

# **Harbor Island West Marina Redevelopment Project**

## **Volume 1 - Final Mitigated Negative Declaration**

UPD #MND-2013-80, SCH# 2019129019

*Prepared by:*



**San Diego Unified Port District**  
P.O. Box 120488  
San Diego, CA 92112-0488

November 2023

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## List of Attachments

Attachment A: Initial Study/Environmental Checklist for the Harbor Island West Marina Redevelopment Project

~~December 2019~~**November 2023**  
**San Diego Unified Port District**  
**P.O. Box 120488**  
**San Diego, CA 92112-0488**  
**(UPD #MND-2013-80, SCH# 2019129019)**

**DRAFT FINAL MITIGATED NEGATIVE DECLARATION FOR  
HARBOR ISLAND WEST MARINA REDEVELOPMENT PROJECT  
SAN DIEGO, CALIFORNIA**

**EXECUTIVE SUMMARY**

The San Diego Unified Port District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this ~~Draft~~ Final Mitigated Negative Declaration (MND) for the Harbor Island West Marina Redevelopment Project (Project). The Project site is located at 2040 Harbor Island Drive, San Diego, CA 92101 (see Figure 1 and Figure 2 in Attachment A, Initial Study). The Project site is located within Planning District 2, Harbor Island/Lindbergh Field, of the District's certified Port Master Plan (PMP).

This document has been prepared pursuant to the requirements of CEQA (Public Resources Code Section 21000, et seq.) and the implementing regulations, the "CEQA Guidelines" (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000, et seq.), as well as the District's CEQA Guidelines (Clerk Document No. 36294). Specifically, this document meets the requirements of CEQA Guidelines Sections 15070 and 15071 and District CEQA Guidelines Section V., and the attached Initial Study (see Attachment A) meets the requirements of CEQA Guidelines Section 15063 and District CEQA Guidelines Section IV. Together, the Initial Study and MND meet CEQA's content requirements by including a project description; a description of the environmental setting; thresholds of significance; potential environmental impacts and feasible mitigation measures for any significant effects; discussion of consistency with plans and policies; and names of the document preparers.

**A. Project Description**

The Harbor Island West Marina Redevelopment Project (proposed Project) includes the replacement of several elements comprising the Harbor Island West Marina (HIWM), an existing marina facility that provides services and amenities to the boating community and waterfront access opportunities to the public. The proposed Project would replace the existing aged dock structure and existing landside buildings and infrastructure to accommodate a wider range of recreational vessel sizes, create more slip opportunities for a greater diversity of boaters including entry level boaters, and to ensure the HIWM's long-term operational viability.

The proposed Project includes the following components: (1) demolition of 146,000 square feet of existing docks (providing 620 boat slips); (2) new construction of 139,218 ~~140,000~~ square feet of new docks (providing 620 ~~623~~ boat slips); (3) demolition of 23,000 square feet of existing building space and reconstruction of approximately 15,682 square feet of new building space; (4) removal of the 120,000-square-foot existing paved parking lot and installation of a new 116,000-square-foot paved parking lot; (5) removal of 15,000 square feet of existing landscaping with installation of approximately 18,000 square feet of new landscaping; (6) construction of a new 12-foot-wide public promenade and reconstruction of an existing 6,000-square-foot viewing deck for public use; and, (7) modernization of onsite utilities and lighting. The project proponent, HIW Associates, LP, also seeks a new 50 ~~49~~-year lease for construction, operation, and maintenance of the proposed Project.

**B. Proposed Finding**

In accordance with CEQA, the Draft MND was distributed for a 30-day public review and comment period beginning on December 5, 2019, and ending on January 6, 2020. During this timeframe, the document was available for review by various federal, state, regional, and local agencies as well as by interested



organizations and individuals. The written comment letters received during the public review period and District responses to the comments received are included following this Executive Summary within this Final MND.

This Final MND addresses the comments received on the Draft MND during public review. In response to comments received during the public review period, the waterside development portion of the project was revised to accommodate mid-size slips. Rather than the number of docks decreasing from 11 to 10 and the number of slips decreasing from 620 to 603, the number of docks remained at 11 and the number of slips increased to 623. This, in turn, resulted in an increase in eelgrass impacts that can be mitigated onsite as demonstrated by the Eelgrass Mitigation Plan included as Appendix B2 of Volume 2, Appendices. Additional minor modifications, clarifications, and typographical corrections have been made for clarity. Minor changes clarify the likely start date for construction, the lease term, the number of parking spaces available to the public and that the existing western restroom building would also be replaced. These minor changes did not affect the significance findings summarized in Section IV, *Environmental Analysis*, below. Any text additions are indicated as underlined text and any text deletions are shown as strikeout text, with the exception of the comment letters, District responses, and Table 4, *Harbor Island West Marina Redevelopment Project MND Mitigation Monitoring and Reporting Plan*, in Chapter V (changes to mitigation measures are shown in the Initial Study) which have been provided in a clean format.

The Initial Study prepared for the proposed Project (Attachment A) found that the proposed Project would not result in significant impacts in the following areas: aesthetics, agriculture and forestry resources, air quality, cultural resources, energy, greenhouse gas emissions, land use and planning, mineral resources, noise, population and housing, public services, traffic, tribal cultural resources, utilities and service systems, and wildfire.

Impacts that were shown to have a less than significant impact with mitigation were biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, recreation. Measures to avoid or mitigate the effects would be incorporated into the Project to reduce the impacts to below a level of significance. These measures are identified in Table 4 and discussed below in Section IV. Environmental Analysis.

## COMMENTS RECEIVED ON THE DRAFT MITIGATED NEGATIVE DECLARATION AND RESPONSES

All comment letters received on the Draft Mitigated Negative Declaration (MND) for the Harbor Island West Marina Redevelopment Project in response to a 30-day public review period have been organized by agency, organization, and individual according to date received. The District received two comment letters on the Draft MND during the public review period that began on December 5, 2019, and closed on January 6, 2020. Each of the comment letters received during the public comment period were alphabetically and numerically coded to facilitate identification and tracking (Table RTC-1).

The letters are divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers. The comment number consists of two parts. The first part is the letter of the document and the second is the number of the comment. Thus, Comment A1 is the first comment (comment #1) of comment letter A.

**Table RTC-1**  
**Comment Letters Received on Draft MND**

Letter	Commenter	Date
<b><i>State Agencies</i></b>		
A	Kate Gordon, Director, State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	January 6, 2020
B	Melody Lasiter, Coastal Program Analyst, California Coastal Commission	January 6, 2020

**LETTER A: STATE OF CALIFORNIA**  
**GOVERNOR'S OFFICE OF PLANNING AND RESEARCH**  
**STATE CLEARINGHOUSE AND PLANNING UNIT**

**Commenter: Kate Gordon, Director**

**Date: January 6, 2020**

# Harbor Island West Marina Redevelopment Project

## Summary

<b>SCH Number</b>	2019129019
<b>Lead Agency</b>	San Diego Unified Port District
<b>Document Title</b>	Harbor Island West Marina Redevelopment Project
<b>Document Type</b>	MND - Mitigated Negative Declaration
<b>Received</b>	12/5/2019
<b>Project Applicant</b>	HIW Associates, LP
<b>Present Land Use</b>	Land Use: Commercial Recreation; Water Use: Recreational Boat Berthing, Fueling Dock, Sanitary Pump Station; Zoning/GP: N/A

