbox"/> Visual Effects and Neighborhood Character |
| <input type="checkbox"/> Wildfire                           | <input checked="" type="checkbox"/> Mandatory Findings of Significance | <input type="checkbox"/> None   |

### 2.1.1 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less than Significant Impact	Potentially Significant Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The CP area is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The CP area is designated entirely as Urban and Built-Up Land. The 2018 PEIR concluded that no impact would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not impact important farmland because no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is in the CP area or within the immediate vicinity. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of

previously identified significant effects regarding Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

- b) The 2018 PEIR determined that the CP area is not zoned for agriculture, there are no lands under a Williamson Act contract, and no impact would occur.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in 2018 PEIR. The removal of the 30-foot height restriction would not impact agriculture-zoned lands or lands under a Williamson contract because no agriculture-zoned lands or Williamson contract lands occur in the CP area. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding existing zoning for an agricultural use or a Williamson Act contract.

- c) The CP area is within an urbanized area and does not include existing forest lands, timberlands, or timberland zoned Timberland Production that would conflict with existing zoning. The 2018 PEIR concluded that no impact would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in 2018 PEIR. The removal of the 30-foot height restriction would not impact forest lands, timberlands, or timberland zoned Timberland Production because none of these land uses exist in the CP area. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding existing zoning or rezoning of forest land, timberland, or timberland zoned Timberland Production.

- d) As discussed in Section 2.1.1(c), the CP area is an urbanized area and does not include existing forest land. The 2018 PEIR concluded that no impact would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in 2018 PEIR. The removal of the 30-foot height restriction would not contribute to the loss of forest land because no forest land exists in the CP area. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the loss of forest land or conversion of forest land to a non-forest use.

- e) As discussed in Section 2.1.1(a–d), the CP area is an urbanized area and does not include existing farmland or forest land. The 2018 PEIR concluded that no impacts would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in 2018 PEIR. The removal of the 30-foot height restriction would not impact existing farmland or forest land because no farmland or forest land exists in the CP area. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects involving other changes that could result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use.

## 2.1.2 Air Quality

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations, including toxins?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The 2018 PEIR evaluated the 2018 Community Plan’s consistency with the San Diego County Air Pollution Control District’s (SDAPCD’s) plans for the San Diego Air Basin, including the carbon monoxide (CO) Maintenance Plan, the federal 2012 maintenance plan for ozone (O<sub>3</sub>), National Ambient Air Quality Standards (NAAQS), California Ambient Air Quality Standards (CAAQS), and the 2016 Regional Air Quality Strategy. The SDAPCD submitted an updated O<sub>3</sub> Attainment Plan to the California Air Resources Board (CARB) in 2020; however, the plan has not been approved by the U.S. Environmental Protection Agency. An update to the 2016 Regional Air Quality Strategy is currently being prepared but has not yet been released for public review. As such, the Air Quality Plans evaluated in the 2018 PEIR remain the plans applicable to the CP area.

Projects that are consistent with the assumptions and emissions forecasts used in the development of applicable Air Quality Plans are considered to not conflict with or obstruct the attainment of the air quality standards identified in the plan. The 2018 PEIR determined that the 2018 Community Plan would be consistent with the 2008 City of San Diego General Plan (General Plan) and would not result in a substantial net increase in construction and operational emissions. The 2018 Community Plan’s potential to result in criteria pollutant emissions is further evaluated in Section 2.1.2(b). Impacts related to conflicts with applicable Air Quality Plans were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area and would not change the underlying base zone regulations, including the base zone’s height limit. Therefore, the project would not change the total construction and operational emissions from buildout in the CP area. The project would not change any of the goals and strategies in the 2018 Community Plan and,

thus, would remain consistent with the City's General Plan. Emissions and impacts would be the same as those analyzed in the 2018 PEIR. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding Air Quality Plan consistency.

- b) Potential emissions of the relevant criteria pollutants from construction and buildout of the 2018 Community Plan were modeled using the California Emissions Estimator Model (CalEEMod). Relevant criteria pollutants include oxides of nitrogen (NO<sub>x</sub>), oxides of sulfur (SO<sub>x</sub>), CO, particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>), particulate matter less than 2.5 micrometers in diameter (PM<sub>2.5</sub>), and volatile organic compounds. Intensity of construction activity associated with implementation of the 2018 Community Plan would likely vary from year to year due to changes in market conditions and preferences of project applicants. Consistent with Sacramento Metropolitan Air Quality Management District guidance, the 2018 PEIR conservatively assumed that 25 percent of allowable development would be constructed in a single year, including 73,400 square feet of commercial development and 2,404 dwelling units. The analysis also assumed that 25 percent of existing uses would be demolished in the same year. Emissions were compared to estimated annual construction emissions from implementation of the previous 1991 Community Plan to determine the net increase in potential emissions. The 2018 PEIR determined that the conservative estimated annual construction emissions under the 2018 Community Plan would not result in a net increase that would exceed any of the City's significance thresholds for criteria pollutant emissions. Construction emissions were determined to be less than significant, and no mitigation measures were required.

Operational emissions from 2018 Community Plan buildout were calculated and compared to the previous 1991 Community Plan to determine if implementation of the plan would potentially result in or contribute to a violation of any air quality standard by exceeding forecasted emissions in regional planning documents. The net change in calculated emissions for the 2018 Community Plan compared to the previous 1991 Community Plan were below the City's significance thresholds for all criteria pollutants. The 2018 PEIR determined that operation of the land uses proposed in the 2018 Community Plan would not significantly increase air pollutants in the region, would not further increase the frequency of existing violations of NAAQS or CAAQS, and would not result in new exceedances. Therefore, operational air quality impacts associated with implementation of the 2018 Community Plan were also determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area and would not change the underlying base zone regulations, including the base zone's height limit. Traffic associated with the project

would not be greater than the traffic volume previously analyzed and disclosed in the 2018 PEIR (Appendix A, Transportation Impact Analysis). Therefore, the total construction and operational emissions from buildout of the CP area, as well as associated emissions and impacts would be the same as those analyzed in the 2018 PEIR. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding air quality standard violations.

- c) CO hotspots that exceed CAAQS or NAAQS for CO have the potential to occur at heavily congested intersections. Two intersections were identified in the 2018 PEIR as having the potential to deteriorate to a level of service E or worse under the 2018 Community Plan implementation. However, the PEIR determined that these intersections would not exceed applicable vehicle trips per hour screening levels for congested intersections; therefore, CO hotspots would not occur. The 2018 PEIR determined that implementation of the 2018 Community Plan would not result in any CO hotspots.

Regarding toxic air contaminants during construction, the 2018 PEIR determined that construction of the land uses proposed under the 2018 Community Plan would not expose individual receptors to substantial toxic air contaminant concentrations due to the highly dispersive nature of diesel particulate matter and the fact that construction activities would occur intermittently and at various locations over the 2018 Community Plan implementation period. During operation, Commercial land uses accommodated under the 2018 Community Plan may potentially include stationary sources of toxic air contaminants, such as dry-cleaning establishments and diesel-fueled back-up generators. However, the 2018 Community Plan contains the following policies related to the siting of land uses and air quality, and implementation of the 2018 Community Plan would be consistent with the goals of CARB's Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005):

- **CE-4.1:** Consider air quality and air pollution sources in the siting, design, and construction of residential development and other development with sensitive receptors.
- **CE-4.2:** Incorporate building features into new buildings with residential units and other sensitive receptors located within 500 feet of the outside freeway travel lane to reduce the effects of air pollution.

Furthermore, in accordance with Assembly Bill (AB) 2588, if adverse health impacts exceeding public notification levels are identified, stationary sources of toxic air contaminants must provide public notice, and if the facilities pose a potentially significant public health risk, the facilities must submit a risk reduction audit and plan to demonstrate how the facilities would reduce health risks. Thus, the 2018 PEIR determined that air quality impacts to sensitive receptors would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area and would not change the underlying base zone regulations, including the base zone's height limit. Therefore, the project would not change the total construction and operational emissions from buildout in the CP area. Traffic associated with the project would not be greater than the traffic volume previously analyzed and disclosed in the 2018 PEIR (Appendix A). Therefore, vehicle trip generation and toxic air contaminant concentrations associated with construction and operation would remain the same as those analyzed in the 2018 PEIR. Future development would be subject to the existing regulatory framework and the siting guidelines outlined in the 2018 Community Plan. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding sensitive receptors.

- d) During construction, equipment exhaust is a potential source of odors. However, the 2018 PEIR determined that because construction of land uses proposed under the 2018 Community Plan would involve typical construction techniques, construction odors would disperse rapidly with distance from the source and would not result in frequent exposure of on-site receptors to objectionable odor emissions. The 2018 PEIR determined that operation of land uses proposed under the 2018 Community Plan would not include new land uses associated with the generation of adverse odors. Major sources of odors include wastewater treatment and pumping facilities, sanitary landfills, painting/coating operations, and compositing facilities that would not be accommodated under the 2018 Community Plan. Multi-Family Residential and Commercial land uses are not associated with significant odor generation. Uses would be similar to existing Commercial land uses that are not a source of significant odor complaints. Further, the SDAPCD rules prohibit emissions of any air contaminants that cause an injury, nuisance, or annoyance to any considerable number of people or endanger the comfort, health, or safety of the public. Therefore, the 2018 PEIR determined that impacts would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area and would not change the underlying base zone regulations, including the base zone's height limit. Therefore, the project would not change the total construction and operational emissions from buildout in the CP area. The project would generate the same types of odor emissions evaluated in the 2018 PEIR. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding odors.

### 2.1.3 Biological Resources

Would the project result in:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the City's Multiple Species Conservation Program (MSCP) or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service (USFWS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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 Subarea Plan, or impede the use of native wildlife nursery sites?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. 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 Subarea Plan area or in the surrounding region?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The majority of the CP area is mapped as Urban/Developed Land. The 2018 PEIR determined that there is no potential for sensitive terrestrial wildlife or sensitive plant species to occur in the proposed development areas. However, the 2018 PEIR concluded that bird species protected under the Migratory Bird Treaty Act may nest in the ornamental trees present in the CP area that could be impacted by future development. Future discretionary development would be required to conduct pre-construction surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and to ensure that no impact occurs to any nesting birds or their eggs, chicks, or nests. The 2018 PEIR also concluded that although the San Diego River is adjacent to the CP area, development and

growth would be south of Interstate (I-) 8, and sensitive species inhabiting the San Diego River north of I-8 would not be indirectly impacted by activities associated with the 2018 Community Plan. The 2018 PEIR determined that impacts would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The project would not change impacts to ornamental trees that could be removed during development of future land uses allowed under the 2018 Community Plan, which have the potential to support nesting bird species, including common species, protected under the Migratory Bird Treaty Act. Consistent with the 2018 PEIR, future discretionary development would be required to conduct pre-construction surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and to ensure that no impact occurs to any nesting birds or their eggs, chicks, or nests. The project would also not result in indirect impacts to sensitive species inhabiting the San Diego River because development and growth in the CP area would not extend north of I-8. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding sensitive species.

- b) The CP area is mapped as Urban/Developed Land and does not support sensitive vegetation communities. The 2018 PEIR concluded that although the San Diego River is adjacent to the CP area, development and growth would be located south of I-8. Sensitive vegetation communities along the San Diego River, north of I-8, would not be directly or indirectly impacted. Therefore, impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Project implementation would result in the same less than significant impacts to non-sensitive disturbed lands and urban/developed lands as those identified in the 2018 PEIR. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding sensitive habitats.

- c) No wetland habitats are in the CP area; therefore, the 2018 PEIR concluded that no impact would occur, and no mitigation measures were required. The nearest wetland areas are within the San Diego River, which is north of I-8 and the CP area.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Implementation of the project would not impact wetlands. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wetlands.

- d) The CP area is mapped as Urban/Developed Land and does not contain wildlife corridors. The San Diego River, located north of I-8 and the CP area, functions as a local and regional wildlife corridor. The 2018 PEIR concluded that since development and growth would be south of I-8, development of land uses proposed under the 2018 Community Plan would not impact the wildlife corridor along the San Diego River. Impacts to a local and regional wildlife corridor were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Implementation of the project would not impact the wildlife corridor along the San Diego River, and impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wildlife corridors.

- e) The CP area is within the City's Multiple Species Conservation Program (MSCP) but does not contain any Multi-Habitat Planning Area (MHPA) lands (City of San Diego 1998). The MHPA is north of I-8 in the San Diego River. The 2018 PEIR concluded that development adjacent to MHPA lands could have indirect effects on the MHPA due to increased runoff, trampling, and removal of plant cover due to hiking, biking, and other human activities; increased presence of toxins; increased nighttime light levels; redirection or blockage of wildlife movement; and increased levels of non-native and invasive plants. Future projects adjacent to the MHPA would be subject to the City's MHPA Land Use Adjacency Guidelines and would be required to incorporate features into project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines to minimize indirect effects. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Future development projects in the CP area that are adjacent to the MHPA would be subject to the City’s MHPA Land Use Adjacency Guidelines, which address indirect effects on the MHPA from adjacent development. Future projects would be required to incorporate features into project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to 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.

