INITIAL STUDY/DRAFT MITIGATED NEGATIVE DECLARATION

STAY OPEN
San Diego Hotel Project and Port Master Plan Amendment

PREPARED FOR:
San Diego Unified Port District
3165 Pacific Highway, San Diego, CA 92101

AUGUST 2021

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Initial Study/Draft Mitigated Negative Declaration

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San Diego Unified Port District
3165 Pacific Highway, San Diego, CA 92101

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LIST OF ABBREVIATIONS

AB	Assembly Bill
ACC	Advanced Clean Cars
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
Annex Building	San Diego Unified Port District Annex Building
AQIA	Air Quality Impact Analysis
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMP	best management practices
BPC	Board of Port Commissioners
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFÉ	corporate average fuel economy
CalEEMod	California Emissions Estimator Model
California Energy Code	California Title 24, Part 6, Building Energy Efficiency Standards
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CEC	California Energy Commission
CEQA	California Environmental Quality Act
cfs	cubic feet per second
CH_4	methane
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
COC	Chemical of concern
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CWA	Clean Water Act
dB	decibel
diesel PM	particulate matter contained in diesel exhaust

District	San Diego Unified Port District
dn/D	Ratio of Depth of Flow Pipe Diameter
DOC	California Department of Conservation
DTSC	California Department of Toxic Substances Control
EIR	environmental impact report
EO	Executive Order
EOP	Emergency Operations Plan
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
FAA	Federal Aviation Administration
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
gpm	gallons per minute
GWP	global warming potential
HU	hydrologic unit
I-5	Interstate 5
in/sec	inches per second
IS/Draft MND	Initial Study/Draft Mitigated Negative Declaration
JRMP	Jurisdictional Runoff Management Program
L_{dn}	day-night average sound level
L_{eq}	Equivalent Continuous Sound Level
L_{max}	maximum noise level
LOS	level of service
LUST	leaking underground storage tank
MAS	make up air systems
MEP	mechanical, electrical, and plumbing
mgd	million gallons per day
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MOA	Memorandum of Agreement
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	City of San Diego Multiple Species Conservation Program

MT	metric ton
$MTCO_2e$	metric tons of carbon dioxide equivalent
MTS	Metropolitan Transit System
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASNI	Naval Air Station North Island
NCTD	North County Transit District
NDPES	National Pollutant Discharge Elimination System
NHTSA	National Highway Traffic and Safety Administration
NO_2	nitrogen dioxide
NO_X	oxides of nitrogen
NRHP	National Register of Historic Places
OPR	Governor's Office of Planning and Research
PCB	polychlorinated biphenyl
PLWTP	Point Loma Wastewater Treatment Plant
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to 10 microns in diameter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in diameter
PMP	Port Master Plan
PMPA	Port Master Plan Amendment
PPV	peak particle velocity
PRC	Public Resources Code
Project	STAY OPEN branded, shared accommodations hotel
PV	photovoltaic
RCRA	Resource Conservation and Recovery Act
RMS	root-mean-square
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas and Electric Company
SDGE	San Diego Gas & Electric
SDIA	San Diego International Airport

SDPD	City of San Diego Police Department
SGMA	Sustainable Groundwater Management Act
SMAQMD	Sacramento Metropolitan Air Quality Management District
SO_2	sulfur dioxide
SPL	sound pressure level
STAY OPEN	STAY OPEN San Diego, LLC
SWPPP	storm water pollution prevention plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
Technical Advisory	*Technical Advisory on Evaluating Transportation Impacts in CEQA*
TERP	Terminal Procedures
TIS	*Transportation Impact Study Vehicle Miles Traveled – SB 743 Analysis for the STAY OPEN San Diego Project*
TS	Threshold Siting Surface
TUOP	Tidelands Use and Occupancy Permit
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compounds
ZEV	zero-emission vehicle

EXECUTIVE SUMMARY

The San Diego Unified Port District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Initial Study/Draft Mitigated Negative Declaration (IS/Draft MND) to evaluate potential environmental effects of the STAY OPEN San Diego Hotel Project and Port Master Plan Amendment (Project, project, or Proposed Project). The Proposed Project includes redevelopment of the southern half of the existing District Annex Building (Annex Building) and part of the adjacent parking lot located at 3125 Pacific Highway, San Diego, CA into the STAY OPEN branded, shared accommodations hotel. The Project proponent is STAY OPEN San Diego, LLC. Chapter 2, "Project Description," presents the detailed project information. The Project site is located within Planning District 2, Harbor Island/Lindbergh Field, of the District's certified Port Master Plan (PMP).

This document has been prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.), the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.), and the District's Guidelines for Compliance with the California Environmental Quality Act (Resolution 97-191) (District 1997). Specifically, this document meets the requirements of CEQA Guidelines Sections 15070 and 15071 and District CEQA Guidelines Section V., and the environmental checklist (Chapter 3) meets the requirements of CEQA Guidelines Section 15063 and District CEQA Guidelines Section IV. An initial study is prepared by a lead agency to determine if a project may have a significant effect on the environment (State CEQA Guidelines Section 15063[a]), and thus to determine the appropriate environmental document. In accordance with State CEQA Guidelines Section 15070, a "public agency shall prepare…a proposed negative declaration or mitigated negative declaration…when: (a) The Initial Study shows that there is no substantial evidence…that the project may have a significant impact on the environment, or (b) The Initial Study identifies potentially significant effects but revisions to the project plans or proposal are agreed to by the applicant and such revisions would reduce potentially significant effects to a less-than-significant level." In this circumstance, the lead agency prepares a written statement describing its reasons for concluding that the project would not have a significant effect on the environment and, therefore, does not require the preparation of an environmental impact report (EIR). By contrast, an EIR is required when the project may have a significant environmental impact that cannot clearly be reduced to a less-than-significant effect by adoption of mitigation or by revisions in the project design.

PROJECT DESCRIPTION

STAY OPEN San Diego, LLC proposes to develop the southern half of the existing San Diego Unified Port District Annex Building and part of the adjacent parking lot located at 3125 Pacific Highway, San Diego, CA into the STAY OPEN branded hotel. The Project includes a two-story, approximately 31,000 square-foot STAY OPEN hotel and approximately 49,000 square-foot landscaped parking area.

The Project includes the following components: (1) hotel accommodations for a maximum of 294 overnight guests including POD rooms with 226 beds and 17 private rooms; (2) common areas including an atrium, lobby indoor/outdoor bar and café (maximum 286 seats), and rooftop restaurant and bar (maximum 179 seats); (3) vehicle parking (85 spaces) and motorcycle parking (6 spaces) including limited parking for restaurant patrons and overnight parking for hotel guests and dedicated space for shared transportation vehicles (scooters and bicycles); (4) approximately 11,000 square feet of landscaped and pervious surface area in the parking lot, which represents an increase of approximately 9,000 square feet more than the existing, approximately 2,000 square feet on the project site; (5) an approximately 5,000 square foot storm water treatment basin, and (6) a PMPA to allow for accommodations and associated amenities, including a restaurant, on the Project site; the PMPA would change the land use designation of the Project site from "Aviation Related Industrial" to "Commercial Recreation." The Project proponent, STAY OPEN San Diego, LLC, also seek issuance of a lease from the District for construction, operation, and maintenance of the Project.

FINDINGS

Chapter 3 of this document contains the analysis and discussion of potential environmental impacts of the project.

Based on the issues evaluated in that chapter, it was determined that the project would have either no impact or a less-than-significant impact related to the following issue areas: aesthetics, agriculture and forest resources; air quality; energy; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; mineral resources; noise; population and housing; public services; recreation; transportation; tribal cultural resources; utilities and service systems; and wildfire. Potentially significant impacts were identified for Biological Resources, Cultural Resources, and Geology and Soils; however, mitigation measures included in the IS/Draft MND would reduce the impacts to less-than-significant levels.

1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

As described in the Initial Study (Chapter 3), the project would not result in any unmitigated significant environmental impacts. Therefore, an IS/MND is the appropriate document for compliance with the requirements of CEQA. This IS/Draft MND conforms to these requirements and to the content requirements of State CEQA Guidelines Section 15071.

The District is the public agency with primary responsibility over approval of the Project and the lead agency under CEQA. The purpose of this document is to present to decision-makers and the public information about the environmental consequences of the Project. This IS/Draft MND is available to the public for review and comment for a 30-day public review period from August 17, 2021 to September 17, 2021.

Supporting documentation referenced in this document is available for review at:

San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Comments should be addressed to:

Anna Buzaitis, Program Manager
Planning Department
3165 Pacific Highway
San Diego, CA 92101

E-mail comments may be addressed to: abuzaiti@portofsandiego.org

Written comments (including via e-mail) should be postmarked by September 17, 2021.

After comments are received from the public and reviewing agencies, the District may (1) adopt the MND and approve the project; (2) undertake additional environmental studies; or (3) abandon the project.

1.2 DOCUMENT ORGANIZATION

This IS/Draft MND is organized as follows:

Chapter 1: Introduction. This chapter provides an introduction to the environmental review process. It describes the purpose and organization of this document as well as presents a summary of findings.

Chapter 2: Project Description and Background. This chapter describes the purpose of and need for the Project, identifies Project objectives, and provides a detailed description of the Project.

Chapter 3: Environmental Checklist. This chapter presents an analysis of a range of environmental issues identified in the CEQA Environmental Checklist and determines if the Project would result in no impact, a less-than-significant impact, a less-than-significant impact with mitigation incorporated, or a potentially significant impact. If any impacts were determined to be potentially significant, an EIR would be required. For this project, however, none of the impacts were determined to be significant after implementation of mitigation measures.

Chapter 4: References. This chapter lists the references used in preparation of this IS/Draft MND.

Chapter 5: List of Preparers. This chapter identifies report preparers.

1.3 MITIGATION MONITORING AND REPORTING PROGRAM

Mitigation Measure(s)	Responsible Party	Mitigation Timing
Biological Resources		
BIO-1: Avoid Direct Loss and Disturbance of Nesting Protected Birds For Project construction activities, including tree or vegetation removal, that begin between February 1 and September 15, a qualified biologist shall conduct preconstruction surveys to identify active bird nests on and within 50 feet of the Project site. The surveys shall be conducted no more than 14 days before construction commences. If no active nests are found during focused surveys, no further action under this measure shall be required. If nests are identified during the preconstruction surveys, impacts to nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction surveys. Buffer distances shall be established by a qualified biologist using available protocols published by State or federal agencies with jurisdiction over the observed species, or if no protocols are available, then based on the professional judgment and discretion of the qualified biologist. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. A qualified biologist shall establish a non-disturbance buffer at a distance sufficient to minimize nest disturbance based on the nest location, topography, cover, the species' sensitivity to disturbance, and the intensity/type of potential disturbance. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist.	**Implementation:** Project proponent **Monitoring and Reporting:** Qualified biologist approved by the District **Verification:** District	Prior to construction activities beginning between February 1 and September 15
Cultural Resources		
CUL-1: Unanticipated Discoveries of Archaeological Resources Before initiation of ground disturbance, the project applicant shall design and implement a Worker Awareness Training Pamphlet that shall be provided to all construction personnel and supervisors who will have the potential to encounter cultural resources. The pamphlet shall describe, at a minimum: ▶ types of cultural resources expected in the project area; ▶ types of evidence that indicate cultural resources might be present (e.g., trash scatters; historic-era bottles); ▶ what to do if a worker encounters a possible resource; ▶ what to do if a worker encounters bones or possible bones; and ▶ penalties for removing or intentionally disturbing cultural resources, such as those identified in the Archeological Resources Protection Act. In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. The District will be notified of the potential find and a qualified archaeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable	**Implementation:** Project proponent **Monitoring and Reporting:** Project proponent, qualified archaeologist approved by the District **Verification:** District	Prior to and during ground disturbance

Mitigation Measure(s)	Responsible Party	Mitigation Timing
CRHR regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), avoidance of the resource is the preferred treatment. If avoidance of the significant resource is not possible, the archaeologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If necessary, the data recovery plan will include a research design that will be developed, based on the type and nature of the significant resource, to answer scientific questions about our past that is in the public interest. The data recovery plan will also be performed in compliance with the Secretary of the Interior's Standards and Guidelines for Archaeology If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.		
Geology and Soils		
GEO-1: Compliance with Recommendations of the Geotechnical Study **Seismic Considerations** ▶ A Site Class D is recommended for the site in accordance with the 2019 California Building Code. ▶ During a design earthquake, liquefaction induced settlement may occur in the western portion of the building extending to near the center of the building. Liquefaction induced settlements are estimated to be 1-inch or less. ▶ Differential settlement due to liquefaction across 40 feet could be on the order of ½ inch within the building. **Earthwork** ▶ Removal/replacement of existing undocumented soils is recommended for new foundations. ▶ New footings along the eastern building wall may be extended into competent, natural formational material. ▶ Excavations and shoring systems should meet the minimum requirements given in the most current State of California Occupational Safety and Health Standards. ▶ Subgrade soils should be scarified to a depth of 8 inches, moisture-conditioned, and compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557. ▶ Fill soils should be placed in horizontal lifts, moisture-conditioned, and mechanically compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557. ▶ Fills consisting of the on-site or imported sandy soils should be placed at a moisture content over the optimum moisture content. ▶ Moisture should be maintained in fill prior to placing new fill or at the subgrade surfaces or additional processing may be required. ▶ Imported fill material should be predominately granular and non-expansive. ▶ The on-site inert demolition debris when crushed to the consistency of aggregate base may be reused in the compacted fills provided approval is provided by the reviewing regulatory agency and the owner. ▶ A representative of the Geotechnical Engineer should observe excavations, subgrade preparation, and fill placement activities.	**Implementation:** Project proponent **Monitoring and Reporting:** Project proponent **Verification:** District	During project design and construction

Mitigation Measure(s)	Responsible Party	Mitigation Timing
▶ Sufficient in-place field density tests should be performed during fill placement and in-place compaction to evaluate the overall compaction of the soils. ▶ Soils that do not meet minimum compaction requirements should be reworked and tested prior to placement of any additional fill. **Pile Foundations** ▶ Piles will be required to support the building either for the foundations supporting the roof deck extension and if the retrofit of the existing foundations as part of the building renovation indicate that additional axial support is required at selected columns except along the east wall. ▶ The pile foundations will mitigate against the potentially liquefiable soils at the site. ▶ Additional piles, if required, are recommended to be extended into the dense to very dense sandstone. ▶ Foundation contractor should be prepared for a range of drilling conditions, including shallow groundwater and caving soils. ▶ A representative of the Geotechnical Engineer should continuously observe the installation of the piles at the site. ▶ The final pile design for additional piles to retrofit the existing foundations should be reviewed by the Geotechnical Engineer. **Shallow Foundations** ▶ Minor structures not attached to the existing building such as site walls, small retaining walls, and trash enclosures with relatively light structural loads may be supported on shallow footings. ▶ Continuous footings or isolated column footings for structures should be supported on engineered fill or competent formational material. ▶ Soil resistance to lateral loads may use a combination of frictional resistance between the bottom of footings and underlying soils or aggregate base material and by passive soil pressures acting against the embedded sides of the footings without a reduction. ▶ A representative of the Geotechnical Engineer should observe and approve all footing excavations prior to placement of concrete and steel. ▶ Foundation concrete should conform to the requirements for negligible sulfate exposure for soil (Category S0) as outlined in ACI 318, Section 4.3. **Floor Slabs** ▶ Repairs to the existing slab-on-grade floors, if required, should be supported on properly compacted, sandy non-expansive soils. ▶ A structurally reinforced floor slab will be required if the risk of liquefaction settlement to cause distress to the existing slab-on-grade floor in the center and eastern portion of the building is not acceptable. ▶ A moisture vapor retarder should be placed under slabs that are to be covered with moisture-sensitive floor coverings (wood, vinyl, tile, etc.). **Retaining Walls** ▶ Non-expansive, imported or on-site, granular soils is recommended to be used as wall backfill. ▶ Active earth pressures can be used for designing walls that can yield at least 1 inch laterally in 10 feet of wall height under the imposed loads. ▶ At-rest pressures should be used for restrained walls that remain rigid enough to be essentially non-yielding.		

Mitigation Measure(s)	Responsible Party	Mitigation Timing
▶ An additional lateral earth pressure should be added to the above active pressures for walls greater than 6 feet high to account for seismic loads. ▶ Walls subject to surcharge loads should be designed for an additional uniform lateral pressure based on the anticipated surcharge pressure. ▶ Wall backfill should be well-drained to relieve possible hydrostatic pressure or designed to withstand these pressures. Storm Water Infiltration and Drainage ▶ Surface infiltration of storm water is not recommended at the site since the soils above the hard silts and clays consist of existing fills and potentially liquefiable soils. ▶ Positive surface gradients should be provided adjacent to structures so as to direct surface water run-off and roof drainage away from foundations and slabs ▶ Long-term ponding of surface water should not be allowed on pavements or adjacent to buildings. Flatwork and Pavements ▶ Exterior concrete and masonry flatwork should be supported on non-expansive, compacted fill. ▶ The use of the clayey soils within 2 feet of the flatwork subgrade should not be permitted unless differential heave is tolerable. ▶ Modifications of the parking lot may be consist of a pavement section of asphalt concrete over of aggregate base or portland cement concrete (PCC) over compacted subgrade. ▶ Aggregate base should conform to the requirements of California Department of Transportation Standard Specifications or the Standard Specifications for Public Works Construction (Green Book) for untreated base materials. ▶ The design of paved areas should incorporate measures to prevent moisture build-up within the base course which can otherwise lead to premature pavement failure.		

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2 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

STAY OPEN San Diego, LLC (STAY OPEN), as the Project proponent, proposes to develop the southern half of the existing San Diego Unified Port District (District) Annex Building (Annex Building) and part of the adjacent parking lot located at 3125 Pacific Highway, San Diego, CA into the STAY OPEN branded, shared accommodations hotel (Project). The Project includes a two-story, approximately 31,000 square foot hotel and approximately 49,000 square foot landscaped parking area that would include the following components:

- Lower cost overnight accommodations in the form of PODs (individual, securable sleeping compartments with beds within shared rooms) and shared bathroom facilities.
- Private rooms with and without bathrooms.
- A lobby indoor/outdoor bar and café with tables and benches.
- A rooftop restaurant and bar with tables and benches.
- Parking stalls for hotel and restaurant guests, overnight campervan rentals, and designated parking for shared transportation vehicles including scooters and bicycles.

These and other components of construction and operation of the Project are described in more detail in this chapter. The project also includes a Port Master Plan Amendment (PMPA) to allow for the commercial use, including accommodations, restaurant, and associated amenities, on the Project site. The PMPA is discussed later in this chapter, as well as Project background and need, Project site and location, Project objectives, and potential permits and approvals required for the Project.

2.2 PROJECT BACKGROUND AND NEED

The Board of Port Commissioners' (BPC) BPC Policy No. 775 establishes the goal of providing "lower cost visitor and recreational facilities to enhance the public's enjoyment of the San Diego Bay" (San Diego Unified Port District 2016). In addition, the District holds funds available for the provision of lower cost overnight accommodations on District tidelands in the City of San Diego. Most of these funds were secured through the Lane Field Hotels Development mitigation fees [for lower cost overnight accommodations] per the Lane Field Hotels Coastal Development Permit (CDP) and associated 2014 Memorandum of Agreement (MOA) between the District and the California Coastal Commission. Since the time BPC Policy No. 775 was approved, District staff completed an inventory of lower cost visitor and recreational facilities located within the District. Through the inventory, the District determined that a lower cost overnight visitor accommodations facility could be established in the Airport Related Commercial Subarea of Planning District 2.

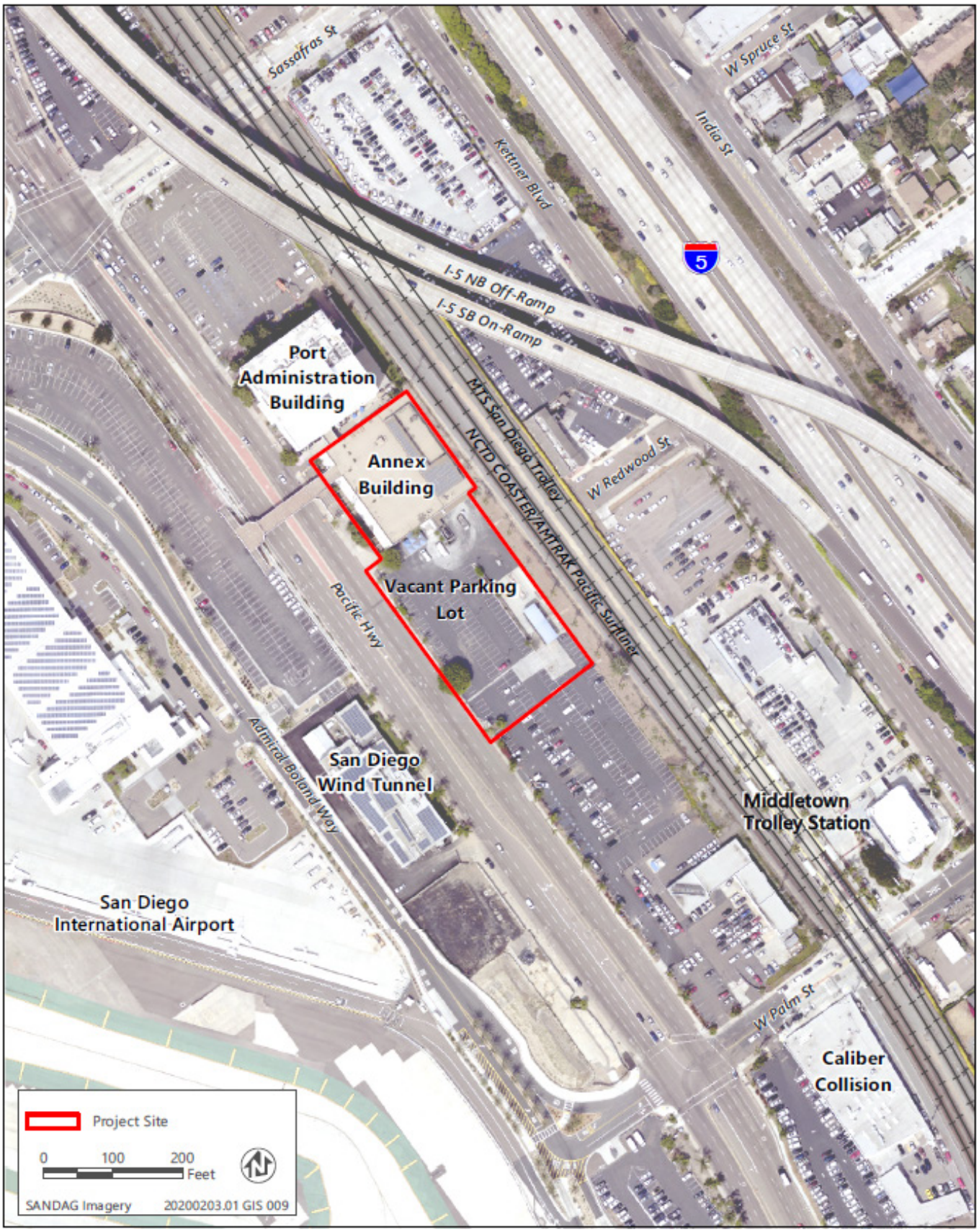
District staff issued a Request for Proposals for the development and operation of lower cost accommodations on January 22, 2019, and the BPC selected STAY OPEN's development proposal at its May 4, 2019 meeting. Following a due diligence period, the BPC directed District staff in August 2020 to further study the Project and commence the necessary review under the California Environmental Quality Act (CEQA).

2.3 PROJECT SITE AND LOCATION

The Project site is located on Pacific Highway south of the District Administration Building in the City of San Diego. The regional location is shown on Figure 2-1 (Regional Location). The Project location is shown on Figure 2-2.

Source: Adapted by Ascent Environmental in 2021

Figure 2-1 Regional Location



Source: Adapted by Ascent Environmental in 2021

Figure 2-2 Project Location

The Project site is located within Planning Subarea 29 (Airport Related Commercial) in Planning District 2 (Harbor Island/Lindbergh Field) of the certified Port Master Plan (San Diego Unified Port District 2020). Planning Subarea 29 contains the District Administration Building, the District's Annex Building, and some airport related commercial uses, including car rental offices, private general aviation services, airport parking, and service stations.

Located northwest of Downtown San Diego and north of San Diego Bay, the Project site is situated within an urbanized, developed area at the hub of multiple transportation modes. The Middletown Station on the MTS Trolley Green Line is approximately 200 feet southeast from the nearest portion of the Project site. San Diego International Airport (SDIA) is located immediately west of the Project site across Pacific Highway. A consolidated car rental facility at SDIA is approximately 500 feet northwest of the Project site, while SDIA passenger terminals are located approximately 1 mile west of the Project site. The cruise terminal is approximately 1 mile south of the Project.

Airport-related commercial and industrial land uses are located in the immediate Project vicinity. Airport-related commercial uses located west of the Project site across Pacific Highway include the San Diego Wind Tunnel, a former aerospace testing center, and Signature Flight Support, an operation center providing support services for business and private aviation. The nearest residential development is located approximately 700 feet to the east, and separated from the Project site by California Street, India Street, Interstate 5 (I-5), elevated freeway connector ramps, Kettner Boulevard, surface parking, two light rail trolley lines and two Burlington Northern Santa Fe Corp (BNSF)/passenger rail lines.

Railroad right-of-way consisting of four rail lines that serve the Metropolitan Transit System (MTS) San Diego Trolley, AMTRAK Pacific Surfliner intercity passenger rail, North County Transit District (NCTD) COASTER commuter rail, and freight rail service is located immediately to the east and separated from the Project site by a small embankment. Immediately south of the Project site is a vacant paved surface parking lot and single-story building formerly used as airport parking and to operate an airport shuttle service. I-5 is located approximately 400 feet to the east. Above grade on- and off-ramps connecting Pacific Highway to I-5 are located approximately 150 feet from the Project site at their nearest point.

The Project site is approximately 1.8 acres and currently consists of (1) an office building (Annex Building), (2) an approximately 47,000 square foot portion of an existing vacant parking lot immediately south of the Annex Building, and (3) an exterior pervious area between Pacific Highway and the Annex Building. A portion of the remainder of the existing parking lot not within the project site is proposed for use as the Project's temporary construction staging area that is approximately 0.4-acre.

The Annex Building rooftop includes a direct, above grade pedestrian connection to the District Administration Building and a direct above grade pedestrian bridge connection over Pacific Highway to a secure, gated, surface parking lot (currently used only for District employee parking) on the west side of Pacific Highway. The interior floor area of the Annex Building totals approximately 25,000 square feet and is comprised of approximately 11,000 square feet of vacant space (generally the southern half of the Annex Building) and approximately 14,000 square feet of office space used by District employees. However, due to the COVID-19 pandemic, the office space has been primarily vacant since March 2020. The remaining vacant space within the Annex Building was last occupied in January 2017 by Budget Rent a Car System, Inc. (Budget Car Rental) under a Tideland Use and Occupancy Permit (TUOP) with the District.

The Project's parking lot contains 85 parking stalls and was last used as an airport parking lot and shuttle service by Park n' Fly until June 2020 when they terminated the TUOP with the District. Impervious surfaces comprise approximately 72,000 square feet of the Project site, which includes the Annex Building's footprint (approximately 25,000 square feet) and paved parking lot (approximately 47,000 square feet). The remaining approximately 4,000 square feet of the Project site consists of the exterior area between the Annex Building and Pacific Highway; this area consists of approximately 2,000 square feet of pervious area and approximately 2,000 square feet of impervious (paved) area. The Port Administration Building is located directly north of the Annex Building. The elevation of the Project site is approximately 11 feet above mean sea level (AMSL). The area identified as the Project's temporary construction staging area is a vacant parking lot that has been unused since "Park N' Fly" terminated their TUOP for the use of the site in June 2020.

2.4 PROJECT OBJECTIVES

The objectives of the Project are to:

- Establish lower cost overnight accommodations located on District tidelands in the City of San Diego.
- Expand lower cost coastal access to District tidelands to ensure that all Californians and visitors from a variety of backgrounds and incomes are able to enjoy the area's full range of coastal experience.
- Implement the goal of BPC Policy No. 775 by providing "lower cost visitor and recreational facilities to enhance the public's enjoyment of the San Diego Bay."
- Renovate an unused and vacant portion of a District facility (Annex Building) to create lower cost overnight accommodations.
- Expand accommodations in an area well-served by existing public and private transportation options.

2.5 PROJECT COMPONENTS

This section describes the Project components, which include: renovation of an unused and vacant portion of the Annex Building into a shared accommodations hotel; site access and parking; lighting and signage; landscaping and water quality design features; Project construction; and Project operation. The proposed site plan, floor plans, roof plan, and plan for access, parking, landscaping, and storm water treatment are shown on Figures 2-3 through 2-7.

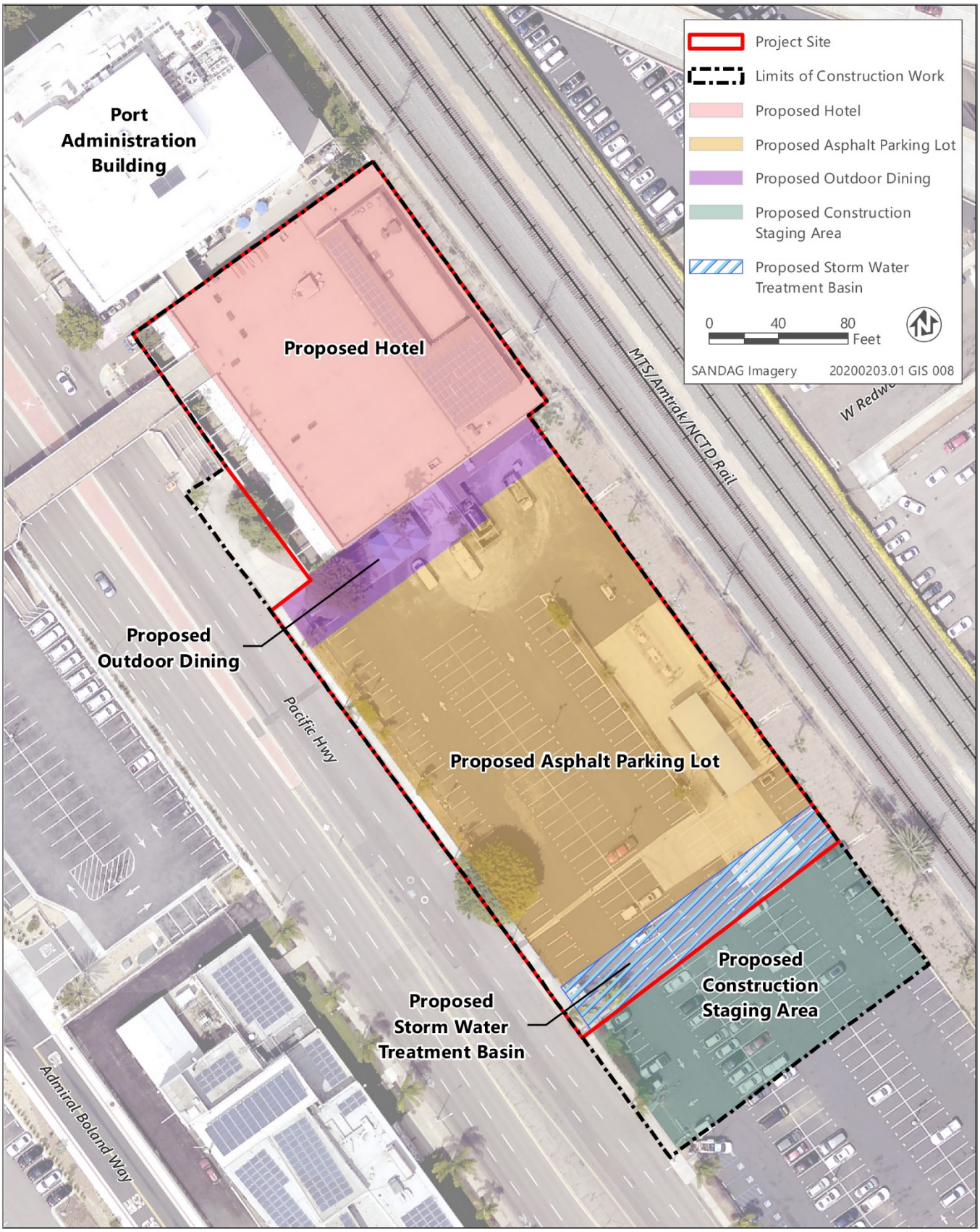
2.5.1 Shared Accommodations Hotel

The Project would reuse the vacant space in and rooftop of the existing Annex Building to develop a shared accommodations hotel. A second story would be added to the rooftop of the Annex Building and the existing roof would be extended on the west and south sides to increase the building area. The District's existing office space within the Annex Building would not be included in the Project. The existing solar panels on the Annex Building rooftop would be relocated onto the new second story of the Annex Building.

The maximum building height would not be more than 50 feet above the current top of the floor slab of the Annex Building accommodating the elevator penthouse and approximately 10-foot elevator cars. The Federal Aviation Administration (FAA) has reviewed the proposed maximum building height and issued a determination of no hazard to air navigation (FAA 2021). Table 2-1 lists improvements that would be made to the existing Annex Building.

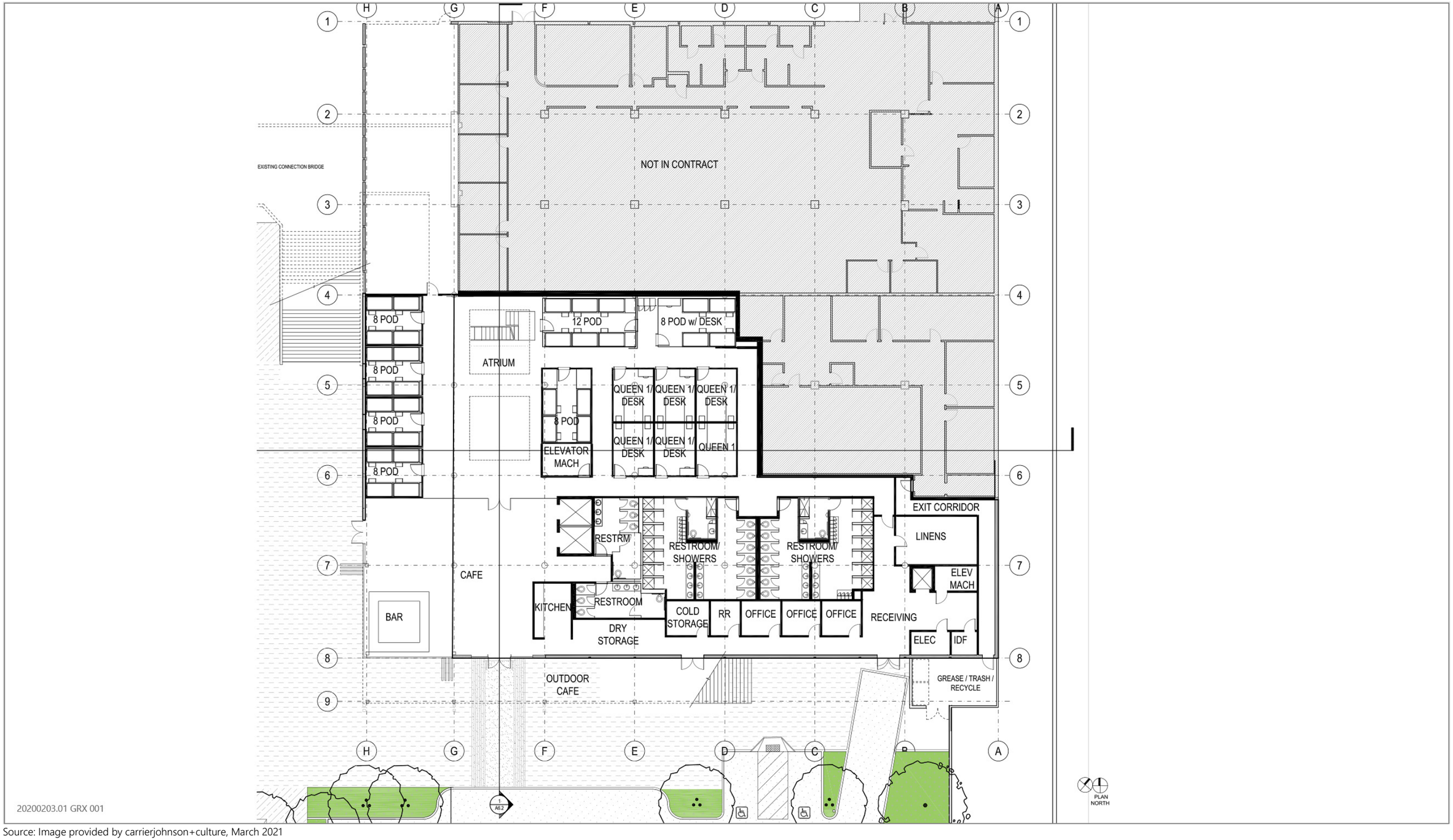
Table 2-1 Proposed Reuse of the Existing Annex Building

Project Component	Existing	Proposed	Change	Notes
Annex Building footprint	25,000 sq. ft.	25,000 sq. ft.	0 sq. ft.	No change as adaptive reuse of existing Annex Building
Building floor area	10,923 sq. ft.	31,000 sq. ft.	+20,077 sq. ft.	Addition of one floor above the existing one-story concrete structure and extension of the roof to the west and south.
Building height	18 ft	50 feet	+32 ft	Addition of a second story on the existing Annex Building
Number of floors	1	2	+1	Addition of a second story on the existing Annex Building



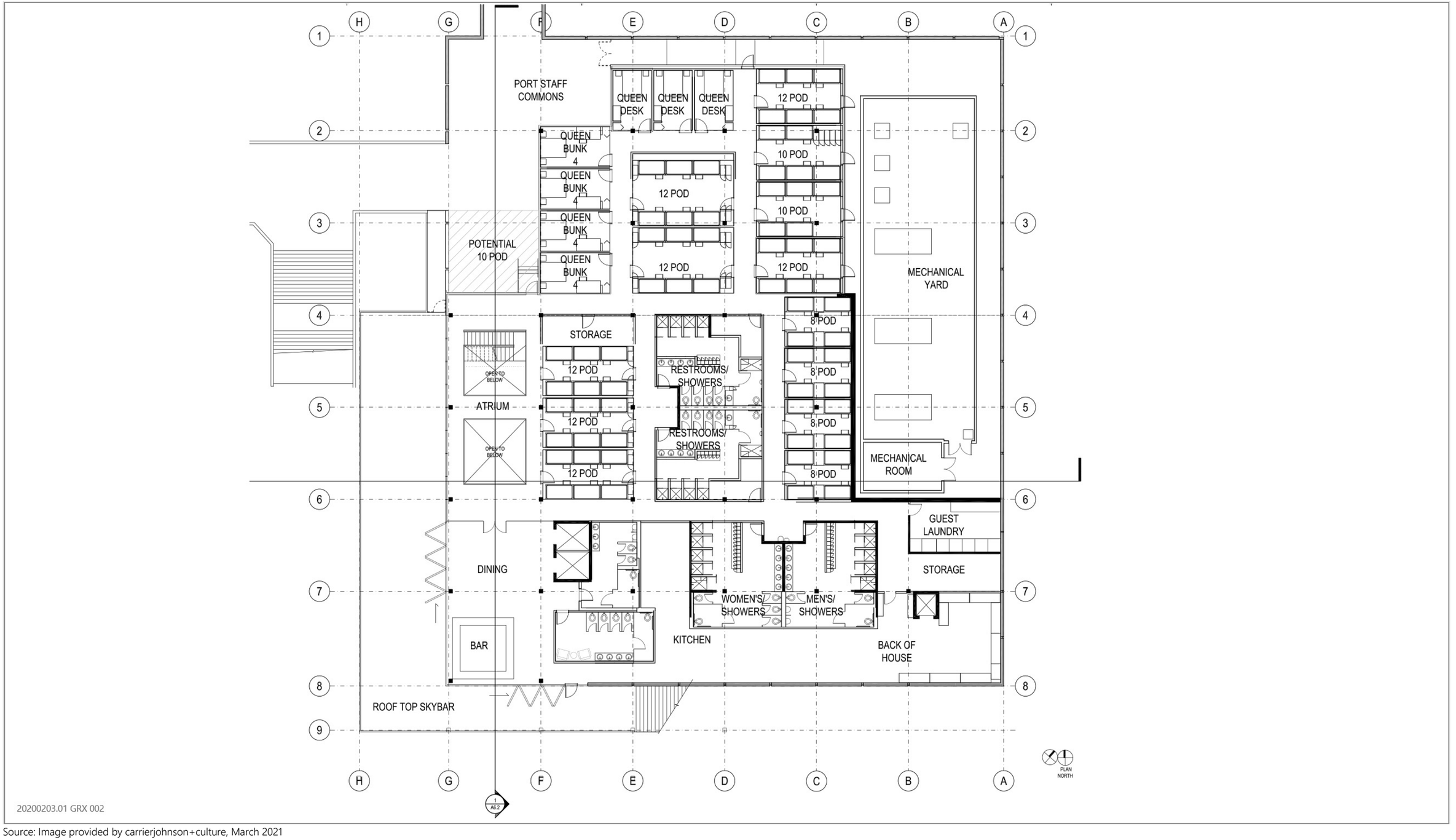
Source: Adapted by Ascent Environmental in 2021