<b>Document Description</b>	The project is for the repair, maintenance, replacement and redevelopment of the Harbor Island West Marina. Three (one single-story and two two-story) existing retail, office and marina buildings will be demolished and replaced with two two-story buildings with the same height as existing but a smaller building footprint and total usable square footage. The existing parking lot and landscaping will be removed and replaced. The existing pool and jacuzzi will be reconstructed. An existing public viewing deck will be renovated and a public promenade along the waterfront will be added. Utilities and lighting will be upgraded. The waterside portion of the project consists of demolishing and replacing the existing deteriorated docks. Existing concrete piles will either be reused or replaced. There would be no increase in operational capacity of the redeveloped marina.
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<b>Contact Information</b>	Megan Hamilton San Diego Unified Port District  3165 Pacific Highway P.O. Box 120488 San Diego, CA 92101  Phone : (619) 686-8113
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## Location

<b>Coordinates</b>	32°43'29"N 117°12'30"W
<b>Cities</b>	San Diego
<b>Counties</b>	San Diego
<b>Cross Streets</b>	Harbor Island Drive west end
<b>Zip</b>	92101
<b>Total Acres</b>	25.7
<b>State Highways</b>	75
<b>Railways</b>	San Diego MTS
<b>Airports</b>	San Diego International Airport
<b>Schools</b>	High Tech High School
<b>Waterways</b>	San Diego Bay
<b>Township</b>	17S
<b>Range</b>	3W
<b>Base</b>	SB

## Notice of Completion

<b>Review Period Start</b>	12/5/2019
<b>Review Period End</b>	1/6/2020
<b>Development Type</b>	Commercial (15,600 Sq. Ft.) Recreational (Marina)
<b>Local Action</b>	Coastal Permit
<b>Project Issues</b>	Biological Resources Geologic/Seismic Recreation/Parks Toxic/Hazardous Water Quality
<b>Reviewing Agencies</b>	California Air Resources Board California Coastal Commission California Department of Conservation California Department of Fish and Wildlife, Marin Region 7 California Department of Fish and Wildlife, South Coast Region 5 California Department of Parks and Recreation California Department of Resources Recycling and Recovery California Department of State Parks, Division of Boating and Waterways California Department of Transportation, District 11 California Department of Transportation, Division of Aeronautics California Department of Water Resources California Governor's Office of Emergency Services California Highway Patrol California Native American Heritage Commission California Natural Resources Agency California Public Utilities Commission California Regional Water Quality Control Board, San Diego Region 9 California San Diego River Conservancy California State Lands Commission Department of Toxic Substances Control Office of Historic Preservation State Water Resources Control Board, Division of Water Quality

## Attachments

### Environmental Document

HIWM_DraftMND_December2019_TOPPRINT PDF 40457 K	HIWM_NOA-NOI_signed PDF 155 K
Summary Form PDF 105 K	

### NOC

NOC PDF 1036 K
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## **RESPONSE TO LETTER A**

**State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit**

**Commenter: Kate Gordon, Director**

**Date: January 6, 2020**

**Response to Comment A1:** The comment letter confirms that the Draft MND for the Harbor Island West Marina Redevelopment project was distributed to selected state agencies, and that no state agencies submitted comments to the State Clearinghouse by the review closing date. The San Diego Unified Port District (SDUPD; District) has complied with statutory noticing obligations for documents pursuant to the California Environmental Quality Act (CEQA).

Note that one state agency, the California Coastal Commission (CCC) provided a comment letter directly to the District. This letter is included as letter B.

**LETTER B: CALIFORNIA COASTAL COMMISSION**

**Commenter: Melody Lasiter, Coastal Program Analyst**

**Year: January 6, 2020**

**CALIFORNIA COASTAL COMMISSION**

SAN DIEGO AREA  
7575 METROPOLITAN DRIVE, SUITE 103  
SAN DIEGO, CA 92108-4421  
(619) 767-2370



January 6, 2020

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

Re: Comments on the Draft Mitigated Negative Declaration for the Harbor Island West Marina Redevelopment Project (UPD #MND-2013-80)

Dear Ms. Hamilton:

Thank you for the opportunity to review and provide comment on the above-referenced project and notice of preparation, which was received on December 5, 2019. Commission staff has reviewed the Draft Mitigated Negative Declaration ("DMND"), dated December 2019, for the proposed project, which consists of a bayside redevelopment on an approximately 25.77-acre site (3.81 acres of land and 21.96 acres of water) located at 2040 Harbor Island Drive in San Diego. Waterside improvements include the demolition of 146,000 sq. ft. of existing docks (providing 620 boat slips) and construction of 140,000 sq. ft. of new docks (providing 603 boat slips). Landside improvements include demolition of 23,000 sq. ft. of existing building space and reconstruction of approximately 15,682 sq. ft. of new building space; removal of the 120,000 sq. ft. existing paved parking lot (providing 351 private parking spaces) and installation of a new 116,000 sq. ft. paved parking lot (providing 376 private parking spaces and 4 public parking spaces); removal of 15,000 sq. ft. of existing landscaping with installation of approximately 18,000 sq. ft. of new landscaping; construction of a new 12 ft. wide public promenade and reconstruction of an existing 6,000 sq. ft. viewing deck for public use; and modernization of onsite utilities and lighting. Please see below for our preliminary comments:

Number and Mix of Boat Slips

[Commission staff is concerned with the reduction of the total number of boat slips and higher proportion of large boat slips (+51 ft.) to medium slips (26-30 ft.) proposed. Please explain the rationale associated with the proposed changes] and provide data on the existing utilization of slips by size at the Harbor Island West Marina] and San Diego Bay.]

B1

B2

B3

Lighting

[Please provide a detailed description of the proposed lighting.] [Note that LED lighting has the potential to disrupt natural circadian rhythms of sensitive wildlife leading to disruption in behaviors (e.g., breeding, foraging) and sleep due to the high blue light frequencies in LED lights. Environmental studies recommend a correlated color temperature (CCT) of 3,000 Kelvin or below, a range that contains less blue light. In

B4

B5



addition, lighting should be analyzed to ensure that it is the minimum necessary in terms of number of lights, and that the operating characteristics of the lights are designed to decrease impacts of lighting (e.g., directed/shielded to avoid light spillover, sensors to dim lights).

B6

#### Bay Fill

The DMND identifies that bay fill would increase by 57.55 sq. ft. due to the pile area. The project should be designed to minimize the amount of fill. Please identify whether fill can be reduced given that the overall number of piles will be reduced from 326 to 313 piles. Please also describe the mitigation that will be required for any fill impacts. Note that mitigation should prioritize the removal of fill elsewhere in San Diego Bay.

B7

B8

#### Sea Level Rise

The Sea Level Rise (SLR) analysis found the development would be impacted during a 100-year storm in 2100. Please describe how the development has been designed to accommodate potential flooding in the future. In addition, please indicate if the projections include the proposed public promenade and, if not, provide an analysis of SLR impacts to the public promenade. Finally, provide a visual identifying SLR impacts under the medium-high risk aversion scenario (per the Commission's SLR Guidance) for the years 2060 and 2100.

B9

B10

#### Parking

The proposed project would provide 25 additional private parking spaces and 4 public parking spaces for a total of 380 parking spaces. Given that no public parking currently exists at the site, the number of boat slips is proposed to decrease, the number of parking spaces accommodated onsite will increase, and the project site is located on public tidelands, additional public parking spaces should be included in the project.

B11

#### Figures 6 and 10

Figures 6 and 10 are blurry, thus, it is unclear where individual components of the project would be located. Please provide legible project plans. Please also note that Commission staff may have additional comments following the receipt of readable site plans.

B12

#### Eelgrass Mitigation

Please indicate if the applicant has coordinated with the National Marine Fisheries Service (NMFS) on the eelgrass mitigation plan and provide concurrence if obtained.