#### 2.1.4 Energy

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Energy impacts related to the 2018 Community Plan are addressed in Section 7.2.4, Energy, of the 2018 PEIR. Although the above CEQA Guidelines Appendix G IS checklist items are not specifically addressed in this section, the analysis focuses on two issues related to energy: (1) whether the project would result in excessive energy consumption, and (2) the project’s impact related to energy supply. The City’s Climate Action Plan (CAP) is noted as the applicable plan for determining future project’s impacts related to energy consumptions (City of San Diego 2015). These issues align with the current IS checklist items; therefore, this impact was adequately examined in the 2018 PEIR. The first issue related to energy consumption is addressed in Section 2.1.4(a), and the second issue related to the City’s CAP and energy supply is addressed in Section 2.1.4(b) of this IS.

- a) Pursuant to the 2018 PEIR, implementation of the 2018 Community Plan would result in energy consumption during construction and operation. During construction, future discretionary projects implemented under the 2018 Community Plan would be required to develop Waste Management Plans and comply with the AB 341 target of at least 75 percent

waste reduction, as applicable, including construction waste. Additionally, no conditions in the CP area would require non-standard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, buildout of the 2018 Community Plan would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects.

Long-term operational energy use associated with development under the 2018 Community Plan would include fuel consumption of vehicles, electricity and natural gas consumption by residents and commercial operations, and energy consumption related to obtaining water. However, the use of these resources would still occur in the CP area and as a result of regional growth regardless of implementation of the 2018 Community Plan. As such, although long-term operational energy use would result from future development, such changes would not be considered significant in comparison to the energy use of other cities in the region. Implementation of the 2018 Community Plan would not result in any unusual characteristics that would result in excessive long-term operational building energy demand. Additionally, at a minimum, future projects 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).

The 2018 Community Plan includes policies that would reduce energy consumption in the CP area. Specifically, the Mobility, Conservation, and Urban Design Elements include policies that would reduce local dependence on automobile transportation by creating a walkable block pattern, improving pedestrian and bicycle infrastructure, and encouraging pedestrian-oriented development; support transit use and transit infrastructure improvements; adhere to standardized measures outlined in the City's CAP; and encourage streetlight retrofits and outdoor lighting that is energy efficient. Representative example policies from the 2018 Community Plan are provided below but are not a comprehensive list of adopted energy-reducing policies (City of San Diego 2018b):

- **Mobility Element Policy ME-2.2:** Support and promote walkability and connectivity through the construction of sidewalk and intersection improvements throughout the community.
- **Mobility Element Policy ME-2.11:** Coordinate with Caltrans [California Department of Transportation] to improve the pedestrian and bicycle environment, improve access to nearby communities, and reduce conflicts with motor vehicles at all freeway undercrossings and overcrossings.
- **Mobility Element Policy ME-4.6:** Coordinate with MTS [San Diego Metropolitan Transit System] and SANDAG [San Diego Association of Governments] to provide Rapid Bus stations and mobility hubs at the Sports Arena Community Village and the Dutch Flats Urban Village.

- **Urban Design Element Policy UD-1.1:** Maintain and expand grid street patterns with walkable block sizes (perimeter of 1,500 feet or less) to support pedestrian-oriented development.
- **Urban Design Element Policy UD-8.1:** Encourage the adaptive reuse of existing buildings, in conjunction with improvements to increase energy efficiency and building longevity.
- **Urban Design Element Policy UD-8.2:** Design buildings and sites to incorporate passive solar design.
- **Urban Design Element Policy UD-8.5:** Maximize the use of solar energy through installation of photovoltaic panels, solar water heating systems, and other technologies.
- **Conservation Element Policy CE-1.1:** Continue to implement General Plan policies related to climate change and support implementation of the CAP through a wide range of actions including:
  - a. Implementing pedestrian and bicycle infrastructure improvements in Transit Priority Areas to increase commuter walking and bicycling opportunities.
  - b. Supporting higher density/intensity housing and employment development in Transit Priority Areas to increase transit ridership.
  - c. Providing bicycle and pedestrian improvements in coordination with street resurfacing as feasible.
  - d. Coordinating with SANDAG to identify transit right-of-way and priority measures to support existing and planned transit routes, prioritizing for implementation the highest priority bicycle and pedestrian improvements.
  - e. Supporting regional improvements that promote alternative modes of transportation, such as mobility hubs.
  - f. Providing bicycle- and car-sharing programs and their facilities such as bike-sharing stations and car-sharing vehicle access points.
  - g. Retiming traffic signals and installing roundabouts where needed to reduce vehicle fuel consumption.
  - h. Applying the CAP consistency checklist as a part of the development permit review process, as applicable.
  - i. Supporting and implementing improvements to enhance transit accessibility and operations, as feasible.
  - j. Monitoring the mode share within the community’s TPAs [Transit Priority Areas] to support the CAP Annual Monitoring Report Program.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Energy demand would be similar with implementation of the project as anticipated under the 2018 Community Plan because

total allowable density buildout would be the same. Implementation of the 2018 Community Plan policies would further reduce energy demand in the CP area. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding energy use.

- b) Development of land uses allowed under the 2018 Community Plan would result in increased energy use in the form of new buildings and transportation. As described previously, implementation of the policies in the 2018 Community Plan and CAP would decrease the overall per-capita energy use in the CP area. However, these policies do not ensure that energy supplies will be available when needed. Future projects would be required to implement measures to reduce energy consumption in conformance with existing regulations. Even with compliance with existing regulatory processes and plans, including the Green Building Standards and the City's CAP, it is assumed that the energy use associated with new development would result in the overall net increased use of nonrenewable energy resources compared to existing conditions. The degree of future individual projects' energy consumption and the availability of nonrenewable energy sources at a given time cannot be adequately known. The 2018 PEIR determined that this represents an irreversible or significant and unavoidable environmental change.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Energy demand, including vehicle fuel and building energy consumption, would be similar with implementation of the project as anticipated under the 2018 Community Plan because the total allowable density buildout would be the same. An additional net increase in energy consumption would not occur from project implementation. Furthermore, future development would be required to comply with the existing regulatory processes and plans regarding energy use. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding energy supply and planning.

## 2.1.5 Geologic Conditions

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a.i) The CP area is within the Rose Canyon Fault Zone. In addition, other nearby known active faults include the Coronado Bank and the Newport-Inglewood (offshore) faults, located approximately 11.9 and 30.9 miles from the CP area, respectively. The 2018 PEIR concluded that the CP area would be subject to seismic events, including the risk of loss, injury, or death involving rupture of a known earthquake fault. All new development and redevelopment would be required to comply with the San Diego Municipal Code (SDMC) (City of San Diego 2022) and the California Building Code (CBC), which includes design criteria for seismic loading and other geologic hazards and requires that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category. The 2018 PEIR determined that compliance with the SDMC and the CBC would reduce impacts to less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development

to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the project would require future development in the CP area to comply with the SDMC and the CBC, which would reduce the risk of loss, injury, or death involving rupture of a known earthquake fault. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding known earthquake faults.

- a.ii) The CP area is within the Rose Canyon Fault Zone. In addition, other nearby known active faults include the Coronado Bank and the Newport-Inglewood (offshore) faults, located approximately 11.9 and 30.9 miles from the CP area, respectively. The 2018 PEIR concluded that the CP area would be subject to seismic events, including potential hazards associated with ground shaking. All new development and redevelopment would be required to comply with the SDMC and the CBC, which includes design criteria for seismic loading and other geologic hazards and requires that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category. The 2018 PEIR determined that compliance with the SDMC and the CBC would reduce impacts to less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the project would require future development to comply with the SDMC and the CBC, which would reduce potential hazards associated with ground shaking. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding hazards associated with ground shaking.

- a.iii) Liquefaction-induced ground failure can involve a complex interaction among seismic, geologic, soil, topographic, and groundwater factors. The 2018 PEIR determined that high liquefaction hazard boundaries correspond to areas of artificial fill and alluvium throughout the majority of the Midway area and the northwestern portion of the Pacific Highway corridor of the CP area. The bedrock and older alluvium areas within the CP area are not considered susceptible to liquefaction. The 2018 PEIR concluded that the CP area would be subject to seismic events and liquefaction-induced ground failure. All new development and redevelopment would be required to comply with the SDMC and the CBC, which includes design criteria for seismic loading and other geologic hazards and requires that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever

the occupancy classification of a building changes to a higher relative hazard category. The 2018 PEIR determined that compliance with the SDMC and the CBC would reduce impacts to less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the project would require future development to comply with the SDMC and the CBC, which would reduce the potential for liquefaction-induced ground failure. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding liquefaction-induced ground failure.

- a.iv) No mapped landslide areas are in the CP area. The 2018 PEIR concluded that the CP area would not be subject to seismically induced hazards, such as landslides. No impact would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the CP area would not be subject to seismically included hazards, such as landslides. No impact would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding seismically induced hazards, including landslides.

- b) The 2018 PEIR determined that construction and grading activities could remove the existing pavement and cover, temporarily exposing topsoil to potential runoff and increasing soil erosion from water and wind. The 2018 PEIR concluded that future development would be required to comply with SDMC Section 142.0146, which requires grading work to incorporate erosion and siltation control measures and the standards established in the Land Development Manual. For projects that disturb less than 1 acre of land, a Water Pollution Control Plan is required to identify the pollution prevention measures, including best management practices (BMPs) to be implemented during construction to reduce/eliminate discharges of pollutants to the storm drain conveyance system. In addition, any future development involving clearing, grading, or excavation that causes soil disturbance of 1 or more acres, or any project involving less than 1 acre that is part of a larger development plan, is subject to National Pollutant

Discharge Elimination System (NPDES) General Construction Stormwater Permit provisions. Any development of significant size in the City would be required to prepare and comply with an approved Stormwater Pollution Prevention Plan that would consider the full range of erosion control BMPs, including any additional site-specific and seasonal conditions. Conformance would ensure that grading and construction operations for future projects in CP area would avoid significant soil erosion. Impacts would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the project would require future development in the CP area to comply with the SDMC, the Land Development Manual, and the NPDES General Construction Stormwater Permit during construction and operation to provide adequate protection against soil erosion during and after site construction. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding soil erosion and loss of topsoil.

- c) The CP area is mapped as having a high potential for liquefaction. The potential for liquefaction and lateral spread is considered high in areas of human-placed artificial fill and underlying young alluvium. In addition, the potential for slope instability under non-earthquake conditions was determined to be high in the artificial cut/fill slope areas of the CP area. In areas where artificial fill may have been placed without proper engineering controls and inspections, the material may be susceptible to dynamic consolidation and subsidence, especially in areas where thick artificial fills have been placed against denser, old alluvium or bedrock materials. The 2018 PEIR concluded that future development would be required to prepare a geotechnical investigation that specifically addresses soil and slope stability as required by the CBC and the SDMC. Potential hazards associated with slope instability would be reduced through site-specific recommendations contained within geotechnical investigations as required by the CBC and the SDMC. The 2018 PEIR determined impacts to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the project would require future development in the CP area to prepare geotechnical investigations

addressing soil and slope stability in compliance with the SDMC and the CBC. Implementation of the site-specific recommendations identified in the geotechnical investigation would reduce potential hazards associated with soil and slope instability. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding geologic unit and soil instability.

- d) The CP area is largely underlain with artificial fill and paralic deposits (af, Qop6) that are susceptible to consolidation and may be more likely to have expansive clays due to their fine-grained nature. The 2018 PEIR determined that in compliance with the SDMC, future development would be required to prepare a site-specific geotechnical investigation to identify the presence of expansive soils and to provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area would be required to conduct a site-specific geotechnical investigation as required by the SDMC to identify the presence of expansive soils and provide recommendations to be implemented during grading and construction to ensure that potential hazards associated with expansive soils are minimized. Implementation of the recommendations in the site-specific geotechnical investigation would reduce potential impacts associated with expansive soils to a less than significant level. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding expansive soils.

## 2.1.6 Greenhouse Gas Emissions

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The City adopted its CAP and certified the PEIR for the CAP in 2015 (CAP PEIR) (City of San Diego 2015). Implementing actions necessary for the CAP PEIR to serve as a Qualified GHG Reduction Plan under CEQA Guidelines, Section 15183.5, were adopted in July 2016. Because the City has a qualified CAP in place, the 2018 PEIR directly tiered from the CAP PEIR for cumulative GHG emissions under CEQA Guidelines, Section 15183.5. As such, consistency with the City's CAP is used to evaluate the significance of the 2018 Community Plan's GHG impact. The consistency analysis included two parts: (1) a comparison of the land use and transportation assumptions for which the CAP was developed (Section 2.1.6(a)), and (2) a qualitative analysis of policies associated with the 2018 Community Plan (Section 2.1.6(b)).

The CP area is currently a source of anthropogenic GHG, with emissions generated by vehicular traffic and the energy use, water use, and solid waste management practices of existing development in the CP area. GHG emissions are estimated in terms of metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>), which gives weight to the global warming potential of different gases. The global warming potential is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of carbon dioxide (CO<sub>2</sub>). CO<sub>2</sub> has a global warming potential of 1, and the other GHG emissions of concern for land development, methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O), have 25 and 298 times greater global warming effect than CO<sub>2</sub>, respectively.

