ADDENDUM TO THE REVISED
FINAL ENVIRONMENTAL IMPACT REPORT

Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment

(State Clearinghouse #2006021027)

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

DECEMBER 2020

Addendum to the Revised Final Environmental Impact Report for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (State Clearinghouse #2006021027)

Sunroad Harbor Island East Hotel Project

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LIST OF ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
AGL	above ground level
ALUC	Airport Land Use Commission
ALUCP	airport land use compatibility plan
AMSL	above mean sea level
BMP	best management practice
BPC	Board of Port Commissioners
CAAQS	California Ambient Air Quality Standards
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CPT	cone penetration test
CY	cubic yards
dBA	A-weighted decibels
ESA	Phase I Environmental Site Assessment
FAA	Federal Aviation Administration
GHG	greenhouse gases
GSF	gross square feet
K	Kelvin
KOP	Key Observation Point
LED	light-emitting diode
L_{eq}	equivalent noise level
LOS	level of service
MCEo	maximum considered earthquake geometric mean
MHPA	Multiple Habitat Planning Area

MW	moment magnitude
NAAQS	National Ambient Air Quality Standards
NOVA	NOVA Services, Inc.
OES	County of San Diego Office of Emergency Services
PMP	Port Master Plan
RAQS	Regional Air Quality Strategy
ROG	reactive organic gas
SDAPCD	Diego Air Pollution Control District
SDIA	San Diego International Airport
SF	square feet
SIP	State Implementation Plan
STC	sound transmission class
SWPPP	storm water pollution prevention plan
USGS	U.S. Geological Survey
UST	underground storage tank

1 INTRODUCTION

1.1 BACKGROUND AND ACTION TRIGGERING THE ADDENDUM

This addendum to the Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027) ("2014 certified EIR") evaluates differences between the proposed development of a 450-room hotel on approximately 7.55 acres on East Harbor Island ("proposed project") against the hotel development and PMP Amendment evaluated in the certified 2014 Revised Final EIR (Revised FEIR) for changes that may require additional analysis under CEQA.

The proposed project would result in 50 fewer hotel rooms at the project site, compared to the approved 500 rooms included in the San Diego Unified Port District's (District's) East Harbor Island Subarea Port Master Plan (PMP) Amendment component analyzed in the certified 2014 Revised FEIR.

As the lead agency under the California Environmental Quality Act (CEQA), the District has prepared this addendum to the 2014 Revised FEIR. This addendum is organized as an environmental checklist and documents that the proposed project would not meet the conditions outlined in State CEQA Guidelines 15162 and 15163 requiring the preparation of a subsequent EIR or supplemental EIR, and would meet the conditions in State CEQA Guidelines Section 15164, which provide for CEQA compliance through the approval of an addendum to a previously certified environmental document.

A description of the 2014 Revised FEIR is provided in Section 1.2, "Previous Environmental Analyses," and project background is provided in Section 2.1, "Project Background and Need."

1.2 PREVIOUS ENVIRONMENTAL ANALYSES

The certified 2014 Revised FEIR consists of the following documents that are relevant to consideration of the proposed project:

- DEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment, Volume 1 (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027), December 2009.
- Recirculated Portions of DEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027), November 2010.
- Revisions to the DEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-635; State Clearinghouse #2006021027), July 2013.
- Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027), November 2013.
- Errata to Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027), February 2014.

In December 2009, the Port District prepared a DEIR for a PMP amendment that included construction of a Sunroad hotel to replace the existing marina locker building with a 175-room, four-story, limited service hotel on a site currently leased to Sunroad Marina Partners, LP and located east of the hotel site evaluated in this document. In 2011, a lawsuit was filed which claimed the Final EIR was inadequate with respect to analyzing the potential impacts of the development of multiple hotels. In 2013, revisions to the DEIR were released for public review and analyzed an amendment to the PMP that would allow buildout of a total of 500 hotel rooms in the East Harbor Island Subarea, On March 4, 2014, the Port passed Resolution 2014-52 to certify the Revised FEIR and Resolution 2014-53 to approve the proposed PMP amendment. The PMP amendment was denied by the Coastal Commission and the proposed 175-room hotel was not constructed.

1.3 REQUIREMENTS FOR CALIFORNIA ENVIRONMENTAL QUALITY ACT REVIEW AFTER AN ENVIRONMENTAL IMPACT REPORT HAS BEEN CERTIFIED

Altered conditions, changes, or additions to the description of a project that occur after certification of an EIR may require additional analysis under CEQA. The legal principles that guide decisions regarding whether additional environmental documentation is required are provided in the State CEQA Guidelines, which establish three mechanisms to address these changes: 1) a subsequent environmental impact report (Subsequent EIR), 2) a Supplement to an EIR, or 3) an Addendum to an EIR.

Section 15162 of the State CEQA Guidelines describes the conditions under which a SEIR shall be prepared. In summary, when an EIR has been certified for a project, no Subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

> (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
>
> (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete, shows any of the following:
>
> > (A) The project will have one or more significant effects not discussed in the previous EIR;
> >
> > (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
> >
> > (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or
> >
> > (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15163 of the State CEQA Guidelines states that a lead agency may choose to prepare a supplement to an EIR rather than a Subsequent EIR if:

> (1) any of the conditions described above for Section 15162 would require the preparation of a Subsequent EIR; and
>
> (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

An addendum is appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed, or the circumstances surrounding the project have changed, but none of the changes or revisions would result in significant new or substantially more severe environmental impacts, consistent with Public Resources Code (PRC) Section 21166 and State CEQA Guidelines Sections 15162, 15163, and 15164.

Based on the criteria above, the District has determined that an addendum is the appropriate CEQA document for the proposed project. This addendum is intended to evaluate and confirm CEQA compliance for the proposed project, which would be a change relative to what is described and evaluated in the certified 2014 Revised FEIR. This addendum is organized as an environmental checklist and is intended to evaluate all environmental topic areas for any changes in circumstances or the project description, as compared to the approved hotel development and PMP

Amendment, and determine whether such changes were or were not adequately covered in the certified 2014 Revised FEIR. This checklist is not a traditional CEQA Environmental Checklist per Appendix G of the State CEQA Guidelines. Rather, the purpose of this checklist is to evaluate the checklist categories in terms of any "changed condition" (i.e., changed circumstances, project changes, or new information of substantial importance) that may result in a different environmental impact significance conclusion from the certified 2014 Revised FEIR. The column titles of the checklist have been modified from the Appendix G presentation to help answer the questions to be addressed pursuant to CEQA Section 21166 and State CEQA Guidelines Section 15162, 15163, and 15164.

A comprehensive update to the CEQA Guidelines has been completed since certification of the certified 2014 Revised FEIR. The checklist categories follow the updated Appendix G of the CEQA Guidelines, which became effective on December 28, 2018.

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2 PROJECT DESCRIPTION

Sunroad HIE Hotel Partners, L.P., as the project proponent, is proposing a hotel development on approximately 7.55 acres (328,878 square feet). The Sunroad Harbor Island East Hotel Project (project) would include construction and operation of the following:

- An up to 15-story, dual branded hotel with approximately 450 total rooms consisting of an extended stay hotel with 200 rooms (118,000 gross square feet [GSF]) and a limited service hotel with 250 rooms (123,000 GSF) in a single building;
- Meeting rooms and ballrooms totaling 10,000 GSF, shared amenities including a fitness center and restrooms for hotel guests totaling 3,000 GSF, and retail shops totaling 350 GSF;
- A walk-up restaurant and bar area open to the public totaling 3,500 GSF;
- A public promenade, public access pedestrian pathways, and mini destinations for public use; and
- Approximately 350 on-site surface parking spaces, including 14 spaces designated exclusively for public use.

These and other components of construction and operation of the project are described in more detail in this chapter. This chapter's contents also include the project background and need, project location, compatibility with the Port Master Plan, and potential permits and approvals required for the project.

The conceptual project was presented to the Board of Port Commissioners (BPC) at their October 8, 2019, meeting. At that time the BPC directed District staff to further study the project and commence the necessary review under the California Environmental Quality Act (CEQA).

2.1 PROJECT BACKGROUND AND NEED

The San Diego Unified Port District's (District) Strategic Plan establishes the goal of providing a "vibrant waterfront destination where residents and visitors converge." Currently, Harbor Island has several marinas that harbor thousands of small boats, two high-rise hotels and several restaurants. Visitors to the island can enjoy land and water recreation in waterfront parks and can visit a variety of restaurants and hotels. The eastern portion of Harbor Island offers close proximity to San Diego International Airport (SDIA) and coastal views of marinas, the San Diego Bay, Downtown San Diego and Coronado; however, the East Basin of Harbor Island is currently developed with a variety of industrial uses and parking lots that have primarily served the SDIA in the past.

As part of its efforts to enhance Harbor Island as a destination, in 2016 the BPC selected Sunroad to redevelop the northeast corner of Harbor Island Drive and East Harbor Island Drive adjacent to the existing Sunroad Resort Marina. This site currently contains a 740-space parking lot that has provided temporary parking areas for a variety of District tenants. These parking areas have been allowed under a District Temporary Use and Occupancy Permit that allows for the interim parking use and can be cancelled with 30 days' notice. The existing site is currently not seen as a destination in and of itself, as visitors currently pass by it on their way to other locations on Harbor Island. As a result, the project site, in its current state, does not address the Strategic Plan's goal of establishing a "vibrant waterfront destination" on Harbor Island, and more can be done to create a vibrant waterfront destination.

The District's certified Port Master Plan (PMP) anticipates the site be developed with "a high quality hotel of approximately 500 rooms that is sited to be responsive to views of San Diego Bay, the airport, and the downtown San Diego skyline. Maximum building heights establish consistency with aircraft approach paths. The hotel complex includes restaurant, cocktail lounge, meeting and conference space, recreational facilities, including piers, and ancillary uses" and is listed on the appealable project list as a: "HOTEL COMPLEX: up to 500 rooms, restaurant, cocktail lounge, meeting and conference space; parking; landscape." (PMP, pages 53 and 57).

The purpose of the proposed project is to (1) develop the site as a high quality hotel destination as envisioned in the PMP, (2) further activate the Harbor Island waterfront by providing additional overnight accommodations for visitors to Harbor Island, downtown San Diego and the numerous waterfront amenities in the area, (3) provide additional accommodations for a wide range of visitors (the proposed project would include an extended stay and limited service hotel) to ensure visitors would have a variety of options on the waterfront, and (4) create an activating new promenade that would connect to other destinations on Harbor Island while providing pedestrian-level, visitor-serving amenities. By fulfilling each of these purposes, the project would encourage visitors to see the project site as a destination, rather than as an area to pass by.

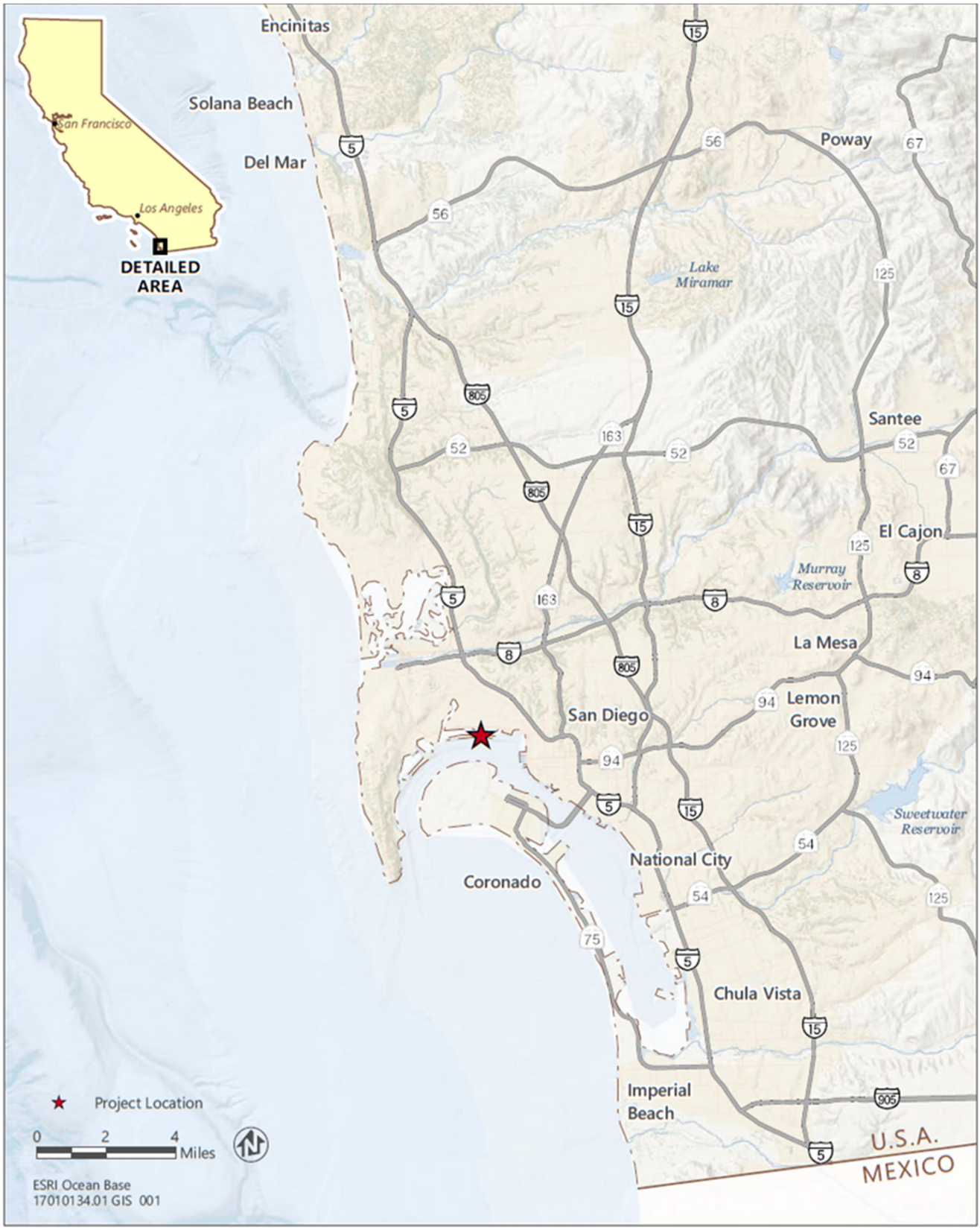
Sunroad and the District have worked together over the past four years to complete this vision of the site as a portion of the gateway to San Diego. The BPC has provided significant guidance on its vision for the parcel, requiring that the hotel be designed to be a world-class destination for visitors to stay while enhancing public access and creating a sense of place worthy of the prime location on Harbor Island.

2.2 PROJECT LOCATION

The project site is located on Harbor Island East, at the northeast corner of Harbor Island Drive and East Harbor Island Drive in the City of San Diego in San Diego County. The project site is located within Planning District 2 (Harbor Island/Lindbergh Field) of the certified PMP (San Diego Unified Port District 2017). Harbor Island is a man-made, artificial peninsula consisting of dredged sand deposits. Existing landside uses on Harbor Island generally consist of hotels, restaurants, public parks, and marine-related services. Water-related uses in the area are predominantly related to recreational boating and include slip rentals, boat rentals, charters, lessons, sailing clubs, and other visitor-serving uses. The regional location and project location are illustrated on Figure 2-1 (Regional Location) and Figure 2-2 (Project Location), respectively. The existing conditions of the project site are shown in Figure 2-3 (Existing Conditions).

The project site consists of two parcels totaling approximately 7.55 acres (328,878 square feet [SF]): one parcel is approximately 6.43 acres (280,091 SF), is currently paved with asphalt and used for parking, and is designated as Commercial Recreation; the other parcel is approximately 1.12 acres (48,787 SF) and has limited landscaping and designated as Open Space (see Figure 2.1, Existing Conditions). The existing paved parcel includes 740 parking spaces that has provided temporary interim parking lot uses for a variety of District tenants. These parking areas have primarily been allowed under a District Temporary Use and Occupancy Permit that can be cancelled with 30 days' notice. The entire project site is located landside and does not include any waterside components. The project has a site elevation of 13 feet above mean sea level (AMSL). The Sunroad Marina borders the project site to the east, with approximately 550 slips and a single-story building that houses the Marina's administrative offices and several commercial businesses. The former Lockheed Martin Marine Terminal Facilities site and open water in the East Basin form the northern boundary of the project site. Harbor Island Drive forms the western and southern boundary of the project site. The Sheraton San Diego Hotel and Marina is located across the four-lane section of Harbor Island Drive to the west. North San Diego Bay is located across the four-lane section of East Harbor Island Drive to the south.

The project site is located approximately 0.2 mile from SDIA. Major circulation facilities in the area include North Harbor Drive, Rosecrans Street, Nimitz Boulevard, Interstate 5, and Interstate 8.



Source: adapted by Ascent Environmental in 2020.

Figure 2-1 Regional Location

Source: adapted by Ascent Environmental in 2020.

Figure 2-2 Project Location

Source: adapted by Ascent Environmental in 2020

Figure 2-3 Existing Conditions

2.3 PROJECT COMPONENTS

This section includes a detailed description of the components of the proposed project: the proposed hotel building; public access and pedestrian circulation; site access and parking; lighting and signage; landscaping and water quality design features; the proposed lease agreement; project construction; and project operation. The proposed site plan is shown on Figure 2-4.

2.3.1 Proposed Hotel Building

The project would construct a dual-branded hotel complex with up to 450 rooms, including an extended stay hotel and a limited service hotel within a single building. The extended stay wing would consist of 12 floors and include 200 rooms. Common areas such as a lobby, registration pods, and breakfast lounge would be provided on the ground floor (Figure 2-5) and the rooms would be distributed across levels 2 through 12 (Figure 2-6). The extended stay wing would have a building footprint of 9,500 square feet and total floor area of 118,000 GSF.

The limited service wing would consist of 15 floors and include approximately 250 rooms. Common areas such as a lobby, registration desk, lounge and bar, and breakfast seating area would be provided on the ground floor (Figure 2-7) and the rooms would be distributed across levels 2 through 15 (Figures 2-5 and 2-6). The total floor area is 123,000 GSF.

In addition to the dual brand hotel the ground floor of the proposed building would include meeting rooms and ballrooms totaling 10,000 GSF and shared amenities including a fitness center and restrooms for hotel guests totaling 3,000 GSF. Retail shops totaling approximately 350 GSF also would be provided. The ground floor would also include other areas necessary for hotel operations such as space for administrative functions, laundry, and operational equipment. The project would have a total building footprint of 34,000 square feet (SF) and the maximum building gross square footage of the project would be 265,000 GSF.

Outside of the proposed hotel building the project would provide an outdoor swimming pool with jacuzzi spa and outdoor private function space for hotel guests and approximately 3,500 GSF of walk-up restaurant or bar area open to the public.

The maximum height of the building would be approximately 160 feet from finished grade to the top of the building parapet (excluding the elevator overrun and mechanical enclosures). The maximum height including the elevator overrun and mechanical enclosures would be 175 to 180 feet. The maximum height approved by the Federal Aviation Administration (FAA) and San Diego County Airport Land Use Commission (ALUC) is up to 224 feet above ground level (AGL) or 237 feet AMSL to accommodate the building flagpole.

BUILDING MATERIALS AND DESIGN

The two hotel brands would be identified by their own specific orientation, height, and materials. Building materials for the south and north elevations are shown on Figure 2-8; the west and east elevations are shown on Figure 2-9. Along the south elevation with a full height low E glass recess, the two building volumes representing each hotel brand come together. Further complementing the overall composition, a horizontal band combining glass within an aluminum composite metal panel frame connects the distinct building masses and turns down to connect with a metal canopy at ground level. The building massing expresses a combination of floor-to-floor openings consisting of low E glass in a slight blue tint and solid Exterior Insulation and Finish System panels. The project will comply with all aspects of Cal Green Building Standards Code, as applicable.

As a bird-friendly strategy, the project includes an overall façade that limits continuous glass surfaces by alternating between glass and solid panels in an approximately 50% to 50% ratio. Approximately 96% of the glass surfaces are envisioned in a low E blueish gray tinted glass with a visible light exterior reflectance value of 25%.

A shimmering effect mimicking ocean sun reflections is proposed for the remaining glass surfaces through the use of angled glazed panels with a 32% visible exterior light reflectance and with a warmer color coating. The shimmering accent glass would be directed away from SDIA and would comprise only 2% of the overall façade, and the EFIS and accent glass are intermittently placed to avoid large expanses of glass.

The ground level would be highly transparent with the use of a low E storefront glazing system at the entry and through most of the ground level. The pre-function space would host a folding door system that would allow a more visual connection between the indoor space and the outdoor space.

2.3.2 Public Pedestrian Access and Circulation

The project would incorporate public use areas and amenities accessible to the public year-round, including the aforementioned walk-up restaurant and bar area. Public access and pedestrian circulation features would include a public promenade, pedestrian pathways through the project site, improvements to the Open Space parcel including landscaping, signage, mini destinations, and an on-site delineated pedestrian pathway (Figure 2-10).

A new 15-foot wide public promenade would be constructed along the length of the project site waterfront along the East Basin. The public promenade would be paved and marked with signage designating public access and provide seating open to the public in three areas. The proposed project would also include three "Bay to Street" pedestrian pathways to provide public access through the project site from Harbor Island Drive to the waterfront along the East Basin. These pathways would be paved with a minimum width of five feet and marked with informational and public access signage. The pathways would be located along the northwestern and eastern edges of the project site, and in the center of the project site between the western parking lot and outdoor swimming pool and through the Open Space parcel.

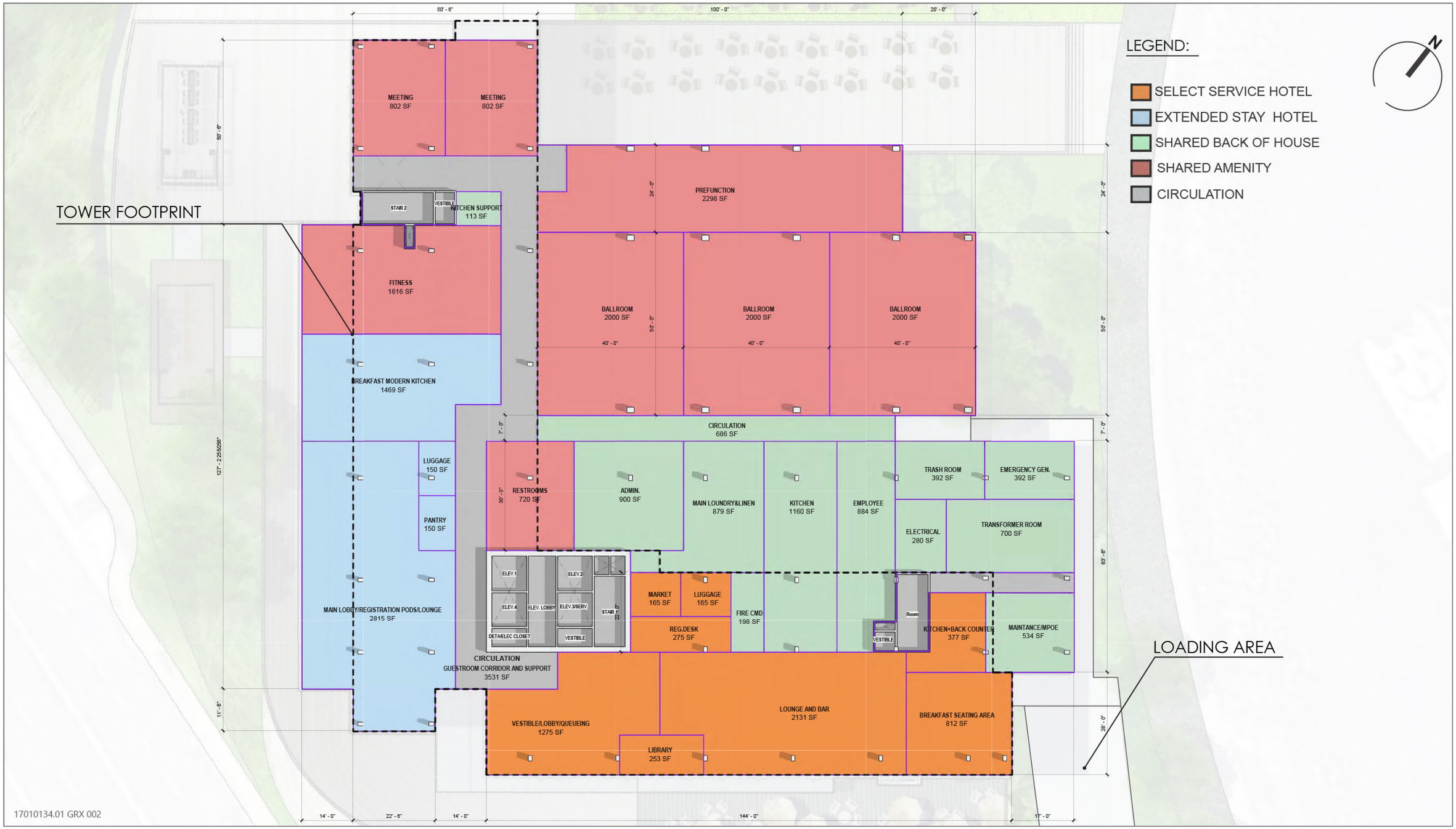
The project would include four "mini destinations" available at all times for public use, three of which are proposed along the East Basin public promenade where it connects to the public access pedestrian pathways (Figure 2-10). Another would be located on the existing Open Space parcel located at the southwest corner of the project site. These destinations would consist of features such as bench seating, educational signage or artwork. A delineated pedestrian pathway would provide direct access among the public promenade, walk-up restaurant and bar areas, permanent mini destinations, and connecting pathway intersecting points. The existing public sidewalk adjacent to the project site along Harbor Island Drive is proposed to remain in place but could be repaired or replaced during construction.

OPEN SPACE PARCEL

The project would improve the Open Space parcel to include passive open space area. Proposed landscaping on the Open Space parcel would consist of trees, chaparral sage scrub mix, coastal sage scrub mix, and turf. The Open Space parcel would be available to the public as well as access for hotel guests.

Source: Image provided by Sunroad Enterprises in 2019

Figure 2-4 Proposed Site Plan

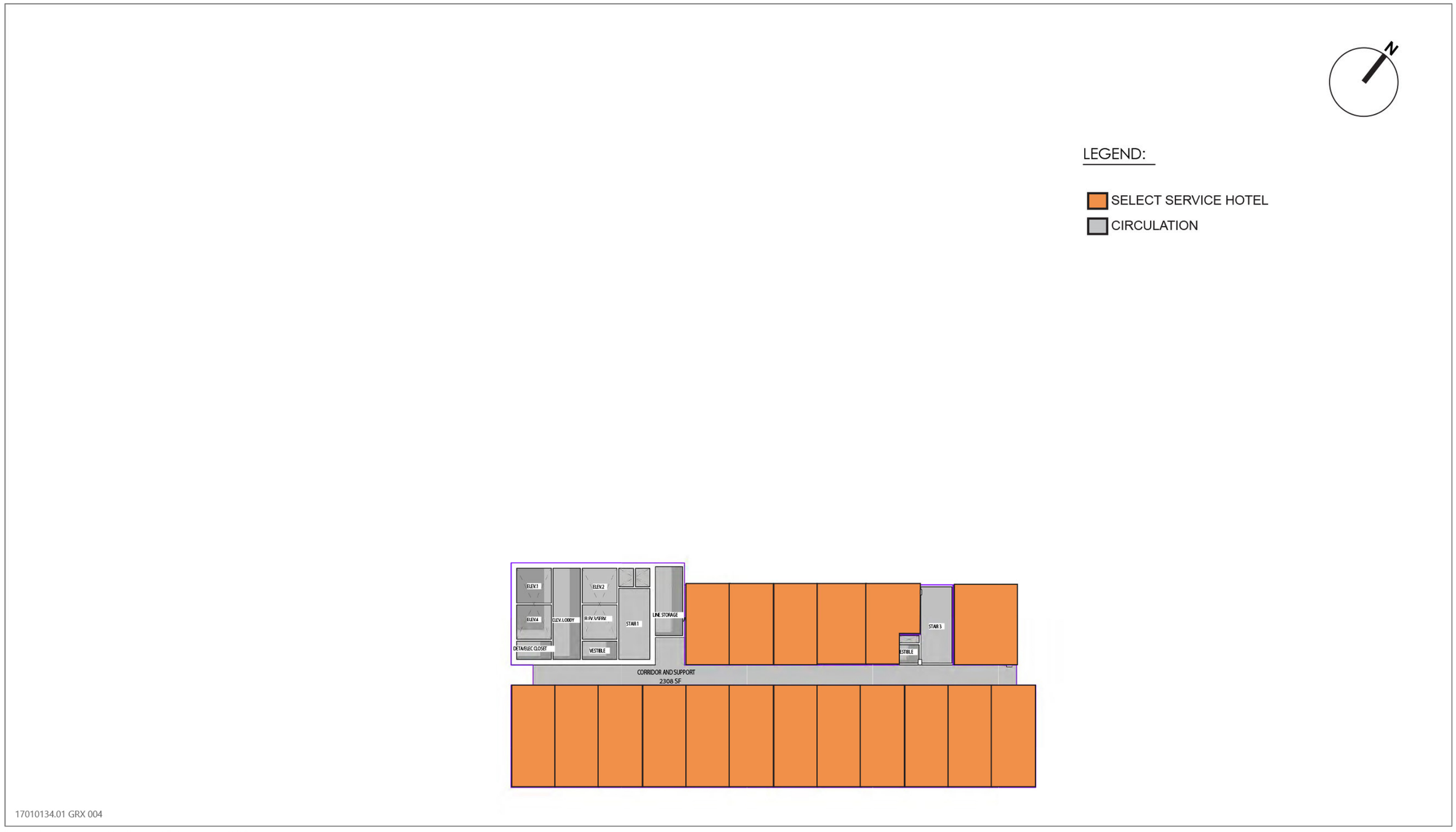


Source: Image provided by Sunroad Enterprises in 2019

Figure 2-5 Ground Level Floor Plan

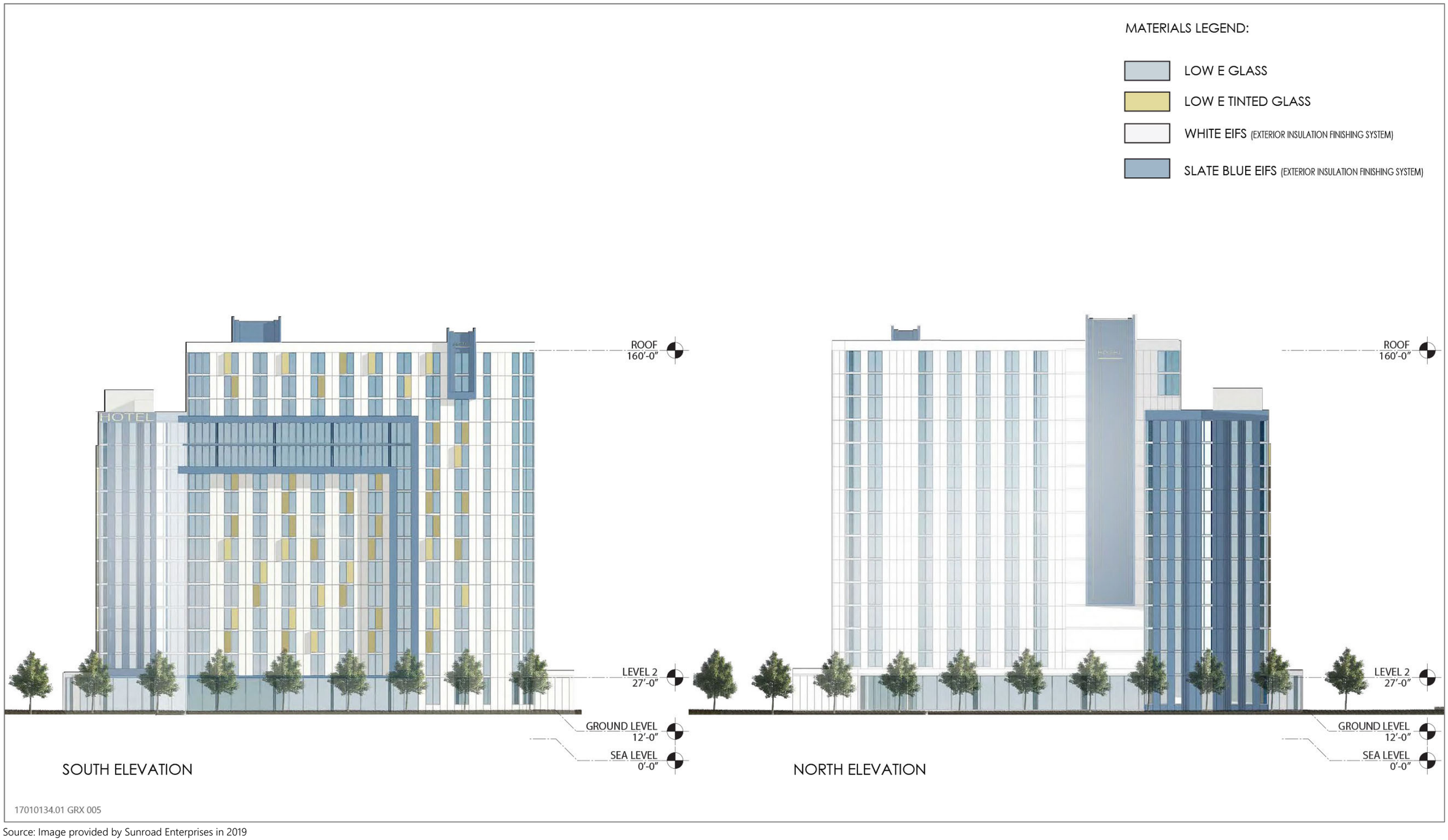
Source: Image provided by Sunroad Enterprises in 2019

Figure 2-6 Levels 2-12 Floor Plan



Source: Image provided by Sunroad Enterprises in 2019

Figure 2-7 Levels 13-15 Floor Plan

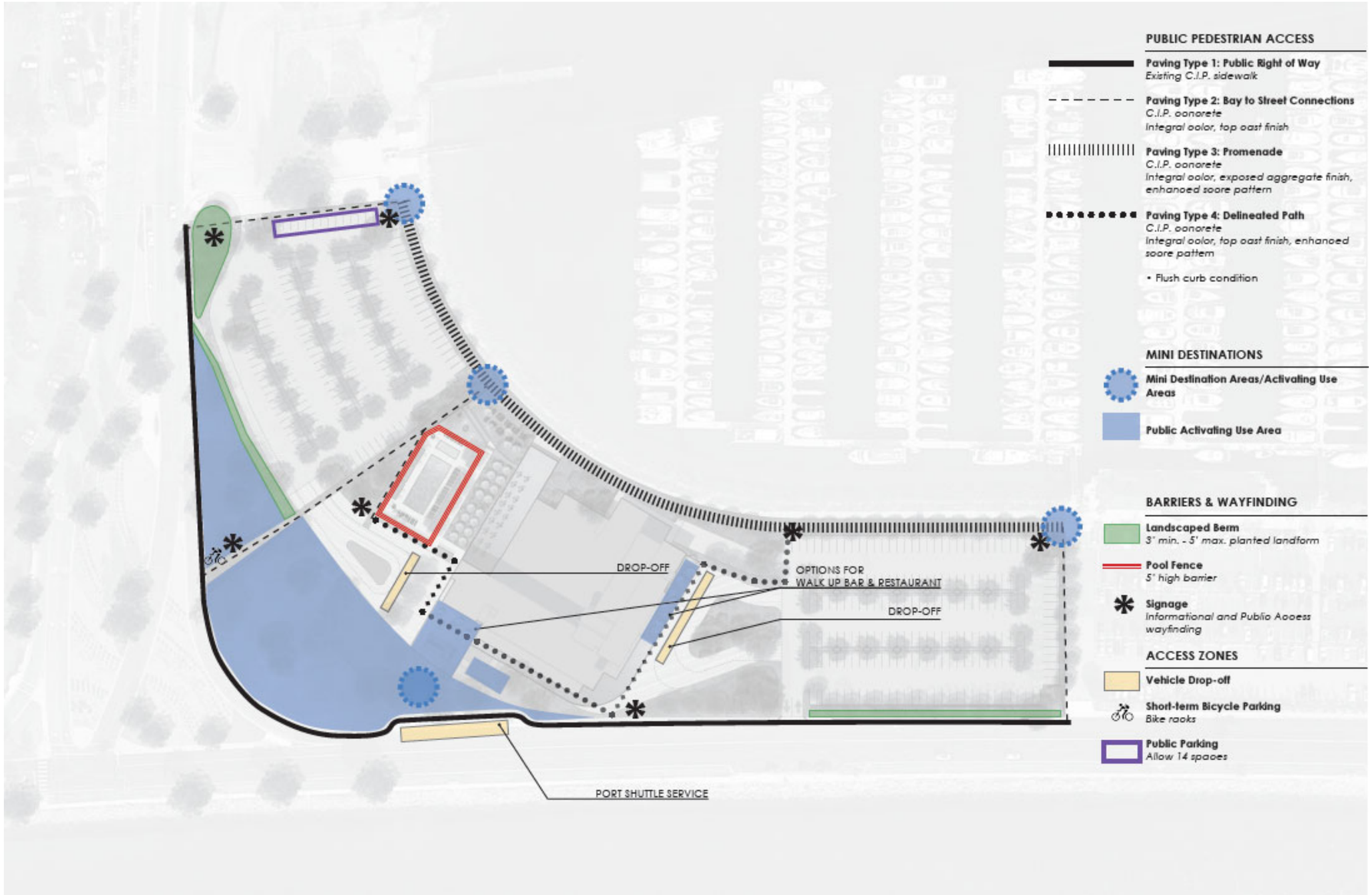


Source: Image provided by Sunroad Enterprises in 2019

Figure 2-8 South and North Building Elevations

Source: Image provided by Sunroad Enterprises in 2019

Figure 2-9 West and East Building Elevations



Source: Image provided by Sunroad Enterprises in 2021

Figure 2-10 Public Pedestrian Access

2.3.3 Access and Parking

Vehicular access to the project site would occur at two locations from Harbor Island Drive: on the northwestern and southern ends of the project site (Figure 2-4). Ride share drop off and pick up areas would be located at each of the hotel entrances. The Porte Cochere and circle drives would accommodate buses for turning radius and height clearances. Service entrances and related facilities would be located at the easternmost end of the building and buffered from view by proposed trees and shrubs.

