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March 17, 2023  
Project No: 22-12938

Roberto Yano, P.E., Director of Public Works  
City of National City  
1243 National City Boulevard  
National City, California 91950  
Via email: [ryano@nationalcityca.gov](mailto:ryano@nationalcityca.gov)

**Subject: Eastside I-805 Community Greenbelt Project Statutory Exemption Memorandum**

Dear Mr. Yano:

The purpose of this memorandum is to identify how the Eastside I-805 Community Greenbelt Project (project) in the City of National City, San Diego County, California meets the provisions of Senate Bill 922 (SB 922), which provides a Statutory Exemption from the California Environmental Quality Act (CEQA). The exemption recognizes that transportation projects like trails, transit centers, and rights-of-way (ROW) improvements intended to promote transit, cycling and pedestrian modes, have the potential to lower carbon emissions from the transportation sector and are exempt from CEQA when certain criteria are met. This memorandum will accompany a Notice of Exemption (NOE) for the project.

## Project Objective, Location, and Description

National City has experienced underutilization of public ROW and a buildup of chronic waste and debris along the project corridor due to varying slopes, dense vegetation, lack of lighting, and lack of visibility. The proposed project would address these issues through the cleanup of waste, debris, and dense vegetation, in addition to several beautification elements. The project would be funded through the Clean California Grant in coordination with the California Department of Transportation (Caltrans), as a portion of the project corridor is located within or directly adjacent to the Caltrans ROW associated with Interstate 805 (I-805).

The project corridor would encompass approximately 1.2 miles and would result in a widened and paved Class I multi-use path (approximately 0.3 miles) with landscape improvements along a previously disturbed dirt path within National City and Caltrans ROW between Division Street and 4<sup>th</sup> Street, east of I-805 in National City. South of 4<sup>th</sup> Street, the project would result in bicycle and pedestrian improvements in existing paved City ROW on T Avenue from 4<sup>th</sup> Street to 8<sup>th</sup> Street, on Paradise Drive from 8<sup>th</sup> Street to 12<sup>th</sup> Street, on 12<sup>th</sup> Street from Paradise Drive to Grove Street, on Grove Street, and on Plaza Boulevard from Grove Street to Euclid Avenue. Improvements within the City ROW would include entry monuments on Division Street and 4<sup>th</sup> Street, curb extensions, high-visibility crosswalks, wayfinding signage, landscape improvements, rectangular rapid-flashing beacons, traffic calming measures, such as bulbouts and speed humps, and stormwater enhancements for increased natural water treatment. The project would also result in the conversion of a currently vacant dirt area within public ROW on the corner of Plaza Boulevard and Euclid Avenue into a Community Plaza consisting of decorative paving, landscaping improvements, new fencing, and wayfinding signage.



The project corridor is predominately flat with a gentle slope from approximately 132 feet above mean sea level (amsl) at the project's northern terminus near Division Street to approximately 112 feet amsl at the project's southeast terminus near the intersection of Plaza Boulevard and Euclid Avenue. Adjacent land uses include I-805 and associated Caltrans ROW west of the project corridor, residential development north and east of the project corridor, and commercial development south of the project corridor. El Toyon Elementary School and Rancho de la Nación Elementary School are located approximately 450 feet east of the project's northern terminus, National City Fire Station 33 is located approximately 650 feet east of the project corridor, and Paradise Valley Hospital is located approximately 0.25 mile east of the project corridor.

## Senate Bill 922

SB 922, signed into law in the 2022 legislative session, amends Public Resources Code (PRC) Sections 21080.20 and 21080.25 to exempt specific transportation projects, such as pedestrian and bicycle facilities, from full environmental review under CEQA. SB 922 facilitates projects that broaden California's development of sustainable transportation facilities through streamlining of CEQA review requirements. As such, the SB 922 exemption omits many sustainable transportation projects, including improvements for walking, biking, public transit efficiency and wayfinding, rail stations, zero-emission transit refueling facilities, and carpooling, from in-depth CEQA review. This exemption expires at the end of 2029. Lead agencies must file an NOE when pursuing an exemption under SB 922.

## Consistency Analysis

SB 922 specifically exempts "pedestrian and bicycle facilities that improve safety, access, or mobility, including new facilities, within the public right-of-way" (PRC Section 21080.25(b)(1)). The project qualifies for a Statutory Exemption under SB 922 as a pedestrian and bicycle facility within the public ROW because the project involves the widening and paving of a Class I multi-use path in addition to bicycle and pedestrian improvements in City and Caltrans ROW. Therefore, the project is exempt from CEQA requirements pursuant to PRC Section 21080.25.

A project exempt from CEQA under SB 922 must also be in conformance with the additional requirements articulated in PRC Section 21080.25(c). The analysis below demonstrates how the project meets each of the SB 922 stipulations.

*(1) A local agency is carrying out the project and is the lead agency for the project. (Section 21080.25 (c)(1)).*

The project would be carried out by the City of National City, which would also serve as the lead agency. All decisions made by the lead agency will be subject to approval by the National City Council. Therefore, this project meets this requirement.

*(2) The project does not induce single-occupancy vehicle trips, add additional highway lanes, widen highways, add physical infrastructure or striping to highways, or include the addition of any auxiliary lanes. (Section 21080.25 (c)(2))*

The project would not add any automobile capacity; rather, the project would add to or improve existing bicycle and pedestrian infrastructure along the 1.2-mile project corridor. As the project would improve alternative transportation opportunities, the project may reduce overall automobile usage in the vicinity of the project corridor. Therefore, the project would not induce single-occupancy vehicle trips, add



highway lanes, widen highways, add physical infrastructure or striping to right, or add auxiliary lanes, and meets this requirement.

*(3) Construction of the project does not require the demolition of affordable housing units. (Section 21080.25 (c)(3))*

The project would not require the demolition of any affordable housing units. The project corridor would travel through a residential neighborhood from 4<sup>th</sup> Street to Plaza Boulevard within the existing ROW on paved roadways. Construction of the bicycle and pedestrian improvements would not necessitate the demolition of housing units, affordable or otherwise. Therefore, the project meets this requirement.

PRC Section 21080.25(d) and (e) include additional requirements for projects exceeding \$100 million dollars in cost and \$50 million dollars in cost, respectively. The project currently has a construction budget of \$4,998,761. This is substantially lower than the \$100 and \$50 million thresholds. Funding for the project is provided by a grant through the Caltrans Clean California Grant. That awarded grant totals approximately \$4,298,522. Therefore, the project would not be required to comply with the additional requirements under PRC Section 21080.25(d) and (e).

## Conclusion

Based on the analysis documented throughout this memorandum, the proposed project meets all criteria for a Statutory Exemption from CEQA. Therefore, it is concluded that the project is statutorily exempt from CEQA pursuant to PRC Section 21080.25, as amended and enacted by SB 922.

Sincerely,

**Rincon Consultants, Inc.**

Taylor Freeman, MEERM  
Project Manager

Rich Daulton, MURP  
Principal/Vice President