GHG emissions were calculated in the 2018 PEIR for the 2018 Community Plan and the previous 1991 Community Plan, as well as estimated total construction emissions from 2018 Community Plan implementation. Total construction emissions for the 2018 Community Plan were calculated to be 4,248 MTCO<sub>2e</sub>. Total estimated annual emissions from buildout year (2035) of the previous 1991 Community Plan were calculated to be 184,811 MTCO<sub>2e</sub>. Year 2035 land use development under the 2018 Community Plan was calculated to result in annual emissions of 206,518 MTCO<sub>2e</sub>, which is net increase of 21,707 MTCO<sub>2e</sub> above the previous 1991 Community Plan.

The estimated increase in emissions would be primarily due to additional multi-family dwelling units accommodated under the 2018 Community Plan, the majority of which are planned within identified TPAs. The General Plan's City of Villages strategy is a concept of walkable and pedestrian-friendly neighborhoods with a mixture of uses that revitalize existing neighborhoods while retaining their individual character (City of San Diego 2008). The TPAs, community villages, and districts proposed in the 2018 Community Plan would implement the CAP and the General Plan's City of Villages strategy by focusing projected future growth into mixed-use and multiple-use activity centers that are pedestrian- and bicycle-friendly and linked to transit. Additionally, although the 2018 Community Plan was calculated to result in the CP area having an increase in aggregated GHG emissions from increased population, on a per-capita basis, a decrease in GHG emissions would occur, consistent with the City's CAP targets for Citywide GHG emissions reductions.

Therefore, the 2018 PEIR determined that potential impacts related to GHG emissions from implementation of the 2018 Community Plan would be less than significant because the increase in GHG emissions from the 2018 Community Plan would be attributable to more intensive land uses per implementation of the CAP and the City of Villages strategy. Thus, the project would be consistent with the CAP and was determined to result in a less than significant impact related to GHG emissions. No mitigation measures were required.

The City is currently preparing an update to its CAP. The updated CAP has not been adopted. Therefore, the 2015 CAP remains the applicable document for determining the significance of project emissions. The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Traffic associated with the project would not be greater than the traffic volume previously analyzed and disclosed in the 2018 PEIR (Appendix A). Total estimated utility, energy and water consumption, solid waste generation, and vehicle use would remain the same. As such, total construction and annual operational GHG emissions would be the same as those in the 2018 Community Plan. The CAP and the City of Villages strategy would continue to be implemented as outlined in the 2018 Community Plan. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding GHG emissions.

- b) As noted previously, the 2018 PEIR analyzed the 2018 Community Plan's consistency with the City's CAP. Other plans evaluated included the CARB 2017 Scoping Plan, SANDAG 2011 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City's General Plan. The CARB 2017 Scoping Plan focuses on establishing statewide regulations and

is not directly applicable to local planning efforts (CARB 2017). However, the 2018 PEIR determined that the 2018 Community Plan was consistent with the CARB 2017 Scoping Plan because it would be generally consistent with the Scoping Plan's framework to reduce electricity demand by increasing energy efficiency and adoption of more stringent building and appliance standards. The 2018 Community Plan is consistent with the goals of the SANDAG 2011 RTP/SCS to develop compact, walkable, and bicycle-friendly communities close to transit connections and consistent with smart growth principles (SANDAG 2011). The 2018 Community Plan reinforces transit corridors and bicycle lanes; establishes three pedestrian-oriented, urban, and mixed-use villages that reduce reliance on the automobile; and promotes walking and biking and the use of alternative transportation. The 2018 Community Plan would implement the City of Villages strategy, including policies for the promotion of walkability, bicycle use, and transit-supportive development. Therefore, the 2018 PEIR determined that the 2018 Community Plan is consistent with the CAP and the General Plan. Additionally, the 2018 Community Plan refined General Plan policies with site-specific recommendations applicable to the CP area. Impacts related to conflicts with applicable plans and policies addressing GHG emissions were determined to be less than significant, and no mitigation measures were required.

As noted previously, the City's adopted 2015 CAP remains the applicable plan for reducing GHG emissions. The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The project would implement the same measures related to sustainability in the CP area, including the promotion of alternative modes of transportation and energy efficiency. As such, the project would be consistent with the CARB 2017 Scoping Plan, SANDAG 2011 RTP/SCS, the General Plan, and the CAP. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding applicable plans and policies addressing GHG emissions.

## 2.1.7 Health and Safety

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) As described in the 2018 PEIR, the CP area is highly urbanized and does not contain undeveloped land. The CP area is not identified in a fire hazard zone of state or local responsibility according to the California Department of Forestry and Fire Protection’s (CAL FIRE’s) Fire Hazard Severity Zones Viewer (CAL FIRE 2022). In addition, adherence to existing regulations, including the California Fire Code (CFC), CBC, Land Development Code (LDC), and development policies included in the General Plan, would reduce the risk of wildland fires from surrounding areas. Thus, impacts related to wildfires were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The CP area is not identified in a fire hazard zone of state or local responsibility; therefore, implementation of the project would not increase the risk of wildfires in the area. Consistent with the 2018 PEIR, future land uses in the CP area would be required to comply with fire safety regulations in the CFC, CBC, LDC,

and development policies in the General Plan. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding exposure of people to wildland fires.

- b) Several existing schools and daycare or educational centers are in the CP area, and other existing schools may be within a quarter-mile of the CP area. According to the 2018 PEIR, 73 documented hazardous material release cases were identified in the CP area, 13 of which were open, and the remaining 60 were closed cleanup program sites. While it is possible that hazardous emissions may be released due to materials or wastes being disturbed during project construction activities, the 2018 PEIR concluded that implementation of the 2018 Community Plan would result in decreased exposure of sensitive receptors to hazardous materials. 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 is received from the County Department of Environmental Health and Quality or a similar determination is issued by the City’s Fire-Rescue Department, California Department of Toxic Substance Control, San Diego Regional Water Quality Control Board, or other regulatory agency. Due to compliance with existing regulations, the 2018 PEIR determined that impacts would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, the project would not pose a greater risk of exposure to hazardous substances within a quarter-mile of an existing or proposed school. Consistent with the 2018 PEIR, future development in the CP area would be required to comply with City, state, and federal requirements for the handling of hazardous materials. Compliance with existing regulations would reduce impacts to a less than significant level. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding hazardous emissions and materials within a quarter-mile of an existing or proposed school.

- c) The San Diego County Emergency Operations Plan (County of San Diego 2018) is the applicable emergency plan for the CP area. It identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways in the County that could be used as primary routes for evacuation, two of which, I-5 and I-8, are directly adjacent to the CP area. The 2018 PEIR concluded that the 2018 Community Plan included improvements to the existing transportation infrastructure that could improve

evacuation times. Therefore, it would not impair implementation of, or physically interfere with, an adopted Emergency Response Plan or Emergency Evacuation Plan. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Implementation of the project would not impact existing or planned evacuation routes and would not interfere with the San Diego County Emergency Operations Plan. In addition, traffic generation and distribution would be similar to what was analyzed for the 2018 Community Plan, as further discussed in Section 2.1.17, Transportation and Circulation, of this IS. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding an Emergency Response Plan or Emergency Evacuation Plan.

- d) Based on a search of federal, state, and local regulatory databases conducted for the 2018 PEIR, 73 documented hazardous material release cases were identified in the CP area, 13 of which were open, and the remaining 60 were closed cleanup program sites. However, the 2018 PEIR concluded that compliance with federal, state, and local regulations, as well as policies included in the General Plan, would reduce potential impacts related to hazardous materials sites and health hazards to a less than significant level, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area would be required comply with all federal, state, and local regulations, as well as policies included in the General Plan, regarding the use, transportation, disposal, and accidental release of hazardous materials. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding hazardous materials sites.

- e) The CP area falls within the Airport Influence Area for the San Diego International Airport (SDIA). No private airstrips or heliport facilities are in the CP area. The 2018 PEIR determined that the 2018 Community Plan is consistent with the Airport Land Use Compatibility Plan

(ALUCP) (2014) for the SDIA because the Airport Land Use Commission (ALUC) deemed it conditionally consistent because future projects would be required to submit project-level consistency determinations. Thus, impacts related to the exposure of people or structures to aircraft hazards would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would allow some properties to increase height above 30 feet as long as they are consistent with the adopted land use, density, and zoning requirements for the site. However, in areas that overlap with the Airport Influence Area, the ALUCP height restrictions override the local land use and zoning designations. Therefore, the project would be consistent with the ALUCP and would not expose people or structures to a significant risk of loss, injury, or death from off-airport aircraft operational accidents. Future development in the CP area would be required to comply with land use policies related to airport compatibility and coordinate planning efforts with the San Diego County Regional Airport Authority to ensure height and land use compatibility. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding aircraft hazards.

## 2.1.8 Historical and Tribal Cultural Resources

Would the project result in:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. An alteration, including the adverse physical or aesthetic effects and/or the destruction of a historic building (including an architecturally significant building), structure, object or site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. A substantial adverse change in the significance of a prehistoric archaeological resource, a religious or sacred use site, or the disturbance of any human remains, including those interred outside of formal cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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:				
i. 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The 2018 PEIR identified four designated historical resources listed in the City’s Historical Resources Register in the CP area: the Hebrew Cemetery Site, Dutch Flats/Ryan Field, Mission Brewery/American Agar Co., and Mission Brewery Bottling Plant. The CP area also contains two properties listed on the National Register of Historic Properties: the Marine Corps Recruit Depot National Register Historic District and the Mission Brewery Bottling Plant. In addition, the CP area contains 45 potential individual resources that appear eligible for local listing under the City’s designation criteria. The 2018 PEIR concluded that future development could result in an alteration of a historic building, structure, object, or site resulting in a significant impact. Mitigation Measure HIST 5.3-1 was identified to reduce impacts; however, impacts were determined to be significant and unavoidable after implementation of all feasible mitigation (City of San Diego 2018b):

**HIST 5.3-1: Historic Buildings, Structures, and Objects.** Prior to issuance of any permit for a development project implemented in accordance with the project that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. The evaluation of historic architectural resources shall be based on criteria such as age, location, context, association with an important person or event, uniqueness, or structural integrity, as indicated in the Historical Resources Guidelines.

Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures shall include, but are not limited to:

- Preparing a Historic Resource Management Plan;
- Adding new construction that is compatible in size, scale, materials, color, and workmanship to the historical resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- Repairing damage according to the Secretary of the Interior’s Standards for Rehabilitation;
- Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource; and
- Shielding historic properties from noise generators through the use of sound walls, double glazing, and air conditioning.

Specific types of historical resource reports, outlined in Section III of the Historical Resources Guidelines, are required to document the methods to be used to determine the presence or absence of historical resources, identify potential impacts from a project, and evaluate the significance of any historical resources identified. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area consistent with the project could result in an alteration of a historic building, structure, object, or site resulting in a significant impact. Mitigation Measure HIST 5.3-1 would be implemented to reduce impacts. However, consistent with the conclusion in the 2018 PEIR, the degree of future impacts and the applicability, feasibility, and success of

future mitigation measures cannot be adequately known for each specific future project; thus, impacts would remain significant and unavoidable. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding historical resources.

- b) Seven archaeological and cultural resources have been recorded in the CP area. The 2018 PEIR concluded that although there is very little undeveloped land in the CP area, future development and related construction activities could result in the alteration or destruction of prehistoric or historical archaeological resources, objects, or sites and could impact religious or sacred uses or disturb human remains, particularly considering the CP area's proximity to the community of Old Town, resulting in a significant impact. Mitigation Measure HIST 5.3-2 was identified to reduce impacts; however, impacts were determined to be significant and unavoidable after implementation of all feasible mitigation (City of San Diego 2018b):

**HIST 5.3-2: Archaeological and Tribal Cultural Resources.** Prior to issuance of any permit for a future development project implemented in accordance with the project that could directly affect an archaeological or tribal cultural resource, the City shall require that the following steps be taken to determine (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources that may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.

#### Initial Determination

The environmental analyst will determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit, as needed. If there is any evidence that the site contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with the City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.

#### Step 1

Based on the results of the Initial Determination, if there is evidence that the site contains a historical resource, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archaeological testing, and

analysis. Before actual field reconnaissance would occur, background research is required, which includes a records search at the SCIC [South Coastal Information Center] at San Diego State University. Site records from the San Diego Museum of Man are now included in the data provided by the SCIC; however, in some instances, supplemental research at the Museum of Man may be required. A review of the Sacred Lands File maintained by the NAHC [Native American Heritage Commission] must 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.

In addition to the records searches mentioned above, background information may include, but is not limited to, examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archaeological research in similar areas, models that predict site distribution, and archaeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information would be included in the evaluation report.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance, based on the City Guidelines, must be performed by a qualified archaeologist.

## Step 2

Where a recorded site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City would be required to initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2., in accordance with AB 52. It should be noted that during the consultation process, tribal representative(s) will be directly involved in making recommendations regarding the significance of a tribal cultural resource that also could be a prehistoric archaeological site. A testing program may be recommended, which requires reevaluation 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, the 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 Guidelines. Results of the consultation process will 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 Guidelines. If significant historical resources are identified within the Area of Potential Effects, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. When appropriate, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate 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 there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

### Step 3

Preferred mitigation for historical resources is to avoid 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 an option, a Research Design and 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 will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures will be incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2.