B13

Finally, Section III Air Quality of the MND states: "Since the proposed Project is consistent with the projections assumed in the PMP, and the Ozone Plan and RAQS, construction and operation of the proposed Project would not conflict with or obstruct implementation of applicable air quality plans. No impacts are anticipated to occur, and no mitigation measures are required." However, the referenced projections were not incorporated into the PMP. Please correct.

B14

January 6, 2020  
Page 3

Thank you again for the opportunity to review and provide preliminary comments on the proposed project. If you have any questions or require further clarification, please do not hesitate to contact me at the above office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'ML' or 'Melody'.

Melody Lasiter  
Coastal Program Analyst  
California Coastal Commission

CC (via email):  
Deborah Lee (CCC)  
Kanani Leslie (CCC)  
Wileen Manaois (Port)

## RESPONSE TO COMMENT LETTER B

**Agency:** California Coastal Commission

**Commenter:** Melody Lasiter

**Date:** January 6, 2020

**Response to Comment B1:** This comment does not raise a significant environmental issue and no changes were made to the Draft IS/MND. However, a response to the comment regarding the “number and mix of boat slips” is included below:

The redesign of the project since public review has resulted in the number of slips increasing by three from the existing condition (from 620 to 623). The proportion of large boat slips (greater than 51 feet) is now approximately the same as medium slips (26–30 feet). Large boat slips account for 11.55% of the proposed slip inventory and medium boat slips account for 12.52%. Therefore, coastal staff's concerns have been addressed through the project redesign, and changes were made to the Draft IS/MND project description and analysis accordingly.

The proposed slip mix attempts to have a more balanced inventory of slip sizes. HIWM's existing slip inventory of 620 slips has over 53% of the slip inventory in the narrow range of 30 to 35 feet. It is a 1970s slip mix and is not consistent with the current demand. The revised slip mix has 31.3% of the slip inventory in the 31- to 35-foot range. San Diego marinas have a total of approximately 2,392 slips in the 30- to 35-foot range, which represents about 37% of the 6,518 total slip inventory (see Attachment B-1, *San Diego Slip Inventory 2017*). Therefore, the revised slip mix would align better with current demand as well as the overall slip inventory for San Diego Bay for the 30- (31-) to 35-foot range.

Historical marina vacancy in the 30- to 35-foot range has the highest vacancy rate for the last 10 years (see Attachment B-2, *HIWM Vacancy Summaries 2010–2019*). These summaries show that the 30- to 35-foot slip has the highest vacancy rate. Harbor-wide vacancy data is included as Attachment B-3, *San Diego Bay Marina Occupancy*. This data is from a periodic survey that HIWM conducts with San Diego marina dockmasters. Attachment B-3 includes a survey from October of 2013 and a survey from October 2019. The 2013 survey represents a period of time when the slip rental market was fairly slow, and there were many vacancies. The 2019 survey represents a period of time when the slip rental market was fairly strong and overall vacancies were fairly low. For both slow and strong demand periods the bulk of the vacancies were in the 30- to 35-foot slip range. Even during the strong slip rental market (2019), over 200 of the 30- to 35-foot slips were vacant in the San Diego area.

Larger slip sizes have historically very low vacancy rates both in the HIWM marina as well as harbor-wide. On average, it is estimated that the HIWM office receives at least two inquiries/requests for larger slip rentals every day, which cannot currently be accommodated, indicating there is a demand for larger slip sizes within their inventory.

The proposed slip mix accomplishes the following:

- Adds to the inventory of under-25-foot slips to allow even more opportunity for public access and entry-level water sport activity.
- Creates a more balanced slip mix, which adds to the economic viability of the project.
- Adds inventory in the larger slip sizes where there is demand and the market is underserved.
- Creates operational and business flexibility for future operations. This stems from the premise that when vacancies exist, a smaller boat can always be put in a bigger slip but a bigger boat can never be put in a smaller slip.

The District has made the following revisions to the Draft IS/MND to reflect the revised slip mix:

*MND, Section II, Project Description:*

“Demolition of 146,000 square feet of existing docks providing 620 boat slips and construction of 139,218 ~~140,000~~ square feet of new docks providing 623 boat slips; and...”

*MND, Executive Summary and IS Section 1.2, Introduction:*

“The proposed Project includes the following components: (1) demolition of 146,000 square feet of existing docks (providing 620 boat slips); (2) new construction of 139,218 ~~140,000~~ square feet of new docks (providing 623 ~~603~~ boat slips); ...”

*MND, Section II, Project Description and IS Section 2, Project Characteristics:*

“Demolition of 146,000 square feet of existing docks providing 620 boat slips and construction of 139,218 ~~140,000~~ square feet of new docks providing 623 ~~603~~ boat slips; and...”

*MND Table 2 and IS Table 2—Existing Conditions and Proposed Waterside Improvements Summary, within the “Boat Slips” row:*

Project Component	Existing Conditions		Proposed Improvements		Change from Existing Conditions
Boat Slips	620	--	<u>623</u> <del>603</del>	--	Increase of 3 <del>Decrease of 17</del> boat slips

*MND Section II.B., Waterside Improvements and Section 2.1.2, Waterside Improvements:*

“The proposed changes to the dock and slip configuration would result in an increase in slips ~~reduction in the overall size of the current dock facility from 146,000 square feet to 140,000 square feet (a 6,000 square foot reduction in bay coverage), and approximately 17 fewer slips (from 620 slips to 623 ~~603~~ slips).~~”

*MND Table 3 and IS Table 3—Proposed Slip Mix Summary:*

Slip Range	Existing		Proposed	
	Slip Quantity	% of Total Slip Inventory	Slip Quantity	% of Total Slip Inventory
12 – 20 feet	0	0%	<u>57</u> <del>32</del>	<u>9.5</u> <del>5.14</del> %
21 – 25 feet	96	15.5%	<u>106</u> <del>115</del>	<u>17.6</u> <del>18.45</del> %
26 – 30 feet	111	17.9%	<u>55</u> <del>72</del>	<u>9.4</u> <del>11.55</del> %
31 – 35 feet	231	37.3%	<u>174</u> <del>195</del>	<u>28.9</u> <del>31.30</del> %
36 – 40 feet	106	17.1%	<u>73</u> <del>19</del>	<u>12.1</u> <del>3.05</del> %
41 – 45 feet	9	1.5%	<u>28</u> <del>44</del>	<u>4.6</u> <del>7.06</del> %
46 – 50 feet	44	7%	<u>44</u> <del>68</del>	<u>7.3</u> <del>10.91</del> %
Greater than 51 feet	23	3.7%	<u>66</u> <del>78</del>	<u>10.9</u> <del>12.52</del> %
<b>Total</b>	<b>620</b>	<b>--</b>	<b><u>603</u><del>623</del></b>	<b>--</b>

Source: HIW 2021<sup>148</sup>

*MND Section II.C., New Lease and IS Section 2.1.3, New Lease:*

“The uses in the lease would allow HIW Associates, LP to construct, operate, and maintain a recreational marina with 623 ~~603~~ boat slips along with associated ancillary facilities ...”

*IS Section 2.1.5, Operation:*

"Given the proposed decrease in the total building square footage and slight ~~reduction~~increase in the number of boat slips, both employees and visitors accessing and using the Project site are expected to be similar to the existing condition."

*IS Section 4, Environmental Initial Study Checklist in response to III.b.:*

~~"Because While~~ the proposed Project would ~~reduce~~slightly increase the number of boating slips, emissions of all pollutants ~~except NO<sub>x</sub>~~ from recreational boating and onroad visitor trips would decrease slightly for VOC, CO, and PM<sub>2.5</sub>; result in no change for PM<sub>10</sub>; and slightly increase for NO<sub>x</sub> under the Project, relative to existing conditions, as shown in Table 8."