The project would provide 350 parking spaces within two surface parking areas located on the eastern and western sides of the proposed hotel building. The eastern and western parking lots would total 114,000 SF of surface area. Landscaped berms ranging from approximately three to five feet tall would be located between each parking lot and Harbor Island Drive. The berm along the western parking lot would be approximately 250 feet long while the berm along the eastern parking lot would be approximately 290 feet long. Of the 350 total parking spaces, 14 would be designated for public parking, 10 would be Americans with Disabilities Act (ADA) compliant, and 2 would be ADA van-accessible spaces. All hotel, restaurant and retail employees parking will be accommodated onsite.

The eastern parking lot is located at the front main entrance to the hotel with access from Harbor Island Drive. The primary features of the eastern lot are:

- direct connection to the hotel's Porte cochere entrance;
- primary hotel guest parking lot, with any overflow accommodated in the western lot; and
- vehicle drop off area located adjacent to the lot at hotel entrance.

The primary features of the western lot are:

- parking for special events and meetings,
- drop off area at the rear entrance to the hotel with direct access to meeting rooms and ballroom areas,
- public parking (14 stalls reserved for public use at western parking entrance),
- overflow hotel guest parking, and
- vehicle drop off area located adjacent to the lot at hotel entrance.

This site currently contains a 740-space parking lot that has provided temporary parking areas for a variety of District tenants. These parking areas have been allowed under a District Temporary Use and Occupancy Permit that allows for the interim parking use and can be cancelled with 30 days' notice.

The existing bus turnout southerly of the project site along Harbor Island Drive would remain at its current location. The District Shuttle Service would use the existing bus turnout to provide service to the proposed project site. This service typically operates during summer months from approximately Memorial Day to Labor Day. Sunroad HIE Hotel Partners, L.P. would financially participate in the District Shuttle Service on a fair share basis.

The project also would provide an airport shuttle to transport hotel guests to and from SDIA. A bicycle rack would be provided on the project site for public use.

2.3.4 Lighting and Signage

Proposed project lighting would be consistent with Lighting Zone standards adopted by the Illuminating Engineering Society and International Dark Sky Association and the City of San Diego outdoor lighting ordinance (Ordinance Number 20186) that requires outdoor light fixtures to limit light pollution through the use of drop cast configuration, shielding, or flat lenses. The project design includes LZ2 Moderate ambient lighting where lighting is typically used for safety and activity but is not necessarily uniform or continuous. In addition, lighting levels may be extinguished or reduced as activity levels decline. Light-emitting diode (LED) lighting would be used throughout the project site. The proposed LED lighting would not exceed 3000 Kelvin (K).

Each hotel brand is proposed to have two building signs that will comply with the District's Tenant Signage Guidelines. The project would have a total of four LED marquis building signs, backlit with additional side shields to minimize light spill. The extended stay hotel brand is proposed to have a vertical sign approximately 20 feet by 5 feet in size on the south façade mounted to the concrete circulation core. A horizontal sign approximately 3 feet by 20 feet in size would be located on the top south east corner at the parapet. The limited service hotel brand would have one sign on the west façade approximately 12.5 feet by 12.5 feet in size that would cover the top of the circulation core. A second sign on the east façade would be approximately 7.5 feet by 7.5 feet in size.

2.3.5 Landscaping and Water Quality Design Features

All proposed landscaping would be drought-tolerant and non-invasive pursuant to State of California, California Native Plant Society, and California Invasive Plant Council, except for turf proposed on the Hotel site and the Open Space parcel (Figure 2-11). Proposed landscaping also would be 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 provide the following categories of landscaping materials:

- a combination of trees, Chaparral Sage Scrub hydroseed mix, Coastal Sage Scrub hydroseed mix, and turf on the Open Space parcel;
- screen hedges to provide visual screening along the northwestern and eastern limits of the project site consisting of tree and shrub species;
- berm plantings of trees and shrub understory to create a visual screen between the two proposed parking lots and the Harbor Island Drive and East Harbor Island Drive;
- trees and shrub understory within each of the proposed parking lots; and
- ornamental gardens at several locations around the exterior of the proposed hotel building.

The project would result in approximately 206,000 SF of impervious surface area, including the building footprint of the proposed hotel, the main entry ways and drop off locations, surface parking areas, and the pedestrian promenade, Bay to Street pathways, the delineated pathway, and other general hardscape areas. With respect to permanent water quality design features, the proposed project would include biofiltration vaults to remove pollutants from onsite drainage flows and would label drainage inlets to discourage dumping.

2.3.6 Project Construction

Construction of the project is expected to begin in mid- to late-2021 and be completed by mid- to late 2023 for a total duration of approximately 24 months. Construction activities would occur 8 hours per day, 5 days a week. Construction activities would be limited to 7 a.m. to 7 p.m. Monday through Friday, except for legal holidays (with the exception of 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 five stages: demolition; site preparation; grading; building construction; and paving. No pile driving or blasting would occur. Table 2-1 provides a summary of project construction, including estimates for equipment to be used, duration, and the average number of construction workers on-site per day during each stage.

* Section at Parking Lot Berm

OPEN SPACE / TURF

TREES
Cercis occidentails
Chilopsis linearis
Pinus torreyana

CHAPARRAL SAGE SCRUB MIX
Acmispon glaber
Artemisia californica
Encelia farinosa
Eriogonum fasciculatum
Eschscholzia californica
Festuca microstachys
Hesperoyucca whipplei
Lasthenia californica
Lupinus bicolor
Mimulas aurantiacus
Phacelia ciliata
Salvia apiana
Salvia mellifera
Stipa pulchra
Trifolium willdenovii

HYDROSEED MIX 75%
12"-36" Height Range

COASTAL SAGE SCRUB MIX
Acmispon glaber
Acmispon americanus
Artemisia californica
Camissoniopsis cheiranthifolia
Collinsia heterophylla
Encelia californica
Eriogonum fasciculatum
Eriophyllum confertiflorum
Eschscholzia californica
Festuca microstachys
Isocoma menziesii
Lasthenia californica
Lupinus succulentus
Mimulus aurantiacus puniceus
Salvia apiana
Salvia mellifera
Sisyrinchium bellum
Stipa pulchra

HYDROSEED MIX 25%
12"-54" Height Range

Turf

PLANTING LEGEND

SCREEN HEDGE
Dodonaea viscosa 'Purpurea'
Pittosporum tenuifolium
'Margorie Channon'

BERM PLANTING
TREE
Acca sellowiana
Lagerstroemia indica
'Glendora White' Multi

SHRUB UNDERSTORY
Agave americana
Miscanthus sinensis
Rosmarinus officinalis
'Tuscan Blue'

PARKING LOT PLANTING
TREE
Acacia stenophylla
Arbutus unedo

SHRUB UNDERSTORY
Arctostaphylos 'Emerald Carpet'
Astelia banskii
Lomandra longifolia 'Breeze'
Leymus condensatus
'Canyon Prince'
Westringia fruticosa 'Gray Box'

ORNAMENTAL GARDEN
TREE
Arctostaphylos manzanita
'Dr. Hurd'
Olea europaea 'Fruitless'

SHRUB UNDERSTORY
Agave attenuata
Agave 'Blue Flame'
Agave 'Blue Glow'
Agave parryi
Arctostaphylos 'Pacific Mist'
Chorizema 'Bush Flame'
Calandrinia spectabilis
Dianella 'Little Rev'
Hesperaloe parvifolia
Limonium perezii
Salvia spathacea
Senecio serpens
Sesleria autumnalis

17010134.01 GRX 008

Source: Image provided by Sunroad Enterprises in 2020

Figure 2-11 Landscape Plan

Table 2-1 Project Construction Summary

Construction Stage	Equipment (amount)	Duration (months)	Construction Workers (average per day)
Demolition	Concrete/Industrial Saw (1) Excavators (3) Rubber Tired Dozers (2)	1	15
Site Preparation	Rubber Tired Dozers (3) Tractors/Loaders/Backhoes (4)	1.5	15
Grading	Excavators (2) Graders (1) Rubber Tired Dozers (1) Scrapers (2) Tractors/Loaders/Backhoes (2)	2	15
Building Construction (exterior and interior)	Cranes (1) Forklifts (3) Generator Sets (1) Tractors/Loaders/Backhoes (3)	19 (1)	100
Paving	Pavers (2) Paving Equipment (2) Rollers (2)	6 (1)	20
Architectural Coatings	Compressors (2) Crane (1)	11	6
Total		**24**	**200** (2)

Notes:
1. The Building Construction and Paving stages would overlap for a period of approximately six months.
2. Architectural Coatings stage would overlap with Building Construction stage for a period of approximately ten months and with Paving stage for a period of approximately six months.
3. During the peak of construction activity there could be up to 200 workers at the project site.

The numbers of construction employees would vary during the various stages of construction. At the peak of construction there could be as many as 200 employees on site. This would occur during the Building Construction stage. The daily vehicle truck trips would also vary greatly during construction. Peak construction would generate up to 250 daily vehicle truck trips. Employees would travel to the site from throughout the San Diego area.

Construction of the project would involve use of several different types of equipment: tractors, backhoes, loaders, excavators, rubber tired dozers, scrapers, generators, pavers, rollers, graders, compactors, air compressors, cranes, forklifts, haul trucks, and other miscellaneous types of small equipment.

The existing project site includes 37 light poles with 300 watt LED area lights (Type III. 24,200 Lumens, 5000 K), which would be removed as part of project construction. Approximately 54 trees on-site would be removed from the project site, including various palm species (washingtonia and invasive), magnolia, and ficus. Certain of these trees are in boxes and are property of the District. These trees vary in size and age.

The existing pavement on site will be ground on site and used as base material. Therefore, no export of existing pavement is anticipated.

A tower crane would be required to construct the exterior of the proposed hotel building, and an exterior manlift would be utilized to transport workers and materials into and out of the building until the permanent elevators can be installed and used for this purpose. The maximum height for the tower crane approved by the FAA and ALUC is up to 276 feet AGL or 289 feet AMSL. The crane would be marked/lighted in accordance with FAA Advisory circular 70/7460-1 L Change 2, Obstruction Marking and Lighting, flags/red lights – Chapters 3 (Marked), 4, 5 (Red), and 12.

During construction, cut and fill would be balanced on-site with 30,000 cubic yards (CY) of cut and 30,000 CY of fill, including remedial work. According to the Geotechnical Investigation Report by NOVA dated February 10, 2020, the top two feet of soil would need to be removed and recompacted (these are included in the cut and fill quantities provided above) (Appendix D). Deep soil mixing is proposed to harden the ground beneath the proposed hotel building in order to effectively eliminate liquefaction risk and allow development of the proposed hotel on shallow foundations. Deep soil mixing involves drilling and refilling holes with a soil-cement mixture. Spoils generated from foundations and utilities would be stockpiled onsite and disposed of at the nearest available permitted fill site at the time of export. The project is expected to generate an estimated 5,250 CY of spoils and debris to be exported off-site. A soils testing group will be engaged to provide preliminary tests and will provide on-site observation during operations. The project is anticipated to generate construction debris that would be subject to the landfill diversion requirements of the City of San Diego Construction and Demolition Debris Deposit Ordinance. The appropriate City of San Diego Waste Diversion paperwork will be completed for the project.

Minimal stockpiling would be required as there are no underground structures. Best management practices will be used on site including measures such as hydraulic mulch, gravel berm bags, storm drain inlet protection, street sweeping, hydroseeding, silt fence, sand bad barrier, and others as required consistent with applicable permits and regulations to maintain spoils until they are removed from the site. The stockpile area, delivery and laydown area, and all construction activities would occur within the boundaries of the project site. Silt fence would be installed along the perimeter of the project site prior to the start of demolition and retained for the duration of construction. Debris would be contained in dumpsters located on-site. The anticipated haul route for spoils and construction debris disposal would be I-8, utilizing Rosecrans Street, Nimitz Boulevard and North Harbor Drive to the site on Harbor Island Drive. Figure 2-12, Construction Limits, shows the boundaries of the Project site and any off-site construction disturbance such as utility improvements.

Prior to construction activities, the project proponent would obtain the necessary construction-related traffic control permit from the City of San Diego to address encroachment into the public right-of-way as a result of planned construction activities. The traffic control permit would ensure that public access through Harbor Island Drive and East Harbor Island Drive and to the surrounding businesses would be maintained at all times during construction, in a safe and efficient manner. 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 requires the development of a storm water pollution prevention plan (SWPPP) by a certified Qualified SWPPP Developer.

Source: adapted by Ascent Environmental in 2020

Figure 2-12 Construction Limits

2.3.7 Project Operation

The project would operate as dual branded hotel complex with up to 450 rooms, including a select service hotel and an extended stay hotel presented in one building. It would incorporate public use areas and public activation amenities accessible to the public year-round, including an accessible waterfront with retail components. Pedestrian access to the public would be provided from a public promenade along the East Basin as well as the pedestrian access on Harbor Island Drive. The public promenade would also provide open seating. The hotel would include a fitness center open to hotel guests.

The project is anticipated to accommodate receptions, banquets and conferences utilizing the ballrooms and meeting room space provided, albeit on a small scale. The meeting space totals approximately 10,000 square feet, a relatively small capacity, and less than 10% the space allocated in a typical hotel which caters to special events. For example, the Sheraton Harbor Island has approximately 116,000 square feet of special event space. Depending on the type of event (reception, banquet or conference), the special events in the ballrooms would typically range from 150 to 250 persons. The meeting rooms could typically accommodate between 20 and 90 persons. Events would be held typically on weekends, the average over the year is approximately 25 persons per day.

During operation, based on the operation of existing equivalent hotel operations, the project operator anticipates the hotel would have to have on average 700 hotel guests per day, including special event visitors. In addition, the proposed project is anticipated to have on average 26 public visitors per day. The project would result in the employment of approximately 122 total jobs (full time equivalent individuals), including maintenance staff, hotel management, facilities, and cleaning crews. Up to 100 employees would be present on-site per day.

OPERATING EQUIPMENT

The project would include operating equipment for the project components. The hotel tower and associated functional rooms, amenities, meeting rooms, and ballrooms would be served by a Variable Refrigerant Flow system for HVAC including rooftop condensers and a rooftop hot water boiler. These pieces of equipment would be architecturally screened from view. An emergency generator and transformer would be installed on grade and visually screened from view. The building interior would include fire sprinklers.

UTILITIES

The project would include the following utility infrastructure connections and improvements:

- Water – An existing 16" water line in Harbor Island Drive west and south of the property would provide water service to the project. The connection to Harbor Island Drive to the south is the most feasible connection point. Please see Figure 2-11, Construction Limits, for anticipated connection points.
- Wastewater – An existing 15" sewer line in Harbor Drive south of the property would provide sewer service to the Project. In addition, there are two 12" VCP sewer lines directly servicing the property from the 15" VCP Sewer Line. One or both lines would provide service to the project.
- Stormwater – An existing 30" storm drain along the northerly boundary of the property would receive stormwater most of the site. In addition, there is an existing 18" RCP storm drain along the easterly boundary that may provide an additional outfall for stormwater flow. Site drainage would be by overland flow and onsite storm drain systems to the two existing storm drains. No additional outfalls to the harbor are proposed as part of the project.
- Electric, Telephone, and Cable – Electric, telephone, and cable lines run along Harbor Island Drive at the property frontage, and through the west corner of the Open Space parcel. In addition, two electric lines transect the site along the northern portion, and one transects the Open Space parcel. The existing lines would serve the project.
- Gas – A gas line runs along Harbor Island Drive at the property frontage, and through the west corner of the Open Space parcel. This existing line would serve the project.

All on-site utilities would be installed underground with the exception of transformer boxes and cabinet facilities.

2.4 COMPATIBILITY WITH THE PORT MASTER PLAN

The District has a certified PMP that provides official planning policies, consistent with a general statewide purpose, for the physical development of the tide and submerged lands conveyed and granted in trust to the San Diego Unified Port District (2017). The District's PMP governs the lands that the State Legislature has conveyed to the District, as trustee or that the District later acquired. The California Coastal Commission certified the original PMP on January 21, 1981. This action resulted in the District having authority to issue coastal development permits for development within the coastal zone that are consistent with the certified PMP.

The project is located within East Harbor Island (Subarea 23) of Planning District 2 (Harbor Island/Lindbergh Field) of the certified PMP. As described above, the PMP anticipates that East Harbor Island will include future development of, "a high quality hotel of approximately 500 rooms, (that) is sited to be responsive to views of San Diego Bay, the airport, and the downtown San Diego skyline." The future hotel development also will include, "restaurant, cocktail lounge, meeting and conference space, recreational facilities, and ancillary uses." It further states that the maximum height of the future hotel will, "establish consistency with aircraft approach paths." (San Diego Unified Port District 2017:53).

Existing landside uses on Harbor Island generally consist of hotels, restaurants, public parks, and marine-related services. Water-related uses in the area are predominantly related to recreational boating and include slip rentals, boat rentals, charters, lessons, sailing clubs, and other visitor-serving uses.

The existing certified PMP allows development of 500-room hotel on the westernmost parcel of East Harbor Island (Area #3), which is the project site. The specific land use designations for the project site are Commercial Recreation, which includes hotels and restaurants, and Open Space, which includes landscaped traffic inter-change and median strips, and isolated narrow and irregular shoreline areas where use and development potential is severely limited and where publicly placed works of art can enhance and enliven the waterfront setting. Public access within open space setback areas is limited to passive recreation uses. The project does not include any water uses or in-water components. The project's proposed uses as described herein are compatible with the existing land use designations and the proposed project does not require a PMP Amendment.

The project evaluated in the 2014 Revised FEIR proposed an amendment to the PMP to (1) address the proposed changes in land use resulting from reconfiguring East Harbor Island Drive and the traffic circle at its eastern terminus, and (2) provide for the 500-room hotel building allowed on the westernmost parcel of East Harbor Island (Area #3) to be developed as up to three hotels on two or three parcels (Area #1, and Areas #2 and/or #3) of the East Harbor Island Subarea, with a combined maximum of not more than 500 rooms. A proposed 175-room hotel project (Area #1) would have constituted a portion of the 500 total hotel rooms allowed on East Harbor Island.

Although the project evaluated in the 2014 Revised FEIR generally included uses consistent with the existing certified PMP, the PMP would have needed to be amended to allow the reconfiguration of East Harbor Island Drive and the traffic circle at its eastern terminus, and the development of up to three hotels on two or three parcels on East Harbor Island. The parcels on East Harbor Island where the up to three hotels could have occurred, already had the proper land use designation for hotel use—Commercial Recreation.

2.5 POTENTIAL PERMITS AND APPROVALS REQUIRED

The District is the primary approval authority for the project. District authorizations would include:

- Approval of an addendum to the Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027) ("2014 certified EIR").
- Issuance of an appealable Coastal Development Permit (CDP) in compliance with the Coastal Act. All regulatory requirements identified in this document would be incorporated as standard conditions of the CDP.
- Approval of the plans and specifications, as well as concept approval for the proposed project.
- Approval of new lease agreements between the District and Sunroad HIE Hotel Partners, L.P.

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

- Federal Aviation Administration notification and approval;
- 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); and
- City of San Diego issuance of ministerial permits (e.g., grading, building, electrical).

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3 ENVIRONMENTAL CHECKLIST FOR SUPPLEMENTAL ENVIRONMENTAL REVIEW

3.1 EXPLANATION OF CHECKLIST EVALUATION CATEGORIES

The purpose of this checklist is to evaluate whether any of the conditions identified in CEQA Section 21166 or CEQA Guidelines Section 15162 and requiring the preparation of a supplemental or subsequent EIR would occur with respect to the proposed project as compared to the certified 2014 Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027). The row titles of the checklist include the full range of environmental topics, as presented in the current version of Appendix G of the State CEQA Guidelines, as updated December 28, 2018, and as applicable to the analysis presented in the 2014 Revised FEIR. The column titles of the checklist have been modified from the format presented in Appendix G to incorporate the criteria of CEQA Section 21166 and State CEQA Guidelines Section 15162 addressing when a subsequent EIR, supplement to an EIR, or an addendum to an EIR shall be prepared. A "no" answer indicates that the proposed project presents no change in the condition or status of an impact previously analyzed and adequately addressed with mitigation measures in the certified 2014 Revised FEIR. For instance, an environmental topic might be answered with a "no" in the checklist because the impact associated with the proposed project was adequately addressed in the certified 2014 Revised FEIR, and the environmental impact significance conclusions of the certified EIR remain applicable for the proposed project. The purpose of each column of the checklist is further described below.

3.1.1 Any Project Changes or New Circumstances Involving New or Substantially More Severe Significant Impacts?

Pursuant to Sections 15162(a)(1) and 15162(a)(2) of the CEQA Guidelines, this column indicates whether there have been substantial changes proposed to the approved project or changes in the circumstances under which the project is undertaken that have occurred subsequent to certification of the 2014 Revised FEIR, which would result in the proposed project having new significant environmental impacts that were not identified in the prior environmental document or would result in substantial increases in the severity of previously identified significant impacts.

3.1.2 Any New Information of Substantial Importance?

Pursuant to Section 15162(a)(3)(A-D) of the CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available, requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigation measures remain valid. New information is considered to be of "substantial importance" if it shows that one or more of the following would result: (A) the project will have one or more new significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If there is new information of substantial importance, the question would be answered 'Yes' and require preparation of a subsequent EIR or supplement to the EIR. However, if the additional analysis completed as part of this Environmental Checklist Review finds that the conclusions of the prior environmental document remain the same and no new significant impacts are identified, or identified significant environmental impacts are not found to be substantially more severe, the question would be answered 'No' and no supplement to the EIR or subsequent EIR would be required.

3.2 DISCUSSION AND MITIGATION SECTIONS

3.2.1 Discussion

Chapter 4 includes separate discussions for each of the environmental topics considered in the Checklist. Each discussion begins with an overview of what was discussed and concluded in the 2014 Revised FEIR, and identifies what, if any, impacts were concluded for that topic, followed by a summary of the changes in the project and changes in circumstances or new information of substantial importance as it relates to that topic. These details are then the focus of the rest of the environmental analysis, in accordance with State CEQA Guidelines Section 15162(a). The summary comparison of the proposed project to the project evaluated in the 2014 Revised FEIR provided in Table 3-1 was used to inform preparation of the environmental checklist.

Table 3-1 Summary Comparison of Proposed Project to 2014 Revised FEIR

Topic	Project Evaluated in 2014 Revised FEIR	Proposed Project	Change (2014 Revised FEIR vs. Proposed Project)
Project Components			
Project site	Includes three areas: ▶ Marina locker building, surface parking, portion of Harbor Island Drive (immediately east of Sunroad Resort Marina) (Area #1). ▶ Surface parking lot (immediately west of Sunroad Resort Marina) (Area #2). ▶ Westernmost site on East Harbor Island: Surface parking lot for overflow rental cars and undeveloped open space parcel (Area #3).	Westernmost site on East Harbor Island (Area #3): Surface parking lot and undeveloped open space parcel. 740-space paved parking lot providing temporary parking areas for a variety of District tenants. Parking allowed under District Temporary Use and Occupancy Permit that allows for the interim parking use and can be cancelled with 30 days' notice.	Proposed project includes westernmost site on East Harbor Island (Area #3). The current project site is one of the potential locations for a hotel evaluated in the 2014 Revised FEIR (Area #3). Other areas (#1 and #2) not included in proposed project.
Land Use	175-room hotel and ancillary uses on Area #1; PMP Amendment to allow 325 hotel rooms on Areas #2 and/or #3. Public promenade along the East Basin (north of Area #1). EIR assumes the 325 rooms could be in one 10-story structure or two approximately 4-story structures. Refer to PMP Consistency summary in the following row for additional discussion of the PMP Amendment required for the project evaluated in the 2014 Revised FEIR.	Hotel development with up to 450 rooms on a 6.43-acre parcel and 1.12 acres of open space (Area #3). Hotel development ancillary uses include meeting rooms and ballrooms (10,000 gross square feet [GSF]); shared amenities including a fitness center and restrooms for hotel guests (3,000 GSF); walk-up restaurant or bar outside the hotel building (3,500 GSF); retail shops (350 GSF); and surface parking facilities. The project proposes a public promenade along the East Basin (north of Area #3). The site would also include landscaped passive open space.	The proposed project includes the same land use types (hotel and ancillary uses; public promenade; passive open space) as the project evaluated in the 2014 Revised FEIR. However, the proposed project would not require a PMP Amendment (refer to the following row for discussion of the proposed project's PMP consistency).
PMP Consistency	The existing certified PMP allows for one hotel with up to 500 rooms and ancillary facilities on one site in the westernmost portion of the East	The existing certified PMP anticipates that East Harbor Island will include future development of, "a high quality	No PMP amendment required for proposed project.

Topic	Project Evaluated in 2014 Revised FEIR	Proposed Project	Change (2014 Revised FEIR vs. Proposed Project)
	Harbor Island Subarea (Area #3). The ancillary or supporting facilities identified in the certified PMP included restaurant, cocktail lounge, meeting and conference space, recreational facilities, including piers, and ancillary uses. The proposed PMP Amendment would allow up to three hotels in up to two locations (Areas #2 and #3) in the East Harbor Island Subarea with a combined maximum of not more than 500 rooms. The PMP Amendment also listed additional supporting facilities for a hotel, including swimming pools, spas, and commercial retail. The PMP Amendment also provides for reconfiguration of a portion of East Harbor Island Drive and the traffic circle at its eastern terminus, as well as a variety of public access improvements including an extended public promenade along the waterfront (north of Area #1).	hotel of approximately 500 rooms, (that) is sited to be responsive to views of San Diego Bay, the airport, and the downtown San Diego skyline." The future hotel development also will include, "restaurant, cocktail lounge, meeting and conference space, recreational facilities, and ancillary uses." It further states that the maximum height of the future hotel will, "establish consistency with aircraft approach paths." (San Diego Unified Port District 2017:53). The specific land use designations for the project site (Area #3) are Commercial Recreation, which includes hotels and restaurants, and Open Space, which includes landscaped traffic inter-change and median strips, and isolated narrow and irregular shoreline areas where use and development potential is severely limited and where publicly placed works of art can enhance and enliven the waterfront setting. Public access within open space setback areas is limited to passive recreation uses. The project's proposed uses are compatible with the existing land use designations and do not require any land use designation changes. The project does not include any water uses or in-water components. No PMP amendment required.	
Proposed Hotel Development	175-room hotel with fitness and limited meeting space (approximately 8,000 square feet) and common areas on Area #1; PMP Amendment to allow 325 hotel rooms on Areas #2 and/or #3. Public promenade along the East Basin (north of Area #1). Proportionate to the type and extent of future hotel development, activating uses such as restaurants, outdoor seating and dining areas, and retail shops open to the public would be integrated into the development of each hotel. All future hotel development allowed by the proposed PMP Amendment (Areas #2 and/or #3) would include construction of a public promenade within the proposed leasehold of either hotel along Harbor Island East Basin frontage (Areas #2 and/or #3). The PMP Amendment also listed additional supporting facilities for a hotel, including swimming pools, spas, and commercial retail. EIR assumes the	Maximum 450 hotel rooms (extended stay hotel with 200 rooms and limited service hotel with 250 rooms in a single building); 3,500 gross square feet (GSF) for a restaurant and bar; 10,000 GSF for meeting rooms and ballrooms; 3,000 GSF for shared amenities (i.e., fitness center and restrooms); and 350 GSF of retail space (Area #3).	The proposed project includes 50 fewer total hotel rooms. One hotel building on Area #3. No hotel buildings on Areas #2 and/or #3. The proposed project includes approximately 12,000 GSF of meeting rooms and ballrooms (10,000 GSF) and fitness center/restrooms (3,000 GSF). The project evaluated in the 2014 Revised FEIR included approximately 8,000 square feet for fitness and meeting space and approximately 15,000 square feet of common areas, including exterior features such as a pool and spa. The 2014 Revised FEIR did not identify square

Topic	Project Evaluated in 2014 Revised FEIR	Proposed Project	Change (2014 Revised FEIR vs. Proposed Project)
	325 hotel rooms could be in one 10-story structure or two approx. 4-story structures. Maximum total of 500 hotel rooms for East Harbor Island.		footages of amenities associated with future development of up to 325 hotel rooms in one or two hotels (Areas #2 and/or #3), but the PMP Amendment identified amenities that may be incorporated. The types of amenities included in the proposed project (restaurant and bar; meeting and ballrooms; fitness center; retail space) are consistent with the types of "activating uses" described as being "integrated into the development of each hotel" in the 2014 Revised FEIR.
Building Height	For 175-room hotel, approximately 65-foot maximum building height with architectural details and fenestrations that would increase highest point of structure up to 75 feet. EIR assumes the additional 325 rooms could be in one 10-story structure or two approximately 4-story structures.	Single building up to 15 stories, 160 foot maximum building height with 15- to 20-foot tall elevator overruns and mechanical enclosures on top of building for total maximum height of 175- to 180 feet at highest point.	Proposed project would result in taller building height on the proposed project site (westernmost site on East Harbor Island)
Building Materials and Design	Use reflective materials consistent with other existing and proposed waterfront redevelopment around the bay and would require adherence to the City of San Diego's glare regulations (Section 142.0730 of the City Municipal Code).	Limits continuous glass surfaces by alternating glass and solid panels in approximately 50-50 ratio. Includes shimmering accent glass that mimics ocean sun reflections that would be directed away from San Diego International Airport (SDIA) and comprises 2% of overall façade. Project lighting consistent with Lighting Zone standards adopted by Illuminating Engineering Society and International Dark Sky Association and City of San Diego outdoor lighting ordinance (Ordinance Number 20186) that requires outdoor light fixtures to use of drop cast configuration, shielding, or flat lenses. The project design includes LZ2 Moderate ambient lighting where lighting is typically used for safety and activity but is not necessarily uniform or continuous. In addition, lighting levels may be extinguished or reduced as activity levels decline. light emitting diodes (LEDs) lighting would be used throughout the project site. The	Shimmering accent glass. Proposed project would use LED lighting that would not exceed 3,000 Kelvin.

Topic	Project Evaluated in 2014 Revised FEIR	Proposed Project	Change (2014 Revised FEIR vs. Proposed Project)
		proposed LED lighting would not exceed 3000 Kelvin (K).	
Public Pedestrian Access and Circulation	The 175-room hotel and all future hotel development (Areas #2 or #3) allowed by the proposed PMP Amendment would include construction of a public promenade within the proposed leasehold hotel along Harbor Island East Basin frontage.	Public promenade along East Basin frontage of Area #3, pedestrian pathways through the project site, and improvements to the Open Space parcel including landscaping, signage, mini destinations, and an on-site delineated pedestrian pathway	The proposed project would provide a public promenade along the East Basin frontage of Area #3; the project evaluated in the 2014 Revised FEIR would have provided a public promenade along Area #1 (for the 175-room hotel) and along Area #2 and Area #3 (if two hotels totaling up to 325 rooms were built on each site) or Area #3 (if one hotel totaling up to 325 rooms were built on this site).
Off-site Infrastructure Improvements	Infrastructure realignment: New water and sewer pipelines proposed underneath Harbor Island Drive. In accordance with City requirements, a redundant loop connection would be installed, consisting of a 12-inch water line that would extend from a connection point in Harbor Island Drive to the hotel site (Area #1). Electrical, gas, telephone connections, and a storm drain system serving the hotel are proposed beneath Harbor Island Drive. Two new commercial fire hydrants for fire service and domestic service would be built to serve the proposed hotel. Roadway realignment: A section of Eat Harbor Island Drive located immediately south of the proposed 175 room hotel (Area #1) would be realigned. East Harbor Island Drive would be reduced in width by approximately 12 feet by removing one of the two westbound lanes for a total distance of approximately 370 feet. The number of lanes in the vicinity of the hotel would be reduced from four to three and would accommodate visitors to the hotel and maintain access to and from the Island Prime and Reuben E. Lee restaurants.	Connection to an existing 16-inch water line in Harbor Island Drive is proposed either west or south of the property (Area #3). Connection to an existing 15-inch sewer line in Harbor Island Drive located south of the property is proposed. There are two, 12-inch vitrified clay pipe (VCP) sewer lines directly servicing the property from the 15-inch VCP Sewer Line. One or both of the 12-inch lines would provide service to the project.	Proposed project does not include infrastructure realignments or roadway realignments evaluated in 2014 Revised FEIR.
Construction			
Time of day	Up to 12 hours per day between 7:00 a.m. to 7:00 p.m., Monday through Saturday.	Eight hours per day between 7 a.m. to 7 p.m. Monday through Friday.	Reduced hours per day and days per week for the proposed project.