Figure 2-3 Project Site Plan



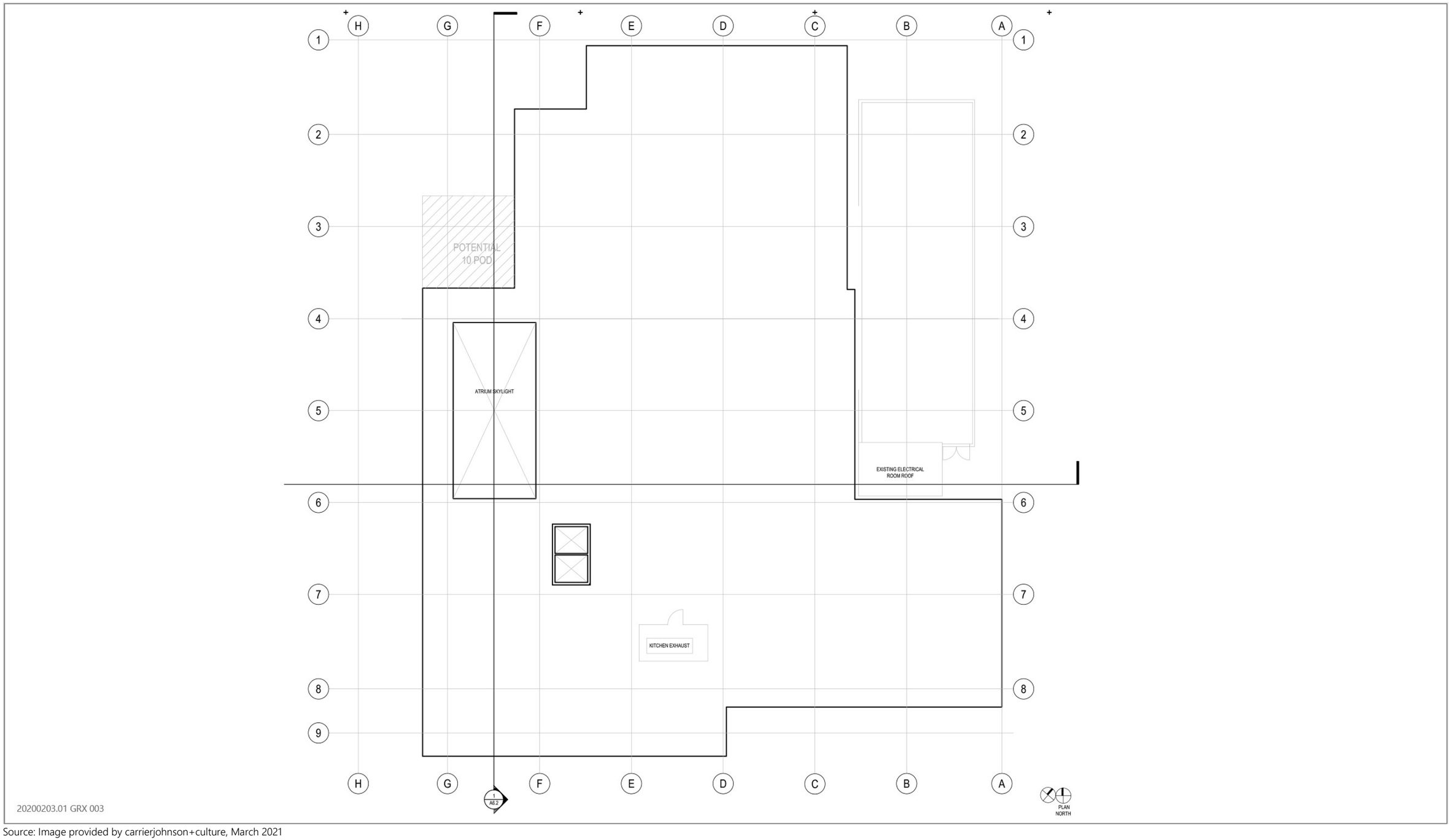
Source: Image provided by carrierjohnson+culture, March 2021

Figure 2-4 Floor Plan, Level 1



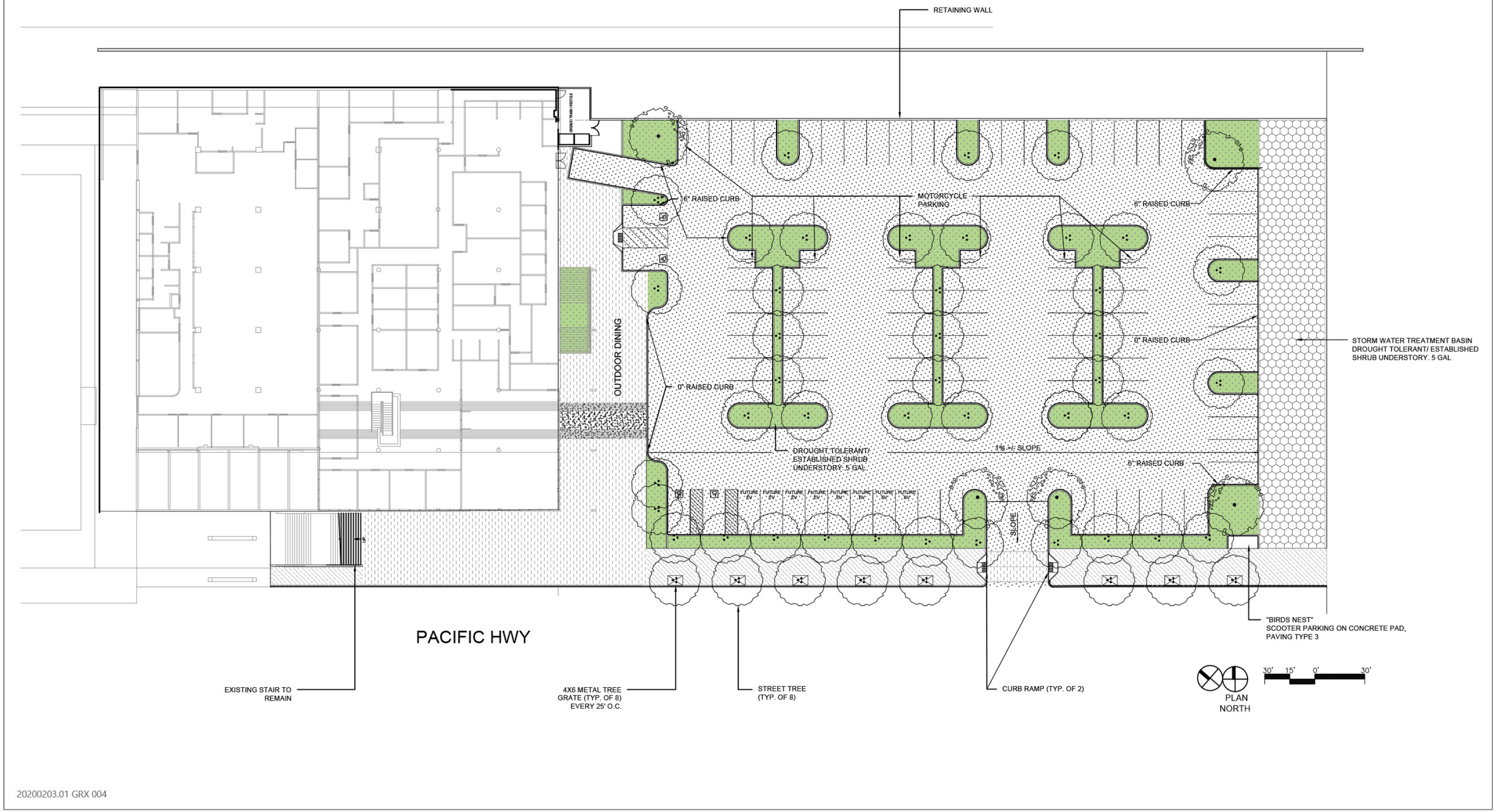
Source: Image provided by carrierjohnson+culture, March 2021

Figure 2-5 Floor Plan, Level 2



Source: Image provided by carrierjohnson+culture, March 2021

Figure 2-6 Roof Plan



Source: Image provided by carrierjohnson+culture, March 2021

Figure 2-7 Access, Parking, Landscaping, and Storm Water Treatment

The hotel would offer a variety of accommodation types on both the first and second floors, including shared rooms with PODs, shared bathrooms, and private rooms with and without bathrooms. PODs are individual sleeping compartments within a room and include a securable bed with storage. The POD rooms would contain between 8 to 12 PODs to allow for an increased number of occupants in a shared room with private sleeping enabled through the PODs. The proposed hotel would hold a maximum of 294 overnight guests. Refer to Table 2-2 for a list of accommodation types.

Table 2-2 Proposed Hotel Accommodation Types

Accommodation Type	Quantity	Number of Guests per Accommodation Type	Total Number of Guests
POD	226 beds	1/bed	226
Private room	17 rooms	Up to 4/room	68
Total			**294**

Common areas would include an atrium, lobby indoor/outdoor bar and café, and rooftop restaurant and bar open to the public during hours of operation for the restaurant, bar and café. On-site parking would be available for both hotel and restaurant guests as well as overnight parking for campervan rentals. The restaurant areas (lobby indoor/outdoor bar and café and rooftop restaurant and bar) would serve hotel guests and the general public. Both restaurant areas would provide indoor and outdoor seating and space for private parties and public events featuring music. Two elevators, a new exterior staircase, and the existing staircase abutting Pacific Highway would provide access to the rooftop restaurant and bar and an outdoor dining area facing Pacific Highway. Refer to Table 2-3 for a list of common areas and the maximum capacity per area.

Table 2-3 Common Area Capacities

Common Area	Number of Guests/Visitors/Employees
Maximum seating for the lobby indoor/outdoor bar and café (level 1)	286[a]
Maximum seating for the rooftop restaurant and bar (level 2)	179[a]

Notes: a. Assumes service is oriented to hotel guests and the general public during business hours of the restaurant, bar and cafe.

Source: STAY OPEN San Diego, LLC, November 2020.

HOTEL BUILDING MATERIALS AND DESIGN

Building materials for the north, west, and south elevations are shown in Figures 2-8 and 2-9 and would consist of concrete, steel, and glass. All hardscaping, roofing, and deck materials would be constructed using light-colored and reflective material to reduce heat buildup in the building and reduce the heat island effect. Santa Barbara thru-color finish stucco would be painted on the exterior to match the existing concrete exterior of the Annex Building. The atrium skylight and all windows would be made from clear, low-e, low-reflectance glass in an aluminum storefront system painted to match the structural steel of the building. The vertical aluminum fins shown on the west elevation would be painted dark brown to match the metal used on the windows and atrium.

2.5.2 Access and Parking

Vehicles would access the Project site from Pacific Highway. The Project would provide 85 vehicle parking spaces and 6 motorcycle parking stalls as described in Table 2-4. Seven electric vehicle (EV) parking stalls would be outfitted with EV charging infrastructure. Short-term parking (e.g., up to 3 hours) would be available to restaurant patrons. Overnight parking would be available for hotel guests. A ride share loading zone would be located directly in front of the hotel entrance and adjacent to the level 1 outdoor dining area, allowing guests ease of access to ridesharing options such as Uber and Lyft (Figure 2-7).

Table 2-4 Vehicle and Motorcycle Parking

Parking Stall Type	Quantity
Standard	64
ADA-compliant	5 [a]
Electric Vehicle	7 [b]
Campervan	9
Vehicle Parking Total	**85**
Motorcycle	6

[a] Total includes 1 ADA-compliant electric vehicle space.

[b] Total does not include the 1 ADA-compliant electric vehicle space, which is included in the "ADA-compliant" category.

Source: STAY OPEN San Diego, LLC, November 2020.

The Project would include designated areas for shared transportation services, including scooters and bicycles (Table 2-5). A total of 10 outdoor bicycle lockers would be provided for use by guests and visitors.

Table 2-5 Designated Space for Shared Transportation Services

Shared Transportation Type	Designated Area (square feet)	Quantity Accommodated
Scooters	140	20
Bicycles	Up to 200	20
Total	**Up to 340**	**40**

Source: STAY OPEN San Diego, LLC, November 2020

2.5.3 Lighting and Signage

The District utilizes the City of San Diego outdoor lighting ordinance (City of San Diego Ordinance Number 20186) to regulate outdoor lighting of development on District tidelands. Consistent with the ordinance, the Project would use downlights and 180-degree cutoff fixtures throughout the Project site and the parking lot would be illuminated for security purposes and consistent with City of San Diego Outdoor Lighting Regulations (City of San Diego Municipal Code Section 142.0740).

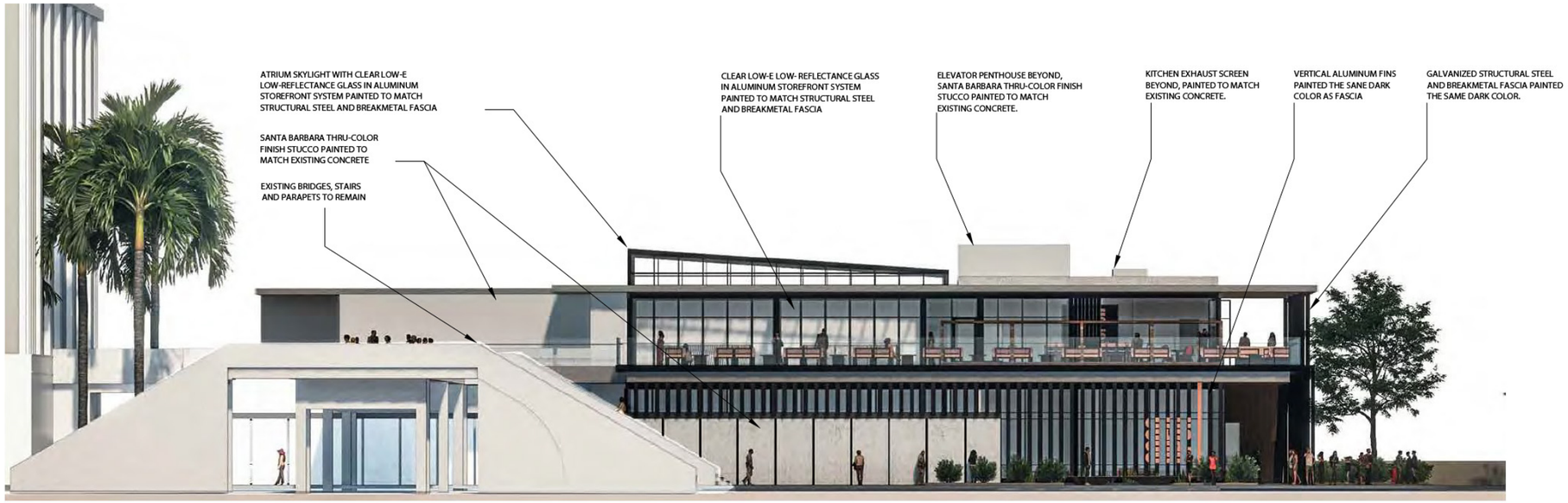
The following lighting management controls would be integrated into Project operation:

- Energy-saving automatic lighting management controls;
- A daylight-harvesting system that senses the amount of incoming daylight and reduces the electrical lighting;
- Occupancy sensors in offices to turn off lights in unoccupied spaces;
- Individual light-dimming controls;
- LED lighting for signage and illuminated features; and
- High efficiency, shielded lighting for all nighttime lighting fixtures.

The STAY OPEN hotel would be identified by two backlit illuminated signs displaying the STAY OPEN logo on the Pacific Highway frontage (west side) and south side of the building and would comply with the District's Tenant Signage Guidelines. Additional STAY OPEN signage would be installed on the Project site, including a large painted "STAY OPEN" sign painted onto the roof for approaching airplane visibility. The painted roof sign would be positioned to allow for use of the existing photovoltaic (PV) panels and room for possible future PV panels. Large lettering spelling "OPEN" would be painted on the vertical fins located on the west side of the building as shown in Figure 2-8.

NORTH ELEVATION

NOT TO SCALE



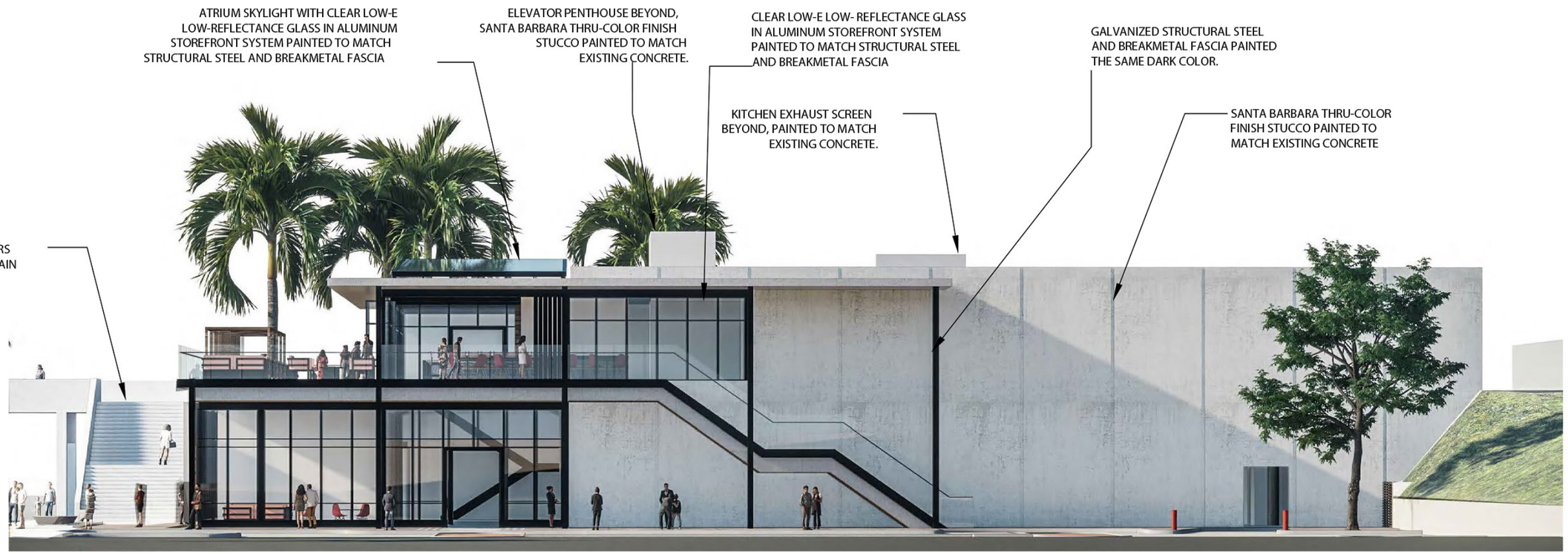
WEST ELEVATION

NOT TO SCALE

20200203.01 GRX 005

Source: Image provided by carrierjohnson+culture, January 2020

Figure 2-8 North and West Building Elevations



SOUTH ELEVATION

NOT TO SCALE

20200203.01 GRX 006

Source: Image provided by carrierjohnson+culture, January 2020

Figure 2-9 South Building Elevation

2.5.4 Landscaping and Water Quality Design Features

The Project would include approximately 11,000 square feet of landscaped and pervious surface area in the parking lot that would consist of drought tolerant plant species and shade trees (6,000 square feet) and a storm water treatment basin (5,000 square feet). The drought tolerant plant species would be watered with a drip system that conserves water by preventing irrigation during and after rain events. The approximately 5,000 square foot storm water treatment basin would be constructed at the southern end of the proposed parking lot and would include a depressed surface area approximately 12 inches deep that would retain storm water above grade. Storm water would pass through approximately 30 inches of amended soil, a 24-inch gravel layer, and a perforated pipe that would discharge the treated water into the existing storm water system. Plant species able to tolerate saturated soil conditions would be planted in the storm water treatment basin.

2.5.5 Project Construction

Construction of the Project is expected to begin in June 2023 and end in August 2024 for a total duration of approximately 15 months. Construction activities would be limited from 7 a.m. to 7 p.m. Monday through Saturday, except for legal holidays (not including Columbus Day or Washington's Birthday) as specified in Chapter 5, Section 59.5.0404 of the San Diego Municipal Code.

Construction would be performed in one continuous construction phase consisting of six stages: demolition, grading, site preparation for building construction, building construction, architectural coating, and paving. Table 2-6 provides a summary of Project construction, including estimates for equipment to be used, duration, and the average number of construction workers and associated worker trips to the site during each construction stage.

Table 2-6 Construction Equipment

Construction Stage	Equipment (Amount)	Duration (days)	Construction Workers/Vehicles (average per day)
Demolition	Concrete Cutter/Individual Saw (1) Excavators (3) Rubber tired dozers (2) Haul trucks (1)	48	10/10
Grading	Excavator (1) Scraper (1) Grader (1) Tractor/Loader/Backhoes (3) Rubber tired dozer (1) Dump trucks (10) Haul trucks (4)	10	5/5
Site Preparation for Building Construction	Tractor/Loader/Backhoes (4) Micro-pile driver (1) Rubber tired dozers (3)	40	5/5
Building Construction	Crane (1) Forklifts (3) Generator set (1) Tractor/Loader/Backhoes (3) Welders (9) Haul truck (1)	212	50/50
Architectural Coating	Crane (1) Air compressor (1)	23	10/10
Paving	Pavers (2) Paving equipment (2) Rollers (2) Haul trucks (2)	5	4/4

As shown in Table 2-6, the average numbers of construction employees on-site would vary during the different stages of construction. To account for potential periods of construction stage overlap during the building construction stage, Project construction could require up to 65 construction workers on-site at one time. Workers would park in the parking lot adjacent to the staging area where up to 100 construction-related parking spaces would be available.

Demolition and construction activities would involve the removal of up to 835 tons of demolition debris, site preparation activities, and installation of up to 15 supporting micropiles on the interior and exterior of the Annex Building.

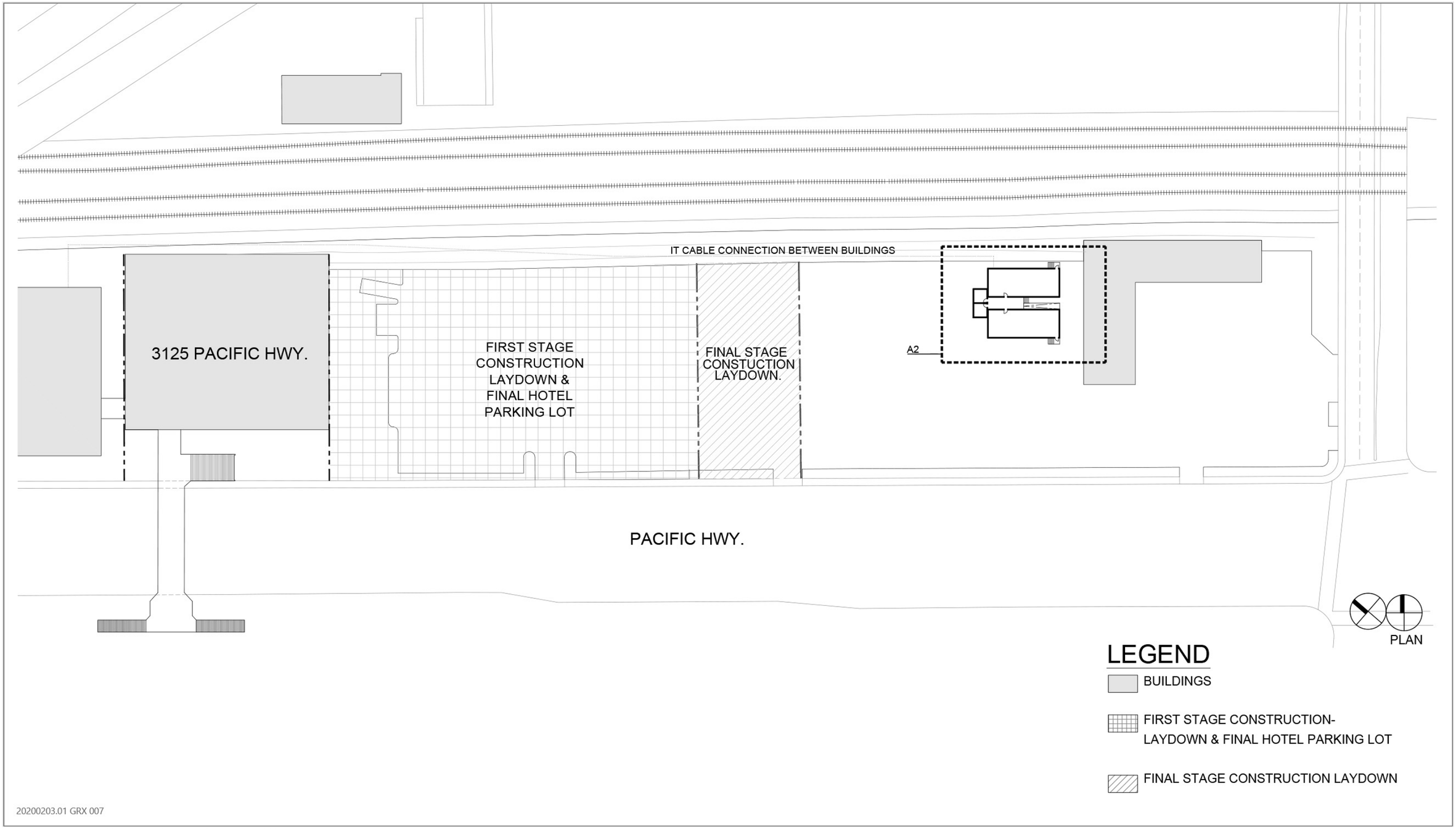
The District employees that work in the northern half of the Annex Building would continue to park their vehicles in an off-site District employee parking lot. Temporary office trailers for existing employees would be placed onto the parking lot south of the Project site during construction as shown on Figure 2-10. After completion of the structural improvements, District employees would return to the office space of the Annex Building and the office trailers would be removed from the site.

Demolition and construction work would occur primarily within the vacant portion of the Annex Building and on the building rooftop. Existing walls, decking, and foundation would be demolished, and micro piledriving would occur along the exterior of the structure. A minimum of 75 percent of demolition and construction waste would be diverted from landfills, consistent with the City of San Diego (San Diego Municipal Code § 66.0606(d)(3)). Disposal sites would include Rock Ridge Crushing for concrete and asphalt, Pacific Resource Recovery for vegetation, and Sanco Recycling for wood and metal. Concrete topping along the rooftop would occur to reinforce the deck. This, along with other steel columns and hold downs for the second story would require extensive work on the deck.

In addition to demolition and structural improvements, coring would occur to accommodate new mechanical, electrical, and plumbing (MEP) work. The coring would occur after demolition and structural improvements. Architectural coating and painting would be required for all interior and exterior areas except for the wood and aluminum elements on the existing building.

Earthwork would consist of up to 47,000 square feet of grading to accommodate parking spaces, drive aisles, curb and gutters, ribbon cutters, and landscaping. Up to 6,000 square feet of excavation would be required for the storm water treatment basin as well as utilities. Construction activity would include trenching throughout the Project site for domestic and irrigation water lines, sewer lines, and dry utilities, including electrical, gas, cable, and phone lines. There would be up to 400 feet of trenching, approximately 2 feet deep, and excavation would reach depths of up to 10 feet. It is anticipated that up to 400 cubic yards of fill would be needed for backfilling.

Before construction activities, STAY OPEN would obtain the necessary construction-related traffic control permit from the City of San Diego to address encroachment into the public right-of-way from planned construction activities. The Project would be required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). The Construction General Permit would require the development of a storm water pollution prevention plan (SWPPP) by a certified Qualified SWPPP Developer. Construction cranes used during construction would require a determination of no hazard to air navigation provided by the FAA.



Source: Image provided by carrierjohnson+culture, March 2021

Figure 2-10 Construction Site Plan

2.5.6 Project Operation

The Project would operate a STAY OPEN branded, shared accommodations hotel with multiple dining options available to guests and the public. The hotel would provide accommodations for up to 294 overnight guests with a variety of lower cost accommodation types including PODs and private rooms (Table 2-3). The lobby indoor/outdoor bar and café and rooftop restaurant and bar would provide a total of 465 seats for guests and visitors. A maximum daily total of 25 employees would be needed to operate the proposed hotel. The maximum number of daily guests and visitors is anticipated to be 1,000.

The Project would promote the use of alternate forms of transportation by providing an interactive kiosk and a STAY OPEN smart phone application that would inform guests and visitors about available public transportation and shared transportation services in the area. On occasion, the Project would accommodate events for guests and the public such as private parties, beverage tastings, and workout classes.

OPERATING EQUIPMENT

The Project would require operating equipment such as use of a Variable Refrigerant Flow system for HVAC including rooftop condensers and a rooftop hot water boiler. This equipment would be architecturally screened from view and painted to match the existing concrete. Multiple central outdoor units would be installed on the second floor of the Annex Building in the mechanical yard area (the proposed location of mechanical yard is shown on Figure 2-5). The system would incorporate a multiple exhaust and make up air systems (MAS) for proper ventilation within the hotel. All food related facilities would be designed with a commercial kitchen package to include exhaust and MAS systems.

UTILITIES

The Project would connect with existing on-site infrastructure for the following utilities:

- Water supply (City of San Diego)
- Wastewater (City of San Diego)
- Electricity and Natural Gas (San Diego Gas & Electric)
- Storm water (City of San Diego and District)

On-site storm water treatment is described in Section 2.6.5, above. All on-site utilities would be installed underground except for transformer boxes and cabinet facilities.

2.6 PORT MASTER PLAN AMENDMENT

The Project includes a Port Master Plan Amendment (PMPA) to allow for accommodations and associated amenities, including a restaurant, on the Project site. More specifically, the PMPA would change the land use designation of the Project site from "Aviation Related Industrial" to "Commercial Recreation." In addition, the Project is considered "appealable" development under Section 30715 of the California Coastal Act (Coastal Act), and per Section 30711 of the Coastal Act, the PMPA will add this Project to the Port Master Plan's Project List for Planning District 2 (Harbor Island/Lindbergh Field). The draft PMPA is included as Appendix A to this IS/MND.

2.7 POTENTIAL PERMITS AND APPROVALS REQUIRED

The District is the primary approval authority for the Project. District discretionary approvals would include:

- Approval of a PMPA
- Concept approval of the Project
- Issuance of an appealable Coastal Development Permit (CDP)
- Approval of the plans
- Approval of real estate agreement between the District and STAY OPEN

Additional subsequent approvals and other permits that may be required from local, regional, state, and federal agencies include, but are not limited to:

- Certification of the PMPA by the California Coastal Commission,
- FAA notification and determination of and obstruction hazard,
- Airport Land Use Compatibility Plan Consistency Determination from the Airport Land Use Commission,
- San Diego Regional Water Quality Control Board – Stormwater Construction General Permit (including the development and implementation of a Storm Water Pollution Prevention Plan),
- City of San Diego Traffic Control Permit, and
- City of San Diego issuance of ministerial permits (e.g., grading, building, electrical).

3 ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

1. Project Title: STAY OPEN San Diego Hotel and PMPA
2. Lead Agency Name and Address: San Diego Unified Port District (District)
3. Contact Person: Anna Buzaitis, Program Manager, Planning Department
4. Project Location: 3125 Pacific Highway, San Diego, CA
5. Project Proponent/Applicant: Andrew Swerdloff, STAY OPEN, 11 Brooks Avenue, Unit B, Venice, CA 90291
6. Existing Port Master Plan Designation: Aviation Related Industrial
7. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

   STAY OPEN San Diego, LLC proposes to develop the southern half of the existing San Diego Unified Port District Annex Building and part of the adjacent parking lot located at 3125 Pacific Highway, San Diego, CA into the STAY OPEN branded hotel. The Project includes a two-story, approximately 31,000 square foot STAY OPEN hotel and approximately 49,000 square foot landscaped parking area.
8. Surrounding Land Uses and Setting:
   Located northwest of Downtown San Diego and San Diego Bay, the Project site is situated within an urbanized, developed area at the hub of multiple transportation modes. The Middletown Station on the Metropolitan Transit System (MTS) Trolley Green Line is approximately 200 feet southeast from the nearest portion of the Project site. The District's Administration Building is located immediately north of the Project site. San Diego International Airport (SDIA) is located immediately west of the Project site across Pacific Highway. A consolidated car rental facility at SDIA is approximately 500 feet northwest of the Project site, while SDIA passenger terminals are located approximately 1 mile west of the Project site.
9. Other public agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)
   The District is the primary approval authority for the Project. District discretionary approvals would include:
   - Approval of a Port Master Plan Amendment (PMPA)
   - Concept approval of the Project
   - Issuance of an appealable Coastal Development Permit (CDP)
   - Approval of the plans
   - Approval of real estate agreement between the District and STAY OPEN

   Additional subsequent approvals and other permits that may be required from local, regional, state, and federal agencies include, but are not limited to:
   - Certification of the PMPA by the California Coastal Commission,
   - FAA notification and Part 77 determination,
   - Airport Land Use Compatibility Plan Consistency Determination from the Airport Land Use Commission,
   - San Diego Regional Water Quality Control Board – Stormwater Construction General Permit (including the development and implementation of a Storm Water Pollution Prevention Plan),
   - City of San Diego Traffic Control Permit, and
   - City of San Diego issuance of ministerial permits (e.g., grading, building, electrical).

10. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

    Under Public Resources Code Section 21080.3.1, a lead agency shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe. No California Native American tribes have requested to be informed of proposed projects by the District; therefore, there is no trigger to begin consultation under AB 52, resulting in no resources identified as tribal cultural resources under Public Resources Code Section 21074.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Where checked below, the topic with a potentially significant impact will be addressed in an environmental impact report.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology / Soils	☐ Greenhouse Gas Emissions	☐ Hazards / Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☐ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance
	☐ None	☒ None with Mitigation Incorporated

DETERMINATION (To be completed by the Lead Agency)

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 in the project have been 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 a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, 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 EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Aug 10, 2021

Signature Date

Lesley Nishihira, Planning Director

San Diego Unified Port District

Agency

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 where 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 offsite as well as onsite, 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, then 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 EIR is required.
4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "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 (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other 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 they 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 Measures Incorporated," describe the mitigation measures which 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, where 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 less than significance.

3.1 AESTHETICS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. Aesthetics.				
Except as provided in Public Resources Code section 21099 (where aesthetic impacts shall not be considered significant for qualifying residential, mixed-use residential, and employment centers), 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 within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

3.1.1 Environmental Setting

The Project site is located northwest of Downtown San Diego and San Diego Bay within an urbanized and developed area at the convergence of multiple transportation modes. The aesthetic character of the Project site and the surrounding area is urban and industrial because of the surrounding airport-related commercial land uses and various forms of public transportation. Airport-related commercial land uses include car rental offices, private general aviation services, airport parking, and service stations. Transportation modes close to the Project site include the MTS Trolley Green Line, San Diego International Airport (SDIA), and Interstate 5 (I-5).

The Project site contains the existing Annex Building, an exterior (½ pervious and ½ impervious) area between Pacific Highway and the Annex Building, and a vacant parking lot. The existing Annex Building's exterior is composed of light-colored, low-reflective concrete panels, with windows situated in aluminum frames. Existing lighting on and surrounding the Project site consists of parking lights within the existing Annex Building parking lot, along with street lights on Pacific Highway. Immediately south of the Project site is a vacant paved surface parking lot and single-story building formerly used for airport parking. I-5 is located approximately 400 feet to the east. Above grade on- and off-ramps connecting Pacific Highway to I-5 are located approximately 150 feet from the Project site at their nearest point.

No scenic vista areas are on or directly adjacent to the Project site. The closest designated scenic vista area is on the San Diego Bay within the Harbor Island/Lindbergh Field Planning District of the Port Master Plan, approximately 1 mile to the southwest (District 2020a: Figure 9). No officially designated state scenic highways are adjacent to or close to the Project site. The portion of I-5 near the Project site is an eligible state scenic highway (Caltrans 2020).

3.1.2 Discussion

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

No impact. There are no scenic vista areas adjacent to the Project site, the closest designated scenic vista is approximately 1 mile southwest along the San Diego Bay in the Harbor Island/Lindbergh Field Planning District of the Port Master Plan, as designated in the PMP (District 2020a: Figure 9). This nearest scenic vista, as with the other designated vistas in the Harbor Island/Lindbergh Field Planning District and the PMP, are landside views looking across San Diego Bay. The Project is located northeast of Harbor Island/Lindbergh Field and does not lie within the viewshed of the respective vistas. Moreover, between this designated scenic vista and the Project site is SDIA along with various commercial and industrial buildings consistent with the airport-related commercial land use of the surrounding area.

The Project would redevelop the southern half of the existing Annex Building and a portion of the adjacent parking lot into a hotel. The new addition would be approximately 32 feet taller than the existing building with the construction of an additional floor above the existing one-story concrete structure and extension of the roof to the west and south. The re-developed portion of the Annex Building would not affect the views of the scenic vista area located along the San Diego Bay. Distance (approximately 1 mile), SDIA, and various commercial structures separate the Project site from the scenic vista area. Furthermore, the scenic vista area is a view of San Diego Bay, not inland in the direction the Project is located. Therefore, views associated with construction and operation of the Project would have **no impact** on designated scenic vistas. No mitigation is required.

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

Less-than-significant impact. One eligible state scenic highway, I-5, is located approximately 400 feet east of the Project site (Caltrans 2020). While the Project may be visible to motorists on I-5, its aesthetic character would be consistent with the surrounding urban and industrial land uses. The Project site is approximately 70 feet lower in elevation than I-5, which is located above the grade of the streets and properties located west of the freeway. The new hotel would be 50 feet tall, approximately 32 feet taller than the existing Annex Building. The increased height would introduce additional building facades in the views of motorists traveling along I-5. However, the existing District Administration Building directly adjacent to the Project site is seven stories and 111 feet tall, approximately twice as tall as the Project. The additional height and mass of the Project would not substantially increase the obstruction of views from I-5, and its aesthetic character would be similar to the surrounding commercial and industrial buildings that establish the aesthetic character of the area. Moreover, given the raised nature of the I-5, the additional height of the building would not obstruct views already limited, obstructed views of San Diego Bay. The Project would not damage any other scenic resources as there are no trees or rock outcrops on the Project site, and the existing Annex Building is not a designated historic building, as described in Section 3.5, Cultural Resources. The Project would not substantially damage scenic resources within a state scenic highway; therefore, impacts would be **less than significant**, and mitigation is not required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less-than-significant impact. The Project would redevelop the existing Annex Building into a hotel, and would include a Port Master Plan Amendment (PMPA) to change the land use designation from Aviation Related Industrial to Commercial Recreation to allow for the hotel use. This land use designation change would not affect regulations governing the scenic quality of the area because the existing land use designation allows for various forms of commercial and industrial use related to airport operations. Furthermore, the proposed design would be compatible with the existing Annex Building. Santa Barbara thru-color finish stucco would be painted on the exterior to match

the existing concrete exterior of the Annex Building and adjacent District Administration Building, and the atrium skylight and all windows would be within an aluminum storefront system painted to match the structural steel of the building. The Port Master Plan is the document that governs scenic quality at the Project site. As discussed above in Section 3.1.2(a), the closest designated scenic vista in the Port Master Plan is approximately 1 mile southwest along the San Diego Bay in the Harbor Island/Lindbergh Field Planning District. Given the distance (approximately 1 mile), SDIA, and various commercial structures that separate the Project site from the scenic vista area, the Project would not conflict with the Port Master Plan with respect to scenic quality. In addition, I-5, which is located approximately 400 feet east of the Project site, is an eligible state scenic highway (Caltrans 2020); however, as discussed above in Section 3.1.2(b), the Project would not substantially damage the scenic resources from the eligible state scenic highway. Therefore, the Project would have a **less-than-significant** impact on applicable zoning and other regulations governing scenic quality, and no mitigation is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less-than-significant impact. The Project building design features includes extensive use of nonreflective glass and brushed metal trim. The atrium skylight and all windows would be made from clear, low-e, low-reflectance glass in a brushed aluminum storefront system painted to match the structural steel of the building. The vertical aluminum fins shown on the west side of the building would be painted the same dark brown color to match the metal used on the windows and atrium. The hotel would be more open with the additional windows and atrium compared to the existing Annex Building, which would increase the relative light and glare during the day and night. All hardscaping, roofing, and decking would be constructed using light-colored and reflective material to reduce heat buildup in the building and the heat island effect. These materials would be composed of stucco and other similar materials that reduce heat but do not contribute to light glare.

As described in Section 2.5.3, Lighting and Signage, the hotel would be identified by two backlit illuminated signs displaying the STAY OPEN logo on the west and south side of the building that would comply with the District's Tenant Signage Guidelines. Illuminated signage would have a gentle illumination, or soft glow effect, and would not blink, flash, or direct bright light onto the surroundings and are not anticipated to have an adverse effect on surrounding aesthetics. Additionally, the existing Annex Building is surrounded by exterior lighting, including lighting from the existing parking lot and street lights along Pacific Highway. While the Project would increase the amount of illumination at the Project site compared to the existing building, which does not have illuminated signage, all exterior lighting would comply with applicable lighting code. The District utilizes the City of San Diego Outdoor Lighting Ordinance (City of San Diego Ordinance Number 20186) to regulate outdoor lighting of development on District tidelands. The City of San Diego Outdoor Lighting Ordinance requires outdoor lighting fixtures to be installed in a manner that minimizes light pollution (Ordinance Number 20186, Chapter 14, Section 142,0740 of San Diego Municipal Code). The Project would be consistent with this requirement, as it would not direct light outside the Project site or otherwise illuminate the surrounding uses. Downlights and 180-degree cutoff fixtures would be used throughout the Project site and the parking lot would be illuminated for security purposes.

Both interior and exterior lighting would be designed and operated to enhance the visual character of the building and site. The illuminated features of the Project are intended to accent the architecture of the building and provide a gentle illumination of exterior areas of the building, as well as provide wayfinding signage at key entry points. This illumination would not create a substantial source of light that would adversely affect the further surrounding area. Additionally, glass utilized in the building façade would be treated with an antireflective coating to reduce glare consistent with current Title 24 requirements. Therefore, the Project would not create a substantial light or glare that would adversely affect day- or nighttime views in the area, and impacts would be **less than significant**. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with aesthetic resources; thus, mitigation measures are not required.

