San Diego Unified Port District
P.O. Box 120488
San Diego, California 92112-0488
(619) 686-6283

NOTICE OF PREPARATION
of a
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT TITLE: **NATIONAL CITY BAYFRONT PROJECTS & PLAN AMENDMENTS (UPD #EIR-2018-232)**

APPLICANT/ PROPONENT: San Diego Unified Port District, City of National City, GB Capital Holdings, Pasha Automotive Services

LOCATION: National City, California (see Figure 1)

REFERENCE: California Code of Regulations, Title 14, Sections 15082(a), 15103, 15375.

The San Diego Unified Port District (District) will be the Lead Agency in preparing an Environmental Impact Report (EIR) for the project (proposed project or project) identified above. The District is soliciting input and feedback from various agencies, stakeholders, and the public pertaining to the scope and content of the environmental information that will be included in the EIR. For certain agencies, this may be germane to statutory responsibilities in connection with the proposed project. An agency may need to use the proposed project's EIR when considering its permit or other approval for the project. The project description, location, and possible environmental effects of the proposed project are contained in the attached materials.

Due to the time limits mandated by state law, your comments on environmental concerns must be sent at the earliest possible date but no later than **5:00 p.m. on Thursday, January 31, 2019**. Comments should be mailed to: San Diego Unified Port District, Planning Department, 3165 Pacific Highway, San Diego, CA 92101 or emailed to: abuzaiti@portofsandiego.org.

A public scoping meeting regarding the proposed EIR will be held on Thursday, January 24, 2019 from 6:00 p.m. to 8:00 p.m. at the National City Aquatic Center, 3300 Goesno Place, National City, CA 91950.

For questions on this Notice of Preparation, please contact Anna Buzaitis, Program Manager, at (619) 686-7263.

Signature: _____ Date: 12/19/18

Lesley Nishihira
Director, Planning

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INTRODUCTION

Publication of this Notice of Preparation (NOP) initiates the San Diego Unified Port District's (District's) environmental review and analysis of the National City Bayfront Projects and Plan Amendments Project (project or proposed project) pursuant to the California Environmental Quality Act (CEQA). The NOP is the first step in the CEQA process. It describes the proposed project and is distributed to responsible agencies, trustee agencies, involved federal agencies, and the general public. As stated in State CEQA Guidelines Section 15375, the purpose of the NOP is "to solicit guidance from those agencies as to the scope and content of the environmental information to be included" in the Environmental Impact Report (EIR). The NOP provides an opportunity for agencies and the general public to comment on the scope and content of the environmental review of a proposed project.

The proposed project would include:

- Changes to land and water use designations in the District's Port Master Plan (PMP);
- Amendments to the City of National City's (City's) Local Coastal Program (LCP), General Plan, Harbor District Specific Area Plan, Land Use (Zoning) Code, and Bicycle Master Plan that would include changes to jurisdictional boundaries; changes to subarea boundaries; and changes to land use, specific plan, and zone designations (City Program – Plan Amendments);
- Construction and operation of a recreational vehicle (RV) park, modular cabins, dry boat storage, up to four hotels, and an expanded marina (GB Capital Component);
- Construction and operation of a rail connector track and storage track (Pasha Rail Improvement Component);
- Closure of Tidelands Avenue between Bay Marina Drive and West 32nd Street as well as West 28th Street between Tidelands Avenue and Quay Avenue and redesignation of the area from Street to Marine-Related Industrial in the District's PMP (Pasha Road Closures Component);
- Construction and operation of Segment 5 of the Bayshore Bikeway (Bayshore Bikeway Component); and
- Construction and operation of hotel, restaurant, retail, and/or a combination of tourist/visitor-serving commercial development north of Bay Marina Drive and the

potential closure or narrowing of Bay Marina Drive west of Marina Way to through vehicular traffic (City Program - Development).

The proposed PMP Amendment (PMPA) and corresponding LCP Amendment (LCPA) to clarify jurisdictional land use authority, redesignate land uses and the balancing of commercial and maritime uses is herein referred to as the "Balanced Plan."

The Balanced Plan, GB Capital Component, Pasha Rail Improvement Component, Pasha Road Closures Component, and a portion of the Bayshore Bikeway Component are all within the District's jurisdictional boundaries. Consequently, changes proposed by these components would require an amendment to the PMP, collectively "Port Master Plan Amendment Component" or "PMPA Component," as follows:

- Incorporate the Balanced Plan, GB Capital Component, Pasha Rail Improvement Component, and the alignment of the Bayshore Bikeway into the PMP;
- Remove the Street designation for the street closures associated with the Pasha Road Closures Component and redesignate these areas as Marine-Related Industrial; and
- Additionally, approximately 11.50 acres of Balanced Plan, located mostly on the GB Capital site east of the mean high tide line and owned in fee by the District, would be added to the PMP.

Most of the proposed Bayshore Bikeway Component and the entire proposed City Program are within the City's jurisdiction. Consequently, the City Plan Amendments would be as follows:

- Remove the approximately 11.50 acres of the Balanced Plan, located mostly on the GB Capital site east of the mean high tide line and owned in fee by the District, from the City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, and Land Use Code to reflect changes in land use and jurisdictional authority;
- Incorporate seven parcels north of Bay Marina Drive and adjacent rights-of-way into the Harbor District Specific Area Plan; and
- Amend the Bicycle Master Plan to reflect the realignment of the Bayshore Bikeway.

Future development within the City's jurisdiction may require Coastal Development Permits (individually, CDP and collectively, CDPs) and other development permits such as planned development permits, conditional use permits, subdivision/parcel maps, street vacations, and other discretionary or ministerial entitlements to implement the project.

PROJECT PROPONENT(S)/APPLICANT(S)

- San Diego Unified Port District
- City of National City
- GB Capital Holdings
- Pasha Automotive Services

PROJECT LOCATION

As depicted in Figure 1, the proposed project is located in National City, California, within the jurisdictions of the San Diego Unified Port District (District) and City of National City. The location of a project component is referred to as a project site, and collectively the locations of the project components are referred to as the "project sites." The project sites are generally accessed by Marina Way, Bay Marina Drive, and Tidelands Avenue, and are generally bordered by industrial uses and Civic Center Drive on the north, the Sweetwater Channel on the south,

the San Diego Bay National Wildlife Refuge (Sweetwater Marsh Unit) and Interstate 5 to the east, and the National City Marine Terminal (NCMT) to the west.

PROJECT DESCRIPTION

The proposed project includes both landside and waterside components, as well as amendments to the District's PMP and the City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan. The following subsections describe the key project components in detail and as depicted in Figure 2.

Marina District Balanced Land Use Plan Component (Balanced Plan)

The proposed project would include adoption and implementation of the National City Marina District Balanced Land Use Plan (Balanced Plan), which covers an approximately 60.9-acre area north of the Sweetwater Channel in the District's land use jurisdiction, as shown on Figure 3. The Balanced Plan proposes to reconfigure areas within the Marina District that are designated within the PMP as Park/Plaza, Commercial Recreation, Marine Terminal, Marine-Related Industrial, Recreational Boat Berthing, and Street land uses. The Balanced Plan's proposed land use redesignations and associated policies proposed for the amendments to the District's PMP and the City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan are necessary to carry out the GB Capital Component, Pasha Rail Improvement Component, and Pasha Road Closures Component, as described above. Consequently, the project components are intrinsically part of the Balanced Plan. The specific transportation improvements, public access improvements, and land/water use designation changes included in the Balanced Plan and how they relate to the different project components are described below.

Transportation Improvements

The Balanced Plan consists of several proposed transportation improvements:

- Realign Marina Way from its existing alignment to form a curve that rounds out to the west when traveling toward the Balanced Plan area and connect to the proposed new park entrance (Proposed/new Road D1). Utilities would be relocated from the existing Marina Way right-of-way (ROW) to the realigned Marina Way ROW. The realigned Marina Way ROW, which is proposed to be approximately 70 feet wide, is identified as Road D3 (realigned Marina Way) in Figures 3 and 4. The GB Capital Component, discussed below, proposes a configuration of the realigned Marina Way that is slightly varied from the configuration proposed under the Balanced Plan.
- Close West 32nd Street east of Tidelands Avenue, allowing for the realignment of Marina Way as proposed above, as shown on Figure 4. Potential relocation of utilities is also proposed.
- Add a connector rail track to provide an additional point of connection between the existing rail yard along the west side of Marina Way and the east side of the National Distribution Center, north of the Balanced Plan area, to the existing rail line north of the existing West 32nd Street and west of Tidelands Avenue. A storage track may be also be provided north of and parallel to the connector rail track. The area between the realigned Marina Way/Road D3 and connector rail track would form a buffer area that could accommodate the required rail service area (i.e., 15-foot-wide setback from rail track) on the southern side of the connector rail track. The location of the connector rail track is shown on Figure 3. This connector rail track is also part of the Pasha Rail Improvement Component discussed below.

- Close the southern half of the existing Goesno Place south of West 32nd Street to vehicular traffic and relocate the northern portion of the road to the east, as shown as "new Road D2" in Figure 4, providing access to the GB Capital/Pier 32 Marina site from the proposed realigned Marina Way. Potential relocation of utilities is also proposed.
- Shift the southern terminus of Tidelands Avenue to the east, as shown in Figures 3 and 4 (identified as Proposed Road D1), to accommodate a reconfigured historical first point of rest (FPR).

Public Access Improvements

The Balanced Plan consists of several public access improvements:

- Increase Pepper Park by over 2.5 acres—approximately 1.52 acres to the northwest, and approximately 1-acre to the north and east—as shown on Figure 5. The Pepper Park expansion, which may also include a reconfiguration of the layout of the existing Pepper Park, has not yet been designed; however, several potential park components are being analyzed in this EIR as a "worst-case scenario" for environmental impacts.
- Provide a 100-foot habitat buffer from the delineated wetlands west of the Wildlife Refuge (Paradise Marsh) and a 200-foot building setback from the western edge of the Wildlife Refuge. Vehicular parking and low-impact non-motorized uses such as public access trails and bike paths could be located between the habitat buffer and building setback. The habitat buffers are shown on Figure 13.
- Provide a north–south public access corridor, allowing visual, pedestrian, bicycle, and emergency vehicle access within the existing alignment of Marina Way, as shown on Figure 5. The north–south public access corridor would range from 20 to 40 feet wide and be centered on the existing 20-foot-wide view corridor at Pier 32 Marina. The primary use of the north–south public access corridor would be for pedestrians and bicyclists, and no vehicular parking, permanent structures, or other impediments to access would be allowed. The Bayshore Bikeway may be routed through this corridor. Modifications to this north-south public access corridor is proposed as part of the GB Capital Component, as discussed below.
- Provide an east–west public access corridor, allowing visual, pedestrian, bicycle, and emergency vehicle access within the existing alignment of West 32nd Street, as shown on Figure 5. The east–west public access corridor would range from 14 to 40 feet in width. This east–west public access corridor would be for pedestrians and may also include an ancillary bicycle path; however, no vehicular parking, permanent structures, or other impediments to access would be allowed. Modifications to this east-west public access corridor is proposed as part of the GB Capital Component, as discussed below.

Proposed Pepper Park Expansion and Reconfiguration

Pepper Park is proposed to be expanded by approximately 2.54 acres, from approximately 5.22 acres to approximately 7.76 acres. Existing amenities include a boat launch ramp, picnic tables, restrooms, fishing pier, floating boat dock, and playground equipment. The park has approximately 71 parking spaces and consistent with the District's ordinances, is open between the hours of 6:00 a.m. and 10:00 p.m.

Although the Pepper Park expansion has not yet been designed, for the purpose of providing a "worst-case scenario" for the environmental analysis, it is anticipated that the following features may be implemented:

- Reconfiguration of the existing Pepper Park layout, which may include a mixture of hardscape (e.g., paved plazas, shade structures) and new landscaping (e.g., landscaped berms, open lawn).
- An amphitheater.
- An interactive fountain/splashground.

An optional feature to the Pepper Park expansion is the City-requested relocation of the City-owned historic Granger Hall to Pepper Park. If Granger Hall is relocated to Pepper Park, it could be used as a restaurant or a special event center.

The park expansion/reconfiguration could result in additional opportunities for larger and more frequent organized events. No revisions to the boat launch ramp facility are proposed.

Proposed Land and Water Use Designation Changes

The Balanced Plan proposes several changes to existing land and water use designations (see Figure 3 for proposed land/water use configuration and roadway locations):

- Increase the overall designated Commercial Recreation area by approximately 1.17 acres, for a total of 17.39 acres. The land use changes would encompass the area located generally southeast of the realigned Marina Way. Additionally, approximately 0.3 acre of Commercial Recreation would be redesignated to Park/Plaza to allow for the expansion of Pepper Park (see below). See *GB Capital Component*, for a description of the development proposed for this area.
- Increase the designated Park/Plaza area by approximately 2.54 acres, for a total of 10.33 acres. The land use change would occur to the north, west, and east of the existing Pepper Park (also see discussion under *Proposed Pepper Park Expansion and Reconfiguration*).
- Reduce the designated Recreational Boat Berthing area by approximately 0.59 acre, for a total of 16.80 acres, by redesignating the land area (i.e., jetty) along the southern boundary of the marina that separates the marina from Sweetwater Channel from Recreational Boat Berthing to Commercial Recreation. This area is currently designated with water use designation of Recreational Boat Berthing and is proposed to be revised to the land use designation of Commercial Recreation to better reflect the existing and proposed condition of the area being land and not water. This jetty is part of the development proposed by GB Capital, as described below in *GB Capital Component*.
- Reduce the designated Marine Terminal area that is the historic FPR by approximately 0.62 acre. Specifically, Pepper Park would be expanded to the northwest into approximately 1.52 acres of the designated Marine Terminal area; however, the designated Marine Terminal area would be expanded eastward (north of the existing footprint of Pepper Park) by approximately 0.90 acre (due to the entrance into the park area being narrowed and realigned – see “new Road D1” on Figure 3), for a total of 6.76 acres (see Figure 3).
- Reconfigure and reduce the designated Marine-Related Industrial areas north of the proposed realigned Marina Way by approximately 0.4 acre, for a total of 6.49 acres.
- Reduce the designated Street land use area by 2.15 acres, for a total of 3.14 acres.

Table 1 summarizes the Port Master Plan (i.e., District jurisdiction) land/water use changes proposed by the Balanced Plan.

Table 1. Balanced Plan Area Existing and Planned Land and Water Uses for the Port Master Plan

Land/Water Use	Existing Area (acres)	Proposed Area (acres)	Difference (acres)
Marine Terminal	7.38	6.76	-0.62
Marine Related Industrial	6.89	6.49	-0.40
Commercial Recreation	16.22*	17.39	+1.17
Recreational Boat Berthing	17.34	16.80	-0.54
Park/Plaza	7.79	10.33	+2.54
Street	5.29	3.14	-2.15
Total	**60.91**	**60.91**	**--**

*Includes areas that are currently designated "Commercial Tourist" in the City's Local Coastal Program, but are being incorporated into the PMP to reflect the District's land use authority and jurisdiction.

Proposed Use Modifications to National City Aquatic Center

No land use changes are proposed to the aquatic center as part of the project; it is located in Pepper Park, and the Pepper Park expansion is anticipated to be designed around the facility. The proposed project includes modifications to existing operational restrictions in the CDP for the facility that limit existing operations and utilization of the facility[1]. Specifically, the project proposes to amend the CDP to eliminate the following restrictions:

- Class sizes are limited to a 1:6 instructor-to-student ratio.
- Water equipment rentals (e.g., kayaks, rowboats) must be docent supervised.
- Participation in aquatic center programming shall not be denied based the financial ability/inability to pay.
- Existing buoys in the Sweetwater Channel, south of Pier 32 Marina, are in place to prevent encroachment into the adjacent refuge.
- Most aquatic center participants will arrive in groups by bus.

The project also proposes to expand the allowed uses at the aquatic center to provide for more flexibility and to increase public utilization of the facility. More specifically, a portion of the facility may be used for educational aquaculture or environmental conservation uses, including small-scale research and development opportunities.

In addition, the project proposes to relocate the buoys located south of Pier 32 Marina in order to allow non-motorized watercraft to access the area farther to the east in Sweetwater Channel. The buoys would be relocated to the east side of the San Diego Gas & Electric (SDG&E) property and former railroad bridges, north and south of the channel, as shown in Figure 6. The proposed relocation of the buoys would still prevent encroachment into the refuge.

With the operational restrictions reduced and the allowed uses modified, it is anticipated that more people would visit the aquatic center under the proposed project. For example, it is also reasonably foreseeable that there will be more public interest in individual water equipment rentals, which are currently prohibited by the CDP.

[1] While these proposed modifications have separate and independent utility, they are being analyzed as part of the proposed project for efficiency.

GB Capital Component

In addition to the land and water use redesignations and transportation improvements, needed for the GB Capital Component noted above in the Balanced Plan discussion, the component would include construction and operation of an RV park, modular cabins, dry boat storage, up to four hotels, and additional moorings and improvements to the marina. In addition, as discussed above, this component would implement a new road alignment for Marina Way, public access/view corridors, and bicycle and pedestrian paths. All of the landside improvements would generally be developed within the Commercial Recreation land use designation that is proposed as part of the Balanced Plan. The majority of this component would be developed in the first phase, which is anticipated to be operational by 2022. The second phase includes up to four hotels, which would be operational based on market demand, anticipated to be developed by 2025.

The GB Capital Component would incorporate native plantings and non-invasive ornamental plants, drought-tolerant, low-maintenance plants that are well adapted to bayfront conditions throughout the project area. Hardscape materials, consistent with the character of the existing marina, would include permeable paving (porous asphalt, concrete pavers, and decomposed granite). The development would include view corridors and trails that would be connected to the adjacent marina and Pepper Park. Low-level lighting that is sensitive to the adjacent refuge and wetlands is proposed. Figures 7 and 8 show the Phase I and Phase II conceptual site plans. Figures 9 through 12 depict renderings of the hotels, dry storage, and proposed 11-story hotel tower.

Phase 1 would include the following:

- Construct and operate up to 135 sites at a proposed RV resort, including ancillary facilities such as a laundry room, swimming pool, and other support facilities. Privacy plantings and/or fencing would be incorporated into the design of the RV Park. This would generally be located on Parcels B3, B6, B7, and B8 of the Balanced Plan.
- Construct and operate approximately 40,000 square feet of dry boat storage, which would be capable of storing up to 210 boats. The boats would be kept in racks housed within up to five separate structures, each with a maximum height of 65 feet, in the area west of the realigned Marina Way/Road D3 roadway. The dry boat storage facilities would be constructed of COR-TEN® steel and perforated metal; the ground surface under the storage racks would be porous gravel or pavers. Two 500-gallon fuel tanks (diesel and gasoline) with containment would be located on the site. Siting dry boat storage in this location (west of the proposed GB Capital alignment of the realigned Marina Way/Road D3 roadway, as shown on Figure 7) would require the following modifications to the land use configuration identified in the Balanced Plan:
    - Narrowing and shifting the realigned Marina Way/Road D3 to the southeast from the alignment identified in the Balanced Plan.
    - After narrowing and shifting the realigned Marina Way/Road D3, a portion of the area between the proposed connector rail track (see *Pasha Rail Improvement Component*) and realigned roadway would be changed to a Commercial Recreation land use to allow for dry boat storage instead of the wider realigned Marina Way/Road D3 that is in the Balanced Plan. This road narrowing and shifting from a width of approximately 70 feet under the Balanced Plan, to a width of approximately 50 feet under the GB Capital Component, would accommodate approximately 1.3 acres of Commercial Recreation space northwest of the realigned Marina Way/Road D3.

  - Overall, the GB Capital Component would have approximately 0.6 acre more Commercial Recreation space than the Commercial Recreation space in the Balanced Plan. This is due to the shifting/narrowing of the realigned Marina Way/Road D3 (as discussed above), which would not only accommodate Commercial Recreation space for dry boat storage northwest of the realigned roadway, but the southeastward shift would also reduce the size of the Commercial Recreation parcels immediately southeast of the realigned roadway.

- Construct and operate up to 60 modular cabins, which would serve as independent accommodations with kitchenettes, bathrooms, and sleeping quarters, generally on Parcels B1 and B11 of the Balanced Plan. The jetty area east of the mean high tide line is currently under a long-term lease between the District and the California Department of Transportation (Caltrans).
- Construct a new, approximately 10,000-square-foot, two-story administration/recreation building adjacent to the existing marina buildings. The new structure would be constructed of wood and glass materials.
- Construct a new, approximately 4,000-square-foot, two-story building with restrooms, laundry facilities, and staff support services in the vicinity of the existing marina buildings. The building would be constructed of wood and glass materials, and would be located on Parcel B2;
- Construct a new, approximately 4,000-square-foot maintenance building and associated approximately 8,200-square-foot maintenance yard, northeast of the proposed dry boat storage described above. The existing maintenance space on Pier 32 Marina would be relocated into this new maintenance area. As with the existing space, the new maintenance area would be used to store maintenance items such as parts, tools, paint, and supplies such as those for cleaning and landscaping. The new maintenance area is also proposed to be used by boat owners (or authorized personnel) to perform light boat maintenance such as cleaning, waxing, touch-up painting, and minor repair activities for boat electronics and engines. Heavy repairs or painting boat bottoms would not be performed on site. This maintenance space would also have a separate wash down area for the boats.
- Construct and maintain an approximately 24-foot-wide public access corridor down the existing alignment (north–south orientation) of Marina Way, in the general area identified in the Balanced Plan. This corridor, identified as the “Central Promenade” on the GB Capital plans (see Figures 7 and 8), would accommodate mainly pedestrians and bicycles but would also serve as a driveway for the occasional car or RV. The northernmost part of the Central Promenade would be 50 feet wide.
- Construct and maintain a minimum 24-foot-wide, east–west view corridor with a parking area, drive aisle, and an approximately 6-foot-wide sidewalk through the existing Pier 32 Marina parking lot, in the general area identified in the Balanced Plan.
- Construct and maintain a minimum 24-foot-wide, north–south view corridor with a roadway and sidewalk through the proposed Road D1.
- Construct and maintain a minimum 24-foot-wide north–south view corridor with a roadway and sidewalk through the proposed Road D2.
- Construct and maintain a Class I bicycle path approximately 30 feet east of Parcel B6 and west of the Wildlife Refuge/Paradise Marsh, within the western part of the “low-impact uses buffer” identified on Figure 13. This location is between the potential Routes

1 and 3 of the Bayshore Bikeway in this area (see *Bayshore Bikeway Component* below).