Topic	Project Evaluated in 2014 Revised FEIR	Proposed Project	Change (2014 Revised FEIR vs. Proposed Project)
Duration	18 months (non-overlapping) for each hotel (3 hotel buildings total)	24 months (one hotel building total)	Proposed project has a longer construction duration than the individual hotels evaluated in 2014 Revised FEIR, but proposed project includes construction of one hotel instead of up to three, which results in a shorter overall construction duration.
Activities	To address construction for 500 hotel rooms, assumed to comprise three separate hotels (Areas #1, #2, and/or #3), it was assumed that each hotel would be constructed in a separate phase. The three hotels were assumed to include two, 175-room hotels, and one 150-room hotel, for a total of 500 rooms. It was assumed that construction of each hotel would require the following subphases: demolition of existing structures/pavement, grading, paving/foundation construction, building construction, and architectural coatings application. The first hotel (Area #1), which was assumed to include 175 rooms, would require demolition of the existing locker building and parking lot east of the existing marina building. The two additional hotels (Areas #2 and #3) were assumed to require additional demolition of existing paved areas. The first hotel was assumed to be constructed in 2013; second hotel in 2014, and third hotel in 2018, with full buildout of the project by year 2020. Compliance SDAPCD Rule 55 requirements for fugitive dust and Rule 67.0 requirements regarding interior and exterior painting. Foundations were assumed to be constructed using stone columns or Helical Earth Anchor Technology (HEAT anchors). The project would not utilize pile driving.	Hotel construction: Demolition; site preparation; grading; building construction; and paving. Infrastructure improvements: Water, wastewater, gas, telephone, and cable lines would connect to existing connection points located within Harbor Island Drive. Three existing electric lines transecting the site would serve the project. No upgrades to water or sewer lines are proposed. Site drainage would be provided by overland flow and on-site storm drain systems to two existing storm drains along the easterly and northerly boundaries of the site. Compliance SDAPCD Rule 55 requirements for fugitive dust and Rule 67.0 requirements regarding interior and exterior painting. The foundation of the proposed project would be constructed using deep soil mixing (DSM). No pile driving or blasting would occur.	Proposed project includes construction of one hotel building on westernmost site on East Harbor Island (Area #3) instead of up to three across multiple sites (Areas #1, #2, and #3) on East Harbor Island. Proposed project does not involve demolition of any existing buildings. Proposed project would use DSM technique for foundation instead of stone columns or HEAT anchors.
Construction Equipment	Jackhammers, pneumatic impact equipment, saws, and tractors. No pile driving or blasting would occur.	Tractors, backhoes, loaders, excavators, rubber-tired dozers, scrapers, generators, pavers, rollers, graders, compactors, air compressors, cranes, forklifts, and haul trucks. No pile driving or blasting would occur.	Similar construction equipment.
Parking			
Adequate?	Compliant with Tidelands Parking Guidelines.	Compliant with Tidelands Parking Guidelines. 350 parking spaces are proposed.	Both the approved and proposed project comply with Tidelands Parking Guidelines.

3.2.2 Mitigation Measures

The Mitigation Monitoring and Reporting Program (MMRP) for the 2014 Revised FEIR includes two sets of mitigation measures. The first set of measures is applicable to the 175-room hotel project and the second set of measures is applicable to other future hotel development associated with the PMP Amendment. Each set of measures addresses the following environmental topic areas: (1) biological resources; (2) hazards and hazardous materials; (3) noise; (4) geology and soils; (5) public services and utilities; (6) transportation, traffic, and parking; and (7) sea level rise. Each of the mitigation measures has a numerical reference.

Applicable mitigation measures from the 2014 Revised FEIR that would apply to the proposed project are listed in Chapter 4 at the end of each environmental topic discussion provided in the Checklist.

Note that for (1) biological resources, (2) hazards and hazardous materials, (3) noise, (4) geology and soils, and (5) public services and utilities, the MMRP includes the same mitigation measure in each set: once to apply to the 175-room hotel project and the second time to apply to future hotel development under the PMP Amendment. Even though the two measures are the same they were each assigned a different numerical reference number. For example, MM BIO-1 and MM BIO-2 are identical except that the former applies to the 175-room hotel and the latter applies to future hotel development under the PMP Amendment.

The Checklist in Chapter 4 describes when there are identical measures in the 2014 Revised FEIR, and in the discussion of mitigation measures applicable to the proposed project, identifies the numerical reference numbers of the two mitigation measures and explains that only one measure is being presented.

For (6) transportation and traffic, the MMRP for the 2014 Revised FEIR presents six measures (TR-C1 through TR-C6) that would apply to development of the 175-room hotel and eight measures (TR-C7 through TR-C9; TR-C12 through TR-C16) that would apply to the development of 500 hotel rooms. To mitigate traffic impacts the development of up to 500 hotel rooms would require more intersection and street segment improvements than the 175-room hotel, and would require payment of greater fair share contributions toward intersection and street segment improvements than the 175-room hotel. Because the proposed project would include up to 450 hotels rooms, the checklist in Chapter 4 evaluates the eight measures (TR-C7 through TR-C9; TR-C12 through TR-C16) that would apply to the development of 500 hotel rooms for their applicability to the proposed project. Because the proposed project involves more than 175 rooms, the mitigation measures identified for the 175-room hotel in the 2014 Revised FEIR would not apply to the proposed project.

The MMRP for the 2014 Revised FEIR includes one mitigation measure for (7) sea level rise (MM SLR-C1).

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4 ENVIRONMENTAL CHECKLIST

4.1 AESTHETICS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/ No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No	Yes
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?	No	No	Yes
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to aesthetic resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to aesthetic resources. The impact analysis below includes discussion for each of these checklist questions.

4.1.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify any potentially significant impacts to aesthetic resources. The impact analysis addressed the potential effects on the four designated Precise Plan Vista Areas described in the Port Master Plan (PMP) that are located on Harbor Island (Section 9.2.3.2.1 of Revisions to Draft EIR). Impacts related to scenic vistas were determined to be less than significant based on evaluation of views from three key observation points (KOPs). The three KOPs evaluated in the 2014 Revised FEIR were determined to be the most representative of the project's potential effects on views of the project site due to their proximity to the project site, scenic quality, viewer concern levels, view duration, intactness, and uniqueness; 18 total locations were considered before the three KOPs were ultimately selected for analysis (Section 4.3.2.1 of the Draft EIR). As part of the analysis of scenic vista impacts the 2014 Revised FEIR provides massing simulations of the 175-room hotel within the three KOPs (refer to Draft EIR Figures 4.3-2 through 4.3-7 [Section 4.3 of the Draft EIR] for locations of the three KOPs and the massing simulations) but does not include massing simulations of future development of 325 rooms in one or two hotels within the three KOPs under the PMP Amendment; the impacts of future hotel development on scenic vistas within the three KOPs is

analyzed qualitatively in the 2014 Revised FEIR. The locations and views from the three KOPs are described in more detail as part of the aesthetic resources impact analysis in Section 4.1.4.

The 2014 Revised FEIR analysis found that no impacts on scenic resources would occur because no scenic resources or historic buildings exist on the project site (Section 9.2.3.2.2 of Revisions to Draft EIR). Regarding visual character and quality, Section 9.2.3.2.3 of Revisions to Draft EIR concludes that impacts would not be adverse because future hotels would replace existing surface parking areas and other areas of low visual value. Existing surface parking lots and non-cohesive landscaping schemes would be replaced with buildings and landscaping that would be designed to establish a cohesive visual scheme. In addition, the open water views of the bay would be unaffected by development of the hotels. As a result, the future development allowed by the PMP Amendment would result in a less-than-significant impact on the visual character and quality of the site and its surroundings. In addition, because the project would be consistent with the outdoor lighting and glare regulations of the City of San Diego Municipal Code, impacts related to light and glare would be less than significant (Section 9.2.3.2.4 of Revisions to Draft EIR). The 2014 Revised FEIR did not include mitigation measures or specific conditions as impacts were concluded to be less than significant.

4.1.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to aesthetics, the proposed project would result in a taller building on the project site relative to the project evaluated in the 2014 Revised FEIR. The proposed project would include 450 hotel rooms within a single building up to 15-stories tall (160 feet maximum height above ground level with mechanical enclosures and elevator overruns up to a maximum height of 180 feet above ground level) on the westernmost site on East Harbor Island instead of the 500 rooms distributed across two or three new hotel buildings evaluated in the 2014 Revised FEIR. With respect to the proposed project site, the 2014 Revised FEIR evaluates two scenarios: one in which 325 hotel rooms are developed within a single 10-story building, and a second in which 325 hotel rooms are developed within two 4-story buildings: one on the project site and the other on the parcel immediately east of the proposed project site. A 175-room hotel 65 feet maximum height above ground level with architectural details and fenestrations up to a maximum height of 75 feet above ground level would not be constructed on the parcel immediately east of the Sunroad Resort Marina as part of the proposed project. In addition, the proposed project would use shimmering accent glass that mimics ocean sun reflections on approximately 2% of the overall building facade and light emitting diode (LED) technology for outdoor lighting. No other changes to the proposed project that relate to aesthetics are proposed.

4.1.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to aesthetics have been identified during the preparation of this checklist.

4.1.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to a substantial adverse effect on a scenic vista, including the six PMP Vista Areas in Planning District 2 and the three KOPs evaluated in the 2014 Revised FEIR; substantial damage to scenic resources within the San Diego-Coronado Bay Bridge, which a designated State scenic highway; or conflicts with applicable zoning and other regulations governing scenic quality. The six PMP Vista Areas in Planning District 2 and the three KOPs evaluated in the 2014 Revised FEIR are shown on Figure 4-1.

The proposed project would result in an up to 15-story, 450-room building on the westernmost site on East Harbor Island, which is up to five stories taller than the 10-story, 325-room hotel building described in the 2014 Revised FEIR. The proposed project would not include development of any hotels on the parcels immediately east and west of the Sunroad Resort Marina as described in the 2014 Revised FEIR. There are no changes in circumstances or new information identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects. For the reasons provided below the proposed project would not: result in new significant adverse effects on scenic vistas from PMP Vistas Areas or KOPs, substantially damage scenic resources, including within a state scenic highway, or conflict with applicable zoning or other regulations governing scenic quality.

PMP Vista Areas and KOPs

Two Vista Areas are northwest of the Project site in Spanish Landing Park. These Vista Areas offer broad panoramas of San Diego and the surrounding environment, and the proposed project site is not visible from these Vista Areas. The other four Vista Areas are located south, southeast, and southwest of the project site along the bayside promenade along the southern portion of Harbor Island Drive: at the terminus of the promenade on the southeastern extent of Harbor Island; at the Harbor Island Drive T-intersection; at the public park on West Harbor Island; and at the west end of Harbor Island. Scenic views from these four Vista Areas are oriented south, east, and west toward and across open water within San Diego Bay, and include the downtown San Diego skyline and therefore would be unaffected by the changes in the proposed project, which would occur to the north, northeast, and northwest of these four Vista Areas on a portion of the same project site included in the 2014 Revised FEIR. Section II of the PMP includes Goal VIII regarding enhancement and maintenance of the attractiveness of the bay and tidelands as physical and biological entities and includes the following policies:

- Each activity, development, and construction should be designed to best facilitate its particular function, which function should be integrated with and related to the site and surroundings of that activity.
- Views should be enhanced through view corridors, the preservation of panoramas, accentuation of vistas, and shielding of the incongruous and inconsistent.

Source: Figure 4.3-2 from the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea PMP Amendment Draft EIR, adapted by Ascent Environmental in 2020.

Figure 4-1 PMP Vista Areas and KOPs Evaluated in the 2014 Revised FEIR

The 2014 Revised FEIR evaluates substantial adverse effects on scenic vistas from three KOPs. The analysis evaluated the effects of the four-story 175-room hotel on the parcel immediately east of the Sunroad Resort Marina and development of two additional four-story hotels totaling 325 rooms or one additional 10-story, 325-room hotel on the proposed project site. The analysis included massing simulations of the four-story 175-room hotel from the three KOPs. Massing simulations were not prepared for development of two additional four-story hotels totaling 325 rooms or one additional 10-story, 325-room hotel on the proposed project site; future hotel development under the PMP Amendment was evaluated qualitatively in the 2014 Revised FEIR for impacts on scenic vistas from the three KOPs. The 2014 Revised FEIR concludes that no significant impacts to scenic vistas from KOPs would result because the future hotels would be in scale with other hotel development on Harbor Island and would not obstruct scenic views of scenic vistas. The impacts of the proposed project on scenic vistas from KOPs 1-3 are compared to the impact conclusions of the 2014 Revised FEIR below (Revision to Draft EIR, Section 9.2.3.2.1, starting at page 9.2.3-2). The below discussion explains the reasons why the proposed project would not result in new significant impacts to scenic vistas from KOPs 1-3.

KOP 1 is located on the East Harbor Island waterfront promenade immediately south of the project site on the opposite side of East Harbor Island Drive and just east of the pocket parking area along eastbound East Harbor Island Drive. The view from KOP 1 is panoramic and extends over 180° to the south (right) and west encompassing the San Diego skyline, the San Diego- Coronado Bay Bridge, Coronado, and the Point Loma peninsula. With respect to views from KOP 1, the 2014 Revised FEIR concluded that construction of two additional four-story hotels or one additional 10-story hotel, in addition to the proposed 175-room hotel, would not substantially alter the visual character and quality of views from KOP 1. This is because the hotels would be located north-northwest of KOP 1, and views from KOP 1 are focused to the west and south.

Same as the project evaluated in the 2014 Revised FEIR, the proposed project would not result in substantial adverse effects on views from KOP 1 of open water, the San Diego skyline, the San Diego-Coronado Bay Bridge, Coronado, or the Point Loma peninsula. Figure 4-2 compares a massing simulation of the project evaluated in the 2014 Revised FEIR with a massing simulation of the proposed project for KOP 1. In fact, the proposed project would not result in development within the viewshed of KOP 1 because it would only provide a single hotel building on the westernmost parcel on East Harbor Island; the proposed hotel building would not be visible within KOP 1. The project evaluated in the 2014 would result in more visual change within the viewshed of KOP 1 because it included a four-story 175-room hotel on the site immediately east of the Sunroad Resort Marina, which would be visible within the viewshed of KOP 1.

KOP 2 is located in the North Embarcadero Area between the former Anthony's Restaurant and the Star of India along the promenade near North Harbor Drive and West Ash Street, approximately 1.2 miles from the eastern edge of the proposed project site, with views oriented west-northwest toward the project site. The viewshed of KOP 2 is dominated by open water and vessels moored at the outer end of the Maritime Museum's pier. The restaurants on the eastern tip of Harbor Island and moored vessels in the Sunroad Resort Marina are visible in the very back of the viewshed. The three existing hotels on West Harbor Island are the most distinguishable features in the near background. More distant in the background is the Point Loma peninsula. With respect to views from KOP 2, the 2014 Revised FEIR concluded that construction of two additional four-story hotels or one additional 10-story hotel, in addition to the proposed 175-room hotel, would not substantially affect the expansive high value views of the open waters of San Diego Bay. It further concludes that upper floors of future hotels may be visible, and the view towards much of the south wing of the Sheraton's east tower may be blocked by future hotels, and the upper floors of the Sheraton's east tower would remain visible. Regarding construction of an additional 10-story hotel, the 2014 Revised FEIR concludes it would be a similar scale as other existing hotels on Harbor Island and consistent with its surroundings when viewed across a distance of one mile from KOP 2.

Same as the project evaluated in the 2014 Revised FEIR, the proposed project would not result in substantial adverse effects on views from KOP 2. Figure 4-3 compares a massing simulation of the project evaluated in the 2014 Revised FEIR with a massing simulation of the proposed project for KOP 2. The predominate views of open water in San Diego Bay and moored vessels at the outer end of the Maritime Museum's pier would be unaffected by the changes in the project. The distant background view of the Point Loma peninsula also would be unchanged because it is

located to the south of the project site. Similar to the project evaluated in the 2014 Revised FEIR, the upper floors of the proposed project would be visible from KOP 2. The proposed project would have similar massing as the 10-story building evaluated in the 2014 Revised FEIR, and therefore would similarly result in blockage of views of the existing Sheraton Hotel.

Source: Figure 4.3-5 from the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea PMP Amendment Draft EIR.

KOP 1 – Massing Simulation – 175-Room Hotel Project Evaluated in 2014 Revised FEIR

Source: Image provided by Sunroad Enterprises in 2020.

KOP 1 – Massing Simulation – Proposed Project*
*Proposed project is located north of KOP 1 and is not visible within this viewshed

Figure 4-2 Comparison of Massing Simulations for KOP 1

Source: Figure 4.3-6 from the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea PMP Amendment Draft EIR.

KOP 2 – Massing Simulation – 175-Room Hotel Project Evaluated in 2014 Revised FEIR

Source: Image provided by Sunroad Enterprises in 2020.

KOP 2 – Massing Simulation – Proposed Project

Figure 4-3 Comparison of Massing Simulations for KOP 2

The primary change to the scenic vista from KOP 2 as a result the changes to the project would be the replacement of views of a 10-story hotel building on the project site and four-story building on the site immediately east of the Sunroad Resort Marina with views of the proposed project's 15-story building in the background of the KOP 2 viewshed. However, these changes would not substantially alter the effects to this scenic vista compared to the conclusions of the 2014 Revised FEIR. While the proposed project would be up to five stories taller than the 10-story project evaluated in the 2014 Revised FEIR, and approximately five stories taller than the approximately 10-story hotel buildings located on West Harbor Island that also appear in the background of this scenic vista, it would be located approximately 1.25 miles from KOP 2. From this distance, the additional five stories of height would not meaningfully alter the scenic quality of this scenic vista because the amount of change between the proposed project and the 10-story project evaluated in the 2014 Revised FEIR, and between the proposed project and the existing approximately 10-story buildings on West Harbor Island, would be in the background and therefore would be minimally-to-not apparent to viewers from KOP 2. Viewers from KOP 2 would be 1.25 miles away from the proposed project and would be focused on the foreground views of open water in San Diego Bay and moored vessels at the outer end of the Maritime Museum's pier that predominate this scenic vista and would be unaffected by the proposed project.

KOP 3 is a water-oriented vantage point located on the bay's main ship channel approximately 0.6 mile southwest of the proposed project site. Views from this KOP are experienced by recreational boaters and harbor excursion patrons. Due to its inherent flatness and lack of visual obstructions, this viewshed is highly panoramic with multiple focal points in every direction. Most of the viewshed of KOP 3 is composed of the open waters of San Diego Bay. On sunny summer weekends the viewshed can be crowded with boats. Because of the close proximity of marinas, this area is often crowded with pleasure craft. The silhouette of San Diego's Uptown district is in the northeast of the view's background. With respect to views from KOP 3, the 2014 Revised FEIR concludes that construction of two additional four-story hotels or one additional 10-story hotel, in addition to the proposed 175-room hotel, would not substantially affect this viewshed. The 2014 Revised FEIR concludes that the high-value views of the open waters of San Diego Bay would remain unchanged, and the strong horizontal line of the breakwater would be unaltered. Future hotel developments would not be out of scale with structures currently existing on West Harbor Island, and could become a focal point of this view, which is currently scenic but rather featureless. The future hotels would not obstruct any important view corridors nor would they be inconsistent with the surrounding development. In addition, there are no PMP Vista Areas in the vicinity of this vantage point.

Same as the project evaluated in the 2014 Revised FEIR, the proposed project would not result in substantial adverse effects on scenic views from KOP 3. Same as described in the 2014 Revised FEIR, the proposed project would not affect the existing high-value views of open water or the strong horizontal line of the breakwater from this KOP. Figure 4-4 compares a massing simulation of the project evaluated in the 2014 Revised FEIR with a massing simulation of the proposed project for KOP 3.

The primary change to the scenic vista from KOP 2 as a result the changes to the project would be the replacement of views of a 10-story hotel building on the project site and four-story building on the site immediately east of the Sunroad Resort Marina with views of the proposed project's 15-story building in the background of the KOP 2 viewshed. However, these changes would not substantially alter the effects to this scenic vista compared to the conclusions of the 2014 Revised FEIR. While the proposed project would be up to five stories taller than the 10-story project evaluated in the 2014 Revised FEIR, and approximately five stories taller than the approximately 10-story hotel buildings located on West Harbor Island that also appear at a similar distance in this scenic vista, it would be located approximately 0.6 mile from KOP 3. From this distance, the additional five stories of height would be more noticeable to viewers than the 10-story project evaluated in the 2014 Revised FEIR, as would the change in height between the proposed project and the existing approximately 10-story buildings on West Harbor Island. However, the additional five stories in the proposed project would not obstruct any important view corridors of scenic resources, and would appear at or below the level of buildings that are present along the background ridgelines. The proposed project would be five stories taller than existing hotels on West Harbor Island, but this level of change, when viewed from a distance of 0.6 mile, would appear different but not out of scale with the existing hotels. Moreover, same as the project evaluated in the 2014 Revised FEIR, the proposed project would include building exteriors with texture and colors, and landscaping that would reduce the level of contrast between the proposed project and the visual background and result in a cohesive visual scheme for East Harbor Island.

Source: Figure 4.3-7 from the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea PMP Amendment Draft EIR.

KOP 3 – Massing Simulation – 175-Room Hotel Project Evaluated in 2014 Revised FEIR

Source: Image provided by Sunroad Enterprises in 2020.

KOP 3 – Massing Simulation – Proposed Project

Figure 4-4 Comparison of Massing Simulations for KOP 3

Unlike the project evaluated in the 2014 Revised FEIR, the proposed project would include shimmering accent glass that mimics ocean sun reflections on the building façade that would be visible from this KOP, which would further integrate the project into this viewshed, which is dominated by views of open water. The proposed project would not obstruct views of the Uptown skyline from this location because these views are located to the east of the proposed project site in the background of eastern edge of East Harbor Island where the four-story 175-room hotel was proposed.

Scenic Highways

The 2014 Revised FEIR noted that views of the project site from Coronado are either public views at a distance of more than one mile or, if less than one mile, are private views or views from Naval Air Station North Island, which is inaccessible to the public. East Harbor Island is faintly visible from the San Diego-Coronado Bay Bridge, which is a California State-designated Scenic Highway. East Harbor Island is located approximately two miles northwest of the bridge.

Because these public views are, at minimum, more than one mile from the proposed project site, the changes to the project on the westernmost site on East Harbor Island including the additional up to five stories of building height would result in a minimal level of change to scenic vistas relative to the project evaluated in the 2014 Revised FEIR; the additional building height would be scarcely visible from such large distance and hotel development on the project site would represent one modest component of an expansive landscape within this viewshed. In addition, the proposed project would not include development of any hotels on the parcels immediately east and west of the Sunroad Resort Marina, resulting in a reduction of horizontal building massing within these viewsheds. In addition, the change in project building materials to include shimmering accent glass that mimics ocean sun reflections would not adversely affect the views of open water that predominate the views of East Harbor Island from Coronado and the San Diego-Coronado Bay Bridge. Therefore, the changes to the project would not result in substantial increases in adverse effects on scenic vistas from Coronado or views of scenic resources from the San Diego–Coronado Bay Bridge relative to the project evaluated in the 2014 Revised FEIR. And same as the project evaluated in the 2014 Revised FEIR, the proposed project would not result in adverse effects on scenic resources because there are no scenic resources located on the project site. And finally, the project is consistent with the current land use designations of Commercial Recreation (6.43 acres) and Open Space (1.12 acres) and associated development regulations of the PMP.

The 2014 Revised FEIR did not identify significant impacts related to substantial adverse effects on scenic vistas, substantial damage to scenic resources, including within a state scenic highway, or conflicts with zoning or regulations governing scenic quality and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to these aesthetics impacts.

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

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to creating new sources of substantial light or glare which would adversely affect day or nighttime views in the area. While glass windows would be present, no façade of the building would be composed entirely of glass. Alternating glass and solid panels in an approximately 50% to 50% ratio would result in limited continuous glass surfaces. Glass windows would be interspersed with solid panels, which would break up glass reflections and reduce overall transparency. Approximately 96% of the glass surfaces would be low E blueish gray tinted glass with a visible light exterior reflectance value of 25%. The remaining glass would consist of angled glazed panels with a 32% visible exterior light reflectance and with a warmer color coating. The ground level glass would use a low E storefront glazing system.

The changes in the project described above include using shimmering accent glass that mimics ocean sun reflections on approximately 2% of the overall building façade (which was not described as part of the project evaluated in the 2014 Revised FEIR) and using LED lighting, rather than incandescent, high-pressure solidum and/or fluorescent

lighting. Shimmering accent glass and LED lighting may result in increased light and glare. However, similar to the project evaluated in the 2014 Revised FEIR, the proposed project would be consistent with the City of San Diego Municipal Code Section 142.0730, which allows no more that 50% of a building's exterior to have a reflectivity factor greater than 30%; and, regarding LED lighting, Section 142.0740 requires outdoor light fixtures to be installed in a manner that minimizes light trespass, glare, and urban sky glow. Site lighting would be consistent with Lighting Zone standards adopted by the Illuminating Engineering Society and International Dark Sky Association and the City of San Diego outdoor lighting ordinance (Ordinance Number 20186) that requires outdoor light fixtures to limit light pollution through the use of drop cast configuration, shielding, or flat lenses. The project design includes LZ2 Moderate ambient lighting where lighting is typically used for safety and activity but is not necessarily uniform or continuous. In addition, lighting levels may be extinguished or reduced as activity levels decline. Energy efficient light-emitting diode (LED) lighting would be used throughout the project site, instead of the incandescent, high-pressure sodium and/or fluorescent fixtures proposed in the 2014 Revised FEIR. and the LED lighting would not exceed 3000K. Thus, the project would not result in a substantial increase in sources of light and glare.

There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to substantial light or glare.

The 2014 Revised FEIR did not identify significant impacts related to substantial increase in light and glare and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to sources of substantial light or glare.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to aesthetics.

4.2 AGRICULTURE AND FOREST RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	No	No	Yes
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	No	Yes
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No	No	Yes
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	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to agriculture and forest resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to agriculture and forest resources. The impact analysis below includes discussion for each of these checklist questions.

4.2.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR addressed agricultural resources in Section 7.3, Effects Found Not to be Significant. As stated in Section 7.3.1, Agricultural Resources, the project site is fully developed and is not used for agricultural or forest purposes. No potentially significant agriculture or forest resources impacts were identified in the 2014 Revised FEIR.

4.2.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project that relate to agriculture and forest resources are proposed.

4.2.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to agriculture and forest resources has been identified during the preparation of this checklist.

4.2.4 Impact Analysis

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?

There are no changes in the proposed project identified above that would require major revisions to the EIR or result in new significant effects related to agriculture and forest resources. Similarly, there are no changes in circumstances or new information which was not known and could not have been known that would require major revisions to the EIR or result in new significant effects related to impacts on agricultural or forest resources.

No potentially significant agricultural or forest resources impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required. The project site consists of an asphalt parking lot and is not zoned for agricultural, timberland, or forest uses or subject to a Williamson Act contract. Thus, the project would not result in a new significant agriculture or forest resources impact.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to agriculture and forest resources.

4.3 AIR QUALITY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
III. Air Quality			
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations. Would the project:			
a) Conflict with or obstruct implementation of the applicable air quality plan?	No	No	Yes
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	No	No	Yes
c) Expose sensitive receptors to substantial pollutant concentrations?	No	No	Yes
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to air quality, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to air quality. The impact analysis below includes discussion for each of these checklist questions.

4.3.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify any potentially significant air quality impacts and no mitigation measures or specific conditions were identified. The 2014 Revised FEIR concluded that the project would be consistent with the Regional Air Quality Strategy (RAQS) and State Implementation Plan (SIP) because of its consistency with the growth assumptions of the PMP and, therefore, would have a less-than-significant impact regarding conflicting with or obstructing an applicable air quality plan (Revisions to Draft EIR Section 9.2.7.2.1). Standard control measures would be implemented to reduce dust generated during construction, and the requirements presented in San Diego Air Pollution Control District (SDAPCD) Rule 67.0, which include limiting the reactive organic gas (ROG) content of most coatings to 150 g/l and specifying that a high-volume/low-pressure spray nozzle be used to limit overspray, would be met during the architectural coatings phase. During operations, the primary source of airborne emissions was determined to be motor vehicle traffic, which was identified as an average daily traffic (ADT) volume of 1,225 for the initial 175-room hotel, and 2,600 ADT for the additional two hotels totaling 325 rooms, resulting in 3,825 ADT.

Based on guidance provided in Appendix G of the State CEQA Guidelines and the County of San Diego Guidelines for Determining Significance for Air Quality, a project would result in a significant impact if it would:

1. Conflict with or obstruct implementation of the RAQS and/or applicable portions of the SIP.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard in exceedance of the following thresholds (also see Table 4-1):
    a. 100 pounds per day or 15 tons per year of PM_{10}

b. 55 pounds per day or 10 tons per year of $PM_{2.5}$ (in 2014, the daily threshold was 67 pounds per day)

c. 250 pounds per day or 40 tons per year of NO_X

d. 250 pounds per day or 40 tons per year of oxides of sulfur (SO_X)

e. 550 pounds per day or 100 tons per year of CO

f. 75 pounds per day or 13.7 tons per year of ROG

3. Expose sensitive receptors to substantial pollutant concentrations, such that:

   a. The project places sensitive receptors near CO "hotspots" or creates CO "hotspots" near sensitive receptors.

   b. Project implementation will result in exposure to TACs resulting in a maximum incremental cancer risk greater than one in one million without the application of Toxic Best Available Control Technology (T-BACT) or a health hazard index greater than one.

4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, such that:

   a. The project places a new odor-producing land use activity adjacent to sensitive receptors or places sensitive receptors adjacent to or near an odor-producing land use (including wastewater treatment facilities, animal facilities, organic agricultural operations, or agricultural operations that apply odor producing chemicals)

The significance thresholds listed above, which were adopted by the County of San Diego based on SDAPCD's Rule 20.2, were used as CEQA thresholds for significance determinations in the 2014 Revised FEIR. Construction and operational emissions analyzed in the 2014 Revised FEIR were below these thresholds and, therefore, would not violate ambient air quality standards, result in cumulatively considerable net increases of any nonattainment criteria pollutant, or result in localized carbon monoxide (CO) impacts (Revisions to Draft EIR Sections 9.2.7.2.2, 9.2.7.2.3, 9.2.7.2.4, and 9.3). Additionally, the 2014 Revised FEIR also concluded that sensitive receptors would not be exposed to substantial pollutant concentrations, including diesel particulates and CO hotspots and, therefore, impacts would be less than significant (Section 9.2.7.2.4). Impacts related to objectionable odors were also concluded to be less than significant (9.2.7.2.5).

4.3.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to air quality, the proposed project would involve construction of a single, 450-room hotel, 15 stories high on the westernmost site on East Harbor Island, rather than up to three smaller, 150-to 175-room hotels totaling 500 rooms and located on multiple sites on East Harbor Island (including the proposed project site and the sites immediately east and west of the Sunroad Resort Marina). Regarding trip generation, the proposed project would result in 3,600 ADT, which is 225 fewer ADT than the 3,825 ADT that would result from the project evaluated in the 2014 Revised FEIR. The trip generation estimate for the proposed project is provided in Appendix H.

Regarding construction duration, the proposed project would be built over a 24-month period. This differs from the project evaluated in the 2014 Revised FEIR, which assumed that construction of up to three separate hotel buildings would occur during separate, non-overlapping periods of 18 months each. Additionally, the proposed project would involve construction activities up to 8 hours per day, five days week, rather than up to 12 hours per day, six days per week, which was assumed in the 2014 Revised FEIR. Finally, the proposed project would not include the construction of off-site roadway and infrastructure realignments within Harbor Island Drive right-of-way that are described in the 2014 Revised FEIR and would not include demolition of the existing marina locker building.

As with the project evaluated in the 2014 Revised FEIR, energy conservation and sustainability features would be incorporated into the design and construction of the proposed project. These features, as outlined below and

evaluated in the 2014 Revised FEIR, were determined to provide energy and water efficiency upgrades resulting in a 15 percent improvement over the 2008 requirements described in California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations; California Energy Code), which are incorporated into the California Building Code (CBC). The CBC has been updated multiple times since the 2008 standards were applicable. The 2019 CBC, and specific requirements applicable to nonresidential and residential construction, are currently effective. The updates to the CBC are relevant because the more recent iterations of the CBC have increased nonresidential building efficiency markedly through demanding energy efficiency measures.

According to the California Energy Commission, nonresidential buildings adhering to the 2019 CBC "will use about 30 percent less energy due mainly to lighting upgrades" than those constructed under the 2016 CBC (i.e., the amount of energy used under 2019 CBC compliance is 70% of the amount used under 2016 CBC compliance) (CEC 2018). Moreover, the 2016 standards required five percent greater efficiency than the 2013 standards (i.e., the amount of energy used under 2016 CBC compliance was 95% of the amount used under 2013 CBC compliance) (CEC 2017), which in turn were 30 percent more efficient than the 2008 standards (i.e., the amount of energy used under 2013 CBC compliance is 70% of the amount used under 2008 CBC compliance) (UC Davis 2014). Because of these changes, nonresidential buildings constructed to 2019 CBC requirements consume 53.5 percent less energy than nonresidential buildings built to 2008 CBC requirements.[1] As a result, by complying with the 2019 CBC the proposed project would be substantially more energy efficient than the project evaluated in the 2014 Revised FEIR, which would have exceeded 2008 CBC energy efficiency standards by 15%.

It should also be noted that updates to the CBC may have made some of the energy conservation and sustainability project design features included in the project evaluated in the 2014 Revised FEIR and identified below inapplicable to the proposed project because 2019 CBC requirements may actually require greater energy efficiency measures. Nevertheless, as a condition of approval, the proposed project would comply with the applicable (currently 2019) energy and water efficiency regulations of the CBC (Title 24, Part 6), and would incorporate the design features related to air quality described below if they are more stringent than, and not already included in, the measures that would be implemented to meet the 2019 CBC requirements. The project analyzed in the 2014 Revised FEIR would have exceeded the 2008 energy efficiency standards by 15 percent. Because 2019 CBC requirements are estimated to increase efficiency approximately 53.5% over 2008 CBC standards, the currently proposed project would be more energy efficient than the project evaluated in the 2014 Revised FEIR.

Construction

- Reuse or recycle at least 75% of construction materials (including soil, asphalt, concrete, metal, and lumber).
- 10% of building materials and products that would be used are locally or regionally (within 500 miles) extracted and manufactured, when available.
- Implement Green Building Initiatives, including low VOC emitting finishes, adhesives, and sealants.

Building Sustainability

- Install efficient HVAC system with refrigerant with an Ozone Depletion Potential of zero.
- Install Energy Star, "cool" or light-colored roofing for at least 75% of the roof area, cool pavements, and shade trees.
- Use dual pane low-E windows with a minimum of 0.3 solar heat gain coefficient.
- Install R-value optimized wall and roof insulation. Use better-than-code energy efficient lighting throughout the building and site.
- Utilize filtered and controlled natural ventilation to reduce heating and air conditioning demand by 10%.

[1] Nonresidential energy use improvement, 2019 CBC relative to 2008 CBC is calculated using the following equation: 70% [2019 vs. 2016] * 95% [2016 vs. 2013] * 70% [2013 vs. 2008] = 46.5%. Because the amount of energy used under 2019 CBC is 46.5% of the amount of energy that would have been used under the 2008 CBC, the 2019 CBC is therefore 53.5% more efficient than the 2008 CBC.

- Incorporate engineering design system measures – variable speed chillers, fans, and pumps, boiler and chiller controls; heat recovery; smart auto thermostats; and CO_2 sensors for meeting rooms.
- Use Energy Star appliances for all eligible equipment and fixtures.
- Use solar heating, automatic covers, and efficient pumps and motors for pools and spas.
- Install LEDs for 50% of all the outdoor lighting (except in parking lots, which would use T-5 lighting or equivalent).
- Limit hours of outdoor lighting for 100% of the site lighting by using photocell controls.
- Utilize natural daylight for 75% of the regularly occupied spaces.

Transportation

- Limit idling time for commercial vehicles, including deliveries and construction vehicles, to 5 minutes.
- Install bicycle parking facilities.
- Provide a shuttle service to and from the airport. It is estimated that the shuttle would reduce the total number of trips by 7.5% (note this trip reduction estimate is not included in the trip generation analysis performed for the proposed project and described in this checklist in Section 4.17. "Transportation").

Since certification of the 2014 Revised FEIR, air quality regulations affecting on- and off-road vehicles, construction equipment, and stationary sources have become increasingly stringent, and include lower emissions limits and cleaner engine requirements. As a result, vehicles and construction equipment operating as part of the proposed project would generate smaller quantities of pollutants than before. Thus, airborne emissions resulting from the operation of construction equipment, mechanical equipment, and motor vehicles as part of the proposed project would have a smaller impact on air quality than when the 2014 Revised FEIR was certified.

There are no other changes to the proposed project that relate to air quality.

4.3.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to air quality have been identified during the preparation of this checklist.