3.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forest Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) 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 and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
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 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?	☐	☐	☐	☒

3.2.1 Environmental Setting

The Project site is located northwest of Downtown San Diego and San Diego Bay in an urbanized, developed area. The Project site is identified as urban and built-up land by the California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (DOC 2016, City of San Diego 2007). No agricultural land or operations are located on or adjacent to the Project site.

No portions of the Project site or adjacent parcels are held under Williamson Act contracts (DOC 2016; City of San Diego 2007: Figure 3.1-1). There are no areas either within or adjacent to the Project site that are zoned as forestland or timberland (County of San Diego 2016: 2.2-2).

3.2.2 Discussion

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 site is situated within an urbanized, developed area within the City of San Diego. The surrounding area consists of airport-related commercial and industrial land uses. According to the DOC's Farmland Mapping and Monitoring Program, the Project site is mapped as urban and built-up land and does not contain any agricultural land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2016). The Project would not convert Important Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. **No impact** would occur; mitigation is not required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No impact. No agricultural resources or operations exist within the Project limits or adjacent areas. The Project site is not zoned for agricultural use. No Williamson Act contracts apply to the Project site. Therefore, **no impact** would occur as the Project would not conflict with existing agricultural zoning or a Williamson Act contract. Mitigation is not required.

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. The Project site is not zoned for forestland, timberland, or zoned Timberland Protection. There is no timberland present on or adjacent to the Project site. Therefore, **no impact** to forest land or timberland would occur. Mitigation is not required.

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

No impact. No forest land or timberland resources exist on or adjacent to the Project site, which is in an urbanized portion of the City of San Diego. Therefore, **no impact** would occur. Mitigation is not required.

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. No agricultural, forestland, or timberland resources exist on or adjacent to the Project site. Therefore, **no impact** would occur. Mitigation is not required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with agricultural or forest resources; thus, mitigation measures are not required.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Environmental Setting

The project site is located in the San Diego Air Basin (SDAB), which encompasses all of San Diego County and is under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). The ambient concentrations of air pollutant emissions are determined by the amount of emissions released by the sources of air pollutants and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, atmospheric stability, and sunlight. Therefore, existing air quality and odor conditions in the area are determined by such natural factors as topography, meteorology, and climate, in addition to the amount of emissions released by existing air pollutant sources.

AMBIENT AIR QUALITY

Criteria Air Pollutants

The U.S. Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants, which are known to be harmful to human health and the environment. These pollutants are: carbon monoxide (CO), lead, nitrogen dioxide (NO_2), ozone, particulate matter with an aerodynamic diameter less than or equal to 10 microns in diameter (PM_{10}) and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in diameter ($PM_{2.5}$), and sulfur dioxide (SO_2). The State of California has also established California Ambient Air Quality Standards (CAAQS) for these six pollutants, as well as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. NAAQS and CAAQS were established to protect the public with a margin of safety, from adverse health impacts caused by exposure to air pollution. A brief description of the source and health effects of criteria air pollutants is provided below in Table 3.3-1.

Table 3.3-1 Sources and Health Effects of Criteria Air Pollutants

Pollutant	Sources	Acute[a] Health Effects	Chronic[b] Health Effects
Ozone	Secondary pollutant resulting from reaction of VOC and NO_X in presence of sunlight. VOC emissions result from incomplete combustion and evaporation of chemical solvents and fuels; NO_X results from the combustion of fuels	Increased respiration and pulmonary resistance; cough, pain, shortness of breath, lung inflammation	Permeability of respiratory epithelia, possibility of permanent lung impairment
Carbon monoxide (CO)	Incomplete combustion of fuels; motor vehicle exhaust	Reduced capacity to pump oxygenated blood; headache, dizziness, fatigue, nausea, vomiting, death	Permanent heart and brain damage
Nitrogen dioxide (NO_2)	Combustion devices (e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines), industrial processes, and fires	Coughing, difficulty breathing, vomiting, headache, eye irritation, chemical pneumonitis or pulmonary edema; aggravation of existing heart disease leading to death	Chronic bronchitis, emphysema, decreased lung function
Sulfur dioxide (SO_2)	Combustion devices (e.g., boilers, gas turbines, and mobile and stationary reciprocating internal combustion engines), industrial processes, and fires	Irritation of upper respiratory tract, increased asthma symptoms, aggravation of existing heart disease leading to death	Chronic bronchitis, emphysema
Respirable particulate matter (PM_{10}), Fine particulate matter ($PM_{2.5}$)	Fugitive dust, soot, smoke, mobile and stationary sources, construction, fires and natural windblown dust, and formation in the atmosphere by condensation and/or transformation of SO_2 and VOC	Breathing and respiratory symptoms, aggravation of existing respiratory and cardiovascular diseases, premature death	Alterations to the immune system, carcinogenesis
Lead	Metal processing, piston-engine aircraft or other vehicles operating on leaded fuel	Reproductive/developmental effects (fetuses and children)	Numerous effects including neurological, endocrine, and cardiovascular effects

Notes: NO_X = oxides of nitrogen; VOC = volatile organic compounds

[a] "Acute" refers to effects of short-term exposures to criteria air pollutants, usually at fairly high concentrations.

[b] "Chronic" refers to effects of long-term exposures to criteria air pollutants, usually at lower, ambient concentrations.

Source: EPA 2019

Attainment Area Designations

The federal Clean Air Act (CAA) and the California Clean Air Act (CCAA) require all areas of California to be classified as attainment, nonattainment, or unclassified with respect to the NAAQS and CAAQS. Under the CAA and the CCAA, both the California Air Resources Board (CARB) and EPA use ambient air quality monitoring data to designate the attainment status of an air basin relative to the CAAQS and NAAQS for each criteria air pollutant. The purpose of these designations is to identify those areas with air quality problems and thereby initiate planning efforts for improvement. The three basic designation categories are "nonattainment," "attainment," and "unclassified." "Unclassified" is used in an area that cannot be classified based on available information as meeting or not meeting the standards. The SDAB is currently classified as a Nonattainment Area with respect to the 1-hour ozone CAAQS and the 8-hour ozone CAAQS and NAAQS (SDAPCD 2020, 2021; EPA 2020c). Additionally, the SDAB is also classified as a Nonattainment Area with respect to the $PM_{2.5}$ and PM_{10} CAAQS. Attainment designations for the SDAB are shown in Table 3.3-2 for each criteria pollutant.

Table 3.3-2 Ambient Air Quality Standards and Current SDAB Attainment Status

Pollutant	Averaging Time	California (CAAQS)[a,b]		National (NAAQS)[c]	
		Standards	SDAB Attainment Status	Standards - Primary[b,d]	SDAB Attainment Status
Ozone	1-hour	0.090 ppm (180 µg/m^3)	Nonattainment	–	Attainment
	8-hour	0.070 ppm (137 µg/m^3)	Nonattainment	0.070 ppm (137 µg/m^3)	Nonattainment
Carbon monoxide (CO)	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9 ppm[f] (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen dioxide (NO_2)	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
	1-hour	0.18 ppm (339 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
Sulfur dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	—	—
	3-hour	—	Attainment	—	—
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Respirable particulate matter (PM_{10})	Annual arithmetic mean	20 µg/m^3	Attainment	—	—
	24-hour	50 µg/m^3	Attainment	150 µg/m^3	Nonattainment
Fine particulate matter ($PM_{2.5}$)	Annual arithmetic mean	12 µg/m^3	Attainment	12.0 µg/m^3	Nonattainment
	24-hour	—	—	35 µg/m^3	Attainment
Lead[e]	Calendar quarter	—	—	1.5 µg/m^3	Attainment
	30-Day average	1.5 µg/m^3	Attainment	—	—
	Rolling 3-Month Average	—	—	0.15 µg/m^3	Attainment
Hydrogen sulfide	1-hour	0.03 ppm (42 µg/m^3)	Unclassified	No national standards	
Sulfates	24-hour	25 µg/m^3	Attainment		
Vinyl chloride[e]	24-hour	0.01 ppm (26 µg/m^3)	Unclassified		
Visibility-reducing particulate matter	8-hour	Extinction of 0.23 per km	Unclassified		

Notes: µg/m^3 = micrograms per cubic meter; km = kilometers; ppb = parts per billion; ppm = parts per million (by volume).

[a] California standards for ozone, carbon monoxide, SO_2 (1- and 24-hour), NO_2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

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

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

[d] National primary standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[e] The California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold of exposure for adverse health effects determined. This allows for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

Source: EPA 2020C; SDAPCD 2020 and 2021

TOXIC AIR CONTAMINANTS

Toxic air contaminants (TACs) are a defined set of airborne pollutants that may pose a present or potential hazard to human health. A TAC is defined as an air pollutant that may pose a hazard to human health cause or contribute to an increased likelihood of serious illness or mortality. TACs are usually present in minute quantities in the ambient air; however, their high toxicity may pose a threat to public health even at low concentrations.

A wide range of sources, from industrial plants to motor vehicles, emit TACs. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage. Exposure to TACs may also result in short-term acute affects such as eye watering, respiratory irritation, coughing, running nose, throat pain, or headaches.

When evaluating health effects, TACs are commonly separated into carcinogens and non-carcinogens based on the nature of the physiological ailments associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur. This contrasts with criteria air pollutants and non-carcinogenic TACS, for which acceptable levels of exposure can be determined and for which the ambient standards have been established (in the case of criteria air pollutants).

According to the *California Almanac of Emissions and Air Quality* (CARB 2013), the majority of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter contained in diesel exhaust (diesel PM). In addition to diesel PM, the TACs for which data are available that pose the greatest existing ambient risk in California are benzene, 1,3-butadiene, acetaldehyde, carbon tetrachloride, hexavalent chromium, para-dichlorobenzene, formaldehyde, methylene chloride, and perchloroethylene.

Diesel PM poses the greatest health risk among these 10 TACs mentioned. Based on receptor modeling techniques, CARB estimated the average statewide cancer risk associated with diesel PM concentrations to be 360 excess cancer cases per million people in the year 2020 (CARB 2000:15). Overall, statewide emissions of diesel PM are forecasted to decline by 71 percent between 2000 and 2035 (CARB 2013:3-8).

SAN DIEGO AIR POLLUTION CONTROL DISTRICT

SDAPCD attains and maintains air quality conditions in the SDAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues.

The CCAA requires air districts to submit air quality plans for areas that do not meet CAAQS for ozone, CO, SO_2, and NO_2. SDAPCD has attained all CAAQS with the exception of ozone, PM_{10}, and $PM_{2.5}$ (SDAPCD 2020). The CCAA does not currently require air quality plans for PM_{10} and $PM_{2.5}$. Additionally, the SDAB has not attained the federal NAAQS for ozone. For the attainment and maintenance of ozone, in October of 2020, SDAPCD adopted its 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone (Attainment Plan), which examined air quality conditions and documents efforts made by SDAPCD to improve air quality (SDAPCD 2020). The Attainment Plan demonstrates how the SDAB will further reduce air pollutant emissions, including ozone precursors volatile organic compounds (VOC) and oxides of nitrogen (NO_X), to attain and maintain the NAAQS and CAAQS for ozone, and includes the San Diego Regional Air Quality Strategy, which addresses the CAAQS. The Attainment Plan is submitted to CARB for approval, and then to EPA as a revision to the San Diego portion of the California State Implementation Plan for attaining ozone standards.

Neither the District nor the City of San Diego has adopted CEQA thresholds for significance for air quality. SDAPCD does not provide specific quantitative thresholds for determining the significance of air quality impacts under CEQA. However, the SDAPCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (SDAPCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the source. Although these trigger levels do not generally apply to land development projects, for comparative purposes these levels may be used to evaluate increases in emissions.

SDAPCD Rule 20.2, which outlines these trigger levels states that any project that results in emissions increases equal to or greater than any of these levels, must:

> "demonstrate through an AQIA … that the project will not (A) cause a violation of a State or national ambient air quality standard anywhere that does not already exceed such standard, nor (B) cause additional violations of a national ambient air quality standard anywhere the standard is already being exceeded, nor (C) cause additional violations of a State ambient air quality standard anywhere the standard is already being exceeded, nor (D) prevent or interfere with the attainment or maintenance of any State or national ambient air quality standard." (SDAPCD 2019)

For projects with stationary-source emissions that are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant. For CEQA purposes, these trigger levels can be used to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality (Table 3.3-3; County of San Diego 2007). SDAPCD's trigger levels are tied to achieving or maintaining attainment designations with respect to the NAAQS and CAAQS, which are scientifically substantiated, numerical concentrations of criteria air pollutants considered to be protective of human health and public welfare.

In addition, under SDAPCD Rule 1200 and County guidelines, projects would have a significant impact related to emissions of TACs if they result in an incremental cancer risk greater than 10 in 1 million or a health hazard index (chronic and acute) greater than one.

Table 3.3-3 San Diego Air Pollution Control District Pollutant Trigger Levels

Pollutant	Emission Rate		
	lb/hr	lb/day	tons/yr
Carbon Monoxide (CO)	100	550	100
Oxides of Nitrogen (NO_X)	25	250	40
Particulate Matter (PM_{10})	—	100	15
Particulate Matter ($PM_{2.5}$)	—	55*	10*
Oxides of Sulfur (SO_X)	25	250	40
Lead and Lead Compounds	—	3.2	0.6
Volatile Organic Compounds (VOC)	—	75**	13.7***

Notes: lb/hr = pounds per hour; lb/day = pounds per day; tons/yr = tons per year

According to the City of San Diego, the hourly and yearly levels are most appropriately used in situations when temporary emissions like emergency generators or other stationary sources are proposed as a part of a project. The daily levels are most appropriately used for the standard construction and operational emissions.

* EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the South Coast Air Quality Management District.

** Threshold based on the threshold of significance for VOCs from the South Coast Air Quality Management District for the Coachella Valley. The terms VOC and reactive organic gases (ROG) are used interchangeably in CEQA air quality analyses.

*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2000 lbs/ton

Source: City of San Diego 2016a

3.3.2 Discussion

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

Less-than-significant impact. The SDAB is currently designated as nonattainment with respect to the NAAQS and CAAQS for ozone, and the CAAQS for PM_{10} and $PM_{2.5}$. Air quality planning for San Diego county is under the jurisdiction of SDAPCD, which has adopted the 2020 Plan for Attaining the National Ambient Air Quality Standards

for Ozone in the SDAB (Attainment Plan) to reduce emissions of VOC and NO_X, both ozone precursors, with the goal of ultimately achieving attainment status with respect the NAAQS and CAAQS (SDAPCD 2020). The Attainment Plan relies on emissions forecasts based on demographic and economic growth projections provided by city and county general plans. Projects whose growth is included in the projections used in the formulation of the Attainment Plan are considered to be consistent with the Attainment Plan and would not interfere with its implementation.

Implementation of the Project would include a PMPA to change the land use designation of the Project site from "Aviation-Related Industrial" to "Commercial Recreation", which allows for hotel use. The certified PMP defines "Aviation Related Industrial" uses as those closely linked to the airport due to the shipping of large quantities or highly specialized types of air cargo, and the servicing of aircraft. Activities include the manufacture and sale of aircraft, engines, parts, motors, machines, turbines and metal articles. In contrast, the "Commercial Recreation" category includes hotels, restaurants, convention center, recreational vehicle parks, specialty shopping, pleasure craft marinas, water dependent educational and recreational program facilities and activities, dock and dine facilities, and sportfishing. The "Aviation Related Industrial" uses under the current land use designation would include the use of heavy machinery to manufacture large, specialized types of air cargo and use of heavy-duty trucks to transport such cargo. In comparison, the Project proposes hotel accommodations in the form of PODs and private rooms as well as bar, restaurant, and café uses. Onsite and offsite emissions associated with the project were quantified for the Project and are consistent with a hotel land use. Such uses do not include use of heavy equipment or use of specialized truck deliveries. Therefore, the land use designation change under the PMPA is not anticipated to generate higher emissions than the previously designated use.

Because the Project's proposed use would not increase emissions compared to the previously designated use or result in an increase in the residential population, it would not conflict with or obstruct implementation of SDAPCD's Attainment Plan. The Project does not proposes uses that would generate significant emissions of VOC and NOx, precursors of ozone that are regulated by the Attainment Plan. Furthermore, as discussed in under item b), the short-term construction and long-term operation of the Project would not generate emissions of criteria air pollutants or precursors that would exceed SDAPCD's established trigger levels, which were developed as a metric to indicate whether a project's emissions would cumulatively contribute to the nonattainment designations in the SDAB (see Table 3.3-3). This would be a **less-than-significant** impact, and no mitigation would be required.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less-than-significant impact. The SDAB is designated as nonattainment with respect to the NAAQS and CAAQS for ozone, and the CAAQS for $PM_{2.5}$ and PM_{10}. The question from Appendix G of the CEQA Guidelines focuses on nonattainment pollutants. Therefore, the analysis herein is focused on PM_{10}, $PM_{2.5,}$ and the ozone precursors – VOC and NO_X. Estimated emissions of other criteria air pollutants (SO_X and CO) are also disclosed for informational purposes. The trigger levels developed by SDAPCD that are used as mass emission thresholds for this analysis are tied to attaining and maintaining the federal and State health-based standards. Projects that exceed these thresholds described above would result in a cumulative, regional air quality impacts and may also contribute to adverse health impacts affecting nearby receptors.

Short-Term Construction-Related Emissions of Criteria Air Pollutants and Precursors

Implementation of the Project would involve construction activities to develop the southern half of the existing one-story Annex Building and part of the adjacent parking lot into a two-story hotel. Based on information provided by the Project applicant/proponent, construction is anticipated to begin in June 2023, with expected completion in August 2024. Construction activities would result in temporary and intermittent emissions of criteria air pollutants and precursors from heavy-duty construction equipment, vendor truck trips, and worker commute trips. Earth-moving equipment (e.g., loaders, graders, scrapers, and dozers) would be used during site preparation and grading. Equipment such as forklifts, welders, air compressors, generators, and a micropile driver would be used during building construction and the application of architectural coatings.

Emissions of NO_X would be primarily associated with off-road construction equipment exhaust; secondary sources would include on-road trucks for the hauling of materials and equipment, as well as worker vehicles for commuting. Worker commute trips in gasoline-fueled vehicles, paving, and the application of architectural coatings would be the principal sources of VOC, with additional VOC coming from off- and on-road construction equipment. Emissions of fugitive PM_{10} and $PM_{2.5}$ dust are associated primarily with ground-disturbance activities during site preparation, excavation, and grading, and may vary as a function of such soil parameters such as silt content, soil moisture, wind speed, and the area of disturbance. Exhaust emissions from diesel equipment and worker commute trips also contribute to short-term increases in PM_{10} and $PM_{2.5}$, but to a much lesser extent than fugitive dust emissions.

The Project's construction-related emissions of criteria air pollutants and precursors were modeled based on Project specifications (e.g., construction schedule and building area) and default settings and parameters contained in the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 (CAPCOA 2017). The construction modeling performed for the Project assumes that construction activities that would result in criteria air pollutant and precursor emissions would occur over a 12-month period beginning in June 2023. It should be noted that the project description specifies a 14-month construction schedule. Construction emissions were modeled based on construction phasing and duration information provided by the Project applicant which indicates 12 months for emissions generating activities. The analysis herein is considered conservative as daily activities would be less intensive and lead to lower maximum daily emissions under a longer construction schedule. Refer to Appendix B for specific input parameters and modeling output results. Based on this modeling and as shown in Table 3.3-4, it is estimated that for nonattainment pollutants construction would generate up to 47 lb/day of VOC, 72 lb/day of NO_X, 22 lb/day of PM_{10}, and up to 13 lb/day of $PM_{2.5}$. These maximum daily emissions levels would not exceed the trigger levels listed in Table 3.3-3, and would, therefore, not contribute to an exceedance of any NAAQS or CAAQS nor lead to any adverse health impacts.

Table 3.3-4 Maximum Daily Construction Emissions of Criteria Air Pollutants and Precursors

Construction Year	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
	lb/day	lb/day	lb/day	lb/day	lb/day	lb/day
2023	8.5	72	57	<1	22	13
2024	47	60	67	<1	3	3
Maximum Daily Emissions	47	72	67	<1	22	13
SDAPCD Thresholds of Significance	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No

Source: City of San Diego 2016a

Notes: VOC = volatile organic compounds; CO = carbon monoxide; SO_X = oxides of sulfur; NO_X = oxides of nitrogen; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; SDAPCD = San Diego Air Pollution Control District.

Long-Term Operational Related Criteria Air Pollutants and Precursors

Project operations would result in the generation of emissions of criteria air pollutants and precursors. Mobile-source emissions would be generated from employee's commute vehicles traveling to and from the project site, delivery and maintenance vehicles, as well as vehicles used by hotel guests and restaurant patrons. As identified in Section 3.17, "Transportation," the project would generate an estimated 835 daily vehicle trips, 379 for the lodging and 456 for bar, restaurant, and café uses.

Project operation would result in the generation of long-term operational emissions of VOC, NO_X, PM_{10} and $PM_{2.5,}$ CO, and SO_X as a result of area-wide, energy, mobile, and off-road sources. Area-wide and energy sources would include the periodic application of architectural coatings and the generation of VOCs from the use of consumer products. Mobile-source emissions of criteria air pollutants and precursors would result from vehicle trips generated by employee commute trips, and other associated vehicle trips (e.g., deliveries, visitors).

Table 3.3-4 summarizes the operational emissions of criteria air pollutants and precursors during the first operational year of the Project, 2025. Emissions were calculated using CalEEMod and are based on the proposed land use type

and number of trips (Appendix B). For the purpose of modeling emissions associated with natural gas usage and area sources at the Project in CalEEMod, the 'motel' land use was used and two PODs were assumed to be equivalent to one motel room, while one family room was assumed to be equivalent to one motel room. These assumptions are considered conservative, as a motel room typically accommodates from one to four occupants, and so the energy and water consumption, and associated emissions, would be roughly equivalent to either one family room or two PODs at the Project. As shown in Table 3.3-4, Project operational-related emissions would not exceed the applicable thresholds of significance, nor would emissions result in adverse health impacts affecting nearby receptors.

Table 3.3-5 Operational Emissions of Criteria Air Pollutants and Precursors (2025)

Source Type	VOC (lb/day)	NO_X (lb/day)	CO (lb/day)	SO_X (lb/day)	PM_{10} (lb/day)	$PM_{2.5}$ (lb/day)
Area Sources[a]	0.7	<0.1	<0.1	<0.1	<0.1	<0.1
Mobile (Vehicle Trips)[b]	1.0	3.3	8.2	<0.1	2.2	0.6
Natural Gas Usage	<0.1	0.8	0.6	<0.1	<0.1	<0.1
Total	**1.8**	**4.1**	**8.9**	**<0.1**	**2.3**	**0.7**
SDAPCD Thresholds of Significance	**75**	**250**	**550**	**250**	**100**	**55**
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Notes: VOC = volatile organic compounds; NO_X = oxides of nitrogen; CO = carbon monoxide; SO_X = oxides of sulfur; PM_{10} = respirable particulate matter; $PM_{2.5}$ = fine particulate matter; lb/day = pounds per day; tons/year = tons per year; SDAPCD = San Diego Air Pollution Control District; N/A = not applicable.

a. Area-source emissions include emissions from the application of architectural coatings as part of regular maintenance and consumer products.

b. Mobile-source emissions were estimated using average daily trips (ADT) calculated by the traffic analysis prepared for the project (Appendix G).

Source: Modeling conducted by Ascent Environmental in 2021

Summary

The levels of criteria air pollutants and precursors generated during project construction and operation would not exceed the applicable mass emission thresholds based on SDAPCD trigger levels. Therefore, Project-related emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is in nonattainment with the CAAQS and NAAQS. In addition, the Project would not exacerbate or interfere with the region's ability to attain any health-based standards and would not cause adverse health impacts related to criteria air pollutant emissions. Therefore, this would be a **less-than-significant** impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less-than-significant impact. Sensitive receptors include land uses where exposure to pollutants could result in health-related risks to sensitive individuals, such as children or the elderly. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and the potential for increased and prolonged exposure of individuals to pollutants. The Project is in a commercial and industrial area with development consisting of the Port Administration Building and airport-related commercial uses, including car rental offices, private general aviation services, airport parking, and service stations. East of the adjacent railroad corridor and I-5 freeway lies a residential area composed of single- and multi-family homes, along with various neighborhood bars and retail stores interspersed throughout. The closest receptors to the project site are occupants of the single-family and multi-family residences on India Street, which lie approximately 700 feet east of the Project site, and at a higher elevation than the Project site.

The potential cancer risk from inhaling diesel PM outweighs the potential for all other diesel PM–related health impacts (i.e., noncancer chronic risk, short-term acute risk) and health impacts from other TACs (CARB 2015). With regards to exposure of diesel PM, the dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the duration of exposure to the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher level of health risk for any exposed receptor. Thus, the risks estimated for an exposed individual are

higher if a fixed exposure occurs over a longer period. According to the Office of Environmental Health Hazard Assessment, when a Health Risk Assessment is prepared to analyze exposure of sensitive receptors to selected compounds, exposure of sensitive receptors to TAC emissions should be based on a 70- or 30-year exposure period; however, such assessments should be limited to the duration of activities associated with the proposed project if emissions occur for shorter periods (OEHHA 2015:5-23, 5-24).

Construction

Construction-related activities would result in temporary, intermittent emissions of diesel PM from the exhaust of off-road, heavy-duty diesel equipment. In addition, it is estimated that construction activities would require approximately 50 truck trips over the duration of construction. These truck trips would not occur in a single day and would not be concentrated in the vicinity of sensitive receptors for an extended period of time. Construction activities would occur at a minimum of 700 feet away from the nearest sensitive receptor (i.e., the residences on India Street, east of I-5). Construction activities would occur at varying locations on site and would occur at least 700 feet from the nearest sensitive receptor over a short duration of construction activity. Studies show that diesel PM is highly dispersive and that concentrations of diesel PM decline with distance from the source (Zhu et al. 2002). These studies illustrate that receptors must be near emission sources for a long period to experience exposure at concentrations of concern.

Based on emissions modeling, maximum daily emissions of exhaust $PM_{2.5}$, which is the largest, most toxic component of combustion exhaust PM and is thus used as a surrogate for diesel PM, would not exceed 13 lb/day during construction (see Table 3.3-4). This is well below the 55 lb/day threshold, as outlined above in Table 3.3-3. Moreover, as noted above, construction was assumed to occur over a 12-month period, which is an extremely short exposure timeframe.

Considering the highly dispersive properties of diesel PM, the relatively low mass of diesel PM emissions that would be generated at any single location during project construction, and the relatively short period during which diesel PM–emitting construction activities would take place, as well as the fact that the nearest sensitive receptor is at least 700 feet away and east of I-5, construction-related emissions would not result in sensitive receptors being exposed to a substantial concentration of TACs and would not result in an increased risk of adverse health impacts.

Operations

Project operations would result in the long-term emissions of diesel PM at nominal levels from project-generated vehicle trips. In particular, diesel-powered trucks associated with the proposed Project activities, particularly delivery vehicles supporting hotel, restaurant, and café operations, could emit diesel PM at the Project site. However, the frequency of delivery trips to and from the Project site by diesel-powered heavy duty trucks would occur on an intermittent basis (conservatively assumed to be up to 20 trips per day based upon the assumed number of guests served by the hotel and associated amenities). Based on CARB's Air Quality and Land Use Handbook, distribution centers with truck volumes of 100 trucks per day can expose sensitive receptors to exacerbated health risks (CARB 2005). The daily truck trips anticipated to be generated by the project would be well below this reference level. It should also be noted that the California Air Resources Board and other applicable regulatory agencies either have adopted or are working to adopt regulations to phase out older diesel emitting trucks and promote the use of zero emissions or near zero emissions trucks. As those regulations are implemented, diesel PM emissions associated with the Project, while already low given the minimal number of diesel PM emissions sources associated with the Project, will continue to diminish. As a result, operation of the Project would not result in a substantial increase in concentrations of diesel PM at or near the Project site. Thus, operational TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a health hazard index greater than or equal to one.

Summary

Due to the dispersive properties of diesel PM, the relatively low mass diesel PM emissions that would be generated in one place during the construction and operation of the Project, the relatively short construction period, and the closest sensitive receptors being at least 700 feet away and east of I-5, Project-related TACs would not expose sensitive receptors to an incremental increase in cancer risk that exceeds 10 in one million or a health hazard index of 1.0 or greater. As a result, the Project would not expose sensitive receptors to quantities of pollutants greater than

significance thresholds and no significant risk of adverse health impacts would result from exposure. This impact would, therefore, be **less than significant** and no mitigation would be required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less-than-significant impact. The Port Administration Building, which is adjacent to the Project site, is the nearest location where a substantial number of people could be present at a given time, and the occupants of the building spend most of their time indoors. Odors from the use of heavy-duty diesel equipment during Project construction activities would be intermittent and temporary and would dissipate rapidly from the source with an increase in distance. Therefore, Project construction is not anticipated to result in an odor-related impact. Project operations would not include activities that typically generate odors, such as those associated with wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, or food processing facilities. Activities associated with the Project, including hotel and restaurant operations and events for guests and the public such as private parties, beverage tastings, and workout classes, would be limited and would not generate odors affecting a substantial number of people. Occupants of the building adjacent to the Project site spend most of their time indoors and would not be affected by objectionable odors on an ongoing basis. Implementation of the Project would therefore not result in exposure of a substantial number of people to objectionable odors. Thus, this impact would be **less than significant**, and no mitigation is required.

3.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. Biological Resources.				
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 the 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 the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, 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?	☐	☐	☐	☒

3.4.1 Environmental Setting

This section describes biological resources on the Project site and evaluates potential impacts to these resources as a result of Project implementation. To determine the biological resources that may be subject to impacts from the Project, Ascent biologists conducted a biological reconnaissance visit on December 9, 2020 and reviewed several existing data sources including:

- California Natural Diversity Database (CNDDB) record search of the La Jolla, La Mesa, Point Loma, National City, and Imperial Beach U.S. Geological Service 7.5-minute quadrangles (CNDDB 2020);
- California Native Plant Society, Inventory of Rare and Endangered Plants of the La Jolla, La Mesa, Point Loma, National City, and Imperial Beach U.S. Geological Service 7.5-minute quadrangles (CNPS 2020);

- U.S. Fish and Wildlife Service Information for Planning and Consultation project planning tool (IPaC) (USFWS 2020); and
- California Wetlands Monitoring Workgroup EcoAtlas (CWMW 2020).

VEGETATION AND HABITAT TYPES

The Project site is in a highly developed area near SDIA and surrounding airport-related commercial and industrial development and does not contain natural terrestrial habitat. The Project site is predominantly flat with approximately one to three feet in elevation change across the site. Existing vegetation on the Project site consists of ornamental landscaping trees and shrubs. Vegetation adjacent to the Project site consists of ornamental street trees and sidewalk landscaping along Pacific Highway. The sloped bank of the railroad berm located immediately adjacent to the Project site contains ornamental vegetation and nonnative plant species. Trees and shrubs within and adjacent to the Project site include fig (*Ficus* sp.), queen palm (*Syagrus romanzoffiana*), Mexican fan palm (*Washingtonia robusta*), Canary Island pine (*Pinus canariensis*), carrotwood (*Cupaniopsis anacardioides*), Australian willow (*Geijera parviflora*), Russian thistle (*Salsola* sp.), bank catclaw (*Acacia redolens*), and great bougainvillea (*Bougainvillea spectabilis*).

SPECIAL-STATUS SPECIES

Special-status species are plants and animals in the following categories:

- listed or proposed for listing as threatened or endangered under the federal Endangered Species Act or candidates for possible future listing;
- listed or candidates for listing by the State of California as threatened or endangered under the California Endangered Species Act;
- listed as rare under the California Native Plant Protection Act;
- listed as Fully Protected under the California Fish and Game Code;
- identified by California Department of Fish and Wildlife (CDFW) as species of special concern;
- taxa considered by CDFW to be "rare, threatened, or endangered in California" and assigned a California Rare Plant Rank (CRPR). The CDFW system includes six rarity and endangerment ranks for categorizing plant species of concern, which are summarized as follows:
  - CRPR 1A - Plants presumed to be extinct in California;
  - CRPR 1B - Plants that are rare, threatened, or endangered in California and elsewhere;
  - CRPR 2A - Plants that are presumed extirpated in California, but more common elsewhere;
  - CRPR 2B - Plants that are rare threatened, or endangered in California, but more common elsewhere.
  - CRPR 3 - Plants about which more information is needed (a review list); and
  - CRPR 4 - Plants of limited distribution (a watch list).

  All plants with an assigned CRPR are considered "special plants" by CDFW. The term "special plants" is a broad term used by CDFW to refer to all of the plant taxa inventoried in CDFW's CNDDB, regardless of their legal or protection status. Plants ranked as CRPR 1A, 1B, 2A, and 2B may qualify as endangered, rare, or threatened species within the definition of CEQA Guidelines Section 15380. CDFW recommends that potential impacts to CRPR 1 and 2 species be evaluated in CEQA documents. In general, CRPR 3 and 4 species do not meet the definition of endangered, rare, or threatened pursuant to CEQA Guidelines Section 15380. However, these species may be evaluated by the lead agency on a case-by-case basis. For this analysis, CRPR 3 and 4 species are not included because the Project site does not contain any natural habitats and therefore does not contain suitable habitat for any CRPR 3 and 4 plant species.

- considered a locally significant species, that is, a species that is not rare from a statewide perspective but is rare or uncommon in a local context such as within a county or region (CEQA Section 15125 (c)) or is so designated in local or regional plans, policies, or ordinances (CEQA Guidelines, Appendix G); or
- otherwise meets the definition of rare or endangered under CEQA Section 15380 (b) and (d).

The CNDDB is a statewide database, managed by CDFW that is continually updated with the location and condition of the state's rare and declining species. Although the CNDDB is the most current and reliable tool available for tracking occurrences of special-status species, it contains only those records that have been reported to CDFW. Therefore, it is possible that a rare plant or animal could be present on the property but not documented in the CNDDB.

Based on the reconnaissance survey and a review of existing data sources (CNDDB 2020, CNPS 2020, USFWS 2020), 49 special-status wildlife species and 73 special-status plant species are documented in the Project vicinity and have potential to occur on the Project site. Species ranges and habitat requirements were examined for these species. The Project site does not contain habitat suitable for any of the plant species and/or is not within the range of the species. No special-status plant species occur on the Project site. Refer to Appendix C for additional detail.

In urban areas within San Diego County, some species of bats may use buildings for day, maternity, or night roosts (Tremor et al. 2017). Bats may roost in abandoned or little-used structures in wall sections, behind fascia, in spaces between vaulted interior ceiling and roofing materials, and in similar enclosed spaces that provide thermal protection. Bats may forage in riparian areas along the San Diego River, along channelized waterways, in wooded urban parks or neighborhoods, in urban landscaped areas, and around artificial lights. Foraging areas are limited within the immediate vicinity of the Project site, and the San Diego River is located approximately 2.5 miles north of the Project site. Species of bats known to roost in buildings or structures in urban and suburban areas within San Diego County include Mexican free-tailed bat (*Tadarida brasiliensis*) and big brown bat (*Eptesicus fuscus*). Neither Mexican free-tailed bat nor big brown bat is considered a special-status species; however, maternity bat roosts can be considered an important biological resource because bat species reproduce very slowly. The vacant portion of the Annex building within the Project site could provide potential roost habitat for Mexican long-tongued bat (*Choeronycteris mexicana*), a special-status species, and common bat species.

The landscape trees and shrubs could provide suitable nesting habitat for native bird species that do not have a special-status designation but are afforded protection under state and federal law. No other special-status wildlife is expected to occur on the Project site because of lack of suitable habitat.

3.4.2 Discussion

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 the U.S. Fish and Wildlife Service?

Less-than-significant impact with mitigation incorporated. Ground disturbance and staging associated with the Project is located within developed land (e.g., existing building, paved parking lot) and, as previously explained, there are no special-status plants on the Project site. Therefore, the Project would have no impact on special-status plant species.

Similarly, most special-status wildlife species are not expected to occur on the Project site because the site does not contain suitable habitat. However, Mexican long-tongued bat and other common bat species could roost in the buildings and pedestrian bridge, and native bird species, which are protected under state law, could nest in the landscaping vegetation on the site.

Nesting Birds

Project construction activities during the bird breeding season (generally February 1 through September 15), including demolition, micro piledriving, and presence of construction equipment and crews, could generate noise and visual stimuli that may result in disturbance to active bird nests, if present, potentially resulting in nest abandonment or forced fledging and subsequent loss of fertile eggs, nestlings, or juveniles. Project construction would also include removal of ornamental landscape trees and shrubs and therefore has the potential to result in direct removal of bird nests. The Migratory Bird Treaty Act (MBTA) makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers, or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Nevertheless, because destruction of any listed migratory bird nest is a violation of the MBTA and Sections 3505, 3503.5, and 3800 of the California Fish and Game Code also prohibit the take, possession, or destruction of birds, their nests, or eggs, Mitigation Measure BIO-1 is proposed to require compliance with these regulations and avoid loss of common nesting birds. Before construction activities would be permitted to occur during bird breeding season, Mitigation Measure BIO-1 would require that any active nests in the construction area or vicinity be identified and avoided or monitored so that nest abandonment and loss of eggs or young would not occur.

Special-Status and Common Bat Species Roosts

Mexican free-tailed bat and big brown bat could use the vacant portion of the Annex building or the underside portion of the pedestrian bridge over Pacific Highway that connects to the Annex building for temporary stopover or day or night roost habitat; however, use of these areas for a maternity colony is unlikely because the potential roost habitat is in a highly disturbed urban area and suitable high quality foraging habitat does not occur on the Project site or vicinity. Therefore, the resources necessary to support a maternity colony for Mexican free-tailed bat and big brown bat are not present in the Project site or vicinity.

Mexican long-tongued bat, a CDFW species of special concern, could use the vacant portion of the Annex building or the underside portion of the pedestrian bridge over the Pacific Highway that connects to the Annex building for temporary stopover or day or night roost habitat. This bat species feeds on nonnative plants used for landscaping, particularly nectar producing exotic plants and is also known to feed at hummingbird feeders. Mexican long-tongued bat could feed on landscaping plants in the Project vicinity such as palm tree blooms, bird of paradise, banana plant, agaves, cacti, and bottlebrush. Mexican long-tongued bat has been detected in the San Diego area mainly between mid-September and February and there is no evidence that this species breeds in the San Diego area.

Several other special-status bat species, including western red bat (*Lasiurus blossevillii*), western yellow bat (*Lasiurus xanthinus*), and western mastiff bat (*Eumops perotis californicus*) could occur in the larger Project vicinity, and are documented in the CNDDB within the search area. These species could occur in the riparian areas along the San Diego River and could forage on the limited vegetation in the Project site, but these species are not expected to roost long-term in the Project site. Western mastiff bat could potentially use the vacant Annex building or palm trees in the Project site, and western red bat and western yellow bat could use the landscape trees in the Project site and vicinity as temporary or stopover roost habitat for a night, particularly if they are foraging in the vicinity. This would likely be limited to single individuals. However, the potential is low and would be limited and highly incidental because the Project site is not within the preferred habitats of these species. In addition, these special-status bat species are highly sensitive to human disturbance and the developed and highly disturbed setting of the surrounding urban area would likely preclude them from occurring on the Project site. Therefore, removal of the landscape trees and reuse of the Annex building would have no impact on western red bat, western yellow bat, and western mastiff bat or their roosts.

The Project includes construction of a second story on the Annex building and expansion of the existing roof on the west and south sides. Construction-related disturbance associated with reuse and structural improvements of the Annex building could result in the loss of Mexican long-tongued bat or other common cavity-roosting bat colonies, in the unlikely event roosts were present. Project activities adjacent to the area under the portion of the pedestrian bridge that connects to the Annex building could also result in adverse indirect impacts through increased noise and human disturbance to roosts on the underside of the pedestrian bridge, in the unlikely event roosts were present. Roosts were not observed during the reconnaissance survey of the project site. In addition, maternity season (summer) is considered the most sensitive period for roosting bats, and disturbance to roosts during this time can adversely affect bats. Because

Mexican long-tongued bat occurs in the San Diego area primarily during the fall and winter, outside of the sensitive maternity season, roosts are not expected to occur on or near the Project site and construction activities would not adversely affect this species. In conclusion, the Project site is located in an urban area with limited foraging habitat and the vacant Annex building provides low-quality artificial, temporary roost habitat for Mexican long-tongued bat and other common cavity-roosting bats. Moreover, Mexican long-tongued bat are not known to occur in the San Diego area during their sensitive maternity season. Therefore, the unlikely loss of potential non-maternal roost habitat would be a **less-than-significant** impact.

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 the U.S. Fish and Wildlife Service?

No impact. The Project site is located within developed areas and contains landscaped vegetation and nonnative weeds. The Project site does not contain sensitive natural communities (e.g., riparian habitat, vernal pools). **No impact** on sensitive natural communities would occur, and no mitigation is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No impact. The Project site does not contain any wetland, stream, or other aquatic habitat that could be considered jurisdictional waters of the United States or state. All Project activities would take place within previously developed areas. Therefore, **no impact** to wetlands or other waters of the United States or state would occur, and no mitigation is required.

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?

No impact. The Project site is located within an urban setting (see Figure 2-2) with developed land cover and contains landscaped vegetation. This urban and disturbed setting does not support native wildlife nursery sites. The Project would not alter any existing wildlife corridor and would not interfere with the movement of migratory fish or wildlife species. Therefore, **no impact** on the movement of native resident or migratory fish or wildlife species, movement corridors, or native wildlife nursery sites would occur, and no mitigation is required.

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

Less-than-significant impact. The Project is not in conflict with any Port Master Plan policies regarding the protection of biological resources and is consistent with BPC Policy No. 713, Tenant Landscaping Improvements and Maintenance, including Appendix A to BPC Policy No. 713, Landscape Development Manual: Guidelines and Standards for Landscape Improvement and Maintenance (San Diego Unified Port District 2009).