The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document 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, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American tribal cultural resource or any archaeological site located on City property or within the Area of Potential Effects of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must 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 the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions will be outlined in the MMRP [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 of the 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 will be necessary for a complete evaluation.

Specific types of historical resource reports are required to document the methods (see Section III of the 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 “Archaeological Resource Management

Reports: Recommended Contents and Format” (see Appendix C of the Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources 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 and 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. Appendix D (Historical Resources Report Form) 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 would be required in accordance with the project MMRP. The disposition of human remains and burial-related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 [Coto] and California Native American Graves Protection and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., Native American Graves Protection and Repatriation Act [U.S.C. 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) 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 will 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 Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the CFR [Code of Federal Regulations], Part 79. Additional information regarding curation is provided in Section II of the Guidelines.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area consistent with the project could result in the alteration or destruction of prehistoric or historical archaeological resources, objects, or sites and could impact religious or sacred uses or disturb human remains, particularly considering the proximity to the community of Old Town, resulting in a significant impact. The project would require the implementation of Mitigation Measure HIST 5.3-2 to reduce impacts. However, consistent with the conclusion in the 2018 PEIR, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project so impacts would remain significant and unavoidable. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding archaeological resources.

- c) A Sacred Lands File check from the NAHC indicated that no sacred lands have been identified in the CP area, and the 2018 PEIR found that many key areas identified as having a high level of interest to local Native American communities are already listed on the City's Historical Resources Register, the California Register of Historical Resources, and the National Register of Historic Places or have not been formally recognized. For any future projects in the CP area where a recorded archaeological site or Tribal Cultural Resource (TCR) is identified, the City would be required to initiate consultation with identified California Indian Tribes pursuant to the provisions in California Public Resources Code, Sections 21080.3.1 and 21080.3.2, in accordance with AB 52. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the project and appropriate mitigation measures for direct impacts that cannot be avoided. The 2018 PEIR concluded that while existing regulations, the SDMC, and 2018 Community Plan policies would provide for the regulation and protection of TCRs and would avoid potential impacts, it is impossible to ensure the successful preservation of all TCRs. Therefore, potential impacts to TCRs were considered significant. Future development would be required to implement Mitigation Measure HIST 5.3-2 to minimize impacts. However, even with implementation of the applicable regulations, development policies and Mitigation Measure HIST 5.3-2, the 2018 PEIR determined that the feasibility and efficacy of mitigation measures cannot be determined, and impacts to TCRs would be significant and unavoidable.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area consistent with the project could result in significant impacts to TCRs. The project would require implementation of Mitigation Measure HIST 5.3-2 to reduce impacts. However, consistent with the conclusion of the 2018 PEIR, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project; thus, impacts would remain significant and unavoidable. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding TCRs.

### 2.1.9 Hydrology and Water Quality

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in a substantial increase in pollutant discharge to receiving waters and increase discharge of identified pollutants to an already impaired water body?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Deplete groundwater supplies, degrade groundwater quality, or interfere with groundwater recharge?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The CP area is an urban community, and the majority of the CP area is developed. Large areas of impervious surfaces (buildings, roadways, and surface parking) are mixed with a smaller amount of pervious (landscaped or ruderal) areas. The 2018 PEIR concluded that implementation of the project would have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in flooding and/or erosion. The 2018 PEIR concluded that adherence to the requirements of the City’s Drainage Design Manual (City of San Diego 2017) and Stormwater Standards Manual (City of San Diego 2021), which require installation of low-impact development practices, such as bioretention areas, pervious pavements, cisterns, and/or rain barrels, would improve surface drainage conditions or, at a minimum, not exacerbate flooding or cause erosion. In addition, future development

would be required to comply with NPDES permit requirements, which would result in a reduction in the volume and rate of surface runoff compared to existing conditions. The quantity of runoff reduction would depend on the design of open space, pervious areas runoff retention, and implementation of low-impact development practices. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area consistent with the project would be required to adhere to the City's Drainage Design Manual, Stormwater Standards Manual, and NPDES permit requirements to reduce the overall volume and rate of surface runoff and avoid flooding or changes in drainage patterns. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding flooding and changes in drainage patterns.

- b) The 2018 PEIR concluded that future development projects in the CP area would have the potential to increase pollutant discharges. However, future development projects would be required to incorporate low-impact development practices and stormwater BMPs into the project design and would adhere to the requirements of the San Diego Region's Municipal Separate Storm Sewer System (MS4) permit and the City's Stormwater Standards Manual. The 2018 PEIR also noted that the City adopted a Master Stormwater System Maintenance Program to address flood control issues through cleaning and maintenance of the City's stormwater channels. Therefore, the 2018 PEIR concluded that impacts to water quality would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future development in the CP area consistent with the project would be required to implement low-impact development practices and stormwater BMPs and would adhere to the requirements of the MS4 permit for the San Diego Region and the City's Stormwater Standards Manual. The City's Municipal Waterways Maintenance Plan, which replaced the previously adopted Master Stormwater System Maintenance Program, would continue to address flood control issues through the cleaning and maintenance of the City's stormwater facilities. Impacts would be less than significant. Therefore, the project would not result in any new

significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding water quality.

- c) The 2018 PEIR concluded that stormwater regulations that encourage infiltration of stormwater runoff and protection of water quality, including the City's Drainage Design Manual, City's Stormwater Standards Manual, MS4 permit for the San Diego Region, and NPDES permit requirements, would protect the quality of groundwater resources and support infiltration where appropriate. Impacts to groundwater supply and quality were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Future development in the CP area consistent with the project would be required to comply with stormwater regulations, including the MS4 permit for the San Diego Region, City's Stormwater Standards Manual, City's Drainage Design Manual, and NPDES permit requirements, which would protect the quality of groundwater resources and infiltration where appropriate. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding groundwater.

### 2.1.10 Land Use

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Lead to 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The 2018 PEIR analyzed the 2018 Community Plan in accordance with the applicable plans and regulations for the CP area: General Plan, LDC, Environmentally Sensitive Lands Regulations, MSCP/MHPA Land Use Adjacency Guidelines, Historical Resources Regulations, SANDAG's 2015 San Diego Forward – The Regional Plan (2015 RP), California Coastal Act of 1976, and the San Diego Unified Port District's Port Master Plan (2021). The 2018 PEIR determined that the 2018 Community Plan is consistent with the General Plan because the 2018 Community Plan provides site-specific recommendations that further express General Plan policies and establishes a framework for growth and development consistent with the General Plan. The 2018 Community Plan project included amendments to the LDC, which implement the 2018 Community Plan. Future development in accordance with the 2018 Community Plan adjacent to the San Diego River Flood Control Channel is required to comply with Environmentally Sensitive Lands Regulations and MSCP/MHPA Land Use Adjacency Guidelines. The 2018 Community Plan also includes policies aimed to reduce impacts to historical resources and would be required to comply with the City's Historical Resources Regulations. The 2018 Community Plan includes policies related to land use, mobility, and circulation/transportation that promote the 2015 RP's smart growth strategies. These policies include supporting implementation of the transit improvements identified in the 2015 RP, prioritizing the transit system and improving efficiency of transit services, providing planned alternative transportation facilities, and supporting improvements to pedestrian, bicycle, and transit facilities. Therefore, the 2018 Community Plan is consistent with the 2015 RP. The

2018 Community Plan also includes strategies to preserve, protect, and enhance public access to the Coastal Zone within the community and preserve coastal resources, which are consistent with the goals of the California Coastal Act of 1976. Finally, the 2018 Community Plan land use scenario was found to be consistent with the goals and policies of the Port Master Plan, and the 2018 Community Plan land uses adjacent to the Port-owned properties were determined not to conflict with the land uses in the Port Master Plan. Since the 2018 Community Plan was determined to be consistent with applicable environmental goals, objectives, or guidelines of the General Plan and other applicable plans and regulations, no indirect or secondary environmental impacts were identified. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The project would also not change land use types in the CP area. Future projects that propose development greater than 30 feet in height would be required to demonstrate consistency with the above-mentioned applicable plans. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding conflicts with the environmental goals, objectives, or guidelines of a General Plan or Community Plan or other applicable land use plan or regulation.

- b) The CP area includes existing Commercial, Industrial, Residential, Institutional, and Military land uses. No open space or Prime Farmland is in the CP area; therefore, the 2018 PEIR determined that the 2018 Community Plan would not convert open space or Prime Farmland and would not result in the physical division of an established community. No significant impacts were identified, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, similar to the 2018 PEIR, the project would not result in the conversion of open space and Prime Farmland because neither of these land uses exists in the CP area. Consistent with the 2018 PEIR, the project would not physically divide an established community. No impact would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the conversion of designated open space or

Prime Farmland to a more intensive land use, and would not result in the physical division of the community.

- c) The CP area does not include land identified as MHPA. The San Diego River Flood Control Channel, outside of the CP area, directly north, is an important open space resource and is within the MHPA. The City's MHPA Land Use Adjacency Guidelines manage land uses adjacent to the flood control channel to ensure minimal impacts to the MHPA (City of San Diego 1998). The 2018 PEIR concluded that development adjacent to MHPA lands could have indirect effects on the MHPA. Future projects would be subject to the City's MHPA Land Use Adjacency Guidelines and would be required to incorporate features into the project and/or permit conditions that demonstrate compliance with the MHPA Land Use Adjacency Guidelines to minimize indirect effects as described in Section 2.1.3, Biological Resources. Therefore, impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future projects in the CP area adjacent to the MHPA would be subject to the City's MHPA Land Use Adjacency Guidelines and would be required to incorporate features into the project and/or permit conditions to reduce indirect effects. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding conflicts with the provisions of the City's MSCP Subarea Plan.

- d) The CP area is within the adopted ALUCP for the SDIA. Part of the CP area is within the SDIA Airport Influence Area part of Review Area 1, and the entire CP area is within Review Area 2. A portion of the CP area is within the SDIA ALUCP noise contours; within the Safety Compatibility Zones, which set density and intensity requirements; partially within the Federal Aviation Regulations, Part 77, Notification Surfaces and the Threshold Siting Surface, which sets notification requirements for objects over 200 feet; and entirely within the Overflight Notification Area. Although the CP area is within the SDIA Airport Influence Area, the 2018 PEIR determined that the 2018 Community Plan would not result in significant impacts associated with the four compatibility concern areas. The 2018 Community Plan was submitted to the ALUC for a consistency determination with the SDIA ALUCP and was deemed conditionally consistent because future projects would be required to submit project-level consistency determinations prior to their approval. Future projects that involve a land use plan amendment or rezone would be required to receive an ALUC consistency determination stating that the project is consistent with the SDIA ALUCP. As a result, the 2018 PEIR determined

that the 2018 Community Plan would not result in land uses that are incompatible with an adopted ALUCP. Impacts were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would allow some properties to increase height above 30-feet as long as they are consistent with the adopted land use, density, and zoning requirements for the site. However, in areas that overlap with the SDIA Airport Influence Area, the ALUCP height restrictions would override the local land use and zoning designations. Future development projects within the CP area would be required to receive an ALUC consistency determination stating that the project is consistent with the SDIA ALUCP. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding compatibility with the SDIA ALUCP.

### 2.1.11 Mineral Resources

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) According to the California Department of Conservation, Division of Mines and Geology, the CP area is designated MRZ-1, which is an area where adequate geological information indicated that no significant mineral deposits are present or where it is judged that little likelihood for their presence exists. Therefore, the 2018 PEIR concluded that no impacts would occur from the loss of availability of known mineral resources, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The CP area is within MRZ-1 where there is little or no probability of mineral resources present. Consistent with the 2018 PEIR, no impacts would occur from implementation of the project. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding loss of availability of known mineral resources.

- b) The 2018 PEIR concluded that no identified locally important mineral resource recovery sites are in the CP area. No impacts would occur related to the loss of availability of a locally important mineral resource recovery site, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. As described in the 2018 PEIR, the CP area does not include any locally important mineral resource recovery sites as identified in the General Plan. No impact would occur from implementation of the project. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding loss of availability of a locally important mineral resource recovery site delineated on a local General Plan, specific plan, or other land use plan.

## 2.1.12 Noise

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in or create a significant increase in the existing ambient noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in land uses which are not compatible with aircraft noise levels as defined by an adopted Airport Land Use Compatibility Plan (ALUCP)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Result in the exposure of people to noise levels which exceed property line limits established in the Noise Abatement and Control Ordinance of the Municipal Code?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Result in the exposure of people to significant temporary construction noise?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Consistent with the existing conditions during preparation of the 2018 PEIR, existing noise sources in the CP area are primarily dominated by transportation-based noise sources. Transportation noise sources include vehicular road traffic; approach and departure of aircraft attributed to SDIA operations; and light rail (Trolley), passenger rail, and freight rail operations. Stationary noise sources include noise from typical industrial, commercial, and infrastructural facility operations. Measured noise levels in the CP area ranged from 58.4 A-weighted decibels (dBA) to 73.1 dBA during the 2017 noise survey conducted for the 2018 PEIR.

Two sources of permanent noise from 2018 Community Plan implementation were evaluated in the 2018 PEIR: operational stationary sources and vehicle noise. The 2018 PEIR determined that future stationary sources of operational noise would be similar to existing sources and would be required to comply with the SDMC regulations and General Plan policies related to noise generation. Vehicle noise was determined to be the primary source of concern for potential permanent increases in noise level.