4.3.4 Impact Analysis

Would the project:

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

All areas designated as nonattainment under the Clean Air Act (CAA) or California Clean Air Act (CCAA) are required to prepare plans showing how the region would meet the state and federal air quality standards by its attainment dates. San Diego county is designated as being in nonattainment with both the California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) for ozone and the CAAQS for PM_{10} and $PM_{2.5}$. SDAPCD prepared a San Diego County Regional Air Quality Strategy (RAQS) in 2009, and a Revised RAQS in 2016, as a plan for improving air quality in the San Diego Air Basin (SDAB) by addressing requirements of the CAA and CCAA and presenting strategies to achieve and maintain attainment with ambient air quality standards. The project analyzed in the 2014 Revised FEIR was subject to the 2009 RAQS, while the currently proposed project would be subject to the 2016 Revised RAQS, which presents strategies to achieve additional reductions of ozone precursor emissions relative to the 2009 RAQS.

The changes in the proposed project identified in the previous section would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to conflicting with or obstructing implementation of an applicable air quality plan because the project would include fewer hotel rooms, fewer vehicle trips, implement significantly more efficient building standards as required by updates to the California Energy Code (Title 24), and reduced construction activity when compared to the project evaluated in the 2014 Revised FEIR. In addition, the proposed project would include equivalent or more efficient design features related to construction, building sustainability, and transportation. The proposed project would be consistent with the land use designations and, therefore, growth assumptions of the PMP, which anticipate up to 500 hotel rooms on the proposed project site and, therefore, would be consistent with the RAQS and SIP.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to conflicts with an air quality plan. The relatively stricter regulations and technology improvements related to construction equipment and vehicles, as well as changes to the California Energy Code that would result in more efficient consumption of electricity, natural gas, gasoline, and diesel, would not result in new significant effects because these changes would result in lower air pollutant emissions when compared to the project evaluated in the 2014 Revised FEIR.

The 2014 Revised FEIR did not identify significant effects related to conflicting with or obstructing implementation of an applicable air quality plan and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to applicable air quality plans.

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

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or state ambient air quality standard. San Diego County is considered a nonattainment area with respect to the 8-hour NAAQS for ozone, and a nonattainment area with respect to the 1-hour and 8-hour CAAQS for ozone and the CAAQS for PM_{10} and $PM_{2.5}$. The proposed project would include fewer hotel rooms, fewer vehicle trips, implement significantly more efficient building standards as required by updates to the California Energy Code (Title 24), similar types of construction equipment, and 4 fewer hours per day of construction activity (8 hours per day)as compared to the project evaluated in the 2014 Revised FEIR (up to 12 hours per day). Additionally, the proposed project would include equivalent or more efficient design features related to construction, building sustainability, and transportation. Therefore, the proposed project would not result in a new significant impact when compared to the project evaluated in the 2014 Revised FEIR.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under an applicable federal or state ambient air quality standard. The relatively stricter regulations and technology improvements related to construction equipment and vehicles and changes to the State building code resulting in more efficient consumption of electricity, natural gas, gasoline, and diesel would not result in new significant effects when compared to the project evaluated in the 2014 Revised FEIR.

The proposed project would involve construction of 450 hotel rooms in a single building. For purposes of air quality construction modeling, the project evaluated in the 2014 Revised FEIR assumed three hotels would be construction during three, non-overlapping phases. The 2014 Revised FEIR construction scenario with the highest maximum daily rate of emissions was the construction of a 175-room hotel. Nevertheless, same as the project evaluated in the 2014 Revised FEIR, the daily maximum and annual construction emissions of the proposed project, presented in Table 4-1, would not exceed the significance thresholds established by SDAPCD (detailed modeling results are presented in Appendix A). While the maximum daily $PM_{2.5}$ construction emissions associated with the proposed project (19 lb/day) are higher than for the project analyzed in the 2014 Revised FEIR (3.2 lb/day), proposed project emissions remain below the current threshold of 67 lb/day and the threshold of 55 lb/day used in the 2014 Revised FEIR.

Also, same as the project evaluated in the 2014 Revised FEIR, daily and annual operational emissions of the proposed project once construction is complete, presented in Table 4-2, would also not exceed the significance thresholds SDAPCD (detailed modeling results are presented in Appendix A Because the proposed project emissions would not exceed the SDAPCD significance thresholds, there would be no cumulatively considerable net increase of any criteria pollutant resulting from construction or operation of the proposed project.

The 2014 Revised FEIR did not identify significant impacts related to a cumulatively considerable net increase of any criteria pollutants for which San Diego County held nonattainment status and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to cumulatively considerable air quality impacts.

Table 4-1 Maximum Daily Construction Emissions – Proposed Project Compared to Project Evaluated in the 2014 Revised FEIR

Pollutant	Proposed Project (450 Rooms) (*lb/day*)		Project Evaluated in 2014 Revised FEIR (175 Rooms) (*lb/day*)	
	Maximum Daily Rate	Threshold	Maximum Daily Rate	Threshold
Carbon Monoxide (CO)	76	550	32	550
Oxides of Nitrogen (NO_X)	123	250	54	250
Particulate Matter (PM_{10})	35	100	12	100
Particulate Matter ($PM_{2.5}$)	19	67	3.2	55
Oxides of Sulfur[1] (SO_X)	0.2	250	0.1	250
Reactive Organic Gases (ROG)	31	137	47	137

1 shown as sulfur dioxide (SO_2)
Notes: lb/day = pounds per day; tons/yr = tons per year
Sources: San Diego APCD Rule 20.2, 2016; Table 9.2.7.2a of Revisions to Draft EIR; emissions modeling by Ascent Environmental, 2020

Table 4-2 Maximum Daily Operational Emissions – Proposed Project Compared to Project Evaluated in 2014 Revised FEIR

Pollutant	Proposed Project (*lb/day*)		Project Evaluated in 2014 Revised FEIR (*lb/day*)	
	Maximum Daily Rate	Threshold	Maximum Daily Rate	Threshold
Carbon Monoxide (CO)	72	550	140	550
Oxides of Nitrogen (NO_X)	27	250	41	250
Particulate Matter (PM_{10})	15	100	8.5	100
Particulate Matter ($PM_{2.5}$)	4.4	67	2.4	55
Oxides of Sulfur[1] (SO_X)	0.2	250	0.3	250
Reactive Organic Gases (ROG)	24	137	34	137

1 shown as sulfur dioxide (SO_2)
Notes: lb/day = pounds per day; tons/yr = tons per year
Sources: San Diego APCD Rule 20.2, 2016; Table 9.2.7.3 of Revisions to Draft EIR; emissions modeling by Ascent Environmental, 2020

c) Expose sensitive receptors to substantial pollutant concentrations?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to exposure of sensitive receptors to substantial pollutant concentrations because the project would include fewer hotel rooms, fewer vehicle trips, implement significantly more efficient building standards as required by updates to the California Energy Code (Title 24), and reduced overall construction activity when compared to the project evaluated in the 2014 Revised FEIR. In addition, the proposed project would include the same design features related to construction, building sustainability, and transportation.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to exposure of sensitive receptors to substantial pollutant concentrations. The relatively stricter regulations and technology improvements related to construction equipment and vehicles and changes to the State building code resulting in more efficient consumption of electricity, natural gas, gasoline, and diesel would not result in new significant effects because these changes would result in lower air pollutant emissions when compared to the project evaluated in the 2014 Revised FEIR. There are no new sensitive receptors in the project vicinity (e.g., residences, schools, child care facilities, hospitals, or other locations with children, elderly, asthmatics or others with heightened risk of negative health outcomes due to air pollution exposure) since 2014 Revised FEIR certification that would be exposed to air pollutant emissions associated with construction and operation of the proposed project.

The 2014 Revised FEIR did not identify significant effects related to exposure of sensitive receptors to substantial pollutant concentrations and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant air quality impacts related to sensitive receptor exposure.

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

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to emissions such as those leading to odors adversely affecting a substantial number of people because the project does not include any major odor-generating sources or activities. The proposed project would also include significantly more efficient building standards as required by the 2019 California Energy Code and equivalent or more efficient design features related to construction, building sustainability, and transportation that would further result in lower air pollutant emissions relative to the project evaluated in the 2014 Revised FEIR.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to emissions such as those leading to odors adversely affecting a substantial number of people. The relatively stricter regulations and technology improvements related to construction equipment and vehicles would not result in new significant odor effects because these changes would minimize construction-vehicle idling times and would reduce potential temporary odor generation during construction activities. There are no changes to the project that would change the types of odors associated with proposed project construction and operation The land uses and existing conditions described in Section 2.2, Project Location, have not changed since 2014 Revised FEIR certification, including the Sunroad Marina to the east, the former Lockheed Martin Marine Terminal Facilities site and open water in the East Basin to the north, the Sheraton San Diego Hotel and Marina located across Harbor Island Drive to the west, and North San Diego Bay across East Harbor Island Drive to the south.

The 2014 Revised FEIR did not identify significant effects related to exposure of sensitive receptors to emissions such as those leading to odors adversely affecting a substantial number of people and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant air quality impacts related to emissions such as those leading to odors adversely affecting a substantial number of people.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to air quality.

4.4 BIOLOGICAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
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	No	Yes
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	No	Yes
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	No	Yes
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No	Yes
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	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to biological resources, and a summary of changes in circumstances or new information as it relates to biological resources. The impact analysis below includes discussion for each of these checklist questions.

4.4.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR identified potentially significant impacts on nesting birds (BIO-2, page 9.2.2-8) because the removal of mature trees during construction, as well as noise from construction activity, could impede the use of bird

breeding sites on and adjacent to the project site. The 2014 Revised FEIR also identified less-than-significant impacts to eelgrass beds because there would be no shading on existing eelgrass beds based on the proposed height and location of the hotel buildings. The 2014 Revised FEIR also identified less-than-significant impacts to water quality and movement of fish species. Construction runoff and stormwater flow could adversely affect water quality and cause fish to move temporarily outside of the project vicinity but implementation of best management practices (BMPs) and post-construction stormwater controls would avoid significant water quality-related impacts on biological resources in the bay.

The 2014 Revised FEIR included mitigation measures MM BIO-1 (for the 175-room hotel) and MM BIO-2 (for other future hotel development associated with the PMP Amendment), which reduce the impact on nesting birds to less than significant by requiring vegetation removal outside of nesting season or preconstruction surveys for work during nesting season. Note that the text of MM BIO-1 applies to the proposed 175-room hotel and MM BIO-2 applies to a future project applicant for additional hotels but otherwise the text of these two measures is the same.

4.4.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to biological resources, the proposed project would include a taller hotel building (15 stories or approximately 160 feet) than the tallest building proposed in the 2014 Revised FEIR (10 stories). No other changes to the proposed project that relate to biological resources are proposed.

4.4.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

The following changes in circumstances related to biological resources have been identified since the 2014 Revised FEIR was certified. Specifically, a great blue heron (*Ardea herodias*) rookery, which is considered a native wildlife nursery, was observed on the project site during a site visit and additional eelgrass beds were mapped in the northwest corner of Harbor Island East Basin. To help identify whether there have been any changes in circumstances or new information of substantial importance related to biological resources, a site visit of the project site was conducted by a professional biologist on February 27, 2020, to review existing site conditions.

Prior to the site visit, updated database searches of regionally occurring special-status species maintained by the California Department of Fish and Wildlife (CDFW) and California Native Plant Society (CNPS) were conducted. The database searches consisted of reviewing the CDFW's California Natural Diversity Database (CNDDB) (CNDDB 2020) and the CNPS inventory (CNPS 2020) records of previously documented occurrences of special-status species in the Point Loma, La Jolla, La Mesa, National City, and Imperial Beach U.S. Geological Survey 7.5-minute quadrangles. The CNDDB Data Use Guidelines (CDFW 2011) state a 9-quad database search should be performed; however, because the project site is adjacent to San Diego Bay, the database search consisted of only the 5 quads listed above. The database search was conducted primarily for the purpose of identifying any special-status species with the potential to occur in the project site or immediate vicinity that would not have been evaluated in the 2014 Revised FEIR due to a variety of reasons (including a recent change in the listing status of a species, or a newly reported occurrence of a special-status species in the project site or vicinity). Appendix B provides lists of the special-status plants (Table B.1) and special-status wildlife (Table B.2) compiled from the database searches, and describes their regulatory status, habitat, and potential for occurrence in the project site. One special-status plant species and nine special-status wildlife species have the potential to occur in the project site or project vicinity. Seven of these species were not identified in the 2014 Revised FEIR: estuary seablite (Suaeda esteroa), western snowy plover (Charadrius alexandrinus nivosus), green sea turtle (Chelonia mydas), pallid bat (Antrozous pallidus), western mastiff bat (Eumops perotis californicus), western red bat (Lasiurus blossevillii), and western yellow bat (Lasiurus xanthinus). In addition, desktop research, including new eelgrass maps produced in 2017, determined that eelgrass beds are in the northwest corner of Harbor Island East Basin.

No other changes in circumstances or other new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to biological resources have been identified during the preparation of this checklist.

4.4.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to special status species. Construction of a taller building than was evaluated in the 2014 Revised FEIR would result in greater impacts to native bird species due to the increased potential for bird collisions with the building. However, as discussed below, due to the building design features these potential impacts on native birds would be less than significant.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse biological resource impacts.

A biological assessment conducted in 2006 for the 2014 Revised FEIR identified a special-status plant species, estuary seablite, present adjacent to the project site. Five live plants and 3 dead plants were observed (Weston Solutions, Inc. 2006). Estuary seablite grows on the periphery of salt marshes. Because the project site is restricted to the paved parking lot and the Open Space parcel which does not include shoreline, the project would not adversely affect estuary seablite. Green sea turtle is a special-status species identified in the updated CNDDB database (Appendix B) search but is not expected to be adversely affected by the project because green sea turtle would only occur in the open water adjacent to the project site and no in-water work is proposed. Western snowy plover is another special-status species identified in the updated CNDDB database (Appendix B) search but is not expected to be adversely affected by the project. Sandy shore habitat located in the northwest corner of the marina provides foraging habitat for this species; however, this area is located outside of the project site. There is no suitable nesting habitat in or adjacent to the project site. Implementation of BMPs and post-construction stormwater controls as identified in the 2014 Revised FEIR would avoid significant water quality-related impacts on estuary seablite, green sea turtle, and other biological resources, such as fish, in the bay.

Pallid bat, western mastiff bat, western red bat, and western yellow bat were also identified in the updated CNDDB database (Appendix B) search. These special-status bat species and other common bat species could occur in the larger project vicinity, particularly in the riparian areas along the San Diego River (approximately 2.5 miles from the project site) and could forage in the project site, but the species is not expected to roost. Trees on the project site are potential roost habitat for these species, however, preferred roost tree species for pallid bat and western red bat are not present in the project site. Moreover, the western mastiff bat and yellow bat are uncommon species in California. Although western mastiff bat, western red bat, and western yellow bat could use the trees in the project site as temporary or stopover roost habitat for a night, particularly if they are foraging in the vicinity (Stokes, pers comm, 2020), the potential is low and would be limited and highly incidental. Because bats in general are highly sensitive to human disturbance they would likely be precluded from occurring on the project site and surrounding area due to the high levels of human disturbance. In addition, the project site is not within the preferred habitats of these species, and the project site provides limited suitable tree roost habitat. Therefore, because of the extremely low likelihood of occurrence of special-status bat species due to the highly disturbed nature of the project site and surrounding area, the nature of use, if occurring, and the high sensitivity to human disturbance, special status bat species would not be

adversely affected by the project because pallid bat, western mastiff bat, western red bat, western yellow bat, and other common bat species are unlikely to roost long-term in the project site.

The 2014 Revised FEIR identified a potentially significant impact related to substantial adverse effects on native nesting birds and identified mitigation measure BIO-2 to reduce the impact to less than significant. Mitigation measure BIO-2 would require vegetation removal to occur outside of the breeding season, or if performed during breeding season, would require preconstruction nesting surveys and establishment no-disturbance buffers around active nests. The proposed project would be required to implement mitigation measure BIO-2 to reduce its potential impact to less than significant. Mitigation measure BIO-2 would be modified as shown below to also address potential impacts to an active rookery of great blue herons observed on the project site. Impacts to the rookery are discussed further in Section 4.4.1.d., below, because it is a native wildlife nursery. With implementation of Mitigation Measure BIO-2 from the 2014 Revised FEIR, the proposed project would not result in any new or more severe significant impacts related to native nesting birds.

Bird Collisions with Buildings

The proposed project consists of construction of a dual-branded hotel complex with a 12-story extended stay wing and a 15-story, or approximately 160 feet, limited service wing. The proposed project would include an elevator overrun and mechanical enclosures on top of the building that would increase overall height in certain places by 15- to 20-feet (i.e., highest points of building would be 175- to 180 feet). The height of the extended stay wing is comparable to the existing 12-story Sheraton hotel across Harbor Island Drive, but the limited service wing would become the tallest building on Harbor Island. Like the project evaluated in the 2014 Revised FEIR, the proposed project would constitute a notable amount of change in the landscape of the project site and would be a novel element to local wildlife, especially birds, because the paved surface parking lot would be replaced by the proposed hotel development and the existing trees on the undeveloped Open Space parcel would be removed and replaced with new trees and landscaping. However, the proposed project would be taller than the project contemplated on the same parcel in the 2014 Revised FEIR, which was up to 10-stories in height. The following discussion addresses whether the increased height of the proposed project, when considered in tandem with the design of the proposed project and other changes in circumstances, would result in new significant impacts related to bird collisions.

An analysis of the best available bird mortality data for the United States concluded that between 104,000 and 1.6 million birds are killed annually nationwide because of collisions with high-rise buildings (i.e., greater than 11 stories tall) (Loss et al. 2014). The amount of glass in a building, especially untreated glass, is the strongest predictor of the risk of bird collisions (American Bird Conservancy 2015). Under certain conditions, glass on buildings can form a mirror, reflecting sky, clouds, or nearby habitat attractive to birds. Under other conditions, glass may appear transparent or black, which birds may perceive as an unobstructed route (American Bird Conservancy 2015). Bird-friendly building-design strategies include 1) using minimal glass, 2) placing glass behind some type of screening (e.g., netting, screens, grilles, shutters, exterior shades), and 3) using glass with inherent properties that reduce collisions (American Bird Conservancy 2015).

The proposed building design addresses these strategies. While glass windows would be present, no façade of the building would be composed entirely of glass. Alternating glass and solid panels in an approximately 50% to 50% ratio would result in limited continuous glass surfaces. Glass windows would be interspersed with solid panels, which would break up glass reflections and reduce overall transparency. Approximately 96% of the glass surfaces would be low E blueish gray tinted glass with a visible light exterior reflectance value of 25%. The remaining glass would consist of angled glazed panels with a 32% visible exterior light reflectance and with a warmer color coating. The ground level glass would use a low E storefront glazing system.

While most bird collisions occur during the day, some avian species migrate at night, and artificial night lighting on buildings may result in disorientation and potential collisions. Artificial night lighting on a building as a result of project implementation would include lights associated with ambient lighting and LED marquis building signs. Site lighting would be consistent with Lighting Zone standards adopted by the Illuminating Engineering Society and International Dark Sky Association and the City of San Diego outdoor lighting ordinance (Ordinance Number 20186) that requires outdoor light fixtures to limit light pollution through the use of drop cast configuration, shielding, or flat

lenses. The project design includes LZ2 Moderate ambient lighting where lighting is typically used for safety and activity but is not necessarily uniform or continuous. In addition, lighting levels may be extinguished or reduced as activity levels decline. Energy efficient light-emitting diode (LED) lighting would be used throughout the project site, instead of the incandescent, high-pressure sodium and/or fluorescent fixtures proposed in the 2014 Revised FEIR. and the LED lighting would not exceed 3000K. These lighting fixtures shield the light source to minimize glare and light trespass, facilitate better vision at night for birds, and are consistent with recommended American Bird Conservancy light fixtures (2015) that reduce indirect adverse effects to birds.

Light emanating from the inside of the hotel windows would be shaded to a degree by curtains and sunshades, or something similar. Each hotel brand is proposed to have two building signs and each sign would be backlit with additional side shields to minimize light spill and would be consistent with the District's Tenant Signage Guidelines (Unified Port of San Diego 2012).

The design features described would reduce the likelihood of bird collisions with the proposed project; however, bird strikes would likely still occur. Bird species with the greatest risk of collisions with buildings include hummingbirds and other common songbird species (Loss et al. 2014). Special-status bird species are less likely to collide with buildings because of greater visual acuity (peregrine falcon), foraging behavior (i.e., California brown pelican, California least tern, and western snowy plover would not be pursuing songbird flocks), and preferred foraging habitat (i.e., California brown pelican and California least tern forage over open water and western snowy plover forage on sandy beaches and along the edges of marshes and lagoons, not while in flight). While there is potential for common songbird species to be harmed or killed because of collisions with the proposed project, it is unlikely that local songbird populations would drop below self-sustaining levels or that these populations would be eliminated. Therefore, although the proposed project would have a taller maximum building height than the project evaluated in the 2014 Revised FEIR, it would not result in a new significant impact to special status bird species because of bird collisions for the following reasons:

- The design of the proposed project includes features that would reduce the risk of bird strikes, including building design features and nighttime lighting minimization,
- There is low risk of special-status bird species colliding with the proposed project, and

Mortality of common songbirds as a result of building collisions is not expected to eliminate or reduce local songbird populations below self-sustaining levels. The 2014 Revised FEIR did not identify significant impacts on birds related to bird collisions with buildings and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts on special status species related to bird collisions with buildings.

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to shading of eelgrass beds (*Zostera marina*) present adjacent to the project site in the Harbor Island East Basin. Eelgrass habitat is a locally and regionally significant natural community and essential fish habitat under the Magnuson-Stevens Act. The 2014 Revised FEIR explains that development of a 175-room hotel on Area #1 (east of the proposed project site) would result in shading of eelgrass beds immediately north of that site within the East Basin, and concludes this impact is less than significant because the shading of eelgrass beds would be minimal due to the limited time of year (fall/winter) when eelgrass is dormant, and limited time of day (2-3 hours in the afternoon after 3:00 p.m.) that shading would occur.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse eelgrass bed impacts. A 2017 San Diego Bay Eelgrass Inventory identified an isolated patch of eelgrass habitat in the northwest corner of the East Basin and south of Harbor Island (NAVFAC and Port of San Diego 2018).

The 2014 Revised FEIR did not include the northwest corner of the East Basin in the shadow analysis because the buildings it evaluated would not have shaded this section of the basin. Figures 4-5 through 4-7 show that the proposed project would not result in shading of the eelgrass habitat located in the northwest corner of the East Basin or south of Harbor Island. Because the proposed project would not include hotel development on Area #1, it would not result in shading of the eelgrass beds located immediately north of that site. The shadow study conducted in February 2020 is provided in Appendix C. The 2014 Revised FEIR did not identify significant impacts related to shading of eelgrass beds and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to eelgrass habitat.

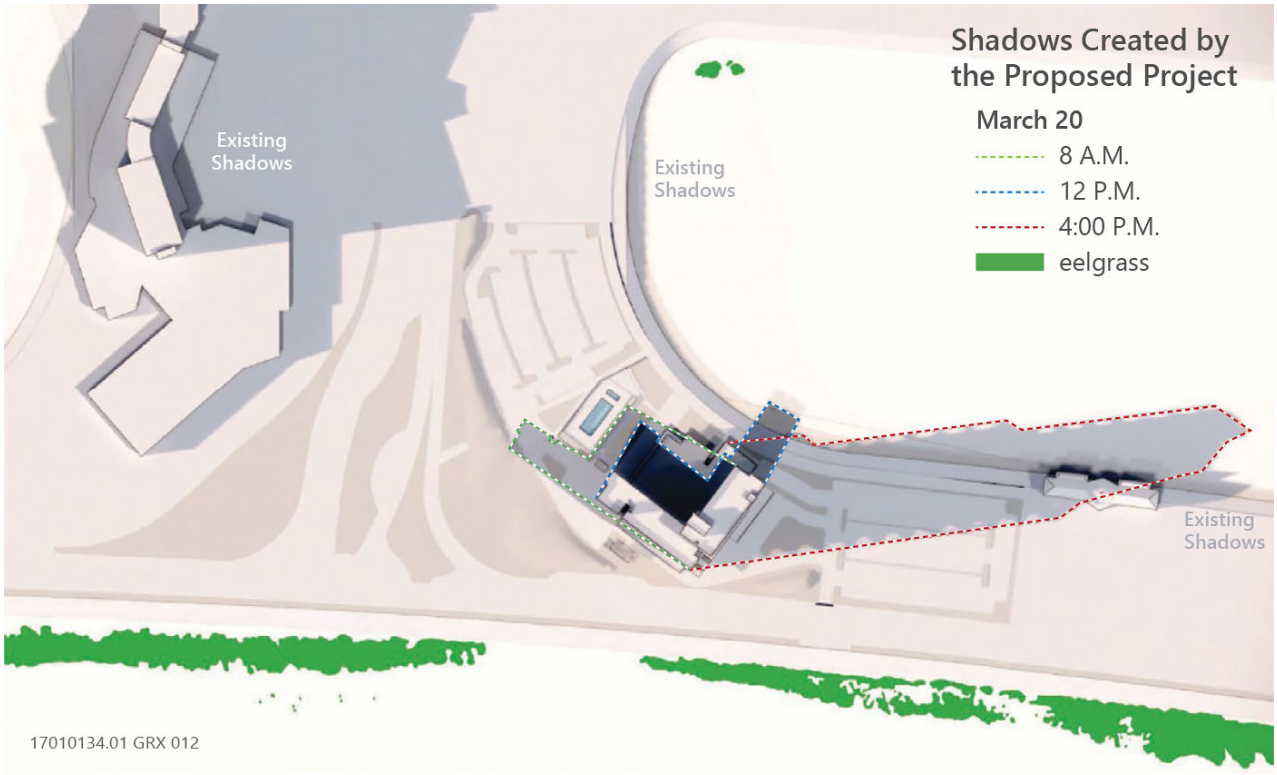

Figure 4-5 Proposed Project Shadows Relative to Eelgrass Beds – March 20

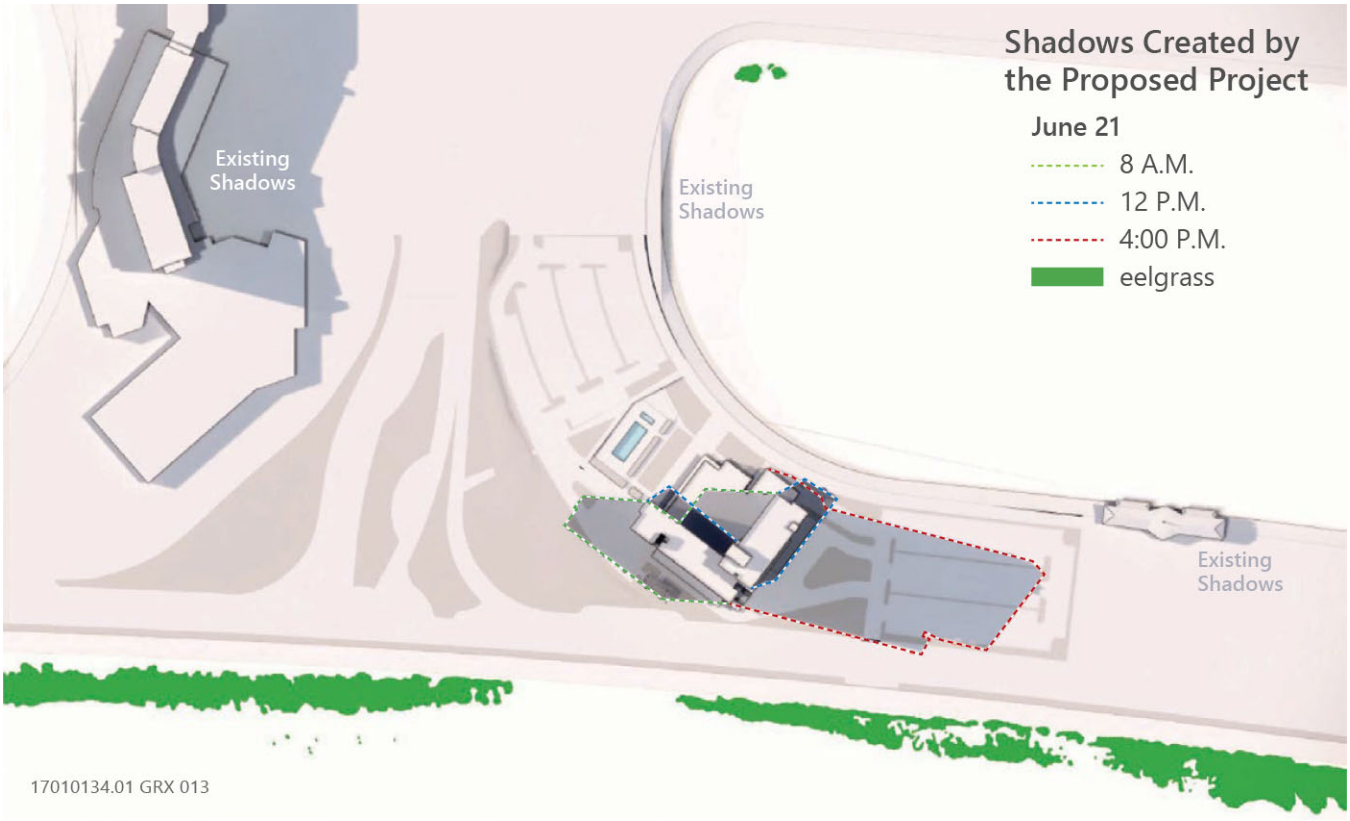

Figure 4-6 Proposed Project Shadows Relative to Eelgrass Beds – June 21

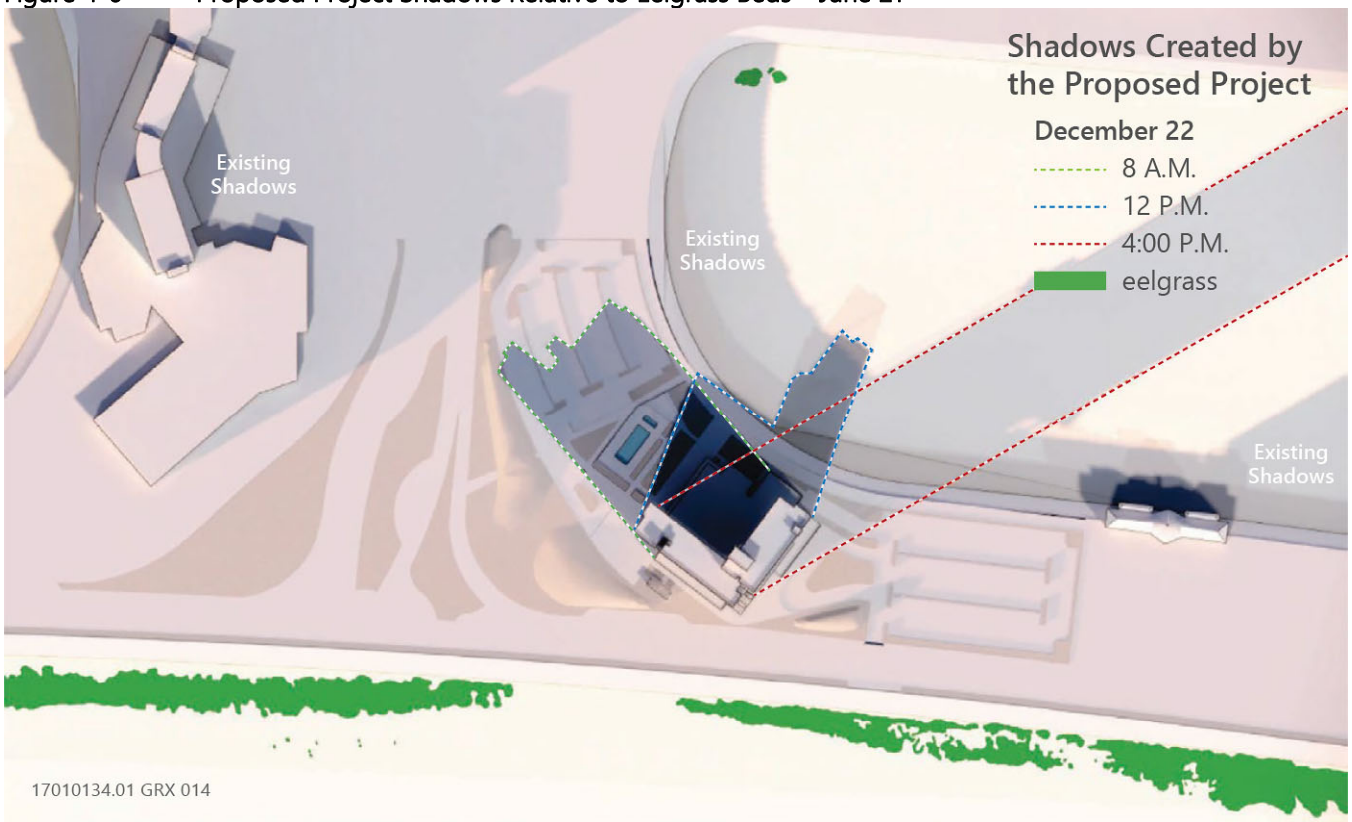

Figure 4-7 Proposed Project Shadows Relative to Eelgrass Beds – December 22

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to state or federally protected wetland habitats because the project site does not contain these habitats. The site visit conducted in February 2020 confirmed no wetland habitats occur on the project site.

The 2014 Revised FEIR did not identify significant impacts related to adverse effects on wetland habitats and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to wetland habitats.

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the use of native wildlife nursery sites because the increase in the height of the building on the project site would not increase the impact to the great blue heron rookery site observed on the project site in February 2020; the impact is associated with the tree removal included in the proposed project and as part of the project evaluated in the 2014 Revised FEIR.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse related to impediment of use of native wildlife nursery sites.

During the site visit conducted in February 2020, great blue heron nesting activity was observed, including great blue herons carrying nesting material to existing nests in a pine tree located in the Open Space parcel on the project site. Eight great blue heron birds were observed on the rookery tree and roughly 4 to 8 existing nests were present in the tree. Construction activities, including removal of trees, could disturb active nests on or near the construction area, potentially resulting in nest abandonment by the adults and mortality of chicks and eggs.

Great blue herons are generally colonial birds that roost and nest in groups, although some great blue herons nest as isolated pairs. The nesting season for great blue herons in San Diego county is slightly longer when compared to other nesting areas in the state and generally runs from early January through September. A majority of San Diego county's 250 to 300 great blue heron nesting pairs are concentrated in the six largest colonies, based on surveys conducted from 1997 to 2001 (Unitt 2012). Great blue herons have weak nest site fidelity and frequently move between colonies. Colonies also often change in size from year to year (Simpson 1984). Based on review of aerial imagery on google earth, it appears that the rookery tree on the project site may have been established in 2016. This rookery tree likely only provides marginal nesting habitat because it is subject to human disturbance due to its proximity to Harbor Island Drive and the airport and is farther away from more productive feeding grounds, such as the San Diego River marshes. Distant feeders have been found to suffer higher nest losses to predators, probably because they leave their nests unattended more often than other locally feeding birds (Simpson 1984). It is unknown how many nests have been successful at the rookery tree on the project site to date.

Thirty colonies were identified in the county during the surveys conducted from 1997 to 2001 and seventeen of these contained between 2 and 54 nests (Unitt 2012). Five of these colonies are roughly within 4 miles of the rookery tree observed on the project site in 2020. Of the five colonies closest to the rookery tree on the project site, four colonies were confirmed to still be active (confirmed nesting activity in 2020) in the same general vicinity (within 0.5 mile of the previously identified colony) based on eBird and iNaturalist observations (eBird 2020, iNaturalist 2020). No updated information regarding the fifth colony identified during the 1997 to 2001 surveys as occurring in the vicinity of the project site rookery could be obtained, possibly because this colony was located on the North Island Naval Air Station and has restricted access to the public, and therefore would limit the number of eBird and iNaturalist observations, which are databases that compile observations posted by the public.