The Project would result in removal of existing and planting of new street trees within the public right-of-way as defined by San Diego Municipal Code 62.0600. The San Diego Municipal Code (Section 62.0601, "Planting on City Streets – Definition") defines the word "street" to be any public street, public way, public alley, public lane or parkway upon or along any public street or public way. There are nine existing nonnative ornamental street trees along the Project site's Pacific Highway frontage, most of which are palm trees. Removal of existing trees and planting of new street trees would require approval from the City of San Diego. The Project application for removal of street trees shall include a detailed site plan that describes the replanting of street trees consistent with the community's street tree plan or match the existing species in the community. All new trees installed must conform to the City's Landscape Regulations and Standards. Because the Project would comply with City of San Diego requirements for removal and planting of new street trees it would not conflict with any local policies or ordinances protecting biological resources. This is a **less-than-significant** impact, and no mitigation is required.

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?

No impact. The Project falls within the boundary of the San Diego Multiple Species Conservation Program but the City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan does not identify the Project site or surrounding area as being within the Multiple Habitat Planning Area. In addition, the District is not subject to the MSCP. As a result, it would not conflict with the provisions of any such plan. The District also has an approved San Diego Bay Integrated Natural Resources Management Plan (INRMP), which was prepared to ensure the long-term health, restoration, and protection of the San Diego Bay's ecosystem in concert with the bay's economic, Naval, navigational, recreational, and fisheries needs. The Project would not conflict with the INRMP because it is located on an existing developed area approximately 0.5 mile inland from San Diego Bay and would not result in any adverse effects to the ecosystem of San Diego Bay. Therefore, the Project would result in **no impact**, and no mitigation is required.

REQUIRED MITIGATION MEASURES

The following mitigation measure would require compliance with MBTA and Sections 3505, 3503.5, and 3800 of the California Fish and Game.

BIO-1: Avoid Direct Loss and Disturbance of Nesting Protected Birds

- For Project construction activities, including tree or vegetation removal, that begin between February 1 and September 15, a qualified biologist shall conduct preconstruction surveys to identify active bird nests on and within 50 feet of the Project site. The surveys shall be conducted no more than 14 days before construction commences. If no active nests are found during focused surveys, no further action under this measure shall be required.
- If nests are identified during the preconstruction surveys, impacts to nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction surveys. Buffer distances shall be established by a qualified biologist using available protocols published by State or federal agencies with jurisdiction over the observed species, or if no protocols are available, then based on the professional judgment and discretion of the qualified biologist. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. A qualified biologist shall establish a non-disturbance buffer at a distance sufficient to minimize nest disturbance based on the nest location, topography, cover, the species' sensitivity to disturbance, and the intensity/type of potential disturbance. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist.

3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources.				
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Substantially disturb human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

3.5.1 Environmental Setting

RECORDS SEARCH

A cultural resources records search was obtained from the South Coastal Information Center (SCIC), which is located at San Diego State University and is part of the California Historical Resources Information System. The records search provides for identification of previously documented resources within and near the Project site. The records search revealed that a total of 33 cultural resources surveys have been conducted within a quarter-mile radius of the Project site. Of these, 10 have covered at least some portion of the site. Within a quarter-mile radius of the Project site, the record search revealed the presence of 35 previously recorded resources; of these, 28 are built-environment architectural features and seven are historic-period archaeological sites (primarily trash scatters and abandoned railroad grades). No prehistoric or historic-period archaeological sites have been recorded on the Project site or within the search radius. Only one previously recorded built-environment feature is located within or immediately adjacent to the Project site; P-37-015554 is the footbridge that crosses over the Pacific Highway from the existing Annex Building on the Project site and has been evaluated as not eligible for either the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP).

HISTORICAL RESOURCES EVALUATION

Because the Project site consists of harbor fill and is entirely developed with buildings and pavement, a site visit was not conducted to identify archaeological resources. Ascent conducted a survey of the Project site for built-environment historical resources. Ascent inventoried and evaluated the District Administration Building and the existing Annex Building under CRHR and NRHP criteria to determine if the Project has the potential to cause a substantial adverse change to historical resources under CEQA. The results are documented in the Historic Resource Evaluation Report provided in Appendix D. Note that Appendix D refers to the existing Annex Building as the former Budget Rental Car building. The evaluation concluded that the buildings do not appear to meet the criteria for listing on either of the registers, because of a lack of significance and compromised physical integrity that precludes direct association to the historic period (Appendix D; Ascent 2021)

3.5.2 Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No impact. The existing buildings on the Project site have been found ineligible for listing as a historical resource, as they do not meet the criteria for listing in the CRHR or the NRHP. They do not meet the definition of a historical resource pursuant to CEQA due to a lack of significance and compromised physical integrity that precludes direct association to the historic period. Therefore, there would be **no impact** to historical resources.

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

Less-than-significant impact with mitigation incorporated. The SCIC records search did not reveal any previously identified prehistoric or historic-period archaeological resources on the Project site; 7 historic-period archaeological sites were identified in the quarter-mile search radius. These 7 sites consist primarily of industrial refuse, roadways, and water conveyance systems; these 7 sites in a quarter-mile radius of the project show the potential for additional historic-period archaeological sites to be discovered within the project site. Because the Project site is situated on harbor fill it is unlikely that it contains prehistoric archaeological resources. However, given the history of the Project site and the proximity to the railroad line, there is a potential that historic-period archaeological resources could be unearthed during ground-disturbing construction activities. Damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5 would be a potentially significant impact. Mitigation Measure CUL-1 is proposed to reduce impacts to archaeological cultural resources to a **less-than-significant** level by requiring (1) a halt to nearby construction and an evaluation of any historic-period archaeological resources are discovered and (2) consideration of preservation options and proper curation if significant artifacts are recovered.

c) Substantially disturb human remains, including those interred outside of formal cemeteries?

Less-than-significant impact. There are no known cemeteries or burials on the Project site or immediate area. However, because ground disturbing activities associated with Project construction would occur, there is potential to encounter buried human remains or unknown cemeteries in areas with little or no previous disturbance.

California law recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.

These statutes require that, if human remains are discovered, potentially damaging ground-disturbing activities in the area of the remains shall be halted immediately, and the County coroner shall be notified immediately. If the remains are determined by the coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. Following the coroner's findings, the NAHC-designated Most Likely Descendant and the landowner shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments, if present, are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in Public Resources Code (PRC) Section 5097.94.

Compliance with California Health and Safety Code Section 7050.5 and California PRC Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered. Therefore, this impact would be **less than significant**.

REQUIRED MITIGATION MEASURES

The following mitigation measure would reduce the potentially significant impact to archaeological cultural resources to less than significant.

CUL-1: Unanticipated Discoveries of Archaeological Resources

Before initiation of ground disturbance, the project applicant shall design and implement a Worker Awareness Training Pamphlet that shall be provided to all construction personnel and supervisors who will have the potential to encounter cultural resources. The pamphlet shall describe, at a minimum:

- types of cultural resources expected in the project area;
- types of evidence that indicate cultural resources might be present (e.g., trash scatters; historic-era bottles);
- what to do if a worker encounters a possible resource;
- what to do if a worker encounters bones or possible bones; and
- penalties for removing or intentionally disturbing cultural resources, such as those identified in the Archeological Resources Protection Act.

In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. The District will be notified of the potential find and a qualified archaeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable CRHR regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), avoidance of the resource is the preferred treatment. If avoidance of the significant resource is not possible, the archaeologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If necessary, the data recovery plan will include a research design that will be developed, based on the type and nature of the significant resource, to answer scientific questions about our past that is in the public interest. The data recovery plan will also be performed in compliance with the Secretary of the Interior's Standards and Guidelines for Archaeology. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

3.6 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy.				
Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

3.6.1 Environmental Setting

California relies on a regional power system composed of a diverse mix of natural gas, petroleum, renewable, hydroelectric, and nuclear generation resources.

Petroleum: Petroleum products (gasoline, diesel, jet fuel) are consumed almost exclusively by the transportation sector, and account for almost 99 percent of the energy used in California by the transportation sector, with the rest provided by ethanol, natural gas, and electricity (Bureau of Transportation Statistics 2015). Between January 2011 and August 2020, approximately 171.5 billion gallons of gasoline and diesel fuel were purchased in California (California State Board of Equalization 2020). Gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet specific formulations required by CARB (EIA 2018).

Natural Gas: Almost two-thirds of California households use natural gas for home heating, and about half of California's utility-scale net electricity generation is fueled by natural gas (EIA 2018).

Electricity and Renewables: The California Energy Commission (CEC) estimates that 34 percent of California's retail electricity sales in 2018 will be provided by Renewables Portfolio Standard (RPS)-eligible renewable resources such as solar and wind (CEC 2019a). Additionally, the CEC's Energy Efficiency Action Plan (CEC 2019b) focuses on energy efficiency savings in new and existing buildings and reducing greenhouse gas (GHG) emissions and provides strategy recommendations for realizing these goals. The 2019 Energy Efficiency Action Plan is separated into three goals that drive energy efficiency: doubling energy efficiency savings by 2030, removing and reducing barriers to energy efficiency in low-income and disadvantaged communities, and reducing GHG emissions from the buildings sector.

Alternative Fuels: Conventional gasoline and diesel may be replaced (depending on the capability of the vehicle) with many alternative transportation fuels (e.g., biodiesel, hydrogen, electricity, and others). Use of alternative fuels is encouraged through various statewide regulations and plans (e.g., Low Carbon Fuel Standard, Assembly Bill [AB] 32 Scoping Plan).

ENERGY FACILITIES AND SERVICES IN THE COUNTY

- Electric and natural gas services in San Diego county is provided by the San Diego Gas and Electric Company (SDG&E), a subsidiary of Sempra Energy. SDG&E operates electricity and natural gas infrastructure in the county, including power lines, power plants, pipelines, and substations. As of 2018, SDG&E procured 44 percent of its electricity from renewable sources (CEC 2019c). This project would receive electricity services only from SDG&E.

3.6.2 Discussion

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less-than-significant impact. Thresholds that define when energy consumption is considered wasteful, inefficient, or unnecessary have not been established in federal or state law or in the State CEQA Guidelines. Compliance with the California Energy Code would result in energy-efficient buildings. However, compliance with building codes alone does not adequately address all potential energy impacts during construction and operation. For example, energy would be required to transport people and goods to and from the Project site. The nature of the Project, which has been specifically designed as a low-consumption, environmentally friendly lodging facility, would result in further efficiency beyond California Energy Code standards. Energy use is discussed further below.

Construction

Energy would be required to operate and maintain construction equipment and transport construction materials. The one-time energy expenditure required to construct the Project would be nonrecoverable. Most energy consumption would result from operation of off-road construction equipment and on-road vehicle trips associated with construction worker commute trips and vendor haul truck trips.

The energy consumption associated with Project construction by year was estimated using CalEEMod Version 2016.3.2, and supplemented with vehicle and off-road equipment fuel consumption determined using CARB's Emissions Factor (EMFAC) and Off-Road Inventory Online (ORION) models. Most of the construction-related energy consumption would be associated with off-road equipment and the transport of equipment and waste using on-road haul trucks for all phases of construction. An estimated 88 gallons of gasoline and 210,387 gallons of diesel fuel would be used during Project construction (Appendix B).

The energy needs for construction would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Associated energy consumption for construction would be typical of that associated with similar facilities. Automotive fuels would be consumed to transport construction workers and materials to and from the Project site. Energy would be required for construction elements and transport of construction materials. The one-time energy expenditure required to construct the physical infrastructure associated with the Project would be nonrecoverable. However, energy efficiency would be maximized through the enforcement of idling requirements and State fuel efficiency standards and thus, the energy consumption associated with Project construction would not occur in a wasteful, inefficient, and unnecessary manner when compared to other construction activity in the region.

Operational

The Project would increase electricity and natural gas consumption in the region relative to existing conditions. However, the new facilities would, at a minimum, comply with 2019 California Energy Code standards, CEC updates the California Energy Code every 3 years with more stringent design requirements for reduced energy consumption, which results in the generation of fewer GHG emissions. The 2019 California Energy Code applies to projects constructed after January 1, 2020. The redevelopment of the southern half of the existing Annex Building would make that portion of the building consistent with current Energy Code (2019 version at a minimum). The Annex building was constructed in 1959 so the redevelopment would significantly improve the energy efficiency of that portion of the building. Table 3.6-1 summarizes the estimated energy consumption associated with construction and the first full year of operations in 2025. These estimates are based on modeling using CalEEMod Version 2016.3.2 (CAPCOA 2016), supplemented with vehicle and off-road equipment fuel consumption determined using CARB's EMFAC and ORION models, which was also used to estimate emissions for the air quality and GHG analyses.

Table 3.6-1 Annual Construction and Operational (2025) Energy Consumption

Energy Type	Annual Energy Consumption	Units
Operations		
Electricity from the Grid	658	MWh/year
Natural Gas	2,965	MMBtu/year
Gasoline	40,762	gal/year
Construction		
Gasoline[a]	88	gallons
Diesel	210,387	gallons

Notes: MWh/year = megawatt-hours per year; MMBtu/year = million British thermal units per year; gal/year = gallons per year

[a] Consumption by worker commute trips

Source: Calculations performed by Ascent Environmental in 2021.

California Energy Code standards for, at a minimum, 2019 would be integrated into the Project to reduce the Project's energy demands. The Project would also encourage reduced fuel consumption by providing shared transportation services, including scooters and bicycles, as well as being located near public bus and trolley lines. Energy efficiency would also be inherent in the design of the Project. PODs are small, temporary lodging spaces that are intended to maximize space and energy efficiency. In addition, the Project's gasoline and diesel consumption would be subject to State and federal regulations regarding fuel efficiency standards for vehicles. For these reasons, the Project's operational consumption of electricity would not be considered wasteful, inefficient, or unnecessary. This impact would be **less than significant**.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than significant. Relevant plans that pertain to the efficient use of energy include the Energy Efficiency Action Plan, which focuses on energy efficiency for buildings (CEC 2019b) and the District's CAP which includes strategies to reduce GHG emissions. Additional information on the CAP is provided in Section 3.8, Greenhouse Gas Emissions.

SANDAG's Regional Energy Strategy (RES) serves as an energy policy blueprint for the region through 2050. It established long term goals in eleven topic areas including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Using the strategies as guiding principles and taking into consideration the myriad of policy measures recommended across the energy topics, six early actions were identified to focus on in the near term. These include building retrofit programs, financing programs, energy savings at government buildings and in communities, land use and transportation strategies that reduce energy use and GHG emissions, electric vehicle and alternative fueling infrastructure, and use of reclaimed water. In 2014, a technical update of the RES was completed to inform development of San Diego Forward: The Regional Plan. This technical update demonstrates progress toward attaining the RES goals, updates existing conditions and future projections data, and recommends priorities for moving forward. The RES is not an adopted plan or policy document; rather it is a strategy framework that was accepted by the SANDAG Board of Directors. As such, it does not represent a state or local plan for renewable energy or energy efficiency. However, it is included here for completeness as it is a local resource focused on energy.

The Project would be designed to meet all applicable California Energy Code standards, which establish minimum standards related to various building features, including appliances, water and space heating and cooling equipment, building installation and roofing, and lighting. Energy to meet the Project's electricity demand would be provided by SDG&E, which is subject to meeting California's RPS. SDG&E is required to increase procurement from eligible renewable energy resources to 44 percent of retail sales by December 31, 2024; 52 percent of retail sales by December 31, 2027; and 60 percent of retail sales by December 31, 2030 (SDG&E 2018). The Project would also encourage reduced fuel consumption by providing shared transportation services, including scooters and bicycles, as

well as being located near public bus and trolley lines. Energy efficiency would also be inherent in the design of the Project. PODs are small, temporary lodging spaces that are intended to maximize space and energy efficiency. For these reasons, the Project would not conflict with or obstruct state or local plans for renewable energy or energy efficiency. Therefore, this impact would be **less than significant**.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. Geology and Soils.				
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☒	☐	☐
iv) 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 on- or off-site 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, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

3.7.1 Environmental Setting

The Geology and Soils environmental setting is summarized from the geotechnical investigation report (Appendix E) and the structural evaluation report prepared for the Project (GPI 2019; JLA 2019). These documents, along with publicly available information, are incorporated into this section. The Project site is located on the eastern edge of the former marshland of San Diego Bay which has been reclaimed for the construction of SDIA, with San Diego Bay now located approximately 2,800 feet south of the site (National Environmental Title Research 2021). The former mean

high tide line ran directly through the middle of the current Annex building in a southeast-northwest direction (District 2009).

The Project site consists of imported fill material of undocumented hydraulic origin and generally consists of relatively clean sands placed over bay deposits. Fill was imported from other sources for the upper elevations.

Undocumented artificial fills were encountered in the borings to depths of 3 to 10 feet below existing grades (GPI 2019). These artificial fills lie over Paralic Estuarine Deposits and Old Paralic Deposits (formerly referred to as Bay Point Formation). The Holocene-age Paralic Estuarine Deposits are bay deposits which were encountered in the western portion of the building. The upper 2 feet consisted of unconsolidated soft clays over loose to medium dense sands with interbedded silts. The underlying Pleistocene-age Old Paralic Deposits were encountered at depths ranging from 1-½ to 20 feet below existing grade and consist of layers of stiff to very stiff clays, very stiff claystone with varying degree of sand, and dense to very dense sandstone. Layers of conglomerate were encountered at a depth of approximately 32 feet.

The Project site is in a seismically active area and is likely to be subjected to strong ground shaking due to earthquakes on nearby faults. While there are no active faults or Alquist-Priolo (AP) Earthquake Fault Zones on the Project site, several trending active faults are located to in the project vicinity, including the Rose Canyon, Newport-Inglewood, Elsinore, and San Jacinto (GPI 2019, City of San Diego 2008b). The San Andreas fault is located north and northeast, and the Coronado Bank and San Diego Trough faults are located to the west and southwest. The most significant fault close to the Project is the Rose Canyon Fault which is approximately 400 feet northeast of the site across I-5 and is the closest active fault to the Project site (GPI 2019; USGS 2021).

3.7.2 Discussion

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)

Less-than-significant impact. The City of San Diego Safety Study, Geologic Hazards and Faults, Sheet 20, does not identify the Project site as being within Hazard Category 11 (Active, Alquist-Priolo Earthquake Fault Zone) (City of San Diego 2008b). The nearest Alquist-Priolo Earthquake Fault Zones (portions of the Rose Canyon Fault) are approximately 750 feet northeast of the project site and 1000 feet west of the site (GPI 2021). Ground rupture due to faulting is not a hazard for the Project because no active faults or AP Zones traverse the site. Therefore, the Project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault. A **less-than-significant** impact would occur, and no mitigation is required.

ii) Strong seismic ground shaking?

Less-than-significant impact with mitigation incorporated. As with most of the southern California region, the Project site would be subject to strong ground shaking in the event of a major earthquake. There are many active fault zones throughout the Southern California region, but the two closest fault zones that are most likely to result in a seismic event that would cause ground shaking include the Rose Canyon fault zone and the Coronado Bank fault zone. At its nearest point the Rose Canyon fault zone is located approximately 400 feet northeast of the site, and the Coronado Bank fault is approximately 11.7 miles west of the site. Additionally, the Project site is in Seismic Zone 4, which is a designation previously used in the Uniform Building Code to denote the areas of the highest risk to earthquake ground motion (California Seismic Safety Commission 2005).

The Project would redevelop the southern half of the existing Annex Building into a hotel. The one floor addition to the existing structure and extension of the one-story structure and extension of the roof to the west and south would require the installation of pile foundations to support the new structural loads. Construction of the Project would be subject to the most recent California Building Code (California Code of Regulations [CCR] Title 24) as well as mitigation measure GEO-1, which requires compliance with the recommendations contained in the Project-specific geotechnical investigation report (see Appendix E). Compliance with the California Building Code and mitigation measure GEO-1 would ensure the structural and foundational integrity of the redeveloped building and that the Project does not directly or indirectly result in substantial adverse effects related to seismic ground shaking. The geotechnical investigation report and its recommendations would be reviewed by the City of San Diego during the building permit process to determine conformity with City and State standards, which are designed to reduce potential impacts resulting from seismic conditions. Through compliance with the California Building Code and implementation of Mitigation Measure GEO-1, the Project's impact associated with strong seismic ground shaking would be **less than significant with mitigation**.

iii) Seismic-related ground failure, including liquefaction?

Less-than-significant impact with mitigation incorporated. Liquefaction is the phenomena associated with ground shaking that results in the increase of pore pressures within the soil. As the pore pressure increases, the shear strength of the soil is reduced. If the pore pressure is sufficiently increased, the soil takes on a "liquid like" behavior. Three key characteristics are required for liquefaction to occur: liquefaction-susceptible soils, sufficiently high groundwater, and strong shaking. Consequences commonly associated with soil liquefaction include ground settlements, surface manifestations (sand boils), loss of strength, possible lateral ground movement typically referred to as lateral spreading, ground oscillations and lurching, and possible ground failure.

The site is not located in a Seismic Hazard Zone for liquefaction as the area has not yet been mapped by the State of California. The City of San Diego Seismic Safety Study (City of San Diego 2008b) indicates that the site is in a geologic hazard category for a high potential of liquefaction (Geologic Hazard Category 31) due to shallow groundwater, major drainages, or hydraulic fills.

Soils susceptible to liquefaction generally consist of loose to medium dense sands and nonplastic silt deposits below the groundwater table. The soil deposits below groundwater which underly the Project site are composed of Holocene-age Paralic Estuarine Deposits and Pleistocene-age Old Paralic Deposits. Results of a liquefaction assessment for the Project site indicate that sandy portions of the Paralic Estuarine Deposits the which were encountered from depths of approximately 10 to 20 feet below existing grades at the western portion of the building and from depths of approximately 10 to 15 feet below existing grades near the center portion of the building are potentially liquefiable. The clayey Paralic Estuarine Deposits and the dense Old Paralic Deposits are not considered liquefiable (GPI 2019).

Should liquefaction of these layers occur, the estimated magnitude of induced settlement would be on the order of 1-inch at the western portion of the Annex Building and on the order of ½-inch near the center of the Annex Building. Differential settlement due to liquefaction across 40 feet could be on the order of ½-inch within these portions of building. Due to the Annex building being supported on pile foundations into dense soil below the depths of liquefaction, the depths and thicknesses of the liquefiable soils layers make foundation bearing failure under the existing structures unlikely in the event of liquefaction. Additionally, the Project would adhere to the recommendations in the geotechnical investigation report in compliance with Mitigation Measure GEO-1 and in accordance with the current California Building Code to account for potential effects related to liquefaction. Liquefaction settlement has the potential to cause minor distress to the slab-on-grade floor which is not a life-safety issue and would be repaired after the event. For these reasons, impacts associated with liquefaction and seismic related ground failure would be **less than significant with mitigation**.

iv) Landslides?

No impact. Landslides generally occur in areas that lack vegetation and have steep slopes. The City of San Diego Safety Study, Geologic Hazards and Faults, does not identify the Project site as being within Hazard Category 21

(confirmed, known, or highly suspected landslide) or Hazard Category 22 (possible or conjectured landslide) (City of San Diego 2008b). In addition, no existing landslide areas are located adjacent to the Project site. Based on the relatively flat topography of the Project site, landslides are not anticipated to occur on or surrounding the Project. Therefore, **no impact** would occur with construction or operation of the Project. No mitigation is required.

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

Less-than-significant impact. Construction of the Project would involve grading, excavation, micro piledriving, and other standard construction practices that could cause soil erosion or the loss of topsoil. However, the Project would be required to comply with the best management practices (BMPs) contained within the Stormwater Pollution Prevention Plan (SWPPP) developed for the Project. The development and implementation of the SWPPP would be a requirement of the National Pollutant Discharge Elimination System (NDPES) permit issued by the San Diego Regional Water Quality Control Board (RWQCB). The SWPPP would identify the BMPs needed to properly control erosion and siltation impacts during construction activities. For a complete analysis and discussion of the required stormwater measures, see Section 3.10, Hydrology and Water Quality.

During operation of the hotel, only landscaped areas would have exposed soil while the rest of the Project site would be developed with structures or pavement. The landscaped areas would be planted with drought tolerant plant species and shade trees which would limit the amount of exposed soil. Furthermore, a storm water treatment basin would be constructed at the southern end of the proposed parking lot and would include a depressed surface area to retain and filter storm water and help reduce erosion-related impacts. Drought tolerant plant species would be installed in the storm water treatment basin to reduce the amount of exposed soil. In addition, permanent BMPs identified in the Storm Water Quality Management Plan (SWQMP) developed for the Project would be installed to prevent loss of on-site soils (see Section 3.10, Hydrology and Water Quality, for more information on the SWQMP). With implementation of the SWQMP and the SWPPP, and the requirements identified in the Project's NDPES permit, soil erosion-related impacts during construction and operation of the Project would be **less than significant**. No mitigation is required.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less-than-significant impact with mitigation incorporated. Refer to responses a) i — iv above. Landslides are not considered to be a hazard at the Project site. Although the Project site is located on Paralic Estuarine Deposits that are subject to liquefaction, the estimated magnitude of total settlement is small and the potential for associated lateral spreading and collapse is negligible. The Project would adhere to the recommendations in the geotechnical investigation report in compliance with mitigation measure GEO-1 and in accordance with the current California Building Code to account for potential adverse effects related to unstable soils including subsidence and liquefaction. For example, mitigation measure GEO-1 would require pile foundations to support the roof deck extension and potentially portions of the redeveloped building. The pile foundations would mitigate impacts associated with potentially liquefiable soils at the site. With implementation of Mitigation Measure GEO-1, the Project would be supported on deep foundations and would only be subject to approximately 1 inch of liquefaction, therefore, there would be no life-safety concern. The minor settlement could either be addressed by an engineered structural floor slab or repairs to the floor slab could be performed. This impact would be **less than significant with mitigation**.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect 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 or, conversely, a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures that have been built on the soil. The Project site is underlain by fill materials, and Paralic Estuarine Deposits and Old Paralic Deposits below the fill materials. The fill materials encountered from depths of approximately 0 to 10 feet consist predominantly of silty sands with thinner layers of sandy silts both of which have a very low expansion

potential (GPI 2021). A layer of soft fat clay approximately 10 feet below the fill material and 2 feet thick is present at the west side of the building. This soil type possesses very high compressibility characteristics. However, given how thin the fat clay layer is and that it is beneath 10 feet of soils with very low expansion potential, it is not anticipated cause substantial direct or indirect risks to life or property. Expansive soils are not present near the ground surface of the Project site, and the silty and sandy soils that were encountered are not expansive. The direct or indirect risks to life or property from expansive soils would be **less than significant** and no mitigation is required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No impact. The Project would connect to the existing sewer system and would not require the construction or operation of septic tanks or alternative wastewater disposal systems. As such, the Project would not result in impacts regarding inadequate soils to support septic systems. ***No impact*** would occur. No mitigation is required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less-than-significant impact. The Project site rests on artificial fill underlain by Paralic Estuarine Deposits and Old Paralic Deposits, which is a near-shore sedimentary deposit that dates from the middle to late Pleistocene, roughly 600,000 to 10,000 years ago. No known geologic features are present on the Project site, therefore no impact on unique geological features would occur.

Paralic Estuarine Deposits and Old Paralic Deposits were encountered on the Project site at depths ranging from 1-½ to 20 feet below existing grade. Paralic Estuarine Deposits and Old Paralic Deposits (formerly known as the Bay Point Formation) are assigned high resource sensitivity by the City of San Diego due to a variety of invertebrate and vertebrate fossils that have been previously found in the deposit (CGS 1975). The City of San Diego's CEQA Significance Determination Thresholds state that the potential significant impacts on Paralic Estuarine Deposits and Old Paralic Deposits could occur if Project-related activities reach depths greater than 10 feet and remove more than 1,000 cubic yards of soil (City of San Diego 2016a). However, based on the Paleontological Monitoring Determination Matrix monitoring is not required when grading on documented or undocumented artificial fill.

Project construction would require up to 6,000 square feet of excavation to install the storm water treatment basin and utilities. Construction activity would include trenching throughout the Project site for domestic and irrigation water lines, sewer lines, and dry utilities, including electrical, gas, cable, and phone lines. There would be up to 400 feet of trenching, approximately 2 feet deep, and excavation would reach depths of up to 10 feet. It is anticipated that up to 400 cubic yards of fill would be needed for backfilling. Project-related excavation activities would not trigger the City of San Diego's CEQA Significance Determination Thresholds because excavation would not surpass 10 feet in depth and would not remove more than 1,000 cubic yards of soil. Therefore, construction of the Project is not anticipated to adversely affect fossil sensitive soil deposits, and no paleontological monitoring is required. For these reasons, the Project would have a **less-than-significant** impact on paleontological resources, and no mitigation is required.

REQUIRED MITIGATION MEASURES

The following mitigation measure would reduce the potentially significant impacts related to geology and soils.

GEO-1: Compliance with Recommendations of the Geotechnical Study

Seismic Considerations

- A Site Class D is recommended for the site in accordance with the 2019 California Building Code.
- During a design earthquake, liquefaction induced settlement may occur in the western portion of the building extending to near the center of the building. Liquefaction induced settlements are estimated to be 1-inch or less.
- Differential settlement due to liquefaction across 40 feet could be on the order of ½ inch within the building.

Earthwork

- Removal/replacement of existing undocumented soils is recommended for new foundations.
- New footings along the eastern building wall may be extended into competent, natural formational material.
- Excavations and shoring systems should meet the minimum requirements given in the most current State of California Occupational Safety and Health Standards.
- Subgrade soils should be scarified to a depth of 8 inches, moisture-conditioned, and compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557.
- Fill soils should be placed in horizontal lifts, moisture-conditioned, and mechanically compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557.
- Fills consisting of the on-site or imported sandy soils should be placed at a moisture content over the optimum moisture content.
- Moisture should be maintained in fill prior to placing new fill or at the subgrade surfaces or additional processing may be required.
- Imported fill material should be predominately granular and non-expansive.
- The on-site inert demolition debris when crushed to the consistency of aggregate base may be reused in the compacted fills provided approval is provided by the reviewing regulatory agency and the owner.
- A representative of the Geotechnical Engineer should observe excavations, subgrade preparation, and fill placement activities.
- Sufficient in-place field density tests should be performed during fill placement and in-place compaction to evaluate the overall compaction of the soils.
- Soils that do not meet minimum compaction requirements should be reworked and tested prior to placement of any additional fill.

Pile Foundations

- Piles will be required to support the building either for the foundations supporting the roof deck extension and if the retrofit of the existing foundations as part of the building renovation indicate that additional axial support is required at selected columns except along the east wall.
- The pile foundations will mitigate against the potentially liquefiable soils at the site.
- Additional piles, if required, are recommended to be extended into the dense to very dense sandstone.
- Foundation contractor should be prepared for a range of drilling conditions, including shallow groundwater and caving soils.
- A representative of the Geotechnical Engineer should continuously observe the installation of the piles at the site.
- The final pile design for additional piles to retrofit the existing foundations should be reviewed by the Geotechnical Engineer.

Shallow Foundations

- Minor structures not attached to the existing building such as site walls, small retaining walls, and trash enclosures with relatively light structural loads may be supported on shallow footings.
- Continuous footings or isolated column footings for structures should be supported on engineered fill or competent formational material.
- Soil resistance to lateral loads may use a combination of frictional resistance between the bottom of footings and underlying soils or aggregate base material and by passive soil pressures acting against the embedded sides of the footings without a reduction.

- A representative of the Geotechnical Engineer should observe and approve all footing excavations prior to placement of concrete and steel.
- Foundation concrete should conform to the requirements for negligible sulfate exposure for soil (Category S0) as outlined in ACI 318, Section 4.3.

Floor Slabs

- Repairs to the existing slab-on-grade floors, if required, should be supported on properly compacted, sandy non-expansive soils.
- A structurally reinforced floor slab will be required if the risk of liquefaction settlement to cause distress to the existing slab-on-grade floor in the center and eastern portion of the building is not acceptable.
- A moisture vapor retarder should be placed under slabs that are to be covered with moisture-sensitive floor coverings (wood, vinyl, tile, etc.).

Retaining Walls

- Non-expansive, imported or on-site, granular soils is recommended to be used as wall backfill.
- Active earth pressures can be used for designing walls that can yield at least 1 inch laterally in 10 feet of wall height under the imposed loads.
- At-rest pressures should be used for restrained walls that remain rigid enough to be essentially non-yielding.
- An additional lateral earth pressure should be added to the above active pressures for walls greater than 6 feet high to account for seismic loads.
- Walls subject to surcharge loads should be designed for an additional uniform lateral pressure based on the anticipated surcharge pressure.
- Wall backfill should be well-drained to relieve possible hydrostatic pressure or designed to withstand these pressures.

Storm Water Infiltration and Drainage

- Surface infiltration of storm water is not recommended at the site since the soils above the hard silts and clays consist of existing fills and potentially liquefiable soils.
- Positive surface gradients should be provided adjacent to structures so as to direct surface water run-off and roof drainage away from foundations and slabs
- Long-term ponding of surface water should not be allowed on pavements or adjacent to buildings.

Flatwork and Pavements

- Exterior concrete and masonry flatwork should be supported on non-expansive, compacted fill.
- The use of the clayey soils within 2 feet of the flatwork subgrade should not be permitted unless differential heave is tolerable.
- Modifications of the parking lot may be consist of a pavement section of asphalt concrete over of aggregate base or portland cement concrete (PCC) over compacted subgrade.
- Aggregate base should conform to the requirements of California Department of Transportation Standard Specifications or the Standard Specifications for Public Works Construction (Green Book) for untreated base materials.
- The design of paved areas should incorporate measures to prevent moisture build-up within the base course which can otherwise lead to premature pavement failure.

3.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. Greenhouse Gas Emissions.				
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?	☐	☐	☒	☐

3.8.1 Environmental Setting

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. Solar radiation enters the earth's atmosphere from space. Most solar radiation passes through GHGs; however, infrared radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on earth.

Prominent GHGs contributing to the greenhouse effect are CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. GHG emissions contributing to global climate change are attributable, in large part, to human activities associated with on-road and off-road transportation, industrial/manufacturing, electricity generation by utilities and consumption by end users, residential and commercial on-site fuel usage, and agriculture and forestry. It is "extremely likely" that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in GHG concentrations and other anthropogenic forcing together (IPCC 2014: 5).

Climate change is a global problem. GHGs are global pollutants because even local GHG emissions contribute to global impacts. GHGs have long atmospheric lifetimes (one to several thousand years) and persist in the atmosphere long enough to be dispersed around the globe. Although the lifetime of any particular GHG molecule is dependent on multiple variables and cannot be determined with any certainty, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration (IPCC 2013:467).The three primary GHGs discussed when quantifying GHG emissions in the context of climate change include CO_2, CH_4, and N_2O. Emissions of these gases are converted to a comparable unit by multiplying each non-CO_2 gas by their global warming potential (GWP), reporting emissions in terms of carbon dioxide equivalent (CO_2e). These equivalencies are typically represented as million metric tons of CO_2e ($MMTCO_2e$) and metric tons of CO_2e ($MTCO_2e$). CH_4, for example, with a GWP of 25 based on the Intergovernmental Panel on Climate Change Fourth Assessment Report, can trap 25 times as much heat in the atmosphere as the same quantity of CO_2, thus the heat trapped in the atmosphere by one metric ton (MT) of CH_4 is equivalent to that trapped by 25 metric tons of CO_2 or 25 $MTCO_2e$. This conversion to CO_2e allows consideration of all gases in comparable terms and makes it easier to communicate how various sources and types of GHG emissions contribute to global climate change.

GHG inventories provide a detailed accounting of the sources and quantities of GHG emissions generated from activities. For example, at the State level, CARB prepares regular GHG inventories for a defined set of gases that contribute to climate change. In 2014, the statewide total quantity of GHGs emitted was 443 $MMTCO_2e$ (CARB 2014). At the local level, total GHG emissions in unincorporated San Diego county during 2014 were 3.2 $MMTCO_2e$ (County of San Diego 2014).

3.8.2 Discussion

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

Less-than-significant impact. The issue of global climate change is inherently a cumulative issue, because the GHG emissions of an individual project cannot be shown to have a material effect on global climate. Thus, the level of GHG emissions associated with implementation of the project is addressed as a cumulative impact.

The State CEQA Guidelines require lead agencies to describe, calculate, or estimate the amount of GHG emissions that would result from a project, and emphasize the necessity to determine potential climate change effects of a project and propose mitigation, as necessary. The Guidelines do not recommend a specific analysis methodology or quantitative criteria for determining the significance of GHG emissions. However, the Guidelines affirm the discretion of lead agencies to determine appropriate significance thresholds.

The District has not established quantitative significance thresholds for evaluating GHG emissions. The California Air Pollution Control Officers Association (CAPCOA) presented a 900 $MTCO_2e$ per year threshold in a white paper *titled CEQA and Climate Change* (CAPCOA 2008). This threshold was developed based on various land use densities and discretionary project types that were analyzed to determine the size of projects that would likely have a less than cumulatively considerable contribution to climate change. Projects that meet or fall below the CAPCOA 900 $MTCO_2e$ threshold are expected to result in GHG emissions that would not result in a cumulatively considerable impact.

When compared to similar mass emissions thresholds adopted by other regional air districts in California, the CAPCOA 900 $MTCO_2e$ per year threshold is relatively conservative and can be used to support cumulative impact determination beyond 2020. Additionally, in April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated CEQA significance thresholds and determined that projects estimated to generate less than 1,100 $MTCO_2e$ per year would not result in a significant cumulative impact. This threshold was developed to demonstrate compliance with the statewide 2030 GHG reduction targets, and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions. Therefore, the CAPCOA threshold of 900 $MTCO_2e$ per year represents a more stringent threshold than has been approved by other air districts in compliance with 2030 statewide reduction targets.

The Project's construction-related and operational GHG emissions were modeled based on Project specifications and default settings and parameters contained in the CalEEMod Version 2016.3.2 (CAPCOA 2016). Refer to Appendix B for specific input parameters and modeling output results. Construction activities related to the proposed Project that would result in the generation of GHG emissions include the use of heavy-duty off-road construction equipment and vehicle use during worker commute trips. Modeled construction phases included site preparation, demolition, grading, paving, and building construction. CalEEMod results indicated that construction-related activity would result in an estimated total emissions of 2,150 $MTCO_2e$ over the entire construction period. When assessing construction-related GHG emissions over the lifetime of the Project, an amortization period of 30 years is recommended as an estimate of equivalent annual emissions (SCAQMD 2008). The amortized construction emissions can then be presented and addressed as part of the Project's operational GHG emissions.

Operational sources of GHG emissions would include employee and guest vehicles (mobile), GHGs associated with production of energy consumed (energy), water and wastewater treatment (water), and waste processing (waste). Additionally, stationary sources such as emergency backup generators and fire pumps would also result in operational GHG emissions. Estimated operational GHG emissions would be approximately 774 $MTCO_2e$ per year, and when combined with the 30-year amortized construction emissions of approximately 72 $MTCO_2e$ per year, the total annual operational GHG emissions would be approximately 846 $MTCO_2e$ per year. Therefore, Project-related GHG emissions would not exceed the 900 $MTCO_2e$ per year threshold of significance. This impact would be **less-than-significant**, and no mitigation would be required.

Table 3.8-1 Estimated Construction and Operational GHG Emissions

Source Type	Annual GHGs ($MTCO_2e$)
Construction	*2,150*
Amortized Construction	72
Operations	774
Total	**846**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent

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

Less-than-significant impact. Reducing GHG emissions in California has been the focus of the State government for approximately two decades (CARB 2020). GHG emission targets established by the State legislature include reducing statewide GHG emissions to 1990 levels by 2020 (AB 32 of 2006) and reducing them to 40 percent below 1990 levels by 2030 (SB 32 of 2016). Executive Order (EO) S-3-05 calls for statewide GHG emissions to be reduced to 80 percent below 1990 levels by 2050. EO B-55-18 calls for California to achieve carbon neutrality no later than 2045 and achieve and maintain net negative GHG emissions thereafter. These targets align with the scientifically established levels needed globally to limit the rise in global temperature to no more than 2 degrees Celsius, the warming threshold at which major climate disruptions, such as super droughts and rising sea levels, are projected. These targets also align with efforts to limit the temperature increase even further to 1.5 degrees Celsius (UN 2015:3).

The 2017 Climate Change Scoping Plan, prepared by CARB, outlines the main strategies California shall implement to achieve the legislated GHG emission target for 2030 and "substantially advance toward our 2050 climate goals" (CARB 2017:1, 3, 5, 20, 25–26). It identifies the reductions needed by each GHG emission sector including transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste. The State has also passed more detailed legislation addressing GHG emissions associated with industrial sources, transportation, electricity generation, and energy consumption. CARB and other agencies are charged with implementing regulations that achieve the reduction goals on a statewide basis, including through increased building efficiency (through CBC updates) and vehicle efficiency (through truck and car rulemaking), among other things. Those statewide regulations apply to ensure local construction and operation increase efficiencies toward achievement of statewide GHG emissions reduction goals.

The Port of San Diego Climate Action Plan (CAP) was adopted in December 2013 and includes an inventory of existing (2006) and projected emissions in 2020, 2035, and 2050, as well as strategies to meet the District's goal of reducing annual GHG emissions to 25 percent below 2006 levels by 2035 (District 2013). To achieve the Port's goals, the CAP details various GHG reduction measures related to transportation and land use, alternative energy generation, energy conservation, waste reduction and recycling, water conservation, and recycling. These GHG reduction strategies and measures included in the CAP support meeting the statewide goals set forth in AB 32.

The Port's CAP meets the criteria within State CEQA Guidelines Section 15183.5 of the CEQA Guidelines by providing reduction targets that align with statewide goals. A critical aspect of having a CAP that fits the criteria within State CEQA Guidelines Section 15183.5 is having reduction targets that align with statewide goals. Because the Port's reduction targets outlined in the CAP parallel the State's commitment in AB 32, and aligns with statewide goals to reduce GHG emissions, the CAP is consistent with AB 32. While the Port's CAP includes a long-term 2035 goal, it does not include post-2020 reduction quantification. Therefore, the CAP cannot be used as a qualified plan for reduction of GHG emissions pursuant to Section 15183.5 of the CEQA Guidelines for projects with a post-2020 buildout date. Because the Project is not expected to be operational until 2024, the CAP is not used to assess the significance of the Project's GHG emissions, which were quantified in Section 3.8.2(a).