The noise analysis prepared for the 2018 PEIR modeled existing vehicle noise levels and future (2035) vehicle noise levels with 2018 Community Plan implementation. Modeled noise levels were compared to the City's CEQA Significance Determination Thresholds. The 2018 PEIR determined that the 2018 Community Plan would result in an increase in ambient vehicular traffic noise in the CP area as a result of future development under the 2018 Community Plan

and increases in traffic due to regional growth. Specifically, three roadway segments would exceed the City's CEQA Significance Determination Thresholds (City of San Diego 2018b):

- Channel Way from Sports Arena Boulevard to Hancock Street
- Sports Arena Boulevard from Rosecrans Street to Pacific Highway
- Vine Street from California Street to Kettner Boulevard

However, the 2018 PEIR determined that the increase in noise levels on Channel Way and Vine Street would be generally imperceptible compared to existing conditions, primarily freeway noise, and a significant impact would not occur to these segments. However, a significant increase of more than 5 dBA would occur related to the impacted segment of Sports Arena Boulevard because it is located in an area that contains existing noise-sensitive land uses (NSLUs) (2018 PEIR Impact 5.5-1). No feasible mitigation was identified at the program level to reduce this impact to less than significant. As described below, existing City processes would require noise attenuation to lessen impacts to individual receptors in the future; however, the increase in ambient noise that exceeds the City's significance threshold would continue to occur. This impact was determined to be significant and unavoidable.

The 2018 PEIR also evaluated the potential for future NSLUs to be exposed to high levels of ambient noise. For new discretionary development, the 2018 PEIR concluded that the existing regulatory framework would ensure future projects implemented in accordance with the 2018 Community Plan would not be exposed to ambient noise levels in excess of the compatibility levels in the General Plan. This regulatory framework and review process includes policies in the 2018 Community Plan and the General Plan related to decibel levels, procedures in the SDMC, and regulations (Title 24 of the California Code of Regulations), as discussed in greater detail in Section 2.1.12(b). This framework would reduce traffic noise exposure because it sets standards for the siting of NSLUs and noise attenuation. With the implementation of these regulations and procedures, noise impacts applicable to new discretionary projects would be less than significant because exterior noise would be attenuated.

However, in the case of ministerial projects, the 2018 PEIR concluded that there is no procedure to ensure that exterior noise would be adequately attenuated. Therefore, exterior noise impacts for ministerial projects in areas that exceed the applicable land use and noise compatibility level would be significant (2018 PEIR Impact 5.5-2). Mitigation Measure NOISE 5.5-1 was identified to reduce significant exterior noise impacts associated with ministerial projects. The measure would have established new requirements for ministerial projects. However, this measure was determined to be infeasible because no procedure exists to ensure that an acoustical analysis would be required for ministerial projects. Therefore, the 2018 PEIR determined this impact to be significant and unavoidable.

The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Traffic associated with the project would not be greater than the traffic volume previously analyzed and disclosed in the 2018 PEIR (Appendix A). Future increases in vehicle noise levels and allowable types of NSLU would remain the same with implementation of the project. Consistent with the 2018 PEIR, impacts would be significant and unavoidable. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding increases in ambient noise levels.

- b) The 2018 PEIR evaluated the potential for NSLUs in the CP area to be exposed to roadway noise and rail noise as a result of 2018 Community Plan implementation. These issues are summarized separately below.

In the CP area, noise levels for all land uses would be incompatible (i.e., greater than 75 dBA Community Noise Equivalent Level [CNEL]) closest to the freeways and specific segments of Pacific Highway. Additional areas along freeway and major roadways would be conditionally compatible with NSLUs. CNEL is the average equivalent sound level over a 24-hour period, with a penalty added for noise during evening and nighttime hours (7:00 p.m. to 7:00 a.m.). The CP area is currently developed, although the 2018 Community Plan implemented changed land use designations in some of the CP area. However, similar to Section 2.1.12(a), an existing regulatory framework and review process exists for new discretionary development, requiring projects to demonstrate that exterior and interior noise levels would be compatible with City standards. Specifically, General Plan Policy NE-A.4 requires an acoustic study for proposed developments in areas where the existing or future noise level exceeds or would exceed the "compatible" noise level thresholds as identified in the General Plan Noise Compatibility Guidelines. Site-specific exterior noise analyses that demonstrate that the project would not place sensitive receptors in locations where the exterior existing or future noise levels would exceed the noise compatibility guidelines of the General Plan would be required as part of future discretionary proposals. Additionally, site-specific interior noise analyses demonstrating compliance with the interior noise compatibility guidelines of the General Plan would be required for land uses in areas where exterior noise levels exceed the noise and land use compatibility thresholds as defined in the General Plan Noise Element. This requirement is implemented through submission of a Title 24 Compliance Report to demonstrate interior noise levels of 45 dBA CNEL. With this framework, exterior traffic noise impacts associated with new development requiring discretionary actions and interior traffic noise impacts for both ministerial and discretionary projects would be less than significant.

Noise compatibility impacts associated with future discretionary projects implemented in accordance with the 2018 Community Plan would be less than significant with implementation of existing regulations and noise standards. However, in the case of ministerial projects, there is no procedure to ensure that exterior noise is adequately attenuated. Therefore, exterior noise impacts for ministerial projects in areas that exceed the applicable land use and noise compatibility level would be significant (2018 PEIR Impact 5.5-3). Similar to Section 2.12.1(a), Mitigation Measure NOISE 5.5-1 was identified to reduce significant exterior noise impacts associated with ministerial projects; however, this measure was determined to be infeasible because no procedure exists to ensure that an acoustical analysis would be required for ministerial projects. Therefore, the 2018 PEIR determined that vehicle noise exposure would result in a significant and unavoidable impact.

Regarding rail noise, potential noise levels from Amtrak, COASTER, and freight train operation at the nearest planning area boundary and the nearest sensitive receptors would exceed the 60 dBA day-night average sound level (Ldn) screening level. The Ldn is the average equivalent sound level over a 24-hour period, with a penalty added for noise during the nighttime hours (10:00 p.m. to 7:00 a.m.). However, the 2018 PEIR determined that all sensitive receptors within the 60 dBA Ldn contour for rail noise would experience existing and future traffic noise levels in excess of 70 dBA CNEL. In addition, as discussed previously, interior noise impacts for all projects, including ministerial projects, would be less than significant because applicants must demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report. Thus, impacts specifically from rail noise were determined to be less than significant, and no mitigation measures were required.

The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Traffic associated with the project would not be greater than the traffic volume previously analyzed and disclosed in the 2018 PEIR (Appendix A). Future allowable NSLU types and exposure to vehicle and rail noise would remain the same under the project as the types and exposure identified in the 2018 PEIR. Vehicle noise would be significant and unavoidable, and rail noise would be less than significant with implementation of the project. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding exposure to transportation noise.

- c) The SDIA is south and west of the CP area. Most aircraft flying over the CP area are approaching the SDIA; departures over the CP area occur irregularly and are typically dependent on adverse meteorological conditions precluding westbound departures. The 2018

PEIR determined that based on the projected airport noise contours for the SDIA, sensitive receptors in the CP area are where noise levels due to aircraft operations exceed the applicable aircraft noise compatibility standard of 60 dBA CNEL. However, at the project level, future development must include interior noise attenuation consistent with the General Plan Noise Element and the ALUCP for the SDIA. The City currently submits discretionary and ministerial projects that increase residential units, increase non-residential floor area, and/or result in a change in use to the ALUC for a consistency determination with the ALUCP. All future projects under the 2018 Community Plan would be required to submit project-level consistency determination applications until such time as the ALUC determines that the City has incorporated the noise policies and standards of the ALUCP into the SDMC. Therefore, impacts related to airport noise were determined to be less than significant, and no mitigation measures were required.

The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Future allowable NSLU types and exposure to aircraft noise would remain the same under the project as identified for the 2018 Community Plan. Impacts would be less than significant with demonstrated compliance with the General Plan Noise Element and the ALUCP for the SDIA. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding exposure to aircraft noise.

- d) The 2018 PEIR determined that mixed-use sites and areas where Residential land uses are in proximity to commercial sites would expose sensitive receptors to noise. Although NSLUs such as residences would be exposed to noise associated with the operation of these Commercial land uses, City policies and regulations, including policies in the 2018 Community Plan, the General Plan, and the SDMC, would control noise and reduce noise impacts between land uses. In addition, enforcement of state noise regulations in Title 24 of the California Code of Regulations would control impacts. With implementation of these policies and enforcement of the Noise Abatement and Control Ordinance of the SDMC, impacts were determined to be less than significant, and no mitigation measures were required.

The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Future development consistent with the project would be required to comply with all applicable City and state regulations to control noise and reduce noise impacts between land uses. Therefore, the project would not result in any new significant

environmental effects or a substantial increase in the severity of previously identified significant effects regarding noise ordinance compliance.

- e) The 2018 PEIR addressed noise and vibration related to construction under the 2018 Community Plan. Operational vibration was also addressed under this issue.

The 2018 PEIR determined that construction activities related to implementation of the 2018 Community Plan would potentially generate short-term noise levels in excess of the City's CEQA Significance Determination Threshold of 75 dBA equivalent continuous sound level (Leq) at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards (e.g., days of the week and hours of operation) and imposition of conditions of approval for building or grading permits, a procedure is in place that allows for variance to the noise ordinance. Due to the highly developed nature of the CP area, with sensitive receivers potentially located in proximity to any given construction site, there is potential for construction of future projects to expose existing NSLUs to significant noise levels. While future development projects would be required to incorporate feasible mitigation measures, due to the proximity of sensitive receivers to potential construction sites, the program-level impact related to construction noise was determined to be significant (2018 PEIR Impact 5.5-4). Mitigation Measure NOISE 5.5-2 was identified to reduce construction noise impacts to a less than significant level (City of San Diego 2018b):

**NOISE 5.5-2:** At the project level, future discretionary projects will be required to incorporate feasible mitigation measures. Typically, noise can be controlled to comply with City standards when standard construction noise control measures are enforced at the project site and when the duration of the noise-generating construction period is limited to one construction season (typically 1 year) or less.

- 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 as specified in Section 21.04 of the SDMC, with exception of Columbus Day and Washington's Birthday, or on Sundays (consistent with Section 59.5.0404 of the SDMC).
- Equip all internal combustion engine-driven equipment with appropriately-sized intake and/or exhaust mufflers that are properly operating and maintained consistent with manufacturer's standards.
- Stationary noise-generating equipment (e.g., compressors or generators) shall be located as far as possible from adjacent residential receivers and oriented so that emitted noise is directed away from sensitive receptors, whenever feasible.
- If levels are expected to potentially exceed SDMC thresholds, temporary noise barriers with a minimum height of 8 feet shall be located around pertinent active construction equipment or entire work areas to shield nearby sensitive receivers.

- Utilize “quiet” air compressors, generators, and other stationary noise sources where technology exists.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a “disturbance coordinator” who would be responsible for receiving and responding to any complaints about construction noise or vibration. The disturbance coordinator will determine the cause of the noise complaint and, if identified as a sound generated by construction area activities, will require that reasonable measures be implemented to correct the problem.

Regarding vibration during construction, the 2018 PEIR determined that use of administrative controls, such as scheduling construction activities with the highest potential to produce vibration during hours with the least potential to affect nearby properties, could keep perceptible vibration to a minimum and would result in a less than significant impact. However, due to the highly developed nature of the CP area with existing structures occupying the majority of parcels, pile-driving would have the potential to exceed damage thresholds and was determined to be significant (2018 PEIR Impact 5.5-5). Mitigation Measure NOISE 5.5-3, as follows, was identified to reduce impacts but not to below a level of significance; therefore, impacts would be significant and unavoidable after implementation of all feasible mitigation measures (City of San Diego 2018b):

**NOISE 5.5-3:** For discretionary projects where construction would include vibration-generating activities, such as pile-driving, within the distances of specific structures listed in Table 5.5-7, site-specific vibration studies shall be conducted to ensure the development project would not adversely affect adjacent properties to the satisfaction of the Chief Building Official. Such efforts shall be conducted by a qualified structural engineer and could include:

- Identify sites that would include vibration compaction activities such as pile-driving and have the potential to generate groundborne vibration and the sensitivity of nearby structures to groundborne vibration.
- Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted; set up a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions. Construction contingencies would be identified for when vibration levels approach the limits.
- Monitor vibration during initial demolition activities and during pile-driving activities. Monitoring results may indicate the need for more or less intensive measurements.

- Designate a “disturbance coordinator” who would be responsible for receiving and responding to any complaints about construction vibration. The disturbance coordinator will determine the cause of the noise complaint and will require that reasonable measures be implemented to correct the problem.
- When vibration levels approach limits, suspend construction and implement contingencies to either lower vibration levels or secure the affected structures.
- Conduct post-activity survey on structures where either monitoring has indicated high levels or complaints of damage have been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.

Post-construction operational vibration impacts were evaluated in the 2018 PEIR related to commercial operations that may be implemented in accordance with the project. The Commercial land uses that would be constructed under the project would include typical uses such as retail, restaurants, and small offices that would not require heavy mechanical equipment that would generate groundborne vibration or heavy truck deliveries. Residential and civic uses do not typically generate vibration. Thus, operational vibration impacts associated with the project were determined to be less than significant, and no mitigation measures were required.