*Table 8—Summary of Phase I Operational Emissions (pounds per day), within footnote 4:*

"While the project would only increase boating slips by three slips, more slips for larger boats (36 feet to greater than 51 feet) will be allowed. In general, larger boats have a higher emissions intensity per operating hour than smaller vessels."

*IS Section 4, Environmental Initial Study Checklist in response to III.c.:*

"Once operational, the proposed Project is not expected to ~~in~~-increase visitation or intensity of uses at the Project site because waterside marina usage drives use of landside marina facilities, and the number of marina slips is only increasing by three~~decreasing~~; therefore, operation of the proposed Project over the next ~~5040~~ years would not result in an increase in DPM emissions (refer to Table 8)."

*IS Section 4, Environmental Initial Study Checklist in response to IV.b.:*

"Given the larger slip sizes proposed, there will be an overall increase in eelgrass shading due to the operational impacts. The existing combined dock and slip area was calculated to be 41,244 square meters (443,947 square feet) in the 2022 Harbor Island West Marina Updated Eelgrass Resources and Impact Report (Appendix B1) that examined the spatial distribution of eelgrass relative to depths and shading within the marina assuming 100% slip occupation. The proposed combined dock and slip area would measure 47,366 square meters (509,843 square feet). This increase in total ~~reduction of~~ over water coverage was evaluated as part of an eelgrass impact assessment the 2022 Eelgrass Resources and Impact Report (Appendix B1)."

*IS Section 4, Environmental Initial Study Checklist in response to X.a.:*

"The proposed project would result in an ~~reduction~~increase of on-site boat slips by three slips."

*Table 18—Land Use Consistency, within the "Port Master Plan" row:*

"The project is consistent with these land and water use designations because it would redevelop the existing marina into a new marina with three more ~~slightly less~~ vessel slips than existing and a smaller building."

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 3 "30224 Recreational boating use; encouragement; facilities":*

"Although the project would ~~not only~~ increase the size or capacity of the marina by three slips, it would also increase the range of available boat slip sizes as well as improve accessibility and improve fire safety at the marina."

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 3 "30234 Commercial fishing and recreational boating facilities":*

"The project would reduce the size of the landside facility and increase by three slips the size of the waterside facility to meet the anticipated future demand, but would not interfere with the needs of the commercial fishing industry."

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 3 “30252 Maintenance and enhancement of public access”:*

“Since the project does not involve an increase in size ~~or~~ and only a small three-slip increase in capacity of the existing marina, the proposed parking would be sufficient to support the project.”

*IS Section 4, Environmental Initial Study Checklist in response to XIV.a.:*

“Operation of the proposed Project would not result in an increase in the local population as there would be a reduction in total building area and a negligible increase (three) in the number of boat slips compared to existing conditions.”

*IS Section 4, Environmental Initial Study Checklist in response to XVII.a.:*

“Once the proposed Project is operational, the smaller building ~~and slightly fewer vessel slips~~ and negligible increase in slip number (increase of three) would lead to no change or a small reduction in the number of ADTs currently generated at the Project site as boaters are the main users of the marina facilities.”

*IS Section 4, Environmental Initial Study Checklist in response to XVII.d.:*

“For these reasons, ingress and egress to Harbor Island Drive would not be hindered in any way by the proposed Project, and Project traffic generation would ~~decrease~~ remain approximately the same compared with the existing condition due to the reduction in total building area and negligible increase in the number of slips on the site compared to existing conditions.”

*IS Section 4, Environmental Initial Study Checklist in response to XVII.e.:*

“Moreover, the proposed Project would decrease the amount of current building space from approximately 23,000 square feet to 15,682 square feet while the number of slips would ~~decrease~~ increase negligibly from 620 to 603–623, which could reduce the such that parking demand proportionately would remain approximately the same as the existing condition.”

**Response to Comment B2:** This comment does not raise a significant environmental issue, and no changes were made to the MND. However, a response to the comment regarding the “existing utilization of slips by size at HIWM” is included below:

Attachment B-2, *HIWM Vacancy Summaries 2010–2019*, provided by HIWM shows existing utilization of slips by size for HIWM. The data indicate under-utilization of the current slip configuration. Please also refer to Response B1.

**Response to Comment B3:** This comment does not raise a significant environmental issue, and no changes were made to the MND. However, a response to the comment regarding the existing utilization of slips by size at San Diego Bay is included below:

Attachment B-3, *San Diego Bay Marina Occupancy Data*, provided by HIWM shows existing utilization of slips by size for San Diego Bay. Please also refer to Response B1.

Comments B4, B5, and B6 do potentially raise a significant environmental issue. A response to the comments regarding “lighting” is included below. Based on the information provided in these responses, no changes were made to the MND.

**Response to Comment B4:** Attachment B-4, *Lighting*, provides a photometric analysis of the lights proposed for the parking lot. The proposed parking lot lighting includes 16 “tsunami series-LED” lights mounted on 25-foot-high poles. Each light consists of 80 light-emitting diode (LED) lamps with 159 lumens per lamp. There is a light loss factor of 0.8 and a wattage of 251 watts.

**Response to Comment B5:** Analysis of lighting for the lower lumen output of 3,000K shows the minimum amount of lighting needed for safety and security is 16 lights in the parking lot. The analysis is based on a point-by-point calculation performed with lighting software commonly used in the industry.

**Response to Comment B6:** Operating characteristics of lights have been designed to decrease the impacts of lighting. The fixtures used meet IES standards for full cut off. Large pole fixtures will have a motion sensor and will be at 50% when there is no one present. All of the light fixtures in this design utilize 3000K LEDs, are full cutoff, and are shielded for any spill, as indicated in the point-by-point study (Attachment B-4).

Deck light fixtures would be at such a low light level that they do not require motion sensors. If motion sensors for dock lighting were included, light levels would be too low for visual access. Similarly, any landscape lighting would be such a low light level that it would not contribute to the parking lot lights.

**Response to Comment B7:** This comment does not raise a significant environmental issue, and only clarifying changes were made to the MND. A response to the comment regarding the “Bay Fill” is included below:

The redesign of the project since public review resulted in the total number of piles decreasing by 89 from current conditions (326 to 237) and the pile area decreasing by 5 square feet. As a result, there would be no net fill impacts due to removal and replacement of marina pilings.

For clarifying purposes, the District has made the following minor revisions to the Draft IS/MND. These minor revisions do not alter the significance determination provided in the Draft IS/MND.

*IS Section 4, Environmental Initial Study Checklist in response to IV.c.:*

“There are no net fill impacts due to removal and replacement of marina pilings.”

*Table 18—Land Use Consistency, within the “Port Master Plan Goal 5” row:*

“The project involves a 5040-year lease to operate the proposed redeveloped marina facility. No dredging or net fill is proposed within the bay.”

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 3 “30230 Marine resources; maintenance” row:*

“No dredging or net fill would occur within the bay.”

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 3 “30233 Diking, filling or dredging; continued movement of sediment and nutrients” row:*

“The project does not involve net fill or dredging, including dredging within wetlands or estuaries or the construction of erosion or flood control facilities, as described in Section IV, *Biological Resources*.”

*Table 18—Land Use Consistency, within the California Coastal Act – Chapter 8 “30705 Diking, filling or dredging water areas” row:*

“Replacement of old piles with new piles for this recreational boating facility would have zero net fill impacts.”

**Response to Comment B8:** Please refer to Response B7 above describing how there would be no net fill impacts due to removal and replacement of marina pilings.