The 2017 Scoping Plan and the District's Climate Action Plan are the most applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Plans, policies, and regulations adopted for the purpose of reducing GHG emissions were developed with the intent of reducing cumulative emissions related, primarily, to long-

term operational emissions. As described previously, the Project would not result in a considerable increase in GHG emissions during operations nor as a result of construction activities. Additionally, specific features of the Project are designed to reduce GHG emissions, including proximity to public transit and the nature of PODs, which are designed as small, temporary lodging spaces intended to maximize space and energy efficiency. The District's CAP includes policies and measures related to reducing GHG emissions in the following categories: Transportation and Land Use Planning, Energy Conservation and Efficiency, Water Conservation and Recycling, Alternative Energy Generation and Waste Reduction and Recycling. The Project's features that encourage alternative modes of transportation and maximize space and energy efficiency would advance the District's CAP goals. The Project would not impede the District's ability to implement the CAP. In addition, the Project would be consistent with the GHG reduction goals and efficiency requirements of statewide planning efforts. Thus, the Project would not conflict with any applicable plan, policy, or regulation adopting for the purpose of reducing emissions of GHGs. This impact would be **less-than-significant**, and no mitigation is required.

3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials.				
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/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

3.9.1 Environmental Setting

The State Water Resources Control Board's (SWRCB) GeoTracker website along with the California Department of Toxic Substances Control's (DTSC) Envirostor website provide a comprehensive list of the facilities and sites identified as meeting the "Cortese List" requirements pursuant to Government Code Section 65962.5 (CalEPA n.d.). The SWRCB Geotracker website provides data relating to leaking underground storage tanks and other types of soil and groundwater contamination, along with associated cleanup activities. While no hazardous materials sites were identified on or immediately adjacent to the Project site through this database, seven closed leaking underground storage tanks (LUSTs), two closed cleanup sites, and one open cleanup site were identified within 1,000 feet of the Project site (SWRCB 2021a). Cleanup has been completed for all hazardous materials sites within 1,000 feet of the Project with the exception of the Northside San Diego International Airport Redevelopment (Former General

Dynamics Facility) site, located approximately 800 feet northwest of the Project site, on the other side of Pacific Highway. This site was the former General Dynamics Convair Division facility, and between 1935 and 1995, General Dynamics and its predecessors (including Consolidated Aircraft Company, Consolidated Vultee Aircraft Company, and Convair) performed aircraft and aerospace manufacturing activities at the facility. Chemicals of concern (COCs) used at the site included fuels, oils, solvents, acids, metals, paints, and polychlorinated biphenyls (PCBs). Before plant decommissioning COCs were found in soil and groundwater. Recent soil and groundwater investigations encountered COCs in soil and groundwater. The San Diego Regional Airport Authority plans to redevelop the site for airport-related businesses and is conducting additional investigations to assess the potential risk relative to the new site use (SWRCB 2021b). Table 3.9-1 provides a summary of the hazardous materials sites located within 1,000 feet of the Project site that were identified on GeoTracker.

Table 3.9-1 Hazardous Materials Sites

Hazardous Material Site Name	Type	Cleanup Status	Potential Contaminants of Concern	Potential Media of Concern
Northside San Diego International Airport Redevelopment (Former General Dynamics Facility)	Cleanup Program Site	Open - Site Assessment as of 9/23/2010	Chromium, Polychlorinated Biphenyls (PCBS)	Indoor Air, Other Groundwater (Uses Other Than Drinking Water), Sediments, Soil, Soil Vapor, Surface Water
General Dynamics/Electronics	Cleanup Program Site	Completed - Case Closed as of 5/29/1992	None Specified	Soil
Execair Maintenance Inc.	Cleanup Program Site	Completed - Case Closed as of 3/12/2007	None Specified	None Specified
Former General Dynamics Lindberg Field Plant	Lust Cleanup Site	Completed - Case Closed as of 7/17/2014	Heating Oil / Fuel Oil	Other Groundwater (Uses Other Than Drinking Water), Soil
Execair Maintenance Inc.	Lust Cleanup Site	Completed - Case Closed as of 6/7/1995	Gasoline	Soil
Southwest Car Rental	Lust Cleanup Site	Completed - Case Closed as of 5/1/1991	Waste Oil / Motor / Hydraulic / Lubricating	Soil
Jones Family Trust	Lust Cleanup Site	Completed - Case Closed as of 9/19/1996	None Specified	None Specified
Alamo Rent A Car	Lust Cleanup Site	Completed - Case Closed as of 5/28/1993	Waste Oil / Motor / Hydraulic / Lubricating	Soil
Alamo Rent A Car	Lust Cleanup Site	Completed - Case Closed as of 1/2/2008	Diesel	Soil
Alamo Rent A Car	Lust Cleanup Site	Completed - Case Closed as of 9/1/1988	Gasoline	Soil

Sources: SWRCB 2021a

The DTSC Envirostor website provides data related to hazardous materials spills and clean ups. The only hazardous materials site identified on Envirostor within 1,000 feet of the Project site was the Former General Dynamics Lindbergh Field Plant previously identified on the GeoTracker database, as shown in Table 3.9-1 (DTSC 2021a, SWRCB 2021a). Cleanup activities occurred on the site and the site was closed as of 2014 (SWRCB 2021a). A microbial investigation of the southern half of the Annex Building was conducted by ECS Environmental in 2016. Laboratory results from the investigation indicated that highly elevated mold spore counts (Stachybotrys, Aspergillus/Penicillium, Cladosporium, Ascospores) were present in the southern half of the Annex Building (ECS Environmental 2017a). Remediation to remove mold spores was conducted in 2017, and ECS Environmental determined that remediation was successful, and the building could be reoccupied (ECS Environmental 2017b).

The closest school to the Project site is the Montessori School of San Diego, located 0.2 mile to the northeast, east of I-5. The closest public school to the Project site is Washington Elementary School, located 0.9 mile to the southeast.

SDIA is located immediately west of the Project site across Pacific Highway. The Airport Land Use Compatibility Plan (ALUCP) prepared for SDIA identifies Airport Influence Areas (AIAs) in which current and projected future airport-related noise, safety, airspace protection, or overflight factors/layers may significantly affect land use or necessitate restrictions on land use (SDCAA 2014). The Project site is within the AIA for SDIA, in Review Area 1 (SDCAA 2014: Exhibit 1-1). Review Area 1 is defined by the combination of the 60 decibels (dB) Community Noise Equivalent Level (CNEL) noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces (TSSs). All policies and standards of the ALUCP apply within Review Area 1 and would apply to the development of the Project site.

The District uses two emergency response plans to prepare for potential emergencies on its tidelands: the Emergency Operations Plan (EOP) and the 2016 Port of San Diego Maritime Emergency Restoration Plan. EOP is used by the District to outline actions that would be taken by the District and associated agencies during an emergency including when the Emergency Operations Center would be activated and provides an overview of hazards and risks that may occur on District lands (District and County of San Diego 2018). The 2016 Port of San Diego Maritime Emergency Restoration Plan outlines the processes for re-opening the District following its official closure or partial closure by the U.S. Coast Guard Port Captain due to an imminent threat, sustained threat, or disaster (District 2020b).

The Project site lies within the 65-dB CNEL noise contour of the SDIA as presented in the ALUCP (San Diego County Regional Airport Authority 2014). This means that the level of noise directly attributed to aircraft activity is greater than 65 dB CNEL at the Project site. According to the California Airport Noise Standards in Title 21 of the California Code of Regulations, the 60-dB CNEL is considered the boundary for the acceptable level of aircraft noise for noise-sensitive land uses such as residential areas. Normal aircraft operations at the airport are limited by a curfew from 11:30 p.m. to 6:3r0 a.m., which restricts departures.

The Project site is also located 2.25 miles northeast of Naval Air Station North Island (NASNI), approximately 7,500 feet from its 65-dB CNEL noise contour (U.S. Navy 2011), and thus outside of the zone of influence of this air station.

3.9.2 Discussion

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 Project would redevelop the southern half of the existing Annex Building into a hotel. Construction would involve grading, excavation, micro piledriving, and other standard construction practices. Heavy equipment used during construction of the Project would require the use of oil, diesel fuel, gasoline, hydraulic fluid, and other liquid materials that would be considered hazardous if improperly stored or handled. In addition, materials such as paints, roofing materials, solvents, and other substances typically used in building construction would be located on the Project site during construction. Operation of the hotel would involve the use of common household hazardous materials such cleaning products.

The Project applicant would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials during construction and operation. Specifically, the Project would be required to comply with the California Environmental Protection Agency's Unified Program, which protects Californians from hazardous waste and hazardous materials by ensuring consistency throughout the state regarding the implementation of administrative requirements, permits, inspections, and enforcement at the local regulatory level. Regulated activities would be managed by the San Diego County Environmental Health and Quality Department, which is the designated Certified Unified Program Agency, and in accordance with the regulations included in the Unified Program (e.g., hazardous materials release response plans and inventories, California Uniform Fire Code hazardous material management plans and inventories). Furthermore, the Department of Transportation Hazardous Materials Regulations cover all aspects of hazardous materials handling and transportation. Parts 130 (Oil Spill Prevention and Response) and 172 (Emergency Response) would apply to Project construction activities. Compliance with applicable regulations would reduce the potential for accidental release of hazardous materials during Project construction and operation.

The Project would be required to comply with existing laws and regulations regarding the transportation, use, and disposal of hazardous materials. These regulations are specifically designed to protect the public health and the environment and must be adhered to during Project construction and operation. Compliance with applicable regulations would ensure that this impact would be **less than significant**, and no mitigation is required.

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

Less-than-significant impact. As discussed above under response a), typical hazardous materials would be used during construction of the Project, including fuels, solvents, paints, oils, and grease. It is possible that these materials could be released during construction activities. However, compliance with federal, state, and local regulations, in combination with the construction BMPs that are a part of the SWPPP and designed to regulate runoff, discussed in more detail in Section 3.10, Hydrology and Water Quality, would ensure that hazardous materials would be used, stored, and disposed of properly.

Asbestos and lead may be present within the existing Annex Building. As standard practice, tests would be conducted during the demolition of the existing structure, and any hazardous materials, such as lead and asbestos-containing materials, would be handled and disposed of according to all applicable regulations. Compliance with all applicable federal, state, and local laws and regulations pertaining to asbestos management and lead abatement would ensure that any potential asbestos or lead would be properly handled and disposed. The Occupational Safety and Health Administration (OSHA) requires the removal of asbestos containing material with an asbestos fiber content of more than 0.1 percent and 100 square feet or more of surface area to be completed by a Certified Asbestos Consultant. To certify as an asbestos consultant, contractors must meet several requirements including undergoing asbestos training and having a certified supervisor on staff who has experience managing asbestos removal (California Department of Industrial Relations n.d.). The permissible exposure limits, exposure assessments, and monitoring of asbestos removal are also regulated (40 CFR 40 §1926) which is enforced by the SDAPCD (Regulation XI, Subpart M – Rule 361.145 and 361.150). The rule requires the owner or operator of a demolition to notify the SDAPCD at least 10 days prior to demolishing any structure containing asbestos.

Dewatering during construction may be required during excavation activities (GPI 2019). Should groundwater be encountered during Project construction, testing would occur in accordance with DTSC and RWQCB requirements before dewatering activities. If dewatering activities are needed, they would include the potential use of Baker tanks and/or filtration bags, for example, if needed to treat dewatered groundwater before discharge into the stormwater system and/or sewer system.

Building design would be required to comply with all applicable Fire, Building, and Health and Safety codes, which would eliminate any potential risk of upset. No hazardous materials, other than household cleaning and maintenance products, would be used or stored on the Project site during operation of the hotel. Upset and accident conditions involving these materials are not reasonably foreseeable as they would be used, stored, and disposed of in accordance with manufacturer's instructions and applicable regulations. The potential impact during both construction and operation would be **less than significant**. No mitigation is required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less-than-significant impact. The Montessori School of San Diego is located 0.2 mile to the northeast of the Project site, on the east side of I-5. While this school is less than a quarter mile from the Project, I-5 and several commercial buildings separate the Project site from the school. As discussed above in response a), hazardous materials associated with construction would be limited to those needed to operate construction equipment, and hazardous materials associated with operation would be limited to typical household hazardous materials such as cleaning products. It is unlikely that hazardous materials associated with the Project would affect the Montessori School of San Diego given the types of hazardous materials associated with the Project, the distance between the school and the Project site, and the fact that I-5 along with several commercial buildings separate the Project from the school.

Furthermore, the Project would be required to comply with relevant federal, State, and local regulations that require strict adherence to guidelines regarding the safe use, transportation, and disposal of hazardous materials as well as ensuring the reduction of the potential for humans or the environment to be affected by an accidental release of hazardous materials. Because such laws are established to be protective of human health and the environment, compliance with applicable regulations is sufficient to ensure that any hazardous materials used during Project implementation would not result in hazardous emissions within one-quarter mile of the Montessori School of San Diego or any other schools in the area. Impacts would be **less than significant** and no mitigation is required.

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

Less-than-significant impact. As discussed above, review of the GeoTracker and Envirostor databases determined that no designated hazardous materials sites are located on the Project site. Hazardous materials sites were identified within 1,000 feet of the Project including seven closed LUSTs, two closed cleanup sites, and one open cleanup site (SWRCB 2021a). All of these identified hazardous materials sites have a "completed- case closed" status with the exception of the Northside San Diego International Airport Redevelopment (Former General Dynamics Facility) site. Hazardous materials sites with the "completed-case closed" status have undergone corrective action and any remaining petroleum constituents from the release are considered to be low threat to human health, safety, and the environment. The RWQCB submitted a closure letter or other formal closure decision document for each closed site indicating the closure and completion of cleanup activities (SWRCB n.d.).

The Northside San Diego International Airport Redevelopment (Former General Dynamics Facility) site is an open cleanup site currently being investigated by the San Diego Regional Airport Authority to assess the potential risk of redeveloping the site for airport-related businesses. Potential COCs on the site include chromium and PCBs from previous aircraft and aerospace manufacturing activities. These COCs may have impacted the indoor air, non-drinking groundwater, sediments, soil, soil vapor, and surface water surrounding the Former General Dynamics Facility (SWRCB 2021b). One hazardous materials site is 800 feet northwest of the Project site and separated from the Project site by Pacific Highway. No Project related construction or operation activities would occur on the site, which is a Former General Dynamics Facility, that could cause a significant hazard to the public or environment. Dewatering during construction may be required during excavation activities (GPI 2019). Should groundwater be encountered during Project construction, testing would occur in accordance with DTSC and RWQCB requirements before dewatering activities. If dewatering activities are needed, they would include the potential use of Baker tanks and/or filtration bags, for example, if needed to treat dewatered groundwater before discharge into the stormwater system and/or sewer system.

All of the other surrounding identified hazardous materials sites have a "completed-case closed" status indicating that any remaining hazardous materials would be considered a low threat to human health, safety, and the environment (SWRCB 2021a; SWRCB n.d.). Furthermore, no designated hazardous materials sites are on the Project site. For these reasons, implementation of the Project would not create a significant hazard to the public or the environment due to being located on a hazardous materials site, and impacts would be **less than significant**. No mitigation is required.

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

Less-than-significant impact. SDIA is located immediately west of the Project site across Pacific Highway. The Project site is located within the SDIA 65-dB CNEL noise contour and is approximately 7,500 feet outside the 65 CNEL contour of NASNI. The Project site is within Review Area 1 of the ALUCP developed for SDIA (SDCAA 2014: Exhibit 1-1). Review Area 1 is defined by the combination of the 60 dB CNEL noise contour, the outer boundary of all safety zones, and the airspace TSSs. All policies and standards of the ALUCP apply within Review Area 1 and would apply to

the development of the Project site. ALUCP review is required for land use plans and regulations within Review Area 1 proposing increases in height limits and for land use projects that:

- Have received from the Federal Aviation Administration (FAA) a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements; and/or
- Would create a glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plume, or bird attractant hazard.

During Project construction, the tallest features would be the construction cranes, which would have a maximum height of 100 feet above ground level. The tallest feature associated with operation of the Project would be the hotel building, which would have a height of 50 feet.

Information regarding the Project's hotel building was submitted to the FAA for review on January 14, 2021 and the FAA requested additional information on the cranes to be used during construction on January 15, 2021. Determinations of No Hazard for the Project building and the construction cranes were sent from the FAA on January 27, 2021 and March 4, 2021, respectively (FAA 2021a, FAA 2021b). The aeronautical study conducted by the FAA which led to the Determinations of No Hazard indicates that the Project building and construction cranes would not exceed obstruction standards and would not be a hazard to air navigation. The Project applicant would be required to file FAA Form 7460-2, Notice of Actual Construction or Alteration with the FAA within 5 days after the construction reaches its greatest height. Furthermore, the FAA determined that marking and lighting of the hotel building would not be necessary for aviation safety. The Project design would involve using paint to display "STAY OPEN" on the roof for approaching airplane visibility. The paint color and size would be in accordance with FAA Advisory circular 70/7460-1 M as required by the Determination of No Hazard for the Project building (FAA 2021a; FAA 2020).

The Project applicant submitted an ALUC consistency review application which included the FAA Determinations of No Hazard to Air Navigation. On May 13, 2021, the ALUC sent a consistency determination to the Project applicant indicating the Project is consistent with the SDIA's ALUCP (San Diego County Regional Airport Authority 2021).

The Project would redevelop the southern half of the existing Annex Building to construct the hotel. An additional floor would be constructed over the existing roof, and the building would increase in height by 32 feet for a total building height of 50 feet tall. This redeveloped structure would be similar in height to existing structures in the surrounding area. Additionally, the District's Administration Building is directly adjacent to the Project site and is 111 feet tall, approximately twice as tall as the Project (WM. Templeton Johnson Architect 1943). Consequently, the Project does not include project design features that would create safety hazards for people residing or working in the area, or for future guests of the hotel.

Aircraft arriving at and departing from both airports would be audible at the Project site, the noise levels from aircraft would not exceed noise compatibility standards, because the building retrofit would be completed in compliance with the requirements of the California Building Code, including the Title 24 requirement that interior noise levels must not exceed 45 dB CNEL (or day-night average sound level L_{dn}]), by utilizing additional insulation and upgraded building materials during construction. Consequently, the Project does not include project design features that would create excessive noise for people residing or working in the area, or for future guests of the hotel. The impact would be **less than significant**, and no mitigation is required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less-than-significant impact. The EOP and 2016 Port of San Diego Maritime Emergency Restoration Plan are the two emergency response plans utilized by the District to plan for emergencies (District and County of San Diego 2018; District 2020b). The 2016 Port of San Diego Maritime Emergency Restoration Plan outlines the steps the District would take to coordinate with government and commercial entities to officially reopen District lands following a closure due to an emergency. Coordination efforts between applicable public and private agencies following an official District

closure would not be affected by construction or operation of the Project; therefore, the Project would not substantially impair the 2016 Port of San Diego Maritime Emergency Restoration Plan.

The EOP would be used by the District to respond to various emergencies including fire. Construction of the Project could require temporary road lane closures that could temporarily impair the evacuation and emergency response plans outlined in the EOP. However, before construction activities, the Project would be required to obtain the necessary construction-related traffic control permit from the City of San Diego to address encroachment into the public right-of-way from planned construction activities. Furthermore, the Project applicant would be required to notify and coordinate with all affected agencies, including the City's police department and fire department, before commencing work that would involve lane closures (City of San Diego 2020). Compliance with the traffic control permit would maintain access and connectivity during construction, and the Project would not substantially impair evacuation or emergency response plans outlined in the EOP or other local emergency response plans.

Regarding Project operations, the Project would not involve permanent changes to public rights-of-way that could substantially impair implementation of the EOP or other adopted emergency response plans. Because adequate access would be maintained throughout construction activities, this impact would be **less than significant**, and no mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No impact. The Project site is northwest of Downtown San Diego within an urbanized, developed area. Based on the City of San Diego Official Very High Fire Hazard Severity Zone Map, the Project site is not within an area identified as a high FHSZ (City of San Diego 2009, CAL FIRE 2020b). Construction and operation of the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. **No impact** would occur. Mitigation is not required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with hazards and hazardous materials; thus, mitigation measures are not required.

3.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. Hydrology and Water Quality.				
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☐	☒
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

3.10.1 Environmental Setting

The Project site is located less than 0.5 mile northeast of the San Diego Bay in the San Diego Bay Watershed (City of San Diego n.d. a). The San Diego Bay Watershed encompasses approximately 442 square miles and begins northeast of Descanso along highway 79 near Cuyamaca Rancho State Park. The Project site is within the Pueblo San Diego subwatershed, a 60 square-mile watershed with drainages that consist of relatively small local creeks and pipe conveyances (San Diego State University n.d.). The San Diego Bay is the receiving water body for surface water runoff from the Project site, which occurs indirectly via stormwater drains. The closest dam to the Project site is the Chollas Dam, located 6.5 miles to the east. The Chollas Reservoir was used as a drinking water reservoir until 1966 when it was turned over to the Parks and Recreation Department to manage as a fishing lake (City of San Diego n.d. b).

The San Diego RWQCB has jurisdiction over the Project site and is responsible for designating beneficial uses for water bodies in the San Diego region; establishing water quality objectives; and developing implementation plans to protect designated beneficial uses through the Water Quality Control Plan for the San Diego Basin (Basin Plan) (San Diego RWQCB 1994). The Project site is within the Pueblo San Diego hydrologic unit (HU) (San Diego RWQCB 2020). Beneficial uses for inland surface waters within the Pueblo San Diego HU are limited to contact (potential use) and non-contact recreation, warm freshwater habitat, and wildlife habitat. San Diego Bay receiving waters' beneficial uses include industrial uses, navigation, contact and non-contact recreation, commercial and sport fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, and shellfish harvesting (San Diego RWQCB 1994). Impacts to the Pueblo San Diego HU include water quality degradation, habitat degradation, sediment toxicity, and sewer overflows.

The San Diego Bay is the only impaired waterbody within the vicinity of the Project site and is listed under the Clean Water Act (CWA) 303(d) (CalEPA and SWQCB 2017). Pollutants within the San Diego Bay include mercury from atmospheric deposition, contaminated sediments, historic land management activities, urban runoff, and unknown sources; polycyclic aromatic hydrocarbons from unknown sources; and PCBs from contaminated sediments, dredging, historic land management activities, illegal dumping, spills, urban runoff, and unknown sources (CalEPA and SWQCB 2017).

Groundwater at the Project site is directly tied to the San Diego Bay and has a high salt content making it unsuitable for consumption. Borings were taken to estimate groundwater depth within the Project site as part of the Project's geotechnical analysis, and groundwater depths range from 9 to 11 feet below the existing grade (GPI 2019).

Construction activities that disturb 1 acre or more of land must obtain coverage under the San Diego SWRCB Construction General Permit (Order No. 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file a Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction BMPs and prepare a construction SWPPP containing a site map that shows the construction site perimeter, proposed buildings, stormwater collection and discharge points, general topography both before and after construction, and general drainage patterns across the site.

The Municipal Stormwater Permit (Order No. R9-2013-0001 as amended by Order Nos. R9-2015-001 and R9-2015-0100) is a NPDES permit that requires the owners and operators of Municipal Separate Storm Sewer System (MS4s) within the San Diego Region to implement management programs to limit discharges of pollutants and non-stormwater discharges to and from their MS4 from all phases of development. In compliance with the Municipal Stormwater Permit, the District developed a Jurisdictional Runoff Management Program (JRMP) that addresses issues related to construction activities and issues related to existing development. The District also adopted a jurisdiction-specific local BMP Design Manual in accordance with the Municipal Stormwater Permit that includes post-construction stormwater requirements for development projects under District jurisdiction. All new development and redevelopment projects are required to implement standard source control and site design BMPs to eliminate or reduce stormwater runoff pollutants. The JRMP requires that project applicants submit a Stormwater Quality Management Plan (SWQMP) accurately describing how the project will meet source control site design and pollutant control BMP requirements. The BMP Design Manual is intended to help a project applicant develop a SWQMP that complies with local and MS4 Permit requirements.

3.10.2 Discussion

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less-than-significant impact. The Project site is less than 0.5 mile from San Diego Bay, and stormwater from the existing Annex Building and associated parking lot flow through the District's and City of San Diego's storm drain systems and ultimately into the San Diego Bay. Construction activities involving ground disturbance could degrade

water quality if pollutants or contaminants from construction enter the storm drain system and contaminate the San Diego Bay, which is a designated CWA 303(d) impaired water body (CalEPA and SWRCB 2017). Because the Project would disturb more than 1 acre of land, the Project would be required to obtain coverage under the San Diego SWRCB Construction General Permit. To receive coverage under the Construction General Permit, the Project applicant would be required to develop a SWPPP and demonstrate conformance with applicable BMPs to minimize construction impacts on surface and groundwater quality. Furthermore, the Project applicant would also be required to implement standard source control and site design BMPs to eliminate or reduce stormwater runoff pollutants and prepare a SWQMP describing how the project will meet source control site design and pollutant control BMP requirements per the Municipal Stormwater Permit.

During operation of the Project, stormwater would be filtered through the 5,000-square-foot stormwater treatment basin constructed in the southern portion of the proposed parking lot. Stormwater would pass through approximately 20 inches of amended soil and an additional 24 inches of gravel before entering the stormwater system that drains into the San Diego Bay. In addition to the 5,000-square foot stormwater treatment basin, there would be approximately 6,000 square feet of landscaped pervious surface area throughout the proposed parking lot to capture and treat surface flows. The landscaping would consist of drought tolerant plant species watered with a drip system that conserves water by avoiding irrigation during and after rain events.

Compliance with the requirements of the Construction General Permit along with the landscaping and water quality design features of the Project would prevent the Project from substantially degrading surface or groundwater quality or violating water quality standards or waste discharge requirements. Impacts would be **less than significant**, and no mitigation is required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less-than-significant impact. Construction of the Project could require excavation at depths of up to 10 feet below existing grade. Groundwater depths at the Project site are estimated to range from 9 to 11 feet below the existing grade, therefore dewatering may be required (GPI 2019). Should groundwater be encountered during Project construction, testing would occur in accordance with DTSC and RWQCB requirements before dewatering activities. If dewatering activities are needed, they would include the potential use of Baker tanks and/or filtration bags, for example, if needed to treat dewatered groundwater before discharge into the stormwater system and/or sewer system.

Additionally, approximately 11,000 square feet of landscaped pervious surface, including a stormwater treatment basin, would be installed in the proposed parking lot. The existing site contains approximately 2,000 square feet of exterior pervious area, therefore the Project would increase the amount of pervious surface area on the Project site by approximately 9,000 square feet, which would allow for additional ground absorption of stormwater during operations. However, it should be noted that the Project site is close to the San Diego Bay; groundwater in the area is saline from saltwater intrusion. As such, the Project site is not considered to be an area identified for groundwater recharge activities. For these reasons, construction and operation of the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin and impacts would be **less than significant,** and no mitigation is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial on- or offsite erosion or siltation;

Less-than-significant impact. The Project site is flat and covered with impervious surfaces, and existing stormwater runoff is directed to the District's and City of San Diego's storm drain systems and ultimately into San Diego Bay. Project construction activities would involve excavation and movement of soil, which would temporarily increase

erosion or siltation potential at the site. If not properly controlled, these activities could accidentally discharge wastes into the San Diego Bay through the City of San Diego's storm drain system. However, the Project applicant would be required to apply for coverage under the NPDES Regional MS4 Permit and comply with its requirements which would necessitate the implementation and maintenance of on-site BMPs to control potential erosion and siltation and prevent discharges offsite. The Project proponent would also be required to comply with the District's BMP Design Manual and prepare a SWQMP that accurately describes how the Project will meet source control site design and pollutant control BMP requirements in compliance with the MS4 Permit. Regulatory compliance would ensure that the Project construction does not result in substantial long-term effects on water quality.

The existing site contains approximately 2,000 square feet of pervious area (currently a landscaped area west of the Annex) that would be incorporated into the first floor of the proposed hotel, and thus converted from pervious to impervious area. The Project includes approximately 11,000 square feet of pervious area, resulting in a net increase of 9,000 square feet of pervious surfaces on the site. Therefore, the Project would not increase the amount of impervious surface area on the site; instead, there would be an approximately 7,000 square foot increase of pervious surfaces with the addition of the stormwater treatment basin and other landscaped areas in the parking lot. No long-term substantial changes to surface drainage patterns would occur that could cause substantial on- or offsite erosion or siltation. As a result, this impact would be **less than significant**, and no mitigation is required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

No impact. Project construction activities would occur within the developed site and would not decrease the amount of pervious surface area. During operation of the Project, there would be an additional 9,000 square feet of pervious surface area, which would decrease the rate and amount of surface runoff. Also, runoff from non-pervious surface areas would be routed to the stormwater treatment basin, which would retain water before entering into the storm drain system. Therefore, there would be **no impact** related to flooding from a substantial increase in the rate or amount of surface runoff. No mitigation is required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

Less-than-significant impact. As noted in response C-ii, the Project would not result in an increase in the volume of runoff water that would exceed the capacity of the existing or planned stormwater drainage system given the decrease in impervious surfaces and increase in pervious landscaped areas, which would result in decreased surface flows. The Project may require changes to existing on-site storm drains because existing buildings would be replaced; the new storm drains would be appropriately sized and able to carry stormwater during a rain event, as required by the District's JRMP, thereby preventing on-site drainage issues. Stormwater pollutant control BMPs would meet the District's JRMP and BMP Design Manual performance standards, which mandate that post-construction runoff rates match pre-construction runoff rates for the 85th-percentile storm event. BMPs would be implemented that would retain onsite the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event. The Project would not contribute additional sources of polluted runoff during operation with the installation of the stormwater treatment basin and the increase in pervious surface area. Moreover, the requirement to prepare a SWQMP and implement related stormwater BMPs would minimize the potential for pollutants to enter storm drains. Therefore, a **less-than-significant** impact would occur from construction and operation of the Project, and no mitigation is required.

iv) Impede or redirect flood flows?

Less-than-significant impact. The Project is in an area with minimal flood risk (FEMA 2019). Project construction could temporarily impede or redirect flood flows, however construction impacts would be temporary and the Project would be required to comply with applicable BMPs to reduce flooding potential. Furthermore, a stormwater treatment basin

would be constructed and the overall pervious surface area on the site would increase, reducing the potential for impeded and redirected flood flows. Therefore, this impact would be **less than significant**, and no mitigation is required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No impact. The Project site is less than 0.5 mile from San Diego Bay and outside of the tsunami inundation zone (California Emergency Management Agency 2009). Should a tsunami occur, it is unlikely that the Project site would be inundated. Furthermore, the County of San Diego Office of Emergency Services issues tsunami warnings and provides guidelines for what to do during and after a tsunami warning, and the Port Harbor Police has a tsunami early response/warning protocol. Sufficient tsunami warning and response systems are in place in the San Diego Bay. The Project is also directly adjacent to Pacific Highway, which is a designated tsunami evacuation route (City of San Diego n.d. c). Additionally, there would be no change in exposure to this hazard from the existing conditions as a result of the Project.

Regarding seiche waves and mudflows, the Project site is flat and is not located adjacent to any unstable slopes that may be subject to mudflows during large storm events. In addition, the Project site would not be subject to inundation by seiche as this phenomenon is typically associated with land-locked bodies of water, none of which occur near the Project site. The closest inland water body is Chollas Dam, located 6.5 miles to the east. Therefore, the Project would not be susceptible to inundation by seiche or mudflow. For these reasons, there would be **no impact** related to the risk release of pollutants due to Project inundation from floods, tsunamis, or seiches. No mitigation is required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-than-significant impact. The Project site is within the San Diego RWQCB jurisdiction and is required to comply with the Basin Plan. Beneficial uses, water quality objectives, and implementation programs are established within the Basin Plan to protect designated beneficial uses (San Diego RWQCB 1994). The Project site is within the Pueblo San Diego HU and beneficial uses for inland waterbodies within this HU include contact (potential use) and non-contact recreation, warm freshwater habitat, and wildlife habitat (San Diego RWQCB 2020). While the Project site is within the Pueblo San Diego HU, impacts to associated beneficial uses are limited given the proximity of the Project site to San Diego Bay, and Project-related impacts likely to affect San Diego Bay. San Diego Bay has a multitude of beneficial uses including industrial uses, navigation, contact and non-contact recreation, commercial and sport fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, and shellfish harvesting (San Diego RWQCB 1994). Project construction could cause impacts to the San Diego Bay if water quality control measures are not implemented. However, during construction, the Project proponent would implement BMPs, consistent with the District's water quality protection measures, as required by the MS4 NPDES Permit and Construction General Permit. These measures would prevent runoff and erosion associated impacts from construction, limiting affects to the San Diego Bay. During operation of the Project, a storm water treatment basin would be present on the Project site to aid in the filtration of rainwater and limit runoff, and the overall pervious surface of the Project site would increase over existing conditions. These changes to the Project site would reduce water quality impacts over existing conditions, which would thereby reduce potential impacts to the San Diego Bay. Implementation of the measures required by the MS4 NPDES Permit and Construction General Permit during construction and water quality design features that would be in place during operation would ensure that the Project is consistent with the Basin Plan.

The Sustainable Groundwater Management Act (SGMA) requires all groundwater basins designated as medium or high priority to develop a Groundwater Sustainability Plan. In San Diego County, the State has designated four of the county's basins as medium-priority and subject to SGMA: Borrego Valley, San Diego River Valley, San Luis Rey Valley and San Pasqual Valley (County of San Diego n.d.). The Project site is not within any of the four designated basins. Furthermore, groundwater at the Project site is directly tied to the San Diego Bay and has a high salt content making it unsuitable for consumption. During operation, water would be sourced offsite from existing water utility lines and

would not conflict with or obstruct a groundwater sustainability plan. As previously described, though Project construction may require dewatering during excavation, the groundwater removed would be minimal compared with the groundwater supply and the groundwater at the site is too saline to be used for drinking water. Because the Project site is not located on or near a designated groundwater basin under SGMA and would source all of its water during construction and operation from off site, it would not conflict with the SGMA. The impact would be **less than significant**, and no mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with hydrology and water quality; thus, mitigation measures are not required.

3.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning.				
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

3.11.1 Environmental Setting

The Project site is situated in a developed portion of District tidelands within the City of San Diego, and surrounding land uses consist of airport-related commercial and industrial. The project site is within Planning District 2, Harbor Island/Lindbergh Field, of the PMP and the existing land use designation is Aviation Related Industrial (District 2020a). This land use designation is intended to support the operation of SDIA along with the San Diego's aerospace manufacturing activities. Allowed activities within the Aviation Related Industrial land use designation include the manufacture and sale of aircraft, engines, parts, motors, machines, turbines, and metal articles. Allowed ancillary uses include training facilities, related meeting and classrooms, various offices, parking facilities, and storage areas.

The Project includes a PMPA to allow for the construction and operation of a hotel on the project site. The PMPA would change the land use designation for the Project site from "Aviation Related Industrial" to "Commercial Recreation" to facilitate construction and operation of the STAY OPEN project. The Commercial Recreation land use designation allows for visitor-serving facilities and accommodations, which the Project would conform with by operating a hotel (District 2020a). The Project is considered an "appealable" development under Section 30715 of the California Coastal Act (Coastal Act), and per Section 30711 of the Coastal Act, the PMPA would add this Project to the Port Master Plan's Project List for Planning District 2, Harbor Island/Lindbergh Field.

3.11.2 Discussion

a) Physically divide an established community?

Less-than-significant impact. The Project would redevelop the existing Annex Building into a hotel. All Project work would occur on the Project site and would not require construction of a linear feature, such as a roadway, that could physically divide an established community. The impact would be **less than significant**, and no mitigation is required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less-than-significant impact. The applicable land use plan governing the Project site is the certified Port Master Plan (PMP). The existing land use designation for the project site, "Aviation Related Industrial," allows for land uses that support the operation of SDIA along with aerospace manufacturing activities. The Project includes a PMPA to change the land use designation of the Project site from "Aviation-Related Industrial" to "Commercial Recreation," which allows for hotel use. As part of the approval, the Project would be required to be consistent with the goals and objectives of the PMP, including the proposed land use designation. The "Commercial Recreation" land use

designation serves the needs of recreationalists for lodging, food, transportation services, and entertainment (District 2020a). The Project would be consistent with the "Commercial Recreation" designation by developing the southern half of the existing Annex Building into a hotel with lower cost overnight accommodations, indoor/outdoor bar and café, rooftop restaurant and bar, parking stalls for hotel and restaurant guests, and designated parking for shared transportation vehicles including scooters and bicycles. The existing PMP has 52.6 acres of Commercial Recreation-designated land within the Harbor Island/Lindbergh Field Planning District (Planning District 2), and the Project would add 1.74 acres to that total. The PMPA would amend the PMP to reflect the additional Project acreage for the "Commercial Recreation" land use designation within Planning District 2, as well as add the proposed project to the Planning District 2 "Project List." Therefore, the Project would be consistent with the PMP.

The Project would not conflict with Chapter 3 of the California Coastal Act (CCA), Article 2 Public Access or Article 6, Development, as explained below. Specifically, the Project would not conflict with Section 30210 of the CCA regarding providing recreational opportunities for all people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse because it would not interfere with recreational opportunities in the project area (refer to Section 3.16, "Recreation," for additional discussion of Project impacts to recreational facilities). In addition, neither Project construction or operation would impede or obstruct public access from the nearest public highway to the shoreline and along the coast as required by Section 30212.

The Project would be consistent with Section 30213 by providing lower cost visitor accommodations in the form of PODs.

The Project would also not conflict with CCA, Article 6, Development. Section 30250 ("Location, existing developed area") requires that most development be located within, contiguous with, or in close proximity to, existing developed areas. The Project site consists of an existing vacant building and developed paved parking lot and would be consistent with this requirement. The Project would not conflict with Section 30251 regarding the protection of the scenic and visual qualities because it would not interfere with views to or along the ocean or coast, alter natural land forms, or be visually incompatible with the character of surrounding areas as addressed in Section 3.1, "Aesthetics." Section 30252 ("Maintenance and enhancement of public access") requires new development to maintain and enhance public access to the coast through several methods including providing adequate parking facilities or providing substitute means of serving the development with public transportation. The Project would not conflict with this section because it would provide adequate parking supply to meet demand, is located approximately 200 feet southeast of the Middletown Station on the MTS Trolley Green Line, and promotes alternatives to driving by providing designated parking for shared transportation vehicles, including scooters and bicycles. Refer to Section 3.17, "Transportation," for discussion of the project's parking and transportation impacts. The Project would also not conflict with Section 30253 regarding minimization of adverse impacts in areas of high geologic, flood, or fire hazard as described in Sections 3.7, "Geology and Soils," 3.10, "Hydrology and Water Quality," and 3.20, "Wildfire."

As discussed in Section 3.9, "Hazards and Hazardous Materials", the Project is within the SDIA ALUCP area. ALUC review by the SDIA determined that the Project is consistent with the ALUCP.

The Project would not conflict with the CCA, PMP or the SDIA ALUCP. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. This impact would be **less than significant**. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with land use and planning; thus, mitigation measures are not required.

3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources.				
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?	☐	☐	☐	☒

3.12.1 Environmental Setting

The Surface Mining and Reclamation Act directs the State Geologist to identify and map the non-fuel mineral resources of the State to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. Areas known as Mineral Resource Zones (MRZs) are classified on the basis of geologic factors, without regard to existing land use and land ownership. The areas are categorized into four general classifications (MRZ-1 through MRZ-4). Of the four, the MRZ-2 classification is recognized in land use planning because the likelihood for occurrence of significant mineral deposits is high, and the classification may be a factor in the discovery and development of mineral deposits that would tend to be economically beneficial to society.

The Project site is classified as MRZ-1, which indicates no significant mineral deposits are located at the Project site (City of San Diego 2008a: Figure CE-6). The Project site is not designated as a locally important mineral resource recovery site in the City of San Diego General Plan Conservation Element (City of San Diego 2008a)

3.12.2 Discussion

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. According to City of San Diego's General Plan Conservation Element, the Project site is in an area designated as MRZ-1, indicating that no significant mineral deposits are present (City of San Diego 2008a: Figure CE-6). Furthermore, the Project site is in a highly developed and urbanized area with land uses are incompatible with and preclude mineral extraction. Therefore, the Project would not result in the loss of availability of locally important mineral resources and no impact would occur. No mitigation is required.

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. The Project site is not designated as a locally important mineral resource recovery site in the City of San Diego General Plan Conservation Element (City of San Diego 2008a). Thus, Project implementation would not result in a loss of availability of locally important mineral resources. No impact would occur. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with mineral resources; thus, mitigation measures are not required.

3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. Noise.				
Would the Project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

3.13.1 Environmental Setting

ACOUSTIC FUNDAMENTALS

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. Sound is the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a human ear. Noise is defined as loud, unexpected, annoying, or unwanted sound. As sound travels through the atmosphere from the source to the receiver, noise levels attenuate (i.e., decrease) depending on a variety of factors, including geometric spreading (i.e., spherical or cylindrical spreading), ground absorption (i.e., hard versus soft sites), atmospheric conditions (e.g., wind direction and speed, air temperature, humidity, turbulence), and shielding by natural or human-made features.

The amplitude of pressure waves generated by a sound source determines the loudness of that source, also called the sound pressure level (SPL). SPL is most commonly described by using dB because this logarithmic unit best corresponds to the way the human ear interprets sound pressures. However, the decibel scale does not adequately characterize how humans perceive noise because the human ear is not equally sensitive to loudness at all frequencies (i.e., pitch) in the audible spectrum. To approximate the response of the human ear, sound levels of individual frequency bands are weighted, depending on the human sensitivity to those frequencies. Then, an "A-weighted" sound level (expressed in units of A-weighted decibels or dBA) can be computed based on this information. All sound levels discussed in this section are expressed in A-weighted decibels.