The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Similar construction types and methods would occur with implementation of the project as were identified for the 2018 Community Plan. Mitigation Measures NOISE 5.5-2 and NOISE 5.5-3 would be implemented to reduce impacts from future development in the CP area consistent with the project. Consistent with the 2018 PEIR, impacts related to construction noise would be mitigated to below a level of significance, and impacts related to vibration would be significant and unavoidable after implementation of all feasible mitigation. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding temporary construction noise and vibration.

### 2.1.13 Paleontological Resources

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in development that requires:				
i. Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) Some of the CP area is underlain by the Mount Soledad Formation and the Bay Point Formation, which are considered to be of high sensitivity for fossil resources. However, the majority of the CP area is underlain by artificial fill. The 2018 PEIR concluded that grading activities associated with future discretionary and ministerial projects that require grading in excess of 1,000 cubic yards, extending to a depth of 10 feet or greater into high sensitivity formations, could result in significant impacts to paleontological resources. Mitigation Measure PALEO 5.14-1 was identified to reduce impacts (City of San Diego 2018b):

**PALEO 5.14-1:** Prior to the approval of subsequent discretionary development projects implemented in accordance with the proposed Midway-Pacific Highway CPU [Community Plan Update], the City shall determine the potential for impacts to paleontological resources within a high sensitivity formation based on review of the project application submitted and recommendations of a project-level analysis completed in accordance with the steps presented below. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City’s Paleontological Resources Guidelines and CEQA Significance Determination Thresholds. Monitoring for paleontological resources required during construction activities shall be implemented at the project level and shall provide mitigation for the loss of important fossil remains with future subsequent development projects that are subject to environmental review.

#### I. Prior to Project Approval

- a. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable United States Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:
  - Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resources potential geologic deposit/formation/rock unit.

- Require over 2,000 cubic yards of excavation and/or 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
  - Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix.
- b. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required and any identified resources shall be recovered.
- Monitoring is always required when grading on a fossil recovery site or a known fossil location.
  - Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum).
  - Monitoring may be required for shallow grading (<10 feet) when a site has previously been graded, and/or unweathered geologic deposits/formations/ rock units are present at the surface.
  - Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating, a Paleontological Mitigation Monitoring and Reporting Program shall be implemented during construction grading activities.

The 2018 PEIR concluded that because ministerial projects are not subject to a discretionary review process, there would be no mechanism to screen for grading quantities and geologic formation sensitivity and to apply appropriate requirements for paleontological monitoring. Thus, impacts related to future ministerial development would remain significant and unavoidable. Impacts related to future discretionary development would be reduced to less than significant.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Future development in the CP area consistent with the project could result in grading in high resource sensitive areas, which could result in the destruction of paleontological resources.

In 2018, the City adopted SDMC Section 142.0151, which provides specific requirements related to grading in paleontological sensitive areas. Pursuant to SDMC Section 142.0151, all development is required to screen for grading quantities and geologic formation sensitivity and

apply the appropriate requirements for paleontological monitoring. Paleontological monitoring is required for grading that extends 10 feet or greater in depth and involves 1,000 cubic yards or more within high sensitivity paleontological geological units and/or 2,000 cubic yards or more within moderate sensitivity paleontological geological units, grading on a fossil recovery site, or grading within 100 feet of the mapped location of a fossil recovery site. Implementation of the General Grading Guidelines for Paleontological Resources, as required by SDMC Section 142.0151, ensures that impacts to paleontological resources associated with future development would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding paleontological resources.

## 2.1.14 Population and Housing

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The 2018 PEIR determined that even though the 2018 Community Plan population would increase over time, the population growth would not introduce a significant impact. The 2018 Community Plan would serve as a comprehensive, long-term plan for the physical development of the CP area and would be intended to manage and address future growth to support transit use and multimodal mobility. The 2018 PEIR concluded that no impact on unplanned population growth would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, the CP area population would not increase beyond what was previously analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, no impact would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding unplanned population growth either directly or indirectly.

- b) The 2018 PEIR determined that the 2018 Community Plan would not displace people or existing housing because the 2018 Community Plan would designate planned land uses and zoning that would accommodate future development in the CP area. Therefore, no impact was identified in the 2018 PEIR, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the conclusion in the 2018 PEIR, the project would not displace any people or existing housing. No impact would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding displacement of housing or people.

### 2.1.15 Public Services and Facilities

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities (including police protection, parks, or other recreational facilities, fire/life safety protection, libraries, or schools), the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) **Police Protection:** The Western Division of the San Diego Police Department currently serves the CP area. The 2018 PEIR stated that it is likely that police response times in the CP area would continue to increase under the future development projections of the 2018 Community Plan, which could ultimately result in the need for new or expanded police services. However, as future development is proposed in the CP area, individual projects would be subject to applicable Development Impact Fees (DIF) for public facilities financing in accordance with SDMC Section 142.0640. The 2018 PEIR concluded that even though implementation of the 2018 Community Plan would result in an increase in overall population, the proposed increase in population would not require the San Diego Police Department to expand or construct new facilities. Therefore, impacts related to the expansion/construction of new facilities were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone’s height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The proposed population would not increase beyond what was previously analyzed in the 2018 PEIR. Future development consistent with the project would comply with the 2018 Community Plan policy to support operation of a police storefront in the CP area, if the need arises as future development projects in the CP area are brought forward. Consistent with the 2018 PEIR, implementation of the project would result in a less than significant impact associated with the construction of new police protection facilities. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the need for and/or provision of new or physically altered police protection facilities.

**Parks and Recreation:** There is an existing and projected deficit in population-based parks and recreational facilities in the CP area. The 2018 PEIR stated that while the 2018 Community Plan proposed park acreages and allowed for the development of parks, no specific facilities have been identified in the CP area; therefore, no specific impacts could be identified. The General Development Plan process for parks would be required for any park facility to determine use and layout of facilities, and without that information and process, no impacts can be identified. Individual park projects proposed in the CP area may require a project-level analysis at the time they are proposed based on the details of the parks and the existing conditions at the time such projects are pursued. Thus, although the existing and projected deficit in population-based parks and facilities would remain, the 2018 Community Plan contains policies to promote future parks and park equivalencies and facilitates the development of parks. Therefore, the 2018 PEIR concluded that a less than significant impact would occur, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The proposed population in the CP area would not increase beyond what was previously analyzed in the 2018 PEIR. Implementation of the project would provide policy support for increasing the acreage of parks and recreational facilities in the CP area but would not propose design and construction of new park facilities, consistent with the 2018 PEIR. Furthermore, the removal of the 30-foot height restriction has the potential to accommodate more park space because taller buildings would allow for achieving maximum density within a smaller building footprint. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the need for and/or provision of new or physically altered park and recreation facilities.

**Fire/Life Safety Protection:** The CP area is within the service area of the City's Fire-Rescue Department. The 2018 PEIR determined that the 2018 Community Plan would result in an increase in overall population. However, the proposed increase in population would not require the Fire-Rescue Department to expand or construct new facilities. As future development is proposed in the CP area, individual projects may be subject to payment of DIF, which would provide facilities financing in accordance with SDMC Section 142.0640. The 2018 Community Plan included a comprehensive Impact Fee Study that defined applicable DIF for future development, including funding for fire/life safety facilities. The Impact Fee Study included future projects to expand and replace existing fire stations in the area. Therefore,

impacts related to the expansion/construction of new fire facilities were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The proposed population in the CP area would not increase beyond what was previously analyzed in the 2018 PEIR. The project would support the 2018 Community Plan policy framework that addresses maintaining sufficient fire and rescue services throughout the CP area. In addition, consistent with the 2018 PEIR, future development consistent with the project would be required to pay applicable DIF, which would fund fire/life safety facilities. Similar to the conclusion in the 2018 PEIR, implementation of the project would result in less than significant impacts associated with the construction of new fire/life safety protection facilities. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding fire/life safety protection facilities.

**Libraries:** The Point Loma/Hervey Library in the Peninsula community and the Mission Hills Library in the Uptown community currently serve the CP area. The 2018 PEIR determined through correspondence with the Library Department that increases in population would not warrant the need for additional facilities to meet the library service requirement of the 2018 Community Plan. Because the 2018 Community Plan did not include the construction of library facilities, and facility needs would be met in the CP area, impacts related to library facilities were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The proposed population would not increase beyond what was previously analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, construction of library facilities is not proposed because facility needs would be met by the existing libraries in the area. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding libraries.

**Schools:** The San Diego Unified School District (District) provides public education services to the CP area. Dewey Elementary School is the only public school in the CP area. The 2018 PEIR determined that the cumulative potential increase in students from the number of future

additional housing units allowed in the 2018 Community Plan would likely impact District schools to the point of reaching or exceeding capacity, and new or expanded school facilities would be needed. Future residential development consistent with the 2018 Community Plan would be required to pay school fees as outlined in California Government Code, Section 65995; California Education Code, Section 53080; and Senate Bill 50 to mitigate any potential impact on District schools. The City is legally prohibited from imposing any additional mitigation related to school facilities through implementation of Senate Bill 50, and the District is responsible for potential expansion or development of new facilities. Therefore, the 2018 PEIR determined that impacts to schools would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The proposed population in the CP area would not increase beyond what was previously analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, future residential development consistent with the project would be required to pay school fees, and the District would be responsible for potential expansion of new facilities. In addition, future development consistent with the project would support several 2018 Community Plan policies related to school service, including coordinating with the District to explore options for the provision of additional school facilities, encouraging the establishment of public charter schools, and encouraging efficient use of land at Dewey Elementary School by increasing the number of classrooms while still maintaining sufficient outdoor space. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding schools.

## 2.1.16 Public Utilities

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in the use of excessive amounts of water beyond projected available supplies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Promote growth patterns resulting in the need for and/or provision of new or physically altered utilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, or other performance objectives?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in impacts to solid waste management, including the need for construction of new solid waste infrastructure including organics management, materials recovery facilities, and/or landfills; or result in a land use plan that would not promote the achievement of a 75 percent target for waste diversion and recycling as required under AB 341 and the City's Climate Action Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) The Water Supply Assessment prepared for the 2018 PEIR concluded that the 2018 Community Plan is consistent with water demand assumptions included in the regional water resource planning documents of the San Diego County Water Authority and the Metropolitan Water District. There is sufficient water supply to serve existing and projected demands of the 2018 Community Plan and future water demands in the Public Utilities Department service area in normal and dry year forecasts during a 20-year projection. Therefore, less than significant impacts to water supply were anticipated for implementation of the 2018 Community Plan, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. The project would service a similar population as analyzed under the 2018 PEIR. Consistent with the conclusion in the 2018 PEIR, sufficient water supplies are available to serve existing and projected demands of the project and future water demands in the Public Utilities Department's service area in normal and dry year forecasts. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding water supply.

- b) **Stormwater:** The 2018 PEIR determined that because the CP area is highly impervious and there is limited land available for new development, the volume or rates of runoff are not likely to be increased by new development. Future projects would be required to exercise strict adherence to existing stormwater regulations and conformance with the General Plan and 2018 Community Plan policies. Project-specific review under the Municipal Stormwater Permit would ensure that significant adverse effects related to the stormwater system and the installation of stormwater infrastructure would be avoided. In addition, the 2018 Community Plan did not identify any specific stormwater infrastructure improvements in conjunction with implementation of the project, and the location and extent of future facilities were not known at the time; therefore, no impacts could be identified. Thus, impacts related to stormwater facilities were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, the location and extent of future stormwater facilities are not known at this time, and it would be too speculative to identify specific impacts. In addition, future development consistent with the project would support 2018 Community Plan policies for the design of new stormwater facilities and improvements to both existing infrastructure and new private development. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding stormwater facilities.

**Sewer:** Sewer line upgrades are administered by the City's Engineering and Capital Projects Department and handled on a project-by-project basis. The 2018 PEIR determined that because future development under the 2018 Community Plan would likely increase demand, there may be a need to increase sizing of existing pipelines and sewer mains. However, the 2018 Community Plan did not identify any specific sewer infrastructure improvements that are proposed in conjunction with the plan, and the location and extent of future facilities were not known at the time; therefore, no impacts could be identified. The 2018 PEIR determined that impacts associated with sewer facilities would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR,

since the location and extent of future wastewater facilities are not known at this time, it would be too speculative to identify specific impacts. Any future development consistent with the project would be required to comply with the SDMC regulations regarding sewers and wastewater facilities (Chapter 6, Article 4) and would be required to follow the City's Sewer Design Guidelines. In addition, the project includes various policies for upgrading wastewater facilities within existing infrastructure. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding wastewater facilities.

**Water Facilities:** The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's Capital Improvements Program. These improvements are determined based on continued monitoring by the City's Engineering and Capital Projects Department – Engineering Division to determine remaining levels of capacity. The 2018 PEIR determined that as future development takes place in the CP area, demand for water is likely to increase and create a potential need to increase sizing of existing pipelines, mains, and treatment facilities. However, the 2018 Community Plan did not identify any specific water infrastructure improvements that were proposed in conjunction with the plan, and the location and extent of future facilities were not known at the time; therefore, no impacts could be identified. Therefore, the 2018 PEIR determined that impacts to water distribution and treatment facilities would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, because the location and extent of future water facilities are not known at this time, it would be too speculative to identify specific impacts. In addition, future development consistent with the project would be required to implement various 2018 Community Plan policies for upgrading water infrastructure to better serve the community. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding water facilities.