**Response to Comment B9:** The public promenade is expected to have a design elevation of approximately 10.4 feet above mean sea level (MSL). The potential impacts of sea level rise (SLR) and storm surge on the public promenade are presented in Table RTC-2. Similar to other components of the project site, the promenade is not expected to experience any coastal flooding within the lifetime of the lease (2070). When considering SLR out to 2100, it is possible that the public promenade could experience

temporary flooding during a 100-year storm in 2100 if sea levels rise 7 feet (currently estimated at a 0.5% probability of occurrence<sup>1</sup>) given the elevation of Harbor Island as a whole.

**Table RTC-2. Projected Sea Level Rise Conditions**

Year	Existing Tidal Datum <sup>1</sup>		Sea Level Rise Projection <sup>2</sup>		Project Elevation Relative to Projections – Permanent SLR <sup>3</sup>		Project Elevation Relative to Projections with Storm Surge – Temporary SLR <sup>4</sup>	
	Site Elevation Above MSL	MHHW Elevation Above MSL	Low Risk	Medium-High Risk	Low Risk	Medium-High Risk	Low Risk	Medium-High Risk
2030	12.0	2.8	0.6	0.9	8.6	8.3	6.2	5.9
2070	12.0	2.8	2.0	3.6	7.2	5.6	4.8	3.2
2100	12.0	2.8	3.6	7.0	5.6	2.2	3.2	-0.2

<sup>1</sup> Mean Higher High Water (MHHW) Elevation above MSL calculated based on the difference between MHHW (5.72 feet) and MSL (2.94 feet). Obtained from: <https://tidesandcurrents.noaa.gov/datums.html?id=9410170>.

<sup>2</sup> Based on projections for San Diego. Obtained from: [https://documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf).

<sup>3</sup> Based on the difference between site elevation, MHHW Elevation above MSL, and sea level rise projections. For example, the lower end elevation for 2030 is calculated as follows:  $12.0 - 2.8 - 0.6 = 8.6$  feet.

<sup>4</sup> Based on the addition of the 100-year (1% annual exceedance probability) surge events on top of the projected permanent SLR (relative to MHHW). For example, the low risk elevation for 2030 is calculated as follows:  $8.6 - 2.4 = 6.2$  feet. This assumes that future storm surges above MHHW are similar to historical surge.

Note that this table does not take into account the SLR between 2000 (baseline for SLR projects) and 2018 (existing levels used for calculations). The mean sea level trend is 2.17 millimeters/year (or 0.09 inch/year). Accounting for this change would reduce the project elevation relative to the water levels by approximately 0.1 feet. See: [https://tidesandcurrents.noaa.gov/sltrends/sltrends\\_station.shtml?id=9410170](https://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=9410170).

Under the medium-high risk 2100 storm event scenario there would be widespread flooding on Harbor Island, including potential flooding of the access roads to the project site. This indicates that the public would not be accessing the promenade during such a storm event and that a larger long-term adaptive management plan for the Island may be necessary. Such a plan is outside the purview of the redevelopment of this particular project site.

**Response to Comment B10:** A visual identifying potential impacts associated with 0.75 and 2 meters of SLR is provided in Figure 1. However, the U.S. Geological Survey (USGS) CoSMOS<sup>2</sup> modeling used to create this figure also shows flooding of structures on the project site under today's conditions (i.e., no sea level rise and no storm conditions), which indicates that the results for this project site are not reliable. USGS specifically states that the accuracy is not appropriate for site-level planning, and there is no reason to assume that the elevations used in the CoSMoS modeling are more accurate than the survey elevations provided by the project sponsor.

<sup>1</sup> California Ocean Protection Council. 2018. *State of California Sea-Level Rise Guidance*. Available: [http://www.opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20180314/Item3\\_Exhibit-A\\_OPC\\_SLR\\_Guidance-rd3.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf).

<sup>2</sup> Information on the USGS CoSMoS modeling is available at: [https://www.usgs.gov/centers/pcm/science/coastal-storm-modeling-system-cosmos?qt-science\\_center\\_objects=0#qt-science\\_center\\_objects](https://www.usgs.gov/centers/pcm/science/coastal-storm-modeling-system-cosmos?qt-science_center_objects=0#qt-science_center_objects).





Figure 1  
Sea-Level Rise Map  
Harbor Island West Marina Redevelopment Project

**Response to Comment B11:** This comment provides rationale as to why additional public parking spaces should be included in the project. In response to this comment, the project description has been revised to increase parking spaces from 4 to 12 available to the public. The following minor revisions to the Draft IS/MND do not alter significance findings:

*MND Table 1. Existing Conditions and Proposed Landside Improvements Summary within the “Parking Spaces/Changes in Existing Conditions” row/column:*

“Increase in 29 parking spaces (12 available to the public)”

*IS Section 2.1.1 Landside Improvements:*

“The existing asphalt parking lot would be demolished and repaved, resulting in a decrease from 120,000 square feet to 116,000 square feet of pavement area but an increase in 29 parking spaces, from 351 to 380. ~~Up to four~~ Twelve spaces would be available to the public.”

*Table 33. Parking Demand and Parking Requirement Factors within the “Price of Parking/Applicability to the Proposed Project” row/column:*

“Based on preliminary site design, approximately ~~352-368~~ parking spaces would be utilized for marina users while approximately ~~28-12~~ parking spaces would be open public parking. Therefore, no charges for parking are included.”

*Table 33. Parking Demand and Parking Requirement Factors within the “Public Bay Access/Applicability to the Proposed Project” row/column:*

“The proposed Project would increase the number of parking spaces to a total of 380 parking spaces of which HIW will dedicate approximately ~~28-12~~ parking spaces for free public use.”

**Response to Comment B12.** This comment does not raise a significant environmental issue. However, figures were replaced in the MND to increase legibility.

Figures 6 and 10 have been recreated to reduce blur and are included in the Final MND in Attachment A, *Initial Study/Environmental Checklist for the Harbor Island West Marina Redevelopment Project*. The replacement of these figures does not alter significance findings.

**Response to Comment B13:** This comment does not raise a significant environmental issue. However, a response to the comment regarding the eelgrass mitigation plan is included below.

The development of an eelgrass mitigation plan is a mitigation measure (MM-BIO-4). In accordance with MM-BIO-4, the eelgrass mitigation plan is not required to be developed until prior to in-water construction work and “The mitigation plan shall be submitted to the District’s Environmental Conservation Department and resource agencies (NMFS and CDFW) for approval 60 days prior to initiation of waterside project activities.”

In-water construction has not begun, and, therefore, coordination with the National Marine Fisheries Service (NMFS) has not yet taken place and concurrence not yet obtained. However, it should be noted that an Updated Eelgrass Resources and Impact Report and Eelgrass Mitigation Plan have been prepared in association with the Project’s Coastal Development Permit which have been included as Appendix B1 and Appendix B2 to the IS, respectively. The following minor revisions to the Draft IS/MND do not alter significance findings:

*IS Section 4, Environmental Initial Study Checklist in Environmental Setting of IV. Biological Resources:*

"The environmental setting description for biological resources is based on a comprehensive database review, a site visit by an ICF biologist, and the Harbor Island West Marina Marine Updated Baseline Eelgrass Resources Report, Harbor Island West Marina Updated Eelgrass Resources and Impact Report (2022), and Harbor Island West Marina Marine Biological Resources Report, ~~both~~ all prepared by Marine Taxonomic Services, Ltd. ~~on April 2, 2018~~ (Appendix B, B1, and C)."

*IS Section 4, Environmental Initial Study Checklist in response to IV.b.:*

"As identified in the Harbor Island West Marina ~~Marine Updated Eelgrass Resources and Impact Report as revised on January 28, 2022~~ Baseline Eelgrass Resources Report (Appendix B1), the waterside of the Project site has eelgrass habitat present."