- Construct and maintain a pedestrian path and other approved recreational amenities generally east of Parcel B6 of the Balanced Plan area and west of the Wildlife Refuge/Paradise Marsh, within the western part of the "low-impact uses buffer" identified on Figure 13, with public access connecting to the existing marina, consistent with the Balanced Plan.
- Construct and maintain up to 20 moorings in Sweetwater Channel, south of the jetty, the majority of which (13 mooring) would be east of the mean high tide line and outside District jurisdiction.
- Construct an approximately 620-foot-long and 8-foot-wide floating dock that includes up to 30 fingers, which together total approximately 7,000 square feet, in the channel south of the jetty and proposed modular cabins. Gangways that are approximately 80 feet long and 5 feet wide are proposed to be located on the east and west ends of the floating dock to attach it to the jetty. The floating dock would be open to the public during operational hours at the marina.
- Construct an approximately 580-foot-long and 8-foot-wide dock with two 80-foot-long and 5-foot-wide gangways, which together total approximately 5,000 square feet, within the existing marina basin north of the jetty. This would allow additional boats to be side-tied to the dock.
- Allocate an area for future development of infrastructure to support aquaculture in Sweetwater Channel east of the proposed moorings, the majority of which would be east of the mean high tide line and outside District jurisdiction. The portion outside of District jurisdiction is on Caltrans property.
- Construct and maintain an approximately 4,400-square-foot pier platform at an angled southwesterly orientation, of which approximately 1,200 square feet would be over water (with an angled width of approximately 70 feet—one side having a length of approximately 100 feet, and the other side having a length of approximately 50 feet), with floating docks (approximately 120 feet long and 6 feet wide), and two gangways (approximately 80 feet long and 5 feet wide) immediately northeast of the National City Aquatic Center. When not in use (i.e., placing boats from dry boat storage into the water or removing them from the water), the pier platform and gangway would be open to the public. The pier platform, floating docks, and gangways, which would be located within part of the park expansion area of the Balanced Plan (northeast of the Aquatic Center), would serve the dry boat storage area proposed as part of the GB Capital Project, as well as the general public as a viewing platform.

Phase 2 would construct and operate up to four hotels of varying sizes and room counts:

- Construct and operate an up to three-story hotel with up to 40 rooms generally on Parcel B1 of the Balanced Plan.
- Construct and operate an up to four-story building, the first floor of which would include approximately 16,500 square feet of retail space. The upper three stories would house a hotel with up to 60 rooms. All would be constructed generally on Parcel B6 of the Balanced Plan.
- Construct and operate an up to 11-story hotel with up to 282 rooms generally on Parcel B3 of the Balanced Plan.

- Construct and operate an up to four-story hotel with up to 81 rooms, also generally on Parcel B3 of the Balanced Plan.

In order to accommodate the hotels on Parcels B3 and B6, it may be necessary to remove up to 65 RV spaces. Parking for the GB Capital Project would be available on site. Phase 1, as described above, would include up to 406 vehicle parking spaces, including one vehicle parking space within each RV site. Phase 2, as described above, would include up to 820 vehicle parking spaces, including one vehicle parking space within each RV site. Additionally, GB Capital is seeking permission from SDG&E to use a parcel east of the existing marina to accommodate additional parking.

Pasha Rail Improvement Component

Existing Rail Operations in National City

Trains that service the NCMT and surrounding industrial properties in the City of National City are owned and operated by BNSF. Empty railcars are currently stored at the BNSF National City Yard, the Cesar Chavez BNSF Yard (south of Downtown San Diego), and the NCMT on-terminal rail ladder.[2] The BNSF National City Yard, which is owned by BNSF, currently serves several industrial customers in the area, including Pasha.

The movement of railcars outside of the NCMT is dictated by rail labor union contracts. For example, movement of railcars north of the switch location near the intersection of Civic Center Drive/Harbor Drive must be done by BNSF. In addition, although BNSF can store empty railcars at the BNSF National City Yard, moving those empty railcars to the on-terminal rail ladder requires a BNSF crew to move the railcar to the switch location first. Once south and west of the switch, Pasha's crew can move the railcars. Other than when a train is being moved on or off the terminal, BNSF rail crews are not available, which creates an operational constraint for Pasha.

Independent of Pasha, BNSF has a vehicle transport business that uses some space in National City, on BNSF-owned properties located east of Tidelands Avenue, north and south of Bay Marina Drive. The BNSF operation consists of an inbound/southbound train that uses a mix of bi-level and tri-level railcars, which are loaded with vehicles for BNSF customers, not Pasha customers. Those railcars are unloaded in National City, on the BNSF-owned property, and become the empty railcars that Pasha may use for its outbound/northbound rail operations. The BNSF inbound/southbound operation results in approximately 12–15 tri-level railcars per week that are not used by Pasha and, as a result, sit empty on the rail ladder where Pasha builds/loads outbound trains. Approximately once per week, BNSF pulls the empty tri-level railcars out of the area.

Bi-level railcars can fit taller/higher-profile vehicles, such as SUVs, which cannot fit on the tri-level railcars. A bi-level railcar can fit 10 vehicles. A tri-level railcar can fit 15 vehicles. The use of bi-level railcars versus tri-level railcars is dependent on the type of vehicle that will be placed on the railcar. High-profile (i.e., taller) vehicles, such as SUVs, are the bulk of Pasha's rail transport; these vehicles require bi-level railcars and do not fit in tri-level railcars. Based on historical data (between 2013 and 2017), approximately 40% of the vehicles that arrived at NCMT by vessel were distributed by rail, whereas the remaining 60% were distributed by truck.[3]

[2] A rail ladder is a staging area with sufficient rail capacity to build and spot trains.

[3] The percentage split for transport by rail versus transport by truck is dependent on the type of vehicle/Pasha customer (e.g., Kia or Volkswagen). For example, Kia was a Pasha customer through early 2017, and Kia required that Pasha transport all Kia vehicles on rail. The split can vary from year to year, depending on the customer mix and their respective business requirements.

Proposed Rail Improvements on Lot K

Existing train activities on and around NCMT are constrained by the freight train operating windows and limitations on the length of trains. Moreover, the frequent insufficient supply of empty railcars, as well as related storage (see discussion above under *Existing Rail Operations in National City*), further constrains train operations. The Pasha Rail Improvement Component would include construction and operation of a connector track and a storage track west of the realigned Marina Way/Road D3 roadway identified in the Balanced Plan. This project component would allow Pasha to load trains more efficiently, as discussed below. The alignments of the connector track and storage track are shown on Figure 14, and are also identified on Parcels B4 and B5 of the proposed Balanced Plan (see Figure 3).

The connector track would connect the existing rail and loop track on the NCMT, west of the National Distribution Center, to additional railcar storage at the existing BNSF National City Yard, just east of the National Distribution Center. The storage track would provide additional railcar storage by adding a second track parallel to and north of the connector track. Figure 14 identifies the locations of the existing National Distribution Center, the existing BNSF National City Yard, the proposed connector track, and the proposed storage track. The project does not propose to remove any existing rail track.

Connector Track

The BNSF National City Yard has eight tracks, switches, and can hold approximately 50 rail cars. BNSF can use the rail yard either for multi-level auto rail cars or for storage for manifest train rail cars, giving them more flexibility for operations. As discussed above, the connector track portion of the Pasha Rail Improvement Component would improve efficiencies for Pasha's operations at NCMT. The improved efficiencies are due to Pasha no longer requiring BNSF to pull empty railcars north of the NCMT to the switch near Civic Center Drive and Harbor Drive and then having to send them back to the NCMT on the loop track, which can take a considerable amount of time because it requires dependence on BNSF rail crews. Instead, empty railcars could be pulled on the connector track directly from BNSF's National City Yard to the loop track on NCMT, resulting in reduced maneuvering and quicker train build times. The reduced maneuvering and quicker train builds would result from (1) the shorter distance required to pull the railcars (from the BNSF National City Yard instead of up to the switch near Civic Center Drive/Harbor Drive) and (2) the ability to avoid relying on BNSF crew availability to pull the railcars through the switch location by using Pasha employees using a small railcar mover. A comparison of the existing and proposed train movements is shown in Figure 15.

Notably, although the connector track would reduce the number of maneuvers and the time associated with these actions, it would not significantly increase throughput compared to existing conditions.[4] The connector track, however, could better assist Pasha in accommodating the additional vehicle throughput analyzed in the NCMT Tank Farm EIR. The NCMT Tank Farm EIR analyzed a projected annual increase in throughput of 210,818 vehicles. That EIR assumed that existing trains run 6 days per week (Monday through Saturday), for a total of 300 days per year, and that the project would thus require additional annual railcar space for up to

[4] Throughput is a function of land availability, vehicle dwell time, and accessibility to empty railcars. In terms of land availability, the connector track would not increase available land, but under the Balanced Plan there would be a net loss of land available for Pasha. Regarding vehicle dwell time, the connector track would not necessarily decrease dwell time because dwell time is largely dependent on the vehicle manufacturer and the dealer (i.e., when the dealer is able to take possession of the vehicle). In terms of accessibility to empty rail cars, the connector track could theoretically increase the accessibility of empty railcars by providing a more direct link to the BNSF National City Yard; however, the availability of the empty railcars would still be dependent on whether BNSF has empty railcars and provides them to Pasha.

94,868 vehicles, which could be accommodated by adding a Sunday train to the weekly train schedule.

Storage Track

The proposed storage track would add approximately 2,000 feet of train storage, which would accommodate the storage of approximately 18–20 railcars. The storage track would allow the approximately 12–15 empty tri-level railcars, that Pasha cannot use on a weekly basis, to be stored off the on-terminal rail ladder. However, providing an additional railcar storage area would not significantly increase vehicle throughput, particularly if only tri-level cars are available, because they are unable to accommodate larger vehicles such as SUVs, which is the bulk of Pasha's rail transport needs. (The purpose of bi-level versus tri-level railcars is discussed above under *Existing Rail Operations in National City*.) The consumer demand for SUVs, and other high-profile vehicles such as trucks, is market driven and heavily dependent on gasoline prices. This new car market trend for SUVs and trucks, versus traditional sedans (i.e., low-profile vehicles), is anticipated to continue for the foreseeable future; thus, bi-level railcars are anticipated to continue to be in high demand at NCMT. While these tri-level railcars are waiting to be removed from the NCMT rail ladder by BNSF, the railcars impact Pasha's regular rail activities, causing inefficiencies for Pasha to build a train. The storage track, therefore, would provide a place for these empty tri-level railcars to be stored, off the main on-terminal rail ladder. Having these empty railcars off the on-terminal rail ladder would allow regularly scheduled inbound/southbound trains to improve efficiency upon arrival. A less congested rail ladder on terminal creates a smoother, more routine flow of railcars, which supports more efficient operations for Pasha[5].

Existing Pasha Operations in National City

Pasha handles vehicles, breakbulk and general cargo in National City. Although Pasha's operations in National City involve both vehicle and non-vehicle throughput (i.e., breakbulk and other general cargo), the vast majority of Pasha's operations involve vehicle throughput, as shown in Table 2 for years 2013 through 2017.

Table 2. Pasha Vehicle and Non-Vehicle Throughput from 2013–2017

Year	Vehicles (Units)	Containers (Metric Tons)	Breakbulk (Metric Tons)
2013	361,372	15,484	37,295
2014	401,180	18,916	20,916
2015	425,890	6,928	78,966
2016	451,612	370	6,265
2017	371,827	105	41,812
Average 2013–2017	**402,376**	**8,361**	**37,051**

Source: Port District Maritime Division, November 2018

[5] Having railcars available at NCMT in a more consistent fashion allows Pasha to use employees more efficiently because there is more certainty that the necessary railcars will be available for operations and reduces the need to rely on BNSF.

As shown in Table 2, the amount of non-vehicle throughput is a relatively small share of Pasha's overall operations. Therefore, the proposed project assumptions provided below consider the reasonably foreseeable worst-case scenario for the proposed project, based on the maximum theoretical vehicle throughput.

Existing Pasha Operations in Balanced Plan Area – Lots J and K

Pasha currently handles vehicle throughput on Lot J (south of 32nd Street, north of the Pepper Park parking lot) and Lot K (north of 32nd Street, between Tidelands Avenue and Marina Way), both of which are identified in Figure 16. Lot J and Lot K are approximately 3.35 acres and 11.37 acres, respectively, and together total approximately 14.72 acres. The criteria used to determine this "existing" per acre per year calculation includes the total number of vehicles processed in a given year and the total acreage used to process that quantity of vehicles. Vehicular throughput is a function of land availability, vehicle dwell time, accessibility to empty railcars, and market demand for vehicles (which can also influence the former two factors). Due to those limiting factors, the annual vehicle throughput at NCMT has varied since 2013, as shown in Table 2.

As noted in Table 2, in the most recent complete year (2017), Pasha processed 371,827 vehicles, whereas the year before that (2016), Pasha processed 451,612 vehicles. Given this fluctuation, District staff concluded that a baseline that accounts for vehicle throughput over a five-year average provides a more accurate measure of the current/baseline level of vehicle throughput against which to evaluate the proposed project impacts. Therefore, the baseline for this analysis is the average annual vehicle throughput from 2013 to 2017 (i.e., the average of the five years of vehicle throughput that occurred prior to issuance of the NOP). Additionally, the total amount of acreage used has also varied annually since 2013, with an average of 180 acres used from 2013 to 2017, as shown in Table 3.

Table 3. Pasha Annual Acreage Used 2013–2017

Year	**Acreage Used[6]**
2013	158
2014	170
2015	191
2016	191
2017	191
Average 2013–2017	**180**

Source: Port District Maritime Division, November 2018

Based on the same methodology for calculating "existing per acre annual vehicle throughput" that was used in the EIR for the "National City Marine Terminal Tank Farm Paving and Street Closures Project and Port Master Plan Amendment" (NCMT Tank Farm EIR),[7] the existing

[6] Approximate net acreage available for auto storage. Acreage with buildings or other uses (i.e., maintenance, landscaping) is not included in this total.

[7] San Diego Unified Port District. 2016. *National City Marine Terminal Tank Farm Paving and Street Closure Project & PMPA Draft EIR*. Available https://www.portofsandiego.org/public-

annual throughput is 2,235 vehicles per acre,[8] which equates to a total of approximately 32,899 vehicles per year for Lots J and K collectively, as shown in Table 4.

Table 4. Existing Vehicle Throughput on Existing Lot J and Lot K

Site	Existing Acreage	Existing Throughput/Existing Baseline (2,235 vehicles/acre/year)
Lot J	3.35	7,487
Lot K	11.37	25,412
TOTAL	**14.72**	**32,899**

Proposed Pasha Operations in Balanced Plan Area – Lots J and K

Implementation of the proposed project would result in all of Lot J, as well as a portion of Lot K, being transferred from use by Pasha to use by GB Capital as part of the proposed GB Capital Project component. This would decrease the land available within the Balanced Plan area for Pasha's operations by approximately 8.23 acres (from the existing 14.72 acres to approximately 6.49 acres).

In the NCMT Tank Farm EIR, the methodology used to calculate the proposed vehicle throughput, or maximum theoretical throughput, consisted of a conservative analysis that factored in a dwell time[9] of 10.9 days, and a maximum number of vehicles per acre (154 vehicles per acre). The proposed vehicle throughput is the maximum theoretical capacity of each acre of terminal land. This methodology identified that up to 5,157 vehicles per year *could* be handled on each acre at NCMT.[10] The difference between the proposed vehicle throughput per acre (5,157 vehicles) and the "existing throughput" per acre was what was evaluated in the NCMT Tank Farm EIR as the potential throughput increase associated with the NCMT Tank Farm project.

The same methodology that was used in the NCMT Tank Farm EIR to determine the potential throughput increase can be used to determine the change in throughput potential associated with the proposed project. A maximum theoretical throughput of 5,157 vehicles per acre per year is still applicable because the factors that are included in that calculation are still valid, including the maximum number of vehicles that can fit on one acre at one time (154 vehicles), and the use of a 10.9 day dwell time, which provides for a more conservative analysis than if the current average dwell time of over 20 days was used to determine maximum theoretical throughput.

As discussed above, under the proposed project Pasha's operations within the Balanced Plan area would be decreased by approximately 8.23 acres (from the existing 14.72 acres to

records/all?keyword=Tank+Farm+EIR&topic=&location=&category=93&sort_by=search_api_relevance&sort_order=DESC.

[8] 402,376 vehicles ÷ 180 acres = 2,235 vehicles/acre; 2,235 vehicles/acre is the "existing per acre baseline;" 14.72 acres x 2,235 vehicles/acre = 32,899 vehicles/year.

[9] Dwell time is the time between when a vehicle enters NCMT and when it leaves NCMT by either truck or rail. The average dwell time from 2014 to 2017 was over 20 days; 10.9 days provides for a more conservative analysis.

[10] [(154 vehicles/day/acre) x (365 days/year)] ÷ 10.9 day dwell time = 5,157 vehicles/acre/year.

approximately 6.49 acres). As shown in Table 5, this lower acreage (6.49 acres) still has the potential to result in an additional 570 vehicles per year.

Table 5. Existing and Proposed Vehicle Throughput for Lot J and Lot K

Site	Existing Acreage	Existing Throughput/ Existing Baseline (2,235 vehicles/ acre/year)	Proposed Acreage	Proposed Throughput (5,157 vehicles/ acre/year)	Net Change (Proposed – Existing
Lot J	3.35	7,487	0	0	-7,487
Lot K	11.37	25,412	6.49	33,469	8,057
TOTAL	**14.72**	**32,899**	**6.49**	**33,469**	**570**

Pasha Road Closures Component

Pasha also proposes the Pasha Road Closures Component, which includes closure of Tidelands Avenue between Bay Marina Drive on the north and West 32nd Street on the south, as well as West 28th Street between Quay Avenue and Tidelands Avenue. Tidelands Avenue between Bay Marina Drive and West 32nd Street is an access road to the back gate of the NCMT; it also serves as an access road to the main entrance of Pepper Park. The existing roadways bifurcate marine terminal operations. Their closure would increase operating efficiencies by eliminating certain internal fences and drive aisles and consolidating the two truck-away locations down to one, a reduction in the truck-away footprint of approximately 0.5 acre.[11] The road closures total approximately 6.07 acres, of which approximately 5.76 acres is within the District's jurisdiction, and the remaining approximately 0.31 acre is within the City's jurisdiction. The area of the road closures located within the District's jurisdiction would require changing the land designation from Street to Marine-Related Industrial. This land use change would require a PMPA. Table 6 summarizes the land and water use changes proposed for the Balanced Plan area and the Pasha Road Closures Component within the District's jurisdiction.

The approximately 0.3 acre of the Pasha Road Closures Component (the portion between the mean high-tide line north to Bay Marina Drive) within the City's jurisdiction would require an amendment to the City's General Plan Circulation Element, Roadway Classifications.

The road closures are proposed to occur in two phases: (1) Tidelands Avenue between West 28th Street and West 32nd Street and (2) Tidelands Avenue between West 28th Street and Bay Marina Drive as well as West 28th Street between Tidelands Avenue and Quay Avenue.

[11] The truck-away footprint is an off-terminal location where trucks are loaded. Off-terminal in this case is where security credentials (e.g., a Transportation Worker Identification Credential) are not required. Currently, because of the non-contiguous lots used for Pasha operations, there are two truck-away locations. If the Pasha Road Closures Component is implemented, there would be more contiguous space for Pasha's operations, with less fencing, and the ability to reduce two truck-away locations down to one. Having fewer barriers within Pasha's operational footprint reduces the amount of required travel and the number of movements, and allows trucks to load more efficiently at one location versus two locations.

Table 6. Balanced Plan and Pasha Road Closures Components – Existing and Planned Land and Water Uses Areas within the District's Jurisdiction

Land/Water Use	Balanced Plan – Existing Area (acres)*	Balanced Plan – Proposed Area (acres) *	Pasha Road Closures – Existing Area (acres)**	Pasha Road Closures – Proposed Area (acres)**	Proposed Totals
Marine Terminal	7.38	6.76	0.00	0.00	**6.76**
Marine-Related Industrial	6.89	6.49	0.00	5.76	**12.25**
Commercial Recreation	16.22***	17.39	0.00	0.00	**17.39**
Recreational Boat Berthing	17.34	16.80	0.00	0.00	**16.80**
Park/Plaza	7.79	10.33	0.00	0.00	**10.33**
Street	5.29	3.14	5.76	0.00	**3.14**
Total	**60.91**	**60.91**	**5.76**	**5.76**	**66.67**

Note: The Pasha Road Closures (Tidelands Avenue between Bay Marina Drive and West 32nd Street, and West 28th Street between Quay Avenue and Tidelands Avenue) are not part of the Balanced Plan.

* Within the Balanced Plan area.

** Within the Pasha Road Closures area.

***Includes 11.46 acres of land that is currently designated "Commercial Tourist" in the City's Local Coastal Program, but is being incorporated into the PMP to reflect the District's land use authority and jurisdiction. For simplification purposes, this existing "Commercial Tourist" acreage is included in the "Commercial Recreation" acreage.

As noted previously, vehicle throughput is a function of land availability, vehicle dwell time, accessibility to empty railcars, and market conditions. The road closures would have no effect on vehicle dwell time, accessibility to empty railcars, or market conditions, and is proposed to be used for truck away activities, and not explicitly for vehicle storage/processing. However, to provide a more conservative analysis, this EIR will analyze the 6.07 acres being used for Pasha's vehicle throughput operations. Maximum theoretical throughput on 6.07 acres of land could be up to 31,303 vehicles per year[12], as shown in Table 7.

Table 7. Existing and Proposed Vehicle Throughput for Pasha Road Closures Component

Site	Acreage under Proposed Project	Existing Throughput	Proposed Throughput (5,157 vehicles/acre/ year)	Difference (Potential minus Existing)
Pasha Road Closures	6.07	0	31,303	31,303

[12] Existing Throughput = 0 vehicles; Potential Throughput = 5,157 vehicles/acre/year (see Footnote 10); 6.07 acres x 5,157 vehicles/acre/year = 31,303 vehicles/year

Summary of Existing and Proposed Pasha Operations – Lot J, Lot K, and Pasha Road Closures Site

The changes in proposed land availability for Pasha within the Balanced Plan area and the Pasha Road Closures site are summarized in Table 8.

Table 8. Summary of Land Availability for Pasha within Balanced Plan and Pasha Road Closures Components Areas

Location	Existing	Proposed	Difference
Balanced Plan Area			
Lot K	11.37	6.49	-4.88
Lot J	3.35	0.00	-3.35
Pasha Road Closures Area	0.00	6.07	+6.07
Total	**14.72**	**12.56**	**-2.16**

The existing vehicle throughput on Lot J, Lot K, and the Pasha Road Closures site, and the potential maximum theoretical throughput on the proposed Lot J, Lot K, and the Pasha Road Closures site, and the difference between each is provided in Table 9.

Table 9. Comparison of Existing Vehicle Throughput and Maximum Theoretical Vehicle Throughput for the Proposed Project

Site	Existing Acreage	Existing Throughput, Existing Baseline (2,235 vehicles/ acre/year)	Proposed Acreage	Maximum Theoretical Throughput (5,157 vehicles/ acre/year)	Net Change
Lot J	3.35	7,487	0	0	-7,487
Lot K	11.37	25,412	6.49	33,469	+8,057
Pasha Road Closures	6.07	0	6.07	31,303	+31,303
TOTAL	**14.72**	**32,899**	**12.56**	**64,772**	**+31,873**

The NCMT Tank Farm EIR analyzed, among other things, a potential increase in throughput on the existing Lot J and Lot K, and therefore, a part of the potential increase in vehicle throughput associated with the proposed project site has already been analyzed in the NCMT Tank Farm EIR.[7] To determine the difference for what was analyzed as the potential throughput increase on (the existing) Lot J and Lot K in the NCMT Tank Farm EIR, and the potential throughput increase associated with the proposed project (see Table 9), the per acre calculations based on the "existing throughout" from the NCMT Tank Farm EIR needs to be calculated for the existing acreage of Lot J and Lot K; this calculation is shown in Table 10.