Removal of the rookery tree on the project site would result in great blue herons having to find new nesting sites. Based on the information compiled on known colonies in the area, great blue herons nesting at the rookery tree on the project site would likely move to one of these other colony sites following removal of the rookery tree. Some of these colonies, such as the Sea World/Mission Bay colonies, are located closer to more productive feeding grounds (i.e., San Diego River associated habitats). As noted above, great blue herons have weak nest fidelity and frequently move between colonies. Moreover, per the requirements of mitigation measure BIO-2, tree removal would occur outside of the non-breeding season or, if required during the breeding season, a survey to identify species and appropriate buffers would be implemented to ensure less than significant impacts to great blue herons using the rookery site.

The removal of the rookery tree is not expected to substantially impede the use of a nursery site or impact the species' reproductive success, because the tree would be removed outside of the nesting season, thus not prohibiting/limiting the use of this limited rookery tree during active nesting. Because the existing rookery tree is marginal habitat, there are several other colonies in the general vicinity that the birds could move to, and great blue herons naturally move between colonies, this would be a less-than-significant impact on a native wildlife nursery site.

The 2014 Revised FEIR did not identify significant impacts related to the loss of a native wildlife nursery site and did not identify mitigation measures or specific conditions. However, the 2014 Revised FEIR identified potentially significant impacts related to adverse effects on native bird species protected by CDFW or USFWS and identified mitigation measure BIO-2 to reduce potential impacts to less than significant by requiring vegetation removal to occur during the non-breeding season or requiring preconstruction nesting surveys and establishing no-disturbance buffers around active nests. The proposed project would be required to implement mitigation measure BIO-2 from the 2014 Revised FEIR, which, as modified, would reduce the potential impact of the proposed project on the active great blue heron rookery to less than significant. The modifications to mitigation measure BIO-2 are shown below and would alter the seasonal restrictions of Mitigation Measure BIO-2 to reflect the specific nesting seasons of the great blue heron. With implementation of Mitigation Measure BIO-2, as modified, the proposed project would result in a less than significant impact, same as the project evaluated in the 2014 Revised FEIR. The proposed project would not result in any new or more severe significant impacts related to native nesting birds, including great blue heron.

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to conflicts with local policies or ordinances protecting biological resources or the provisions of an adopted habitat conservation plan. The proposed project is not in conflict with any PMP 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 proposed project falls within the boundary of the San Diego Multiple Species Conservation Program but the City MSCP Subarea Plan does not identify East Harbor Island as being within the Multiple Habitat Planning Area (MHPA). In addition, the District is not subject to the MSCP.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to conflicts with local policies or ordinances protecting biological resources. The project site is located outside of the MHPA and, therefore, would not conflict with the provisions of an adopted habitat conservation plan.

The 2014 Revised FEIR did not identify significant impacts related to conflicts with local policies or ordinances protecting biological resources or the provisions of an adopted habitat conservation plan and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe

significant impacts related to local policies or ordinances protecting biological resources or the provisions of an adopted habitat conservation plan.

Applicable Mitigation Measures from the 2014 Revised FEIR

The applicable mitigation measure from the 2014 Revised FEIR is presented below along with modifications to make it applicable to the proposed project. Note that the text of Mitigation Measure BIO-1 applies to the proposed 175-room hotel and Mitigation Measure BIO-2 applies to a future project applicant for additional hotels but otherwise the text of these two measures is identical so only one is presented below. The measure presented below also includes modifications (shown in strikeout underline format) to make it applicable to the proposed project.

MM BIO-2: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Surveys

To ensure compliance with MBTA and similar provisions under the Fish and Game Code, the Project Applicant or its contractor shall implement one of the following restrictions:

1. Conduct all vegetation removal during the non-breeding season (between ~~September~~ October 1 and December ~~January~~ 31)

OR

2. If construction activities are scheduled between ~~February~~ January 1 and ~~August 31~~ September 30, a qualified ornithologist (with knowledge of the species to be surveyed) shall conduct a focused nesting survey prior to the start of vegetation removal and within any potential nesting habitat (mature trees, eaves on buildings, etc.).

The nesting bird survey area shall include the entire limits of disturbance plus a 300-foot buffer for non-raptors and a 500-foot buffer for ground-nesting raptors. The nesting surveys shall be conducted within 1 week prior to initiation of construction activities and shall consist of a thorough inspection of the Project site by a qualified ornithologist(s). The survey work shall occur between sunrise and 12:00 p.m. when birds are most active. If no active nests are detected during these surveys, no additional mitigation is required.

If the survey confirms nesting within 300 feet of the disturbance footprint for non-raptors or within 500 feet for raptors, a no-disturbance buffer shall be established around each nest site to avoid disturbance or destruction of the nest until after the nesting season or after a qualified ornithologist determines that the young have fledged. The size of the no-disturbance buffer shall be determined by the qualified biologist at the time of discovery. If there is a delay of more than 7 days between when the nesting bird survey is performed and vegetation removal begins, it shall be confirmed that no new nests have been established.

4.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
V. Cultural Resources			
Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	No	No	Yes
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	No	No	Yes
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to cultural resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to cultural resources. The impact analysis below includes discussion for each of these checklist questions.

4.5.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR addressed cultural resources impacts under Section 7.3, Effects Found Not to be Significant. As stated in Section 7.3.2, Cultural Resources, the project site is located on filled land that does not contain subsurface archaeological resources. There are no structures on the proposed project site. No potentially significant cultural resources impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required.

4.5.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project that relate to cultural resources are proposed.

4.5.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

The Lockheed Martin Marine Terminal Building located on the parcel immediately north of the project site is considered a historic resource for the purposes of CEQA (Port of San Diego 2020). However, the information about the Marine Terminal Building that qualifies it as a historic resource under CEQA was known and could have been known at the time the 2014 Revised FEIR was certified. No other changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to cultural resources has been identified during the preparation of this checklist.

4.5.4 Impact Analysis

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) Disturb any human remains, including those interred outside of dedicated cemeteries?

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to discovery of human remains, or historic or archaeological resources. Similarly, no changes in circumstances or new information would require major revisions to the EIR or result in new significant effects related to cultural resources.

The 2014 Revised FEIR did not identify significant impacts related to cultural resources and did not identify mitigation measures or specific conditions. No structures that could be considered historic are located on the project site. Any impacts to cultural resources would be reduced compared to the project evaluated in the 2014 Revised FEIR because the proposed project would result in a smaller area of construction ground disturbance, which is due to the construction of one hotel building instead or two or three hotel buildings across multiple sites, and the proposed project not including infrastructure and roadway alignments within Harbor Island Drive right-of-way. In addition, the project site is located on filled land dredged from San Diego Bay that is not known to contain subsurface archaeological resources or human remains. In the unlikely event that human remains are encountered during construction for the proposed project, as specified by State Health and Safety Code Section 7050.5, no further disturbance would occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, excavation or construction would halt in the area of the discovery, the area would be protected, and consultation and treatment would occur as prescribed by law. If the County Coroner recognizes the remains to be Native American, he or she would contact the Native American Heritage Commission, who would appoint the Most Likely Descendant. If remains are determined to be Native American, a plan would be developed regarding the treatment of human remains and associated burial objects, and the plan would be implemented under the direction of the Most Likely Descendant. Therefore, the proposed project would not result in any new significant impacts related to historical or archaeological resources or human remains.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to cultural resources.

4.6 ENERGY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to energy consumption, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to energy consumption. The impact analysis below includes discussion for each of these checklist questions.

4.6.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant energy impacts and no mitigation measures or specific conditions were required. Energy impacts were addressed in section 4.10 of the 2014 Revised FEIR, "Public Services and Utilities," with energy consumption impacts discussed in Section 4.10.4.9, "Electricity and Natural Gas." Based on the proposed project design features related to construction, energy conservation, water conservation, solid waste, and transportation that would reduce the project's consumption of electricity, natural gas, and gasoline, and result in the 2008 Title 24 energy efficiency standards being exceeded by 15 percent, the 2014 Revised FEIR concluded: "With implementation of these measures the Proposed Project would be conserving energy in accordance with the intent of the Title 24 goal of reducing energy consumption statewide and with the intent of the SDG&E Resource Plan to reduce demand for energy associated with individual projects. As a result, the Proposed Project would not result in the wasteful, inefficient, or unnecessary use of energy."

4.6.2 Changes in the Project

A summary of the changes in the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to energy, the proposed project would involve construction of a single, 450-room hotel, 15 stories high on the westernmost site on East Harbor Island, rather than up to three smaller, 150-to 175-room hotels totaling 500 rooms and located on multiple sites on East Harbor Island (including the proposed project site and the sites immediately east and west of the Sunroad Resort Marina). Regarding trip generation, the proposed project would result in 3,600 ADT, which is 225 fewer ADT than the 3,825 ADT that would result from the project evaluated in the 2014 Revised FEIR. The trip generation estimate for the proposed project is provided in Appendix H.

Regarding construction duration, the proposed project would be built over a 24-month period. This is different than the project evaluated in the 2014 Revised FEIR, which assumed construction of up to three separate hotel buildings would occur during separate, non-overlapping periods of 18 months. The proposed project would involve construction activities up to 8 hours per day five days week, rather than up to 12 hours per day and 6 days per week. The proposed project would not include the construction of off-site roadway and infrastructure realignments within

Harbor Island Drive right-of-way that are described in the 2014 Revised FEIR and would not include demolition of the existing marina locker building.

As with the project evaluated in the 2014 Revised FEIR, energy conservation and sustainability features would be incorporated into the design and construction of the proposed project. These features, as outlined below and evaluated in the 2014 Revised FEIR, were determined to provide energy and water efficiency upgrades resulting in a 15 percent improvement over the 2008 requirements described in California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations; California Energy Code), which are incorporated into the CBC. The CBC has been updated multiple times since the 2008 standards were applicable. The 2019 CBC, and specific requirements applicable to nonresidential and residential construction, are currently effective. The updates to the CBC are relevant because the more recent iterations of the CBC have increased nonresidential building efficiency markedly through demanding energy efficiency measures.

According to the California Energy Commission, nonresidential buildings adhering to the 2019 CBC "will use about 30 percent less energy due mainly to lighting upgrades" than those constructed under the 2016 CBC (i.e., the amount of energy used under 2019 CBC compliance is 70% of the amount used under 2016 CBC compliance) (CEC 2018). Moreover, the 2016 standards required five percent greater efficiency than the 2013 standards (i.e., the amount of energy used under 2016 CBC compliance was 95% of the amount used under 2013 CBC compliance) (CEC 2017), which in turn were 30 percent more efficient than the 2008 standards (i.e., the amount of energy used under 2013 CBC compliance is 70% of the amount used under 2008 CBC compliance) (UC Davis 2014). Because of these changes, nonresidential buildings constructed to 2019 CBC requirements consume 53.5 percent less energy than nonresidential buildings built to 2008 CBC requirements.[2] As a result, by complying with the 2019 CBC the proposed project would be substantially more energy efficient than the project evaluated in the 2014 Revised FEIR, which would have exceeded 2008 CBC energy efficiency standards by 15%.

It should also be noted that updates to the CBC may have made some of the energy conservation and sustainability project design features included in the project evaluated in the 2014 Revised FEIR and identified below inapplicable to the proposed project because 2019 CBC requirements may actually require greater energy efficiency measures. Nevertheless, as a condition of approval, the proposed project would comply with the applicable (currently 2019) energy and water efficiency regulations of the CBC (Title 24, Part 6), and would incorporate the design features related to energy consumption described below if they are more stringent than, and not already included in, the measures that would be implemented to meet the 2019 CBC requirements. The project analyzed in the 2014 Revised FEIR would have exceeded the 2008 energy efficiency standards by 15 percent. Because 2019 CBC requirements are estimated to increase efficiency approximately 53.5% over 2008 CBC standards, the currently proposed project would be more energy efficient than the project evaluated in the 2014 Revised FEIR.

Construction

- Reuse or recycle at least 75% of construction materials (including soil, asphalt, concrete, metal, and lumber).
- 10% of building materials and products that would be used are locally or regionally (within 500 miles) extracted and manufactured, when available.
- Implement Green Building Initiatives, including low VOC emitting finishes, adhesives, and sealants.

Building Sustainability

- Install efficient HVAC system with refrigerant with an Ozone Depletion Potential of zero.
- Install Energy Star, "cool" or light-colored roofing for at least 75% of the roof area, cool pavements, and shade trees.
- Use dual pane low-E windows with a minimum of 0.3 solar heat gain coefficient.

[2] Nonresidential energy use improvement, 2019 CBC relative to 2008 CBC is calculated using the following equation: 70% [2019 vs. 2016] * 95% [2016 vs. 2013] * 70% [2013 vs. 2008] = 46.5%. Because the amount of energy used under 2019 CBC is 46.5% of the amount of energy that would have been used under the 2008 CBC, the 2019 CBC is therefore 53.5% more efficient than the 2008 CBC.

- Install R-value optimized wall and roof insulation. Use better-than-code energy efficient lighting throughout the building and site.
- Utilize filtered and controlled natural ventilation to reduce heating and air conditioning demand by 10%.
- Incorporate engineering design system measures – variable speed chillers, fans, and pumps, boiler and chiller controls; heat recovery; smart auto thermostats; and CO_2 sensors for meeting rooms.
- Use Energy Star appliances for all eligible equipment and fixtures.
- Use solar heating, automatic covers, and efficient pumps and motors for pools and spas.
- Install LEDs for 50% of all the outdoor lighting (except in parking lots, which would use T-5 lighting or equivalent).
- Limit hours of outdoor lighting for 100% of the site lighting by using photocell controls.
- Utilize natural daylight for 75% of the regularly occupied spaces.

Water Conservation and Efficiency

- Install or reuse drought-tolerant landscaping trees and incorporate vines on selected walls to reduce potable water demand for irrigation by at least 50%.
- Use of low flow plumbing features on all fixtures and appliances to reduce potable water use by at least 20%.
- Install water-efficient irrigation systems and devices, including drip irrigation, soil moisture-based irrigation controls, and/or drought tolerant landscaping to reduce potable water use for irrigation by at least 50%.
- Install only low-flow (0.125 gallons per flush) or waterless urinals.
- Install only low-flow toilets (1.28 gallons per flush), faucets (1.0 gallons per minute), and showers (2.0 gallons per minute).
- Install sensor activated lavatory faucets (0.5 gallons per minute) in public restrooms.
- Install moisture sensors that suspend irrigation during unfavorable weather conditions (rain, wind).
- Educate patrons about water conservation using interior and exterior signage.

Transportation

- Limit idling time for commercial vehicles, including deliveries and construction vehicles, to 5 minutes.
- Install bicycle parking facilities.
- Provide a shuttle service to and from the airport. It is estimated that the shuttle would reduce the total number of trips by 7.5% (note this trip reduction estimate is not included in the trip generation analysis performed for the proposed project and described in this checklist in Section 4.17. "Transportation")..

Since certification of the 2014 Revised FEIR, regulations affecting on- and off-road vehicles, construction equipment, and stationary sources have become increasingly stringent. As a result, vehicles and construction equipment operating as part of the proposed project would use energy more efficiently than before. Thus, energy consumption resulting from the operation of construction equipment, mechanical equipment, and motor vehicles as part of the proposed project would have a smaller energy impact than when the 2014 Revised FEIR was certified.

4.6.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to energy consumption have been identified during the preparation of this checklist.

4.6.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to energy consumption or conflicts with state or local plans for renewable energy or energy efficiency because the project would include fewer hotel rooms, fewer vehicle trips, implement significantly more efficient building standards as required by updates to the California Energy Code (Title 24), and reduced construction activity when compared to the project evaluated in the 2014 Revised FEIR and therefore reduced and more efficient consumption of energy. In addition, the proposed project would include equivalent or more efficient design features related to construction, building sustainability, and transportation that would result in more efficient consumption of energy.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to energy consumption or conflicts with state or local plans for renewable energy or energy efficiency. The relatively stricter regulations and technology improvements related to construction equipment and vehicles and changes to the California Energy Code resulting in more efficient consumption of electricity, natural gas, gasoline, and diesel would not result in new significant effects because these changes would result in reduced and more efficient consumption of energy resources when compared to the project evaluated in the 2014 Revised FEIR.

The 2014 Revised FEIR did not identify significant effects related to energy consumption and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to energy consumption or conflicts with state or local plans for renewable energy or energy efficiency.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to energy consumption.

4.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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:	No	No	Yes
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.)	No	No	Yes
ii) Strong seismic ground shaking?	No	No	Yes
iii) Seismic-related ground failure, including liquefaction?	No	No	Yes
iv) Landslides?	No	No	Yes
b) Result in substantial soil erosion or the loss of topsoil?	No	No	Yes
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?	No	No	Yes
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?	No	No	Yes
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	No	Yes
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to geology and soils, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to geology and soils. The impact analysis below includes discussion for each of these checklist questions.

4.7.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR identified two potentially significant impacts on geology and soils that were considered less than significant after mitigation. The first impact is GEO-1 (Revised Final EIR, pages 2-13 to 2-17), which concluded that the proposed structures could suffer significant adverse effects due to groundshaking from seismic events and hazards due to relatively shallow groundwater and liquefiable soils beneath the surface that may create significant adverse effects on proposed structures in a seismic event. The second impact is GEO-2 (Revised Final EIR, pages 2-27 through 2-30), which concluded that future hotel development could be subject to liquefaction and lateral spreading, and foundations and structures could be damaged by ground settlement. Mitigation Measures GEO-1 (Revised Final EIR, pages 6-5 through 6-9) and GEO-2 (Revised Final EIR, pages 6-17 through 6-20) would reduce these potentially significant impacts related to liquefaction and lateral spreading to less than significant. Note that the text of Mitigation Measure GEO-1 applies to the proposed 175-room hotel and Mitigation Measure GEO-2 applies to a future project applicant for additional hotels but otherwise the text of these two measures is the same.

4.7.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to geology and soils, construction of the proposed project would include deep soil mixing (DSM) and foundation support for the taller 15-story tower. The DSM treatment would include the limits of the hotel structure, including the single level meeting area, and extend 15 feet beyond the building footprint. DSM is a ground improvement method that installs a pattern of stiffened elements beneath the building footprint that extend to depths of a dense formational unit and support shallow foundations. The DSM mixes cementitious material with the native soils to harden and stiffen the ground and provides the added benefit of mitigating the potential for liquefaction within the confined cells and provides rigid support that around the perimeter. DSM was not identified as a construction technique for the project evaluated in the 2014 Revised FEIR. Unlike the project evaluated in the 2014 Revised FEIR, the proposed project would not involve pile driving.

Although the estimated magnitude of predicted settlement and lateral spreading was slightly revised by NOVA Services, Inc. (NOVA), the recommendation for ground improvement as a mitigation measure is consistent with the 2014 Revised FEIR and 2006 Geocon Study. The Geocon Study and 2014 Revised FEIR include mitigation measures such as ground improvement by methods such as stone columns or DSM, or by deep foundations, with the preferred method by stone columns. The ground improvement methods are similar in that both install a pattern of stiffened elements beneath the building footprint that extend to depths of a dense formational unit and support shallow foundations. Stone columns create columns of compacted gravel and DSM mixes cementitious material with the native soils to harden and stiffen the ground. DSM provides the added benefit of mitigating the potential for liquefaction within the confined cells and provides rigid support that around the perimeter as opposed to the less rigid stone columns. The rigid perimeter improves mitigation of impacts from lateral spreading and eliminates the need for the previous mitigation of reinforcement along the shoreline. No other changes to the proposed project that relate to geology and soils are proposed.

4.7.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

A geotechnical investigation completed by NOVA in February 2020 (Appendix D) includes subsurface exploration, laboratory testing, engineering analysis and updated recommendations for design and construction. In addition, the CBC has been updated since certification of the 2014 Revised FEIR with the 2019 CBC being the most recent update. Note that updates in geologic maps and literature have renamed the Bay Point Formation to old paralic deposits; however, the engineering properties remain the same and the name change has no effect on project design.

The NOVA subsurface exploration, laboratory testing and engineering analysis identified a potential for soil liquefaction and lateral spreading. The geotechnical field investigation included but was not limited to:

- Five (5) engineering borings to depths of up to 80 feet.
- Completing 13 cone penetration test (CPT) soundings to depths of up to 100 feet. One seismic CPT was included.
- A seismic shear wave survey using the multichannel analysis of surface waves and microtremor array measurements methods.
- Excavation, construction, and testing of two (2) percolation test wells

The explorations resulted in development of geologic stratigraphy and engineering parameters of the geologic units. Ground motions utilizing the updated U.S. Geological Survey (USGS) Unified Hazard Tool resulted in a maximum considered earthquake geometric mean (MCEG) peak ground acceleration of 0.69 g. A Site-Specific Seismic Hazard Analysis was also performed.

Liquefaction-induced ground settlements were estimated to be on the order of 9 inches to 12 inches. Lateral spreading from a seismic event was estimated to be about 3 feet at the crest of the containment dike, diminishing to +1 foot toward the building footprint. Ground improvement by DSM is proposed to eliminate the potential for both liquefaction and lateral spreading beneath the building. The DSM would be extended to approximate elevation -31 feet MSL. The building would be supported by shallow foundations constructed directly over the DSM elements.

Although the magnitude of predicted liquefaction-induced settlement and lateral spreading was slightly revised in the NOVA report, NOVA's recommendation for ground improvement using DSM provides equivalent protection against liquefaction and lateral spreading as the ground improvement techniques included in the 2014 Revised FEIR, which include stone columns or deep foundations. The NOVA report includes updated seismic parameters based on advances in earthquake engineering and the 2019 CBC code updates.

No change in circumstances or new information which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to geology and soils was included in the Geotechnical Report or otherwise identified during preparation of this checklist.

4.7.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the rupture of a known earthquake fault, strong ground shaking, seismic-related ground failure including and lateral spreading, or landslides. The project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death from these geologic hazards. The site has a low potential for rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist and the 2008 City of San Diego Seismic Safety Study. The site is in a seismically active area, as is the majority of southern

California, and has a high potential for strong ground motion. The project would be designed for the ground motions specified by current codes and USGS Unified Hazard Tool. The MCEG peak ground acceleration is 0.69 g for a nearby earthquake with a moment magnitude (MW) of up to MW = 6.9.

The site is located on hydraulic fill and geologic unit of bay deposits that would be subject to seismic-related ground failure such as liquefaction and lateral spreading. The proposed mitigation measure of DSM would mitigate both potential impacts. The project would not result in landsliding since the surface is level, the geologic units are not susceptible to landsliding and the structure footprint would be supported on DSM elements.

The proposed project change to a taller building of up to 15 stories resulted in higher structural loads than were anticipated at the time of the 2014 Revised FEIR. The 2020 NOVA geotechnical investigation evaluated the loading associated with the taller building and concluded that a pattern of DSM elements would create confined cells of soil that lessen the potential for liquefaction and direct support of structural loads from shallow foundations. This would result in similar impacts to the project evaluated in the 2014 Revised FEIR.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse geology and soils impacts. The proposed project is located on the same project site as the additional 10-story hotel building evaluated in the 2014 Revised FEIR and the subsurface composition of the project site has not changed since certification of the 2014 Revised FEIR. The project site has remained a surface parking lot for the approximately 6 years since certification of the EIR. Based on subsurface and engineering analysis for the 2020 NOVA geotechnical investigation, the design of the proposed project would include a pattern of DSM elements to create confined cells of soil that would minimize the potential for liquefaction and lateral spreading and provide direct support of structural loads from shallow foundations.

The 2014 Revised FEIR identified potentially significant impacts related to potential significant adverse effects due to groundshaking from seismic events and hazards due to relatively shallow groundwater and liquefiable soils that may create significant adverse effects on proposed structures in a seismic event. The proposed project would be required to implement mitigation measure GEO-1 from the 2014 Revised FEIR to reduce potential impacts to less than significant. Mitigation Measure GEO-1 would be modified as shown below to incorporate the DSM method described in the NOVA report and included in the proposed project. As a result, the proposed project would not result in any new or more severe significant impacts related to these geologic hazards.

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?

The changes in the proposed project identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to substantial soil erosion or the loss of topsoil; become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; be located on expansive soil; 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; or directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The proposed project would not result in substantial soil erosion or the loss of topsoil because the site is flat and would be covered with pavement, concrete hardscape and landscaping, same as the project evaluated in the 2014 Revised FEIR. The site is located on hydraulic fill and geologic unit of bay deposits that would be compressible from structural loads from the project and would be subject to seismic-related ground failure such as liquefaction and lateral spreading. The proposed design technique of DSM would minimize the potential for liquefaction. Although the soils within the cells would be compressible if subjected to significant loading, this would not result in adverse effects because the foundation loads would be supported directly by the DSM and there would not be major changes in surface elevation. The project site soils improved with DSM are not susceptible to subsidence or collapse. The project would not result in landsliding because the surface is level and the structure footprint would be supported on DSM elements. The project is not located on expansive soil as defined in the 2019 CBC because the underlying soil predominantly consists of granular soil.

The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The site is underlain by man-made fill soil and bay deposits that do not include a unique paleontological resource or unique geologic feature. Same as the project evaluated in the 2014 Revised FEIR, the proposed project would connect into the existing sewer system in the project area for disposal of wastewater and would not involve septic tanks or alternative wastewater disposal systems.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to geology and soils. Based on subsurface and engineering analysis for the 2020 NOVA geotechnical investigation, the design of the proposed project would include a pattern of DSM elements to create confined cells of soil that would minimize the potential for liquefaction and lateral spreading and provide direct support of structural loads from shallow foundations.

The EIR identified potentially significant impacts related to potential significant adverse effects due to groundshaking from seismic events and hazards due to relatively shallow groundwater and liquefiable soils that may create significant adverse effects on proposed structures in a seismic event. The proposed project would be required to implement mitigation measure GEO-2 from the 2014 Revised FEIR to reduce potential impacts to less than significant. Mitigation Measure GEO-2 would be modified as shown below to incorporate the DSM method described in the NOVA report and included in the proposed project. As a result, the proposed project would not result in any new or more severe significant impacts related to these geologic hazards.

Applicable Mitigation Measures from the 2014 Revised FEIR

The applicable mitigation measure from the 2014 Revised FEIR is presented below along with modifications to make it applicable to the proposed project. Note that the text of Mitigation Measure GEO-1 applies to the proposed 175-room hotel and Mitigation Measure GEO-2 applies to a future project applicant for additional hotels but otherwise the text of these two measures is identical so only one is presented below. The measure presented below also includes modifications (shown in strikeout underline format) to make it applicable to the proposed project.

MM GEO-2: To reduce the soil liquefaction and lateral spreading potential beneath the surface of the site, the Project Applicant shall implement all of the measures recommended in the 2020 NOVA Geotechnical Investigation ~~Geocon Study~~ (Appendix D~~H1 of the EIR~~) including the following site design criteria:

I. Except for ~~stone columns and HEAT Anchor~~ ground improvement methods such as deep soil mixing (DSM) or stone columns ~~methods~~, dewatering shall be undertaken for excavations below an elevation of 5 feet above mean sea level (MSL).

II. Ground improvements ~~or deep foundations~~ shall be implemented in conformance with the CBC site design criteria for Type B faults, which include the Rose Canyon Fault zone, as summarized in the following table.

Site Design Criteria

The following seismic design parameters were determined in accordance with ASCE 7-16 Chapter 21 Risk-Targeted Maximum Considered Earthquake (MCE_R) Ground Motion Hazard Analysis. Risk Category IV was assumed for the structure.

Site-Specific *Seismic Design Parameters*

Parameter	Site Class D
Site Latitude, degrees	32.725856
Site Longitude, degrees	-117.195508
Mapped Short Period Spectral Acceleration, S_S	1.47
Mapped One-Second Period Spectral Acceleration, S_1	0.50
Short Period Spectral Acceleration Adjusted For Site Class, S_{MS}	2.27
One-Second Period Spectral Acceleration Adjusted For Site, S_{M1}	1.92
Design Short Period Spectral Acceleration, S_{DS}	1.51
Design One-Second Period Spectral Acceleration, S_{D1}	1.28
Geometric Mean (MCE_G) Peak Ground Acceleration	0.69

~~Parameter~~	~~Ground Deep Improvements~~	~~CBC Foundations~~	~~Reference~~
~~Seismic Zone~~	~~0.40~~	~~0.40~~	~~Table 16-I~~
~~Seismic Profile~~	~~S_D~~	~~S_E~~	~~Table 16-J~~
~~Seismic Coefficient, C_a~~	~~0.57~~	~~0.57~~	~~Table 16-Q~~
~~Seismic Coefficient, C_v~~	~~1.02~~	~~1.87~~	~~Table 16-R~~
~~Near Source Factor, N_a~~	~~1.3~~	~~1.3~~	~~Table 16-S~~
~~Near Source Factor, N_v~~	~~1.6~~	~~1.6~~	~~Table 16-S~~
~~Seismic Source~~	~~B~~	~~B~~	~~Table 16-U~~

Notes:

~~S_D is the soil profile type that contains types of soils that are vulnerable to potential failure or collapse under seismic loading. This soil is often liquefiable.~~

~~O_E is the soil profile type that contains dense granular soil or stiff cohesive soil.~~

~~C_a is the seismic response coefficient for proximity and is defined by sitc conditions such as seismic zone and soil profile type. C_a is determined using Table 16-Q of the CBC.~~

~~C_v is the seismic response coefficierit and is defined by site conditions such as seismic zone and soil profile type. C_v is determined using Table 16-R of the CBC.~~

~~N_a is the near-source factor for C_a and is defined by the seismic source type and the closest distance to a known seismic source. N_a is determined using Table 16-S of the CBC.~~

~~N_v is the near-source factor for C_v and is defined by the seismic source type and the closest distance to a known seismic source. N_v is determined using Table 16-T of the CBC.~~

~~B is the seismic source type between A—faults that produce the largest magnitude events with high rates of seismic activity, and C—faults that are not capable of producing large magnitude events and have low rates of seismic activity. B is determined using Table 16-U of the CBC.~~

A. As recommended in the Geotech Study, ground improvements to mitigate the effects of liquefiable soils and lateral spreading shall be implemented for settlement-sensitive structures (~~such as the~~ use of ~~stone columns or the HEAT~~DSM method). ~~In addition, ground improvements for lateral spreading will be extended at least 5 feet below the mud line of the adjacent San Diego Bay along the existing shoreline, and for all structures the minimum depth of ground improvements will be as specified by the Geotech Study conducted by Geocon in Marth 2006.~~

B. The Project-Applicant shall follow recommendations listed in the Geotech Study conducted by ~~Geocon in March 2006~~NOVA in February 2020 for ~~ground densification methods, minimum cone penetration test (CPT) tip resistance, minimum Standard Penetration Test (SPT), the installation of stone columns, and~~ DSM.

C. Following densification of the existing soils, the Project Applicant shall place additional fill material on the site to re-establish existing grades of between approximately 13 to 16 feet above MSL.

III. The Project Applicant shall consult with a geotechnical engineer regarding potential placement of settlement monuments and recommended Grading Specifications. Settlement monuments may only be required if site elevation is significantly raised.

IV. Site preparation shall begin with the removal of all deleterious material and vegetation. The depth of removal should be such that material exposed in cut areas or soil to be used as fill is relatively free of organic matter. Material generated during stripping and/or site demolition shall be exported from the site.

A. The upper 3 feet of soil within areas subjected to ground improvement by DSM ~~densification by stone columns~~ shall be removed, moisture conditioned and recompacted.

B. The Project Applicant shall follow the recommended procedures listed in the Geotech Study with respect to removal of existing fill soil and insertion of new fill. In addition, any imported soils shall have an expansion index of less than ~~50~~10 and a maximum particle dimension of ~~3~~2 inches.

V. The Project Applicant shall follow the recommendations set by in the Geotech Study for the Proposed Project regarding foundations for the structures.

A. A geotechnical engineer shall observe foundation excavations to verify that the exposed soil conditions are consistent with those anticipated and that they have been extended to the appropriate bearing strata.

~~VI. The Project Applicant shall follow the recommendations set in the Geotech Study for the Proposed Project with regard to utilization of ground foundations such as deep foundations, when they shall be required.~~

VII. Where proposed, buildings can be supported by shallow or mat foundations in improved ground~~, or by deep foundations capable of transmitting foundation loads through the hydraulic fill and bay deposits into the Bay Point Formation~~. Such foundation systems include the following:

A. Foundation excavations shall be observed by the geotechnical engineer prior to the placement of reinforcing steel and concrete to verify that the exposed soil conditions are consistent with those anticipated. If unanticipated soil conditions are encountered, foundation modifications may be required.

VIII. The Project Applicant shall follow recommendations listed on the Geotech Study regarding the use of concrete slab-on-grade, including guidelines for crack-control spacing.

IX. In addition to the extensive mitigation measures listed above, the Geotech Study provides detailed recommendations for the appropriate engineering of other Project components including retaining walls, pavement, and drainage. These measures, where applicable to the proposed project, shall also be implemented.

4.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to greenhouse gases (GHGs), and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to greenhouse gases. The impact analysis below includes discussion for each of these checklist questions.

4.8.1 Summary of 2014 Revised FEIR

No potentially significant GHG emissions impacts were identified in the 2014 Revised FEIR with the inclusion of design features in the project. The 2014 Revised FEIR analyzed cumulative impacts of GHG emissions based on the California Office of Planning and Research interim guidance document, *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review* (OPR 2008), including strategies recommended by the California Climate Action Team, which was established under Executive Order S-3-05, to reduce GHG emissions and meet the goals of Assembly Bill (AB) 32. The GHG-reducing measures presented in the 2014 Revised FEIR included exceeding the 2008 Title 24, Part 6 standards by 15%, and the design features listed below. Because it would reduce emissions over business as usual levels, and because it would employ design features that are consistent with the Port's programs and the ARB's Scoping Plan, the 2014 concluded that the cumulative impact of project-generated GHG emissions would be less than significant (Revisions to Draft EIR, page 9.3-40).

The 2014 Revised FEIR also analyzed sea level rise and concluded that the potential impacts of sea level rise by the year 2100 would be significant (Revisions to Draft EIR, page 9.3-43).

4.8.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to GHG emissions, the proposed project would involve construction of a single, 450-room hotel, 15 stories high on the westernmost site on East Harbor Island, rather than up to three smaller, 150-to 175-room hotels totaling 500 rooms and located on multiple sites on East Harbor Island (including the proposed project site and the sites immediately east and west of the Sunroad Resort Marina). Regarding trip generation, the proposed project would result in 3,600 ADT, which is 225 fewer ADT than the 3,825 ADT that would result from the project evaluated in the 2014 Revised FEIR. The trip generation estimate for the proposed project is provided in Appendix H.

Regarding construction duration, the proposed project would be built over a 24-month period. This is different than the project evaluated in the 2014 Revised FEIR, which assumed construction of up to three separate hotel buildings would occur during separate, non-overlapping periods of 18 months. The proposed project would involve

construction activities up to 8 hours per day five days week, rather than up to 12 hours per day and six days per week. The proposed project would not include the construction of off-site roadway and infrastructure realignments within Harbor Island Drive right-of-way that are described in the 2014 Revised FEIR and would not include demolition of the existing marina locker building.

As with the project evaluated in the 2014 Revised FEIR, energy conservation and sustainability features would be incorporated into the design and construction of the proposed project. These features, as outlined below and evaluated in the 2014 Revised FEIR, were determined to provide energy and water efficiency upgrades resulting in a 15 percent improvement over the 2008 requirements described in California's Building Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6 of the California Code of Regulations; California Energy Code), which are incorporated into the CBC.

The CBC has been updated multiple times since the 2008 standards were applicable. The 2019 CBC, and specific requirements applicable to nonresidential and residential construction, are currently effective. The updates to the CBC are relevant because the more recent iterations of the CBC have increased nonresidential building efficiency markedly through demanding energy efficiency measures.

According to the California Energy Commission, nonresidential buildings adhering to the 2019 CBC "will use about 30 percent less energy due mainly to lighting upgrades" than those constructed under the 2016 CBC (i.e., the amount of energy used under 2019 CBC compliance is 70% of the amount used under 2016 CBC compliance) (CEC 2018). Moreover, the 2016 standards required five percent greater efficiency than the 2013 standards (i.e., the amount of energy used under 2016 CBC compliance was 95% of the amount used under 2013 CBC compliance) (CEC 2017), which in turn were 30 percent more efficient than the 2008 standards (i.e., the amount of energy used under 2013 CBC compliance is 70% of the amount used under 2008 CBC compliance) (UC Davis 2014). Because of these changes, nonresidential buildings constructed to 2019 CBC requirements consume 53.5 percent less energy than nonresidential buildings built to 2008 CBC requirements.[3] As a result, by complying with the 2019 CBC the proposed project would be substantially more energy efficient than the project evaluated in the 2014 Revised FEIR, which would have exceeded 2008 CBC energy efficiency standards by 15%.