Because decibels are logarithmic units, SPLs expressed in dB cannot be added or subtracted through ordinary arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3-dB increase. In typical noisy environments, changes in noise of 1–2 dB are generally not perceptible. However, it is widely accepted that people can begin to detect sound level increases of 3 dB in typical noisy environments. Further, a 5-dB increase is generally perceived as a distinctly noticeable increase, and a 10-dB increase is generally perceived as a doubling of loudness (Caltrans 2013:2-10).

Various noise descriptors have been developed to describe time-varying noise levels. The noise descriptors used in this chapter include:

- Equivalent Continuous Sound Level (L_{eq}): L_{eq} represents an average of the sound energy occurring over a specified period. In effect, L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound level that occurs during the same period (Caltrans 2013:2-48). For instance, the 1-hour equivalent

sound level, also referred to as the hourly L_{eq}, is the energy average of sound levels occurring during a 1-hour period; and

- Community Noise Equivalent Level (CNEL): CNEL is the energy average of the A-weighted sound levels occurring over a 24-hour period, with a 10-dB penalty applied to sound levels occurring during the nighttime hours between 10 p.m. and 7 a.m. and a 5-dB penalty applied to the sound levels occurring during evening hours between 7 p.m. and 10 p.m. (Caltrans 2013:2-48).

GROUND VIBRATION

Vibration is the periodic oscillation of a medium or object with respect to a given reference point. Groundborne vibration is vibration of and through the ground. Sources of ground-borne of vibration include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) and those introduced by human activity (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous, (e.g., operating factory machinery) or transient in nature (e.g., explosions).

Groundborne vibration amplitudes are commonly expressed in peak particle velocity (PPV) or root-mean-square (RMS) vibration velocity. PPV and RMS vibration velocity are normally described in inches per second (in/sec) but can also be expressed in decibel notation, which is used mainly in evaluating human response to vibration.

EXISTING NOISE ENVIRONMENT

The predominant noise sources influencing noise levels on and near the Project site include vehicle traffic on I-5 and the Pacific Highway, train activity on the railroad shared by BNSF, Amtrak, and North County Transit District's *Coaster* commuter train, and aircraft activity associated with San Diego International Airport. These noise sources are shown in Figure 2-2. Approximately 85 feet to the east of the Project site, running parallel to the Pacific Highway and I-5, is the BNSF Railway, consisting of two sets of parallel tracks. Additionally, the main runway of the SDIA lies approximately 1,200 feet southwest of the Project site.

I-5, which lies approximately 410 feet east of the Project site, and Pacific Highway, which runs along the west side of the Project site, carry large volumes of vehicles. Existing traffic noise levels on the nearby segments of I-5 and the Pacific Highway were estimated using calculation methods consistent with Federal Highway Administration (FHWA) Traffic Noise Model, Version 2.5 (FHWA 2004) and using average daily traffic volumes (Caltrans 2018). Table 3.13-1 summarizes the modeled existing traffic noise levels at the Project site and lists distances to the 70, 65, and 60 CNEL traffic noise contours. Modeling results for existing traffic noise levels are presented here because traffic noise is a predominant source of existing noise levels on the Project site and in the Project area (periodic aircraft landing and takeoff and locomotive operations are also predominant noise sources). For further details on traffic-noise modeling inputs and parameters, refer to Appendix F.

Table 3.13-1 Summary of Modeled Existing Traffic Noise Levels

Roadway Segment	CNEL at the Project site (dB)	Distance from Roadway Centerline to CNEL Contour (feet)		
		70	65	60
Interstate 5 between West Laurel Street to Sassafras Street	70.9	574	1,236	5,738
Pacific Highway from West Laurel Street to Sassafras Street	65.4	98	211	981

Notes: CNEL = Community Noise Equivalent Level; dB = decibel.

All modeling assumes average pavement, level roadways (less than 1.5% grade), and constant traffic flow, and it does not account for shielding of any type or finite roadway adjustments. The contour distance estimates do not account for the fact that buildings and other structures in the Project area would partially shield noise generated from these roadway segments. For additional details, refer to Appendix F for detailed traffic data and for traffic-noise modeling input data and output results.

Source: Data modeled by Ascent Environmental in 2021

Sources of railway noise and groundbourne vibration include daily passenger (Amtrak) and commuter (Coaster) trains and BNSF freight trains. BNSF runs approximately four freight trains per day between San Diego and the Greater Los Angeles area, two in each direction. However, these trains operate on an as-needed basis and do not have a fixed schedule (City of San Diego 2015b). There are 12 Amtrak passenger trains operating per day, six northbound and six southbound, arriving at and departing from the San Diego downtown terminus (Santa Fe) station between 5:55 a.m. and 1:15 a.m. (Amtrak 2020). There are also 12 daily Coaster commuter trains operating per day, six northbound and six southbound, arriving at and departing from the Santa Fe station between 6:05 a.m. and 7:15 p.m. (North County Transit District 2020).

NOISE-SENSITIVE RECEPTORS

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Sensitive noise receptors are also considered vibration-sensitive receptors in addition to commercial and industrial buildings where vibration could interfere with operations within the building, including levels that may be well below those associated with human annoyance.

The closest noise-sensitive receptors to the Project site are the single-family and multi-family residences on India Street east of I-5, approximately 700 feet east of the easternmost edge of the Project site. The City of San Diego zoning designation that applies to these noise-sensitive receptors is RM-2-5, which permits medium density multiple dwelling units up to a maximum density of 1 dwelling unit for each 1,500 square feet of lot area (San Diego Municipal Code Section 131.0406[b][2]).

APPLICABLE NOISE AND VIBRATION STANDARDS

Federal

Federal Transit Administration

To address the human response to ground vibration, the Federal Transit Administration (FTA) has set forth guidelines for maximum-acceptable vibration criteria for different types of land uses. These guidelines are presented in Table 3.13-2.

Table 3.13-2 Ground-Borne Vibration Impact Criteria for General Assessment

Land Use Category	GBV Impact Levels (VdB re 1 microinch/second)		
	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 [d]	65 [d]	65 [d]
Category 2: Residences and buildings where people normally sleep.	72	75	80
Category 3: Institutional land uses with primarily daytime uses.	75	78	83

Notes: GBV = ground-borne vibration; VdB = vibration decibels referenced to 1 microinch per second and based on the root mean square velocity amplitude.

[a] "Frequent events" is defined as more than 70 vibration events of the same source per day.

[b] "Occasional events" is defined as between 30 and 70 vibration events of the same source per day.

[c] "Infrequent events" is defined as fewer than 30 vibration events of the same source per day.

[d] This criterion is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define acceptable vibration levels.

Source: FTA 2018

State

California Building Code Sound Transmission Standards

Noise within habitable units that is attributable to external sources is regulated by the California Building Standards codified in CCR, Title 24, Part 2, Section 1207. These standards are enforceable at the time of construction or during occupancy and apply to habitable units with common interior walls, partitions, and ceilings or those adjacent to public areas, such as halls, corridors, stairways, and service areas. Under these standards, the interior noise levels attributable to exterior sources shall not exceed 45 decibels (dB) in any habitable room. The noise metrics used to measure these levels can be day-night average sound level (L_{dn}) or Community Noise Equivalent Level (CNEL), consistent with the local general plan. An acoustical analysis documenting compliance with the interior sound level standards shall be prepared for structures containing habitable rooms. Under California Public Resources Code Section 25402.1(g), all cities and counties in the State are required to enforce the adopted California Building Code, including these standards for noise in interior environments.

California Department of Transportation

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Manual (Caltrans 2013). The manual provides general guidance on vibration issues associated with construction and operation of projects in relation to human perception and structural damage. Table 3.13-3 presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

Table 3.13-3 Caltrans Recommendations Regarding Levels of Vibration Exposure

PPV (in/sec)	Effect on Buildings
0.4–0.6	Architectural damage and possible minor structural damage
0.2	Risk of architectural damage to normal dwelling houses
0.1	Virtually no risk of architectural damage to normal buildings
0.08	Recommended upper limit of vibration to which ruins and ancient monuments should be subjected
0.006–0.019	Vibration unlikely to cause damage of any type

Notes: PPV= peak particle velocity; in/sec = inches per second.

Source: Caltrans 2013

Local

The District has not established noise standards. The District relies on noise standards as established in the City of San Diego Noise Ordinance (City of San Diego 2019) as L_{eq} standards and in the City's CEQA Guidelines (City of San Diego 2016a) and General Plan Noise Element (City of San Diego 2015a) as CNEL standards.

City of San Diego General Plan Noise Element

The City of San Diego General Plan Noise Element specifies compatibility standards for different land use types. According to the General Plan, single and multiple dwelling units are compatible up to 60 CNEL and conditionally compatible up to 75 CNEL provided interior noise levels do not exceed 45 CNEL (City of San Diego 2015a). Thus, for the purposes of this analysis, an exterior compatibility level of 60 CNEL and an interior compatibility level of 45 CNEL were applied to residential receptors in the Project vicinity.

City of San Diego CEQA Guidelines

The City's CEQA significance thresholds for traffic noise are 65 CNEL for exterior usable space at residences, libraries, hospitals, hotels, motels, and parks, and 45 dB CNEL for interior spaces, pursuant to Title 24 as specified by Development Services Department (City of San Diego 2016a), which aligns closely with the General Plan Noise Element compatibility standards. As specified in the California Building Code, the building retrofit to be completed as part of the Project will be required to achieve the Title 24 standards for interior room noise.

City of San Diego Municipal Code

Section 59.5.0401(a) of the City's Noise Abatement and Control Ordinance (Sound Level Limits) states that:

- It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in the following table [shown as Table 3.13-4 in this CEQA document], at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Table 3.13-4 City of San Diego Noise Abatement and Control Ordinance Limits

Land Use	Time of Day	Sound Level dB L_{eq}
Single Family Residential	7 a.m. to 7 p.m.	50
	7 p.m. to 10 p.m.	45
	10 p.m. to 7 a.m.	40
Multi-Family Residential	7 a.m. to 7 p.m.	55
	7 p.m. to 10 p.m.	50
	10 p.m. to 7 a.m.	45
All other Residential	7 a.m. to 7 p.m.	60
	7 p.m. to 10 p.m.	55
	10 p.m. to 7 a.m.	50
Commercial	7 a.m. to 7 p.m.	65
	7 p.m. to 10 p.m.	60
	10 p.m. to 7 a.m.	60
Industrial or Agricultural	Anytime	75

Section 59.5.0401(b) of the City's Noise Abatement and Control Ordinance (Sound Level Limits) states that:

- The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Sections 59.5.0404 of this article.

Section 59.5.0404 of the City's Noise Abatement and Control Ordinance (Construction Noise) states that:

- It shall be unlawful for any person, between the hours of 7 p.m. of any day and 7 a.m. of the following day, or on legal holidays as specified in Section 21.0104 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand.
- It shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7 a.m. to 7 p.m.

3.13.2 Discussion

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?

Less-than-significant impact. Noise would be generated during Project construction and by on-site operational activities, including events for guests and the public such as private parties, beverage tastings, and workout classes. Vehicle trips associated with Project operations could also contribute to traffic noise levels in the Project area. Analysis of these types of noise sources is provided separately below.

Construction Noise

Project construction would involve the use of heavy equipment such as dozers, excavators, graders, backhoes, forklifts, generator sets, pavers, paving equipment, rollers, micro piledriving equipment, and air compressors. The loudest types of equipment used during construction would include backhoes, graders, dozers, and an auger drill rig for micro piledriving, all of which individually generate 80–85 dB L_{eq} at 50 feet (FHWA 2006:3). Noise attenuation calculations were conducted to estimate the level of noise exposure at the nearest offsite noise-sensitive land uses and conservatively assumed simultaneous operation of three pieces of heavy equipment close to each other at the boundary of the Project site nearest to the receptor. These attenuation calculations are based on FHWA's Roadway Construction Noise Model User's Guide (FHWA 2006) and are presented in detail in Appendix F.

The construction noise attenuation calculations show that the combined predicted noise level from simultaneous operation of a backhoe, auger drill rig, and dozer would be 83.6 dB L_{eq} at 50 feet. However, noise levels decrease as distance from the equipment increases, and the calculations demonstrate that. through distance alone, the combined exterior noise level at the nearest residence located on India Street, 700 feet to the east of the eastern edge of the Project site, would decrease to 60.7 dB L_{eq}. In addition, the modeling does not account for the additional noise attenuation that would be provided by buildings and structures, including an elevated section of I-5, located between the Project site and this residence. Therefore, the construction modeling likely overestimates the combined exterior noise level at the nearest residence. Nevertheless, the modeled level of noise exposure (60.7 dB L_{eq}) would not exceed the City's daytime exterior construction noise threshold of 75 dB L_{eq} established in Section 59.5.0404 the City's Noise Abatement and Control Ordinance. Furthermore, given that the nearest residence is located inside the 65 CNEL noise contour for existing traffic on I-5—as estimated and shown in Table 3.13-1—it is unlikely that Project-related construction noise would be noticeable to the occupants.

On-Site Operational Noise

Noise generated by vehicle activity in the parking lot would be consistent with noise from vehicle traffic and associated with the operation of other land uses in the Project area. On occasion, the Project would accommodate events for guests and the public such as private parties, beverage tastings, and workout classes that may involve music. These events may occur indoors or outdoors, for example within the first floor bar and café space or the second floor outdoor rooftop restaurant and bar area located on the western side of the Project site along Pacific Highway as shown on Figure 2-5. This analysis assumes that such events and outdoor noise associated with use of the outdoor rooftop bar and restaurant area could occur at different times throughout the day, including after 10:00 p.m.

To determine whether the Project could result in a substantial permanent increase in on-site operational noise levels, this analysis compares estimated noise levels to the City of San Diego Noise Abatement and Control Ordinance Limits provided in Table 3.13-4. Because the Project would be a commercial land use, and the nearest residential receptor to the Project site is located within a multi-family zoning district, the applicable sound level limit for this analysis is equal to the arithmetic mean of the respective limits for commercial and multi-family residential land uses (City of San Diego Noise Abatement and Control Ordinance Section 59.0401[b]). Therefore, operational noise levels from the Project at the nearest residential receptor are compared to the following sound level limits to determine whether such noise levels would be substantial:

- 7 a.m. to 7 p.m.: 60 dB L_{eq} (arithmetic mean of 65 and 55 dB L_{eq})

- 7 p.m. to 10 p.m.: 55 dB L_{eq} (arithmetic mean of 60 and 50 dB L_{eq})
- 10 p.m. to 7 a.m.: 52.5 dB L_{eq} (arithmetic mean of 60 and 45 dB L_{eq})

Noise levels associated with outdoor dining or occasional outdoor events on the rooftop restaurant and bar would be directed to the west, generally toward SDIA and away from the nearest residential receptor, which would be located more than 800 feet to the east of the rooftop restaurant and bar space. In addition, to the extent noise levels from the rooftop restaurant and bar would emanate east toward the nearest residential receptor, noise levels would be attenuated by several intervening structures, including the interior second floor of the Project; the existing buildings located directly east of the Project site along Kettner Blvd; and the nearby section of I-5, which is located approximately 20 feet higher in elevation than the proposed maximum height of the Project (refer to Section 3.1, "Aesthetics," for discussion of the height of I-5 in relation to the elevation of the Project site and the maximum height of the Project).

Based on sound level measurements collected at other outdoor event venues that used amplified sound, it is anticipated that events on the Project site could generate sound levels of up to 75 L_{eq} at 50 feet (Bollard Acoustical Consultants 2019:17). Through distance alone, these noise levels would attenuate to approximately 52 L_{eq} at the nearest residences, which are located 700 feet away on India Street.

Additional noise attenuation of at least 5 dB would occur due to several intervening structures between these noise sources and the nearest residential receptor as described above, which would reduce noise exposure to no greater than 47 L_{eq} at the nearest residence. Therefore, operational noise levels at nearby residences would not exceed the applicable sound level limits for 7 a.m. to 7 p.m. of 60 dB L_{eq}, 7 p.m. to 10 p.m. of 55 dB L_{eq}, or 10 p.m. to 7 a.m. of 52.5 dB L_{eq}. Therefore, this impact would be less than significant.

Traffic Noise

Based on the transportation analysis conducted for the Project (Appendix G), operation would generate 835 daily vehicle trips, which would be distributed across roadways in the project area, including Pacific Highway, Kettner Boulevard, Palm Street, Sassafras Street, and I-5. Average daily traffic (ADT) counts for roadway segments in the project area are provided below:

- Pacific Highway (Laurel Street to Sassafras Street): 23,000 ADT (Appendix F)
- Palm Street (Kettner Boulevard to California Street): 3,673 ADT (City of San Diego 2016b)
- Kettner Boulevard (Redwood Street to Sassafras Street): 18,207 ADT (City of San Diego 2016b)
- Sassafras Street (Kettner Boulevard to Pacific Highway): 14,208 ADT (City of San Diego 2016b)
- I-5 (Laurel Street to India/Sassafras Street): 203,000 ADT (Appendix F)

As shown in Table 3.13-1, existing traffic noise levels in the project area would exceed the standards of 60 CNEL for exterior compatibility for a residential receptor and 65 CNEL for exterior usable spaces at residences, libraries, hospitals, motels, and parks. Because existing nose levels exceed these standards, this analysis considers a noise increase of 3dB to be a substantial permanent increase (3 dB is the level that is considered noticeable to people in typical noisy environments, and corresponds to a doubling of traffic volumes along a roadway (Caltrans 2013:2-10).

Based on the ADT counts provided above, the Project would not result in a level of daily trips that could double traffic volumes along any roadway in the Project and in turn result in a noticeable increase in noise levels along roadways in the Project area. Therefore, the added traffic volume associated with the Project would not result in a permanent noticeable increase in ambient noise levels in the Project vicinity, and this impact would be less than significant.

Summary

Because noise generated during both construction and operation of the Project would not exceed applicable City of San Diego noise standards, and because Project-related traffic would not result in noticeable increases in traffic noise, this impact would be **less than significant**. No mitigation is required.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less-than-significant impact. Project construction would not involve the use of ground vibration–intensive activities, such as traditional pile driving and blasting. Pieces of equipment that generate lower levels of ground vibration, such as excavators and pavers, and equipment used in micro piledriving, including a drill rig/truck-mounted augur and air compressor, would be used. These types of common construction equipment do not generate substantial levels of ground vibration that could result in structural damage, except at relatively close distances (i.e., within 10 feet of structures).

Bulldozers, which represent the most intense type of heavy-duty equipment that might be used during Project construction, typically generate a ground vibration level of 0.089 in/sec PPV and 87 vibration decibels at 25 feet (FTA 2018:184). Because this type of equipment would not be used within 50 feet of the Port Administration Building or any other buildings, Project construction would not result in vibration levels that would exceed the Caltrans-recommended criterion of 0.1 in/sec PPV, which is the maximum level at which there is virtually no risk of architectural damage to normal buildings (for reference, levels of 0.4-0.6 in/sec PPV would result in architectural damage and possible minor structural damage). At 50 feet from the Port Administration Building vibration levels would decrease to 78 VdB (Appendix F), which is below the 83 VdB threshold at which infrequent events like bulldozer use could interfere with institutional land uses with primarily daytime uses like the Port Administration Building (Table 3.13-2).

Additionally, with respect to vibration-caused human annoyance, construction activities would occur during the less sensitive daytime hours between approximately 7 a.m. and 7 p.m., Monday through Saturday (except certain Holidays). Based on FTA's recommended method for estimating the propagation of ground vibration from the source, a bulldozer operating at the Project site would not expose the multi-family residences located approximately 700 feet away to the east of I-5 and the railroad corridor to levels of vibration that could cause human annoyance because 700 feet is well beyond the distance at which vibration levels would decrease below the applicable criterion of 80 VdB for infrequent events for Category 2 land uses, which are residences where people normally sleep (Table 3.13-2). Detailed noise propagation calculations are provided in Appendix F. For these reasons, Project construction would not result in vibration levels at sensitive receptors that would cause structural damage or result in human annoyance, and this impact would be **less than significant**. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with noise; thus, mitigation measures are not required.

3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing.				
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 Environmental Setting

The Project site is located in the City of San Diego within the District's jurisdiction. No residential uses are within the District's jurisdiction, including the Project site. The closest residential uses are located approximately 700 feet to the east, on the opposite side of I-5.

3.14.2 Discussion

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

Less-than-significant impact. The growth inducing potential of a Project would typically be considered significant if it fosters growth or a concentration of population in excess of what is assumed in relevant land use and growth plans for the Project area. Significant growth impacts could also occur if a project provides infrastructure or service capacity that would accommodate growth beyond levels currently permitted by local or regional plans or policies. The Project would redevelop the District's existing Annex Building into a hotel. Construction would require up to 65 construction workers. Construction workers are anticipated to commute from within San Diego and would likely not require temporary housing. The Project would not involve the development of new homes or businesses that would directly or indirectly induce population growth. Operation of the hotel would require up to 25 employees at any given time; employees would likely be drawn from the existing labor pool within the San Diego region. Therefore, the Project would not indirectly induce substantial unplanned population growth in the City of San Diego or San Diego region. In addition, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial unplanned population growth. The impact would be less-than-significant and mitigation is not required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No impact. The Project would redevelop the District's existing Annex Building, used for offices; therefore, no people or housing would be displaced. No impact would occur; no mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with population and housing; thus, mitigation measures are not required.

3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services.				
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

3.15.1 Environmental Setting

The City of San Diego's Fire-Rescue Department provides fire, emergency medical, lifeguard and emergency management services including 9-1-1 services, fire inspections, permits and community education (City of San Diego 2021b). In addition, the San Diego Harbor Police Department provides marine crime and firefighting services (District 2021c). The closest fire station to the Project site is Fire Station 3 which is located at 725 West Kalmia Street, approximately 0.9 mile to the south. Law enforcement to the Project site is provided by the San Diego Harbor Police Department and the City of San Diego Police Department (SDPD) provides backup to Harbor Police, as needed. The San Diego Harbor Police Dock is the closest police facility to the Project site, located approximately 0.9 mile to the southeast.

The Project site is located within the San Diego Unified School District. The closest school to the Project site is the Montessori School of San Diego, located 0.2 mile to the northeast, east of I-5. The closest public school to the Project site is Washington Elementary School, located 0.9 mile to the southeast. As identified in Section 3.16, "Recreation", recreation facilities in the vicinity of the Project site include the District's Embarcadero Marina Park, Fifth Avenue Landing Park, Lane Field Park, Ruocco Park, San Diego Bayfront Park, and Tuna Harbor Park (District 2021a). Also in the project vicinity are the County of San Diego's Waterfront Park and Amici Park in Little Italy. The closest library is the San Diego Central Library, located at 330 Park Boulevard approximately 2 miles to the southeast.

3.15.2 Discussion

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:

Fire protection?

Less-than-significant impact. The Project would redevelop the existing Annex Building into a hotel. The newly developed portion of the Annex Building would increase the building area by approximately 20,000 square feet and the building height by approximately 32 feet with the addition of one floor above the existing one-story building. Although the newly developed building would have an increased capacity, it would not require additional fire protection services beyond what is required for the existing building. The hotel building would be a designated Type II-B construction, with the walls and ceiling composed of non-combustible material and a sprinkler system and would comply with then-applicable CBC standards regarding construction and fire suppression. Additionally, the San Diego Fire Department (SDFD) calculated response time estimates to the Project site using San Diego Fire-Rescue's 911 Computer Aided Dispatch System's (CAD) point to point routing. Response times for fire engines, fire trucks, and the battalion chief to the Project site would all be below 6.5 minutes and the SDFD can respond adequately to Project site (Trame, pers. comm., 2021). No new or physically altered fire protection facilities would be required, and response times would remain acceptable. Impacts would be **less-than-significant**, and no mitigation is required.

Police protection?

Less-than-significant impact. The Project would result in an increase in the number of individuals frequenting the Project site, including overnight guests using the hotel facilities and visitors using the lobby indoor/outdoor bar and café and rooftop restaurant and bar. The maximum daily guests and visitors to the Project site is anticipated to be 1,000. This increase in individuals may result in an increase in the need for police protection services due to the potential for crime to increase as a result of the increased activity. However, the total daily maximum number of visitors anticipated would not frequent the Project site at the same time, and employees, guests, and visitors would be spread out throughout the day. Moreover, guests at the hotel would generally be occupying spaces within the hotel, including rooms or PODs, the restaurant, or the café. The project would also be constructed with lighting intended to illuminate areas outside of the hotel, such as the parking lot, which would deter potential crime in outdoor areas. The hotel would also require up to 25 staff, who would be present to aid guests during their stays and/or patronage of other public areas. The San Diego Harbor Police Department confirmed that adequate police protection services to serve the Project are available and that the Project would be anticipated to have a minimal effect on the Department's average response time (Dye, pers. Comm., 2021). Furthermore, police protection services are already provided for the existing Annex Building. No new or physical altered police protection facilities would be required, and response times would remain acceptable. Therefore, the Project would have a **less-than-significant** impact, and no mitigation is required.

Schools?

No impact. No school facilities, including the closest public school to the Project site, Washington Elementary School, would be physically altered by the Project. As discussed in Section 3.14, "Population and Housing", the Project would be a hotel that would not increase the residential population and potential school enrollment in the area. Jobs generated during construction and operation would be drawn from the local workforce. Therefore, the Project would not increase demand for schools. **No impact** would occur. No mitigation is required.

Parks?

No impact. The Project would be a hotel that would not increase the residential population and potential demand for parks in the area. Jobs generated during construction and operation would be drawn from the local workforce. Guests and visitors generated from the Project would have access to the surrounding parks. The San Diego Bay waterfront provides a variety of parks and other recreational facilities to serve the local population as well as tourists who frequent the area. These recreational facilities are designed to serve residents and visitors, and the incremental increase in use by guests generated from the Project would not rise to the level of causing or accelerating substantial physical deterioration or require new or expanded facilities to be constructed. Therefore, the Project would not increase demand for parks. **No impact** would occur. No mitigation is required.

Other public facilities?

No impact. The Project would add approximately 65 short-term construction jobs and up to 25 employees at any given time during operations, all of which are anticipated to be sourced from the local workforce. The Project would not result in population growth that could strain existing public facilities, as discussed in Section 3.14, "Population and Housing." The maximum number of daily guests and visitors to the Project site is anticipated to be 1,000. However, this increase would not affect demand for public facilities such as libraries, which are generally based on residential population because residents are the ones that typically uses such facilities. Therefore, the Project would have **no impact** on other public facilities. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with public services; thus, mitigation measures are not required.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
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?	☐	☐	☒	☐

3.16.1 Environmental Setting

The Project site is located less than 0.5 mile northeast from the District's waterfront, which hosts a range of recreational facilities and parks including the Embarcadero Marina Park, Fifth Avenue Landing Park, Lane Field Park, Ruocco Park, San Diego Bayfront Park, and Tuna Harbor Park (District 2021a). Recreational activities conducted in these parks include biking, running, picnicking, kayaking, and paddle boarding (District 2021b). Art installations are also found throughout the District's waterfront area, and self-guided tours through these various art installations create another form of recreation. The North Embarcadero self-guided tour is the closest to the Project site, located 1 mile south, and is composed of 14 different art installations over a 1-mile route along the waterfront (District n.d. a).

Other parks close to the Project site include Waterfront Park and Amici Park, which are both less than 1 mile south of the Project site. Balboa Park, a large regional park, is also less than 1 mile east of the Project site. Waterfront Park includes civic greens for multi-use activities including events, festivals, and farmers markets; plazas and terraces for events and gatherings; promenades and themed gardens; picnic areas; and children play areas (County of San Diego 2018). Amici Park provides multi-use recreational opportunities and contains a dog park, amphitheater, and bocce ball courts available to the public (Little Italy Association 2021). Balboa Park is a 1,200-acre recreational space containing 17 museums, a variety of gardens, running and walking trails, and the San Diego Zoo (City of San Diego 2021a).

3.16.2 Discussion

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?

Less-than-significant impact. An increase in the use of existing parks and recreational facilities typically results from an increase in the number of housing units or residences in the area which could increase in the overall population that uses the nearby local and regional recreational facilities. The Project would not create additional housing or generate a permanent increase in the population (see Section 3.14, "Population and Housing"). The maximum number of daily guests and visitors to the Project site is anticipated to be 1,000. Guests and visitors would have access

to the surrounding recreational facilities described above in Section 3.16.1, "Existing Setting". The San Diego Bay waterfront provides many different parks, art installations, and other recreational facilities to serve the local population as well as tourists who frequent the area. These recreational facilities are designed to serve residents and visitors, and the incremental increase in use by guests generated from the Project would not rise to the level of causing or accelerating substantial physical deterioration or require new or expanded facilities to be constructed. Furthermore, no recreational facilities or parks would be closed during construction of the Project. The Project does not include construction or expansion of the recreational facilities that could have an adverse physical effect on the environment.

Operation of the Project would require an estimated 25 employees at any given time which would also be pulled from the local workforce. No outside labor is anticipated to be needed for operation of the Project that could increase the overall population of the Project area. As such, the additional employees and visitors would not increase use of local and regional recreation facilities such that substantial physical deterioration of existing facilities would occur or accelerate, or new or expanded facilities would be required. Therefore, the impacts would be **less than significant**, and no mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant recreation impacts; thus, mitigation measures are not required.

3.17 TRANSPORTATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation.				
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐
e) Result in an insufficient parking supply that would lead to a decrease in public coastal access?	☐	☐	☒	☐

3.17.1 Environmental Setting

The transportation impact analysis presented in this section is based primarily on the *Transportation Impact Study Vehicle Miles Traveled – SB 743 Analysis for the STAY OPEN San Diego Project* (TIS) prepared by Chen Ryan Associates (2021a, Appendix G). The TIS, which is included as Appendix G, provides additional data and information related to the transportation analysis. The parking impact analysis is based primarily on the *Parking Analysis Technical Memorandum* prepared by Chen Ryan Associates (2021b, Appendix H).

ROADWAY NETWORK

Access to the Project site is served by the surrounding roadway network which includes I-5, Kettner Boulevard, and Pacific Highway.

State Highways

The following state highway is operated and maintained by Caltrans and provides regional access to the Project site:

- **I-5** is a north-south freeway that traverses the United States from the Mexican to the Canadian border through the states of California, Oregon, and Washington. Within California, I-5 connects the major metropolitan areas of San Diego, Los Angeles, Sacramento and the eastern portion of the San Francisco Bay Area. Near the Project site, I-5 can be accessed via the Washington Street and I-5 interchange to the north of the Project site.

Roadways

The following roadways provide access to the Project:

- **Kettner Boulevard** is a one way three-lane roadway in vicinity of the Project site and is generally fronted by parking lots and car rental businesses. The posted speed limit near the Project site is 40 miles per hour (mph). Near the Project site, parking is generally permitted on the west side of the roadway. Sidewalks are present on both sides of the roadway; however, bicycle facilities are not present on either side of the roadway.

- **Pacific Highway** provides direct access to the Project site and is primarily a six-lane roadway with a raised median. North of the Project site, Pacific Highway is fronted by parking lots and the San Diego International Airport Rental Car Center. South of the Project site, Pacific Highway is fronted by the San Diego Air & Space Technology Center, as well as some parking lots and undeveloped parcels. Posted speed limit near the Project site is 35 mph. Near the Project site, parking is prohibited on both sides of the roadway. Sidewalks and Class II bicycle facilities are present along the corridor.

BICYCLE AND PEDESTRIAN FACILITIES

The bicycle and pedestrian transportation system in the City of San Diego is composed of local and regional bike lanes, bike paths, and bike routes. Bicycle facilities are classified as follows:

- Class I—off-street bike paths;
- Class II—on-street bike lanes marked by pavement striping;
- Class III—on-street bike routes that share the road with motorized vehicles;
- Bicycle Boulevard—local roads or residential streets that have been enhanced with traffic calming and other treatments to facilitate bicycle travel; and
- Cycle Track—bikeways located in roadway right-of-way but separated from vehicle lanes by physical barriers or buffers.

A complete network of pedestrian facilities (sidewalks) are present along all nearby streets in the vicinity of the Project site. Class II bicycle facilities are present along Pacific Highway.

TRANSIT SYSTEM

Railroad right-of-way consisting of four rail lines that serve the MTS San Diego Trolley, AMTRAK Pacific Surfliner intercity passenger rail, North County Transit District (NCTD) COASTER commuter rail, and freight rail service is located immediately to the east of the Project site. The Middletown Trolley Station located at Palm Street, between the Pacific Highway and Kettner Boulevard intersections, is approximately 900 feet southeast from the Project site. It serves as a stop for the Green Line Trolley. The Green Line Trolley has 15-minute headways during the morning and afternoon peak commute periods.

Senate Bill 743

The Senate Bill (SB) 743, passed in 2013, required the Governor's Office of Planning and Research (OPR) to develop new State CEQA guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any."

In December of 2018, OPR published the most recent version of the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) which provides guidance for VMT analysis. The Office of Administrative Law approved the updated State CEQA Guidelines and lead agencies had an opt-in period until July 1, 2020 to implement the updated guidelines as they related to VMT. As of July 1, 2020, implementation of Section 15064.3 of the updated CEQA Guidelines apply statewide.

The OPR Technical Advisory states that lead agencies may screen out VMT using project size, maps, transit availability, and provision of affordable housing. Many agencies use these screening thresholds to identify when a project should be expected to cause a less-than-significant impact without conducting a detailed study. These screening thresholds are identified below:

- *Small Project* – Projects that generate or attract fewer than 110 trips per day generally may be assumed to result in a less-than-significant transportation impact.

- *Map-Based Screening for Residential and Office Projects* – Residential and office projects located in areas with low VMT, and that incorporate similar features (i.e., density, mix of uses, transit accessibility), will tend to exhibit similarly low VMT. Maps created with VMT data, for example from a travel survey or a travel demand model, can illustrate areas that are currently below threshold VMT. Because new development in such locations would likely result in a similar level of VMT, such maps can be used to screen out residential and office projects from needing to prepare a detailed VMT analysis.
- *Presumption of Less Than Significant Impact Near Transit Stations* – Lead agencies generally should presume that certain projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT.
- *Presumption of Less Than Significant Impact for Affordable Residential Development* – Adding affordable housing to infill locations generally improves jobs-housing match in turn shortening commutes and reducing VMT. Further, low-wage workers in particular would be more likely to choose a residential location close to their workplace if one is available. In areas where existing jobs-housing match is closer to optimal, low-income housing nevertheless generates less VMT than market-rate housing. Therefore, a project consisting of a high percentage of affordable housing may be a basis for the lead agency to find a less-than-significant impact on VMT.

Parking and Public Access

The California Coastal Act, specifically Section 30252, requires new development within the Coastal Zone to maintain and enhance public access to the coast by providing adequate parking facilities or providing substitute means of serving the development with public transportation. In accordance with the California Coastal Act, a significant parking and public access impact would occur if the proposed project would result in an insufficient parking supply that, when considered with other modes of travel (e.g., bicycling, walking, transit use), would reduce the general public's access to the waterfront, as well as coastal commercial and recreational resources. To determine whether the proposed project would result in an insufficient parking supply, thereby inhibiting public coastal access, the analysis relies on the standards in the District's *Tidelands Parking Guidelines.*

3.17.2 Discussion

a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less-than-significant impact. Railroad right-of-way consisting of four rail lines that serve the MTS San Diego Trolley, AMTRAK Pacific Surfliner intercity passenger rail, NCTD COASTER commuter rail, and freight rail service is located immediately to the east of the Project site.

The location of the Project in close proximity to an existing transit station would meet the intent of the certified Port Master Plan as it relates to public transit which is to "encourage the provision or extension of the public transit system into the industrial, commercial and public recreational areas of the tidelands; and, where feasible, to encourage public transit service as a substitute for parking at tideland facilities" (District 2020:35). Additionally, the Project would diversify land uses and increase density in the area while providing easy and proximate access to the airport and existing nearby MTS transit service which would support a District land use objective for commercial land uses of providing convenient access from transportation terminals (District 2020:17). Therefore, the Project would be consistent with the intent of encouraging the access to and use of public transit as described in the Port Master Plan. The Project would likely increase the demand for transit in the area, primarily on the light rail trolley system (i.e., MTS San Diego Trolley). However, the Green Line Trolley has sufficient capacity to accommodate the additional riders anticipated to be generated by the Project. Therefore, the Project would not conflict with the District's Port Master Plan or any transit service or facilities in the area and existing transit services have sufficient capacity to serve the Project.

Continuous pedestrian facilities are present in the vicinity of the Project site and connect the Project to the Middletown Trolley Station, including sidewalks and a pedestrian rail crossing at Palm Street. Near the Project site, intermittent bicycle facilities are located along Pacific Highway. Class II bicycle facilities are located on the western side of Pacific Highway, and no bicycle facilities are located on the eastern side of the roadway in the immediate Project vicinity. Kettner Boulevard, located east of the Project site and railroad right-of-way, does not have any bicycle facilities present.

As identified in the City of San Diego's Bicycle Master Plan (December 2013), a cycle track along Pacific Highway is planned in the vicinity of the Project site, including a prioritized segment between the Ocean Beach bike path and Sassafras Street, just north of the Project site. However, the Project would not change the existing surrounding roadway network; and thus, would not conflict with this future bicycle facility. Additionally, the Project would include designated areas for shared transportation services, including scooters and bicycles. A total of 10 outdoor bicycle locks would be provided for use by guests and visitors.

For the reasons detailed above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system; and thus, would result in a **less-than-significant** impact and no mitigation is required.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to vehicle miles travelled?

Less-than-significant impact. State CEQA Guidelines Section 15064.3 was added on December 28, 2018, to address the determination of significance for transportation impacts, which requires VMT as the basis of transportation analysis instead of congestion (such as LOS). The change in the focus of transportation analysis is intended to shift the focus from congestion to, among other things, reduction in greenhouse gas emissions, encouraging mixed-use development, and other factors. State CEQA Guidelines Section 15064.3(b) identifies criteria for analyzing the transportation impacts of a project.

Section 15064.3(b)(4), "Methodology," explains that lead agencies, such as the District, have discretion to choose the most appropriate methodology to evaluate VMT subject to other applicable standards such as State CEQA Guidelines Section 15151 (standards of adequacy for EIR analyses).

In 2018, OPR released a Technical Advisory to provide advice and recommendations regarding assessment of VMT, thresholds of significance, and mitigation measures as they relate to the implementation of SB 743. The Technical Advisory notes that projects proposed within ½ mile of an existing major transit stop or an existing stop along a high-quality transit corridor generally may be presumed to cause a less-than-significant transportation impact unless project-specific or location-specific information indicates that the project would still generate significant levels of VMT. Public Resources Code (PRC) Section 21064.3 defines a major transit stop as a site containing an existing rail transit station, a ferry terminal served by either bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. PRC Section 21155 defines a high-quality transit corridor as a fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

The proposed project is located less than ½ mile from an existing rail transit service and bus transit service, is in close proximity to destinations (e.g., the waterfront, Downtown San Diego, Balboa Park), and is in close proximity to the airport, all of which inherently lower VMT. In addition, the project itself proposes to provide shared transportation services, including scooters and bicycles, thereby further reducing trip generation and VMT. The proposed project is expanding the existing Annex Building by nearly 200 percent (from approximately 10,923 square feet to 31,000 square feet) and the project proposes to utilize an existing paved parking lot for parking, landscaping, and a stormwater basin, and this parking lot area has historically been used as a parking lot (most recently by Park n' Fly and Budget Car Rental prior to that). Thus, the project is increasing the development intensity of an existing building that is less than ½ mile from an existing rail transit service and bus transit service, is in close proximity to destinations, and is in close proximity to the airport, which collectively lower VMT. Further, the proposed project is not a project that includes more parking for use by residents, customers, or employees than required by the jurisdiction, nor is it inconsistent with the Sustainable Communities Strategy.

Construction

Construction of the Project is expected to begin in June 2023 and end in August 2024 for a total duration of approximately 15 months. The average numbers of construction employees onsite would vary during the different stages of construction. To account for potential periods of phase overlap during the building construction stage, Project construction could require up to 65 construction workers onsite at one time.

Project construction activities would not result in long-term increases in vehicular trips because the construction would be temporary and intermittent in nature. Additionally, the VMT of construction workers is not newly generated; instead, it is redistributed throughout the regional roadway network based on the different work sites in which workers travel to each day. Therefore, construction workers are not generating new VMT each day, only redistributing it. This redistribution would be nominal and temporary; and thus, construction traffic is not expected to significantly increase VMT in the region.

Operations

The hotel would provide accommodations for up to 294 overnight guests with a variety of accommodation types including PODs and private rooms. The lobby indoor/outdoor bar and café and rooftop restaurant and bar would provide a total of 465 seats for guests and visitors. A maximum daily total of 25 employees would be needed to operate the Project.

The Project would promote the use of alternate forms of transportation by providing an interactive kiosk and a STAY OPEN smart phone application that would inform guests and visitors about available public transportation and shared transportation services in the area. Additionally, the Project would be located 900 feet from the Middletown Trolley Station, a stop along the Green Line Trolley. Continuous sidewalks are present in the vicinity of the Project site; thus, providing direct pedestrian access between the Project site and the Middletown Trolley Station without any barriers. The headway of the Green Line Trolley; which provides service south into the Downtown area and east to popular restaurant, retail, and recreational destinations; is 15 minutes during the morning and afternoon peak commute periods. Therefore, the Middletown Transit Station is considered a major transit stop as defined by PRC Section 21064.3. Thus, using guidance provided in the OPR Technical Advisory, because the Project is located within 0.5 mile of an existing major transit stop it is presumed to result in a less-than-significant VMT impact.