Table 10. Comparison of Existing and Proposed Vehicle Throughput for Existing Lot J and Lot K, per NCMT Tank Farm EIR

Site	Existing Acreage	Existing Throughput used in NCMT Tank Farm EIR Existing Condition (2,287 vehicles/acre/year)	Maximum Theoretical Throughput (5,157 vehicles/acre/ year)	Net Change
Lot J	3.35	7,661	17,276	+9,615
Lot K	11.37	26,003	58,635	+32,632
Total	**14.72**	**33,664**	**75,911**	**+42,247**

As shown in Table 9, the proposed project has the potential to increase vehicle throughput by approximately 31,873 vehicles per year over existing conditions. Comparing the proposed project's potential increase in annual vehicle throughput of 31,873 vehicles to the annual vehicle throughput that was analyzed in the NCMT Tank Farm EIR for Lot J and Lot K (42,247 vehicles, per Table 10), the proposed project would decrease the throughput potential by 10,374 vehicles per year.[13] This is a comparison of what was analyzed in the NCMT Tank Farm EIR for the existing Lot J (3.35 acres) and the existing Lot K (11.37 acres), and the difference between the maximum theoretical throughput/capacity and the existing throughput (i.e., "Maximum Theoretical Throughput" minus "Existing Throughput, Existing Baseline") for the proposed project site, which includes Pasha operations on a modified Lot K (6.49 acres) and the Pasha Road Closures (6.07 acres).

Bayshore Bikeway Component

An alignment of the Bayshore Bikeway Component would extend generally from Civic Center Drive on the north to West 32nd Street on the south, via McKinley Avenue and Marina Way. The Bayshore Bikeway Component is proposed to be a Class I bike path that traverses the City's LCP and some areas of the District's PMP. This alignment would be located away from active marine terminal and maritime-related industrial areas. Figure 17 shows each of the three optional alignments that will be analyzed under CEQA, though only one alignment would be selected for implementation. As of the writing of this NOP, the preferred route is Route 3. The route details for each of the three possible alignments are provided below.

Route 1

Route 1 would travel along the former railroad ROW to the southern end of the Best Western Marina Gateway hotel where it would turn west to travel along the western side of Marina Way. This route would then turn east on West 23rd Street and north onto McKinley Avenue.

Route 2

Route 2 would travel along the existing alignment for Marina Way from West 32nd Street to the southern end of the Best Western Marina Gateway hotel where it would turn east into the hotel parking lot, turn north between the two buildings on the hotel property, cross Bay Marina Drive, and travel north along Cleveland Avenue to West 19th Street. The route would turn west at West 19th Street, then north on Tidelands Avenue.

[13] 42,247 vehicles per year – 31,873 vehicles per year = 10,374 vehicles per year

Route 3

Route 3 would travel between the former railroad ROW and existing Marina Way on the southern end, and along McKinley Avenue on the northern end. This route would travel on Bay Marina Drive, between Marina Way and McKinley Avenue, then turn north on McKinley Avenue. The southern portion of this route is consistent with the Bayshore Bikeway location identified in the PMP and the City's Harbor District Specific Area Plan.

City Program – Development Component

The City Program proposes amendments to the City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, and the Land Use (Zoning) Code for seven parcels north of Bay Marina Drive, all of which are discussed below under *City Program – Plan Amendments Component*. Six of the parcels (approximately 2.9 acres) are owned by the City and comprise two complete blocks between Bay Marina Drive to the south, West 23rd Street to the north, Harrison Avenue to the west, and Interstate 5 to the east. The remaining parcel (approximately 1.2 acres), owned by the City and leased to the San Diego Railway Association, is located at the northwest corner of Bay Marina Drive and Marina Way (formerly Harrison Avenue); the historic Santa Fe Rail Depot is located on this parcel, and no new development is proposed on this parcel.

The two City-owned, non-leased blocks are currently vacant. The City proposes to re-zone the parcels to Tourist Commercial (CT), which could allow these parcels to be developed with hotel, restaurant, retail, and/or some combination of tourist/visitor-serving commercial uses. The CT zone allows a floor area ratio (FAR) of up to 1.0, with no height limit; however, as part of the City Program – Plan Amendments Component, the City proposes to increase the FAR to 2.0 in the CT zone. The maximum allowable development with a FAR of 2.0 would be approximately 254,782 square feet of floor area. The proposed 2.0 FAR would allow for the development of desired land uses that require substantial floor areas such as hotels. The parking requirement would be based on the specific uses permitted in the CT zone.

For purposes of the analysis, an example of a potential development scenario associated with the City Program would be a hotel with up to five stories and 150 rooms, along with 15,500 square feet of restaurant space and 12,000 square feet of retail space.

The City Program would also include the potential closure, or narrowing, of Bay Marina Drive (west of Marina Way) to through vehicular traffic. All three scenarios are analyzed in this EIR, including keeping the road in its present condition with four lanes (two each way), reducing the four lanes to two lanes (one each way), and closing the road completely.

An alignment of the Bayshore Bikeway, consistent with Routes 1, 2, and 3, as described above, would traverse the City Program site, which would be located in the City and outside District jurisdiction. It would not be subject to the Public Trust. It would also be located within the California Coastal Zone and the City's LCP area. The City Program would require amendments to the City's General Plan, Land Use Code, Local Coastal Program, and Harbor District Specific Area Plan.

Port Master Plan Amendment Component

The project components that are under the District's existing planning jurisdiction are within the National City Bayfront, Planning District 5, of the PMP. This planning district is an established developed area with designated Marine-Related Industrial, Marine Terminal, Commercial Recreation, Marina, Park/Plaza, and Street land and water uses. "Marina District" is the term for the area located generally north and west of Pier 32 Marina. There are multiple actions related to the PMPA. The proposed PMPA, which would incorporate the Balanced Plan Component,

Pasha Road Closures Component, GB Capital Component, Pasha Rail Improvement Component, and a portion of the Bayshore Bikeway Component, would change the associated PMP maps, text, and tables to include the above land/water use changes associated with the project components. It would include the following more specific features:

- Change Tidelands Avenue between Bay Marina Drive and West 32nd Street, as well as West 28th Street between Quay Avenue and Tidelands Avenue, would be changed from Street to Marine-Related Industrial.
- Change the PMP maps and tables to reflect the revised land and water use designations associated with the Balanced Plan.
- Revise the Circulation/Navigation Element of the PMP to identify proposed Segment 5 of the Bayshore Bikeway within District jurisdiction.
- Modify and add public access corridor locations and widths for north–south and east–west public access corridors.

The GB Capital Project would result in a land use configuration that would vary slightly from that identified in the Balanced Plan; therefore, the PMPA would reflect the land uses associated with the Balanced Plan and be revised, where appropriate, to reflect the GB Capital Component.

City Program – Plan Amendments Component

Implementation of the City Program and most of the Bayshore Bikeway Component would require amendments to the City's General Plan, Local Coastal Program, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan (collectively, "City Planning Documents"). In addition, with the exception of the property owned by Caltrans, the area of the GB Capital Component that is east of the mean high tide line and not currently within the PMP would be amended in the City Planning Documents to reflect that this area would be added to the PMP through the project's PMPA.

In 2011, the City adopted a General Plan Update and a Land Use (zoning) Code Update, which created new land use designations and zoning classifications for the City's entire planning area. However, the new land use designations and zoning classifications do not apply to areas within the City's LCP, pending a LCPA to incorporate these changes. Consequently, land uses within the City's LCP (generally, areas west of Interstate 5) are regulated under the City's 1996 General Plan (as amended) and the previous Land Use Code that preceded the 2011 update. Prior to the 2011 updates, land uses, and zoning were identified in the 1996 Combined General Plan/Zoning Map, as amended.

The City Program would amend the City's General Plan Land Use Map and the Land Use Code Official Zoning Map to change the 1996 Combined General Plan/Zoning Map designations for five parcels that are designated Medium Manufacturing (MM) and two parcels that are designated Tourist Commercial (CT) to Specific Plan in the General Plan Land Use Map and Harbor District Specific Area Plan in the Land Use Code Official Zoning Map. The Harbor District Specific Area Plan would be amended to incorporate the seven parcels and to rezone five of the parcels from MM to CT. In addition, the FAR for the CT zone is proposed to be increased from 1.0 to 2.0. The proposed 2.0 FAR would allow for the development of desired land uses that require substantial floor areas such as hotels. The City's Bicycle Master Plan would also be amended to reflect the realignment of the Bayshore Bikeway. The LCP would be amended to reflect these changes to land use, zoning, and Specific Plan designations.

The City Planning Documents would also be amended to reflect the GB Capital Component of the project. For the portions of the GB Capital Component that are within District jurisdiction, the General Plan Land Use Map and the Land Use Code Official Zoning Map would be amended to

change the 1996 Combined General Plan/Zoning Map designation of CT to San Diego Unified Port District in the General Plan Land Use Map and Port Master Plan in the Land Use Code Official Zoning Map. The Harbor District Specific Area Plan would be amended to remove the District's jurisdictional areas of the GB Capital Component from the Specific Plan. The LCP would be amended to reflect these changes. In addition, all of the road closures would need to be removed from the Circulation Element Roadway Classifications of the City's General Plan.

The GB Capital Component extends onto a portion of the SDG&E utility corridor, east of the existing marina. This area is designated for CT uses in the City Planning Documents. The GB Capital Component improvements would be consistent with that use.

ENVIRONMENTAL CONSIDERATIONS

The attached *Initial Study/Environmental Checklist for the National City Bayfront Projects and Plan Amendments* addresses the potential environmental effects related to the proposed project and provides a discussion of which potential project-related and cumulative environmental effects would be included in the EIR. The EIR will include the following potential environmental effects of the proposed project: aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population/housing, public services, recreation, transportation and traffic, utilities/service systems, and other potential impacts identified during the NOP process. The EIR will also address feasible mitigation measures and a reasonable range of alternatives, as well as the additional mandatory sections required by CEQA. The District will also prepare a mitigation monitoring and reporting program to address the potential significant impacts of the proposed project.

COMMENTS

The NOP is available for a public review period that starts on **Thursday, December 20, 2018, and ends at 5:00 p.m. on Thursday, January 31, 2019**. Written comments will be accepted until 5:00 p.m. on Thursday, January 31, 2019. Comments regarding the scope and content of the environmental information that should be included in the EIR and other environmental concerns should be sent to:

San Diego Unified Port District
Attn: Anna Buzaitis
Planning Department
3165 Pacific Highway, San Diego, CA 92101

or emailed to abuzaiti@portofsandiego.org

PUBLIC SCOPING MEETING

A public scoping meeting to solicit comments on the scope and content of the EIR will be held on **Thursday, January 24, 2019, at 6:00 p.m. at the National City Aquatic Center, 3300 Goesno Place, National City, CA 91950.** District staff will be available to answer project questions at the scoping meeting. Comments at the scoping meeting will only be accepted in written form.

The District, as Lead Agency pursuant to CEQA, will review the written public comments received on the NOP and at the scoping meeting to assist in determining which issues should be addressed in the EIR.

Other opportunities for the public to comment on the environmental effects of the proposed project include, but are not limited to, the following:

- A minimum 45-day public review period for the Draft EIR
- A public hearing before the Board of Port Commissioners to consider certification of the EIR

For questions regarding this NOP, please contact Anna Buzaitis, Program Manager, Planning Department, at (619) 686-7263.

ATTACHMENTS

Figure 1: Project Vicinity Map
Figure 2: Project Components
Figure 3: Proposed Balanced Land Use Plan
Figure 4: Existing and Proposed Roadways within Balanced Plan Area
Figure 5: Park and Public Access Corridors
Figure 6: Proposed Relocation of Buoys
Figure 7: Phase I of GB Capital Component
Figure 8: Phase II of GB Capital Component
Figure 9: Illustrative of Proposed Hotel on Parcel B1
Figure 10: View of Realigned Marina Way with Dry Storage
Figure 11: Phase II Hotel Tower East-West Elevations
Figure 12: Phase II Hotel Tower North-South Elevations
Figure 13: Proposed Habitat Buffers
Figure 14: Proposed Rail Tracks
Figure 15: National City Marine Terminal Rail Route
Figure 16: Location of Lot J and Lot K
Figure 17: Interim and Potential Permanent Alignments of SANDAG Bayshore Bikeway in National City

Initial Study/Environmental Checklist for the National City Bayfront Projects and Plan Amendments EIR

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Figure 1
Project Vicinity Map
National City Bayfront Projects and Plan Amendments EIR

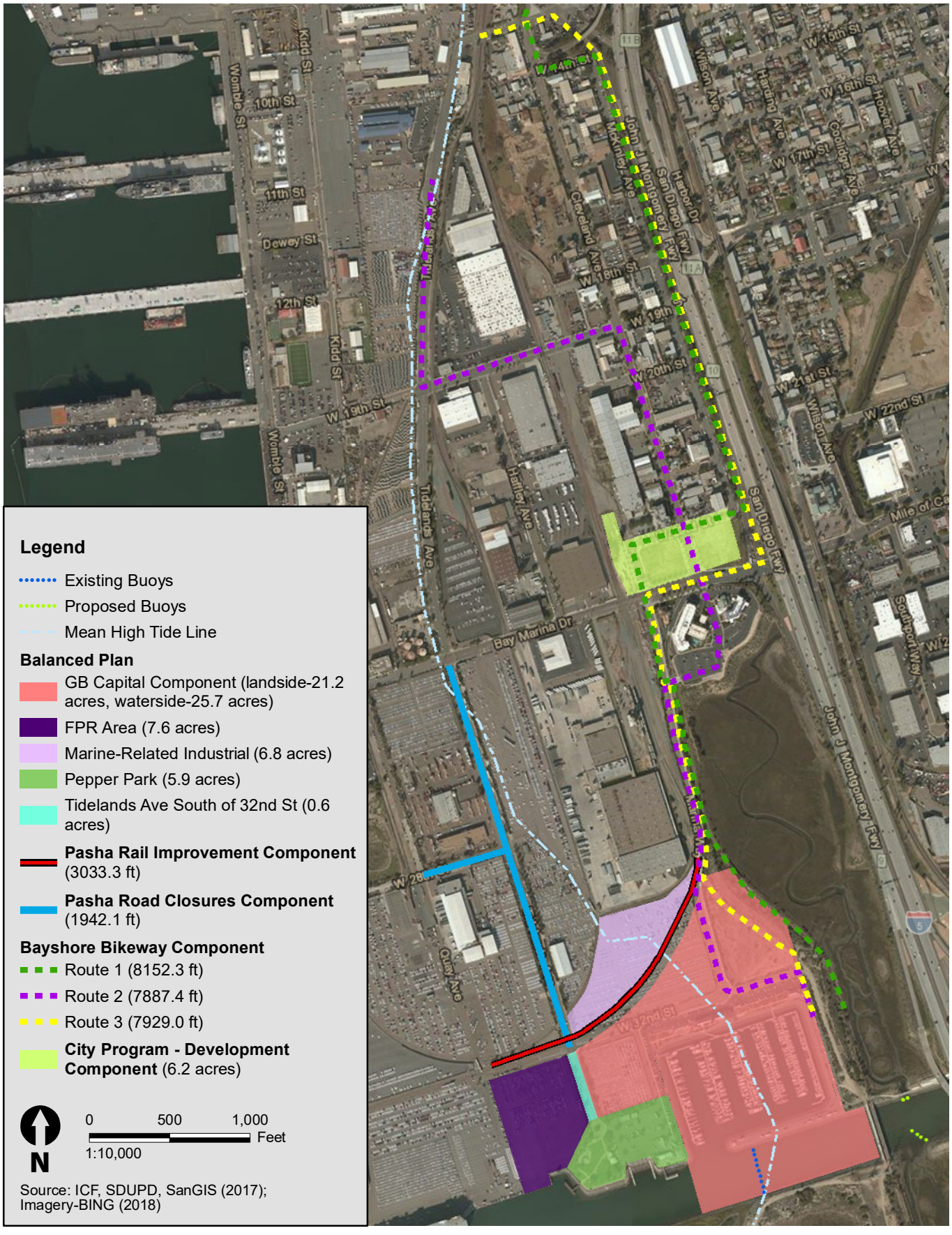

Figure 2
Project Components
National City Bayfront Projects and Plan Amendments EIR

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Figure 3
Proposed Balanced Land Use Plan
National City Bayfront Projects and Plan Amendments EIR

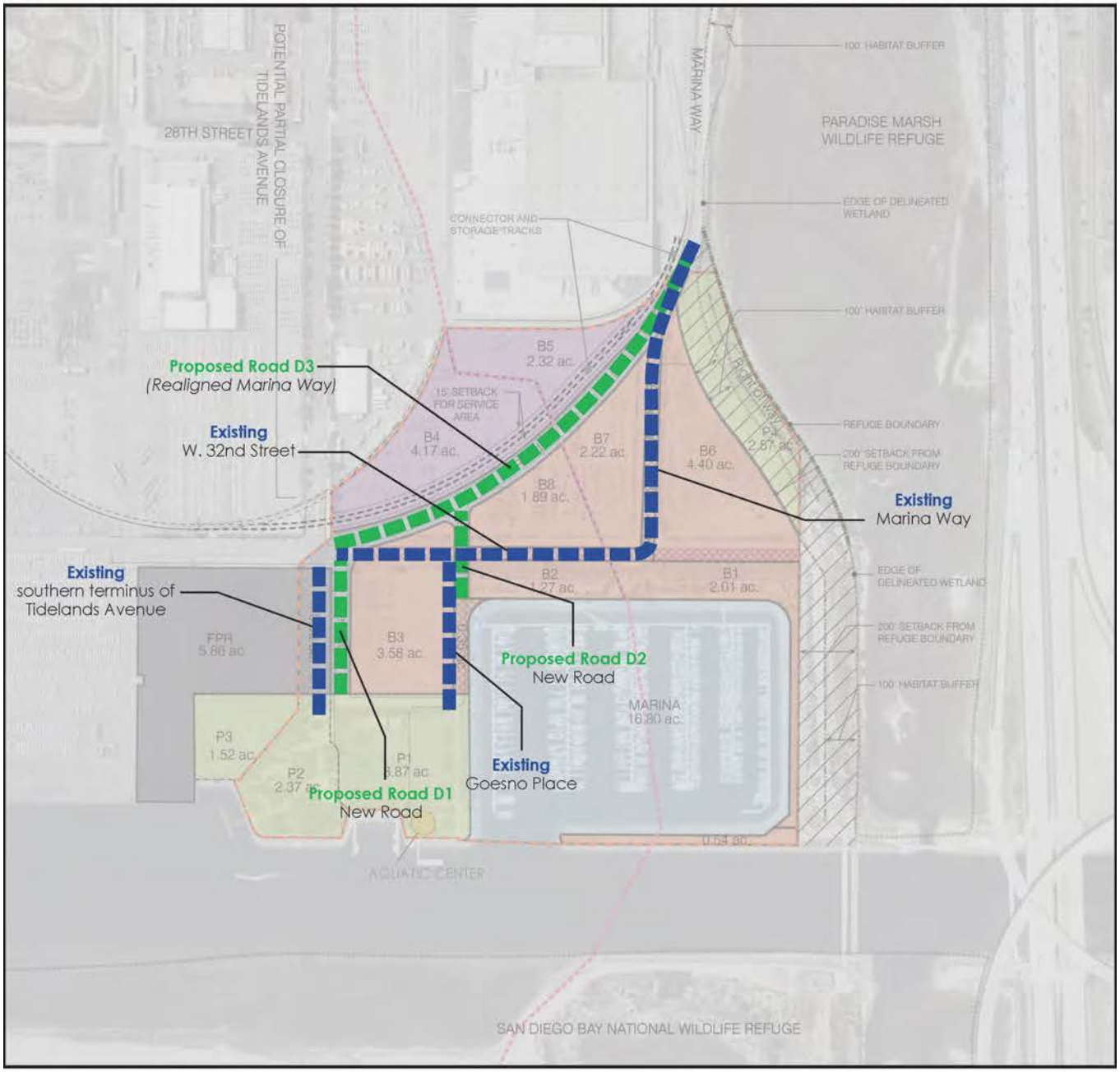

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Figure 4
Existing and Proposed Roadways Within Balanced Plan Area
National City Bayfront Projects and Plan Amendments EIR

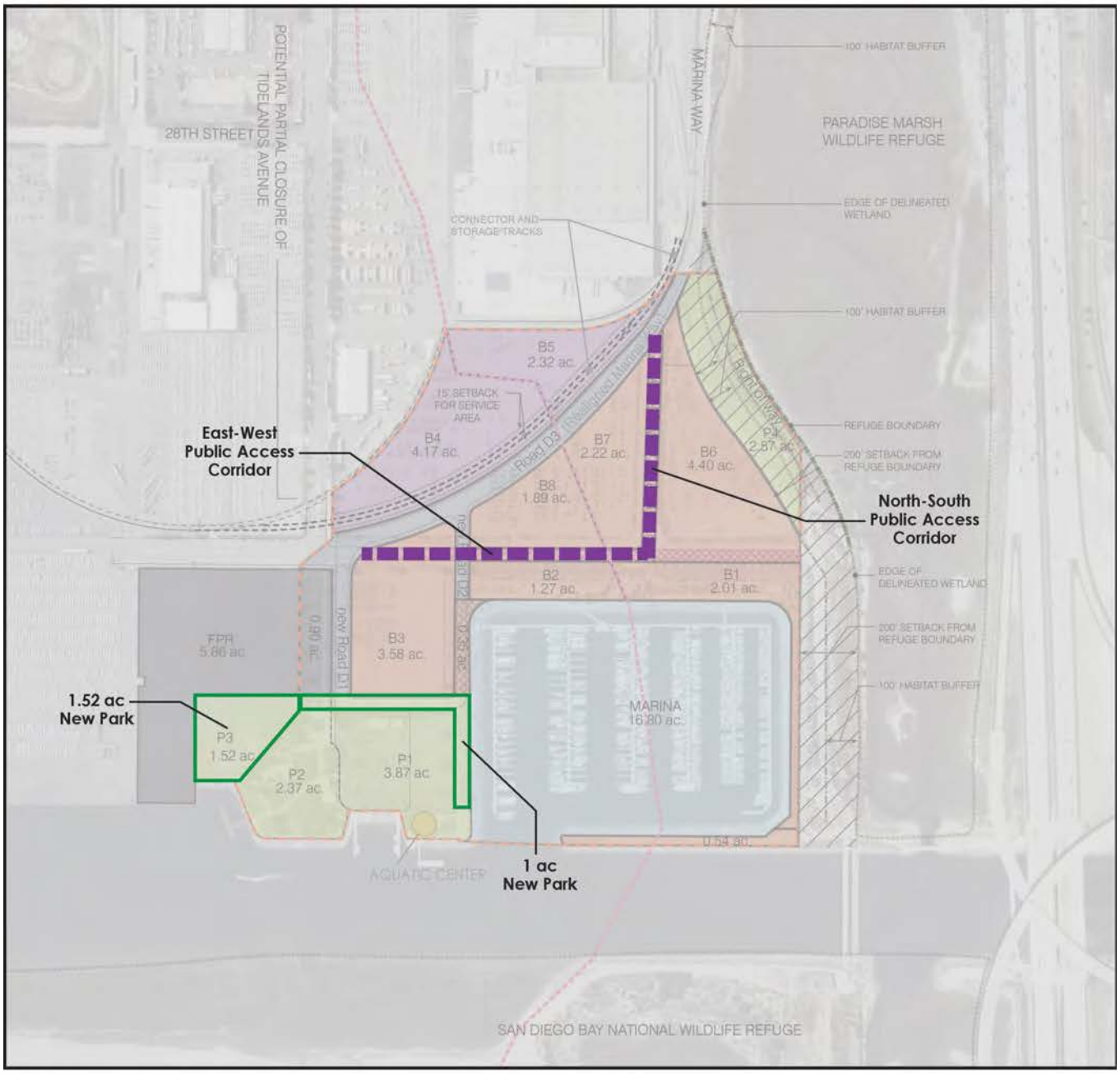

Figure 5
Park and Public Access Corridors
National City Bayfront Projects and Plan Amendments EIR