It should also be noted that updates to the CBC may have made some of the energy conservation and sustainability project design features included in the project evaluated in the 2014 Revised FEIR and identified below inapplicable to the proposed project because 2019 CBC requirements may actually require greater energy efficiency measures. Nevertheless, as a condition of approval, the proposed project would comply with the applicable (currently 2019) energy and water efficiency regulations of the CBC (Title 24, Part 6), and would incorporate the design features related to energy and GHG emissions described below if they are more stringent than, and not already included in, the measures that would be implemented to meet the 2019 CBC requirements. The project analyzed in the 2014 Revised FEIR would have exceeded the 2008 energy efficiency standards by 15 percent. Because 2019 CBC requirements are estimated to increase efficiency approximately 53.5% over 2008 CBC standards, the currently proposed project would be more energy efficient than the project evaluated in the 2014 Revised FEIR.

Construction

- Reuse or recycle at least 75% of construction materials (including soil, asphalt, concrete, metal, and lumber).
- 10% of building materials and products that would be used are locally or regionally (within 500 miles) extracted and manufactured, when available.
- Implement Green Building Initiatives, including low VOC emitting finishes, adhesives, and sealants.

Building Sustainability

- Install efficient HVAC system with refrigerant with an Ozone Depletion Potential of zero.

[3] Nonresidential energy use improvement, 2019 CBC relative to 2008 CBC is calculated using the following equation: 70% [2019 vs. 2016] * 95% [2016 vs. 2013] * 70% [2013 vs. 2008] = 46.5%. Because the amount of energy used under 2019 CBC is 46.5% of the amount of energy that would have been used under the 2008 CBC, the 2019 CBC is therefore 53.5% more efficient than the 2008 CBC.

- Install Energy Star, "cool" or light-colored roofing for at least 75% of the roof area, cool pavements, and shade trees.
- Use dual pane low-E windows with a minimum of 0.3 solar heat gain coefficient.
- Install R-value optimized wall and roof insulation. Use better-than-code energy efficient lighting throughout the building and site.
- Utilize filtered and controlled natural ventilation to reduce heating and air conditioning demand by 10%.
- Incorporate engineering design system measures – variable speed chillers, fans, and pumps, boiler and chiller controls; heat recovery; smart auto thermostats; and CO_2 sensors for meeting rooms.
- Use Energy Star appliances for all eligible equipment and fixtures.
- Use solar heating, automatic covers, and efficient pumps and motors for pools and spas.
- Install light emitting diodes (LEDs) for 50% of all the outdoor lighting (except in parking lots, which would use T-5 lighting or equivalent).
- Limit hours of outdoor lighting for 100% of the site lighting by using photocell controls.
- Utilize natural daylight for 75% of the regularly occupied spaces.

Water Conservation and Efficiency

- Install or reuse drought-tolerant landscaping trees and incorporate vines on selected walls to reduce potable water demand for irrigation by at least 50%.
- Use of low flow plumbing features on all fixtures and appliances to reduce potable water use by at least 20%.
- Install water-efficient irrigation systems and devices, including drip irrigation, soil moisture-based irrigation controls, and/or drought tolerant landscaping to reduce potable water use for irrigation by at least 50%.
- Install only low-flow (0.125 gallons per flush) or waterless urinals.
- Install only low-flow toilets (1.28 gallons per flush), faucets (1.0 gallons per minute), and showers (2.0 gallons per minute).
- Install sensor activated lavatory faucets (0.5 gallons per minute) in public restrooms.
- Install moisture sensors that suspend irrigation during unfavorable weather conditions (rain, wind).
- Educate patrons about water conservation using interior and exterior signage.

Solid Waste

- Provide interior and exterior storage areas for recyclables and green waste and provide adequate recycling containers on-site.
- Provide education and publicity about recycling and reducing waste using signage and a case study.

Transportation

- Limit idling time for commercial vehicles, including deliveries and construction vehicles, to 5 minutes.
- Install bicycle parking facilities.
- Provide a shuttle service to and from the airport. It is estimated that the shuttle would reduce the total number of trips by 7.5% (note this trip reduction estimate is not included in the trip generation analysis performed for the proposed project and described in this checklist in Section 4.17. "Transportation")..

Since certification of the 2014 Revised FEIR, air quality and GHG regulations affecting on- and off-road vehicles, construction equipment, and stationary sources have become increasingly stringent, and include lower emissions limits and cleaner engine requirements. As a result, vehicles and construction equipment operating as part of the proposed project would generate less GHG emissions than before. Thus, operation of construction equipment,

mechanical equipment, and motor vehicles as part of the proposed project would result in fewer GHG emissions relative to the requirements in place when the 2014 Revised FEIR was certified.

No other changes to the proposed project that relate to GHG emissions are proposed.

4.8.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to GHG emissions have been identified during the preparation of this checklist.

4.8.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to GHG emissions or conflicts with an applicable adopted GHG reduction plan, policy, or regulation because the project would include fewer hotel rooms, fewer vehicle trips, and reduced construction activity and therefore lower GHG emissions when compared to the project evaluated in the 2014 Revised FEIR. The proposed project would include the same design features related to construction, building sustainability, and transportation.

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to GHG emissions or conflicts with an applicable adopted GHG reduction plan, policy, or regulation. The relatively stricter regulations and technology improvements related to construction equipment and vehicles and changes to the State building code resulting in more efficient consumption of electricity, natural gas, gasoline, and diesel would not result in new significant effects because these changes would result in reduced GHG emissions when compared to the project evaluated in the 2014 Revised FEIR.

The 2014 Revised FEIR did not identify significant effects related to GHG emissions and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to GHG emissions or conflicts with an applicable adopted GHG reduction plan, policy, or regulation.

The 2014 Revised FEIR did identify potentially significant impacts related to sea level rise by the year 2100 and identified MM SLR-1 requiring site-specific analysis and adaptive strategies such as the use of perimeter floodwalls or other flood barriers around either the outer margins of Harbor Island or the proposed development that would reduce the impact to less than significant. There are no changes to the project or circumstances under which it is being undertaken that would result in a new significant sea level rise impact or a substantial increase in the severity of the impact identified in the 2014 Revised FEIR. The proposed project is located on one of the parcels evaluated in the 2014 Revised FEIR and does not include any changes in its design or operation that are relevant to its sea level rise exposure. The proposed project would be required to implement mitigation measure SLR-C1 from the 2014 Revised FEIR and would not result in any new or more severe significant impacts related to sea level rise.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures from the 2014 Revised FEIR identified to reduce impacts related to GHG emissions. As described above, the proposed project would include equivalent or more stringent design features related to

construction, building sustainability, and transportation relative to the project evaluated in the 2014 Revised FEIR. The following mitigation measure from the 2014 Revised FEIR regarding sea level rise impacts, as modified, is applicable to the proposed project.

MM SLR-C1:

Prior to the approval of a Coastal Development Permit for the proposed project ~~hotel development that could occur under the proposed PMP Amendment~~, the project applicant shall retain a qualified engineer who shall prepare for the Port District's review and approval an up-to-date, site specific analysis of the potential impacts of sea level rise by the year 2100 on the proposed hotel development. The report shall determine whether adaptive strategies for accommodating the potential for sea level rise and the potential for more frequent wave overtopping and wave-induced impact forces are necessary and, if so, shall recommend appropriate adaptive strategies such as the use of perimeter floodwalls or other flood barriers around either the outer margins of Harbor Island or the proposed development to be incorporated into the design of the proposed development.

4.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
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?	No	No	Yes
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No	No	Yes
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?	No	No	Yes
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?	No	No	Yes
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No	Yes
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to hazards and hazardous materials, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to hazards and hazardous materials. The impact analysis below includes discussion for each of these checklist questions.

4.9.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR identified a potentially significant impact related to an underground storage tank that was removed from the site located immediately west of the Sunroad Resort Marina (which is not included in the proposed project). A Phase II investigation to determine if the removed underground storage tank (UST) contaminated the soil was completed and indicated that the site did not contain toxic contaminants, such as petroleum hydrocarbons and volatile organic compounds. However, the Revisions to Draft EIR, concluded that it cannot be assumed that the number and location of samples collected during the Phase II investigation are representative of the entire project site, the potential exists that areas within the PMP Amendment area (which included the proposed project site) could occur may be contaminated due to leaks from the removed UST. Due to potential worker exposure to hazardous materials associated with the removed UST, this impact was considered potentially significant. Mitigation Measures HZ-1a, HZ-1b, HZ-2a, and HZ-2b, Section 9.2.4.2.4 of Revisions to Draft EIR, would reduce impacts to a less-than-significant level through preparation of a contingency plan and Site Safety Plan, respectively, which would provide procedures to be followed in case contaminated soil is encountered. Note that the text of Mitigation Measures HZ-1a and HZ-1b apply to the proposed 175-room hotel and Mitigation Measures HZ-2a and HZ-2b apply to a future project applicant for additional hotels but otherwise the text of HZ-1a and HZ-1b is identical to HZ-2a and HZ-2b.

Impacts related to the routine transport, use, storage, or disposal of hazardous materials during construction and operation were determined to be less than significant due to compliance with federal, state, and local health and safety regulations, in combination with construction BMPs implemented from a stormwater pollution prevention plan (SWPPP) (Section 9.2.4.2.1 of Revisions to Draft EIR). The 2014 Revised FEIR determined that compliance with federal, state, and local regulations, in combination with construction BMPs implemented from a SWPPP, as well as construction crew training, would ensure that all hazardous materials are used, stored, and disposed properly and would reduce the likelihood and minimize the consequences of a release during construction activities to a level less than significant (Section 9.2.4.2.2 of Revisions to Draft EIR). No impacts with respect to hazardous materials near a school were identified because the project site is not located with 0.25 mile of a school (Section 9.2.4.2.3 of Revisions to Draft EIR).

The project is located within SDIA's Airport Influence Area. As discussed in Section 9.2.4.2.5 of Revisions to Draft EIR, the proposed project is subject to the Federal Aviation Administration (FAA) review pursuant to FAR Part 77 and was determined to be consistent with the airport land use compatibility plan (ALUCP). The 2014 Revised FEIR states that the project is not located near a private airstrip, and thus would not result in hazards associated with aircraft from private airstrips (Section 9.2.4.2.6 of Revisions to Draft EIR). Because the Project would not impede emergency access to and from the Project site, the 2014 Revised FEIR determined that it would not affect emergency plans (Section 9.2.4.2.7 of Revisions to Draft EIR). Because the project site is in an urbanized area surrounded by water and is not designated as a fire hazard zone, the 2014 Revised FEIR states that there would be no impacts involving wildland fires (Section 9.2.4.2.8 of Revisions to Draft EIR).

4.9.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to hazards and hazardous materials, the proposed project would be located on the westernmost site on East Harbor Island and would include the sites located immediately east and west of the Sunroad Resort Marina site. The proposed project would not include the infrastructure and roadway alignments within Harbor Island Drive right-of-way that were described in the 2014 Revised FEIR.

The proposed project would also result in a taller building on the project site relative to the project evaluated in the 2014 Revised FEIR. The proposed project would include 450 hotel rooms within a single building up to 15-stories tall (160 feet maximum height above ground level with mechanical enclosures and elevator overruns up to a maximum height of 180 feet above ground level) on the westernmost site on East Harbor Island instead of the 500 rooms distributed across two or three new hotel buildings evaluated in the 2014 Revised FEIR. With respect to the proposed project site, the 2014 Revised FEIR evaluates two scenarios: one in which 325 hotel rooms are developed within a

single 10-story building, and a second in which 325 hotel rooms are developed within two 4-story buildings: one on the project site and the other on the parcel immediately east of the proposed project site.

A 175-room hotel (65 feet maximum height above ground level with architectural details and fenestrations up to a maximum height of 75 feet above ground level would not be constructed on the parcel immediately east of the Sunroad Resort Marina as part of the proposed project. In addition, the proposed project would use shimmering accent glass that mimics ocean sun reflections on approximately 2% of the overall building facade and LED technology for outdoor lighting.

No other changes to the proposed project that relate to hazards and hazardous materials are proposed.

4.9.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

A Phase I Environmental Site Assessment (ESA) completed for the proposed project site in June 2020 (Appendix E) did not identify any recognized environmental conditions on the project site.

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to hazards and hazardous materials have been identified in the Phase I ESA or otherwise identified during preparation of this checklist.

4.9.4 Impact Analysis

Would the project:

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

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to routine transport, use, or disposal of hazardous materials because the project would not include changes in construction or operations that would not meaningfully change the routine transport, use, or disposal of hazardous materials associated with the project. Similarly, there are no changes in circumstances identified above that would require major revisions to the EIR or result in new significant effects related to hazards and hazardous materials because there has been no change in the use of the project site or in the potential for environmental contaminants to be present in the hydraulically-dredged fill material underlying the project site since 2014 Revised FEIR certification.

The 2014 Revised FEIR did not identify significant impacts related to routine transport, use, or disposal of hazardous materials and did not identify mitigation measures or specific conditions. The types of hazardous materials that could be released during construction and operation of the proposed project are similar to those associated with construction and operation of the project described in the 2014 Revised FEIR and include gasoline spills, oil spills, other vehicle-related fluids, paints, solvents, and metals. Compliance with federal, state, and local regulations, including construction BMPs implemented from a SWPPP, as well as construction crew training, would ensure that all hazardous materials are transported, used, stored, and disposed of properly and would reduce the likelihood and minimize the consequences of a release and significant hazard to the public during construction activities. Therefore, the proposed project would not result in any new significant impacts related to 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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to accidental release of hazardous materials into the environment because the project would not include changes in construction or operations that would not meaningfully increase the likelihood of reasonably foreseeable upset or accident conditions. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to adverse hazards and hazardous materials impacts because there has been no change in the use of the project site or in the potential for environmental contaminants to be present in the hydraulically-dredged fill material underlying the project site since 2014 Revised FEIR certification.

The 2014 Revised FEIR did not identify significant impacts related to reasonably foreseeable upset and/or accidental conditions involving the release of hazardous materials into the environment and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to 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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to adverse hazards and hazardous materials impacts. This is because the project site is not located within one-quarter mile of an existing or proposed school.

The 2014 Revised FEIR did not identify significant impacts related to hazardous emissions, substances, or waste within one-quarter mile of an existing or proposed school and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to these hazards and hazardous materials impacts because the project site is not located 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 §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to location on a site included on a list of hazardous materials sites compiled pursuant to 65962.5. This is because the proposed project would not include the site located immediately west of the Sunroad Resort Marina, which according to the 2014 Revised FEIR, did not contain toxic contaminants as the result of a removed UST. Nevertheless, the 2014 Revised FEIR concluded that the potential exists that areas within the PMP Amendment area (which included the proposed project site) may be contaminated due to leaks from the removed UST, and the construction workers could potentially be exposed to toxic contaminants as a result. There are no changes to project that would increase the potential level of worker exposure during construction, and the level of such exposure would likely be less because the proposed project would not include the site of the removed UST.

There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to adverse hazards and hazardous materials impacts because the project site is not located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, as determined by the Phase I ESA prepared for the proposed project (Appendix E). Moreover, there has been no change in the use of the project site or in the potential for environmental contaminants to be present in the hydraulically dredged fill material underlying the project site since 2014 Revised FEIR certification.

Mitigation Measures HZ-1a and HZ-1b (for the 175-room hotel) and HZ-2a and HZ-2b (for future hotel development under the PMP Amendment), Section 9.2.4.2.4 of Revisions to Draft EIR, would reduce impacts to a less-than-significant level through preparation of a contingency plan and Site Safety Plan, respectively, which would provide procedures to be followed in case contaminated soil is encountered. Note that the text of Mitigation Measures HZ-1a and 1b applied to the proposed 175-room hotel and Mitigation Measures HZ-2a and 2b applied to a future project applicant for additional hotels but otherwise the text of these two sets of measures is identical. Only Mitigation Measures HZ-2a and 2b would apply to the proposed project.

The 2014 Revised FEIR identified potentially significant impacts related to the potential for exposure of construction workers to hazards a result of the database listing and potential for contamination from a removed UST on the site immediately west of the Sunroad Resort Marina, and identified Mitigation Measures HZ-1a and HZ-1b (for the 175-room hotel) and HZ-2a and HZ-2b (for future hotel development under the PMP Amendment) to reduce potential impacts to less than significant by requiring the preparation and District approval of a contingency plan and Site Safety Plan prior to start of construction identifying appropriate health and safety procedures that would be implemented during construction to reduce potential health and safety hazards to workers and the public. The proposed project would be required to implement mitigation measures HZ-2a and HZ-2b from the 2014 Revised FEIR and would not result in any new or more severe significant impacts related to hazards and hazardous materials. Note that the text of Mitigation Measures HZ-1a and 1b applied to the proposed 175-room hotel and Mitigation Measures HZ-2a and 2b applied to a future project applicant for additional hotels but otherwise the text of these two sets of measures is identical

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to conflicts with an airport land use plan because the increases in the maximum building height of the proposed project associated with elevator overruns and mechanical enclosures on the roof would not result in aircraft safety hazards. The proposed project site is located within the Airport Influence Area within Review Area 2 of the ALUCP (San Diego County Regional Airport Authority 2014). The San Diego County Regional Airport Authority, as the Airport Land Use Commission (ALUC), has determined that the proposed project does not require review by the ALUC because it is outside of Review Area 1, but does require review by the FAA (Gowens, pers. comm., 2020). FAA has conducted an aeronautical study of the proposed project, including the height of the proposed structures and construction equipment including cranes, and determined that construction and operation of the project would not exceed obstruction standards and therefore would not be a hazard to air navigation (Appendix F). With respect to the changes to the project's building materials, the proposed shimmering accent glass would be directed away from San Diego International Airport (SDIA).

There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to aircraft safety hazards or excessive noise for people residing or working in the project area. The project site's proximity to SDIA and Naval Air Station North Island on Coronado and level of exposure to associated aircraft noise from these airports has not changed since certification of the 2014 Revised FEIR.

The 2014 Revised FEIR did not identify significant impacts related to aircraft safety hazards or excessive noise within an airport land use plan and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to aircraft safety hazards or excessive noise within an airport land use plan.

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

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to emergency response or emergency evaluation plans. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to impairment of or interference with emergency response or emergency evaluation plans.

The 2014 Revised FEIR did not identify significant impacts related to impaired implementation of or physical interference with emergency response or emergency evaluation plans and did not identify mitigation measures or specific conditions. The proposed project would be required to comply with applicable requirements set forth by the County of San Diego Office of Emergency Services (OES) Operational Area Emergency Plan, San Diego Harbor Police Department, City of San Diego Police Department, and City of San Diego Fire Department. OES coordinates emergency response at the local level in the event of a disaster, including fires. This emergency response coordination is facilitated by the Operational Area Emergency Operations Center and responding agencies to the proposed project site: the City of San Diego Police and Fire Departments and San Diego Harbor Police Department. Same as the project evaluated in the 2014 Revised FEIR, the proposed project would be reviewed approved by the City of San Diego Development Services Department Fire Plan Review Section, which may require features such as fire lanes, fire hydrants, and/or fire access plans to ensure that the proposed project would not impede emergency access for the project site. The proposed project would not result in any physical changes to access in the surrounding area, or otherwise impair implementation of emergency response or evacuation plans. Therefore, the proposed project would not result in a new significant impact related to emergency response or evacuation.

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

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to wildland fire. Similarly, the changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects related to wildland fires.

The 2014 Revised FEIR did not identify significant impacts related to wildland fire and did not identify mitigation measures or specific conditions. The project site is located on San Diego Bay, near downtown San Diego, and is covered with impermeable surfaces. The California Department of Forestry and Fire Protection has designated the project site as a non-very high fire hazard severity zone (CAL FIRE 2009). The proposed project would not result in any new significant impacts related to wildland fires.

Applicable Mitigation Measures from the 2014 Revised FEIR

The applicable mitigation measures from the 2014 Revised FEIR are presented below along with modifications to make them applicable to the proposed project. Note that the text of Mitigation Measures HZ-1a and 1b applied to the proposed 175-room hotel and Mitigation Measure HZ-2a and 2b applied to a future project applicant for additional hotels but otherwise the text of these two sets of measures is identical so only one is presented below.

Mitigation Measure HZ-2a

Prior to the initiation of construction activities, the Project Applicant shall prepare and submit to the Port District's Environmental Services Department for approval, a contingency plan outlining the procedures to be followed by the Project Applicant and/or contractor in the event that undocumented areas of contamination are encountered during construction activities. The contingency plan shall provide, at a minimum, that in the event undocumented areas of contamination are discovered during construction activities, the Project Applicant and/or its contractor shall discontinue construction activities in the area of suspected contamination and shall notify the Port District forthwith, and, in consultation with the County of San Diego Department of Environmental Health's Hazardous Materials Division and subject to the review and approval of the Port District and any other public agency with jurisdiction over the contamination encountered, the Project Applicant shall prepare a plan for abatement and remediation of the contamination. Construction activities shall be discontinued until the Project Applicant and/or contractor has

implemented all appropriate health and safety procedures required by the Port District and any other agency with jurisdiction over the contamination encountered.

Mitigation Measure HZ-2b

Prior to the initiation of construction activities, the Project Applicant shall prepare a Site Safety Plan to address possible hazardous materials present within the Project Site associated with the UST that was removed , the marina and past use of the surrounding areas for industrial purposes including aerospace and other industries. The Site Safety Plan shall be subject to Port of San Diego approval, and, if deemed appropriate, the Project Applicant shall, in consultation with the County of San Diego Department of Environmental Health, be prepared to address hazardous construction-related activities within the boundaries of the project site to reduce potential health and safety hazards to workers and the public.

4.10 HYDROLOGY AND WATER QUALITY

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No	No	Yes
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:	No	No	Yes
i) Result in substantial on- or offsite erosion or siltation;	No	No	Yes
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	No	No	Yes
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	No	No	Yes
iv) Impede or redirect flood flows?	No	No	Yes
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No	Yes
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to hydrology and water quality, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to hydrology and water quality. The impact analysis below includes discussion for each of these checklist questions.

4.10.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant impacts to hydrology and water quality. The 2014 Revised FEIR states that the project applicant 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), which would result in less-than-significant impacts related to water quality standards (Section 9.2.5.2.1 of Revisions to Draft EIR) and result in less-than-significant impacts related to polluted runoff (Section 9.2.5.2.4 of Revisions to Draft EIR) or degraded water quality (Section 9.2.5.2.1.5 of Revisions to Draft EIR). The project evaluated in the 2014 Revised FEIR included the installation of new surface parking areas and walkways but would not substantially alter stormwater flows or drainage patterns on the project site (Section 9.2.5.2.3 of Revisions to Draft EIR). The project would have no impact on groundwater supplies (Section 9.2.5.2.2 of Revisions to Draft EIR). No structures were proposed within the 100-year flood hazard area, and associated impacts would be less than significant (Section 9.2.5.2.1.6, 9.2.5.2.1.7, 9.2.5.2.1.8, 9.2.5.2.1.9 of Revisions to Draft EIR). Because the project site is within a protected bay, there would be no substantial risk of seiche, tsunami, or mudflow (Section 4.5.4.9 of the Draft EIR).

4.10.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. The amount of construction ground disturbance under the proposed project would be lower because it would include construction of a single hotel building on the westernmost site on East Harbor Island instead of the 2-3 hotel buildings across multiple sites evaluated in the 2014 Revised FEIR. In addition, the proposed project would include permanent water quality design features such as biofiltration vaults and labeling of drainage inlets to discourage dumping. The proposed project would not include construction of the infrastructure and roadway alignments within Harbor Island Drive right-of-way that were described in the 2014 Revised FEIR. No other changes to the proposed project that relate to water quality and hydrologic resources are proposed.

4.10.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to hydrology and water quality have been identified during the preparation of this checklist.

4.10.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse hydrology and water quality impacts. Similarly, there are no changes in circumstances or new information that would require major revisions to the EIR or result in new significant effects related to hydrology and water quality impacts.

Impacts to surface water quality in the Bay would be reduced compared to the project evaluated in the 2014 Revised FEIR because the proposed project would result in a smaller area of construction ground disturbance, which is due to the construction of one hotel building instead or two or three hotel across multiple sites, and the proposed project not including infrastructure and roadway alignments within Harbor Island Drive right-of-way. The proposed project would also avoid significant impacts to water quality standards by including new permanent water quality design features such as biofiltration vaults, labeling of drainage inlets to discourage dumping, and would connect to the existing stormwater drainage system. The proposed project would not substantially increase the impermeable surface area on the project site so it would not substantially change existing drainage patterns of the site or interfere with the existing level of groundwater recharge; the proposed project would include less impermeable surfaces than the existing condition due to proposed landscaping and other permeable surface area on the existing asphalt surface parking lot. In addition the proposed project would be required to prepare a Stormwater Quality Management Plan demonstrating how it meets applicable stormwater requirements of the Port BMP Design Manual. Same as the project evaluated in the 2014 Revised FEIR, the proposed 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 requires the development and implementation of a SWPPP by a certified Qualified SWPPP Developer. These changes to the project would reduce potential hydrology and water quality degradation impacts compared to the project evaluated in the 2014 Revised FEIR.

The proposed project does not propose to use groundwater resources or to otherwise affect any groundwater resources that are used for water supply. The proposed project would be in the same location that was analyzed in the 2014 Revised FEIR; therefore, impacts related to flood flows and exposure to flood hazards, tsunami, and seiche zones would also be the same. In addition, there are no changes to the project or circumstances that would increase the risk of release of pollutants during inundation of the project site.

The 2014 Revised FEIR did not identify significant impacts related to adverse hydrology and water quality impacts and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to these hydrology and water quality impacts.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to hydrology and water quality.

4.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XI. Land Use and Planning			
Would the project:			
a) Physically divide an established community?	No	No	Yes
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?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to land use and planning, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to land use and planning. The impact analysis below includes discussion for each of these checklist questions.

4.11.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant impacts to land use and planning. The 2014 Revised FEIR concluded that the project would not affect residential housing or otherwise divide an established community (Section 9.2.1.2.1 of the Revisions to the Draft EIR). The Project would not conflict with surrounding land uses, water uses, or coastal access. Therefore, the Project would not result in any significant conflicts with the PMP. The Project would also not conflict with the ALUCP, the Coastal Act, or the Public Trust Doctrine. Furthermore, the PMP Amendment required approval by the Coastal Commission before the Port District can grant a Coastal Development Permit for the proposed project (Section 9.2.1.2.2 and the Revisions to the Draft EIR). While the project site is located within the City's Multiple Species Conservation Program or Environmentally Sensitive Lands Ordinance, it is not located within the Multiple Habitat Planning Area and there would thus not conflict with an approved biological resources conservation plan (Section 9.2.1.2.3 of the Revisions to the Draft EIR).

4.11.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. The proposed project would include construction of 450 hotel rooms in a single hotel building on the westernmost site on East Harbor Island instead of up to 500 hotel rooms in 2-3 hotel buildings across multiple sites on East Harbor Island as evaluated in the 2014 Revised FEIR. The proposed project also would not include the off-site infrastructure and roadway alignments within Harbor Island Drive right-of-way that were described in the 2014 Revised FEIR. The proposed project would be consistent with the PMP and therefore, unlike the project evaluated in the 2014 Revised FEIR, a PMP amendment would not be required. No other changes to the proposed project that relate to land use and planning are proposed.

4.11.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to land use and planning have been identified during the preparation of this checklist.

4.11.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to physical division of an established community or conflicts with a land use plan, policy or regulation adopted to avoid or mitigate an environmental effect. The proposed project site continues to be used as a parking lot and is approved for use as a hotel.

The existing certified PMP anticipates that East Harbor Island will include future development of, "a high quality hotel of approximately 500 rooms, (that) is sited to be responsive to views of San Diego Bay, the airport, and the downtown San Diego skyline." The future hotel development also will include, "restaurant, cocktail lounge, meeting and conference space, recreational facilities, and ancillary uses." It further states that the maximum height of the future hotel will, "establish consistency with aircraft approach paths." (San Diego Unified Port District 2017:53). The specific land use designations for the project site (Area #3) are Commercial Recreation, which includes hotels and restaurants, and Open Space, which includes landscaped traffic inter-change and median strips, and isolated narrow and irregular shoreline areas where use and development potential is severely limited and where publicly placed works of art can enhance and enliven the waterfront setting. Public access within open space setback areas is limited to passive recreation uses. The project's proposed uses are compatible with the existing land use designations and do not require any land use designation changes. The proposed project would include a public promenade along the East Basin, pedestrian pathways through the project site, and improvements to the Open Space parcel including landscaping, signage, mini destinations, and an on-site delineated pedestrian pathway. Implementation of the project would not physically divide an established community. The project does not include any water uses or in-water components. The proposed project is consistent with the existing certified PMP and, unlike the project evaluated in the 2014 Revised FEIR, no PMP Amendment is required.

There are no changes in circumstances or new information identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to impacts on land use and planning because the proposed hotel development is consistent with the Commercial Recreation and Open Space land use designations of the PMP.

The 2014 Revised FEIR did not identify potentially significant impacts related to land use and planning and did not include mitigation measures to reduce potential impacts. The proposed project would not result in any new significant impacts related to land use and planning.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to land use and planning.

4.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
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	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to mineral resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to mineral resources. The impact analysis below includes discussion for each of these checklist questions.

4.12.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR addresses mineral resources impacts under Section 7.3, Effects Found Not to be Significant. As stated in Section 7.3.3, Mineral Resources, the project site is located on filled land that does not contain mineral resources and that is not identified as a mineral resource recovery site in any land use plan. No potential significant mineral resources impacts were identified, and no mitigation measures or specific conditions were required.

4.12.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project relate to mineral resources.

4.12.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to mineral resources have been identified during the preparation of this checklist.

4.12.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to the loss of availability of mineral resources. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to mineral resources impacts. The project site is located on filled land that does not contain mineral resources and that is not identified as a mineral resource recovery site in any land use plan. The proposed project would not utilize mineral resources or prevent the future use of any mineral resources. No potentially significant mineral resources impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required. The project would not result in a new significant mineral resources impact.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to mineral resources.

4.13 NOISE

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XIII. Noise			
Would the project:			
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?	No	No	Yes
b) Generation of excessive groundborne vibration or groundborne noise levels?	No	No	Yes
c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to noise and vibration, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to noise and vibration. The impact analysis below includes discussion for each of the checklist questions.

4.13.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify a potentially significant construction noise impact because construction noise would be temporary in nature, work would be limited to typical work hours, and no noise-sensitive land uses would be located within the 75 A-weighted decibels (dBA) equivalent noise level (L_{eq}) construction noise contour (San Diego Unified Port District 2013: 9.2.8-7). The 2014 Revised FEIR did not analyze operational noise impacts from stationary noise sources but did analyze operational noise impacts from transportation noise sources. Regarding operational traffic noise, the 2014 Revised FEIR did not identify a potentially significant impact because modeled traffic volumes would not result in an increase in permanent ambient noise levels that would exceed the City's noise threshold (San Diego Unified Port District 2013: 9.2.8-7). The 2014 Revised FEIR did not identify a potentially significant vibration impact because construction vibration would not exceed the FTA threshold of 0.12 in/sec VdB at the nearest vibration-sensitive land uses during pile driving (San Diego Unified Port District 2013: 9.2.8-8).

The 2014 Revised FEIR did identify a potentially significant impact regarding on-site interior noise due to aircraft noise. Although the project area was not located within an airport noise contour, the hotel could still periodically experience high levels of single-event noise from takeoffs and landings from SDIA or the North Island Naval Air Station, which would exceed indoor noise standards.

The EIR included mitigation measures MM NOI-1, MM NOI-2, MM NOI-C1, and MM NOI-C2, which reduce the impact to less than significant by requiring exterior noise levels to be below 65 dBA community noise equivalent level (CNEL) and noise insulation features that reduce interior noise levels to 45 dBA CNEL or less. Note that the text of MM NOI-1

applied to the 175-room hotel and MM NOI-2 applied to a future project applicant for additional hotels but otherwise the text of these two measures is the same.

4.13.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to noise and vibration, the proposed project would involve construction of a single, 450-room hotel, 15 stories high on the westernmost site on East Harbor Island, rather than up to three smaller, 150-to 175-room hotels totaling 500 rooms and located on multiple sites on East Harbor Island (including the proposed project site and the sites immediately east and west of the Sunroad Resort Marina). Regarding trip generation, the proposed project would result in 3,600 ADT, which is 225 fewer ADT than the 3,825 ADT that would result from the project evaluated in the 2014 Revised FEIR. The trip generation estimate for the proposed project is provided in Appendix H.

Regarding construction duration, the proposed project would be built over a 24-month period. This is different than the project evaluated in the 2014 Revised FEIR, which assumed construction of up to three separate hotel buildings would occur during separate, non-overlapping periods of 18 months. The proposed project would involve construction activities up to 8 hours per day five days week, rather than up to 12 hours per day and six days per week. The proposed project would not include the construction of off-site roadway and infrastructure realignments within Harbor Island Drive right-of-way that are described in the 2014 Revised FEIR and would not include demolition of the existing marina locker building. No other changes to the proposed project that relate to noise and vibration are proposed.

4.13.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances related to noise and vibration have been identified since the 2014 Revised FEIR was certified. No new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to noise and vibration have been identified during the preparation of this checklist.

4.13.4 Impact Analysis

Would the project:

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?

Construction

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to substantial increases in short-term construction noise. The proposed project would include 50 fewer hotel rooms, involves less area of ground disturbance due to the reduced number of sites and hotel buildings, have reduced construction hours (7 a.m. to 7 p.m., Monday through Friday), and would not involve off-site roadway and infrastructure realignment improvements. The proposed project would involve types of construction equipment used for similar periods of time and result in similar noise levels to the project evaluated in the 2014 Revised FEIR.

Table 4.13-1 shows the noise levels that would be generated during different phases of proposed project construction compared to the project evaluated in the 2014 Revised FEIR. Detailed construction noise modeling results are shown

in Appendix G. For some construction phases, such as demolition and grading (foundations), noise levels would be higher during construction of the proposed project.

Chapter 5 Article 9.5 §59.5.0404 of the City's Municipal Code prohibits the hours of construction from 7 a.m. to 7 p.m., except for emergency work or if a permit has been granted by the Nosie Abatement and Control Administrator, and sets a construction noise standard of 75 dB L_{eq} at residential land uses during allowed construction hours. As shown in Table 4-3, the loudest construction phase, demolition, would exceed the 75 dB L_{eq} standard if construction activity occurred within 189 feet of a residential land use.

Table 4-3 Comparison of Construction Noise Levels for the Proposed Project and 2014 Revised FEIR

Construction Phase	Noise Level at 100 feet (dB)		75 dB Contour Distance (feet) Proposed Project
	Proposed Project	2014 Revised FEIR	
Demolition (Ground Clearing)	81	78	189
Site Preparation (Grading/Excavation)	78	83	145
Grading (Foundations)	80	72	173
Building Construction (Structural)	78	79	135
Paving (Finishing)	80	83	173
Architectural Coatings	75	N/A	102

Notes: dB = decibel
Detailed construction noise modeling is shown in Appendix G.
Source: San Diego Unified Port District 2013: 9.2.8-6, data modeled by Ascent Environmental in August 2020

No residential land uses are located within 189 feet of the project site. Moreover, there are no new noise-sensitive receptors in the project vicinity since 2014 Revised FEIR certification that would be exposed to the temporary noise levels associated with construction. Therefore, even though noise levels would be higher during two phases of proposed project construction, the proposed project would not result construction noise levels at residential land uses that exceed the City's 75 dB L_{eq} standard. There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified significant effects.

The 2014 Revised FEIR did not identify potentially significant impacts related to construction noise and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to construction noise.