Summary

For the reasons detailed above, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3(b); and thus, would result in a **less-than-significant** impact to VMT and no mitigation is required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less-than-significant impact. The Project would not require the construction, re-design, or alteration of any public roadways. Vehicles would access the Project site from Pacific Highway. Before construction activities, the applicant would obtain the necessary construction-related traffic control permit from the City of San Diego to address any potential encroachment into the public right-of-way from planned construction activities.

All on site roadway improvements associated with the Project, such as a rebuilt driveway, would be constructed in accordance with District design and safety standards and City of San Diego design and safety standards (when in the right-of-way). Additionally, the Project is subject to the District's review process (and City of San Diego review process when in the right-of-way) which would ensure that that the Project design would comply with all applicable industry roadway/driveway design standards. Additionally, in accordance with District and industry-wide standards, the Project would provide adequate sight distance at all access points. Therefore, the Project would not substantially increase transportation-related hazards; and thus, would result in a **less-than-significant** impact and no mitigation is required.

d) Result in inadequate emergency access?

Less-than-significant impact. The Project would not require the construction, re-design, or alteration of any public roadways. Demolition and construction work would occur primarily within the vacant portion of the Annex Building

and on the building rooftop. Emergency access would be subject to review by the District and responsible emergency service agencies; thus, ensuring the Project would be designed to meet all applicable emergency access and design standards. Therefore, the Project would not result in inadequate emergency access; and thus, would result in a **less-than-significant** impact and no mitigation is required.

e) Result in an insufficient parking supply that would lead to a decrease in public coastal access?

The Project would provide 85 parking spaces for hotel and restaurant guests. Table 1 of the District's Tidelands Parking Guidelines identifies the required parking for new developments located within the District. However, the Tidelands Parking Guidelines do not have parking rates for hotels containing PODs; therefore, the "Hotel in districts other than Neighborhood Commercial1" land use parking rate was obtained from the City of San Francisco Municipal Code (SFMC), Article 1.5: Off-Street Parking and Loading, Section 151 for this project feature. The parking rate identified in this section of the SFMC for a hotel is has a minimum of zero parking spaces (none required) with a maximum of 1.5 parking spaces for each 16 guest bedrooms where the number of guest bedrooms exceeds 23. However, based on the location of the project site (e.g., near transit) as well as the characteristics of the PODs feature of the project, which is intended to provide lower cost overnight accommodations when compared to a hotel, a parking rate of one (1) parking space for each 16 guest bedrooms where the number of guest bedrooms exceeds 23 was utilized. The unadjusted parking demand for the Project is 82 parking spaces as shown in Table 3.17-1.

Table 3.17-1 Project Parking Demand - Unadjusted

Land Use	Units	Rate	Minimum Number of Auto Spaces (Base)
Hotel	17 rooms	0.6 per room	11
PODs	226 POD rooms	0.0625 per bed [a]	21
Hotel Restaurant	465 seats	0.12 per seat [b]	56
Total Unadjusted			**82**

Notes:

a City of San Francisco Municipal Code, Article 1.5: Off-Street Parking and Loading, Section 151.

b Parking requirements calculated utilizing number of seats as this is a more accurate indicator of the number of people expected to drive to the project site considering the higher population density surroundings and access to mass transit (trolley).

Source: Appendix H

However due to the Project's features and location, adjustment factors from the Tidelands Parking Guidelines were applied to the Project's parking demand. The adjustment factors are the Project's proximity to public transit (minus 3 spaces), access to SDIA (minus four spaces), and the airport shuttle service (minus 1 space). These adjustment factors reduce the Project's parking demand by a total of 8 spaces from 82 to 74 parking spaces (Appendix H). The Project would provide 85 vehicle parking spaces which exceeds the minimum parking requirement of 74 spaces. Therefore, the Project would not result in a decrease in public coastal access due to inefficient parking supply. The impact would **be less than significant**. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant transportation impacts; thus, mitigation measures are not required.

1 The SFMC identifies Neighborhood Commercial neighborhoods as neighborhoods with a mixed-use characteristic (residential & commercial). The proposed project does not include a residential component and therefore it is more appropriate to use a rate for an area that is *not* Neighborhood Commercial.

3.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. Tribal Cultural Resources.				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒
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?	☐	☐	☐	☒

3.18.1 Environmental Setting

AB 52, signed by the California Governor in September of 2014, established a new class of resources under CEQA: "tribal cultural resources," defined in PRC Section 21074. Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an EIR, negative declaration, or mitigated negative declaration. No California Native American tribes have requested notification for environmental review projects under CEQA within the District's jurisdiction.

A records search at SCIC was conducted for the Project site and quarter-mile radius to determine if tribal cultural resources are present within the Project site. No tribal cultural resources that are listed in or eligible for listing in the CRHR were identified during the records search. Additionally, a Sacred Lands File Search of the Project area was obtained from NAHC. No Sacred Lands were identified by the NAHC.

3.18.2 Discussion

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

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

No impact. The SCIC records search resulted in the identification of no tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, within the Project site including the construction staging area. Therefore, there would be **no impact.** No mitigation is required.

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?

No impact. No California Native American tribes have requested to be informed of projects by the District; therefore, there is no trigger to begin consultation under AB 52, resulting in no resources identified as tribal cultural resources under Public Resources Code Section 21074. Therefore, there would be **no impact.** No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with tribal cultural resources; thus, mitigation measures are not required.

3.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. Utilities and Service Systems.				
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

3.19.1 Environmental Setting

Water service is currently provided to the Project site by the Water Branch of the City of San Diego's Public Utilities Department. The City of San Diego relies on imported water supplies from the San Diego County Water Authority (SDCWA). Imported water from SDCWA accounted for about 89 percent on average from 2016 to 2020 (City of San Diego 2021c). SDCWA's water supplies include desalinated seawater, water transfers from the Imperial Irrigation District (IID), and imported (SWP and CRA) water purchased and delivered through MWD's system to San Diego County via the SDCWA aqueducts. Water is also sourced from local runoff from rainfall that is captured in the City's reservoirs and wastewater recycled for non-potable water demands at the City's water reclamation plants. Because of the City's reliance on imported water, the convergence of critical water supply issues has far-reaching implications for the City that requires long range and proactive planning (City of San Diego 2021c).

As part of the California Urban Water Management Planning Act and resulting California Water Code, an urban water supplier must prepare, adopt, and submit an Urban Water Management Plan (UWMP) to the California Department of Water Resources every 5 years. As a result, the City of San Diego is in the process of preparing the 2020 San Diego UWMP to develop a credible and balanced 20-year projection of water demand; update and improve the water demand forecast in the UWMP; adopt and integrate a Water Shortage Contingency Plan; and, utilize and build on the City's Sustainability Department's CAP.

The City of San Diego's UWMP reviews the City's historic and current water use projections and compares water supplies with demands over the next 25 years. The UWMP serves as a long-range planning document for water supply and demand and provides an overview of the City's water supply and usage, recycled water and conservation programs. Table 3.19-1, Table 3.19-2, and Table 3.19-3 provide a summary of the City of San Diego's existing and projected supply and demand for water.

Table 3.19-1 City of San Diego Projected Water Demand and Supply in a Normal Year

	Demand and Supplies (acre-feet per year)				
	2025	2030	2035	2040	2045
Water Demand (with wholesale and conservation) [a]	202,865	210,547	217,156	223,598	228,065
Local Water Supplies [b]	53,088	69,888	129,248	129,248	129,248
Water Supply from SDCWA (purchased water)	149,778	140,660	87,907	94,350	98,816
Total City Water Supplies	202,865	210,547	217,156	223,598	228,065
Estimated Water Shortages	0	0	0	0	0

[a] Includes consumptive use (retail and wholesale), NRW, conservation, and non-potable recycled water demands

[b] Local water supplies include recycled, non-potable water, Pure Water Phase 1 and 2, local surface supply, City-Lake Cuyamaca Interagency Agreement, and groundwater.

Source: City of San Diego 2021c

Table 3.19-2 City of San Diego Projected Water Demand and Supply in a Single Dry Year

	Demand and Supplies (acre-feet per year)				
	2025	2030	2035	2040	2045
Water Demand (with wholesale and conservation)[a]	210,169	218,128	224,973	231,648	236,274
Local Water Supplies[b]	54,931	71,731	131,091	131,091	131,091
Water Supply from SDCWA (purchased water)	155,238	146,397	93,882	100,557	105,183
Total City Water Supplies	210,169	218,128	224,973	231,648	236,274
Estimated Water Shortages	0	0	0	0	0

[a] Includes consumptive use (retail and wholesale), NRW, conservation, and non-potable recycled water demands

[b] Local water supplies include recycled, non-potable water, Pure Water Phase 1 and 2, local surface supply, City-Lake Cuyamaca Interagency Agreement, and groundwater.

Source: City of San Diego 2021c

Table 3.19-3 City of San Diego Water Demand in a Multiple Dry Year, Year 5

	Demand and Supplies (acre-feet per year)				
	2025	2030	2035	2040	2045
Water Demand (with wholesale and conservation) [a]	207,735	215,601	222,367	228,964	233,538
Local Water Supplies [b]	49,620	66,420	125,780	125,780	125,780
Water Supply from SDCWA (purchased water)	158,114	149,181	96,586	103,184	107,757
Total City Water Supplies	207,735	215,601	222,367	228,964	233,538
Estimated Water Shortages	0	0	0	0	0

[a] Includes consumptive use (retail and wholesale), NRW, conservation, and non-potable recycled water demands

[b] Local water supplies include recycled, non-potable water, Pure Water Phase 1 and 2, local surface supply, City-Lake Cuyamaca Interagency Agreement, and groundwater.

Source: City of San Diego 2021c

Wastewater treatment services are currently provided to the Project site by the City of San Diego's Public Utilities Department Wastewater Branch. Wastewater generated on the Project site is routed through the existing sewer system for treatment at the Point Loma Wastewater Treatment Plant (PLWTP), which is owned by the City of San Diego. The PLWTP currently treats approximately 175 million gallons per day (mgd) of wastewater that is generated in a 450-square-mile area by more than 2.2 million residents. Located on a 40-acre sites on the bluffs of Point Loma, the PLWTP has a treatment capacity of 240 mgd and a peak wet weather capacity of 432 mgd. In compliance with federal and State laws, treated effluent from the PLWTP is discharged to the Pacific Ocean through a 4.5-mile long ocean outfall off Point Loma (City of San Diego 2021c).

Solid waste generated at the Project site is collected by a City of San Diego-franchise waste hauler, EDCO, and transported to a local landfill. The waste hauler must be City of San Diego approved per San Diego Municipal Code Section 66.0101. City of San Diego-approved waste haulers are allowed to dispose of municipal solid waste at any of the landfills in San Diego County, but the City has the authority to direct waste to specific waste management facilities or prohibit the use of other waste management facilities to extend the capacity and useful life of the facilities for the general welfare of the community (San Diego Municipal Code Section 66.0129). West Miramar Landfill is closest to the Project site, approximately 7 miles to the northeast. The West Miramar Landfill currently has a maximum permitted throughput of 8,000 tons per day and a remaining capacity of 11,080,871 cubic yards (CalRecycle 2019a). The West Miramar Landfill receives about 3,900 tons of waste on weekdays and lesser amounts on Saturdays (City of San Diego n.d. d). Remaining daily capacity is therefore approximately 4,100 tons per day.

San Diego Gas & Electric (SDG&E) provides electrical power and natural gas to the Project site. SDG&E provides energy service to a population of 3.6 million people through 1.4 million electric meters and 873,000 natural gas meters within a 4,100-square-mile service area that includes San Diego and southern Orange County (SDG&E 2020).

3.19.2 Discussion

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

Less-than-significant impact. The Project would redevelop the existing Annex Building, which contains existing utility infrastructure, into a hotel. The Project would use these existing utility connections on the site, and operation of the hotel would not generate a utility demand that would require relocation of existing utilities or construction of additional utilities.

A 14-inch Vitrified Clay Pipe located east of the Annex Building would continue to be used to convey wastewater from the Project site (LFA 2021; Appendix I). This sewer line extends south through the eastern portion of the Annex Building and continues south parallel to the railroad right of way. Wastewater generated from the Project would be routed through this existing sewer line for treatment at the PLWTP. According to the City of San Diego, the PLWTP currently treats 175 mgd of wastewater generated by more than 2.2 million residents (City of San Diego 2021c). Furthermore, PLWTP has a treatment capacity of 240 mgd (City of San Diego 2021c). The Project is estimated to produce a peak wet weather flow of 0.022 cubic feet per second (cfs) which translates to 0.014 mgd, a fraction of the PLWTP's treatment capacity of 240 mgd. Furthermore, the Project's peak wet weather flow of 0.022 cfs also translates to a Ratio of Depth of Flow Pipe Diameter (dn/D) of 0.05, which is below the 0.5 dn/D minimum requirement for sewer flow outlined in the City of San Diego's Sewer Design Guide, and no upgrades to the existing City sewer system would be required from implementation of the Project (LFA 2021). Operation of the Project would not generate wastewater volumes that would exceed the capacity of the existing system.

The existing Annex Building sources potable water from a 12-inch water line that runs along Pacific Highway (LFA 2021). The Project would connect to this existing water line. Two fire hydrants are present on the Project site; one is located directly in front of the Annex Building and the other is located approximately 20 feet to the east. The fire flow from these two hydrants would provide adequate fire coverage for the Project (LFA 2021). The Project would have a

peak hour potable water demand of 621 gallons per minute (gpm), which is less than that existing 4,000 gpm minimum fire water demand available on the Project site. Therefore, no upgrades to the City's existing water system would be required. The availability of water supplies to serve the project is addressed in question (b) below.

As discussed above in Section 3.10, "Hydrology and Water Quality", the Project would not result in an increase in the volume of stormwater runoff that would exceed the capacity of the existing stormwater drainage system. The Project would increase the pervious surface on the site with the installation of the stormwater treatment basin to decrease the overall amount of runoff on the site. Therefore, the Project would not require the construction of expanded stormwater infrastructure due to increase volumes. The Project changes to the existing on-site storm drains (e.g., relocation of inlets within the Project site) would be appropriately sized and able to carry stormwater during a rain event in accordance with District standards and stormwater management requirements. Consistent with the City's storm drain design requirements, any storm drain installed along Pacific Highway would be at least 18 inches in diameter, and all newly installed storm drains would have the capacity to convey discharge from the Design Storm Frequency as defined in the City of San Diego's Drainage Design Manual (City of San Diego 2017).

Electric power is sourced from a 2.4 kilovolt (kV) line that passes runs between the Annex Building and the Administration Building. This power line connects to the Kettner Substation. Natural gas is sourced from a 4-inch gas main that runs along Sassafras to the northwest. SDG&E provides electrical power and natural gas to the City of San Diego and Project site. SDG&E currently services a population of 3.6 million people in San Diego and southern Orange County (SDG&E 2020). The Project is estimated to generate an electrical demand of 658 MWh/year and natural gas demand of 2,965 MMBtu/year (Appendix B). While the Project would contribute to the overall electricity and natural gas demand, given the current service territory of SDG&E, the Project site is already served with electrical and natural gas infrastructure and the Project would not generate demand for electricity or natural gas such that new or expanded existing electrical or natural gas infrastructure would be required. For the reasons described above, the Project would not generate a demand that would require new or expanded utility infrastructure that could cause significant environmental effects; the impact would be **less than significant**, and no mitigation is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less-than-significant impact. The Project is in the water service area of the City of San Diego. The City's estimated water supplies and demands in normal, single dry, and multiple dry years for 2025 are 202,865 acre-feet per year (AF/year), 210,169 AF/year, and 207,735 AF/year, respectively (City of San Diego 2021c; Table 3.19-2; Table 3.19-3; Table 3.19-4). These water demand projections of the City of San Diego Draft Urban Water Management Plan (February 2021) are based on growth projections for the City of San Diego water service area provided by SANDAG, based on its Series 14: 2050 Regional Growth Forecast. The growth forecast projections are based in part on existing and planned land uses of the agencies that manage land use in the region, including within the City's water service area. In 2020, the Commercial Institutional and Industrial sector, which includes hotels, accounted for 27 percent of water use within the service area. The population of the City's water service area is projected to increase by almost 91,000 people between 2020 and 2025, and by approximately 240,000 people between 2020 and 2045 (City of San Diego 2021c).

The Project's estimated water use would primarily result from the hotel component (a total of up to 294 beds: 226 beds within shared POD rooms that do not include bathroom or shower facilities and 68 beds within 17 private rooms that may include private bathrooms), shared bathrooms and shower facilities, restaurant and bar areas and associated kitchen space, a guest laundry area, and exterior irrigation for landscaping. The Project's average water demand would be 5.2 AF/year, and the peak hour water demand would be 28,456 gallons (LFA 2021). Moreover, the Project does not meet the requirements of a "water-demand project" requiring preparation of a project-specific water supply assessment because it does not have more than 500 rooms (CEQA Guidelines Section 15155[a](1)[D]). Given the Project's relatively negligible water demand of 5.2 AF/year compared to the City's projected water supplies during normal, single, and multiple dry year scenarios (202,865 AF/year, 210,169 AF/year, and 207,735 AF/year), there would be adequate water supply available to serve the Project and reasonably foreseeable future development in the City's service area. Furthermore, the City is planning to source water locally and rely less on the purchase of water through the SDCWA with planned and potential projects including the Pure Water San Diego Program to increase

the reliability of water supplies (City of San Diego 2021c). The Project would be required to obtain a Will-Serve letter for water supply from the City of San Diego before operations. Because there are adequate water supplies to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years, the impact would be **less than significant**, and no mitigation is required.

c) 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?

Less-than-significant impact. As discussed above in question a), the Project is estimated to produce peak wet weather flow of 0.014 mgd of wastewater, which is a fraction of PLWTP's treatment capacity of 240 mgd. In addition, the Project would be required to obtain a Will-Serve letter for wastewater service from the City of San Diego before operations. Therefore, the PLWTP would have adequate capacity to serve the Project's projected demand, in addition to the provider's existing commitments. Impact would be **less than significant** and no mitigation is required.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less-than-significant impact. Demolition and construction activities would generate up to 835 tons of demolition debris over the duration of Project construction. Given that the maximum permitted throughput of this landfill is 8,000 tons per day, the demolition debris generated from the Project would not be in excess of the existing total landfill capacity of 11,080,871 cubic yards or daily capacity of 4,100 tons per day. During construction, the Project proponent would comply with the City of San Diego Construction and Demolition Debris Ordinance which requires construction projects to pay a refundable construction and demolition debris recycling deposit, divert their debris by recycling, reusing, or donating reusable materials, and keep construction and demolition materials out of landfills (San Diego Municipal Code Article 6 Division 6). Furthermore, operation of the Project is estimated to generate 95 tons annually (Appendix B), which results in approximately 238 cubic yards annually and would not exceed West Miramar Landfill's remaining capacity of 11,080,871 cubic yards.

Materials that are not permitted to be disposed of at landfills and designated as hazardous, such as ACM, lead-based paint materials, and other building finishes would be disposed of by an approved hazardous waste handler at an appropriate waste facility in accordance with Title 22 CCR Division 4.5, *Environmental Health Standards for the Management of Hazardous Wastes*.

Construction and operation of the Project would be minimal compared to the remaining capacity the maximum permitted throughput of the West Miramar Landfill, and would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be **less than significant,** and no mitigation is required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less-than-significant impact. The Project would comply with applicable local, state, and federal solid waste disposal standards including applicable elements of the Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 239 to 282), the Toxic Substances Control Act (15 U.S.C. Section 2601 et seq.), the California Department of Toxic Substances Control's hazardous waste regulations (CCR, Title 22, Division 4.5), and the Integrated Waste Management Act (AB 939). The RCRA gives the U.S. Environmental Protection Agency the authority to manage the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also set forth a framework for the management of non-hazardous solid wastes (EPA 2020a). The Toxic Substances Control Act and the California Department of Toxic Substances Control's hazardous waste regulations control human and environmental exposures for numerous chemical substances and mixtures that may be present in solid waste (EPA 2020b; DTSC 2021b). The Integrated Waste Management Act (AB 939) requires the state to divert 50 percent of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (CalRecycle 2019b).

Demolition materials would be disposed of at the West Miramar Landfill while a recycling program would be implemented for operation of the hotel as required by the City of San Diego's Recycling Ordinance and consistent with AB 939 (1990) and AB 341 (2011). The Project would comply with the City of San Diego Construction and Demolition Debris Ordinance as described in question d) above. As such, the Project would comply with federal, state, and local statues and regulations related to solid waste. Impacts would be **less than significant** and no mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with utilities and service systems; thus, mitigation measures are not required.

3.20 WILDFIRE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Wildfire.				
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?	☐ Yes		☒ No	
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

3.20.1 Environmental Setting

The Project site is not located in or near state responsibility areas classified as Very High Fire Severity Zones (FHSZs) by the California Department of Forestry Resources (CAL FIRE) (CAL FIRE 2020a). The Project site is located within a local responsibility area designated as a non-Very High FHSZ by the City of San Diego (City of San Diego 2009, CAL FIRE 2020b). However, approximately 0.25 mile east, on the other side of I-5, are local responsibility areas designated as Very High FHSZ in portions of Midtown and Park West. Further east, in Balboa Park, are additional local responsibility areas designated as Very High FHSZ (City of San Diego 2009).

3.20.2 Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less-than-significant impact. The Project is not located in or near state responsibility areas classified as Very High FHSZs. In addition, as described above in Section 3.9 Hazards, response f) compliance with the traffic control permit would maintain access and connectivity during construction, and the Project would not substantially impair evacuation or emergency response plans outlined in the EOP or other local emergency response plans. Once construction is complete, the Project would operate similar to its pre-construction condition, and no permanent changes to public rights-of-way would occur that could substantially impair implementation of the EOP or other

adopted emergency response plans. Because adequate access would be maintained throughout construction activities, this impact would be **less than significant**, and no mitigation is required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less-than-significant impact. The Project site is in a highly developed portion of the City of San Diego surrounded by airport-related commercial and industrial land uses. No wildland areas are within the vicinity of the Project site, and the City of San Diego classifies the Project area as non-Very High FHSZ (City of San Diego 2009, CAL FIRE 2020b). Local responsibility areas classified as Very High FHSZ are approximately 0.25 mile east of the Project site in portions of Midtown and Park West, and further east in Balboa Park (City of San Diego 2009, CAL FIRE 2020b). However, given that the major interstate highway, I-5, along with various developed land separate the Project site from these high fire hazard zones, the potential for exacerbated wildfire risks from construction or operation of the Project would be **less than significant**, and no mitigation is required.

c) Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No impact. The Project would redevelop the existing Annex Building and a portion of the adjacent parking lot into a hotel. The existing on-site utility infrastructure that served the Annex Building (i.e., water supply, wastewater, electricity and natural gas, and storm water) would be used to serve the Project. A storm water treatment basin would be installed in the southern portion of the parking lot, and all other on-site utilities would be installed underground with the exception of transformer boxes and cabinet facilities. The Project would adhere to all safety requirements for the transformer boxes, cabinet facilities, and all other utility infrastructure that could pose a fire risk. Because the Project would use the existing utility infrastructure, most new utilities would be installed underground, and all safety requirements for new aboveground utility infrastructure would be adhered to, exacerbated fire risks would be minimal. Therefore, **no impact** would occur. No mitigation is required.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No impact. The Project is in an area of predominantly flat terrain and would not involve slope changes that could expose people to risks of flooding from post-fire instability. The Project would involve some changes to the existing parking lot. However, the existing drainage conditions would be improved with the construction of a 5,000-square-foot storm water treatment basin at the southern end of the parking lot that is currently asphalt. Furthermore, the Project would increase the pervious surface on the Project site by 11,000 square feet and drought tolerant plants and shade trees would be installed along with the storm water treatment basin to assist with stormwater drainage during storm events. Therefore, implementation of the Project would not expose people or structure to significant risks as a result of runoff, post-fire slope instability, or drainage changes. **No impact** would occur. No mitigation is required.

REQUIRED MITIGATION MEASURES

The Project would not result in significant impacts associated with wildfire risks; thus, mitigation measures are not required.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. Mandatory Findings of Significance.				
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, 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?	☐	☒	☐	☐

3.21.1 Environmental Setting

State CEQA Guidelines Section 15130 requires that an environmental impact report include discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable", which means that the incremental effects of an individual project are significant when viewed in connection with the effects of past, current, and probable future projects.

State CEQA Guidelines Section 15130(b) identified the following three elements that are necessary for an adequate cumulative analysis:

- A list of past, present, and probable future projects producing related or cumulative impacts, including those projects outside the control of the lead agency, or a summary of projections contained in an adopted general plan or related planning document that describes or evaluates conditions contributing to the cumulative effect.
- A summary of expected environmental effects to be produced by those projects. The summary shall include specific reference to additional information stating where the information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects and an examination of reasonable options for mitigating or avoiding any significant cumulative effects.

A list of past, present, and probable future projects is provided in Table 3.21-1. Past projects for this document are defined as those that were recently completed (within the last 5 years) and are now operational. Present projects are defined as those that are under construction but not yet operational. Probable future projects are defined as those for which a development application has been submitted or credible information is available to demonstrate that

project development is the probable outcome. Projects were identified based on publicly accessible information on the District website, the SDIA website, the City of San Diego website, and communications with District staff members.

Projects were selected based on their location within the cumulative study area for the Project and the potential to cause impacts related to the impacts of the Project. The geographic scope of the cumulative impact analysis area varies based on the environmental topic. The study area for each environmental topic is described under the environmental topic headings below.

Table 3.21-1 Cumulative Projects

No.	Project Name	Location	Description	Status
1	SDIA Master Plan-Parking Plaza	3225 North Harbor Drive, San Diego, CA	A parking plaza adjacent to Terminal 2 on SDIA was constructed in 2018. The parking plaza is a three-story, 1,035 million-square-foot approximately 34–48-foot-high parking structure with 1,753 new parking spaces, for a total of 3,076 parking spaces. A total of 46 palm trees were removed, and the area was landscaped and graded 34,400 cubic yards.	Completed
2	Lane Field North and South	North side of Broadway between North Harbor Drive and Pacific Highway, San Diego, CA 91910	Two hotels totaling 800 rooms, parking facilities, and retail uses on a 5.8-acre parcel formerly used as a parking lot. Construct park/plaza on western 150-feet of property. Construction was completed in 2018.	Completed
3	United Airlines Hangar and Terminal Relocation and Preservation	Palm Street/Pacific Highway/Admiral Boland Way, San Diego, CA 92101	The United Airlines Hangar and Terminal (UAHT) building was originally constructed along Pacific Highway in 1931 as a Spanish Revival/Modernistic-style hangar and terminal for Pacific Air Transport/United Airlines, until it was moved to its current location in 1952 at the San Diego International Airport. The UAHT building, totaling 8,216 square feet, has been in continuous use for airport support purposes and will be relocated and preserved on the north side of the airport (north end of an existing paved parcel at the corner of Pacific Highway and Palm Street), very close to its original location along Pacific Highway. The structure will continue to be used for airport support purposes.	Anticipated to be disassembled in current location in Fall 2021 and relocated and reassembled in 2022.
4	Portside Pier Restaurant Redevelopment Project [a]	1360 North Harbor Drive, San Diego, CA 92101	Redevelopment of an existing waterfront restaurant with a new facility, including new pilings, piers, decking, and structure. The new facility is approximately 33,577 square feet and includes three distinct dining establishments, a coffee and gelato shop, an expanded dock and dine for short-term boat berthing, and a public viewing deck. Restaurant seating increased by 464 seats. A new public viewing deck with approximately 108 seats was constructed and the replacement dock and dine boat dock allows for an increase in boat slips from 2 to 12 boat slips. Construction was completed in 2020.	Completed
5	SDIA – International Arrivals Facility	3225 North Harbor Drive, San Diego, CA	The new International Arrivals facility at SDIA features six international gates, an expanded baggage claim and passenger wait area, and two public artworks. The 130,000 square-foot facility was completed in June 2018.	Completed

No.	Project Name	Location	Description	Status
6	Sunroad Hotel	East Harbor Island	The Sunroad Hotel would have 450 rooms, a 12-level wing with extended stay rooms, and a 15-level wing with limited-service rooms. Amenities open to the public would include a walk-up restaurant and bar area accessible via the sidewalk on Harbor Island Drive, a 15-foot wide promenade, interior pathways, and an open space area. There will also be retail shops, parking, and temporary and permanent mini destinations to draw people to and through the hotel and amenities, mobile carts for retail/specialty items and/or food, and game/exercise spots.	Board of Port Commissioners approved an Option to Lease Agreement (Option) for the project as well as an Addendum to the 2014 Revised Final Environmental Impact Report in 2021. Expected to begin construction in late 2023.
7	Pacific Beach Pipeline South	Along Midway/Pacific Highway Corridor and Mission Bay Areas	The project is replacing 38,725 linear feet of an existing water main and 6,731 linear feet of existing VC sewer main to new 16-inch PVC mains with the abandonment of the Pacific Beach Reservoir, which is no longer in use.	Most construction was completed in 2020 and the project is anticipated to be complete by the end of 2022.
8	B Street Shore Power Project	B Street Pier and 1140 and 1000 North Harbor Drive	Project consists of infrastructure components to provide shore power to existing terminal operations at the B Street and Broadway Piers (three berths) with the result of reducing air pollutant emissions and greenhouse gas emissions while cruise ships are berthed. Initially, shore power will be available to one ship at a time; in subsequent years, two ships will be able to use shore power at the same time.	CEQA document approved; divided into phases, and Phase 2 construction anticipated in 2022
9	B Street Cruise Ship Terminal Maintenance Projects [a]	B Street Pier 1140 North Harbor Drive	Projects on the B Street Pier are required to address routine maintenance requirements to improve safety, security, integrity, aesthetics, and comfort of this facility. Roof replacement, canopy improvements, roll-up and rolling rate doors installation, fire system upgrades, clean and paint ceilings and hangers, mobile gangway and platform painting, and a photovoltaic system	Currently in project design and review
10	Harbor Island West Marina Redevelopment [a]	2040 Harbor Island Dr, San Diego, CA 92101	Landside improvements include: demolish and replace on-site buildings, parking lot, and landscaping; reconstruct public viewing deck and construct new promenade. Waterside improvements include: demolish existing docks providing 620 boat slips and construct new docks providing 603 boat slips.	Under environmental review.
11	San Diego Symphony Bayside Performance Park [a]	Portion of Embarcadero Marina Park South, 224 Marina Park Way	The project includes: park enhancements such as the replacement and enhancement of public park amenities throughout Embarcadero Marina Park South, provision of public access enhancements, and installation of a permanent performance stage and event venue ("Bayside Performance Park") within a portion of Embarcadero Marina Park South. Following project construction, Embarcadero Marina Park South would continue to be operated by the District, with the exception that the Bayside Performance Park portion would be operated and maintained by the project applicant, the San Diego Symphony Orchestra Association.	Environmental review completed in 2018; Project opening Summer 2021.

No.	Project Name	Location	Description	Status
12	SDIA Terminal 1 Redevelopment Project	3225 North Harbor Drive, San Diego, CA	The project includes replacement of the aging and outdated SDIA Terminal 1 and related improvements.	The Final EIR for the project was certified in January 2020 and construction is scheduled to begin in late 2020.
13	SDIA Northside Development Projects	3225 North Harbor Drive, San Diego, CA	SDIA completed a series of improvements to the north side of the airport including a receiving a distribution center that was completed in 2021, a fixed-base operator complex that was completed in 2014, a rental car center, and roadway improvements.	Completed
14	Hillcrest Focused Plan Amendment	Hillcrest and Medical Complex neighborhoods	City led community plan amendment for an approximate 380-acre area in the Hillcrest and Medical Complex neighborhoods to identify additional housing opportunities, public spaces, and mobility improvements.	The amendment is currently under review and is expected to be brought forward to hearing by the end of 2022.
15	Scripps Mercy Hospital Renovation Project	4077 Fifth Ave, San Diego, CA	Renovation of the Scripps Mercy Hospital would include replacing the existing acute care building with a new 710,000-square-foot, seismically sound tower featuring 12 stories above ground and three below. Most of the rooms in the hospital will be private. Other work includes upgrades to the central energy plant.	Construction of the replacement tower is expected to begin in 2022 and finish in 2027.
16	Central Mobility Hub (CMH) Project	Midway Community	Central Mobility Hub Project is envisioned as a multimodal transportation center with numerous connections to regional transit lines, a high-frequency transit connection service to SDIA, and a curb drop-off for auto-based travelers.	Environmental review is ongoing for the project. The San Diego Association of Governments released the Notice of Preparation of the Draft EIR on April 21, 2021.
17	Stay SDP	2801 India Street	The project would demolish an existing trailer/shed and parking lot located on a 0.35-acre site at 2801 India Street in the MCCPD-CL-6 Zone of the Mid-City Community Planned District, within the Uptown Community Planning Area, to construct a 22,141-square foot, three-story hotel consisting of 25 suites with balconies, a new roof deck and a subterranean garage.	The site development permit for the project was issued by the City of San Diego in 2018 and the project is currently in the planning phase.
18	Navy Broadway Complex	Broadway/Harbor Drive/Pacific Highway, San Diego, CA 92101	Redevelopment of a 13.7-acre parcel with a 2.9 million square foot museum; 213,000-square feet of retail and restaurant space; 3,100 parking spaces; and a 1.9-acre public park at the corner of Broadway and Harbor Drive.	Development Agreement, Master Plan, Phase I Buildings Consistency Determination approved in 2009, Construction began 2017, still under construction

[a] Project information provided by the District.

Sources: SDIA 2015 SDIA 2018a; SDIA 2018b; SDIA n.d. a; SDIA n.d. b; SDIA n.d. c; District n.d. b; District n.d. c; District 2021d; City of San Diego n.d. e; City of San Diego n.d. f; City of San Diego n.d. g; SANDAG 2021; Scripps Health 2017

3.21.2 Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?

Less-than-significant impact with mitigation. The Project site is fully developed containing the District's existing Annex Building. As discussed above in Section 3.18, "Tribal Cultural Resources", no resources eligible for listing in the California Register of Historical Resources or in a local register of historical resources are present on the Project site. As discussed in Section 3.5, "Cultural Resources", there is a potential that historic-period archaeological resources could be unearthed during ground-disturbing construction activities. Damage of yet undiscovered archaeological resources as defined in State CEQA Guidelines Section 15064.5 would be a potentially significant impact. Mitigation Measure CUL-1 would be implemented to require (1) a halt to nearby construction and an evaluation of any historic-period archaeological resources are discovered and (2) consideration of preservation options and proper curation if significant artifacts are recovered. As such, with implementation of Mitigation Measure CUL-1, the Project would not eliminate important examples of the major periods of California history or prehistory.

As described above in Section 3.4, "Biological Resources", potential impacts to wildlife species and bird habitat would be limited to short-term disturbances at the Project site associated with construction. Most special-status wildlife species are not expected to occur on the Project site due to the lack of suitable habitat. Mitigation Measure BIO-1 would require compliance with the MBTA which would avoid loss of common nesting birds. Therefore, the Project would not significantly 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. Impacts would be **less than significant with mitigation**.

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.)

Less-than-significant impact. Because the Project would have no impact on agriculture and forest resources, mineral resources, and tribal cultural resources, it would have no potential to contribute to significant cumulative impacts related to those resource areas. The Project would have less-than-significant impacts on aesthetics, air quality, energy, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, , utilities and service systems, and wildfire. With mitigation, the Project would have a less-than-significant impact on geology and soils, biological resources, and cultural resources. The Project would not result in any significant and unavoidable impacts. Analysis of the Project's cumulative effects is provided below for each environmental topic addressed in Sections 3.1 to 3.20 of the checklist.

<u>Aesthetics</u>

As described in Section 3.1, "Aesthetics", the Project would have no impact on scenic vistas and, therefore, would not contribute to any potentially significant cumulative impacts related to scenic vistas. The Project would have a less-than-significant impact related to scenic resources within a state scenic highway, conflicts with zoning and other regulations governing scenic quality, and creating new sources of light and glare. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to those topical areas. The cumulative study area for aesthetics includes the Project site and surrounding areas with views of the Project site.

Past, Present, and Probable Future Projects

Past projects are developed and operational and do not degrade scenic quality because they were developed pursuant to applicable zoning, regulations, and policies of the District, City of San Diego, and San Diego County Regional Airport Authority governing scenic quality and light and glare. Present and probable future projects would have varying degrees of construction-related aesthetic impacts; however, the temporary presence of construction equipment and vehicles is not uncommon in the urban setting, and they do not produce a substantial amount of glare during the day or light during the night. Once operational, all projects would not be expected to result in adverse change to the surrounding aesthetics because future projects would be required to comply with applicable zoning, regulations, and policies of the District, City of San Diego, and San Diego County Regional Airport Authority governing scenic quality and light and glare. Cumulative projects would not obstruct views of San Diego Bay from I-5 (an eligible State scenic highway) in the vicinity of the Project site. Therefore, the impact on aesthetic resources from past, present, and probable future projects is not cumulatively significant.

Project

The Project's aesthetic effects include increasing the building height by adding an additional floor and light and glare changes associated with operation of the hotel, which would be visually consistent with the surrounding land uses. Implementation of the Project would also include the development and approval of a PMPA to change the land use designation from Aviation Related Industrial to Commercial Recreation to allow for hotel use. This land use designation change would not affect regulations governing the scenic quality of the area because the existing land use designation allows for various forms of commercial and industrial use related to airport operations. Operation of the Project would be visually similar to surrounding land uses. The Project would comply with District and City of San Diego policies and regulations that protect scenic quality and avoid creation of substantial new sources of light and glare. The Project would not obstruct any scenic vistas including views of San Diego Bay from the nearby segment of I-5, which is an eligible state scenic highway. Therefore, the Project's incremental contribution to cumulative aesthetic impacts would not be cumulatively considerable such that a new significant cumulative aesthetic impact would occur.

Air Quality

As described in Section 3.3, Air Quality, the Project would have a less-than-significant impact on: conflicting with implementation of an applicable air quality plan; resulting in a cumulative net increase of any criteria pollutant for which the Project is in nonattainment for; exposing sensitive receptors to substantial pollutant concentrations; and resulting in other emissions that could adversely affect a substantial number of people. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to those topical areas. The cumulative study area for air quality is the SDAB which encompasses all of San Diego county.

Past, Present, and Probable Future Projects

The SDAB is currently designated as nonattainment with respect to the NAAQS and CAAQS for ozone, and the CAAQS for PM_{10} and $PM_{2.5}$. Therefore, emissions of concern are ozone precursors, PM_{10}, and $PM_{2.5}$. The nonattainment status for the SDAB is inherently cumulative and the cumulative projects listed in Table 3.21-1 could contribute to this nonattainment status. However, all projects within the SDAB are required to comply with the Attainment Plan which includes measures and thresholds to reduce emissions of VOCs and NO_x, both ozone precursors, with the goal of ultimately achieving attainment status with respect the NAAQS and CAAQS. Furthermore, SDAPCD's established trigger levels were developed as a metric to indicate whether a project's emissions would cumulatively contribute to the nonattainment designations in the SDAB, therefore cumulative projects that have projected emissions below the SDAPCD's trigger levels would not cumulatively contribute to the nonattainment within the SDAB. Cumulative projects have the potential to expose sensitive receptors to substantial pollutant concentrations when located close to residential dwellings, schools, hospitals, playgrounds, and other areas with populations of sensitive receptors. The Project is not located close to sensitive receptors, therefore past, present, and probable future projects close to the Project site would not lead to a cumulative effect on sensitive receptors from pollutant concentrations. For these reasons, the impact on air quality from past, present, and probable future projects is not cumulatively significant.

Project

The Project would be consistent with the Attainment Plan because it would not result in an increase in the residential population. Both the short-term construction and long-term operation of the Project would not generate emissions of criteria air pollutants or precursors that would exceed SDAPCD's established trigger levels, which were developed as a metric to indicate whether a project's emissions would cumulatively contribute to the nonattainment designations in the SDAB. Furthermore, the Project would not expose sensitive receptors to substantial pollutant levels due to the dispersive properties of diesel PM, the relatively low mass diesel PM emissions that would be generated in one place during the construction and operation of proposed land uses, and the relatively short construction period of the Project. Minor odors from the use of heavy-duty diesel equipment during Project construction activities would be intermittent and temporary, would dissipate rapidly from the source with an increase in distance, and would not result in an odor-related impact. Therefore, the Project's incremental contribution to cumulative air quality impacts would not be cumulatively considerable such that a new significant cumulative air quality impact would occur.

Biological Resources

As described in Section 3.4, "Biological Resources", the Project would have no impact on riparian habitat, other sensitive natural communities, or state or federally protected wetlands. The Project would not interfere substantially with the movement of fish or wildlife species or conflict with the provisions of an adopted local, regional, or state habitat conservation plan. The Project would have a less-than-significant impact on conflicting with City's ordinances that protect street trees. The Project was also have a less-than-significant impact on Mexican long-tongued bat and common bat species that could roost in buildings and the pedestrian bridge. However, during the reconnaissance survey of the Project site bat roosts were not observed. In addition, maternity season (summer) is considered the most sensitive period for roosting bats. Because Mexican long-tongued bat occurs in the San Diego area primarily during the fall and winter, outside of the sensitive maternity season, roosts are not expected to occur on or near the Project site and construction activities would not adversely affect this species. The Project site is located in an urban area with limited foraging habitat and the vacant Annex building, if used, would provide low-quality artificial, temporary roost habitat for Mexican long-tongued bat and common cavity-roosting bats. Mitigation Measure BIO-1 would require compliance with the MBTA which would avoid loss of common nesting birds that could nest in landscaping vegetation on the Project site. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to conflicting with City's ordinances that protect street trees and impacting species identified as a candidate, sensitive, or special-status species. The cumulative study area includes the Project site and the surrounding communities of the City of San Diego.