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Figure 6
Proposed Relocation of Buoys
National City Bayfront Projects and Plan Amendments EIR

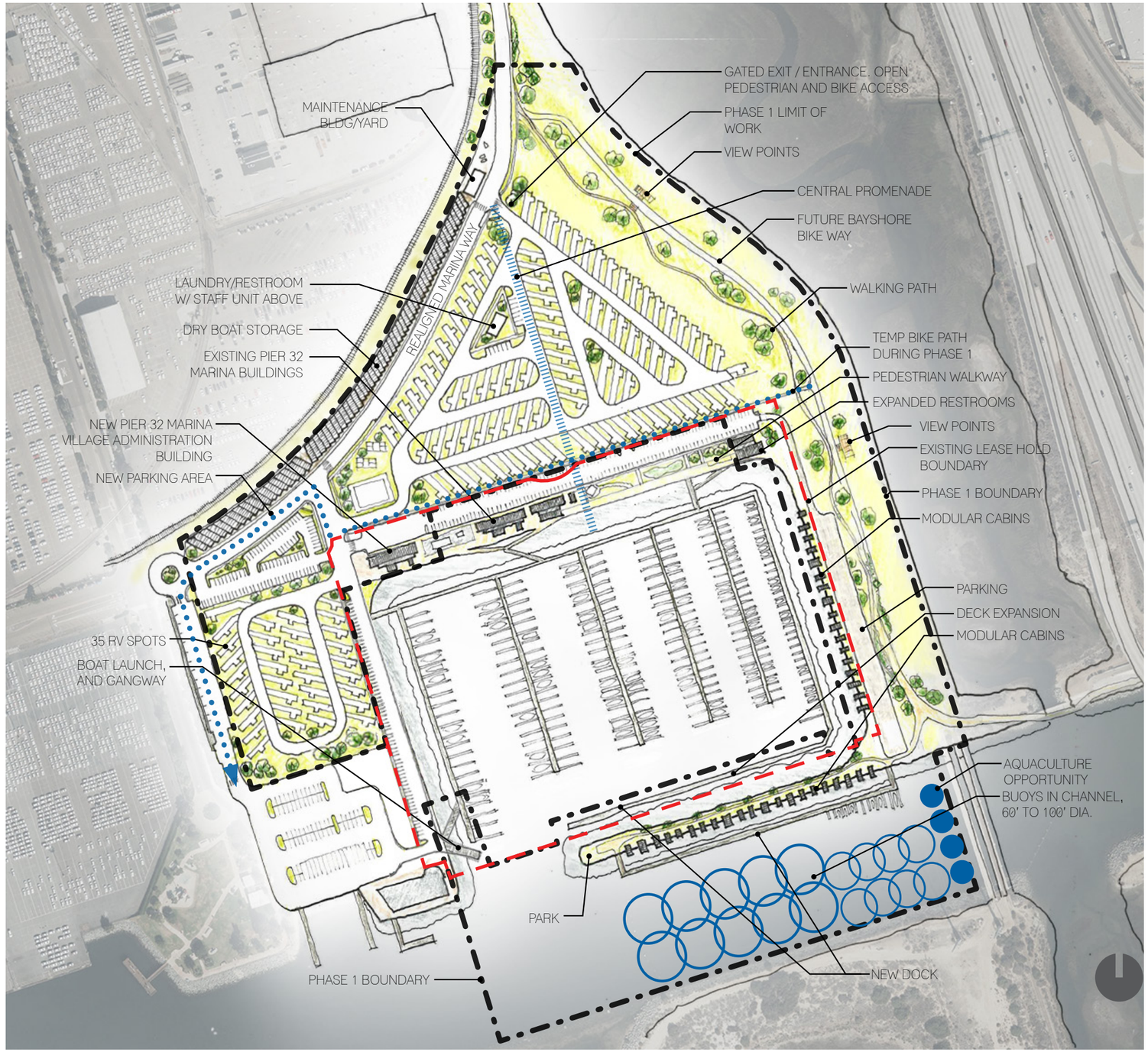

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Figure 7
Phase I of GB Capital Component
National City Bayfront Projects and Plan Amendments EIR

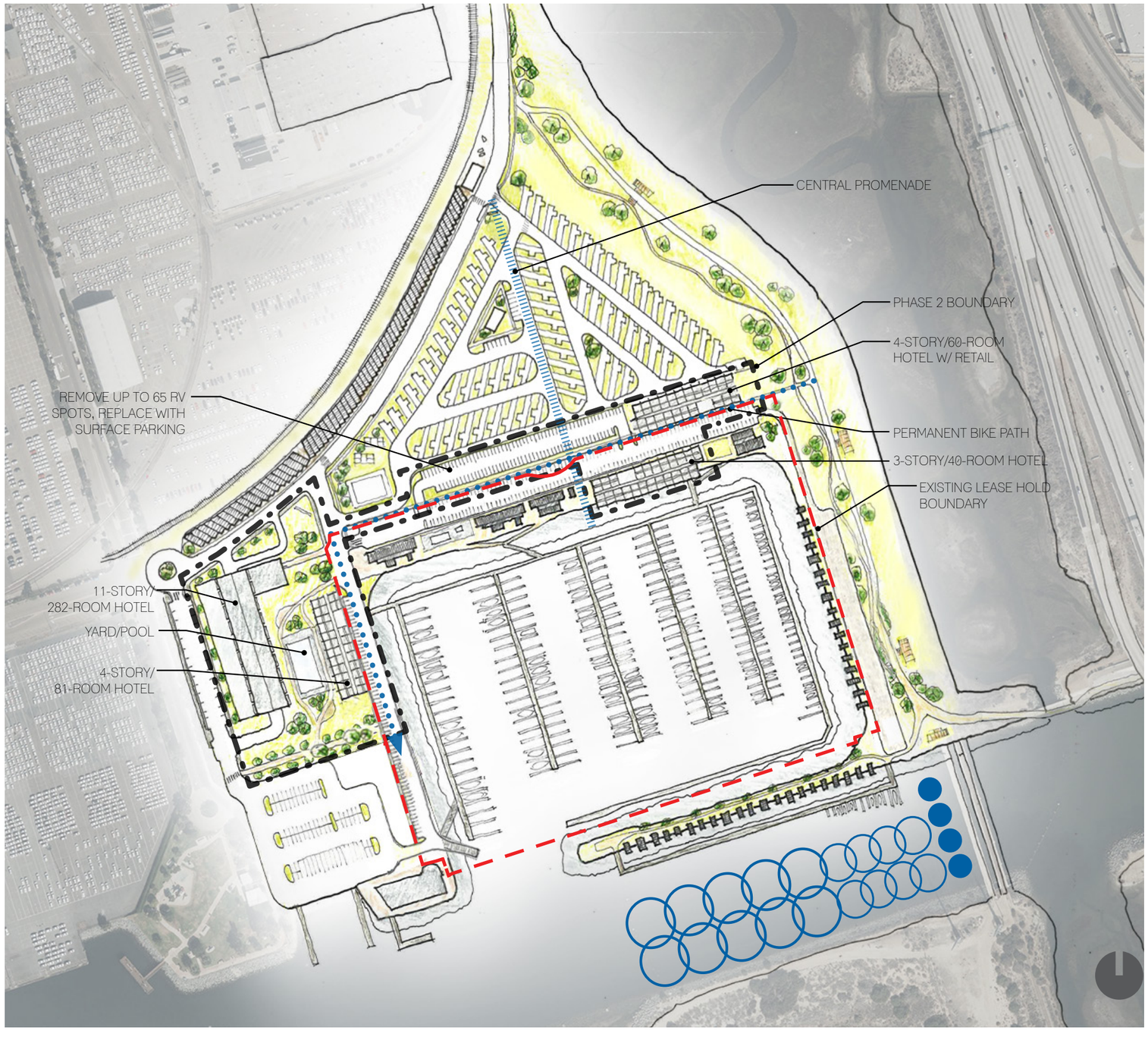

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Figure 8
Phase II of GB Capital Component
National City Bayfront Projects and Plan Amendments EIR

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Figure 9
Illustrative of Proposed Hotel on Parcel B1
National City Bayfront Projects and Plan Amendments EIR

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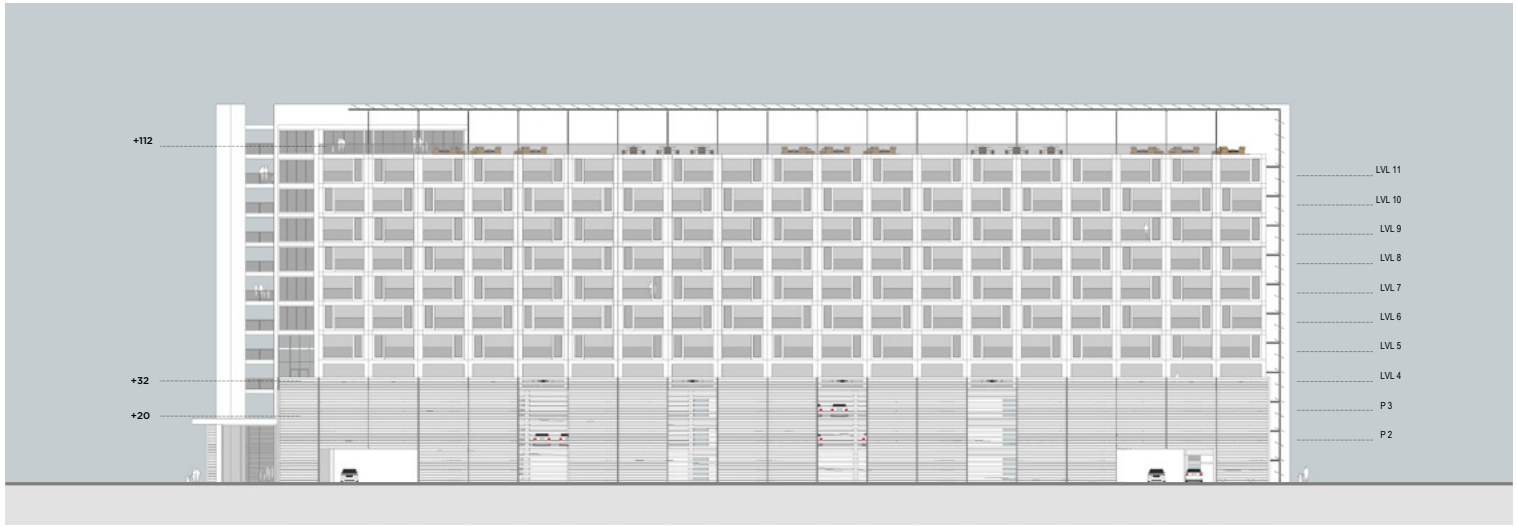
Figure 10
View of Realigned Marina Way with Dry Storage
National City Bayfront Projects and Plan Amendments EIR

EAST ELEVATION



WEST ELEVATION

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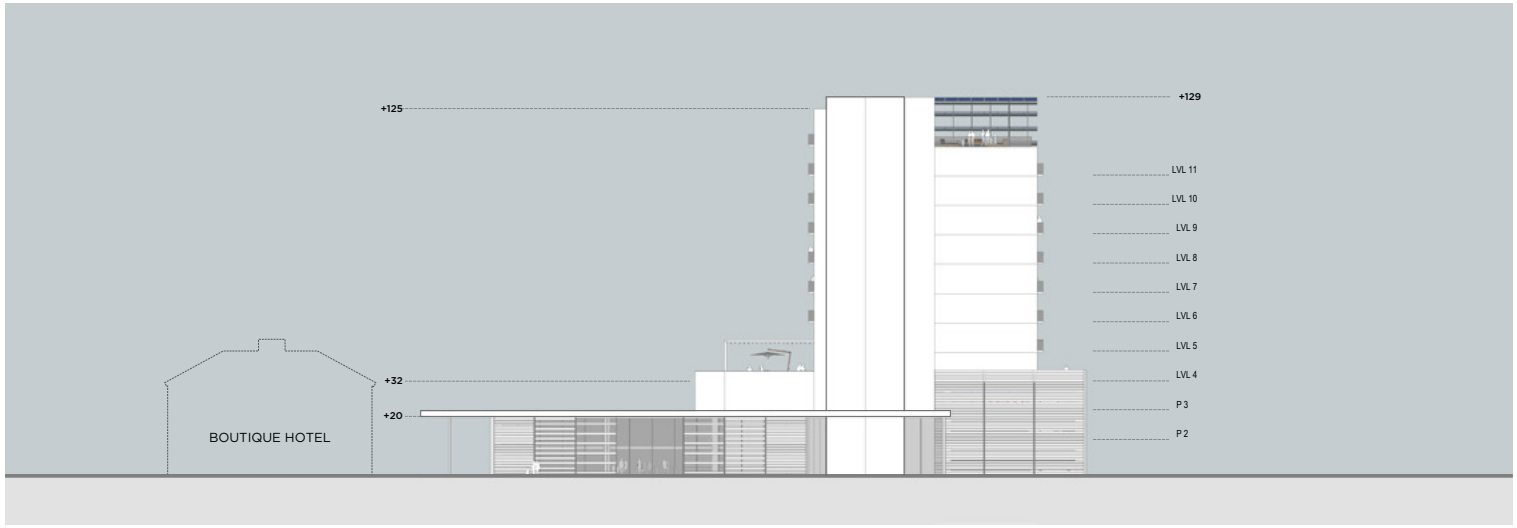
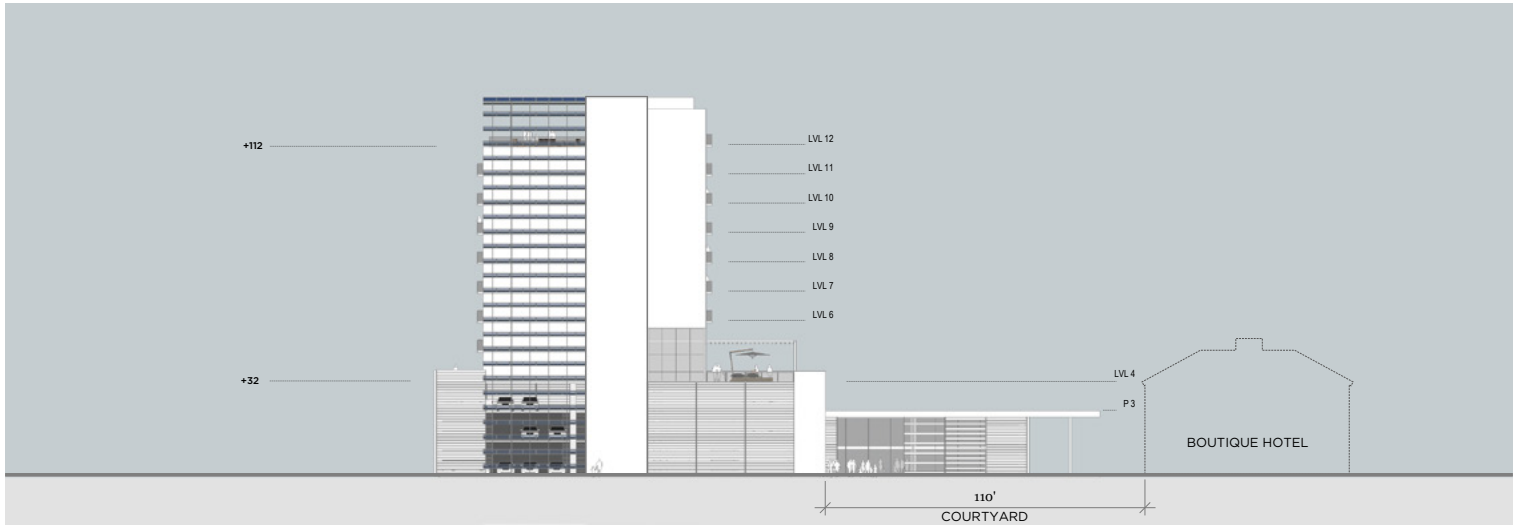
Figure 11
Phase II Hotel Tower East-West Elevations
National City Bayfront Projects and Plan Amendments EIR



NORTH ELEVATION



SOUTH ELEVATION

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Figure 12
Phase II Hotel Tower North-South Elevations
National City Bayfront Projects and Plan Amendments EIR

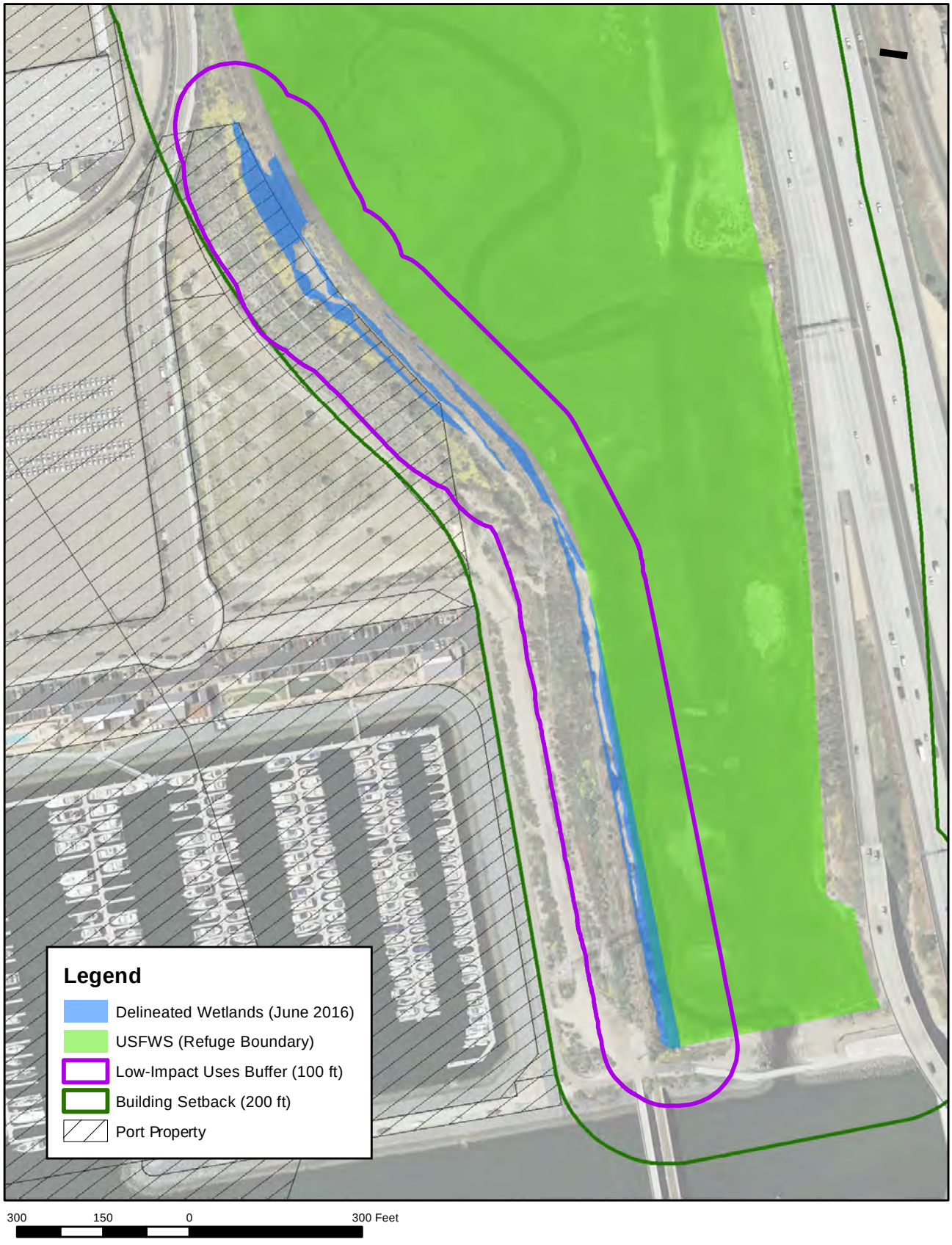

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Figure 13
Proposed Habitat Buffers
National City Bayfront Projects and Plan Amendments EIR

Figure 14
Proposed Rail Tracks
National City Bayfront Projects and Plan Amendments EIR

Existing Rail Route

Proposed Rail Route

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Figure 15
National City Marine Terminal Rail Route
National City Bayfront Projects and Plan Amendments EIR