**Communications Systems:** Private utility companies currently provide communications systems in the CP area. The 2018 PEIR determined that as future development takes place in the CP area, demand for communications systems is likely to increase and create a potential need for expansion of facilities. However, the 2018 Community Plan did not identify any specific communications systems infrastructure improvements, and the location and extent of future facilities were not known at the time; therefore, no impacts could be identified. The

2018 PEIR determined that impacts to communications systems would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Consistent with the 2018 PEIR, since the location and extent of future communication facilities are not known at this time, it would be too speculative to identify specific impacts. Future siting of communications infrastructure would be in accordance with the LDC, including Section 141.0420 regulating wireless communications facilities, as well as the City's Wireless Communications Facility Guidelines, which seek to minimize visual impacts (City of San Diego 2019). Adhering to the General Plan policies supporting the City's utility undergrounding program would also minimize visual impacts of new facilities. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding communications systems.

- c) The 2018 PEIR compared solid waste disposal rates of the previous 1991 Community Plan with those attributed to the 2018 Community Plan in 2035 and found that the 2018 Community Plan would result in a decrease in tons of solid waste compared to the previously adopted plan. While density would increase under the 2018 Community Plan, decreases in certain types and amounts of land uses would cause an overall net decrease in solid waste generation. The 2018 PEIR concluded that a Waste Management Plan should be prepared for any project proposed under the 2018 Community Plan exceeding 60 tons of waste for projects of 40,000 square feet or more. Implementation of a Waste Management Plan would ensure that future development project impacts would be less than significant. Ministerial projects and discretionary projects that fall below the 60-ton threshold would be required to comply with the SDMC sections addressing construction and demolition debris, waste and recyclable materials storage, and recyclable materials (and in the future, organic materials) collection. Therefore, implementation of the 2018 Community Plan would not require increased landfill capacity, impacts associated with solid waste were determined to be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, solid waste generation rates for the project would be consistent with the 2018 PEIR. Consistent with the 2018 PEIR, a Waste Management Plan will be prepared for all future projects exceeding 60 tons of waste for projects

of 40,000 square feet or more. In addition, future projects would be required to comply with SDMC sections addressing construction and operation solid waste disposal, as well as policies for waste management in the General Plan. Impacts would be less than significant. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding solid waste.

### 2.1.17 Transportation and Circulation

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Since the adoption of the 2018 Community Plan, the City has updated its CEQA Significance Determination Thresholds (December) (City of San Diego 2020a) to reflect the implementation of its new transportation threshold. The new threshold identifies vehicle miles traveled (VMT), in lieu of level of service, as the metric of determining transportation impacts. The following section provides an analysis of the project’s impacts in comparison to the thresholds used in the 2018 PEIR and the City’s updated transportation significance thresholds.

a) Impacts of the 2018 Community Plan related to an increase in projected traffic were analyzed under future (year 2035) conditions with and without 2018 Community Plan implementation for study area segments, intersections, freeways, and freeway ramps. Impacts were evaluated against the City’s CEQA Significance Determination Thresholds in place at that time. The 2018 PEIR determined that the 2018 Community Plan would result in impacts to roadway segments, intersections, freeway segments, and ramp meters. Identified significant cumulative impacts to roadway segments included the following:

- **2018 PEIR Impact 5.2-1:** Three consecutive segments of Kettner Boulevard from Washington Street to Laurel Street.
- **2018 PEIR Impact 5.2-2:** Greenwood Street from Sports Arena Boulevard to Kurtz Street.

- **2018 PEIR Impact 5.2-3:** Camino Del Rio West from Rosecrans Street to I-5/I-8 ramps.
- **2018 PEIR Impact 5.2-4:** Dutch Flats Parkway from Barnett Avenue to Midway Drive.
- **2018 PEIR Impact 5.2-5:** Sassafras Street from Pacific Highway to Kettner Boulevard.
- **2018 PEIR Impact 5.2-6:** Two consecutive segments of Old Town Avenue from Hancock Street to San Diego Avenue.

Identified significant cumulative impacts to intersections included the following:

- **2018 PEIR Impact 5.2-7:** Lytton Street and Rosecrans Street in the AM and PM peak hours.
- **2018 PEIR Impact 5.2-8:** West Mission Bay Drive and I-8 westbound off-ramp in the PM peak hour.
- **2018 PEIR Impact 5.2-9:** Midway Drive and Sports Arena Boulevard/West Point Loma Boulevard in the PM peak hour.
- **2018 PEIR Impact 5.2-10:** Midway Drive and Rosecrans Street in the PM peak hour.
- **2018 PEIR Impact 5.2-11:** Hancock Street and Washington Street in the PM peak hour.
- **2018 PEIR Impact 5.2-12:** Kettner Boulevard and West Laurel Street in the PM peak hour.
- **2018 PEIR Impact 5.2-13:** Pacific Highway and Sassafras Street in the PM peak hour.
- **2018 PEIR Impact 5.2-14:** Pacific Highway and West Laurel Street in the AM and PM peak hours.
- **2018 PEIR Impact 5.2-15:** Nimitz Boulevard/Lowell Street and Rosecrans Street in the PM peak hour.
- **2018 PEIR Impact 5.2-16:** Moore Street and Old Town Avenue in the PM peak hour.

Identified significant cumulative impacts to freeway segments included the following:

- **2018 PEIR Impact 5.2-17:** I-5 northbound (AM and PM peak hours) and southbound (PM peak hour) from Clairemont Drive to Sea World Drive.
- **2018 PEIR Impact 5.2-18:** I-5 northbound from Sea World Drive to I-8 in the AM and PM peak hours.
- **2018 PEIR Impact 5.2-19:** I-5 northbound from Old Town Avenue to Washington Street in the AM and PM peak hours.
- **2018 PEIR Impact 5.2-20:** I-8 eastbound from Morena Boulevard to Hotel Circle Drive in the PM peak hour.
- **2018 PEIR Impact 5.2-21:** I-5 southbound from I-8 to Old Town Avenue in the PM peak hour.
- **2018 PEIR Impact 5.2-22:** I-5 southbound from Washington Street to Pacific Highway in the PM peak hour.
- **2018 PEIR Impact 5.2-23:** I-5 southbound from Laurel Street to Hawthorn Street in the PM peak hour.

Finally, a cumulative impact related to freeway ramp meters was identified on the I-5 southbound/Sea World Drive ramp in the PM peak hour (2018 PEIR Impact 5.2-24).

Mitigation Measures TRANS 5.2-1 through TRANS 5.2-16 were identified to reduce significant impacts to intersections and roadway segments; however, only Mitigation Measure TRANS 5.2-7b is included in the 2018 Community Plan's Impact Fee Study (IFS) (City of San Diego 2018b):

**TRANS 5.2-7b (Lytton Street & Rosecrans Street):** Add second southbound left-turn lane from Lytton Street to eastbound Rosecrans Street and implement right-turn overlap phases at all legs of the intersection. This improvement is identified in the Midway-Pacific Highway IFS.

Other identified mitigation measures that would reduce vehicular impacts were determined to be infeasible for several reasons, such as maintenance of consistency with the overall mobility vision, consistency with City goals and policies for walkable neighborhoods and multimodal facilities, lack of available right-of-way to accommodate additional lanes, maintenance of existing features, allowance for other proposed improvements, removal of on-street parking, and maintenance of geometric continuity along roadway segments.

Additionally, Mitigation Measures TRANS 5.2-17 through TRANS 5.2-24 would be implemented by Caltrans to reduce impacts to freeway segments and ramp meters; however, impacts to Caltrans facilities would remain significant and unavoidable because the City cannot ensure that the mitigation necessary to avoid or reduce impacts to a level below significance would be implemented before the occurrence of the impact. Therefore, impacts related to the increase in projected traffic were determined to be significant and unavoidable.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Traffic associated with the project would not be greater than the traffic volumes previously analyzed and disclosed in the 2018 PEIR. Mitigation Measure TRANS 5.2-7b would continue to be required with implementation of the project. Additionally, the SANDAG 2021 RP, adopted in December 2021, includes a more extensive regional transit network and active transportation network that would likely decrease regional traffic, including traffic associated with buildout of the CP area. Traffic associated with buildout of the CP area may be reduced compared to traffic in the 2018 PEIR analysis (Appendix A). Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding increases in projected traffic.

- b) The 2018 PEIR determined that the 2018 Community Plan would be consistent with adopted policies, plans, or programs supporting alternative transportation, specifically SANDAG's

2015 RP. The 2018 Community Plan would support implementation of the transit improvements identified in the 2015 RP by providing policies that support prioritizing the transit system and improving efficiency of transit services. Additionally, the project would provide planned alternative transportation facilities and policies that support improvements to pedestrian, bicycle, and transit facilities. Thus, the 2018 Community Plan was determined to have a less than significant impact related to conflicts with adopted policies, plans, or programs supporting alternative transportation, and no mitigation measures were required.

Following certification of the 2018 PEIR, an update to the 2015 RP, called the 2021 RP, was adopted in December 2021. The 2021 RP also includes a more extensive transit network and active transportation network compared to the 2015 RP. The CP area continues to be identified as a TPA, and the 2021 RP's proposed Central Mobility Hub is in the CP area. The Central Mobility Hub is envisioned to provide enhanced connections between the CP area and surrounding neighborhoods, Downtown San Diego, the SDIA, and major freeways through rail, bus service, and enhanced pedestrian and bicycle safety (SANDAG 2021). Additionally, the City has adopted a Complete Communities strategy that 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 project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The project would not result in any change to alternative transportation plans and policies outlined in the 2018 Community Plan. Allowable land use types and densities would remain the same. The 2021 RP, which includes the regional SCS, was based on planning assumptions at the time of plan preparation. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, the project would not conflict with the long-term planning incorporated into the 2021 RP. Additionally, the existing 2018 Community Plan Mobility Element is designed to implement the 2021 RP and Complete Communities strategy vision through complete streets improvements to accommodate transit service, enhanced pedestrian and bicycle facilities, and increased housing density in a TPA. No conflicts with the 2021 RP or Complete Communities strategy would occur. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding alternative transportation.

- c) Project impacts related to VMT are determined using the City's Transportation Study Manual (TSM) (September) (City of San Diego 2020b). Individual projects implemented under the 2018 Community Plan would be required to prepare transportation studies as applicable according to the TSM. Several types of projects are screened out of analysis in the TSM

because they are assumed to not have a significant VMT impact: projects in VMT-efficient areas, small (less than 300 average daily trips) projects, locally serving projects, affordable housing, some mixed-use projects, and some redevelopment projects. For redevelopment projects, a project would not have a VMT impact if the proposed use would result in less VMT than the previous use and the project would not reduce affordable housing. The 2018 Community Plan emphasizes the types of development that are considered less than significant related to VMT, including projects in TPAs, locally serving projects, affordable housing, mixed-use projects, and redevelopment. Additionally, implementation of the 2018 Community Plan Mobility Element would increase VMT efficiency in the area by improving the pedestrian and bicycle networks and increasing accessibility to transit. Additionally, VMT for baseline conditions and projected VMTs for the previous 1991 and 2018 Community Plans were calculated in the Transportation Impact Study prepared for the 2018 Community Plan (Chen Ryan 2017). Although buildout of the 2018 Community Plan was identified to result in a net increase in total VMT of 105,876 miles compared to baseline conditions, with the significant population increase anticipated in the community, the daily VMT by population is anticipated to drop dramatically (by 80.2 percent). The projected increase in regional population would occur with or without plan implementation. The 2018 Community Plan was identified to result in a decrease in per-capita VMT of approximately 55 percent compared to buildout of the previous 1991 Community Plan. Therefore, because the 2018 Community Plan would implement the types of land use development encouraged in the TSM to reduce VMT and would increase VMT efficiency compared to both existing and previous plan buildout conditions, impacts related to VMT would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Traffic generation would be the same as the traffic identified for the 2018 Community Plan (Appendix A). Future projects in the CP area consistent with the project would be required to comply with the City's TSM. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of significant impacts regarding VMT.

- d) The 2018 Community Plan includes a Mobility Element with the vision of an efficient and safe network for pedestrians, bicyclists, cars, and transit. Implementation of the Mobility Element policies would help improve safety for multimodal transportation compared to existing conditions. Example Mobility Element policies that would implement design features to improve safety include the following:

- **ME-3.1:** Provide and support a continuous network of safe, convenient, and attractive bicycle facilities that connect Midway-Pacific Highway to other communities and to the regional bicycle network.
- **ME-3.7:** Enhance safety, comfort, and accessibility for all levels of bicycle riders with improvements such as wayfinding and markings, actuated signal timing, bicycle parking, buffered bicycle lanes, and protected bicycle facilities.
- **ME-4.9:** Coordinate with MTS, North County Transit District, and the California Public Utilities Commission to reduce trolley, train, vehicle, and pedestrian conflicts. Strategies may include elevated tracks and platforms, rail realignment, vehicular and pedestrian safety improvements at existing rail crossings, and aesthetic improvements to strengthen pedestrian access and walkability. At-grade rail crossings that may be targeted for improvement are Noell Street, Washington Street, Sassafras Street, and Palm Street.
- **ME-5.1:** Provide a network of complete streets throughout the community that safely accommodates all travel modes and users of the right-of-way.
- **ME-5.3:** Implement focused intersection improvements to improve safety and operations for all travel modes.