"The existing combined dock and slip area was calculated to be 41,244 square meters (443,947 square feet) in the 2022 Harbor Island West Marina Updated Eelgrass Resources and Impact Report (Appendix B1) that examined the spatial distribution of eelgrass relative to depths and shading within the marina assuming 100% slip occupation. The proposed combined dock and slip area would measure 47,366 square meters (509,843 square feet). This increase in total reduction of over water coverage was evaluated as part of an eelgrass impact assessment the 2022 Eelgrass Resources and Impact Report (Appendix B1)."

**Response to Comment B14:** This comment concerns a clarification in the "Air Quality" analysis discussion. A minor revision to the Draft IS/MND for clarity does not alter significance findings. The conclusions in Section III, *Air Quality*, of the Initial Study to the analysis of question a) has been revised in accordance with this comment as follows:

"Since the proposed Project is consistent with the projections assumed in the PMP, and the Ozone Plan and RAQS, construction and operation of the proposed Project would not conflict with or obstruct implementation of applicable air quality plans. No impacts are anticipated to occur, and no mitigation measures are required."

## Attachment B-1

## San Diego Marina Slip Inventory

[illegible]

Attachment B-1

San Diego Marina Slip Inventory

85'	86'	88'	90'	92'	93'	94'	95'	96'	98'	100'	106'	110'	113'	120'	138'	139'	140'	178'	190'	200'	210'	ET	Total
												1							1				155
											19												188
																							102
			1																				171
																							0
	5	4	3	3		3		3	2	4	2	1			1		2			2	1		502
																							36
																							125
					1					4		1						1					51
0	5	4	4	3	1	3	0	3	2	8	2	22	0	0	1	0	2	1	1	2	1	0	1330
			1							4													620
		2		1												1							411
																							547
																							48
1			2				1			1													551
																							439
1	0	2	3	0	1	0	1	0	0	5	0	0	0	0	0	1	0	0	0	0	0	0	2615
																							2616
																							351
																							439
			1																				250
																							75
			1									1		1	1		1						81
																							264
0	0	1	1	0	0	0	0	0	0	0	0	1	0	1	1		1	0	0	0	0	0	1460
																					20		95
																					9		187
																					23		634
																					2		197
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0	0	0	0	0	54	1113
1	5	7	8	3	2	3	1	3	2	13	2	23	0	1	2		3	1	1	2	1	54	6518



## Attachment B-2

Harbor Island West Marina Slip Vacancy History 2010-2019

2010													
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	12	14	13	10	9	5	2	3	4	10	10	10	9
25'	0	0	0	0	1	0	0	1	0	0	1	1	0
30'	7	7	5	7	5	4	1	2	6	9	11	14	7
32'	11	12	9	8	6	8	9	12	10	12	16	23	11
35'	8	7	11	13	16	16	18	15	16	19	23	24	16
40'	8	13	10	11	11	13	9	9	5	8	5	8	9
45'	0	0	0	0	0	0	0	0	0	0	0	0	0
50'	4	2	1	0	1	1	3	1	2	2	1	4	2
55'	0	0	0	0	0	0	0	1	2	1	0	2	1
56'+	0	0	0	0	0	0	0	0	0	0	0	1	0
Total	50	55	49	49	49	47	42	44	45	61	67	87	54
2011													
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	12	13	12	10	8	8	7	6	6	5	9	9	9
25'	0	1	2	2	0	1	0	0	1	1	1	2	1
30'	12	12	12	11	11	10	8	11	11	14	15	18	12
32'	23	20	22	22	19	21	18	16	19	20	20	21	20
35'	27	28	23	18	15	17	16	17	18	27	26	28	22
40'	8	10	9	9	6	3	4	7	4	7	28	8	9
45'	0	0	0	0	0	0	0	0	0	0	0	0	0
50'	2	2	4	6	7	9	9	6	2	0	4	5	5
55'	1	0	0	0	0	0	0	0	0	0	0	0	0
56'+	2	1	1	0	0	0	0	0	0	0	0	0	0
Ttl	87	87	85	78	66	69	62	63	61	74	103	91	77
2012													
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	12	13	13	16	13	9	9	8	7	9	9	11	11
25'	2	2	2	0	1	2	1	0	1	1	3	4	2
30'	18	17	17	18	18	18	11	10	10	11	12	12	14
32'	22	22	20	21	18	13	8	9	11	10	11	15	15
35'	28	26	29	22	22	22	22	12	20	18	25	26	23
40'	7	8	6	4	7	4	3	6	6	10	13	14	7
45'	0	0	0	0	0	1	0	0	0	0	0	0	0
50'	4	4	6	4	0	1	1	1	3	3	4	3	3
55'	0	0	0	1	0	0	0	0	0	0	0	1	0
56'+	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	93	92	93	86	79	70	55	46	58	62	77	86	75
2013													
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	12	11	8	6	9	5	4	3	5	5	7	7	7
25'	5	6	3	2	3	0	1	1	0	2	3	5	3
30'	13	15	14	11	14	12	11	8	13	16	16	15	13
32'	15	16	17	17	15	11	11	7	10	12	13	15	13
35'	26	27	28	31	34	25	25	26	27	26	34	39	29
40'	16	17	17	13	12	9	8	8	6	6	7	10	11
45'	0	0	0	0	0	0	0	0	0	0	0	0	0
50'	2	3	2	1	1	0	0	0	1	0	0	0	1
55'	0	0	0	1	1	0	0	0	0	0	0	0	0
56'+	0	0	1	1	0	0	2	2	1	0	0	1	1
Total	89	95	90	83	89	62	62	55	63	67	80	92	77
2014													
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	8	8	9	7	4	2	2	2	2	5	8	9	6
25'	4	6	3	4	1	2	1	0	3	5	6	9	4
30'	18	17	16	17	17	9	11	7	5	8	9	15	12
32'	15	17	21	20	20	16	14	6	11	17	25	28	18
35'	35	37	35	36	28	23	18	14	19	17	25	25	26
40'	9	9	14	14	12	7	4	1	1	0	2	5	7
45'	0	0	0	0	0	0	0	0	0	0	0	0	0
50'	0	0	0	0	1	0	0	0	0	0	0	1	0
55'	0	0	0	0	0	0	0	0	0	0	0	0	0
56'+	1	1	1	2	0	0	1	0	1	0	1	1	1
Ttl	90	95	99	100	83	59	51	30	42	52	76	93	73

## Attachment B-2

Harbor Island West Marina Slip Vacancy History 2010-2019

	2015												
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	10	9	9	8	2	3	4	2	1	1	1	1	4
25'	8	5	0	2	0	1	1	0	0	0	1	0	2
30'	15	13	10	8	8	5	4	6	8	7	11	12	9
32'	28	27	25	26	21	13	12	1	2	4	6	8	14
35'	28	27	25	26	23	15	14	11	10	13	22	22	20
40'	6	6	4	3	0	0	1	1	1	1	1	2	2
45'	0	0	0	0	1	0	0	0	0	0	0	0	0
50'	0	0	0	0	0	0	0	0	0	0	0	1	0
55'	0	0	0	0	0	0	1	0	0	0	0	0	0
56'+	0	0	1	2	1	1	0	0	0	0	0	0	0
Total	95	87	74	75	56	38	37	21	22	26	42	46	52

	2016												
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	2	5	3	5	4	1	1	2	2	3	6	9	4
25'	0	0	0	0	0	1	3	2	2	4	7	6	2
30'	13	14	10	8	4	1	1	2	3	5	5	4	6
32'	15	16	16	15	11	3	2	3	6	7	8	10	9
35'	26	26	25	22	20	7	11	11	14	12	18	18	18
40'	4	4	2	3	3	1	1	0	2	3	1	3	2
45'	0	0	0	0	0	0	0	0	0	0	0	0	0
50'	0	0	0	0	0	0	0	0	1	0	1	1	0
55'	0	0	0	0	0	0	0	0	0	0	0	0	0
56'+	0	0	0	0	0	0	0	0	0	0	1	1	0
Total	60	65	56	53	42	14	19	20	30	34	47	52	41