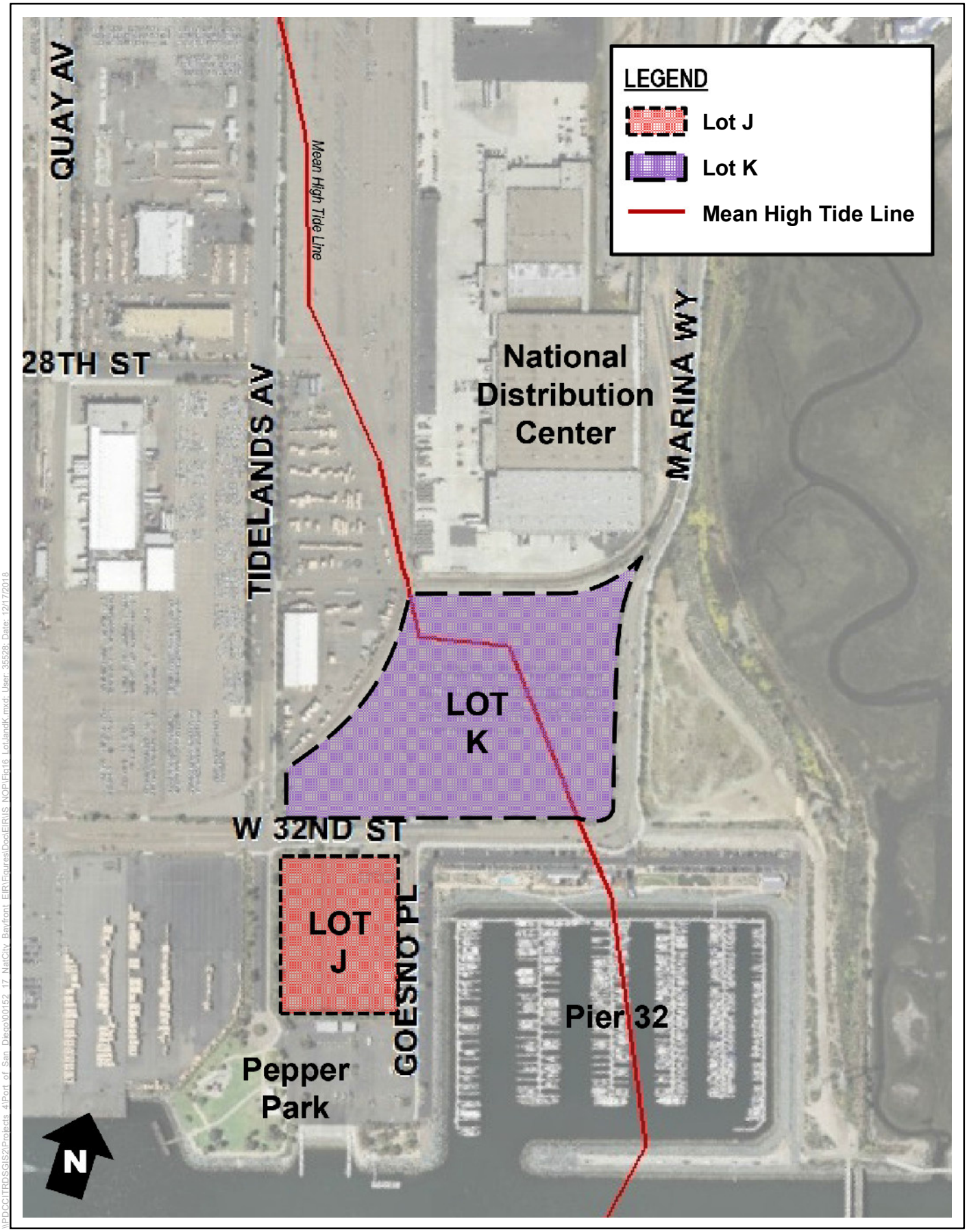

Figure 16
Location of Lot J and Lot K
National City Bayfront Projects and Plan Amendments EIR

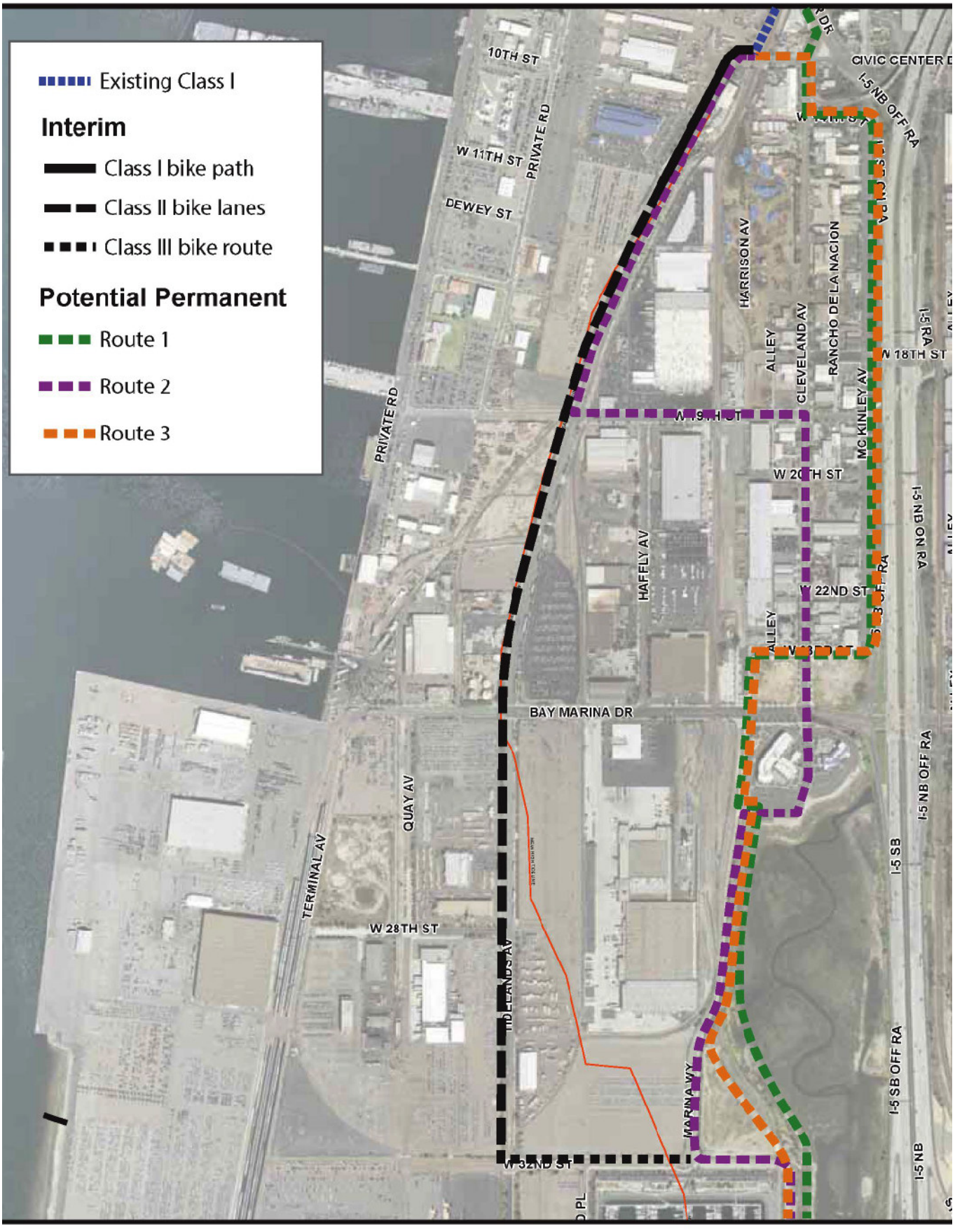

Figure 17
Interim and Potential Permanent Alignments of SANDAG BayShore Bikeway in National City
National City Bayfront Projects and Plan Amendments EIR

NATIONAL CITY BAYFRONT PROJECTS AND PLAN AMENDMENTS

INITIAL STUDY/ENVIRONMENTAL CHECKLIST CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

Prepared by:

ICF

December 2018

Contents

Acronyms and Abbreviations

AB	Assembly Bill
ARB	California Air Resources Board
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe
CAAQS	California Ambient Air Quality Standards
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
City Planning Documents	City's General Plan, Local Coastal Program, and Harbor District Specific Area Plan
CO	carbon monoxide
CRHR	California Register of Historical Resources
DOC	Department of Conservation
DOT	Department of Transportation
DPM	diesel particulate matter
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
INRMP	Integrated Natural Resource Management Plan
JRMP	District's Jurisdictional Runoff Management Program
MRZ	Mineral Resource Zone
NAAQS	National Ambient Air Quality Standards
NAS	Naval Air Station
NCMT	National City Marine Terminal
NOLF	Naval Outlying Landing Field
NRHP	National Register of Historical Places
PM10	particulate matter of 10 microns in diameter or smaller
PM2.5	particulate matter of 2.5 microns in diameter or smaller
PMP	Port Master Plan
PMP	Port Master Plan
RAQS	Regional Air Quality Strategy
RCRA	Resource Conservation and Recovery Act
Regional Plan	San Diego Forward: The Regional Plan
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SIP	State Implementation Plan
SR-	State Route
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant

TIA	Transportation Impact Analysis
USDA	United States Department of Agriculture
USGS	United Sates Geological Survey
VOC	volatile organic compound

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Initial Study/Environmental Checklist

1.	Project Title:	National City Bayfront Projects and Plan Amendments
2.	Lead Agency Name and Address:	San Diego Unified Port District (District) 3165 Pacific Highway San Diego, CA 92101
3.	Contact Person and Phone Number:	Anna Buzaitis, Planning Department (619) 686-7263
4.	Project Location:	National City, generally north of Sweetwater Channel, south of Civic Center Drive, east of the National City Marine Terminal, and west of Paradise Marsh (National Wildlife Refuge) and Interstate 5 See Figure 1.
5.	Project Applicant/Proponent Name and Address:	San Diego Unified Port District 3165 Pacific Highway San Diego, CA 92101 City of National City 1243 National City Boulevard National City, CA 91950-430 Pasha Automotive Services 1309 Bay Marina Drive National City, CA 91950 GB Capital Holdings, LLC 3201 Marina Way National City, CA 91950
6.	Land Use Designation(s):	Various in Port Master Plan: Marine Terminal, Marine-Related Industrial, Park/Plaza, Commercial Recreation, Street, Recreational Boat Berthing; Various in City Planning Documents: Tourist Commercial, Medium Manufacturing, Open Space, and Open Space Reserve
7.	Zoning:	See Port Master Plan Designation for Port Property; City: Open Space, Open Space Reserve, Tourist Commercial, Medium Manufacturing
8.	Description of Project:	See Project Description in Notice of Preparation

9.	Surrounding Land Uses and Setting:	<u>Marina District and Balanced Land Use Plan:</u> North: Industrial uses East: San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit (Paradise Marsh) South: San Diego Bay National Wildlife Refuge and Sweetwater Channel West: National City Marine Terminal and San Diego Bay <u>Tidelands Avenue Closure Project:</u> North: Bay Marina Drive East: Industrial uses South: W 32nd Street West: Industrial uses <u>GB Capital Project:</u> North: Industrial uses East: San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit (Paradise Marsh) South: Sweetwater Channel West: Industrial and recreational uses <u>City Program:</u> North: Industrial East: Interstate 5 South: Bay Marina Drive West: National City Depot <u>Bayshore Bikeway Component:</u> North: Industrial and commercial uses East: Interstate 5 and San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit (Paradise Marsh) South: Commercial and recreational uses and San Diego Bay West: Industrial and recreational uses
10.	Other Public Agencies Whose Approval Is Required:	California Coastal Commission approval of PMPA and City Harbor District Specific Area Plan; City of National City approval of City General Plan Amendments, Land Use Code, Local Coastal Program, and Harbor District Specific Area Plan; California Department of Transportation (Caltrans) approval of utilization of Caltrans property east of the marina, and approval of construction and utilization of Bayshore Bikeway on Caltrans property near Civic Center Drive/Harbor Drive intersection; Metropolitan Transit System (MTS) approval of construction and utilization of (inactive rail) MTS right-of-way south of Bay Marina Drive for Bayshore Bikeway; and potential approval from SANDAG for the Bayshore Bikeway Component.

Environmental Factors Potentially Affected

The environmental factors checked below would potentially be affected by this project (i.e., the project would involve at least one impact that is a "Potentially Significant Impact"), as indicated by the checklist on the following pages.

- ☒ Aesthetics
- ☐ Agriculture and Forest Resources
- ☒ Air Quality
- ☒ Biological Resources
- ☒ Cultural Resources
- ☐ Geology/Soils
- ☒ Greenhouse Gas Emissions
- ☒ Hazards and Hazardous Materials
- ☒ Hydrology/Water Quality
- ☒ Land Use/Planning
- ☐ Mineral Resources
- ☒ Noise
- ☒ Population/Housing
- ☒ Public Services
- ☒ Recreation
- ☒ Transportation/Traffic
- ☐ Tribal Cultural Resources
- ☒ Utilities/Service Systems
- ☒ Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated" but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards and (2) has been addressed by mitigation measures based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the project, nothing further is required.

Anna Buzaitis 12/20/2018

Signature Date

Anna Buzaitis, Program Manager San Diego Unified Port District

Printed Name For

Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained if it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies when the incorporation of mitigation measures has reduced an effect from a "Potentially Significant Impact" to a "Less-than-Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less-than-significant level.
5. Earlier analyses may be used if, pursuant to tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
    a. Earlier Analysis Used. Identify and state where earlier analyses are available for review.
    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, when appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to a less-than-significant level.

I. Aesthetics	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a scenic highway?	☐	☐	☒	☐
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☒	☐	☐	☐

a. Have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. The Port Master Plan (PMP) provides a framework for the consideration of vista areas that have been recognized as scenic and visually important to the area and the region. The project is in Planning District 5 (National City Bayfront) of the PMP. There is only one scenic vista area identified in Planning District 5, in the western portion of Pepper Park, facing southwest across the Sweetwater Channel and toward the San Diego Bay National Wildlife Refuge. In addition, although not identified in the Port Master Plan, an existing 20-foot-wide view corridor/clear zone is required to be maintained, pursuant to the Pier 32 Marina Coastal Development Permit (District CDP-2006-02), at the existing terminus of Marina Way, looking south through the site towards the Pier 32 Overlook and marina. The north-south public access corridors identified in the Balanced Plan Component and GB Capital Component are proposed to be located along the existing alignment of Marina Way and centered on the existing view corridor at Pier 32 Marina. In addition, the existing alignment of Marina Way is identified as the Harrison Avenue Public Access Corridor in the City's Harbor District Specific Area Plan, and per that plan is a "designated public visual protection area"; therefore, this will be further analyzed in the EIR.

Closure of Tidelands Avenue between Bay Marina Drive and West 32nd Street, and West 28th Street between Tidelands Avenue and Quay Avenue, as well as closure of the southern half of the existing Goesno Place south of West 32nd Street would have no effect on views of the Bay from these locations because views are obstructed by maritime operations, including the cargo storage and related structures, fencing, and landscaping, the latter of which is particularly notable when looking south toward Pepper Park from Tidelands Avenue. As such, closing portions of Tidelands Avenue, West 28th Street, and Goesno Place would not have a substantial impact on a scenic vista. The proposed project would expand Pepper Park by approximately 2.54 acres. The existing scenic vista area is anticipated to be enhanced because a larger park area would be created that would have the same views of the San Diego Bay National Wildlife Refuge and Sweetwater Channel. Because this scenic vista is not oriented toward the project sites, the changes associated with the proposed project would not alter the views from this vista area. Therefore, the proposed project would have no impact on the existing designated scenic vista in Planning District 5.

Other project components would also not have a significant impact on other general (i.e., non-designated) public views. Specifically, the Pasha Road Closures Component of the project, which would close Tidelands Avenue between Bay Marina Drive and West 32nd Street, and West 28th Street between Tidelands Avenue and Quay Avenue, would have no effect on views of the Bay from these locations because views are obstructed by maritime operations, including cargo storage and related structures, fencing, and landscaping. As such, the Pasha Road Closures Component of the project would not result in a substantial impact on a scenic vista.

Aside from the single designated scenic vista in Planning District 5, the next closest designated scenic vista to the project sites is within Planning District 7 (Chula Vista Bayfront), approximately 1.3 miles south of the project sites, looking north towards the project area. Planning District 8 (Silver Strand South) contains a scenic vista approximately 2 miles southwest of the project sites, looking east, with a panoramic view of the Bay, including Chula Vista Bayfront, National City Bayfront, and downtown San Diego. This vista would provide a view of the project sites to the northeast. However, in each case the long-distance views to the proposed project sites would not be significantly affected because, at this distance, the project sites make up only a small part of the overall viewshed and would not cause these views to be blocked or otherwise impair important scenic attractions such as the Bay and adjacent waterfront areas. Therefore, impacts on scenic vistas in nearby Planning Districts 7 and 8 would be less than significant.

Designated scenic vistas on the Coronado Bayfront (Planning District 6) are located approximately 4 miles from the project area and face southeast, toward the project area. It is possible that development associated with the proposed project would be visible from designated scenic vista areas in Planning District 6; however, because the viewshed consists of the Bay as well as a cityscape with many skyscrapers, hotels, and industrial structures, and because the proposed project sites are distant views, implementation of the proposed project would not block these designated views or otherwise alter the existing views such that the views would be degraded. As such, the proposed project's impact on designated scenic vistas in Planning District 6 would be less than significant.

Finally, construction of the proposed project would result in temporary visible construction-related activity within and adjacent to Pepper Park associated with the use of standard construction equipment such as earth-moving equipment, concrete trucks, and forklifts. The direct open-water views of the Sweetwater Channel and the Bay from Pepper Park would be unaffected, regardless of construction activities because construction activities would primarily occur behind (away from) the location of the designated scenic vista. Consequently, construction of the proposed project would not result in a significant impact on a designated scenic vista.

b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings along a scenic highway?

Less-than-Significant Impact. The project sites are located in an area that is urban and developed with recreational, commercial, and industrial land uses. There are no scenic rock outcroppings on the project sites. There are trees in Pepper Park and on the perimeter of the City Component portion of the site, but none are designated as scenic resources. Moreover, the proposed project would expand Pepper Park and add trees within the expansion area and within other project areas.

Although no historic buildings are presently within the project sites, the proposed project would potentially relocate the City-owned Granger Hall, a designated historical building, to Pepper Park as part of the Balanced Plan Component.

Views of the project sites would not be available from any of the six designated scenic highways in San Diego County (DOT 2018). The nearest designated scenic highway to the project sites is State Route (SR-) 75, which travels in a north/south direction from Coronado to Imperial Beach. SR-75 is more than 3 miles west of the project sites, across San Diego Bay. At this distance, some brief views of the National City Bayfront may be available on a clear day; however, no clear views of the project sites are available from SR-75. The existing Granger Hall site is approximately 2 miles east of the National City Bayfront and is not visible from SR-75. Other designated scenic highways, such as portions of SR-52, SR-78, SR-94, SR-125, and SR-163, are several miles from the project sites and do not have views of the sites. Impacts to scenic resources along a scenic highway would not occur. Therefore, the proposed project would have a less-than-significant impact on scenic resources. Further discussion in the EIR is not warranted.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact. The existing conditions on the project sites include Pepper Park and the National City Aquatic Center, paved parking lots for Pasha related activities, the Pier 32 Marina structures, and disturbed vacant lots. Parcels adjacent to the project sites are developed with a Best Western Hotel, large warehouses including National City Distribution Center (adjacent to Marina Way), the Burlington Northern Santa Fe (BNSF) National City Rail Yard (southwest of Bay Marina Drive/Marina Way), and an Amazon distribution center (adjacent to Bay Marina Drive). Implementation of components such as the Pasha Road Closures and Pasha Rail Improvement would be similar to the industrial character that currently exists, including the cargo storage areas and existing rail lines. The Bayshore Bikeway would maintain the visual character of the area and would blend in with existing conditions because it would mostly require changes in road striping and configuration, with small-scale signage. The Balanced Plan and City Program would reconfigure and redesignate properties in the Marina District and on seven City-owned parcels to allow commercial recreational development, which would change the visual character of the current cargo storage areas and vacant lots to multi-story commercial-recreation buildings (e.g., hotels, retail, and restaurant). The GB Capital Component of the proposed project would introduce new visual elements, such as an RV park, modular cabins, concealed dry boat storage, and up to four hotels, one of which would be up to 11 stories tall. Given that some project components (e.g., the GB Capital Component) would introduce several new visual elements to the National City Marina District, the extent to which the project would degrade the existing visual character or quality of the project site and its surroundings will be evaluated in the EIR. Therefore, this issue area will be discussed further in the EIR.

d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Potentially Significant Impact. Implementation of the proposed project would potentially create new sources of light and glare, from street, building, or safety lighting. New sources of glare could result if the proposed structures are constructed with highly reflective building material. Additionally, excessive light and impacts to adjacent land uses could result if new lighting is not down shielded. The surrounding land uses contain several sources of light and glare, such as street lighting along the existing roadways in, and adjacent to, the project sites, and building lights associated with the Best Western hotel and adjacent warehouses. In addition, the existing Pasha facility is used as vehicle storage, so parked vehicles are a source of daytime glare in the area (the vehicles' sheet metal and glass reflect the sunlight). Although the proposed project is not anticipated to represent a new source of light and glare that would adversely affect daytime or nighttime views

in the area, especially when considered in context with the surrounding conditions, this issue area will be further discussed in the EIR.

II. Agriculture and Forest Resources	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
In determining whether impacts on 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 Department 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, the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
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?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	☐	☐	☐	☒
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))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

No Impact. The project sites are not used as active agricultural land, nor are they planned or zoned for agricultural uses. According to the Farmland Mapping and Monitoring Program of the California Department of Conservation, the project sites and surrounding area are classified as Urban and

Built-Up Land (DOC 2018), which does not contain any agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, project approval would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur, and further discussion in the EIR is not warranted.

b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?

No Impact. As described above in II.a, the proposed project sites and surrounding area are not zoned for agricultural uses. According to the California Department of Conservation's (DOC's) San Diego County Williamson Act Lands Map, the project sites and surrounding area are designated as "Urban and Built-Up Land," and no Williamson Act lands occur on the site or surrounding area (DOC 2013). Therefore, the proposed project would not conflict with existing zoning for agricultural use or conflict with a Williamson Act contract. No impact would occur, and further discussion in the EIR is not warranted.

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))?

No Impact. As described above under II.a and II.b, the project sites are within District tidelands and are not used or zoned for agricultural use. The project sites do not contain forest lands, as defined in Public Resources Code Section 12220(g), or timberland, as defined by Public Resources Code Section 4526, and are not zoned for forest land or timberland or Timberland Production, as defined by Government Code Section 51104(g). Project approval would not conflict with existing zoning for, or cause rezoning of, forest land or timberland resources; therefore, no impact would occur, and further discussion in the EIR is not warranted.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed above under II.c, the project sites do not contain any forest lands as defined in Public Resources Code Section 12220(g); consequently, the project would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of forest resources. Therefore, no impact would occur, and further discussion in the EIR is not warranted.

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?

No Impact. Implementation of the proposed project would have no impact on agriculture or forestry resources. The project sites are classified as Urban and Built-Up Land, which does not contain any agricultural uses or areas designated for Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Furthermore, there are no Williamson Act contracts or forest lands in the project vicinity (DOC 2013). The project would not result in conversion of important farmland or other agricultural resources to a non-agricultural use because the project sites and the surrounding area are developed land that is used for industrial purposes or is currently disturbed and vacant. Therefore, the proposed project would not involve changes to the existing environment that, because of its location or nature, would result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Further discussion in the EIR is not warranted.