Operation

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to substantial permanent increases in ambient noise levels. The proposed project would not result in any new significant operational noise impacts from stationary sources because the types and locations of noise-generating equipment such as air conditioning units and generators included in the project would be similar to the project evaluated in the 2014 Revised FEIR (e.g., an emergency generator would be enclosed within the proposed hotel building, as shown in Figure 2-5, Ground Level Floor Plan). Rooftop condensers, a rooftop hot water boiler, and an at-grade emergency generator and would be architecturally screened from view, thus attenuating noise generated by such equipment. In addition, the proposed project would result in fewer vehicle trips on local roadways and, therefore, would not result in increased traffic noise levels compared to the project evaluated in the 2014 Revised FEIR. There are no new noise-sensitive receptors in the project vicinity since 2014 Revised FEIR certification that would be exposed to the project's operational noise levels. There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified significant effects.

The 2014 Revised FEIR did not identify potentially significant operational noise impacts for either stationary or transportation noise sources and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to permanent operational noise levels.

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

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to groundborne vibration or noise. The proposed project would involve similar types of construction equipment as the project evaluated in the 2014 Revised FEIR and would not involve pile driving or blasting. In addition, there are no project changes that would involve operations of new vibration-intensive equipment. The highest levels of operational vibration associated with the proposed project would likely be routine truck deliveries to and from the project site. There are no changes to the project that would result in meaningful changes to the number or type of trucks making deliveries to the project site. There are also no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to groundborne vibration or noise.

The 2014 Revised FEIR did not identify potentially significant groundborne noise or vibration impacts and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to groundborne noise or vibration.

c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to aircraft noise exposure. This is because the proposed project is located in the same location as the project evaluated in the 2014 Revised FEIR with the same proximity to aircraft operations and associated noise levels at SDIA. There are also no changes in circumstances or new information identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to aircraft noise exposure.

The 2014 Revised FEIR identified a potentially significant impact related to the project's exposure to aircraft-generated noise and identified mitigation measures MM NOI-C1, NOI-C2, and NOI-2 to reduce potential impacts to less than significant by requiring that exterior noise levels be below 65 dBA CNEL and the use of noise insulation features to reduction of indoor noise levels to below 45 dBA CNEL. The proposed project would be required to implement mitigation measures NOI-C1, NOI-C2, and NOI-2 from the 2014 Revised FEIR and would not result in any new or more severe significant impacts related to aircraft noise exposure.

Applicable Mitigation Measures from the 2014 Revised FEIR

The applicable mitigation measures from the 2014 Revised FEIR are presented below along with modifications to make them applicable to the proposed project. Note that the text of Mitigation Measure NOI-1 applied to the proposed 175-room hotel and Mitigation Measure NOI-2 applied to a future project applicant for additional hotels but otherwise the text of these two measures is identical so only MM NOI-2 is presented below. The measures presented below also include modifications (shown in strikeout underline format) to make them applicable to the proposed project.

MM NOI-C1: Reduction of exterior noise impacts

The plans and specifications for future hotel development shall provide that all exterior noise-sensitive elements of ~~future hotels~~ the proposed project shall be positioned in areas exposed to 65 dBA CNEL or below. If exterior use areas are subject to noise levels greater than 65 dBA CNEL, the design of the project shall incorporate measures such as noise barriers to reduce exterior noise levels to below 65 dBA CNEL. Noise barriers such as walls are commonly used to reduce outdoor noise levels from transportation sources. The effectiveness of a barrier depends on the distance from the source to the barrier, the distance from the receiver to the barrier, and the relative height of the barrier above the line-of-sight between the source and receiver. Noise barriers incorporated into project design shall block this line-of-sight, be constructed of solid material (such as concrete masonry), and be long enough to prevent

sound from flanking around the ends, and shall have a minimum density of 3.5 pounds/square foot and have no gaps or cracks through or below the barrier. Where preservation of views is desired, transparent materials such as glass or Plexiglas can be used.

MM NOI-C2: Reduction of interior noise levels below 45-dBA (CNEL) interior noise requirement

Because future cumulative sound levels would exceed 60 dBA CNEL at the hotel building façades, an interior noise analysis evaluating proposed exterior wall construction, windows, and doors shall be completed after building plans are finalized to ensure that noise levels within habitable rooms will be 45 dBA CNEL or less, as required by California Code of Regulations, Title 24: Noise Insulation Standard and the City's CEQA significance determination thresholds. This analysis shall be submitted to the City's Building Inspection Department prior to obtaining a building permit. The project applicant shall implement the noise reduction measures recommended in the interior noise analysis which may include but are not limited to sound-rated windows, a closed-windows option, and mechanical ventilation meeting applicable CBC requirements.

MM NOI-2: Reduction of interior noise levels below 45 dBA CNEL interior noise requirement

~~Future hotels~~ The proposed project shall include noise insulation features such that an interior noise level of 45 dBA (CNEL) is achieved. An acoustical consultant shall be retained by the Project Applicant prior to commencement of construction to review Proposed Project construction-level plans to ensure that the hotel plans incorporate measures that would achieve the 45 dBA (CNEL) standard. Noise insulation features that could be installed include, but are not limited to, the following:

- Acoustically rated dual pane windows and sliding glass door assemblies
- Heavy-weight drapes and thick carpets for sound absorption

The following minimal performance requirements shall be adhered to as they pertain to interior/exterior sound transmission loss:

- Exterior wall assemblies and walls between guestrooms shall have a minimum sound transmission class (STC) rating of 52
- Walls between guestrooms and stairwells shall have a minimum STC rating of 60
- All floor/ceiling assemblies shall have a minimum STC rating of 60
- Guest room entry doors shall receive full-frame sound insulation stripping

4.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XVI. 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)?	No	No	Yes
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to population and housing, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to population and housing. The impact analysis below includes discussion for each of these checklist questions.

4.14.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify any potentially significant impacts to population and housing and no mitigation measures or specific conditions were required. The 2014 Revised FEIR addresses population and housing impacts under Section 7.3, Effects Found Not to be Significant. As stated in Section 7.3.4, Population and Housing, the project would not induce growth by constructing new housing or extending infrastructure to previously undeveloped areas, and would not displace existing housing or residents.

4.14.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project relate to population and housing.

4.14.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to population and housing have been identified during the preparation of this checklist.

4.14.4 Impact Analysis

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)?

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to substantial unplanned population growth. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to substantial unplanned population growth.

The project would include 50 fewer rooms and, therefore, would require similar levels of construction workers and permanent employees in the same location as the project evaluated in the 2014 Revised FEIR. The numbers of construction employees would vary during the various stages of construction. At the peak of construction there could be as many as 200 employees on-site. In addition, the project would result in the employment of approximately 122 total jobs (full time equivalent individuals), including maintenance staff, hotel management, facilities, and cleaning crews. Up to 100 employees would be present on-site per day. Construction workers and hotel personnel would be available within the general San Diego region and it would not require permanent relocation or otherwise result in unplanned growth. The project proposes redevelopment of an area that has been developed and adequately served by infrastructure and public services for decades. The proposed project would tie into existing utilities infrastructure and would not include infrastructure improvements with capacity to serve other land uses and therefore would not induce unplanned population growth. The proposed project would accommodate existing demand in the San Diego region's hospitality industry and would create jobs that would be filled by area residents. Therefore, the proposed project would not induce substantial unplanned population growth, and to the extent it would induce any level of unplanned growth, it would not do so to a greater extent than the project evaluated in the 2014 Revised FEIR, which included 50 additional hotel rooms. The proposed project would not result in any new significant impacts related to substantial unplanned population growth.

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

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to substantial displacement of people or housing. Similarly, there are no changes in in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to displacement of substantial numbers of existing people or housing. The proposed project consists of an asphalt surface parking lot that is designated for Commercial Recreation and an unimproved Open Space parcel and does not include any existing people or housing units.

No potentially significant population and housing impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required. The proposed project involves development of a hotel on an existing parking lot and associated improvements. It would not displace any existing housing or people. The proposed project would not result in any new significant impacts related to displacement of people or housing.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to population and housing.

4.15 PUBLIC SERVICES

Environmental Issue Area	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XV. Public Services.			
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:			
i. Fire protection?	No	No	Yes
ii. Police protection?	No	No	Yes
iii. Schools?	No	No	Yes
iv. Parks?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to public services, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to public services. The impact analysis below includes discussion for each of these checklist questions.

4.15.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR concluded that the project would result in a significant impact on fire protection service by contributing to the need for the City to construct a new fire station (Section 9.2.10.2.1 of Revisions to Draft EIR). Mitigation Measure PUB-1, described on page 3-10 of the Revised Final EIR requires the project applicant to pay its fair share toward development of a new fire station in the vicinity of Liberty Station as identified in the Peninsula Public Facilities Financing Plan for fiscal year 2001. As discussed, this impact would be significant and unavoidable because the District cannot assure that this mitigation measure would be implemented when needed. Note that the text of Mitigation Measure PUB-1 applies to the proposed 175-room hotel and Mitigation Measure PUB-2 applies to a future project applicant for additional hotels but otherwise the text of these two measures is the same.

The PMP Amendment associated with the project evaluated in the 2014 Revised FEIR did not include a permanent residential component and would therefore not result in an increased enrollment in local schools, nor the need for new schools; thus, there would be no significant impacts on schools (Section 9.2.10.2.3 of Revisions to Draft EIR). The project would not result in population growth; therefore, it would not affect the police department's staffing ratio. The San Diego Police Department confirmed that no additional police facilities would be required due to implementation of the project; thus, there would be no impact on law enforcement (Section 9.2.10.2.2 of Revisions to Draft EIR).

4.15.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. The proposed project would result in 50 fewer hotel rooms on East Harbor Island, and would include 450 hotel rooms within a single building up to 15-stories tall on the westernmost site on East Harbor Island instead of the 500 rooms distributed across two or three new hotel buildings evaluated in the 2014 Revised FEIR (either three four-story hotel buildings or one four-story hotel building and one 10-story hotel building). No other changes to the proposed project that relate to public services are proposed.

4.15.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

The following change in circumstances and new information which was not known and could not have been known has been identified during preparation of this checklist. In May 2019, the City of San Diego prepared an updated Impact Fee Study for the Peninsula community for fiscal year 2019 (City of San Diego 2019). According to this study, a new fire station in the vicinity of Liberty Station as identified in the Peninsula Public Facilities Financing Plan for fiscal year 2001 and referenced in Mitigation Measure PUB-1 in the 2014 Revised FEIR is not needed to provide adequate fire protection service.

No other changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to public services have been identified during the preparation of this checklist.

4.15.4 Impact Analysis

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 following public services:

Fire Protection?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the construction of new or physically altered fire protection facilities. The proposed project would have 50 fewer rooms and 1-2 fewer new hotel buildings compared to the project evaluated in the 2014 Revised FEIR and therefore reduced demand for fire protection facilities.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the construction of new or physically altered fire protection facilities.

The 2014 Revised FEIR identified potentially significant impacts related to fire protection provisions and identified mitigation measure PUB-1 to reduce potential impacts to less than significant by requiring the applicant to contribute its fair share toward a new fire station. However, in May 2019 the City of San Diego prepared an updated Impact Fee Study for the Peninsula community for fiscal year 2019 (City of San Diego 2019). According to this study, a new fire station in the vicinity of Liberty Station as identified in the Peninsula Public Facilities Financing Plan for fiscal year 2001 and referenced in Mitigation Measure PUB-2 in the 2014 Revised FEIR is not needed to provide adequate fire protection service. Therefore, mitigation measure PUB-1 from the 2014 Revised FEIR would not be applicable to the proposed project. The proposed project would not result in any new or more severe significant impacts related to fire protection.

Police protection?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the construction of new or physically altered police protection facilities. The proposed project would not generate demand for police protection because it does not include any housing units, same as the project evaluated in the 2014 Revised FEIR; police protection staffing ratios are based on the number of officers per population.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to provision of police protection services.

The 2014 Revised FEIR did not identify significant impacts related to police protection and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to the construction of new or physically altered police protection facilities.

Schools and Parks?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to demand for new schools or parks. The proposed project would not generate demand for schools because it does not include any housing units, same as the project evaluated in the 2014 Revised FEIR. The project would have 50 fewer rooms and 1-2 fewer hotel buildings than evaluated in the 2014 and a correspondingly lower demand for parks facilities. The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects related to demand for schools and parks facilities.

The 2014 Revised FEIR did not identify significant impacts related demand for new schools or parks and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to demand for schools and parks facilities.

Applicable Mitigation Measures from the 2014 Revised FEIR

For the reasons provided above Mitigation Measures PUB-1 (applying to the 175-room hotel) and PUB-2 (apply to future development under the PMP Amendment) requiring fair share payment toward the cost of a new fire station in the vicinity of Liberty Station would not be applicable to the proposed project.

4.16 RECREATION

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to recreational facilities, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to recreational facilities. The impact analysis below includes discussion for each of these checklist questions.

4.16.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant impacts to recreation. The 2014 Revised FEIR states that the 2014 project would increase the number of visitors to East Harbor Island and change the land use designation of part of the parking lot from Open Space to Commercial Recreation. However, the proposed PMP Amendment requires that a public promenade be constructed as part of future hotel development, thus impacts to increased use of existing parks or recreational facilities would be less than significant (Section 9.2.11.2.1 of Revisions to Draft EIR). The 2014 Revised FEIR also states that development of the promenade would enhance recreational opportunities at the water's edge and would not result in significant impacts to recreation (Section 9.2.11.2.1 of Revisions to Draft EIR).

4.16.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to recreational facilities, the proposed project would include 50 fewer hotel rooms. The proposed project would provide a public promenade along the East Basin frontage of Area #3; the project evaluated in the 2014 Revised FEIR would have provided a public promenade along the East Basin frontage of Area #1 (for the 175-room hotel) and along the East Basin frontage of Area #2 and Area #3 (if two hotels totaling up to 325 rooms were built on each site) or Area #3 (if one hotel totaling up to 325 rooms were built on this site).

The proposed project would also include pedestrian pathways through the project site, and improvements to the Open Space parcel including landscaping, signage, mini destinations, and an on-site delineated pedestrian pathway available for public use. No other changes to the proposed project relate to recreational facilities.

4.16.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to recreational facilities have been identified during the preparation of this checklist.

4.16.4 Impact Analysis

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to substantial physical deterioration of a recreational facility or cause adverse physical effects due to construction of recreational facilities. The project would have 50 fewer rooms than evaluated in the 2014 Revised FEIR and a correspondingly lower demand for recreational facilities. Moreover, the proposed project would have a lesser impact on recreational facilities because it includes additional recreational amenities relative to the project evaluated in the 2014 Revised FEIR including landscaping, signage, mini destinations, and an on-site delineated pedestrian pathway available for public use. There are no changes in circumstances or new information identified above that would not require major revisions to the EIR or result in new significant effects related to demand for recreational facilities.

The 2014 Revised FEIR did not identify significant impacts related recreation and did not identify mitigation measures or specific conditions. The proposed project would include additional pedestrian pathways and mini destinations available for public use, which were not described in the 2014 Revised FEIR. The proposed project would not result in any new significant impacts related to recreational facilities.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to recreational facilities.

4.17 TRANSPORTATION

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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?	No	No	Yes
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No	No	Yes
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No	Yes
d) Result in inadequate emergency access?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to traffic and transportation impacts, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to traffic and transportation impacts. The impact analysis below includes discussion for each of these checklist questions.

4.17.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR identified potentially significant cumulative long-term traffic impacts related to vehicle congestion and level of service (LOS) for five street segments and five intersections (Revisions to Draft EIR, page 9.3-24). Near-term impacts related to vehicle congestion and LOS were concluded to be less than significant (Revisions to Draft EIR, page 9.2.6-10). These traffic impact conclusions were based on two scenarios:

- Scenario A: the proposed 175-room hotel as 175 "business" hotel rooms and the remaining 325 rooms that could occur under the proposed PMP Amendment as "resort" hotel rooms;
- Scenario B: The total of the 500 rooms that could occur under the proposed PMP Amendment in two or three hotels as "business" hotel rooms.

The 2014 Revised FEIR concluded that implementation of Mitigation Measures MM TR-C1 through MM TR-C16 would mitigate the potentially significant impacts to less-than-significant levels (Revisions to Draft EIR, starting at page 9.3-53). However, the intersections and street segments to be improved are within the jurisdiction of the City of San Diego. The mitigation measures are, therefore, contingent upon the action of the City of San Diego and are outside of the jurisdiction of the Port District. In addition, the City does not have an adopted plan or program that lists these intersection or street segment improvements. Therefore, the 2014 Revised FEIR concluded that the Port District cannot assure that these measures would be implemented, and the impacts would remain significant and unmitigated until the mitigation is implemented.

The 2014 Revised FEIR also identified a potentially significant parking impact related to development of the western marina parking lot (Revisions to Draft EIR, pages 9.2.6-24 to 9.2.6-29) and identified mitigation measure PARK-1 requiring adequate on-site parking and approval of a Parking Management Plan for development of the existing west marina parking lot which would reduce the impact to less than significant (Revisions to Draft EIR, page 9.2.6-30).

The 2014 Revised FEIR did not identify potentially significant impacts related to conflicts with the Congestion Management Program, construction traffic, changed in air traffic patterns, safety hazards because of design features or incompatible uses, conflicts with adopted policies, plans, or programs supporting alternative transportation, or inadequate emergency access (Revisions to Draft EIR, pages 9.2.6-17 to 9.2.6-23; 9.2.6-28 to 9.2.6-29).

4.17.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. With regard to traffic and transportation, the proposed project would involve construction of a single, 450-room hotel, 15 stories high on the westernmost site on East Harbor Island, rather than up to three smaller, 150-to 175-room hotels totaling 500 rooms and located on multiple sites on East Harbor Island (including the proposed project site and the sites immediately east and west of the Sunroad Resort Marina). Regarding trip generation, the proposed project would result in 3,600 ADT, which is 225 fewer ADT than the 3,825 ADT that would result from the project evaluated in the 2014 Revised FEIR. The trip generation estimate for the proposed project is provided in Appendix H.

Regarding construction duration, the proposed project would be built over a 24-month period. This is different than the project evaluated in the 2014 Revised FEIR, which assumed construction of up to three separate hotel buildings during separate, non-overlapping periods of 18 months. The proposed project would involve construction activities up to 8 hours per day, five days week, rather than up to 12 hours per day, six days per week. The proposed project would not include the construction of off-site roadway and infrastructure realignments within Harbor Island Drive right-of-way that are described in the 2014 Revised FEIR and would not include demolition of the existing marina locker building.

Same as the project evaluated in the 2014 Revised FEIR, energy conservation and sustainability features would be incorporated into the design and construction of the proposed project. The design features related to traffic and transportation described below would be incorporated as conditions of approval of the proposed project:

- Limit idling time for commercial vehicles, including deliveries and construction vehicles, to 5 minutes.
- Install bicycle parking facilities.
- Provide a shuttle service to and from the airport. It is estimated that the shuttle would reduce the total number of trips by 7.5% (note this trip reduction estimate is not included in the trip generation analysis performed for the proposed project and described in this section)..

No other changes to the proposed project that relate to traffic and transportation are proposed.

4.17.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to traffic and transportation have been identified during the preparation of this checklist.

4.17.4 Impact Analysis

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(b), which pertains to vehicle miles travelled?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects related to conflicts with a program, plan, ordinance, or policy addressing transit, roadway, bicycle, or pedestrian facilities including parking because the project would include fewer hotel rooms, fewer vehicle trips, and reduced construction activity when compared to the project evaluated in the 2014 Revised FEIR. In addition, the proposed project would include several features that would benefit the performance of the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Specifically, the proposed project would provide a shuttle service to and from the airport, a public promenade along the East Basin and other pedestrian facilities, ride share drop off and pick up areas, bicycle parking, preserve the existing bus turnout along East Harbor Island Drive, and financially participate in the District Shuttle Service on a fair share basis, which would serve the proposed project site.

The proposed project also would provide on-site parking in compliance with the requirements of the Tidelands Parking Guidelines. The project would provide 350 parking spaces within two surface parking areas located on the eastern and western sides of the proposed hotel building. Of the 350 total parking spaces, 14 would be designated for public parking, 10 would be Americans with Disabilities Act (ADA) compliant, and 2 would be ADA van-accessible spaces. All hotel, restaurant and retail employees parking would be accommodated on-site. Based on the Tidelands Parking Guidelines requirements of 0.6 space per room for 450 rooms (270 spaces) and 1.2 spaces for every 1,000 square feet of meeting space (12 spaces), the proposed project would be required to provide 282 spaces. As a result, the proposed project would provide a surplus of 54 parking spaces (350 total spaces provided, less 282 required spaces and 14 spaces dedicated for public use).

There are no changes in circumstances or new information identified above that would require major revisions in the 2014 Revised FEIR or result in new significant effects related to vehicle miles travelled or conflicts with a program, plan, ordinance, or policy addressing transit, roadway, bicycle, or pedestrian facilities including parking.

Regarding the roadway circulation systems, as shown in Table 4-4 the proposed project is anticipated to generate 3,600 trips per day, with 180 trips being generated during the AM peak hour (108 inbound and 72 outbound) and 252 trips generated during the PM peak hour (101 inbound and 151 outbound).

Table 4-4 Proposed Project Trip Generation

Land Use	Units	Trip Rate	ADT	AM Peak Hour					PM Peak Hour				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Resort Hotel	450 Rooms	8/ Room	3,600	5%	180	(6:4)	108	72	7%	252	(4:6)	101	151

Source: Appendix H.

Based on the data provided in Table 4-5, the proposed project is anticipated to generate fewer trips, both daily and during the peak hours, than Scenario A of the project analyzed in the 2014 Revised FEIR, which was anticipated to generate 3,825 ADT, 228 AM peak hour trips (117 inbound and 111 outbound) and 292 PM peak hour trips (139 inbound and 153 outbound).

Table 4-5 2014 Revised FEIR Trip Generation – Scenario A

Use	Size	Daily Trip Ends (ADT)		AM Peak Hour				PM Peak Hour			
		Rate	Volume	% of ADT[d]	In:Out Split	Volume In	Volume Out	% of ADT	In:Out Split	Volume In	Volume Out
Project Evaluated in the 2014 Revised FEIR											
Hotel (Business)	175 rooms	7 /room[a]	1,225	8%	40:60	39	59	9%	60:40	66	44
Hotel (Resort)	325 rooms	8 /room[b]	2,600	5%	60:40	78	52	7%	40:60	73	109
Marina	600 berths	4 /berth[c]	2,400	3%	30:70	22	50	7%	60:40	101	67
Subtotal (proposed project):		—	**6,225**	—	—	**139**	**161**	—	—	**240**	**220**
Existing Marina (600 berths)		—	*-2,400*	—	—	*-22*	*-50*	—	—	*-101*	*-67*
Scenario A Net Project Trips:		—	**3,825**	—	—	**117**	**111**	—	—	**139**	**153**

a Rate is based on SANDAG's (*Not So)* Brief Guide of Vehicular Traffic Generation Rates, "*Business Hotel*."
b Rate is based on SANDAG's (*Not So)* Brief Guide of Vehicular Traffic Generation Rates, "*Resort Hotel*."
c Rate is based on City of San Diego's Trip Generation Rate Summary Table and includes "ancillary uses".
d ADT = Average Daily Traffic
Source: Appendix H.

Because the proposed project is anticipated to generate fewer trips than Scenario A of the project evaluated in the 2014 Revised FEIR, its impact on LOS, vehicle congestion, and performance of the adjacent roadway network would be the same or less than the traffic related impact significance conclusions analyzed and identified in the 2014 Revised FEIR.[4]

The 2014 Revised FEIR identified potentially significant cumulative long-term traffic impacts related to vehicle congestion and LOS for five street segments and five intersections and identified Mitigation Measures MM TR-C1 through MM TR-C16 that would require fair share payments for measures that improve LOS and reduce vehicle congestion, but would not reduce the impacts to the less than significant; the traffic impacts identified in the 2014 Revised FEIR would remain significant and unavoidable with mitigation. Mitigation measures TR-C1 through TR-C6 applied specifically to the development of the 175-room hotel evaluated in the 2014 Revised FEIR and are not applicable to the proposed project.

The proposed project would be required to implement mitigation measures MM TR-C7, TR-C9, and TR-C12 through MM TR-C16 from the 2014 Revised FEIR and would not result in any new or more severe significant traffic or transportation impacts. MM TR-C8 (future hotel development in PMP Amendment Area) regarding reconfiguration of the westbound approach to provide an additional thru lane has been implemented since certification of the 2014 Revised FEIR and, therefore, is not applicable to the proposed project.

The 2014 Revised FEIR did not identify significant effects related to conflicts with a program, plan, ordinance, or policy addressing transit, roadway, bicycle, or pedestrian facilities and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to conflicts with a program, plan, ordinance, or policy addressing transit, roadway, bicycle, or pedestrian facilities.

The 2014 Revised FEIR also identified a potentially significant parking impact related to development of the western marina parking lot and identified mitigation measure PARK-1 requiring adequate on-site parking and approval of a Parking Management Plan for development of the existing west marina parking lot which would reduce the impact to less than significant. Because the proposed project would not involve or affect the existing west marina parking lot, this potentially significant parking impact and mitigation measure would not apply to the proposed project. The proposed project provides a surplus of parking and the removal of the existing 740-space parking spaces that have

[4] A vehicle miles traveled (VMT) analysis is not required by the Public Resources Code or CEQA Guidelines. However, for informational purposes, it should be noted that because the project proposes a hotel use, consistent with the uses considered in the 2014 Revised FEIR but with 50 fewer rooms, it is anticipated that VMT associated with the proposed project would be lesser than those associated with the project analyzed in the 2014 Revised FEIR (although VMT was not required, nor included as a component of the 2014 Revised FEIR).

been allowed on the project site under a District Temporary Use and Occupancy Permit (which allows for the interim parking use and can be cancelled with 30 days' notice) would not result in a significant parking impact, This impact conclusion is consistent with the 2014 Revised FEIR, which concluded that development of up to 325 hotel rooms on the proposed project site would have a less than significant impact on parking because such developed would not result in the loss of any public parking spaces (Revisions to Draft EIR, p. 9.2.6-24).

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?

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to inadequate emergency access or hazards due to geometric design features or incompatible uses. Similarly, the changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects related to the adequacy of emergency access or hazards due to geometric design features or incompatible uses. The proposed project would have 50 fewer rooms compared to the project evaluated in the 2014 Revised FEIR and would not result in any physical changes to access in the surrounding area, and would not include any new geometric design features; the proposed project would not include any substantial changes to the design of roadways serving the project site such that emergency access would become inadequate. There have been no changes in circumstances since certification of the 2014 Revised FEIR that would result in incompatible uses with the proposed project.

The 2014 Revised FEIR did not identify significant impacts related to emergency access or a substantial increase in hazards due to a geometric design feature or incompatible uses and no mitigation measures or specific conditions were required. The proposed project would not result in a new significant impact related to emergency access. Also refer to Section 4.9(f) regarding emergency response and evacuation plans.

Applicable Mitigation Measures from the 2014 Revised FEIR

Mitigation measures TR-C7, TR-C9, TR-C12, TR-C13, TR-C14, TR-C15, TR-C16, as modified, would be applicable to the proposed project. Mitigation measures TR-C1 through TR-C6 applied specifically to the development of the 175-room hotel evaluated in the 2014 Revised FEIR and are not applicable to the proposed project.

MM TR-C8 (future hotel development in PMP Amendment Area) regarding reconfiguration of the westbound approach to provide an additional thru lane has been implemented since certification of the 2014 Revised FEIR and therefore is not applicable to the proposed project.

The proposed project would not remove any parking spaces in the existing west marina parking lot, and it would not result in the removal of any public parking spaces, so MM PARK-1 is not applicable to the proposed project.

MM TR-C7: North Harbor Drive / Harbor Island Drive / Terminal 1 intersection (East Airport Entrance)

The Project Applicant shall contribute a fair share percentage of 18.4% ~~20.7% for Scenario A or 22.4% for Scenario B~~ towards restriping the northbound approach to provide a left-turn lane, a shared left-turn/thru lane, a thru lane, and a right-turn lane. The fair share contribution shall be paid to the City of San Diego traffic impact fee program. The improvements at this intersection shall include the following: remove the northbound right-turn lane from a "yield" ~~"free"~~ movement and introduce right-turn "overlap" phasing; retain the north/south "split" signal phasing; and restripe the eastbound approach to convert the right-turn lane to a shared thru/right-turn lane. Modifications to the triangular median in the southeast portion of the intersection are expected. Modifications to the traffic signal timing in conjunction with the change in lane designations are also recommended.

MM TR-C9: North Harbor Drive / Laurel Street intersection

The Project Applicant shall contribute a fair share percentage of 4.5% ~~5.2% for Scenario A or 5.3% for Scenario B~~ towards the reconfiguration of the eastbound approach to provide a third left-turn lane and restriping the southbound approach to provide a single shared left-turn/right-turn lane. To accommodate the additional lane, widening and modifications to the median/roadway shall be required. All three eastbound lanes on Laurel Street shall

continue to Pacific Highway, where the number 1 lane would trap into the left-turn lane(s). An overhead sign bridge(s) shall be implemented to instruct drivers of the trap lane. Modifications to the traffic signal timing in conjunction with the change in lane destination are also recommended. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

MM TR-C12: North Harbor Drive between Harbor Island Drive and Rental Car Access Road street segment

The Project Applicant shall contribute a fair share percentage of 5.5% ~~5.8% for Scenario A or 5.3% for Scenario B~~ towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

MM TR-C13: North Harbor Drive between Rental Car Access Road and Laurel Street street segment

The Project Applicant shall contribute a fair share percentage of 4.5% ~~2.4% for Scenario A or 2.2% for Scenario B~~ towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

MM TR-C14: North Harbor Drive between Laurel Street and Hawthorn Street street segment

The Project Applicant shall contribute a fair share percentage of 6.7% ~~7.1% for Scenario A or 6.5% for Scenario B~~ towards the addition of one southbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

MM TR-C15: Laurel Street between North Harbor Drive and Pacific Highway street segment

The Project Applicant shall contribute a fair share percentage of 1.3% ~~1.4% for Scenario A or 1.3% for Scenario B~~ towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

MM TR-C16: Laurel Street between Pacific Highway and Kettner Boulevard street segment

The Project Applicant shall contribute a fair share percentage of 2.5% ~~2.7% for Scenario A or 2.5% for Scenario B~~ towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.

4.18 TRIBAL CULTURAL RESOURCES

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
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)?	No	No	Yes
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	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to tribal cultural resources, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to tribal cultural resources. The impact analysis below includes discussion for each of these checklist questions.

4.18.1 Summary of 2014 Revised FEIR

No potentially significant tribal cultural resources impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required.

4.18.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project relate to tribal cultural resources.

4.18.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to tribal cultural resources have been identified during preparation of this checklist.

4.18.4 Impact Analysis

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?

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to tribal cultural resources. The project site is located on filled land dredged from San Diego Bay that is not known to contain subsurface tribal cultural resources. The proposed project is located in the same location (East Harbor Island) and would involve less ground disturbing activities during construction due to the inclusion of 1-2 fewer hotel buildings in the proposed project.

There are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to tribal cultural resources. No California Native American tribes that are traditionally or culturally affiliated with Port tidelands have requested that the District provide notification of projects in the tribe's area of traditional and cultural affiliation. Therefore, the District is not required to engage in AB 52 tribal consultation for the proposed project. Impacts to tribal cultural resources would be reduced compared to the project evaluated in the 2014 Revised FEIR because the proposed project would result in a smaller area of construction ground disturbance, which is due to the construction of one hotel building instead or two or three hotel buildings across multiple sites, and the proposed project not including infrastructure and roadway alignments within Harbor Island Drive right-of-way. In addition, the project site is located on filled land dredged from San Diego Bay that is not known to contain subsurface tribal cultural resources or human remains. In the unlikely event that human remains are encountered during construction for the proposed project, as specified by State Health and Safety Code Section 7050.5, no further disturbance would occur until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, excavation or construction would halt in the area of the discovery, the area would be protected, and consultation and treatment would occur as prescribed by law. If the County Coroner recognizes the remains to be Native American, he or she would contact the Native American Heritage Commission, who would appoint the Most Likely Descendant. If remains are determined to be Native American, a plan would be developed regarding the treatment of human remains and associated burial objects, and the plan would be implemented under the direction of the Most Likely Descendant. Therefore, the proposed project would not result in any new significant impacts related to tribal cultural resources.

The 2014 Revised FEIR did not identify potentially significant tribal cultural resources impacts and did not identify mitigation measures or specific conditions. The proposed project would not result in any new significant impacts related to tribal cultural resources.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to tribal cultural resources.

4.19 UTILITIES AND SERVICE SYSTEMS

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XIX. Utilities and Service Systems			
Would the project:			
a) Require or result in the relocation or construction of 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?	No	No	Yes
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	No	No	Yes
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?	No	No	Yes
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?	No	No	Yes
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	No	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to utilities and service systems, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to utilities and service systems. The impact analysis below includes discussion for each of these checklist questions.

4.19.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant impacts on utilities and services systems. As discussed in Section 9.2.10.2.5 of Revisions to Draft EIR, there is sufficient water available from the City water system to serve proposed development of up to 500 hotel rooms that could occur under the PMP Amendment. The 2014 Revised FEIR states that development allowed under the PMP amendment would not exceed capacity at the Point Loma Wastewater Plant; however, the downstream sewer system does not have capacity to support the future hotel development and would require replacement of 8-inch sewer lines with 10-inch sewer lines and new sewer manholes to reduce impacts to a less-than-significant level (Section 9.2.10.2.6 of Revisions to Draft EIR). The 2014 Revised FEIR identified Mitigation Measure MM PUB-3 requiring replacement of the existing 8-inch sewer and four manholes prior to construction of the second hotel within the PMP Amendment area.

Construction of storm drains to accommodate new hotels and application of appropriate construction and operational BMPs, developed and implemented through a Port District-approved SWPPP and Urban Stormwater Management Plan (USMP) would ensure that stormwater impacts would be less than significant (Section 9.2.10.2.7 of Revisions to Draft EIR). The 2014 Revised FEIR concluded that the proposed project would involve commercial construction of more than 40,000 square feet and therefore it would contribute to a significant cumulative impact on solid waste facilities. Mitigation measures MM PUB-C1 (for the 175-room hotel) and MM PUB-C2 (for future hotel development under the PMP Amendment) requiring preparation of a waste management plan would reduce the impact to less than significant (Revisions to Draft EIR, page 9.3-53; page 9.3-57). San Diego Gas and Electric Company confirmed that that the site would be served by SDG&E for electric and gas services and no new or expanded facilities are needed beyond hookups at the project site; thus the 2014 Revised FEIR concludes that impacts would be less than significant (Section 9.3.10.2.9 of Revisions to Draft EIR).

4.19.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. The proposed project would have 50 fewer rooms than the project evaluated in the 2014 Revised FEIR, and a correspondingly lower demand for utilities and service systems. The proposed project would not include the sewer line upgrades described in the 2014 Revised FEIR; these upgrades were identified to the serve the 175-room hotel located east of Sunroad Resort Marina and the second hotel within the PMP Amendment Area and are not required to serve the proposed 450-room hotel building on the westernmost portion of East Harbor Island. The proposed project does not include any hotel buildings or related improvements to the sites located immediately east and west of the Sunroad Resort Marina as described in the 2014 Revised FEIR. The proposed project includes the following changes in utility infrastructure connections and improvements:

- Water – An existing 16-inch water line in Harbor Island Drive west and south of the property would provide water service to the project. The connection to Harbor Island Drive to the south is the most feasible connection point.
- Wastewater – An existing 15-inch sewer line in Harbor Island Drive south of the property would provide sewer service to the Project. In addition, there are two 12-inch sewer lines directly servicing the property from the 15-inch Sewer Line. One or both lines would provide service to the project. The proposed project would not tie into the existing 8-inch sewer line that was required to be replaced with a larger capacity line by MM PUB-3 in the 2014 Revised FEIR.
- Stormwater – An existing 30-inch storm drain along the northerly boundary of the property would receive stormwater most of the site. In addition, there is an existing 18-inch storm drain along the easterly boundary that may provide an additional outfall for stormwater flow. Site drainage would be by overland flow and on-site storm drain systems to the two existing storm drains. No additional outfalls to the harbor are proposed as part of the project.
- Electric, Telephone, and Cable – Electric, telephone, and cable lines run along Harbor Island Drive at the property frontage, and through the west corner of the Open Space parcel. In addition, two electric lines transect the site along the northern portion, and one transects the Open Space parcel. The existing lines would serve the project.
- Gas – A gas line runs along Harbor Island Drive at the property frontage, and through the west corner of the Open Space parcel. This existing line would serve the project.