	2017												
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	8	10	12	11	6	2	0	1	3	4	5	8	6
25'	4	4	1	3	2	0	0	0	0	4	7	7	3
30'	5	4	5	3	4	3	1	0	2	1	2	7	3
32'	11	11	14	11	5	5	3	1	4	8	11	14	8
35'	18	18	15	16	8	11	6	3	6	6	12	11	11
40'	0	2	4	1	1	1	1	0	2	2	4	2	2
45'	0	1	1	0	0	0	0	0	1	0	0	0	0
50'	0	2	0	0	0	0	0	0	0	1	2	2	1
55'	0	0	0	0	0	0	0	0	0	0	0	0	0
56'+	1	2	1	0	0	0	0	0	0	0	0	1	0
Ttl	47	54	53	45	26	22	11	5	18	26	43	52	34

	2018												
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	10	8	6	6	5	1	1	1	1	3	5	7	5
25'	4	1	2	5	0	0	0	0	2	1	1	2	2
30'	6	4	4	4	3	2	2	5	8	8	11	13	6
32'	15	18	18	19	14	4	10	10	13	14	15	25	15
35'	11	12	10	14	9	2	4	6	8	10	13	14	9
40'	0	2	1	4	3	3	0	1	1	2	0	2	2
45'	2	0	0	1	1	0	0	0	0	0	0	0	0
50'	5	4	0	1	0	0	0	0	0	0	0	0	1
55'	0	0	0	0	0	0	0	0	0	0	0	0	0
56'+	0	0	0	0	0	0	0	0	0	0	1	1	0
Total	53	49	41	54	35	12	17	23	33	38	46	64	39

	2019												
	1	2	3	4	5	6	7	8	9	10	11	12	Avg
21'	7	8	5	3	3	3	3	1	1	3	4	7	4
25'	0	0	0	0	2	2	0	1	1	2	4	5	1
30'	9	7	7	5	5	3	2	3	5	6	6	8	6
32'	27	26	28	20	10	11	4	4	9	10	17	23	16
35'	19	16	19	19	15	20	13	9	10	9	17	19	15
40'	5	4	4	1	1	3	2	0	0	2	3	3	2
45'	0	0	0	0	0	0	0	0	0	0	1	0	0
50'	0	0	0	0	0	1	0	0	0	0	1	0	0
55'	0	0	0	0	0	0	0	0	0	0	0	0	0
56'+	1	1	3	0	0	1	0	0	1	0	0	0	1
Total	68	62	66	48	36	44	24	18	27	32	53	65	45

## Attachment B-2

## San Diego Marina Occupancy October 2013

	25'	30'	35'	40'	45'	50'	55'	60'	65'	70'	70+	Total	Slips	%	Occ	%	TOTAL
<b>HARBOR ISLAND/DOWNTOWN</b>																	
Cabrillo Isle Marina 619-297-6222	0	39	55	6	20	4	0	1	0	0	3	128	435	29%	307	71%	128
Harbor Island West 619-291-6440	2	28	26	0	0	0	0	0	0	0	0	56	590	9%	534	91%	56
Marina Cortez 619-291-5985	4	26	28	12	0	8	0	0	0	0	0	78	513	15%	435	85%	78
Marriott 619-230-8955	0	0	5	8	0	0	0	0	0	0	0	13	439	3%	426	97%	13
Sheraton 619-692-2249	0	0	0	0	0	0	0	0	0	0	0	0	48	0%	48	100%	0
Sunroad Marina 619-574-0736	0	8	24	15	12	8	0	0	0	0	3	70	545	13%	475	87%	70
<b>H.I. VACANCY TOTAL</b>	<b>6</b>	<b>101</b>	<b>138</b>	<b>41</b>	<b>32</b>	<b>20</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>6</b>	<b>345</b>	<b>2570</b>	<b>13%</b>	<b>2225</b>	<b>87%</b>	<b>345</b>
<b>SHELTER ISLAND</b>																	
Bay Club Marina 619-222-0314	0	0	0	0	0	0	0	0	0	0	0	0	150	0%	150	100%	0
Gold Coast 619-222-4255	0	0	0	1	1	1	0	0	0	0	2	5	35	14%	30	86%	5
Half Moon Anchorage 619-224-3411	3	0	2	2	0	3	0	0	0	0	0	10	180	6%	170	94%	10
Intrepid Landing 415-233-3198	0	0	0	0	0	0	0	0	0	0	0	0	36	0%	36	100%	0
Kona Kai Marina 619-224-7547	0	0	7	8	8	10	3	3	4	1	2	46	502	9%	456	91%	46
Point Loma Marina 619-718-6260	0	0	0	0	0	0	0	0	0	0	0	0	51	0%	51	100%	0
Shelter Cove Marina 619-224-2471	3	3	6	0	1	0	1	0	5	0	0	19	155	12%	136	88%	19
Shelter Island Marina 619-223-0301	0	0	0	0	0	0	0	0	0	0	0	0	188	0%	188	100%	0
Sun Harbor Marina 619-222-1167	0	0	0	1	8	0	0	0	0	0	0	9	125	7%	116	93%	9
<b>S.I. VACANCY TOTAL</b>	<b>6</b>	<b>3</b>	<b>15</b>	<b>12</b>	<b>18</b>	<b>14</b>	<b>4</b>	<b>3</b>	<b>9</b>	<b>1</b>	<b>4</b>	<b>89</b>	<b>1422</b>	<b>6%</b>	<b>1333</b>	<b>94%</b>	<b>89</b>
<b>SOUTH BAY</b>																	
California Yacht Marina 619-422-2595	21	50	49	4	18	6	1	0	0	0	0	149	351	42%	202	58%	149
Chula Vista Marina 619-691-1860	22	4	58	11	6	1	0	0	0	0	0	102	552	18%	450	82%	102
Glorietta Bay 619-435-5203	0	0	0	0	0	0	0	0	0	0	0	0	75	0%	75	100%	0
Loews Marina 619-575-7245	0	0	0	0	0	0	0	0	0	0	1	1	81	1%	80	99%	1
Pier 32 Marina 619-477-3232	0	0	3	0	2	0	10	9	1	0	1	26	250	10%	224	90%	26
<b>S.B. VACANCY TOTAL</b>	<b>43</b>	<b>54</b>	<b>110</b>	<b>15</b>	<b>26</b>	<b>7</b>	<b>11</b>	<b>9</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>278</b>	<b>1309</b>	<b>21%</b>	<b>1031</b>	<b>79%</b>	<b>278</b>
<b>TTL S.D. VACANCIES</b>	<b>55</b>	<b>158</b>	<b>263</b>	<b>68</b>	<b>76</b>	<b>41</b>	<b>15</b>	<b>13</b>	<b>10</b>	<b>1</b>	<b>12</b>	<b>712</b>	<b>5301</b>	<b>13%</b>	<b>4589</b>	<b>87%</b>	<b>712</b>