III. Air Quality	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
When available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐

a. Conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The San Diego Air Pollution Control District (SDAPCD) is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria pollutants for which the County is in nonattainment (i.e., ozone, particulate matter of 10 microns in diameter or smaller [PM10], and particulate matter of 2.5 microns in diameter or smaller [PM2.5]). The most recent SDAPCD air quality attainment plans are the 2016 Regional Air Quality Strategy (RAQS), 2002 and 2012 ozone maintenance plans, and the 2016 ozone attainment plan. The RAQS outlines SDAPCD's plans and control measures designed to attain the state air quality standards for ozone, while the 2002 and 2012 maintenance plans and 2016 attainment plan include the SDAPCD's plans and control measures for attaining the National Ambient Air Quality Standards (NAAQS) for ozone. The 2016 RAQS projects future emissions and determines the strategies necessary for the reduction of stationary-source emissions through regulatory controls. The federal Clean Air Act also mandates that the state submit and implement a State Implementation Plan (SIP) for local areas not meeting those standards. California Air Resources Board (ARB) mobile source emission projections and San Diego Association of Governments (SANDAG) growth projections are based on population and vehicle trends and land use plans developed by local agencies. As such, projects that propose development that is consistent with the growth anticipated by the relevant land use plans that were used in the formulation of the RAQS and SIP would be consistent with the RAQS and SIP. The PMP is the governing land use document for physical development under the jurisdiction of the District; and the City's General Plan, Local Coastal Program, and Harbor District Specific Area Plan (collectively, City Planning Documents) are the governing land use documents for physical development within the City. Therefore, projects that propose development consistent with growth

anticipated by the current PMP and the City Planning Documents are considered consistent with the RAQS and SIP. Moreover, for a project that proposes development that is less dense than anticipated within a general plan (or other governing land use document such as the PMP), that project would likewise be consistent with the RAQS and SIP because emissions would be less than estimated for the existing PMP. If a project proposes development that is greater than that anticipated in the PMP, City Planning Documents and SANDAG's growth projections, the project would not yet be reflected in the RAQS and SIP, and might have a potentially significant impact on air quality because emissions would exceed those estimated for the existing PMP and City Planning Documents. This situation would warrant further analysis to determine if a project would exceed the growth projections used in the RAQS for a specific subregional area. Further evaluation of the project's consistency with the RAQS and SIP will be analyzed in the EIR.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Potentially Significant Impact. As mentioned above, the SDAPCD is required to reduce emissions of pollutants for which the County is in nonattainment (i.e., ozone, PM10, and PM2.5). Emissions related to the proposed project would be attributable to both the construction phase and its operational phase.

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment, construction worker vehicle trips, truck haul and material delivery trips, off-gassing from paving activities, and fugitive dust from demolition and grading activities. Mobile-source criteria pollutant emissions would result from the use of construction equipment and vehicles, and paving operations would result in emissions of volatile organic compounds (VOCs) associated with off-gassing.

Operation of the proposed project has the potential to introduce new uses and change terminal activity, which may create air quality impacts primarily associated with RV park and hotel uses, marina/park uses, vessel activity, car carrier truck trips, rail activity, worker commutes, car on- and off-loading, and minor increases in area sources associated with periodic painting of paved surfaces. As such, the project has the potential to significantly contribute to the violation of an air quality standard or significantly contribute to an existing or projected air quality violation, and this issue will be analyzed in the EIR.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact. The San Diego Air Basin (SDAB) is currently in nonattainment for ozone under the NAAQS and for PM10 and PM2.5 under California Ambient Air Quality Standards (CAAQS), which is a result of past and present projects and could be further impeded by the proposed project. Operation of the proposed project has the potential to introduce new uses (e.g., hotels, RV park) and change terminal activity, which may create air quality impacts.

Due to a potential increase in operations associated with the project, the project has the potential to result in a cumulatively considerable net increase of a criteria pollutant for which the SDAB is in nonattainment. Therefore, this issue will be analyzed in the EIR.

d. Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. ARB defines sensitive receptors as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may experience greater harm from poor air quality than other members of the population. ARB has identified the following people as the most likely to be affected by air pollution: children younger than 14, the elderly older than 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as "sensitive receptors" (ARB 2005). Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder-care facilities, schools, and parks.

Diesel particulate matter (DPM), which is classified as a carcinogenic toxic air contaminant (TAC) by ARB, is the primary pollutant of concern with regard to health risks to sensitive receptors. Diesel-powered construction equipment and diesel-powered heavy-duty trucks emit DPM.

Construction activities associated with each project component would include diesel equipment activity near existing and proposed new sensitive land uses. Generally, construction activities at a marine terminal are far enough away to not affect nearby uses. However, as activities will be near existing and proposed new uses potentially for an extended time, construction-related TAC emissions will be analyzed in the EIR.

As noted in III.b above, operation of the various project components would change the emissions profile by introducing new emission sources and by changing terminal activity, which may create air quality impacts primarily associated with RV park and hotel uses, marina/park uses, vessel activity, car carrier truck trips, rail activity, worker commutes, car on- and off-loading, and other ancillary uses. Terminal activity is near Pepper Park, while truck and rail that carry cargo to and from the terminal travel through and near residential neighborhoods. Any changes in this activity (e.g., closure of Bay Marina Drive to through-traffic) could expose nearby sensitive receptors to pollutants. Moreover, changes that would affect the layout of the terminal, such as the connector track, and changes that would introduce new land uses and emission sources to the area, such as the GB Capital Component and City Program Component, could potentially conflict with nearby uses that could expose sensitive land uses to new sources of emissions. In addition, the various proposed project components would result in new vehicle traffic, and potentially new traffic patterns (e.g., closure of Bay Marina Drive to through-traffic) that would have the potential to create carbon monoxide (CO) hotspots at nearby roadways and intersections. In addition, the effect of CO levels that would be produced as a result of traffic generated from the proposed project on ambient CO levels will be discussed in the EIR using the traffic data provided by the Transportation Impact Analysis.

The project would potentially expose sensitive receptors to substantial pollutant concentrations, including TACs and carbon monoxide. Construction and operation of the proposed project would result in criteria pollutant and TAC emissions in different quantities than existing conditions. Therefore, this issue will be analyzed in the EIR.

e. Create objectionable odors affecting a substantial number of people?

Potentially Significant Impact. According to ARB's *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, and manufacturing operations (CARB 2005). Odor impacts on residential areas and other

sensitive receptors, such as hospitals, daycare centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas. Potential odor emitters during construction activities include diesel exhaust, asphalt paving, and the use of any architectural coatings to paint paved surfaces. Potential odor emitters during operations would include diesel exhaust from truck and train activity as well as the use of any architectural coatings to periodically paint paved surfaces. However, the sources of odor impacts would be limited to the marina uses, circulation routes, parking areas, and areas immediately adjacent to terminal operations. This issue will be analyzed in the EIR.

IV. Biological Resources	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☒	☐	☐	☐
f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☒	☐	☐	☐

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. The majority of the project sites are located within disturbed land that has previously been graded. Parcel B6, which is part of the Balanced Plan and the GB Capital Component, is located adjacent to the San Diego Bay National Wildlife Refuge and therefore a wildlife survey was conducted to identify special-status species that are known. Two special-status plant species were detected within the survey area: estuary seablite (*Suaeda esteroa*) and beach goldenaster (*Heterotheca sessiliflora* ssp. *Sessiliflora*). Three special-status wildlife species

were detected within the survey area: osprey (*Pandion haliaetus*), wandering skipper (*Panoquina errans*), and Belding's savannah sparrow (*Passerculus sandwichensis beldingi*). Construction, demolition, and operational activities associated with the proposed project could result in a significant impact on the special-status plant and wildlife species.

Disturbed habitat covers much of the survey area as the area has been previously graded and is therefore heavily disturbed. The area is dominated by the invasive plant, stinknet (*Oncosiphon piluliferum*), with emergent broom baccharis (*Baccharis sarothroides*), which is native. However, these species occur in disturbed areas on the site and are not part of a native, functioning habitat; thus, the area is not considered to be sensitive habitat. Moreover, little-to-no vegetation is present on the City-owned parcels as they appear to have been graded. However, additional investigation into the existing conditions of Parcel B6, the seven City Parcels, and part of the proposed alignment of the Bayshore Bikeway and surrounding areas will be conducted, and the results of the analysis will be included in the EIR.

In-water activities would occur as part of the GB Capital Component. These activities could result in noise or vibration impacts during the construction phase, and additional overwater shading may occur as well. A marine biological resource assessment will be completed on the GB Capital Component of the project to determine if there will be in-water marine biological impacts on eelgrass, sensitive species, and Essential Fish Habitat; that assessment will be included in the EIR. Moreover, any potential changes to small recreation vessel access (associated with the GB Capital Component and the potential change in use restrictions and allowable uses at the National City Aquatic Center) to the areas around the San Diego Bay Wildlife Refuge would be analyzed to determine if a potentially significant impact would occur.

The proposed project includes a connector rail track as part of the Pasha Rail Improvement Component. This component would increase efficiency for Pasha's operations at the National City Marine Terminal (NCMT) by reducing maneuvering and train build times. It would not, however, increase throughput because throughput is a function of land availability, vehicle dwell time, and accessibility to empty railcars. In terms of land availability, the connector track would not increase available land, but under the Balanced Plan there would be a net loss of land available for Pasha. Regarding vehicle dwell time, the connector track would not necessarily decrease dwell time because dwell time is largely dependent on the vehicle manufacturer and the dealer (i.e., when the dealer is able to take possession of the vehicle). In terms of accessibility to empty rail cars, the connector track could theoretically increase the accessibility of empty railcars by providing a more direct link to the BNSF National City Yard; however, the availability of the empty railcars would still be dependent on whether BNSF has empty railcars and provides them to Pasha. Still, changes in train operations (not necessarily just additional trains) or location could result in an impact in the area near a Wildlife Refuge. Therefore, this issue will be further analyzed in the EIR.

Because development of vacant parcels, in-water work, the Bayshore Bikeway, and changes in train operations may result in impacts on sensitive species, a more detailed analysis will be provided in the EIR.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Potentially Significant Impact. Riparian habitat is composed of vegetation and physical features normally found on stream banks and flood plains and is directly associated with streams, lakes, or other bodies of water.

The proposed project includes construction on Parcel B6, which is currently undeveloped, and also construction and operation of the Bayshore Bikeway in the area east and north of Parcel B6. These areas of the proposed project are adjacent to the San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit. The biological survey conducted on this parcel and the area south of the existing hotel (Dudek 2017) identified Diegan coastal sage scrub, which is a special-status plant community, as well as southern coastal salt marsh and saltpan/mudflats. The EIR would include further evaluation of the potential impacts on sensitive-species plants and wildlife throughout the project sites, including Parcel B6.

The GB Capital Component of the proposed project may result in marine impacts related to the proposed in-water work. A Marine Biological Resource assessment will be conducted to evaluate the proposed project's effect on any riparian habitat or other sensitive natural community (including eelgrass) identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. A full analysis will be provided in the EIR to determine if a significant impact would occur.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. The San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit, located along the eastern boundary of the proposed project sites, is classified as wetlands as defined by Section 404 of the Clean Water Act. Proposed project components, including the potential alignments of the Bayshore Bikeway and the undeveloped Parcel B6 of the GB Capital Component site, may result in potential edge effects on the San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit. The proposed project could potentially have a substantial adverse effect on federally protected wetlands. Therefore, this issue will be discussed further in the EIR.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less-than-Significant Impact. The project sites consist primarily of developed land and are not wildlife corridors or native wildlife nursery sites. The proposed project would not interfere with movement of wildlife and would not affect wildlife corridors. The building height(s) of the hotel(s) have the potential to impact migratory birds and the Pacific Flyway, but given that the project is being proposed in a heavily developed area, migrating birds would navigate around the structure(s) as they do around other buildings in the downtown. In addition, it would not be within the boundaries of a native wildlife nursery and would not otherwise interfere with the use of native wildlife nursery sites. Therefore, impacts would be less than significant, and further discussion in the EIR is not warranted.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Potentially Significant Impact. The applicable local land use plans, policies, ordinances, or regulations of the District, adopted for the purpose of protecting biological resources, are the Port

Master Plan, San Diego Unified Port District Code, and the District's Integrated National Resources Management Plan (INRMP). The District and the U.S. Navy Southwest Division maintain and implement the INRMP. Additionally, the District has established goals to protect, preserve, and enhance natural resources in San Diego Bay in Section II of the PMP, *Planning Goals* (Goal XI). The project sites are not located in areas identified for conservation purposes by the District. (Conservation areas are located in Planning Districts 7, 8, and 9.) However, the project sites are located next to the San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit, as previously mentioned, and may result in conflicts with goals or policies intended to protect resources within this refuge area. In addition, the City Program (Development and Plan Amendments Components) site would be subject to the National City General Plan, Land Use Code, Local Coastal Program, and Harbor District Specific Area Plan policies and implementation guidelines regarding Conservation and Open Space intended to protect biological resources in the City. Consequently, this issue will be further discussed in the EIR.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

Potentially Significant Impact. As previously mentioned, the District and the U.S. Navy Southwest Division maintain the INRMP, which catalogues the plant and animal species around the Bay and identifies habitat types to ensure the long-term health, recovery, and protection of San Diego Bay's ecosystem in concert with economic, Naval, recreational, navigational, and fisheries needs. Development of the proposed project will be reviewed with the goals and intent of the INRMP and a more detailed analysis will be provided in the EIR. The San Diego Bay National Wildlife Refuge, Sweetwater March Unit, is managed by the U.S. Fish and Wildlife Service and management of the refuge is guided by the Comprehensive Conservation Plan (CCP). The CCP provides the following guiding principles for the Sweetwater Marsh Unit:

> Goal 1: Protect, manage, enhance, and restore coastal wetland and upland habitats to benefit native fish, wildlife, and plant species within the Sweetwater Marsh Unit.
>
> Goal 2: Support recovery and protection efforts for the federally and state listed threatened and endangered species and species of concern that occur within the Sweetwater Marsh Unit.
>
> Goal 3: Protect and restore the environmental health of the Refuge's coastal salt marsh and upland habitats by making contaminants remediation a priority for Refuge lands, adjacent properties, and upstream developments.
>
> Goal 4: Provide outstanding environmental education programs for all ages in partnership with the Chula Vista Nature Center and other public agencies and non-governmental organizations.
>
> Goal 5: Provide quality wildlife-dependent recreation, interpretation, and outreach opportunities to enhance public appreciation, understanding, and enjoyment of the Refuge's biological and cultural resources.

The Bayshore Bikeway component of the proposed project would be subject to the goals established for the Sweetwater Marsh in the CCP. The Balanced Plan Component of the proposed project would help reach Goal 5 through the expanded use of the aquatic center element of the project.

The City Program ((Development and Plan Amendments Components) site would be subject to the National City General Plan, Land Use Code, Local Coastal Program, and Harbor District Specific Area Plan policies and implementation guidelines regarding Conservation and Open Space intended to

protect biological resources in the City. Based on the location and type of project that could be constructed on the City Program site, the proposed project could result in a conflict with adopted habitat conservation plans, and this issue will be discussed further in the EIR.

V. Cultural Resources	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	☒	☐	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☒	☐	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

Potentially Significant Impact. The proposed project involves the potential relocation of Granger Hall to Pepper Park. Granger Hall is listed in the National Register of Historical Places (NRHP). A resource listed in the NRHP is automatically listed in the California Register of Historical Resources (CRHR). As such, Granger Hall qualifies as a historical resource per State CEQA Guidelines Section 15064.5. The existing NRHP registration form prepared for Granger Hall specifies "areas of significance" that can generally be translated into the more recent NRHP Listing Criteria. It appears that Criterion C would likely apply to Granger Hall, while Criteria A and B would not. A technical memorandum will be prepared to update the existing documentation and document the current condition of the building. The technical memorandum will include an integrity analysis and assessment of the building's character-defining features, and will specify the current applicable Listing Criteria codified by the National Park Service since the building was listed in the mid-1970s.

Two other significant historical resources are located within the project area. One is the National City Santa Fe Depot, which is listed in the NRHP under Criteria A and C. As a property listed in the NRHP, the National City Santa Fe Depot qualifies as a historical resource per State CEQA Guidelines Section 15064.5. Additionally, a segment of the Coronado Belt Line (CA-SDI-13073) is located within a portion of the proposed project's Bayshore Bikeway component, along the west side of the San Diego National Wildlife Refuge, Sweetwater Marsh Unit. A segment of this resource located outside of National City has been listed on a local register of historical resources. The segment of the Coronado Belt Line located within the project area will be evaluated as part of the cultural resources technical study to determine if it qualifies as a historical resource under CEQA, and addressed in the EIR.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Potentially Significant Impact. State CEQA Guidelines Section 15064.5 defines an archaeological resource as any artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that the resource:

- Contains information, with demonstrable public interest in that information, needed to answer important scientific research questions; or
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A record search was conducted by the South Coastal Information Center (SCIC) on April 24, 2017, for the District's Port Master Plan Update, which is currently underway. The area encompassed by that record search includes the current project boundary and an approximately quarter-mile buffer. The SCIC maintains the California Historical Resource Information System database for San Diego County and keeps a record of all reported cultural resource studies and findings within San Diego County. The record search revealed that no previously recorded resources are located within the proposed project area; however, two cultural resources (CA-SDI-7454 and CA-SDI-13073) are located adjacent to and within the project area. CA-SDI-7454, mapped as intersecting with Bayshore Bikeway alignments Route 1, 2, and 3, was recorded as a shell midden in 1979; an update in 2002 failed to relocate the site. CA-SDI-13073 consists of the Coronado Belt Line Railroad. As noted above, a segment of this resource is located within a portion of the proposed project's Bayshore Bikeway component, and will be addressed in the EIR.

In addition to the record search, a review of historic maps and aerials was conducted. ICF archaeologists collected historic shoreline data of the project area by obtaining digitized and georeferenced historical U.S. Coast and Geodetic Survey maps (Alden 1857). For Parcel B6, the historic shoreline data indicated that the area west of Marina Way consisted of San Diego Bay waters prior to 1857. A review of a 1904 San Diego United Sates Geological Survey (USGS) topographic map indicated that the area east of Marina Way consisted of what is now the San Diego Bay National Wildlife Refuge, Sweetwater Marsh Unit. Historic aerials (NETR 2017 – photographs from 1953, 1964, 1966, 1980) show extensive changes to Parcel B6 in the form of import of fill and redirection and channelization of Sweetwater Channel. For this reason, there does not appear to be any possibility that archaeological deposits exist anywhere near the surface of Parcel B6 today.

According to historic maps (USGS 1904), the seven parcels within the City Program were historically located above the high tide mark and show urban development in the early 20th century. The parcels are currently vacant and given the age of development in this area, potential for historic cultural resources cannot be ruled out.

Project-related activities involving ground disturbance could cause a substantial adverse change in the significance of an archaeological or historic resource. Further discussion will be provided in the EIR.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. The San Diego Natural History Museum conducted a paleontological record search on May 1, 2017, for the District's Port Master Plan Update, which encompasses Parcel B6. The search revealed that Parcel B6 consists of artificial fill and Holocene marine deposits. The museum assigned a paleontological resource sensitivity rank to each geologic unit following City of San Diego and County of San Diego Guidelines (City of San Diego 2007, County of San Diego 2009). Artificial fill is assigned no (zero) paleontological sensitivity because artificial fill

has been previously disturbed and may have been imported to the site, and any contained fossils have lost their contextual data and are thus of little scientific value. Holocene marine deposits are generally less than 10,000 years old and are assigned a low paleontological sensitivity based on their young geologic age and lack of known fossil localities.

The seven City Program parcels were not included in the Port Master Plan Update's paleontological record search; therefore, a paleontological records search from the San Diego Natural History Museum will be obtained for the proposed project. Preliminary research indicates that the seven City Program parcels are underlain by Old Paralic Deposits, which is assigned a high paleontological sensitivity rating for the diverse and well-preserved fossils of marine invertebrates and marine vertebrates that have been recovered from these deposits.

Construction activity, including ground excavation, associated with the proposed project could potentially destroy a unique paleontological resource or site or unique geologic feature. Further discussion will be provided in the EIR.

d. Disturb any human remains, including those interred outside of formal cemeteries?

Less-than-Significant Impact. The proposed project is not a formal cemetery and is not near a formal cemetery. The proposed project and surrounding area are either fully developed or in active waters, and there is no record of human remains being identified during development of the area. The site is not known to be on a burial ground. For these reasons, the potential for human remains to be present at the project site is extremely low. However, if human remains are discovered, State Health and Safety Code Section 7050.5 requires that further disturbance and activities will cease in any area suspected to overlie remains and that the County Coroner be contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the Native American Heritage Commission, who will then notify the Most Likely Descendant. Further provisions of PRC Section 5097.98 are to be followed as applicable. Therefore, through compliance with the existing regulations, the construction and operation of the proposed project would not disturb any human remains, including those interred outside of formal cemeteries. Therefore, impacts would be less than significant, and further discussion in the EIR is not warranted.

VI. Geology and Soils	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
2. Strong seismic ground shaking?	☐	☐	☒	☐
3. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

1. 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? Refer to Division of Mines and Geology Special Publication 42.

Less-than-Significant Impact. The proposed project would not expose people or structures to potential substantial adverse effects from the rupture of a known earthquake fault, because no active faults are identified within the project sites. According to the California Geological Survey

(California Department of Conservation 2010). Because there are no faults within the project sites, and ground disturbance activities associated with the proposed project are not likely to influence the potential for fault rupturing, construction and operation of the proposed project would not exacerbate the existing fault conditions. The project would not exacerbate the potential of a fault rupture, and further discussion in the EIR is not warranted.

2. Strong seismic ground shaking?

Less-than-Significant Impact. The project sites are in an area that is susceptible to seismic ground shaking. The closest fault line to the project sites, the Rose Canyon fault zone, is approximately 0.45 mile west, in the San Diego Bay (California Department of Conservation 2010). That fault line, Elsinore fault, is approximately 40 miles to the northeast. Additionally, the project sites are in Seismic Zone 4, which is a designation used to denote the areas with the highest risk to earthquake ground motion (California Seismic Safety Commission 2005).

The project sites are in a medium-low Probabilistic Peak Ground Acceleration Area, which correlates to how hard the earth shakes in a given area (City of National City 2011). The project sites are underlain by Soft Soil types, categorized by the National Earthquake Hazards Reduction Program as soils that may amplify the ground shaking effects of earthquakes. Consequently, a seismic event within the Rose Canyon fault zone could cause significant ground shaking on the project site; however, design and construction of the proposed project would comply with all seismic-safety development requirements, including Title 24 standards of the current California Building Code. More importantly for purposes of CEQA, the proposed project would not include any characteristics that might exacerbate the potential for strong seismic ground shaking. As such, less-than-significant impacts from the project related to its potential to exacerbate strong seismic groundshaking in the area would occur. Further discussion in the EIR is not warranted.

3. Seismic-related ground failure, including liquefaction?

Less-than-Significant Impact. According to the U.S. Department of Agriculture (USDA) Web Soil Survey; the project sites are underlain by three types of soils: Huerhuero-Urban land complex, Made land, and Tidal flats. Tidal flats are hydric soils, which are soils that are saturated or have wetland characteristics, and can increase the potential of liquefaction. The Tidal flats are primarily associated with the Sweetwater Marsh Unit and only occur on the eastern border of the project sites directly adjacent to the marsh, where the Bayshore Bikeway project component is proposed (USDA 2018). The project sites are mostly underlain by either Made land (fill) or Huerhuero-Urban land complex, which have a low liquefaction risk. Moreover, design and construction of the proposed project would comply with all seismic-safety development requirements, including Title 24 standards of the current California Building Code. Because the project would be engineered to eliminate the low liquefaction hazard, and because the project would not have the potential to exacerbate the potential for liquefaction to occur, less-than-significant impacts associated with liquefaction or other seismic-related ground failure would occur, and further discussion in the EIR is not warranted.