4.19.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

Available capacity at the Point Loma Wastewater Plant is approximately 240 million gallons per day (GPD) of wastewater, and averages treatment of approximately 175 million GPD (City of San Diego 2020), which is the same as reported in the 2014 Revised FEIR (Appendix I-3 to Revisions to Draft EIR). No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at

the time the 2014 Revised FEIR was certified as complete, related to utilities and service systems have been identified during the preparation of this checklist.

4.19.4 Impact Analysis

Would the project:

a) Require or result in the relocation or construction of 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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities. While the 2014 Revised FEIR included requirements for upsizing downstream sewer lines, the proposed project would tie into existing lines and replacement of existing sewer lines and manholes would not be necessary; these improvements were tied to the development of a hotel building on the site immediately east of the Sunroad Resort Marina and would not apply to the proposed project on the westernmost site on East Harbor Island. Thus, impacts would be reduced under the proposed project relative to the 2014 project.

The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to adverse utilities and service systems impacts.

The 2014 Revised FEIR did not identify significant impacts related to the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities. Requirements for upsizing the downstream sewer lines are no longer necessary. The proposed project would not result in any new or more severe significant impacts related to these utilities and service system impacts.

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?

The changes in the proposed project identified above would not require major revisions to the 2014 Revised FEIR or result in new significant effects or a substantial increase in the severity of previously identified effects related to water supply, wastewater treatment capacity, generation of solid waste, or compliance with solid waste regulations because the project would have 50 fewer rooms compared to the project evaluated in the 2014 Revised FEIR and therefore reduced demand for water supply and wastewater treatment, and lower amounts of solid waste generation. Available capacity at the Point Loma Wastewater Treatment Plan has not decreased since certification of the 2014 Revised FEIR. Moreover, there are no changes to the project that would result in conflicts with statutes or regulations related to solid waste management and reduction. The project is expected to generate an estimated 5,250 CY of spoils and

debris to be exported off-site. A soils testing group will be engaged to provide preliminary tests and will provide on-site observation during operations. The project is anticipated to generate construction debris that would be subject to the landfill diversion requirements of the City of San Diego Construction and Demolition Debris Deposit Ordinance. The appropriate City of San Diego Waste Diversion paperwork will be completed for the project. The changes in circumstances or new information identified above would not require major revisions to the EIR or result in new significant effects related to these utilities and service systems.

The 2014 Revised FEIR did not identify significant impacts related to water supply and wastewater treatment demand and did not identify mitigation measures or specific conditions. The proposed project would not result in any new or more severe significant impacts related to these utilities and service system impacts.

However, the 2014 Revised FEIR identified a potentially significant impact to solid waste facilities and identified MM PUB-C2 that require approval of a waste management plan prior to start of construction and would reduce this impact to less than significant. The proposed project would be required to implement MM PUB-C2 from the 2014 Revised FEIR and would not result in any new or more severe significant impacts related to solid waste.

Applicable Mitigation Measures from the 2014 Revised FEIR

The applicable mitigation measure from the 2014 Revised FEIR is presented below. Note that the text of Mitigation Measure PUB-C1 applied to the proposed 175-room hotel and Mitigation Measure PUB-C2 applied to a future project applicant for additional hotels. The only difference in the text of these two measures are two additional commitments made by the Project Applicant that are shown in MM PUB-C1, so only PUB-C1 is presented below. As explained above, MM PUB-3 from the 2014 Revised FEIR required upgrades of an existing 8-inch sewer line prior to hotel development on other sites located east of the proposed project site and is not applicable to the proposed project.

MM PUB-C1

Prior to the issuance of any demolition, grading, or construction permits, the Project Applicant shall prepare a waste management plan and submit it for approval to the City's Environmental Services Department. The plan shall include the following, as applicable:

- Tons of waste anticipated to be generated
- Material type of waste to be generated
- Source separation techniques for waste generated
- How materials would be reused on-site
- Name and location of recycling, reuse, and landfill facilities where recyclables and waste would be taken if not reused on-site
- A "buy-recycled" program for green construction products, including mulch and compost
- How the project would aim to reduce the generation of construction/ demolition debris
- How waste reduction and recycling goals would be communicated to subcontractors
- A timeline for each of the three main phases of the Project (demolition, construction, and occupancy)
- How the Refuse and Recyclable Materials Storage Regulations would be incorporated into construction design of building's waste area
- How compliance with the Recycling Ordinance would be incorporated into the operational phase
- International Standards of Operations, or other certification, if any

In addition, the Project Applicant has committed to implement the following recycling measures. These measures shall be included in the Waste Management Plan:

- Provide interior and exterior storage areas for recyclables and green waste and provide adequate recycling containers on site.

- Provide education and publicity about recycling and reducing waste, using signage and a case study.

4.20 WILDFIRE

ENVIRONMENTAL ISSUE AREA	Any Project Changes or New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information of Substantial Importance?	Less Than Significant Impact/No Substantial Change From Previous Analysis
XX. Wildfire			
Would the project:			
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones?	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?	No	No	Yes
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?	No	No	Yes
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	No	Yes
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	No	Yes

The following impact analysis includes an overview of what was analyzed in the 2014 Revised FEIR, a summary of project changes as they relate to wildfire, and a summary of changes in circumstances or new information which was not known and could not have been known as it relates to wildfire. The impact analysis below includes discussion for each of these checklist questions.

4.20.1 Summary of 2014 Revised FEIR

The 2014 Revised FEIR did not identify potentially significant impacts related to wildfire and no mitigation measures or specific conditions were required. As discussed in Section 9.2.4.2.8 of Revisions to Draft EIR, no risk of wildland fire exists on East Harbor Island and there would be no impact.

4.20.2 Changes in the Project

A summary of the changes from the proposed project compared to the project evaluated in the 2014 Revised FEIR is provided in Table 3-1. No changes to the proposed project relate to wildfire because there is no risk of wildfire on East Harbor Island or elsewhere in the vicinity of the project.

4.20.3 Changes in Circumstances or New Information Which Was Not Known and Could Not Have Been Known

No changes in circumstances or new information, which was not known and could not have been known with the exercise of reasonable due diligence at the time the 2014 Revised FEIR was certified as complete, related to wildfire have been identified during the preparation of this checklist.

4.20.4 Impact Analysis

Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones? 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?

There are no changes in the proposed project identified above that would require major revisions to the 2014 Revised FEIR or result in new significant effects related to wildfire or secondary effects associated with wildfires. Similarly, there are no changes in circumstances or new information identified above that would require major revisions to the EIR or result in new significant effects related to wildfire. This is because the proposed project is located on East Harbor Island which is not located in or near State responsibility areas or lands classified as high fire hazard severity zones.

No potentially significant wildfire impacts were identified in the 2014 Revised FEIR and no mitigation measures or specific conditions were required. The proposed project would not result in any new significant impacts related to wildfire.

Applicable Mitigation Measures from the 2014 Revised FEIR

There are no mitigation measures or specific conditions from the 2014 Revised FEIR identified to reduce impacts related to wildfire.

5 REFERENCES

Chapter 1, Introduction

No references were used.

Chapter 2, Project Description

San Diego Unified Port District. 2009. *Board of Port Commissioners Policy No. 713, Tenant Landscaping Improvements and Maintenance*.

———. 2017. *Port Master Plan.* Available: https://www.portofsandiego.org/public-records/administration/port-san-diego-master-plan

Chapter 3, Environmental Checklist for Supplemental Environmental Review

No references were used.

Chapter 4, Environmental Checklist

American Bird Conservancy. 2015. Bird-Friendly Building Design. Available: https://abcbirds.org/wp-content/uploads/2015/05/Bird-friendly-Building-Guide_20151.pdf. Accessed April 9, 2020.

California Department of Forestry and Fire Protection. 2020. California Fire Hazard Severity Zone Viewer. Available: https://gis.data.ca.gov/datasets/789d5286736248f69c4515c04f58f414. Accessed November 17, 2020.

CAL FIRE. *See* California Department of Forestry and Fire Protection.

California Department of Fish and Wildlife. 2011. CNDDB Data Use Guidelines v4.2. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=27285&inline. Accessed October 2020.

California Energy Commission. 2017 (May 7). 2016 Energy Standards - Nonresidential Envelope. SVABO Institute. Available: https://ww2.energy.ca.gov/title24/orc/documents/2016_Nonresidential_Envelope_05-07-2017.pdf. Accessed October 26, 2020.

———. 2018 (March). 2019 Building Energy Efficiency Standards - Frequently Asked Questions. Available: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf. Accessed October 26, 2020.

California Native Plant Society. 2020. *Inventory of Rare and Endangered Plants of California* (online edition, v8-03 0.39). Available: http://www.rareplants.cnps.org. Accessed April 9, 2020.

California Natural Diversity Database. 2020. Results of electronic records search. Sacramento: California Department of Fish and Wildlife, Biogeographic Data Branch. Accessed April 9, 2020.

Carrier Johnson + Culture. 2020 (February). *Sun Study*. San Diego, Ca. Prepared for Sunroad Enterprises, San Diego, CA.

CDFW. *See* California Department of Fish and Wildlife.

CEC. *See* California Energy Commission.

City of San Diego. 2011. *California Environmental Quality Act - Significance Determination Thresholds*. Department of Development Services. Available: https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/news/sdtceqa.pdf. Accessed July 22, 2020.

———. 2019. *Peninsula Impact Fee Study, Fiscal Year 2019.* Available: https://www.sandiego.gov/sites/default/files/peninsula_impact_fee_study_0.pdf

eBird. 2020. eBird [web application]. Ithaca, NY. Available: http://www.ebird.org. Accessed August 12, 2020.

Gowens, Ed. Senior Airport Planner. Airport Land Use Commission, San Diego County Regional Airport Authority. March 12, 2020—email to Michelle Chan at Port of San Diego regarding Airport Land Use Commission review requirements.

iNaturalist. 2020. iNaturalist [web application]. Available: https://www.inaturalist.org/. Accessed August 2020.

Intergovernmental Panel on Climate Change. 2007. *Climate Change 2007—The Physical Science Basis. Working Group I Contribution to the Fourth Assessment Report*. Available: https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed August 1, 2020.

IPCC. *See* Intergovernmental Panel on Climate Change.

Loss, S. R., T. Will, S. S. Loss, and P. P. Marra. 2014. Bird-Building Collisions in the United States: Estimates of Annual Mortality and Species Vulnerability. *The Condor*. 116:8–23.

Naval Facilities Engineering Command Southwest and Port of San Diego. 2018 (March). *2017 San Diego Bay Eelgrass Inventory Update*. San Diego, CA. Prepared by Merkel & Associates, Inc., San Diego, CA.

NAVFAC and Port of San Diego. *See* Naval Facilities Engineering Command Southwest and Port of San Diego.

Office of Planning and Research. 2008. *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Available: http://opr.ca.gov/docs/june08-ceqa.pdf. Accessed August 2, 2020.

OPR. *See* Office of Planning and Research.

San Diego Air Pollution Control District. 2016 (April). Rule 20.2: New Source Review (NSR) – Non-Major Stationary Sources, Table 20.2-1. Available: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Permits/APCD_20.2-2016.pdf. Accessed August 1, 2020.

San Diego County Regional Airport Authority. 2014. *San Diego International Airport Land Use Compatibility Plan*. Available: https://san.org/Portals/0/Documents/Land%20Use%20Compatibility/SDIA/SDIA%20ALUCP%20Ch%201-6%20(May%202014).pdf

San Diego Unified Port District. 2009. *Board of Port Commissioners Policy No. 713, Tenant Landscaping Improvements and Maintenance*.

———. 2020. *Draft EIR for the Lockheed Martin Harbor Island Facilities Demolition and Sediment Remediation Project*. July 2020. Available; https://pantheonstorage.blob.core.windows.net/ceqa/Lockheed_Martin_Harbor_Island_Facilities_Demolition_and_Sediment_Remediation_Project-DEIR_and_Appendices.pdf.

Stokes, Drew. Field Biologist. San Diego Natural History Museum, San Diego, CA. August 11, 2020—telephone conversation to Pam Brillante of Ascent Environmental regarding special-status bats in San Diego.

Unitt, Phil. 2012. *San Diego County Bird Atlas*: Great Blue Heron (Ardea herodias). Available: http://sdplantatlas.org/birdatlas/pdf/Great%20Blue%20Heron.pdf. Accessed April 9, 2020.

UC Davis. *See* University of California, Davis.

University of California, Davis. 2014 (March 18). *What's New in the 2013 Code? Changes to mandatory Title 24 lighting requirements*. California Lighting Technology Center, UC Davis. Available: https://cltc.ucdavis.edu/sites/default/files/files/publication/title-24-2013-code-changes-140318.pdf. Accessed October 26, 2020.

WBWG. See Western Bat Working Group.

Western Bat Working Group. 2017. Western Bat Species Accounts. Available: http://wbwg.org/western-bat-species/. Accessed August 2020.

Weston Solutions, Inc. 2006 (September). *Marine Resources Assessment Sunroad Hotel Project*. Carlsbad, CA. Prepared for Jones and Stokes, San Diego, CA.

Zeiner, D.C., W.F. Laudenslayer, Jr., K.E. Mayer, and M. White. 1988-1990. California's Wildlife. Vol. I-III. California Department of Fish and Game, Sacramento, CA. Available: https://wildlife.ca.gov/data/cwhr/life-history-and-range. Accessed August 2020.

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MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

CEQA and the State CEQA Guidelines (PRC Section 21081.6 and State CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment."

The San Diego Unified Port District ("District") has prepared an addendum to the Revised FEIR for the Sunroad Harbor Island Hotel Project and East Harbor Island Subarea Port Master Plan Amendment (Unified Port District #83356-EIR-783; State Clearinghouse #2006021027) ("2014 EIR") for the Sunroad Harbor Island East Hotel Project ("proposed project"). A Mitigation Monitoring and Reporting Program (MMRP) is required because the addendum identifies applicable mitigation measures from the 2014 EIR that apply to the proposed project. Adoption of this MMRP would occur along with approval of the proposed project.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner prior to implementation of the proposed project. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the mitigation measures (as amended through the addendum), implementation responsibility, mitigation timing, and monitoring and reporting procedure. The numbering of mitigation measures follows the numbering sequence found in the accompanying addendum.

ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, the District is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed.

Inquiries should be directed to:

Contact: Michelle Chen, Senior Planner
3195 Pacific Highway
San Diego, CA 92101
Phone: (619) 686-8097
Email: mchan@portofsandiego.org

The location of this information is:

3195 Pacific Highway
San Diego, CA 92101

The District is responsible for overall administration of the MMRP and for verifying that the project applicant, Sunroad HIE Hotel Partners, has completed the necessary actions for each measure.

REPORTING

The District shall document and describe the compliance of the proposed project with the required mitigation measures either within the attached table or in separate monitoring documentation.

MITIGATION MONITORING AND REPORTING PROGRAM TABLE

The categories identified in the attached MMRP table are described below.

- Impact – This column provides the verbatim text of the identified impact.
- Mitigation Measure – This column provides the verbatim text of the adopted mitigation measure from the 2014 EIR. Where new language was added to apply the measure to the proposed project, text is shown as underlined; where language was removed, text is shown in ~~strikethrough~~.
- Implementation Responsibility – This column identifies the party responsible for implementing the mitigation measure.
- Timing – This column identifies the time frame in which the mitigation will be implemented.
- Verification – This column is to be dated and signed by the District staff person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.

Mitigation Monitoring and Reporting Program

Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
Biological Resources			
MM BIO-2: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Surveys To ensure compliance with MBTA and similar provisions under the Fish and Game Code, the Project Applicant or its contractor shall implement one of the following restrictions: 1. Conduct all vegetation removal during the non-breeding season (between ~~September~~ October 1 and December ~~January~~ 31) OR 2. If construction activities are scheduled between ~~February~~ January 1 and ~~August 31~~ September 30, a qualified ornithologist (with knowledge of the species to be surveyed) shall conduct a focused nesting survey prior to the start of vegetation removal and within any potential nesting habitat (mature trees, eaves on buildings, etc.). The nesting bird survey area shall include the entire limits of disturbance plus a 300-foot buffer for non-raptors and a 500-foot buffer for ground-nesting raptors. The nesting surveys shall be conducted within 1 week prior to initiation of construction activities and shall consist of a thorough inspection of the Project site by a qualified ornithologist(s). The survey work shall occur between sunrise and 12:00 p.m. when birds are most active. If no active nests are detected during these surveys, no additional mitigation is required. If the survey confirms nesting within 300 feet of the disturbance footprint for non-raptors or within 500 feet for raptors, a no-disturbance buffer shall be established around each nest site to avoid disturbance or destruction of the nest until after the nesting season or after a qualified ornithologist determines that the young have fledged. The size of the no-disturbance buffer shall be determined by the qualified biologist at the time of discovery. If there is a delay of more than 7 days between when the nesting bird survey is performed and vegetation removal begins, it shall be confirmed that no new nests have been established.	Sunroad HIE Hotel Partners, L.P.	Throughout Construction	Contractor to confirm with District that vegetation removal was completed outside of breeding season OR Contractor will report the results of the focused nesting survey to the District. If survey confirms nesting within 300 feet of the disturbance footprint for nonraptors or 500 feet for raptors, report to District that buffers are in place to protect nesting birds during vegetation removal and construction activities.
Geology and Soils			
MM GEO-2: To reduce the soil liquefaction and lateral spreading potential beneath the surface of the site, the Project Applicant shall implement all of the measures recommended in the 2020 NOVA Geotechnical Investigation ~~Geocon Study~~ (Appendix D~~H1 of the EIR~~) including the following site design criteria:	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	The Project Applicant shall implement all of the measures recommended in the 2020 NOVA Geotechnical Investigation (Appendix D) including the

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
I. Except for ~~stone columns and HEAT Anchor~~ ground improvement methods such as deep soil mixing (DSM) or stone columns ~~methods~~, dewatering shall be undertaken for excavations below an elevation of 5 feet above mean sea level (MSL). II. Ground improvements~~ or deep foundations~~ shall be implemented in conformance with the CBC site design criteria for Type B faults, which include the Rose Canyon Fault zone, as summarized in the following table. Site Design Criteria The following seismic design parameters were determined in accordance with ASCE 7-16 Chapter 21 Risk-Targeted Maximum Considered Earthquake (MCE_R) Ground Motion Hazard Analysis. Risk Category IV was assumed for the structure. Site-Specific *Seismic Design Parameters*			site design criteria. The site plans showing the design criteria will be submitted to the District and the City of San Diego.

Parameter	Site Class D
Site Latitude, degrees	32.725856
Site Longitude, degrees	-117.195508
Mapped Short Period Spectral Acceleration, S_S	1.47
Mapped One-Second Period Spectral Acceleration, S_1	0.50
Short Period Spectral Acceleration Adjusted For Site Class, S_{MS}	2.27
One-Second Period Spectral Acceleration Adjusted For Site, S_{M1}	1.92
Design Short Period Spectral Acceleration, S_{DS}	1.51
Design One-Second Period Spectral Acceleration, S_{D1}	1.28
Geometric Mean (MCE_G) Peak Ground Acceleration	0.69

~~Parameter~~	~~Ground Deep Improvements~~	~~CBC Foundations~~	~~Reference~~
~~Seismic Zone~~	~~0.40~~	~~0.40~~	~~Table 16-I~~
~~Seismic Profile~~	~~S_D~~	~~S_F~~	~~Table 16-J~~
~~Seismic Coefficient, C_a~~	~~0.57~~	~~0.57~~	~~Table 16-Q~~
~~Seismic Coefficient, C_v~~	~~1.02~~	~~1.87~~	~~Table 16-R~~

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Mitigation Measures				Implementation Responsibility	Timing	Monitoring and Reporting Procedure
~~Near Source Factor, N_a~~	~~1.3~~	~~1.3~~	~~Table 16-S~~			
~~Near Source Factor, N_v~~	~~1.6~~	~~1.6~~	~~Table 16-S~~			
~~Seismic Source~~	~~B~~	~~B~~	~~Table 16-U~~			

Notes:

~~S_D is the soil profile type that contains types of soils that are vulnerable to potential failure or collapse under seismic loading. This soil is often liquefiable.~~

~~O_r is the soil profile type that contains dense granular soil or stiff cohesive soil.~~

~~C_a is the seismic response coefficient for proximity and is defined by site conditions such as seismic zone and soil profile type. C_a is determined using Table 16-Q of the CBC.~~

~~C_v is the seismic response coefficient and is defined by site conditions such as seismic zone and soil profile type. C_v is determined using Table 16-R of the CBC.~~

~~N_a is the near-source factor for C_a and is defined by the seismic source type and the closest distance to a known seismic source. N_a is determined using Table 16-S of the CBC.~~

~~N_v is the near-source factor for C_v and is defined by the seismic source type and the closest distance to a known seismic source. N_v is determined using Table 16-T of the CBC.~~

~~B is the seismic source type between A—faults that produce the largest magnitude events with high rates of seismic activity, and C—faults that are not capable of producing large magnitude events and have low rates of seismic activity. B is determined using Table 16-U of the CBC.~~

A. As recommended in the Geotech Study, ground improvements to mitigate the effects of liquefiable soils and lateral spreading shall be implemented for settlement-sensitive structures (~~such as the~~ use of ~~stone columns or the HEAT~~DSM method). ~~In addition, ground improvements for lateral spreading will be extended at least 5 feet below the mud line of the adjacent San Diego Bay along the existing shoreline, and for all structures the minimum depth of ground improvements will be as specified by the Geotech Study conducted by Geocon in Marth 2006.~~

B. The Project-Applicant shall follow recommendations listed in the Geotech Study conducted by ~~Geocon in March 2006~~NOVA in February 2020 for ~~ground densification methods, minimum cone penetration test (CPT) tip resistance, minimum Standard Penetration Test (SPT), the installation of stone columns, and~~ DSM.

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
C. Following densification of the existing soils, the Project Applicant shall place additional fill material on the site to re-establish existing grades of between approximately 13 to 16 feet above MSL. III. The Project Applicant shall consult with a geotechnical engineer regarding potential placement of settlement monuments and recommended Grading Specifications. Settlement monuments may only be required if site elevation is significantly raised. IV. Site preparation shall begin with the removal of all deleterious material and vegetation. The depth of removal should be such that material exposed in cut areas or soil to be used as fill is relatively free of organic matter. Material generated during stripping and/or site demolition shall be exported from the site. A. The upper 3 feet of soil within areas subjected to ground improvement by DSM ~~densification by stone columns~~ shall be removed, moisture conditioned and recompacted. B. The Project Applicant shall follow the recommended procedures listed in the Geotech Study with respect to removal of existing fill soil and insertion of new fill. In addition, any imported soils shall have an expansion index of less than ~~50~~10 and a maximum particle dimension of ~~3~~2 inches. V. The Project Applicant shall follow the recommendations set by in the Geotech Study for the Proposed Project regarding foundations for the structures. A. A geotechnical engineer shall observe foundation excavations to verify that the exposed soil conditions are consistent with those anticipated and that they have been extended to the appropriate bearing strata. ~~VI. The Project Applicant shall follow the recommendations set in the Geotech Study for the Proposed Project with regard to utilization of ground foundations such as deep foundations, when they shall be required.~~ VII. Where proposed, buildings can be supported by shallow or mat foundations in improved ground~~, or by deep foundations capable of transmitting foundation loads through the hydraulic fill and bay deposits into the Bay Point Formation~~. Such foundation systems include the following: A. Foundation excavations shall be observed by the geotechnical engineer prior to the placement of reinforcing steel and concrete to verify that the exposed soil conditions are consistent with those anticipated. If unanticipated soil conditions are encountered, foundation modifications may be required. VIII. The Project Applicant shall follow recommendations listed on the Geotech Study regarding the use of concrete slab-on-grade, including guidelines for crack-control spacing. IX. In addition to the extensive mitigation measures listed above, the Geotech Study provides detailed recommendations for the appropriate engineering of other Project components including retaining walls, pavement, and drainage. These measures, where applicable to the proposed project, shall also be implemented.			

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
Greenhouse Gas Emissions and Climate Change			
MM SLR-C1: Prior to the approval of a Coastal Development Permit for the proposed project ~~hotel development that could occur under the proposed PMP Amendment~~, the project applicant shall retain a qualified engineer who shall prepare for the Port District's review and approval an up-to-date, site specific analysis of the potential impacts of sea level rise by the year 2100 on the proposed hotel development. The report shall determine whether adaptive strategies for accommodating the potential for sea level rise and the potential for more frequent wave overtopping and wave-induced impact forces are necessary and, if so, shall recommend appropriate adaptive strategies such as the use of perimeter floodwalls or other flood barriers around either the outer margins of Harbor Island or the proposed development to be incorporated into the design of the proposed development.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Coastal Development Permits	The project applicant shall retain a qualified engineer who shall prepared for the District's review and approval an up-to-date, site-specific analysis of the potential impacts of sea-level rise by the year 2100 The site plans reflective of the strategies to improve the resiliency of the project site will be submitted to the District and the City of San Diego.
Hazards and Hazardous Materials			
Mitigation Measure HZ-2a Prior to the initiation of construction activities, the Project Applicant shall prepare and submit to the Port District's Environmental Services Department for approval, a contingency plan outlining the procedures to be followed by the Project Applicant and/or contractor in the event that undocumented areas of contamination are encountered during construction activities. The contingency plan shall provide, at a minimum, that in the event undocumented areas of contamination are discovered during construction activities, the Project Applicant and/or its contractor shall discontinue construction activities in the area of suspected contamination and shall notify the Port District forthwith, and, in consultation with the County of San Diego Department of Environmental Health's Hazardous Materials Division and subject to the review and approval of the Port District and any other public agency with jurisdiction over the contamination encountered, the Project Applicant shall prepare a plan for abatement and remediation of the contamination. Construction activities shall be discontinued until the Project Applicant and/or contractor has implemented all appropriate health and safety procedures required by the Port District and any other agency with jurisdiction over the contamination encountered.	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	Contractor to prepare and submit to the District's Environmental and Land Use Management Department for approval, a contingency plan outlining the procedures to be followed by the Project Applicant(s) and/or contractor in the event that undocumented areas of contamination are encountered during construction activities. Contractor to notify District/County Department of Environmental Health if

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
			contaminated soils encountered.
Mitigation Measure HZ-2b Prior to the initiation of construction activities, the Project Applicant shall prepare a Site Safety Plan to address possible hazardous materials present within the Project Site associated with the UST that was removed , the marina and past use of the surrounding areas for industrial purposes including aerospace and other industries. The Site Safety Plan shall be subject to Port of San Diego approval, and, if deemed appropriate, the Project Applicant shall, in consultation with the County of San Diego Department of Environmental Health, be prepared to address hazardous construction-related activities within the boundaries of the project site to reduce potential health and safety hazards to workers and the public.	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	Prior to the initiation of construction activities, the Contractor shall prepare a Site Safety Plan to address possible hazardous materials present within the Project Site to the District.
Noise and Vibration			
MM NOI-C1: Reduction of exterior noise impacts The plans and specifications for future hotel development shall provide that all exterior noise-sensitive elements of ~~future hotels~~ the proposed project shall be positioned in areas exposed to 65 dBA CNEL or below. If exterior use areas are subject to noise levels greater than 65 dBA CNEL, the design of the project shall incorporate measures such as noise barriers to reduce exterior noise levels to below 65 dBA CNEL. Noise barriers such as walls are commonly used to reduce outdoor noise levels from transportation sources. The effectiveness of a barrier depends on the distance from the source to the barrier, the distance from the receiver to the barrier, and the relative height of the barrier above the line-of-sight between the source and receiver. Noise barriers incorporated into project design shall block this line-of-sight, be constructed of solid material (such as concrete masonry), and be long enough to prevent sound from flanking around the ends, and shall have a minimum density of 3.5 pounds/square foot and have no gaps or cracks through or below the barrier. Where preservation of views is desired, transparent materials such as glass or Plexiglas can be used.	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	An acoustical consultant shall be retained by the Project Applicant prior to commencement of construction to review Project construction-level plans to ensure that the hotel plans incorporate measures that will achieve the 65 dBA (CNEL) or below standard. Construction level plans showing adherence to standards will be provided to the District and the City of San Diego.
MM NOI-C2: Reduction of interior noise levels below 45-dBA (CNEL) interior noise requirement Because future cumulative sound levels would exceed 60 dBA CNEL at the hotel building façades, an interior noise analysis evaluating proposed exterior wall construction, windows, and doors shall be completed after building plans are finalized to ensure that noise levels within habitable rooms will be 45 dBA CNEL or less, as required by California Code of Regulations, Title 24: Noise Insulation Standard and the City's CEQA significance determination thresholds. This analysis shall be submitted to the City's Building Inspection Department prior to obtaining a building permit. The project applicant shall implement the noise reduction	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	An acoustical consultant shall be retained by the Project Applicant prior to commencement of construction to review Proposed Project construction-level plans to ensure that the hotel plans

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
measures recommended in the interior noise analysis which may include but are not limited to sound-rated windows, a closed-windows option, and mechanical ventilation meeting applicable CBC requirements.			incorporate measures that will achieve the 45 dBA (CNEL) standard. Construction level plans showing adherence to standards will be provided to the District and the City of San Diego.
MM NOI-2: Reduction of interior noise levels below 45 dBA CNEL interior noise requirement ~~Future hotels~~ The proposed project shall include noise insulation features such that an interior noise level of 45 dBA (CNEL) is achieved. An acoustical consultant shall be retained by the Project Applicant prior to commencement of construction to review Proposed Project construction-level plans to ensure that the hotel plans incorporate measures that would achieve the 45 dBA (CNEL) standard. Noise insulation features that could be installed include, but are not limited to, the following: ▶ Acoustically rated dual pane windows and sliding glass door assemblies ▶ Heavy-weight drapes and thick carpets for sound absorption The following minimal performance requirements shall be adhered to as they pertain to interior/exterior sound transmission loss: ▶ Exterior wall assemblies and walls between guestrooms shall have a minimum sound transmission class (STC) rating of 52 ▶ Walls between guestrooms and stairwells shall have a minimum STC rating of 60 ▶ All floor/ceiling assemblies shall have a minimum STC rating of 60 ▶ Guest room entry doors shall receive full-frame sound insulation stripping	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	An acoustical consultant shall be retained by the Project Applicant prior to commencement of construction to review Proposed Project construction-level plans to ensure that the hotel plans incorporate measures that will achieve the 45 dBA (CNEL) standard. Construction level plans showing adherence to standards will be provided to the District and the City of San Diego.
Transportation			
MM TR-C7: North Harbor Drive / Harbor Island Drive / Terminal 1 intersection (East Airport Entrance) The Project Applicant shall contribute a fair share percentage of 18.4% ~~20.7% for Scenario A or 22.4% for Scenario B~~ towards restriping the northbound approach to provide a left-turn lane, a shared left-turn/thru lane, a thru lane, and a right-turn lane. The fair share contribution shall be paid to the City of San Diego traffic impact fee program. The improvements at this intersection shall include the following: remove the northbound right-turn lane from a "yield" ~~"free"~~ movement and introduce right-turn "overlap" phasing; retain the north/south "split" signal phasing; and restripe the eastbound approach to convert the right-turn lane to a shared thru/right-turn lane. Modifications to the triangular median in the southeast portion of the intersection	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	Pay a fair share percentage of 18.4% towards restriping the northbound approach to provide a left-turn lane, a shared left-turn/thru lane, a thru lane, and a right-turn lane. The fair share contribution shall be paid to the City of San

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
are expected. Modifications to the traffic signal timing in conjunction with the change in lane designations are also recommended.			Diego traffic impact fee program.
MM TR-C9: North Harbor Drive / Laurel Street intersection The Project Applicant shall contribute a fair share percentage of 4.5% ~~5.2% for Scenario A or 5.3% for Scenario B~~ towards the reconfiguration of the eastbound approach to provide a third left-turn lane and restriping the southbound approach to provide a single shared left-turn/right-turn lane. To accommodate the additional lane, widening and modifications to the median/roadway shall be required. All three eastbound lanes on Laurel Street shall continue to Pacific Highway, where the number 1 lane would trap into the left-turn lane(s). An overhead sign bridge(s) shall be implemented to instruct drivers of the trap lane. Modifications to the traffic signal timing in conjunction with the change in lane destination are also recommended. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to Construction	Pay a fair share percentage of 4.5% towards the reconfiguration of the eastbound approach to provide a third left-turn lane and restriping the southbound approach to provide a single shared left-turn/right-turn lane. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
MM TR-C12: North Harbor Drive between Harbor Island Drive and Rental Car Access Road street segment The Project Applicant shall contribute a fair share percentage of 5.5% ~~5.8% for Scenario A or 5.3% for Scenario B~~ towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Building Permits	Pay a fair share percentage of 5.5% towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
MM TR-C13: North Harbor Drive between Rental Car Access Road and Laurel Street street segment The Project Applicant shall contribute a fair share percentage of 4.5% ~~2.4% for Scenario A or 2.2% for Scenario B~~ towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Building Permits	Pay a fair share percentage of 4.5% towards the addition of one westbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
MM TR-C14: North Harbor Drive between Laurel Street and Hawthorn Street street segment The Project Applicant shall contribute a fair share percentage of 6.7% ~~7.1% for Scenario A or 6.5% for Scenario B~~ towards the addition of one southbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Building Permits	Pay a fair share percentage of 6.7% towards the addition of one southbound lane along the

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Mitigation Measures	Implementation Responsibility	Timing	Monitoring and Reporting Procedure
			street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
MM TR-C15: Laurel Street between North Harbor Drive and Pacific Highway street segment The Project Applicant shall contribute a fair share percentage of 1.3% ~~1.4% for Scenario A or 1.3% for Scenario B~~ towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Building Permits	Pay a fair share percentage of 1.3% towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
MM TR-C16: Laurel Street between Pacific Highway and Kettner Boulevard street segment The Project Applicant shall contribute a fair share percentage of 2.5% ~~2.7% for Scenario A or 2.5% for Scenario B~~ towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Building Permits	Pay a fair share percentage of 2.5% towards the addition of one eastbound lane along the street segment. The fair share contribution shall be paid to the City of San Diego traffic impact fee program.
Utilities and Service Systems			
MM PUB-C1 Prior to the issuance of any demolition, grading, or construction permits, the Project Applicant shall prepare a waste management plan and submit it for approval to the City's Environmental Services Department. The plan shall include the following, as applicable: ▶ Tons of waste anticipated to be generated ▶ Material type of waste to be generated ▶ Source separation techniques for waste generated ▶ How materials would be reused on-site ▶ Name and location of recycling, reuse, and landfill facilities where recyclables and waste would be taken if not reused on-site	Sunroad HIE Hotel Partners, L.P.	Prior to the Issuance of Certificate of Occupancy	Project Applicant shall prepare a waste management plan and submit it for approval to the City's Environmental Services Department and a copy of the City approved plan to the District.

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▶ A "buy-recycled" program for green construction products, including mulch and compost ▶ How the project would aim to reduce the generation of construction/ demolition debris ▶ How waste reduction and recycling goals would be communicated to subcontractors ▶ A timeline for each of the three main phases of the Project (demolition, construction, and occupancy) ▶ How the Refuse and Recyclable Materials Storage Regulations would be incorporated into construction design of building's waste area ▶ How compliance with the Recycling Ordinance would be incorporated into the operational phase ▶ International Standards of Operations, or other certification, if any In addition, the Project Applicant has committed to implement the following recycling measures. These measures shall be included in the Waste Management Plan: ▶ Provide interior and exterior storage areas for recyclables and green waste and provide adequate recycling containers on site. ▶ Provide education and publicity about recycling and reducing waste, using signage and a case study.			