Past, Present, and Probable Future Projects

Other cumulative projects close to the Project site and in the greater San Diego area could have the potential to conflict with the City's ordinances that protect street trees and bat and native bird species. Mexican long-tongued bat is a CDFW species of special concern, and any project subject to compliance under CEQA is required to analyze impacts to species of special concern, and if necessary, provide measures to mitigation significant impacts (Section 15380 of the State CEQA Guidelines). For this reason, potential adverse impacts to Mexican long-tongued from cumulative projects bat would be less than significant with implementation of feasible mitigation. Furthermore, native bird species are protected under the MBTA and Section 3503 of the California Fish and Game Code. Cumulative projects with the potential to adversely affect bird species would be required to comply with applicable federal and state regulations that protect birds and their nests.

Cumulative projects necessitating the removal of designated street trees within the City of San Diego would be required to submit a permit application for removal of the street tree. The application would include a detailed site plan that describes the replanting of street trees consistent with the community's street tree plan or match the existing species in the community. Cumulative projects would be required to comply with the City of San Diego requirements for removal and planting of new street trees per San Diego Municipal Code 62.0600. Therefore, the impact on biological resources from past, present, and probable future projects is not cumulatively significant.

Project

Project construction activities during the bird breeding season (generally February 1 through September 15), including demolition, micro piledriving, and presence of construction equipment and crews, could generate noise and visual stimuli that may result in disturbance to active bird nests, if present, potentially resulting in nest abandonment or forced fledging and subsequent loss of fertile eggs, nestlings, or juveniles. Project construction would also include removal of ornamental landscape trees and shrubs and therefore has the potential to result in direct removal of bird nests. The Migratory Bird Treaty Act (MBTA) makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers, or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Nevertheless, because destruction of any listed migratory bird nest is a violation of the MBTA and Sections 3505, 3503.5, and 3800 of the California Fish and Game Code also prohibit the take, possession, or destruction of birds, their nests, or eggs, Mitigation Measure BIO-1 is proposed to require compliance with these regulations and avoid loss of common nesting birds. Before construction activities would be permitted to occur during bird breeding season, Mitigation Measure BIO-1 would require that any active nests in the construction area or vicinity be identified and avoided or monitored so that nest abandonment and loss of eggs or young would not occur. The Project would comply with City's ordinances that protect street trees and would be required to obtain a permit before the removal or replacement of any designated street tree. Therefore, the Project's incremental contribution to cumulative biological impacts would not be cumulatively considerable such that a new significant cumulative biological impact would occur.

Cultural Resources

As described in Section 3.5, "Cultural Resources", the Project would have no impact on the significance of a historical resource pursuant to section 15064.5. The Project would have a less-than-significant impact on disturbing human remains, including those interred outside of formal cemeteries, and with mitigation, the Project would have a less than significant impact on the significance of an archaeological resource pursuant to Section 15064.5. Therefore, the analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to adversely changing the significant of archaeological resources and disturbing human remains. The cumulative study area is the Project site and a quarter-mile radius around the Project site, consistent with the cultural records search obtained from the SCIC.

Past, Present, and Probable Future Projects

The projects within a quarter mile of the Project site are located on the same harbor-fill found on the Project site (USDA 2011). Therefore, archaeological resource discovery is limited to built-environment architectural features and historic-period archaeological sites (primarily trash scatters and abandoned railroad grades). Cumulative projects could have the potential to unearth historic-period archaeological resources during ground-disturbing activities, however monitoring during these ground-disturbing activities would likely reduce impacts to less than significant. Ground disturbing activities associated with cumulative projects also have the potential to uncover human remains, however, all projects are required to comply with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 which would avoid or minimize the disturbance of human remains and appropriately treat any remains that are discovered. For this reason, the impact on the discovery of human remains from cumulative projects would not be cumulatively significant.

Project

The Project has the potential to impact historic-period archaeological resources during ground-disturbing construction activities given the history of the Project site and the proximity to the railroad line. However, the impact would be reduced to less than significant with implementation of mitigation measure CUL-1. With implementation of Mitigation Measure CUL-1, the project applicant would be required to prepare and provide a Worker Awareness Training Pamphlet to all construction personnel and supervisors who have the potential to encounter cultural resources. In the event of a historic-period archaeological site is unearthed during construction of the Project, a qualified archaeologist would be retained to assess the significance of the find as required by Mitigation Measure CUL-1. This mitigation measure would reduce impacts to archaeological cultural resources to a less-than-significant level by requiring preservation options and proper curation if significant artifacts are recovered. Ground disturbing activities associated with Project could unearth buried human remains or unknown cemeteries in areas with little or

no previous disturbance. However, compliance with California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097 would provide an opportunity to avoid or minimize the disturbance of human remains, and to appropriately treat any remains that are discovered, and the impact would be less than significant. Therefore, the Project's incremental contribution to cumulative cultural impacts would not be cumulatively considerable such that a new cumulatively significant cultural resources impact would occur.

Energy

As discussed in Section 3.6, "Energy" the Project would have a less-than-significant impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. Furthermore, the Project would have a less-than-significant impact on conflicting or obstructing with a state or local plan for renewable energy or energy efficiency. Therefore, the analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these two issue areas. The cumulative study area is the SDG&E service area which encompasses the San Diego region and southern Orange County.

Past, Present, and Probable Future Projects

Construction associated with cumulative projects could lead to a temporary increase in fuel and energy consumption. However, it is anticipated that fuel would not typically be consumed in a wasteful manner during construction of individual projects, as it is in the interest of construction contractors to meet project schedules and minimize costs. This translates to various efficiencies, including in the use of energy resources. Furthermore, State regulations require a higher proportion of electricity to be generated from zero carbon electricity sources and energy efficiency measures would be integrated into new construction and existing buildings for future cumulative projects. Cumulative projects' gasoline and diesel consumption would also be subject to State and federal regulations regarding fuel efficiency standards for vehicles. Therefore, cumulative impacts related to energy would not be significant.

Project

The energy needs for Project construction would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. Operation of the Project would encourage reduced fuel consumption by providing shared transportation services. In addition, the Project's gasoline and diesel consumption would be subject to State and federal regulations regarding fuel efficiency standards for vehicles. The Project would be designed to meet all applicable California Energy Code standards, which establish minimum standards related to various building features, including appliances, water and space heating and cooling equipment, building installation and roofing, and lighting. Redevelopment of the southern half of the existing Annex Building would make that portion of the building consistent with current Energy Code (2019 version at a minimum). The Annex building was originally constructed in 1959 so the redevelopment would significantly improve the energy efficiency of the building. Therefore, the Project's incremental contribution to cumulative energy impacts would not be cumulatively considerable such that a new significant cumulative energy impact would occur.

Geology and Soils

As discussed in Section 3.7, "Geology and Soils", The Project would have no impact on directly or indirectly causing potential adverse effects from landslides and septic/alternative waste disposal systems. The Project would have a less-than-significant impact on directly or indirectly causing potential adverse effects from the rupture of a known earthquake fault and seismic shaking. Furthermore, the potential impact from substantial soil erosion or the loss of topsoil; direct or indirect risks to life or property from being located on expansive soil; directly or indirectly destroy a unique paleontological resource or site or unique geologic feature would be less than significant. With mitigation, the Project would have a less-than-significant impact on causing potential adverse effects from strong seismic ground shaking and landslide, lateral spreading, subsidence, liquefaction, or collapse from being located on an unstable geologic unit or soil. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to seismic ground shaking, seismic-related ground failure, soil erosion, impacts related to unstable soils and expansive soils, and paleontological resources. The study area for the geology and soils cumulative analysis includes the Project site and surrounding cumulative projects located on similar soils and geologic formations.

Past, Present, and Probable Future Projects

Cumulative projects would not increase potential hazards associated with geology and soils because they would not cumulatively increase the potential for harm to people or damage to structures when considered together. Geology and soils impacts may be related to increased exposure to seismic hazards and increased risks associated with landslide, soil expansion, and subsidence. These effects would occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Because these effects are generally localized, they typically do not combine to result in greater cumulative impacts. Existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for effects from construction or operation of projects related to geology, soils, and seismicity. For example, construction of future projects would be subject to applicable codes and regulations and seismic safety requirements and recommendations contained in project-specific geotechnical reports. It is anticipated, therefore, that any potential impacts associated with geologic and soil conditions would be mitigated within the respective sites of these future projects. All projects that include habitable elements incorporate the geotechnical and structural requirements of the adopted California Building Code. These measures would reduce damage from geologic hazards, such as ground shaking, liquefaction, soil erosion, and lateral spreading, by ensuring that soils would be suitable for a building foundation and requiring the use of materials and techniques that significantly reduce the potential for serious damage to new structures. Several projects in the cumulative study area are located on underlying formations (e.g., Bay Point Formation) that have high potential for containing paleontological resources. Projects that propose cut depths into the underlying formation would have potentially significant impacts on fossil resources. Mitigation that requires monitoring would reduce impacts on paleontological resources to less than significant because a monitor would be onsite to stop work and determine the proper protocol following a paleontological resource discovery during excavation or other forms of ground disturbance. On the cumulative level, impacts on paleontological resources would not be significant because impacts would largely be avoided through mitigation or because Project grading and excavation would not reach depths great enough to have a significant impact. Therefore, at the cumulative level, geologic and soil impacts from past, present, and reasonably foreseeable future projects are not cumulatively significant.

Project

The Project would have a less-than-significant impact with mitigation related to geology and soils because it would not substantially increase the risk of geologic or soil hazards, it would not involve amounts of depths of subsurface excavation that could adversely affect paleontological resources, and it would comply with existing grading requirements, the recommendations contained in the Project-specific geotechnical investigation as required by Mitigation Measure GEO-1 and the California Building Code. None of the Project's impacts on geology and soils would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the Project's incremental contribution to geology and soils impacts would not be cumulatively considerable such that a new cumulatively significant geology and soils impact would occur.

Greenhouse Gas Emissions

As discussed in Section 3.8, "Greenhouse Gas Emissions", the Project would have a less-than-significant impact on conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and a less-than-significant impact on either directly or indirectly generating GHGs emissions. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these topics. GHG emissions and the effects of climate change are cumulative global issues that accumulate in the earth's atmosphere. Therefore, study area for the greenhouse gas cumulative analysis includes the entire globe.

Past, Present, and Probable Future Projects

All of the cumulative projects, either through construction and/or operation, would contribute varying amounts of GHG emissions to the Earth's atmosphere, which when considered together, would be cumulatively significant.

Project

Construction and operation activities related to the Project would not generate emissions over the 900 $MTCO_2e$ per year CAPCOA threshold of significance. This threshold was developed based on various land use densities and

discretionary project types that were analyzed to determine the size of projects that would likely have a less than cumulatively considerable contribution to climate change. Therefore, the Project's incremental contribution to cumulative GHGs emission impacts would not be cumulatively considerable and would not exacerbate the significant cumulative GHG impact.

Hazards and Hazardous Materials

As described in Section 3.9, "Hazards and Hazardous Materials", the Project would have no impact on exposing people or structures to a significant loss, injury, or death from wildland fires. The Project would have a less-than-significant impact on the public or environment from the routine transport, use, and disposal of hazardous materials and reasonably foreseeable upset conditions involving hazardous wastes. Furthermore, the Project would have a less-than-significant impact on existing and proposed schools from potential hazardous emissions and hazardous materials and on airports from potential safety hazards. The Project would also have a less-than-significant impact on the public or the environment from being located on a hazardous materials site and on the impairment of an adopted emergency response plan or emergency evacuation plan. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these issues. Impacts related to hazardous materials and safety issues generally occur independently of one another and are related to site-specific and project-specific characteristics and conditions. Because these effects are generally localized, they typically do not combine to result in greater cumulative impacts. Therefore, the study area considered for the hazards and hazardous materials cumulative analysis includes the Project site, SDIA, and cumulative projects within a quarter mile of the Project site.

Past, Present, and Probable Future Projects

Cumulative projects could require the routine transport, use, or disposal of hazardous materials; however, none of the projects use or would use acutely hazardous materials or materials that are more hazardous than commonly used hazardous materials, such as petroleum and related products, cleaners, herbicides, and pesticides. Additionally, all sites that are on the Cortese List would require remediation and/or capping before being deemed suitable for occupancy. Existing regulations specify mandatory actions that must occur during project development and operation related to the management and land use planning associated with hazardous materials and potential safety issues related to proximity to schools and airports. Finally, cumulative projects are within 2 miles of SDIA; however, all present and future projects must comply with the existing ALUCP and coordinate with the FAA, which would avoid a cumulatively significant impact. As described above, hazardous effects are generally localized, and they typically do not combine to result in greater cumulative impacts. Therefore, at the cumulative level, hazards and hazardous materials impacts from past, present, and reasonably foreseeable future projects are not cumulatively significant.

Project

The Project would comply with all hazardous material regulations involving the transport, use, and disposal of hazardous materials. No hazardous materials sites exist on the Project site, and construction and operation of the Project would only occur on the Project site itself. None of the identified hazardous materials sites within 1,000 feet of the Project would be excavated and Project workers and guests would not enter those areas during operation. The Project received Determinations of No Hazard from the FAA and an ALUCP consistency determination from the ALUC. Therefore, because the Project would be fully compliant with existing hazardous materials regulations and the ALUCP and because there would be a very low potential to encounter on-site contamination, the Project's contributions to cumulative impacts related to hazards and hazardous materials would not be cumulatively considerable such that a new significant cumulative hazardous material impact would occur.

Hydrology and Water Quality

As described in Section 3.10, "Hydrology and Water Quality", the Project would have no impact related to increasing the rate or amount of surface runoff or risk release of pollutants due to project inundation from a flood, tsunami, or seiche. The Project would have a less-than-significant impact related to violating water quality standards; impeding the sustainable groundwater management of the basin by substantially decreasing groundwater supplies or interfering with groundwater recharge; altering drainage, which could lead to erosion; decreasing groundwater supplies, resulting in substantial on- or offsite erosion; contributing runoff water which would exceed the capacity of

existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; impeding or redirecting flood flows; and conflicting the implementation of a water quality control plan or sustainable groundwater management plan. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to water quality standards, groundwater, erosion, drainage, groundwater supplies, runoff, and water quality control plans and sustainable groundwater management plans. The study area considered for the hydrology and water quality cumulative analysis includes the Project site, other projects that share the same watershed, and projects located adjacent to the San Diego Bay.

Past, Present, and Probable Future Projects

Past projects as well as present and future projects have been and will continue to be required to prepare water quality management plans, such as SWPPPs for construction and post-construction water quality management plans, and comply with the requirements of their respective jurisdictions. San Diego Bay is a 303(d) impaired water body; however, regulations are in place to protect and enhance water quality within the bay. Although future projects could be sources of additional polluted runoff and capable of causing erosion, such plans will ensure that runoff is contained onsite or treated before being discharged into the storm drainage system and erosion is minimized using stabilizing measures. Existing regulations specify mandatory actions that must occur during project development, which would adequately address the potential for construction or operation of projects to affect water quality and potential water-related hazards. These existing regulations and requirements governing hydrology and water quality would also apply to future development in the cumulative impact area. The effects from cumulative projects would not be cumulatively significant.

Project

The Project would prepare a SWPPP during the construction phase and a SWQMP for postconstruction. These two plans would specify BMPs to ensure that the Project would not result in an adverse cumulative contribution to cumulative water quality in the area, including the San Diego Bay. The Project proponent would also be required to comply with the District's BMP Design Manual and prepare a SWQMP that accurately describes how the Project will meet source control site design and pollutant control BMP requirements in compliance with the MS4 Permit. Regulatory compliance would ensure that the Project construction does not result in substantial long-term effects on water quality. Furthermore, during operation of the Project, stormwater would be filtered through the 5,000-square-foot stormwater treatment basin constructed in the southern portion of the proposed parking lot. Stormwater would pass through approximately 20 inches of amended soil and an additional 24 inches of gravel before entering the City's stormwater system that drains into the San Diego Bay. The Project would also increase the impervious surface on the site, aiding in groundwater recharge and reducing runoff over existing conditions. Therefore, the Project's incremental contribution to cumulative impacts would not be cumulatively considerable such that a new cumulative hydrology and water quality impact would occur.

Land Use and Planning

As described in Section 3.11, Land Use and Planning, the Project would have a less-than-significant impact related to the division of an established community and potential conflict with adopted land use plans, policies, or regulations. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these two issue areas. The cumulative study area considered for the land use and planning cumulative analysis includes the Project site and projects within the Aviation Related Industrial land use designation.

Past, Present, and Probable Future Projects

Past, present, and future projects within the cumulative study area are consistent with the surrounding land and water uses (i.e., Commercial Recreation, Aviation Related Industrial). These projects either support airport-related commercial and industrial uses or assist with public access and recreation at the waterfront. Therefore, these projects are consistent with applicable plans and policies, such as the guidance provided by the PMP and the regulations associated with Chapter 3 (as appropriate) and Chapter 8 of the California Coastal Act. Furthermore, impacts involving land use plans or policies and zoning generally would not combine to result in cumulative impacts. The determination of significance for impacts related to these issues is whether a project would conflict with any applicable land use plan or policy adopted for the purpose of reducing or avoiding environmental impacts. Such a conflict is site-specific; it is

addressed on a project-by-project basis. For these reasons, the impact to land use and planning from other projects would not be cumulatively significant.

Project

All Project work would occur on the Project site and would not require construction of a linear feature, such as a roadway, that could physically divide an established community. The Project includes a PMPA to change the land use designation for the Project site from "Aviation Related Industrial" to "Commercial Recreation" to allow for visitor-serving facilities and accommodations (District 2020). Therefore, the Project would be consistent with the PMP. The Project would not conflict with the CCA, certified PMP, or the SDIA ALUCP. The Project would not conflict with any applicable land use plan, policy, or regulation, and the Project's contribution to land use and planning cumulative impacts would not be cumulatively considerable such that a new significant cumulative land use impact would occur.

Noise

As described in Section 3.13, "Noise", the Project would have a less-than-significant impact related to the increase in ambient noise levels in the vicinity of the Project; creation of excessive groundborne vibration or groundborne noise levels; and exposure of people to excessive noise in the vicinity of a private airstrip or an airport land use plan. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these three issue areas. The study area considered for the noise cumulative analysis includes the Project site, projects within a quarter mile of the Project site, and projects within a quarter mile of SDIA.

Past, Present, and Probable Future Projects

The cumulative projects all have or had construction phases that generated noise and vibration. For example, the Pacific Beach Pipeline South project is replacing 38,725 linear feet of an existing water main and 6,731 linear feet of existing sewer main less than a quarter mile from the Project site. Noise and vibration generated from the Pacific Beach Pipeline South project in combination with noise and vibration generated by the Project could cause cumulatively significant impacts. However, the cumulative projects are fairly spaced out from each other, and noise quickly dissipates over distance. Several of the cumulative projects are within the AIA for SDIA, but all projects within the AIA would be required to be consistent with the ALCUP and would not expose any noise-sensitive receptors to aircraft noise that exceeds ACLUP standards. Furthermore, the requirements of the California Building Code and Title 24 require that that interior noise levels must not exceed 45 dB CNEL by utilizing additional insulation and upgraded building materials. Cumulative projects would be required to comply these building regulations which would limit noise exposure. Therefore, because cumulative projects are far enough away from one another to avoid increased noise in the aggregate, and that projects would be required to comply with the ALCUP and the building code requirements for interior noise levels, the combined noise impacts from past, present, and future projects are not cumulatively considerable.

Project

Construction of the Project would require the use of excavators, pavers, and equipment for micro piledriving that do not generate substantial levels of ground vibration that could result in structural damage, except at relatively close distances (i.e., within 10 feet of structures). Bulldozers, which represent the most intense type of heavy-duty equipment, may also be used. Because these types of equipment would not be used within 50 feet of any nearby buildings, Project construction would not result in vibration levels that could cause structural damage. Additionally, construction activities would occur during the less sensitive daytime hours between approximately 7 a.m. and 7 p.m., Monday through Saturday (except City Holidays) to limit exposure to people residing in the area. Furthermore, the Project site is located less than a mile SDIA, and while aircraft arriving at and departing from both airports would be audible at the Project site, the noise levels from aircraft would not exceed noise compatibility standards, because the building retrofit would be completed in compliance with the requirements of the California Building Code and Title 24. Therefore, the Project's contribution to noise impacts would not be cumulatively considerable such that a new significant cumulative noise impact would occur.

Population and Housing

As described in Section 3.14, "Population and Housing", the Project would have no impact on the displacement of substantial numbers of existing people or housing. The Project would have a less-than-significant impact on substantial unplanned population growth. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to substantial unplanned population growth. The cumulative study area considered for the population and housing cumulative analysis includes the Project site and other projects within the City of San Diego.

Past, Present, and Probable Future Projects

Cumulative projects at SDIA are growth-accommodating projects because they would allow more efficient air travel to and from San Diego and would be able to process more air travelers. The hotel projects are also growth accommodating because they would allow more visitors to access the San Diego waterfront. However, these projects are not growth inducing. For instance, the additional parking generated at SDIA from the SDIA Master Plan- Parking Plaza Project would not lead more people to want to move to San Diego. Similarly, the hotel projects may encourage tourism and business travel to San Diego, but the presence of the hotel would not result in more people relocating to San Diego. Furthermore, on a cumulative basis, population and housing impacts are regulated by the City through the implementation of its General Plan. Existing policies and programs regulate growth and development that all projects within the City of San Diego would be required to comply with. Given that most of the identified cumulative projects are growth accommodating and that all projects would comply with the general plan, the impact on population and housing resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

Project

The Project would have a less than significant impact on population and housing because it would not substantially induce population growth in the area. Construction and operation of the Project would likely draw from the existing labor pool within the San Diego region and therefore, would not indirectly induce substantial population growth. Additionally, the Project does not include the development of new homes or businesses or the extension of roads or other infrastructure that would directly or indirectly induce substantial population growth. Therefore, the Project's incremental contribution to cumulative population and housing impacts would not be cumulatively considerable such that a new significant cumulative population and housing impact would occur.

Public Services

As described in Section 3.15, "Public Services", the Project would have no impacts related the construction of new or expanded schools. The Project would have a less-than-significant impact related to the construction of new or expanded fire protection, police protection, parks, and other public facilities. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to fire protection, police protection, parks, and other public facilities. The cumulative study area considered for the public services cumulative analysis includes the Project site and projects within a 0.5-mile radius of the Project site.

Past, Present, and Probable Future Projects

None of the past, present, or reasonably foreseeable cumulative projects would significantly affect public services. Fire and police protection services already provide service to the cumulative study area. The addition of the cumulative projects would not represent a substantial increase in population or the need for substantially more fire or police protection. Moreover, as the population increases in the city as a whole, the City of San Diego will be tasked with providing sufficient fire and police protection and sufficient public facilities pursuant to the City of San Diego's constitutional obligation. Similar to police and fire protection services, park services would not be significantly affected by the cumulative projects. Projects involving parking, demolition, and airport expansion would have little to no effect on parks given the nature of the projects. The hotel projects could increase demand for recreational uses, but would provide several recreational amenities to offset any cumulative impact on park facilities. Furthermore, future development projects would be site-specific and would be required, by local ordinances and State regulations, to evaluate the physical environmental impacts of constructing new or expanded public services infrastructure and to mitigate any significant impacts. Therefore, because the cumulative projects are located in an urban setting, are

currently served by public services, require little to no additional public services, and require no physical expansion of any public service facilities that would result in significant environmental impacts, impacts on public services from past, present, and reasonably foreseeable future projects are not cumulatively significant.

Project

Although the Project may result in a modest increase in fire protection, police protection, park use, and public facilities associated with guests frequenting the area, none of the proposed impacts would be considered significant when considered in connection with the general projected growth of the area and cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, no physical changes to the environment would occur, and the Project's incremental contribution to cumulative public service impacts would not be cumulatively considerable.

Recreation

As described in Section 3.16, "Recreation, the Project would have a less-than-significant impact on increasing the use of existing parks and expanding recreational facilities that could result in an adverse physical effect on the environment. The cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these two issue areas. The cumulative study area considered for the recreation cumulative analysis includes the Project site and projects within a 0.5-mile radius of the Project site.

Past, Present, and Probable Future Projects

None of the past, present, or reasonably foreseeable cumulative projects would affect recreational resources in a significant and adverse manner. The identified cumulative projects would not cause a substantial increase in population because most of the projects relate to tourism, improvements to SDIA, and general city infrastructure improvements and are not population growth inducing which could cause impacts to existing recreational facilities. Furthermore, many of the cumulative projects including the Lane Field South Project, the Navy Broadway Complex Project, and the Palm Street Observation Area Project all include the recreational features that would improve the recreational resources in the area. All future development projects would be site-specific and would be required, by local ordinances and State regulations, to evaluate the physical environmental impacts of constructing new or expanded recreation facilities, and to mitigate any significant impacts to the environment. Therefore, the impact on recreational resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

Project

The Project would not induce population growth in the region to an extent that could impact existing recreational facilities such as the District's waterfront and Balboa Park. During operation, the maximum daily guests and visitors is anticipated to be 1,000. However, the total number of visitors would not frequent the Project site at the same time, and employees, guests, and visitors would be spread out throughout the day. The Project would also not require the expansion of any recreational facilities that could result in an adverse physical effect on the environment. Moreover, the Project would not hinder access to any of the surrounding areas, but instead increase access by providing affordable accommodation options to visitors to the San Diego region. Consequently, none of the Project's impacts on recreation would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the Project's incremental contribution to cumulative recreation impacts would not be cumulatively considerable such that a new significant cumulative public services impact would occur.

Transportation

As described in Section 3.17, "Transportation", the Project would have a less-than-significant impact on conflicting with a program, plan, ordinance or policy addressing the circulation system; conflicting or being inconsistent with CEQA Guidelines section 15064.3, subdivision (b); substantially increasing hazards due to a geometric design feature or incompatible uses; resulting in inadequate emergency access; and resulting in insufficient parking supply to a decrease in public coastal access. The cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these five issue areas. The study area for the cumulative analysis includes the Project site and projects within a 0.5-mile radius of the Project.

Past, Present, and Probable Future Projects

Most of the past, present, and probable future cumulative projects that involve development would increase traffic to varying degrees. The cumulative project closest to the Project site is the Palm Street Observation Area Project, which would increase the number of pedestrians in the area during operation, which could cause a minimal increase in traffic in the area. However, given that the area is a transportation hub with multiple forms of public and alternate forms of transportation, this increase is anticipated to be minimal. Cumulative projects could cause traffic during construction; however, all development would be required to obtain a construction-related traffic control permit from the City of San Diego to address encroachment into the public right-of-way from planned construction activities. This permit would allow the City to control blocked roadways and traffic caused from cumulative projects. Cumulative projects that include roadway improvements on District land would be required to comply with the District's design and safety standards. Projects within District jurisdiction would also be subject to the District's review process which would ensure that that the project design would comply with all applicable industry roadway/driveway design standards. Given the existing construction regulations and the variety of public and alternate forms of transportation available in the area, the impact on traffic from past, present, and reasonably foreseeable future projects is not cumulatively significant.

Project

The Project would likely increase the demand for transit in the area, primarily on the light rail trolley system (i.e., MTS San Diego Trolley). However, the Green Line Trolley has sufficient capacity to accommodate the additional riders anticipated to be generated by the Project. Project construction activities would not result in long-term increases in vehicular trips because the construction would be temporary and intermittent in nature. Operation of the Project would promote the use of alternate forms of transportation proactively through an interactive kiosk and a STAY OPEN smart phone application that would inform guests and visitors about available public transportation and shared transportation services in the area and passively given its proximity to the Green Line Trolley. Continuous sidewalks are present in the vicinity of the Project site; thus, providing direct pedestrian access between the Project site and the Middletown Trolley Station without any barriers. All on-site roadway improvements associated with the Project, such as a rebuilt driveway, would be constructed in accordance with District design and safety standards. Additionally, the Project is subject to the District's review process which would ensure that that the Project design would comply with all applicable industry roadway/driveway design standards. The Project would not result in an insufficient parking supply that could limit public coastal access. As discussed above in Section 3.17(d), the Project is required to provide a minimum of 74 parking spaces. The Project would provide 85 spaces and would therefore exceed the Tidelands Parking Guidelines. The Project would also not require the construction, re-design, or alteration of any public roadways that could interfere with emergency access and would be required to obtain a traffic control permit during construction. For these reasons, the Project's incremental contribution to cumulative transportation impacts would not be cumulatively considerable such that a new significant transportation impact would occur.

Utilities and Service Systems

As described in Section 3.19, "Utilities and Service Systems, the Project would have a less-than-significant impact on the environment from the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities; water supplies available to serve the project and reasonably foreseeable future development; the wastewater treatment provider that serves the Project; the attainment of solid waste reduction goals through the generation of solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure; and federal, state, and local management and reduction statutes and regulations related to solid waste. The cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these five issue areas. The study area considered for the utilities and service systems cumulative analysis includes the utility service areas for the PLWTP for wastewater treatment, the City of San Diego's Public Utilities Department for water conveyance and supply, and the City of San Diego's landfills for solid waste, and SDG&E for electricity and gas.

Past, Present, and Probable Future Projects

Cumulative projects involving restaurants, hotels, and other visitor-serving uses would result in a greater demand on utilities and service systems over existing conditions. Cumulative projects would be required to comply with soil waste

regulations including applicable elements of the Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 239 to 282), the Toxic Substances Control Act (15 U.S.C. Section 2601 et seq.), the California Department of Toxic Substances Control's hazardous waste regulations (CCR, Title 22, Division 4.5), and the Integrated Waste Management Act. Furthermore, new development would be required to comply with the California Building Code which includes measures to increase energy efficiency and reduce water use. However, even with compliance with solid waste regulations and current energy efficiency and water reduction requirements, the introduction of new uses would increase the demand for water, wastewater, solid waste, and energy. Therefore, the impacts on utilities from past, present, and probable future projects is considered cumulatively significant.

Project

The Project would use the existing utility connections on the site, and operation of the hotel would not generate a utility demand that would require relocation of existing utilities or construction of additional utilities. Furthermore, the Project's projected annual potable water demand, projected wastewater generation, and projected solid waste generation is within the capacity of the existing utility infrastructure and would be compliant with the City's Construction and Demolition Debris Ordinance. Furthermore, the Project would comply with solid waste regulations including applicable elements of the Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 239 to 282), the Toxic Substances Control Act (15 U.S.C. Section 2601 et seq.), the California Department of Toxic Substances Control's hazardous waste regulations (CCR, Title 22, Division 4.5), and the Integrated Waste Management Act. Consequently, none of the Project's impacts on utilities would be considered significant when considered in connection with cumulative impacts from past, present, and probable future projects. Therefore, the Project's incremental contribution to utilities and service systems would not be cumulatively considerable and would not exacerbate the existing significant cumulative utilities impact.

Wildfire

The Project would have no impact on exposing people or structures to flooding or landslides or exacerbating fire risk from the installation of associated infrastructure. The Project would have a less-than-significant impact on potentially impairing an adopted emergency response plan or emergency evacuation plan and exposing Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to emergency response plans and pollutant concentrations from a wildfire. The cumulative study area considered for the wildfire cumulative analysis includes the Project site and cumulative projects within 0.5 mile of the Project site.

Past, Present, and Probable Future Projects

The past, present, or reasonably foreseeable cumulative projects are all located in a highly developed portion of the City of San Diego surrounded by airport-related commercial and industrial land uses along with recreational and tourism land uses associated with the District's lands. No wildland areas are within the vicinity of the identified cumulative projects, and the City of San Diego classifies the area as non-Very High FHSZ (City of San Diego 2009, CalFire 2020b). The potential for exacerbated wildfire risks from the implementation of cumulative projects would be minimal.

All projects requiring road closures for construction would be required to obtain the necessary construction-related traffic control permit from the City of San Diego to address encroachment into the public right-of-way from planned construction activities. Project applicants would be required to notify and coordinate with all affected agencies, including the police department and fire department which would prevent conflicts with the EOP or other local emergency response plans. Therefore, the impact on wildfire from past, present, and reasonably foreseeable future projects is not cumulatively significant.

Project

The Project is 0.25 mile from local responsibility areas designated as Very High FHSZ in portions of Midtown and Park West. However, given that a major interstate highway, I-5, along with various developed land separate the Project site from these high fire hazard zones, the potential for exacerbated wildfire risks from construction or operation of the Project is minimal. In addition, the Project would comply with the traffic control permit stipulations would maintain

access and connectivity during construction, and the Project would not substantially impair evacuation or emergency response plans outlined in the EOP or other local emergency response plans. Once construction is complete, the Project would operate similar to its pre-construction condition, and no permanent changes to public rights-of-way would occur that could substantially impair implementation of the EOP or other adopted emergency response plans. Therefore, the Project's incremental contribution to cumulative recreation impacts would not be cumulatively considerable such that a new significant cumulative wildfire impact would occur.

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

Less-than-significant impact with mitigation incorporated. As analyzed in Section 3.1, through Section 3.20, with the exception of Section 3.7, "Geology and Soils", the Project would not result in potentially significant impacts that could cause substantial adverse effects on human beings, either directly or indirectly. As discussed in Section 3.7, "Geology and Soils", potential risks to human beings related to geology and soils would be less than significant with implementation of mitigation measure GEO-1. Impacts from air quality, greenhouse gas emissions, noise, hazards and hazardous materials, and water quality and hydrology would all be less than significant and would not cause a substantial adverse effect on humans. Potential risks to human beings related to geology and soils would also not occur because mitigation measure GEO-1 would reduce impacts to **less-than-significant** levels.

REQUIRED MITIGATION MEASURES

The following mitigation measures would reduce the potentially significant impacts from the Project.

BIO-1: Avoid Direct Loss and Disturbance of Nesting Protected Birds

- For Project construction activities, including tree or vegetation removal, that begin between February 1 and September 15, a qualified biologist shall conduct preconstruction surveys to identify active bird nests on and within 50 feet of the Project site. The surveys shall be conducted no more than 14 days before construction commences. If no active nests are found during focused surveys, no further action under this measure shall be required.
- If nests are identified during the preconstruction surveys, impacts to nesting birds shall be avoided by establishing appropriate buffers around active nest sites identified during preconstruction surveys. Buffer distances shall be established by a qualified biologist using available protocols published by State or federal agencies with jurisdiction over the observed species, or if no protocols are available, then based on the professional judgment and discretion of the qualified biologist. Project activity shall not commence within the buffer areas until a qualified biologist has determined that the young have fledged, the nest is no longer active, or reducing the buffer would not likely result in nest abandonment. A qualified biologist shall establish a non-disturbance buffer at a distance sufficient to minimize nest disturbance based on the nest location, topography, cover, the species' sensitivity to disturbance, and the intensity/type of potential disturbance. The size of the buffer may be adjusted if a qualified biologist determines that such an adjustment would not be likely to adversely affect the nest. Monitoring of the nest by a qualified biologist during and after construction activities shall be required if the activity has potential to adversely affect the nest. If construction activities cause the nesting bird to vocalize, make defensive flights at intruders, get up from a brooding position, or fly off the nest, then the no-disturbance buffer shall be increased until the agitated behavior ceases. The exclusionary buffer shall remain in place until the chicks have fledged or as otherwise determined appropriate by a qualified biologist.

CUL-1: Unanticipated Discoveries of Archaeological Resources

Before initiation of ground disturbance, the project applicant shall design and implement a Worker Awareness Training Pamphlet that shall be provided to all construction personnel and supervisors who will have the potential to encounter cultural resources. The pamphlet shall describe, at a minimum:

- types of cultural resources expected in the project area;

- types of evidence that indicate cultural resources might be present (e.g., trash scatters; historic-era bottles);
- what to do if a worker encounters a possible resource;
- what to do if a worker encounters bones or possible bones; and
- penalties for removing or intentionally disturbing cultural resources, such as those identified in the Archeological Resources Protection Act.

In the event that a historic-period archaeological site (such as concentrated deposits of bottles or bricks, amethyst glass, or other historic refuse), is uncovered during grading or other construction activities, all ground-disturbing activity within 50 feet of the discovery shall be halted until a qualified archaeologist can assess the significance of the find. The District will be notified of the potential find and a qualified archaeologist shall be retained to investigate its significance. Any previously undiscovered resources found during construction will be recorded on appropriate California Department of Parks and Recreation 523 forms and evaluated for significance under all applicable CRHR regulatory criteria. If the archaeologist determines that the find does not meet the CRHR standards of significance for cultural resources, construction may proceed. If the find is determined to be significant by the qualified archaeologist (i.e., because the find is determined to constitute either an historical resource or a unique archaeological resource), avoidance of the resource is the preferred treatment. If avoidance of the significant resource is not possible, the archaeologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. If necessary, the data recovery plan will include a research design that will be developed, based on the type and nature of the significant resource, to answer scientific questions about our past that is in the public interest. The data recovery plan will also be performed in compliance with the Secretary of the Interior's Standards and Guidelines for Archaeology. If artifacts are recovered from significant historic archaeological resources, they shall be housed at a qualified curation facility. The results of the identification, evaluation, and/or data recovery program for any unanticipated discoveries shall be presented in a professional-quality report that details all methods and findings, evaluates the nature and significance of the resources, and analyzes and interprets the results.

GEO-1: Compliance with Recommendations of the Geotechnical Study

Seismic Considerations

- A Site Class D is recommended for the site in accordance with the 2019 California Building Code.
- During a design earthquake, liquefaction induced settlement may occur in the western portion of the building extending to near the center of the building. Liquefaction induced settlements are estimated to be 1-inch or less.
- Differential settlement due to liquefaction across 40 feet could be on the order of ½ inch within the building.

Earthwork

- Removal/replacement of existing undocumented soils is recommended for new foundations.
- New footings along the eastern building wall may be extended into competent, natural formational material.
- Excavations and shoring systems should meet the minimum requirements given in the most current State of California Occupational Safety and Health Standards.
- Subgrade soils should be scarified to a depth of 8 inches, moisture-conditioned, and compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557.
- Fill soils should be placed in horizontal lifts, moisture-conditioned, and mechanically compacted to at least 90 percent of the maximum dry density in accordance with ASTM D 1557.
- Fills consisting of the on-site or imported sandy soils should be placed at a moisture content over the optimum moisture content.
- Moisture should be maintained in fill prior to placing new fill or at the subgrade surfaces or additional processing may be required.

- Imported fill material should be predominately granular and non-expansive.
- The on-site inert demolition debris when crushed to the consistency of aggregate base may be reused in the compacted fills provided approval is provided by the reviewing regulatory agency and the owner.
- A representative of the Geotechnical Engineer should observe excavations, subgrade preparation, and fill placement activities.
- Sufficient in-place field density tests should be performed during fill placement and in-place compaction to evaluate the overall compaction of the soils.
- Soils that do not meet minimum compaction requirements should be reworked and tested prior to placement of any additional fill.

Pile Foundations

- Piles will be required to support the building either for the foundations supporting the roof deck extension and if the retrofit of the existing foundations as part of the building renovation indicate that additional axial support is required at selected columns except along the east wall.
- The pile foundations will mitigate against the potentially liquefiable soils at the site.
- Additional piles, if required, are recommended to be extended into the dense to very dense sandstone.
- Foundation contractor should be prepared for a range of drilling conditions, including shallow groundwater and caving soils.
- A representative of the Geotechnical Engineer should continuously observe the installation of the piles at the site.
- The final pile design for additional piles to retrofit the existing foundations should be reviewed by the Geotechnical Engineer.

Shallow Foundations

- Minor structures not attached to the existing building such as site walls, small retaining walls, and trash enclosures with relatively light structural loads may be supported on shallow footings.
- Continuous footings or isolated column footings for structures should be supported on engineered fill or competent formational material.
- Soil resistance to lateral loads may use a combination of frictional resistance between the bottom of footings and underlying soils or aggregate base material and by passive soil pressures acting against the embedded sides of the footings without a reduction.
- A representative of the Geotechnical Engineer should observe and approve all footing excavations prior to placement of concrete and steel.
- Foundation concrete should conform to the requirements for negligible sulfate exposure for soil (Category S0) as outlined in ACI 318, Section 4.3.

Floor Slabs

- Repairs to the existing slab-on-grade floors, if required, should be supported on properly compacted, sandy non-expansive soils.
- A structurally reinforced floor slab will be required if the risk of liquefaction settlement to cause distress to the existing slab-on-grade floor in the center and eastern portion of the building is not acceptable.
- A moisture vapor retarder should be placed under slabs that are to be covered with moisture-sensitive floor coverings (wood, vinyl, tile, etc.).

Retaining Walls

- Non-expansive, imported or on-site, granular soils is recommended to be used as wall backfill.

- Active earth pressures can be used for designing walls that can yield at least 1 inch laterally in 10 feet of wall height under the imposed loads.
- At-rest pressures should be used for restrained walls that remain rigid enough to be essentially non-yielding.
- An additional lateral earth pressure should be added to the above active pressures for walls greater than 6 feet high to account for seismic loads.
- Walls subject to surcharge loads should be designed for an additional uniform lateral pressure based on the anticipated surcharge pressure.
- Wall backfill should be well-drained to relieve possible hydrostatic pressure or designed to withstand these pressures.

Storm Water Infiltration and Drainage

- Surface infiltration of storm water is not recommended at the site since the soils above the hard silts and clays consist of existing fills and potentially liquefiable soils.
- Positive surface gradients should be provided adjacent to structures so as to direct surface water run-off and roof drainage away from foundations and slabs
- Long-term ponding of surface water should not be allowed on pavements or adjacent to buildings.

Flatwork and Pavements

- Exterior concrete and masonry flatwork should be supported on non-expansive, compacted fill.
- The use of the clayey soils within 2 feet of the flatwork subgrade should not be permitted unless differential heave is tolerable.
- Modifications of the parking lot may be consist of a pavement section of asphalt concrete over of aggregate base or portland cement concrete (PCC) over compacted subgrade.
- Aggregate base should conform to the requirements of California Department of Transportation Standard Specifications or the Standard Specifications for Public Works Construction (Green Book) for untreated base materials.
- The design of paved areas should incorporate measures to prevent moisture build-up within the base course which can otherwise lead to premature pavement failure.

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