Therefore, implementation of the 2018 Community Plan would improve safety in the CP area. Additionally, the land uses accommodated in the CP area are Residential and Commercial land uses that would not result in incompatible roadway use, such as operation of farm or other special equipment. Impacts related to roadway hazards would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Additionally, the project would not result in any changes to 2018 Community Plan Mobility Element policies. The project does not propose any unsafe design features or incompatible uses that would cause an increase in hazards compared to the 2018 Community Plan and the 2018 PEIR (Appendix A). Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of impacts regarding roadway hazards.

e) As discussed in Section 2.1.7(c), the 2018 PEIR concluded in Section 5.6, Health and Safety, that the 2018 Community Plan included improvements to the existing transportation infrastructure that could improve evacuation times. Therefore, it would not impair implementation of, or physically interfere with, Emergency Evacuation Plans. The 2018 Community Plan Mobility Element identifies improvements to existing transportation infrastructure that could improve

evacuation times. Likewise, infrastructure improvements could improve emergency response times. Design of future projects consistent with the 2018 Community Plan would be required to comply with existing building standards related to emergency access. Impacts would be less than significant, and no mitigation measures were required.

The project would be limited to the CP area footprint and land use, density, and zoning analyzed in the 2018 PEIR. The removal of the 30-foot height restriction would not result in a change to total allowable density buildout in the CP area; would not change the underlying base zone regulations, including the base zone's height limit; and would not allow development to extend beyond the footprint analyzed in the 2018 PEIR. Therefore, the project would not interfere with the San Diego County Emergency Operations Plan. Additionally, the project would not result in any changes to 2018 Community Plan Mobility Element policies (Appendix A). Future development would be required to comply with all applicable building standards. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of impacts regarding emergency access.

## 2.1.18 Visual Effects and Neighborhood Character

Would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Result in a substantial obstruction of a vista or scenic view from a public viewing area as identified in the community plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a substantial adverse alteration (e.g., bulk, scale, materials or style) to the existing or planned (adopted) character of the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in the loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in a substantial change in the existing landform?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Create substantial light or glare which would adversely affect daytime and nighttime views in the area.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a–e) The 2018 PEIR concluded that the 2018 Community Plan would have a less than significant impact regarding scenic vistas or views, neighborhood character, distinctive or landmark trees, landform alteration, and light and glare. However, the current project is proposing the removal of the existing 30-foot height limit in the CP area but would not change the underlying base zone regulations, including the base zone’s height limit. Due to this change, there is potential for the project to have a significant impact on visual effects and neighborhood character in the CP area. Therefore, a Visual Impact Analysis will be prepared, and this subject will be analyzed in a Supplemental EIR.

## 2.1.19 Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a–d) Since the preparation of the 2018 PEIR, the Wildfire section was added the CEQA Guidelines Appendix G IS checklist. However, this section only applies to projects within or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones. The CP area is primarily built-up/developed land and does not contain undeveloped land or canyon lands that could exacerbate wildfire risk. The CP area is not identified in a fire hazard zone of state or local responsibility according to CAL FIRE’s Fire Hazard Severity Viewer. Therefore, no further analysis of impacts from wildfire on the project is required. Exposure of people or housing to wildland fire impacts from the project compared to the 2018 Community Plan is discussed in Section 2.1.7(a) of this IS.

## 2.1.20 Mandatory Findings of Significance

Does the project:	Impact Adequately Examined in 2018 PEIR	Impact Not Adequately Examined in 2018 PEIR		
		No Impact	Less Than Significant Impact	Potentially Significant Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Note:** Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino, (1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

- a) All applicable mitigation measures identified in the 2018 PEIR to avoid and reduce impacts are integrated into the project, and with the integration of these measures, the project would not substantially degrade the quality of the environment. As described in Section 2.1.3, Biological Resources, the project would not significantly affect fish or wildlife habitat or species. The site is devoid of sensitive biological resources, and no mitigation measures are required.

As described in Section 2.1.8, Historical and Tribal Cultural Resources, future development in the CP area consistent with the project would have the potential to result in the alteration of a historic building, structure, object, or site; alteration or destruction of prehistoric or historical archaeological resources, objects, or sites; impacts to religious or sacred uses; disturbance to human remains considering proximity to the community of Old Town; and impacts to TCRs. Implementation of Mitigation Measures HIST 5.3-1 and HIST 5.3-2 would reduce impacts. However, similar to the 2018 PEIR, the degree of future impacts and applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future

project. Therefore, impacts to historical and archaeological resources and TCRs would be significant and unavoidable.

- b) Consistent with the 2018 PEIR, the project would contribute to direct and cumulative significant and unavoidable impacts regarding transportation and circulation, historical and archaeological resources, and TCRs. The project would contribute to cumulative significant and unavoidable impacts regarding paleontological resources. The project proposes the removal of the existing 30-foot height limit in the CP area. Due to this change, there is potential for the project to have a significant cumulative impact on visual effects and neighborhood character in the CP area. Therefore, a Visual Impact Analysis will be prepared, and this subject will be analyzed in a Supplemental EIR.
- c) Implementation of the project would not result in substantial adverse effects on human beings beyond those analyzed in the 2018 PEIR. No conditions have changed, and no new information has become available since certification of the 2018 PEIR that would alter this analysis. No additional mitigation is available to reduce the project's contribution to these impacts. Other impacts with the potential to affect human beings were determined to be less than significant.

*This page intentionally left blank.*

## Section 3 References

---

- ALUC (Airport Land Use Commission). 2014. Airport Land Use Compatibility Plan for the San Diego International Airport.
- CAL FIRE (California Department of Forestry and Fire Protection). 2022. CAL FIRE's Fire Hazard Severity Zones Viewer. Access March 2022. <https://egis.fire.ca.gov/FHSZ/>.
- CARB (California Air Resources Board). 2005. Air Quality and Land Use Handbook: A Community Health Perspective. April.
- CARB. 2017. California's 2017 Climate Change Scoping Plan. November. Accessed March 2022. [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf).
- Chen Ryan (Chen Ryan Associates). 2017. Midway-Pacific Highway & Old Town Mobility Element Updates Transportation Impact Study. December.
- City of San Diego. 1998. Multiple Species Conservation Program Plan. Final.
- City of San Diego. 2008. City of San Diego General Plan. March 10. Accessed March 2022. <https://www.sandiego.gov/planning/genplan>.
- City of San Diego. 2015. Climate Action Plan.
- City of San Diego. 2017. Drainage Design Manual.
- City of San Diego. 2018a. Midway-Pacific Highway Community Plan.
- City of San Diego. 2018b. Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report.
- City of San Diego. 2019. Wireless Communication Facility Guidelines.
- City of San Diego. 2020a. CEQA Significance Determination Thresholds. December.
- City of San Diego 2020b. Transportation Study Manual. September.
- City of San Diego. 2021. Stormwater Standards Manual.
- City of San Diego. 2022. San Diego Municipal Code. Accessed March 2022. <https://www.sandiego.gov/city-clerk/officialdocs/municipal-code>.
- County of San Diego. 2018. San Diego County Emergency Operations Plan.
- Port of San Diego. 2021. Port Master Plan Update. Draft. November. Accessed March 2022. <https://pantheonstorage.blob.core.windows.net/waterfront-development/Port-Master-Plan-Update-Draft-Tracked-Changes-Version-November-2021.pdf>.
- SANDAG (San Diego Association of Governments). 2011. 2050 Regional Transportation Plan/Sustainable Communities Strategy. October. Accessed March 2022. [https://www.sandag.org/uploads/2050RTP/F2050rtp\\_all.pdf](https://www.sandag.org/uploads/2050RTP/F2050rtp_all.pdf).
- SANDAG. 2021. 2021 Regional Plan. December 10. Accessed March 2022. <https://sdforward.com/mobility-planning/2021-regional-plan>.

*This page intentionally left blank.*

## **Appendix A. Transportation Impact Analysis**

---

*This page intentionally left blank.*



TO: Kristin Blackson, PMP; Senior Project Manager; Harris & Associates  
FROM: Phuong Nguyen, TE, Senior Transportation Engineer; CR Associates  
DATE: March 8, 2022  
RE: Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit- Transportation Impact Analysis

---

The purpose of this technical memorandum is to document potential transportation impacts associated with the Removal of the Midway-Pacific Highway Community Planning Area from the Coastal Height Limit (Project). The Project calls for the removal of the 30-foot building height limit in the Midway-Pacific Highway Community Planning Area, but does not change the underlying base zone regulations, including the base zone's height limit.

## Background

In 1972, City of San Diego (City) voters passed Proposition D. Proposition D was a citizens' initiative that amended the San Diego Municipal Code (Municipal Code) to impose a 30-foot height limit on buildings constructed in the City's Coastal Height Limit Overlay Zone.

The Coastal Height Limit Overlay Zone, as defined by Proposition D and included in the Municipal Code, includes the City's land and water area from the northern City limits, south to the border of Mexico, extending seaward to the outer limit of the City's jurisdiction and inland to Interstate 5 on January 1, 1971 (Municipal Code Section 132.0505[b]). The Municipal Code Sections 132.0505(b) (1) through (4) identify areas where the Coastal Height Limit does not apply.

On September 17, 2018, the City Council adopted the Midway-Pacific Highway Community Plan Update (Community Plan), including the certification of the Midway-Pacific Highway Community Plan Update Revised Final Program Environmental Impact Report (PEIR, Project No. 561546/SCH No. 2015111013). The Community Plan, as adopted, includes up to 11,585 residential dwelling units and 10,091,215 SF of non-residential land uses (see Table 3-4 and Table 3-5 of the PEIR).

In November 2020, the Project was put to ballot and passed by meeting the simple majority (50%+1) voting requirement. The Project does not include approval of any specific developments and does not change the underlying base zone regulations, including the base zone's height limit. Any proposed future developments must comply with all governing laws at the time that the development project application is submitted to the City. Building height would still be regulated by zoning laws in the Municipal Code and any height restrictions associated with an adopted Airport Land Use Compatibility Plan (ALUCP).

## Analysis

The analysis presented below provides a program-level review to determine whether the Project would change the transportation impact findings identified in the PEIR. Since the adoption of the Community Plan, the City has updated its California Environmental Quality Act (CEQA) Significance Determination Thresholds (December 2020) to reflect the implementation of the new transportation

threshold. The new threshold identifies Vehicle Miles Traveled (VMT), in lieu of Level of Service (LOS), as the metric of determining transportation impacts.

When comparing the thresholds utilized in the PEIR to the latest City’s CEQA transportation thresholds, a total of five (5) topics are applicable to this analysis. **Table 1** provides a side-by-side comparison of these thresholds.

**Table 1 – CEQA Thresholds - Transportation**

Threshold	Included in the PEIR?	Included in Current Thresholds?
1. Result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?	Yes	No
2. Conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	Yes	Yes
3. Result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?	No	Yes
4. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	Yes
5. Result in inadequate emergency access?	No	Yes

Analysis of the Project against the applicable CEQA thresholds is provided below:

1. *Does the Project result in an increase in projected traffic, which is substantial in relation to the existing traffic load and capacity of the street system including roadway segments, intersections, freeway segments, interchanges, or freeway ramps?*

While the Project calls for removing the 30-foot building height limit, it does not propose more intensive land uses, zoning, or density than those adopted in the 2018 Community Plan and analyzed in the PEIR and does not change the underlying base zone regulations, including the base zone’s height limit. Thus, traffic associated with the Project would not be greater than what was already analyzed and disclosed in the PEIR. Additionally, with the adoption of the SANDAG Regional Transportation Plan (2021 RTP), which includes a more extensive transit network and active transportation network, traffic associated with the Project would likely decrease from what was shown in the PEIR.

2. *Does the Project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?*

The Project does not propose any change to the currently adopted transit, roadway, bicycle, and pedestrian facilities, as well as mobility policies. Therefore, the Project would not conflict with any

adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities.

3. *Does the Project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?*

While the Project calls for removing the 30-foot building height limit, it does not propose more intensive land uses, zoning, or density than those adopted in the 2018 Community Plan and analyzed in the PEIR and does not change the underlying base zone regulations, including the base zone's height limit. The Project also does not propose to change the land use or zoning designations, thus, VMT associated with the Project would not be greater than what was already analyzed and disclosed in the PEIR.

4. *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 change to the currently adopted transportation network, nor does the Project propose any unsafe design feature or incompatible uses that would cause an increase in hazards when compared to the currently adopted Community Plan and analyzed in the PEIR.

5. *Result in inadequate emergency access?*

The Project does not propose any change to the currently adopted transportation network or land uses. Therefore, the Project would not result in inadequate emergency access, when compared to the currently adopted Community Plan and analyzed in the PEIR.

## **Conclusion**

As shown above, the Project would not result in an inconsistency with the analysis in the 2018 PEIR, nor would the Project exceed any of the thresholds set in the City's CEQA Significance Determination Thresholds (December 2020). Therefore, no additional transportation-related impact would be identified as a result of the Project.