4. Landslides?

No Impact. Implementation of the proposed project would not expose people or structures to a substantial adverse effect from landslides. Landslide risk is determined by steep slopes that have 25% or greater incline, soil type, and soil-slip susceptibility, as defined by the USGS. The northeastern portion of Parcel B6 (of the Balanced Plan) slopes towards the San Diego Bay National

Wildlife Refuge, and Sweetwater Marsh Unit; however, the sloped area is part of the 200-foot setback from the refuge boundary, so no buildings would be located there. Route 3 of the Bayshore Bikeway Component is proposed to be located in this sloped area; however, it would be sited in locations that do not exceed a 25% slope. Therefore, the proposed project would not exacerbate the potential of a landslide occurring, and impacts would not be significant. Further discussion in the EIR is not warranted.

b. Result in substantial soil erosion or the loss of topsoil?

Less-than-Significant Impact. Implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil. Erosion is a condition that could adversely affect development on any site. Construction activities could exacerbate erosion conditions by exposing soil and adding water to the soil, either from irrigation or runoff from new impervious surfaces. The General Construction Permit, which was adopted by the State Water Resources Control Board as Water Quality Order 2009-0009-DWQ as amended by 2010-0014-DWQ, and Order 2012-006-DWQ, is required for soil disturbance activities that would be greater than 1 acre. It is anticipated that all components of the proposed project would involve construction activities with soil disturbance over 1 acre, and therefore each would be subject to the General Construction Permit. As such, each project component with soil disturbance over 1 acre is required to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will include Best Management Practices (BMPs), such as sediment and erosion control measures, to prevent pollutants from leaving the sites that would be employed during construction. Furthermore, the project components would need to comply with the City's grading ordinance.

In addition, consistent with the District's Jurisdictional Runoff Management Program (JRMP) (pursuant to State Water Resources Control Board Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and R9-2015-0100 [NPDES Permit #CAS0109266, Municipal Permit]), the components of the proposed project that are located within District jurisdiction would be designed with BMPs consistent with the District's *BMP Design Manual*, which requires the use of low-impact development BMPs, as well as source control and treatment control BMPs (District 2016). Future development associated with the City Program (Development and Plan Amendments Components) would be designed with BMPs consistent with the City's JRMP and the City's *BMP Design Manual*, which requires the use of low-impact development BMPs, as well as source control and treatment control BMPs (City 2018). Therefore, both construction and operational impacts related to soil erosion or loss of topsoil would be less than significant. Further discussion in the EIR is not warranted.

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 an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-Than-Significant Impact. Bay deposits that underlie the project sites could be unstable because of their liquefaction potential. As discussed under VI.a.4, the project sites do not contain slopes exceeding a 25% grade, and they would not be susceptible to on- or offsite landslides. The project sites are mostly underlain by either Made land (fill) or Huerhuero-Urban land complex, which have a low liquefaction risk. Moreover, design and construction of the proposed project would comply with all seismic-safety development requirements, including Title 24 standards of the current California Building Code, and the National City Municipal Code, Section 15.70 (grading ordinance) (City of National City 2018). Because the project would be engineered to eliminate the

low liquefaction hazard and because the project would not have the potential to exacerbate the potential for liquefaction to occur, no impact associated with liquefaction or other seismic-related ground failure would occur. Due to these onsite conditions and compliance with the applicable regulations, impacts would be less than significant because the proposed project would not exacerbate existing unstable conditions. Further discussion is not warranted in the EIR.

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?

Less-Than-Significant Impact. Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content as well as a significant decrease in volume with a decrease in water content. Changes in the water content of highly expansive soils can result in severe distress for structures constructed on or against the soils. Underlying soils found on site are partially composed of clays and, as such, could be subject to expansion. Huerhuero-Urban land complex (2 to 9% slope) has a high shrink-swell behavior, Made land has variable shrink-swell behavior, and Tidal flats have a high shrink-swell behavior (USDA 1973). Should any soil failure occur, risks to life or property associated with the proposed project may increase due to the construction of new structures, which would increase the number of people within the project sites. Construction of the proposed project would be subject to applicable ordinances of the current California Building Code (California Code of Regulations Title 24), and expansive soils would be removed and replaced with engineered soil. Further discussion is not warranted in the EIR.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?

No Impact. No septic tanks or alternative wastewater disposal systems are proposed; therefore, no impact would occur. Further discussion in the EIR is not warranted.

VII. Greenhouse Gas Emissions		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐
b.	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. Construction and operation of the proposed project would result in greenhouse gas (GHG) emissions in greater quantities than existing conditions. Construction of the project's various components, including but not limited to, demolition of structures and roadways, installation of the connector track, changes to Pepper Park, and construction of new buildings or structures, would generate GHG emissions. Once constructed, the proposed project would change vehicle traffic patterns and quantities in the project area due to the expanded park, park/plaza, commercial recreational, and maritime uses, all of which would generate GHG emissions.

Emissions sources such as vessels, trucks, passenger vans, and electricity and water use that may increase with the proposed project will be analyzed in the EIR. This potential increase in GHG emissions could potentially, either directly or indirectly, have a significant impact on the environment by exceeding established thresholds for GHG emissions. In addition, the EIR will consider the physical effects of climate change on the proposed project; this includes conducting a sea level rise analysis. The sea level rise analysis will be conducted using best available science, which as of publication of this NOP is the Ocean Protection Council's State of California Sea Level Rise Guidance: 2018 Update (OPC 2018 Update). More specifically, for sea level rise analyses, the District currently uses the following short-, medium-, and long-term sea level rise projections/scenarios (both with and without storm events) from the OPC 2018 Update: high emissions (RFP 8.5) for the 1-in-20 change or 5% probability for years 2030 (0.7 feet sea level rise), 2050 (1.4 feet sea level rise), and 2100 (4.5 feet sea level rise), and also the median or 50% probability for year 2100 (2.6 feet sea level rise). The analysis will identify any areas of potential impacts due to potential future increases in mean sea level rise (temporary coastal flooding, and permanent inundation) and if the project exacerbates potential impacts on the environment resulting from sea level rise or associated events (e.g., coastal flooding, wave overtopping, erosion, etc.).

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. The District has enacted a variety of policies and plans to reduce GHG emissions as part of its Climate Action Plan, including the implementation of shore power, equipment and truck replacement/retrofits, vessel speed reductions, and the Clean Truck Program.

In addition, the City adopted a Climate Action Plan in 2011. The project would increase GHG emissions and may therefore conflict with or impede implementation of plans, policies, or regulations that were adopted to reduce GHG emissions. Therefore, this issue will be analyzed in the EIR.

VIII. Hazards and Hazardous Materials	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☒	☐	☐	☐
c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☒	☐	☐	☐
d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☒	☐	☐	☐
e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f. Be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☒	☐	☐	☐
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less-than-Significant Impact. The proposed project would be required to comply with federal, state, and local regulations for the routine transport, use, and disposal of any hazardous materials. These regulations include the Resource Conservation and Recovery Act (RCRA), U.S. Department of

Transportation (DOT) Hazardous Materials Regulations (Code of Federal Regulations [CFR] Title 49), California Health and Safety Code, and San Diego County Code, Title 6, Division 8, in combination with legally required construction BMPs implemented from the SWPPP (under the General Construction Permit). Moreover, the proposed project would only include common hazardous materials such as fuels, oils, and solvents in relatively small quantities associated with an increase in recreational marine vessels, movements associated with rail cars, and the construction and operation of commercial recreational uses such as the proposed hotels. Any accidental release of these materials due to spills or leaks would be cleaned up in the normal course of business, consistent with the above-mentioned regulations. Therefore, impacts associated with the potential to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant, and further discussion in the EIR is not warranted.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. See the response to VIII.a. Construction-related hazardous materials would be used during project construction, including fuel, solvents, paints, oils, and grease. Any of these substances could be released during construction activities. However, compliance with federal, state, and local regulations in combination with legally required construction BMPs implemented from the SWPPP (under the General Construction Permit) would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to a hazardous materials release during the construction phase of the project. Therefore, construction-related impacts associated with the creation of a significant hazard will not be analyzed further in the EIR.

Searches conducted using the State Water Resources Control Board (SWRCB) website (GeoTracker) and the California Department of Toxic Substances Control database (EnviroStor) online records, along with documents obtained from the County of San Diego Department of Environmental Health, indicate that several closed hazardous materials sites are located near the proposed project. In addition, Geotracker identified one open case adjacent and east of the proposed Tidelands Avenue Closures component of the proposed project. The active Cleanup Program Site is identified as *Bayshore Bikeway Segments 4B & 5* and was opened as of February 28, 2017 and will need to be further analyzed in the EIR (SWRCB 2018). It is possible that construction activities (i.e., grading and excavation) related to the project may encounter residual soil contamination given the location of these former contamination sites as well as the open Cleanup Program Site mentioned above. In addition, previous record searches indicated the National City Dump (or the Davies Dump) operated as a burn dump in the 1940s and 1950s in the project vicinity (District 2016). Construction activities at the proposed project sites could have the potential to disturb buried burn ash. This issue will be further analyzed in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Potentially Significant Impact. Project construction would require the use of typical materials associated with construction activities (e.g., diesel fuel, gasoline, oil, hydraulic fluid, asphalt and binders, and paint). Any hazardous materials used during project construction would be

transported, used, and stored in accordance with state and federal regulations, as described above under VIII.b, regarding hazardous materials.

Hotel and retail operations proposed by the project would also use solvents, cleaning agents, paints, pesticides, fuels, propane, antifreeze, oil filters, used oil, mercury lamps, batteries, and aerosol cans. These hazardous material products are generally used in small amounts, and any potential hazardous releases would be limited in scope and spill area and would be cleaned up soon after they occur as required by existing regulations, including the RCRA and the NPDES permit. Rail operations would be similar to existing operations and would comply with applicable laws and regulations.

The nearest school is Kimball Elementary School, approximately 0.25 mile east of the Bayshore Bikeway alignment site. Because the project is located within 0.25 mile of an existing school, this is considered to be a potentially significant impact, and further discussion will be provided in the EIR.

Therefore, project construction and operations would result in a less-than-significant impact related to hazards to the public or to the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Further discussion in the EIR is not warranted.

d. Be located on a site that is included on a list of hazardous materials sites that is compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. See the response to VIII.b. Given how close the open Cleanup Program Site is to the project sites, the EIR will provide a further analysis of the potential for the proposed project to be located on a listed hazardous materials site. Specifically, the demolition and construction activities associated with the Pasha Road Closures Component along Tidelands Avenue could disturb contaminated soil. This is considered to be a potentially significant impact, and further discussion will be provided in the EIR.

e. For a project within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The project sites are not within the Airport Influence Area of any airport as defined by an Airport Land Use Compatibility Plan. The San Diego International Airport is more than 5 miles to the north of the project sites. As such, implementation of the proposed project would not result in a safety hazard for people residing or working in the project area. No impact would occur, and further discussion in the EIR is not warranted.

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The proposed project area is not within the vicinity of a private airstrip. The closest non-public airstrip facilities to the project sites are Naval Air Station (NAS) North Island and Naval Outlying Landing Field (NOLF) Imperial Beach. Both are approximately 5.5 miles from the project, with NAS North Island being closest to the north end of the project area and NOLF Imperial Beach being closest to the south end. As such, implementation of the proposed project would not result in a safety hazard for people residing or working in the project area. No impact would occur, and further discussion in the EIR is not warranted.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact. Implementation of the proposed project could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. As part of the proposed project, closure of Tidelands Avenue between Bay Marina Drive on the north and West 32nd Street on the south, and West 28th Street between Tidelands Avenue and Quay Avenue, and the potential narrowing or closure (to thru-traffic) of Bay Marina Drive at Marina Way may affect an adopted emergency response plan or emergency evacuation plan. The proposed project would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services' Operational Area Emergency Plan, the National City Police Department, and the National City Fire Department. The Office of Emergency Services coordinates emergency response at the local level in the event of a disaster, including fires. Emergency response coordination is facilitated by the Operational Area Emergency Operations Center and responding agencies to the proposed project sites, the Southern Division of the National City Police Department, National City Fire Department Station No. 34, and San Diego Harbor Police Department. Because the project would change access in the area, further analysis will be provided in the EIR.

h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The project sites are not within or adjacent to an area that has been identified as a wildland fire hazard area. According to the Very High Fire Hazard Severity Zone maps prepared by the California Department of Forestry and Fire Protection (2009), the proposed project is not within a High Fire Risk Area. Furthermore, the proposed project area is neither adjacent to nor intermixed with wildlands. No impacts would occur, and further discussion in the EIR is not warranted.

IX. Hydrology and Water Quality		Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Violate any water quality standards or waste discharge requirements?	☒	☐	☐	☐
b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation onsite or offsite?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite?	☐	☐	☒	☐
e.	Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
f.	Otherwise substantially degrade water quality?	☒	☐	☐	☐
g.	Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j.	Contribute to inundation by seiche, tsunami, or mudflow?	☒	☐	☐	☐

a. Violate any water quality standards or waste discharge requirements?

Potentially Significant Impact. Construction activities associated with the various physical components of the proposed project could potentially violate water quality standards or waste discharge requirements. Construction activities such as demolition, grading and excavation, filling and compaction, rail improvements, marina expansion, and construction of above-ground facilities and buildings could degrade water quality by increasing polluted stormwater runoff. With heavy rain or wind conditions, during excavation or other ground-disturbing activities, erosion and sediment transport from the project sites and on- and offsite staging areas could increase. Stormwater runoff (or wind) could carry the exposed or eroded sediments to the storm drain system or directly into the Bay. Additionally, other pollutants, such as nutrients, trace metals, and hydrocarbons, can attach to sediment and be transported to the Bay, which could contribute to water quality degradation. Delivery, handling, and storage of construction materials and wastes, as well as the use of construction equipment, could also contaminate stormwater and affect water quality. As such, construction activities could violate water quality standards or waste discharge requirements.

In sum, impacts from construction could include polluted stormwater runoff, erosion and sediment transport, hazardous materials contamination, or physical changes to the aquatic ecosystem. Accordingly, construction impacts on water quality would be potentially significant and could lead to exceedance of water quality objectives or criteria. This issue area will be analyzed in the EIR.

Operation of the proposed project would increase impervious surface area and change land uses. The proposed project would develop existing undeveloped parcels (part of the GB Capital Component, and part of the City Program – Development Component) that would increase the impervious cover on the project sites, thus changing land use and increase the amount of pollutants generated on site that could discharge into the Bay during a storm event. Adding commercial and industrial uses could generate additional pollutants that could impair water quality if not treated prior to discharge. Typical pollutants associated with commercial and industrial land uses include but are not limited to suspended solids, pathogens, nutrients, pesticides, organic compounds, metals, trash/debris, oxygen-demanding substances, and oil and grease. The result may (further) impair receiving waters. Therefore, the proposed project could result in potentially significant impacts related to a violation of water quality standards or waste discharge requirements. This issue area will be analyzed in the EIR.

b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Less-than-Significant Impact. The project sites are located within the Sweetwater Groundwater Basin. The primary recharge of the Sweetwater Valley Groundwater Basin is derived from seasonal runoff from precipitation in the upper reaches of the basin and from the Sweetwater Reservoir, including subsurface flows. Although the proposed project would increase the impervious surface area by developing some disturbed but undeveloped parcels, groundwater recharge would not be reduced by the proposed project. Groundwater beneath the project sites is largely seawater. While the proposed project would replace a portion of the existing landscaped pervious surface that contributes to groundwater recharge, because the groundwater is mainly seawater infiltrating the soils under the project sites, the project would not interfere substantially with groundwater

recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The proposed project does not include any wells to pump groundwater. Impacts related to substantial depletion of groundwater supplies and recharge would be less than significant, and further discussion in the EIR is not warranted.

Short-term dewatering may be necessary during construction of proposed foundations below 10 feet. Discharge of groundwater into storm drains and receiving waters has the potential to significantly affect water quality. However, the proposed project would be required to comply with dewatering requirements imposed by the San Diego Regional Water Quality Control Board general waste discharge requirements for discharges from temporary groundwater extraction and similar waste discharges to San Diego Bay (Order No. R9-2015-0013). The proposed project would be required to maintain compliance with the effluent limitations applicable to the receiving water, as specified in Order No. R9-2015-0013 (refer to Table 8 of the order). The permit requires permittees to conduct monitoring of dewatering discharges and adhere to effluent and receiving water limitations contained within the permit so that water quality of surface waters is protected. Compliance with the applicable dewatering permit would further ensure that the impacts of these discharges would be less than significant, and further discussion in the EIR is not warranted.

Groundwater at the project sites is not used for drinking water and consequently would not impact drinking water. Impacts related to lowering the groundwater table and groundwater recharge would be less than significant, and further discussion in the EIR is not warranted.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on site or off site?

Less-than-Significant Impact. Implementation of the proposed project would not substantially alter the existing drainage pattern of the project sites, including through the alteration of the course of a stream or river. The proposed project would continue to discharge directly to the San Diego Bay and would not result in erosion or siltation by nature of the receiving Bay waters (i.e., not a typical channel with bed and banks subject to erosion). Therefore, the proposed project does not include changes to the existing storm drain system that would result in substantial erosion or siltation on site or off site. However, stormwater discharges from the site would be treated in accordance with the District's or City's JRMP and directed to the storm drain system and discharge to San Diego Bay. Therefore, downstream erosion would not occur. Impacts related to substantial erosion or siltation on site or off site would be less than significant. However, this issue area will be evaluated further in the EIR to identify compliance methods with the District's or City's JRMP.

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site?

Less-than-Significant Impact. The existing drainage patterns would not be substantially altered; no streams or rivers exist on site. The proposed project would develop some existing undeveloped parcels, which would increase the rate or amount of stormwater runoff due to the additional impervious surface area. The increased runoff would be managed by the inclusion of new stormwater facilities in compliance with the District's or City's JRMP; the stormwater would continue to discharge directly to the San Diego Bay and would not result in flooding by nature of the receiving Bay waters. Therefore, potential for flooding on site or off site is low. However, this issue area will be evaluated further in the EIR to identify compliance with the District's or City's JRMP.

e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. The proposed project would not result in a significant increase in runoff water compared to the existing conditions because the project sites are mostly developed or graded. However, the proposed project would increase impervious surfaces associated with development of the undeveloped parcels in the GB Capital Component and the City Program – Development Component. Those new land uses, compared to existing conditions, may result in additional sources of polluted runoff during construction and operational activities, as discussed under IX.a. Therefore, this issue will be further analyzed in the EIR.

f. Otherwise substantially degrade water quality?

Potentially Significant Impact. As described under IX.a and IX.e, the proposed project would result in potentially significant short-term construction and long-term operational impacts on water quality. Therefore, impacts could be potentially significant, and this issue area will be further analyzed in the EIR.

g. Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. No housing is proposed on site, nor are the sites on a 100-year floodplain. The Federal Emergency Management Agency (FEMA) delineates floodplains throughout the nation and presents the data on Flood Insurance Rate Maps, which illustrate that the proposed project sites are outside of the 100-year floodplain (FEMA 2014). Therefore, no related impacts would occur, and further discussion in the EIR is not warranted.

h. Place within a 100-year flood hazard area structures that would impede or redirect flood flows?

No Impact. As indicated above under IX.g, the proposed project sites are not within a 100-year floodplain. Therefore, no impact would occur, and further discussion in the EIR is not warranted.

i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less-than-Significant Impact. Dam failures are rated as a low-probability, high-loss event. Only two major dam failures have ever been recorded in San Diego County. These occurred in 1916 and were caused by a flood event (County of San Diego 2010). The project sites are downstream of the Sweetwater Dam, which is approximately 6 miles to the east. The Sweetwater Dam was given a condition assessment of "fair" in 2017 by the California Natural Resources Agency, Department of Water Resources, Division of Safety of Dams (NRA 2017). In the event of a dam failure or failure of the levees along the Sweetwater River Channel, portions of National City including the project sites, are at high risk of inundation (County of San Diego 2011). An emergency evacuation plan is in place for the Sweetwater Dam, however, and would be implemented in the unlikely event that the dam fails.

Construction and operation of the proposed project would develop some existing undeveloped parcels that would expose additional people and structures to risk of flooding from dam inundation in the event of dam failure. While new structures would be located within areas prone to flooding, the proposed project would not exacerbate the flooding potential of the project sites or the effects of

flooding on the existing environment and would not impair dam safety. Impacts would be less than significant, and further discussion in the EIR is not warranted.

j. Contribute to inundation by seiche, tsunami, or mudflow?

Potentially Significant Impact. The California Emergency Management Agency has developed detailed tsunami inundation maps. According to the maps for National City, portions of the project sites are located within the tsunami hazard zone (California Department of Conservation 2009). Therefore, the project would result in impacts related to potential tsunami inundation, and this issue would require further analysis in the EIR.

Seiches are waves generated in an enclosed body of water, such as the Sweetwater Reservoir, approximately 6 miles to the east of the project sites, from seismic activity. Seiches are similar to tsunamis but are for enclosed bays, inlets, and lakes. These tsunami-like waves can be generated by earthquakes, subsidence or uplift of large blocks of land, submarine and onshore landslides, sediment failures, and volcanic eruptions. The strong currents associated with these events may be more damaging than inundation by waves. Sweetwater Reservoir is considered to be too far away to affect the project sites. The closest body of water that could experience an earthquake-induced seiche is San Diego Bay, adjacent to the project sites. However, it is generally believed that a seismic event of sufficient magnitude to cause a seiche capable of causing significant damage would be of unprecedented scale for the region and, therefore, is remote and speculative (City of San Diego 2007). Therefore, no impact on the project sites would result from inundation caused by a seiche, and further discussion in the EIR is not warranted.

The risk of mudslides, or flood-induced landslides, is determined by a combination of factors, including slopes with gradient of 25% or greater, soil series data, and soil-slip susceptibility. Steep topography and high levels of precipitation are the primary requirements to generate a mudflow. The project sites are in an area with generally flat topography that does not have the relief or slope to support a mudflow (City of National City 2012). Therefore, the proposed project would not result in impacts associated with mudflows, and further discussion in the EIR is not warranted.

X. Land Use and Planning	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☒	☐	☐	☐

a. Physically divide an established community?

No Impact. The proposed project would not physically divide an established community. The proposed project would reconfigure the existing mix of land uses in the National City Marina District and nearby City Program sites to create a better connected area for commercial-recreational development while allowing improvements to the existing industrial areas by closing District streets to allow for contiguous cargo storage areas. No impact would occur, and further discussion in the EIR is not warranted.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The project would require a PMPA, Coastal Development Permits, and amendments to City planning documents (i.e., General Plan, Local Coastal Program, Harbor District Specific Area Plan, Land Use Code, and Bicycle Master Plan). The EIR will discuss consistency with all applicable objectives and policies from all the relevant regulations and plans, including Chapters 3 and 8 of the Coastal Act. Sea level rise and consistency with the Coastal Act will also be included in the proposed climate change analysis (see Section VII, *Greenhouse Gas Emissions*). Therefore, this issue will be analyzed further in the EIR.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

Potentially Significant Impact. Please see the response to IV.f., which provides the response to the same question. As stated previously, this issue will be discussed further in the EIR.

XI. Mineral Resources	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

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?

No Impact. The project sites are in an area characterized by marine-related industrial activities and visitor-serving commercial uses that does not contain any known mineral resources. No commercial mining operations exist on the project sites or in the immediate vicinity. The project sites and the surrounding area are not designated or zoned as land with the availability of mineral resources (City of San Diego 2008). The proposed project is located within Mineral Resource Zone (MRZ)-1, which indicates that no significant mineral deposits are present or they are unlikely to exist (CGS 2017). In addition, the project sites do not contain aggregate resources and are not located in a mineral resource zone that contains important resources, as designated by the California Department of Conservation Division of Mines and Geology. Therefore, the proposed project would not result in a loss of known mineral resources. No impact would occur, and further discussion in the EIR is not warranted.

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?

No Impact. See the response to XI.a. The PMP and City Planning Documents do not identify any mineral resources in the area or designated plans for mineral resource extraction. The project sites and the surrounding area contain a limited amount of land suitable for the extraction of mineral resources. Salt production occurs approximately 2.6 miles south of the project site within the South San Diego Bay Unit of the San Diego National Wildlife Refuge. However, salt ponds are not located within the project sites and would not be impacted by implementation of the proposed project (City of San Diego 2008). The project would not result in the loss of availability of a known mineral resource or regionally or locally important mineral resource recovery site. No impact would occur, and further discussion in the EIR is not warranted.

XII. Noise	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☒	☐	☐	☐
b. Expose persons to or generate excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
d. Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e. Be located within an airport land use plan area, or, where such a plan has not been adopted, within two miles of a public airport or public use airport and expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. Be located in the vicinity of a private airstrip and expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

a. Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Project construction and operation would result in additional noise sources, as discussed below. Construction and operational noise will be analyzed in the EIR in relation to their impact on sensitive noise receptors. Noise-sensitive land uses typically include residential uses, hospitals, nursing facilities, places of worship, open space, intermediate care facilities, child educational facilities, libraries, museums, and childcare facilities (National City 2011). The District also considers parks and hotels to be noise sensitive during certain hours of operation. Parks, which are closed during nighttime hours, are considered to be noise sensitive only during the daytime and evening hours of 7 a.m. to 10 p.m. Hotels are considered to be noise sensitive only during the evening and nighttime hours of 7 p.m. to 7 a.m. The nearest sensitive noise receptors to the project sites are residences to the north, on Cleveland Avenue at W 22nd Street, and the Best Western Marina Gateway Hotel at Bay Marina Drive and Marina Way. The proposed bikeway alignment would also pass existing homes on McKinley Avenue. Additional noise-sensitive uses are generally located farther from the proposed project, on the opposite (i.e., east) side of Interstate 5. Pepper Park would typically be considered a noise-sensitive receptor; however, because in this case the park is actually part of the proposed project, it may not be considered a noise-sensitive receptor in this instance. The park's relationship to the other elements of the proposed project will be considered further in the EIR.

Use of equipment associated with project construction would temporarily increase the ambient noise levels in the project vicinity above levels existing without the proposed project. Construction noise sources are anticipated to include pile drivers, dewatering pumps, cranes, forklifts, concrete trucks, bulldozers, bobcats, excavators, backhoes, and concrete pump-towers. Due to the proximity of noise-sensitive receptors, construction noise impacts are potentially significant. Therefore, the EIR will analyze potential construction noise impacts based on the details of the equipment required for the various construction phases (demolition, grading, etc.) and of each project component.

In-water construction activities would potentially occur as part of the GB Capital Component, including additional moorings and improvements to the marina. Underwater (hydroacoustic) noise levels associated with in-water construction activities will also be analyzed in the EIR.

Project operational noise sources would include additional traffic on the surrounding streets and occasional events at Pepper Park. It is anticipated that there would be no noticeable change in noise levels associated with rail use or cargo activities as these uses already exist and it is not anticipated that there would be a significant increase in operations. Noise associated with the onsite operations at the proposed hotels, RV park, and other visitor-serving commercial uses would generally be limited and localized to the project sites. Offsite noise is expected to be limited mainly to vehicular noise on the surrounding roadways. However, the EIR will analyze the potential for any land use compatibility issues and significant operational noise increases from the project.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. On-road vehicular traffic does not typically produce perceptible levels of vibration outside of the right-of-way, and the proposed onsite operational activities do not include substantial vibration sources that would generate perceptible levels of vibration beyond the project boundaries. Therefore, further analysis of these operational elements of the project is not required. The primary sources of groundborne vibration and noise associated with the project would be heavy construction activities (such as pile driving, demolition, and grading) and freight rail operations. Vibration from trains is unlikely to be significant due to the distance from sensitive receptors. Nonetheless, vibration from both construction activities and rail operations will be evaluated in the EIR.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. See response to XII.a. Construction noise would be temporary and, as such, would not cause any permanent increases in ambient noise levels. Permanent operational noise sources associated with the project could include additional traffic on the surrounding streets and onsite operations at the proposed new uses (hotels, RV park, and other visitor-serving commercial uses). This issue area will be analyzed in the EIR.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact. Project construction activities may result in an increase in temporary or periodic increase in ambient noise levels that could impact sensitive receptors. In addition, occasional events at Pepper Park may result in substantial temporary noise increases. Therefore, the project's potential to result in temporary or periodic increases in ambient noise would be potentially significant and will be evaluated in the EIR.

e. For a project located within an airport land use land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project sites are not within the Airport Influence Area of any airport as defined by an Airport Land Use Compatibility Plan. The San Diego International Airport is more than 5 miles to the north of the project sites. As a result, the project would not expose people residing or working within the project area to excessive airport noise levels. There would be no impact, and further discussion in the EIR is not warranted.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. There are no private airstrips within 2 miles of the project sites. The closest non-public air facilities to the project sites are NAS North Island and NOLF Imperial Beach. Both are approximately 5.5 miles from the project, with NAS North Island being closest to the north end of the project area and NOLF Imperial Beach being closest to the south end. As a result, the project would not expose people residing or working within the project area to excessive private airstrip noise levels. There would be no impact, and further discussion in the EIR is not warranted.

XIII. Population and Housing	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☒	☐	☐	☐
b. Displace a substantial number of existing housing units, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace a substantial number of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

Potentially Significant Impact. The proposed project would expand operational activities in the area and would create additional operational jobs.

The proposed project would not extend, or create the need for, infrastructure expansion into previously undeveloped areas. The project sites are currently served by existing roadways, water, wastewater, gas, and electrical infrastructure. Land uses that surround the project sites are also served by existing utilities. The proposed project would not involve the addition of any growth-inducing infrastructure, including water and gas lines or electricity, into previously undeveloped areas, because the project sites are within a developed area.

The implementation of the proposed project would require the addition of new employees and would temporarily increase the number of construction workers in the area. The additional jobs are anticipated to be filled by residents currently living in the San Diego region; however, it is possible the additional job opportunities could induce population growth to the area due to relocation to the area. Because the development would require an amendment, and is not currently planned for these parcels, the potential jobs created as a result of the proposed project could result in inducing population growth in the surrounding area that has not been previously anticipated. This issue area will be further analyzed in the EIR.

b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project sites are currently developed with maritime industrial, commercial, and recreational uses, and no existing housing units or persons are located on the project sites. No residential land uses are within the project sites or surrounding area. The proposed project would not displace any housing units or necessitate the construction of housing units elsewhere. Therefore, there would be no impact, and further discussion in the EIR is not warranted.

c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. As discussed under XIII.a and XIII.b above, the project sites are currently developed with maritime industrial, commercial, and recreational uses, and no existing housing units or persons are located on the project sites. Implementation of the proposed project would not result in the displacement of people, nor would it necessitate the construction of replacement housing elsewhere. Therefore, no impact would occur, and further discussion in the EIR is not warranted.

XIV. Public Services	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
1. Fire protection?	☒	☐	☐	☐
2. Police protection?	☒	☐	☐	☐
3. Schools?	☒	☐	☐	☐
4. Parks?	☒	☐	☐	☐
5. Other public facilities?	☒	☐	☐	☐

a. Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:

1. Fire protection?

Potentially Significant Impact. Implementation of the proposed project would lead to more visitors to the project area and would create new structures in areas where there are currently none. This would potentially place increased demand on the National City Fire Department and the Harbor Police Department, both of which provide fire protection services to the project area. Although it is unlikely that the proposed project would require a new fire station or expansion of an existing one, this issue requires further analysis in the EIR.

2. Police protection?

Potentially Significant Impact. The proposed project would result in an increase in visitors to the area and additional employees during construction and operation of the proposed project. As such, the proposed project may increase the demand on the National City Police Department and the Harbor Police Department. As with fire protection services, although it is unlikely that the proposed project would require new or expanded police protection facilities, this issue requires further analysis and will be discussed in the EIR.

3. Schools?

Potentially Significant Impact. Physical impacts on school facilities and services are typically associated with population in-migration and growth, which increase the demand for schools, the construction of which may result in physical impacts on the environment. Implementation of the

proposed project would potentially increase the number of jobs that would be created as a result of construction and operation of the project. These jobs are anticipated to be filled by the local residents in the San Diego region; however, it is possible the increase in job opportunities could induce population growth not currently planned to fill the new jobs. Population growth in the area could result in higher demand for the neighborhood schools, which could result in a need for new or physically altered school facilities. This issue area will be further analyzed in the EIR.

4. Parks?

Potentially Significant Impact. As discussed below in Section XV, *Recreation*, Pepper Park is located within the project site and would be expanded by approximately 2.54 acres from approximately 5.22 acres to approximately 7.76 acres under the proposed project. The project also includes modifications to existing operational restrictions and an expansion of allowed uses (i.e., aquaculture or environmental conservation) that could increase the use of the Aquatic Center. Impacts associated with the expansion of and increased use of recreational facilities could result in a significant impact. This issue area will be further analyzed in the EIR.

5. Other public facilities?

Potentially Significant Impact. As discussed above, the proposed project could induce local population growth has a result of creating additional jobs. This population increase may result in an increased demand requiring the need for new or physically altered public facilities, for example public libraries or post offices, and could result in a significant impact. This issue area will be further analyzed in the EIR.

XV. Recreation	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☒	☐	☐	☐
b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☒	☐	☐	☐

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Potentially Significant Impact. The proposed project would expand Pepper Park by approximately 2.54 acres from approximately 5.22 acres to approximately 7.76 acres. Although the Pepper Park expansion has not yet been designed, the EIR will analyze possible park features, which may or may not ultimately be included in the final design of the park. In addition, the project includes modifications to existing operational restrictions and expansion of allowed uses (i.e., aquaculture or environmental conservation) that could increase the use of the recreational facility. This issue area will be further analyzed in the EIR.

b. Include recreational facilities or require the construction of or expansion of recreational facilities that might have an adverse physical effect on the environment?

Potentially Significant Impact. The proposed project would include expansion of recreational facilities that may result in an adverse physical effect on the environment. The proposed project includes modifications to operational restrictions and an expansion of allowed uses (i.e., aquaculture or environmental conservation) of the Aquatic Center and expansion of Pepper Park, and also includes construction and operation of Segment 5 of Bayshore Bikeway. The GB Capital Component also includes construction and operation of new and expanded recreational facilities. Therefore, the proposed project would include recreational facilities or require the construction or expansion of other recreational facilities that might have an adverse physical effect on the environment. This issue area will be analyzed in the EIR.

XVI. Transportation/Traffic	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d. Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☒	☐	☐	☐
e. Result in inadequate emergency access?	☒	☐	☐	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Potentially Significant Impact. The proposed project would increase the number of daily and, potentially, peak hour trips to and from the project area. As such, a Transportation Impact Analysis (TIA) will be prepared to assess roadway segments, intersections, and freeway mainline segments. A net trip generation change based on the proposed land and water use changes will be developed and assigned trips to the adjacent roadway network based on trip generation estimates and existing travel patterns and redistribute exiting trips that may be affected by the proposed network changes. The TIA will include an analysis of both construction and operational traffic, a parking analysis, as well as calculating the project's fair share percentages in the mitigation measures. Impact

determinations based on Appendix G of the State CEQA Guidelines, along with any necessary mitigation, will be summarized in the EIR.

b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Potentially Significant Impact. The designated congestion management agency for the San Diego region is SANDAG. In 2009, the San Diego region elected to be exempt from the state Congestion Management Plan and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. *San Diego Forward: The Regional Plan* (Regional Plan), the region's Regional Transportation Plan and Sustainable Communities Strategy, meets the requirements of 23 CFR 450.320 (SANDAG 2015).

Therefore, to determine if the proposed project would conflict with an applicable congestion management program, the proposed project was reviewed for consistency with the Regional Plan, which is a land use and transportation planning document that discusses land use policy at a very general level. The Regional Plan mostly incorporates the land use policies of local jurisdictions and focuses on transportation infrastructure and management programs to support those policies. The project proposes changes to land use designations that could conflict with the Regional Plan. As such, further analysis will be included in the EIR.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The closest air facilities to the project sites are NAS North Island, NOLF Imperial Beach, and San Diego International Airport, the closest of which is more than 5 miles from the project sites. In addition, the project sites are not within the Airport Influence Area of any airport as defined by an Airport Land Use Compatibility Plan or within the Airport Impact Zones for any of these airports (NOLF Imperial Beach ALUCP 2015, SDIA ALUCP 2014). Furthermore, the proposed project would not involve the development of any structure within the Airport Influence Area that would extend into airspace or be tall enough to result in a change in air traffic patterns or a change in location. Therefore, the project would not result in a change in air traffic patterns or otherwise result in a safety risk. There would be no impacts, and further discussion in the EIR is not warranted.

d. Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Potentially Significant Impact. The evaluation of potential increases in hazards because of a design feature typically involves determining if any project-related features would result in changes to the circulation system that could affect automobile traffic or pedestrians. Some examples include poor sight-distance at intersections, sharp roadway curves, and driveway/site access along a high-speed roadway. The proposed project would include two road closures (portions of Tidelands Avenue and West 28th Street), realignment of Marina Way, and the potential narrowing of Bay Marina Drive from its current four lanes to two, as well as a complete closure, to thru-traffic. As such, the creation of a road hazard will be analyzed in the EIR.

e. Result in inadequate emergency access?

Potentially Significant Impact. See response to VIII.g. The proposed project would involve closure of Tidelands Avenue between Bay Marina Drive and West 32nd Street, and West 28th Street

between Tidelands Avenue and Quay Avenue, and the potential narrowing or closure (to thru-traffic) of Bay Marina Drive west of Marina Way. The EIR will further evaluate impacts associated with these potential closures.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Potentially Significant Impact. The proposed project includes the construction and operation of Segment 5 of the Bayshore Bikeway. In addition, the project would close and modify roads that currently provide access to the project area. Potential impacts relating to public transit, bicycle, and pedestrian facilities and the plans, performance, and safety of such facilities will be analyzed in the EIR.

XVII. Tribal Cultural Resources	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or an object with cultural value to a California Native American tribe and:				
a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	☒
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or an object with cultural value to a California Native American tribe and:

a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k)?

No Impact. A records search at the South Coastal Information Center was conducted for a District-wide study of cultural resources to determine if previously recorded tribal cultural resources are present within the project sites. No tribal cultural resources that are listed in or eligible for listing in the California Register of Historical Resources were identified during the records search. Additionally, a Sacred Lands File Search of the project area was obtained on April 27, 2017, from the Native American Heritage Commission (NAHC) as part of the District-wide cultural resources study. No Sacred Lands were identified by the NAHC. Because there are no Tribal Cultural Resources eligible for listing in the CRHR in the project area, there would be no impact. Further discussion in the EIR is not warranted.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less-than-Significant Impact. Pursuant to Public Resources Code section 21080.3.1 (Assembly Bill [AB] 52), California Native American tribes traditionally and culturally affiliated with the project

area can request notification of projects in their traditional cultural territory. The District has not received a request for AB 52 project notifications from any local Native American tribes. Additionally, the District has not received a specific AB 52 consultation request for the proposed project.

Due to the developed nature of the project sites and the surrounding area, and the lack of requested notification by tribes, it is unlikely that significant tribal cultural resources would be encountered during construction of the proposed project. Therefore, impacts would be less than significant, and further discussion in the EIR is not warranted.

XVII. Utilities and Service Systems	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☒	☐	☐	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☒	☐	☐	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?	☒	☐	☐	☐
e. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☒	☐	☐	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☒	☐	☐	☐
h. Result in the wasteful, inefficient, and unnecessary consumption of energy?	☒	☐	☐	☐

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Potentially Significant Impact. The proposed project includes features such as the GB Capital Component and the City Program – Development Component that could further expand commercial uses in the area. These components would generate additional wastewater compared with existing conditions due to the increase in employees and visitors. Although it is not anticipated that the additional wastewater would exceed the requirements of the Regional Water Quality Control Board, this impact will be further discussed in the EIR.

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. The proposed construction and operation of visitor-serving commercial uses, such as hotels would increase water and wastewater demand compared to existing conditions. Further discussion of the need for new or expanded water or wastewater infrastructure will be discussed in the EIR.

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact. The existing drainage patterns would not be substantially altered with the proposed project; no streams or rivers exist on site. The proposed project would develop some existing undeveloped parcels, which would increase the rate or amount of stormwater runoff from new impervious surface areas. This runoff would be managed by new stormwater facilities in compliance with the District's or City's JRMP and would discharge directly to the San Diego Bay.

The proposed project would not result in a significant increase in stormwater runoff compared to existing conditions because the project sites are mostly developed or graded. However, it would increase impervious surfaces associated with development of some undeveloped parcels. Under the proposed project, the new land uses would increase the amount of impervious surface, which would increase stormwater runoff during construction and operations and may result in the construction of new stormwater drainage facilities. This issue area will be further discussed in the EIR.

d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed?

Potentially Significant Impact. The proposed project would increase water demand related to increased development associated with operation of up to five hotels, an RV park, modular cabins, expanded marina, restaurant, retail, and/or other combination of tourist/visitor-serving commercial development. The project's additional water demand estimate will be discussed and analyzed using the generation rates in the Sweetwater Authority's Urban Water Management Plan in the EIR.

e. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. The proposed project would generate additional wastewater related to the GB Capital Component and the City Program – Development Component as more employees and visitors will be utilizing wastewater services in the future. Further discussion of wastewater generation will be included in the EIR.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Potentially Significant Impact. Several solid waste landfills serve the disposal needs of the region. Construction activities would generate solid waste that would require disposal in local landfills. The amount and type of construction solid waste will be analyzed further in the EIR. During site preparation, concrete and other materials associated with construction activities would be exported off site to an approved facility for recycling and disposal. During operations, waste associated with

the additional permanent employees and increased visitor use would be generated. Therefore, further discussion in the EIR is warranted.

g. Comply with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact. Diversion rates are used to report solid waste disposal in National City and to address AB 939 recycling goals, which require each city in the state to divert at least 50% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting. In October 2014 AB 1826 required all businesses to recycle their organic waste beginning in April 1, 2016, depending on the amount of waste they generate per week. This law also required local jurisdictions to implement an organic waste recycling program to divert organic waste generated by businesses. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. The phase-in of this mandate helps the state achieve its overall waste diversion (75% by 2020) and greenhouse gas emissions reduction goals.

During operations, the proposed project would introduce new employees to the area. In addition to solid waste generated by the additional employees, the RV park, modular cabins, hotels, restaurant, retail, and/or other combination of tourist/visitor-serving commercial development, and the expansion of Pepper Park would generate solid waste from hotel guests, and recreational users, as well as general operational activities. The proposed project would be required to comply with applicable waste diversion requirements, and concrete and building materials associated with demolition of existing structures (e.g., asphalt associated with demolition of the existing alignment of Marina Way) would be exported and recycled at one of several approved facilities in San Diego County. Further discussion of solid waste generation will be included in the EIR.

h. Result in the wasteful, inefficient, and unnecessary consumption of energy?

Potentially Significant Impact. The proposed project would increase energy use associated with the proposed increase in commercial uses in the project area. Operations would increase motor vehicle and boating fossil fuel combustion, electricity consumption, and natural gas consumption associated with retail, hotel, and marina uses.

According to Appendix F, Energy Conservation, of the State CEQA Guidelines, a project has the potential to result in wasteful, inefficient, and unnecessary consumption of energy when considering:

- The project's energy requirements and its energy-use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal.
- The effects of the project on local and regional energy supplies and requirements for additional capacity.
- The effects of the project on peak- and base-period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.

Considering the proposed project's potential increase in energy demand, impacts associated with the consumption of energy are considered potentially significant and will be further analyzed in the EIR.

XVIII. Mandatory Findings of Significance	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a. Does the project have the potential to 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?	☒	☐	☐	☐
b. Does the project 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.)	☒	☐	☐	☐
c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

a. Does the project have the potential to 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, 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?

Potentially Significant Impact. Based on the biological survey (Dudek 2017), Parcel B6, which is part of the Balanced Plan and the GB Capital Component, has been previously graded and is mostly disturbed but supports a small amount of scattered special-status plant species. Further evaluation will be provided in the EIR.

As part of the proposed project, in-water work is proposed to occur in the Bay, which would cause potential impacts on fish and marine mammal species. Because the site was not created until the mid-twentieth century using fill materials, the potential for any prehistoric resources to be affected is low. However, given the age of Granger Hall, which may potentially be relocated to Pepper Park as a project feature, the potential exists for impacts on historical buildings. As such, this issue will be further evaluated in the EIR.

b. Does the project 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.)

Potentially Significant Impact. State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable future projects. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-specific impacts and should be guided by the standards of practicality and reasonableness.

As determined by this Initial Study, there may be potentially significant effects related to aesthetics, air quality, biological resources, cultural resources, GHG emissions, hazards/hazardous materials, hydrology/water quality, land use and planning, noise, population/housing, public services, recreation, transportation/traffic, and utilities and service systems. Therefore, the project's potential contribution to cumulative impacts related to these resources will be discussed in the EIR.

Given that the project would have no impact on aesthetics, agriculture and forest resources, geologic hazards and soils, mineral resources, or tribal cultural resources, it was determined that the proposed project would have no potential to result in cumulative impacts related to these resource areas. Further discussion of the cumulative effect on these resources in the EIR is not warranted.

c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis above, the proposed project has the potential to result in significant impacts on air quality, biological resources, cultural resources, GHG emissions, hazards/hazardous materials, hydrology/water quality, land use and planning, noise, population/housing, public services, recreation, transportation/traffic, and utilities and service systems. As such, the project has the potential to result in environmental impacts that could cause substantial adverse effects on human beings, either directly or indirectly. Therefore, this issue area will be discussed in the EIR.

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