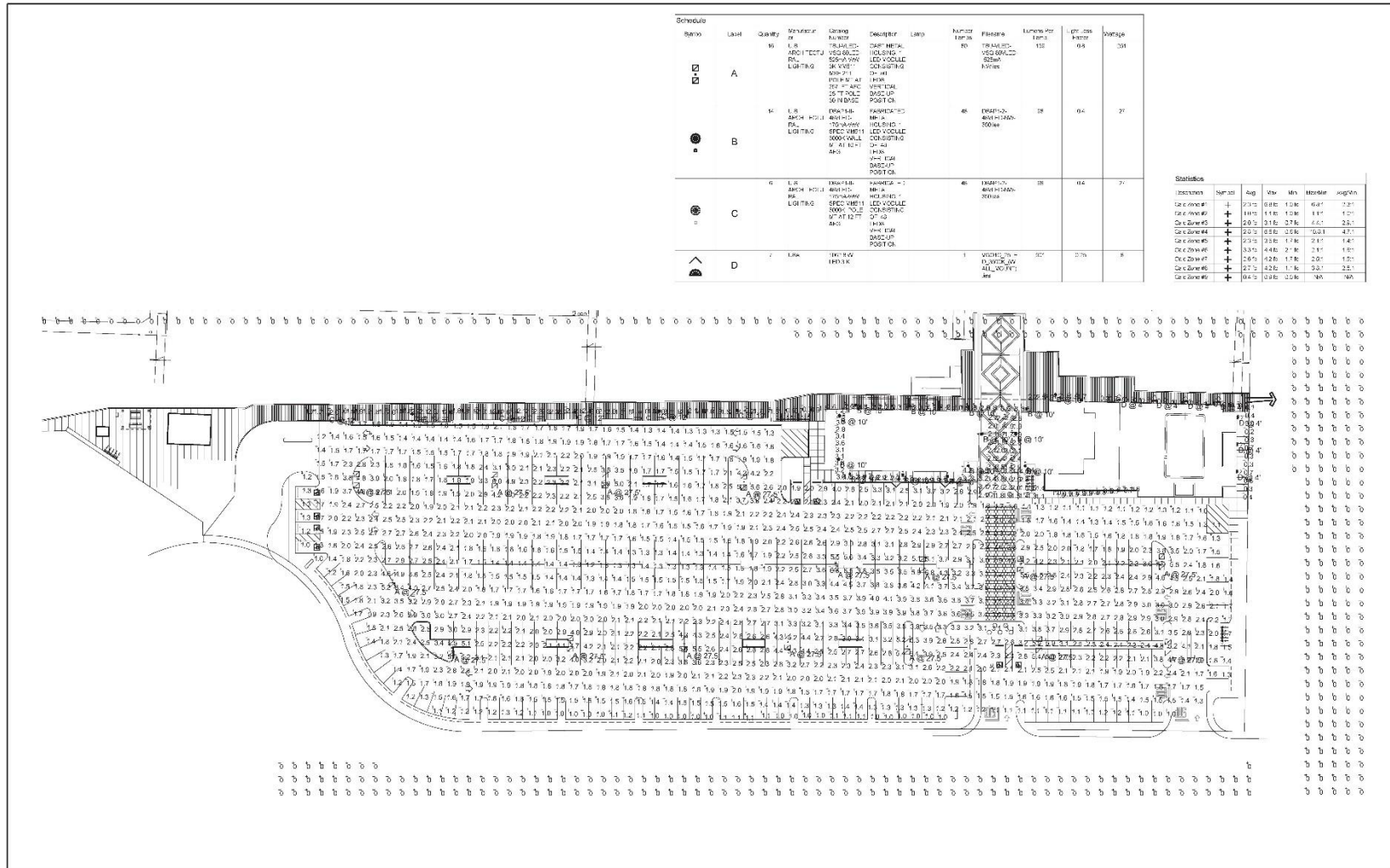


## Attachment B-3

## San Diego Marina Occupancy October 2019

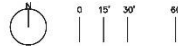
	25'	30'	35'	40'	45'	50'	55'	60'	65'	70'	70+	Total	Slips	%	Occ	%	TOTAL
<b>HARBOR ISLAND/DOWNTOWN</b>																	
Cabrillo Isle Marina 619-297-6222	0	6	7	0	0	0	0	0	0	0	2	15	435	3%	420	97%	15
Harbor Island West 619-291-6440	2	16	9	2	0	0	0	0	0	0	0	29	590	5%	561	95%	29
Marina Cortez 619-291-5985	1	18	6	1	0	0	0	0	0	0	0	26	513	5%	487	95%	26
Marriott 619-230-8955	0	2	12	7	0	0	0	0	0	0	0	21	439	5%	418	95%	21
Sheraton 619-692-2249	0	0	0	0	0	0	0	0	0	0	0	0	48	0%	48	100%	0
Sunroad Marina 619-574-0736	0	0	5	0	0	0	0	0	0	0	0	5	545	1%	540	99%	5
<b>H.I. VACANCY TOTAL</b>	<b>3</b>	<b>42</b>	<b>39</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>96</b>	<b>2570</b>	<b>4%</b>	<b>2474</b>	<b>96%</b>	<b>96</b>
<b>SHELTER ISLAND</b>																	
Bay Club Marina 619-222-0314	0	0	0	0	0	0	0	0	0	0	0	0	150	0%	150	100%	0
Gold Coast 619-222-4255	0	0	0	0	0	0	0	0	0	0	0	0	35	0%	35	100%	0
Half Moon Anchorage 619-224-3401	0	0	0	0	0	0	0	0	0	0	0	0	180	0%	180	100%	0
Intrepid Landing 619-269-7300	0	1	1	0	0	0	0	0	0	0	0	2	36	6%	34	94%	2
Kona Kai Marina 619-224-7547	0	0	0	0	0	0	0	0	0	0	0	0	502	0%	502	100%	0
Point Loma Marina 619-718-6260	0	0	0	0	0	0	0	0	0	1	0	1	51	2%	50	98%	1
Shelter Cove Marina 619-224-2471	5	3	0	0	0	0	0	0	0	0	0	8	155	5%	147	95%	8
Shelter Island Marina 619-223-0301	0	0	0	0	0	0	0	0	0	0	0	0	188	0%	188	100%	0
Sun Harbor Marina 619-222-1167	0	0	0	0	0	0	0	0	0	0	0	0	125	0%	125	100%	0
<b>S.I. VACANCY TOTAL</b>	<b>5</b>	<b>4</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>11</b>	<b>1422</b>	<b>1%</b>	<b>1411</b>	<b>99%</b>	<b>11</b>
<b>SOUTH BAY</b>																	
California Yacht Marina 619-422-2595	22	51	15	3	8	2	0	0	0	0	0	101	351	29%	250	71%	101
Chula Vista Marina 619-691-1860	25	6	43	1	1	0	0	0	0	0	0	76	552	14%	476	86%	76
Glorietta Bay 619-435-5203	0	0	0	0	0	0	0	0	0	0	0	0	75	0%	75	100%	0
Loews Marina 619-575-7245	0	0	0	0	0	0	0	0	0	0	0	0	81	0%	81	100%	0
Pier 32 Marina 619-477-3232	0	0	0	0	0	0	0	1	0	0	0	1	250	0%	249	100%	1
<b>S.B. VACANCY TOTAL</b>	<b>47</b>	<b>57</b>	<b>58</b>	<b>4</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>178</b>	<b>1309</b>	<b>14%</b>	<b>1131</b>	<b>86%</b>	<b>178</b>
<b>TTL S.D. VACANCIES</b>	<b>55</b>	<b>103</b>	<b>98</b>	<b>14</b>	<b>9</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>285</b>	<b>5301</b>	<b>5%</b>	<b>5016</b>	<b>95%</b>	<b>285</b>

# Attachment B-4



CLIENT: BEAUCHAMP REALTY

HARBOR ISLAND WEST MARINA  
San Diego, California



PRELIMINARY SITE LIGHTING PHOTOMETRIC

THIS DRAWING, AREA DELINEATION AND SUMMARIES, HARDWARE / LANDSCAPE AREAS ARE PRELIMINARY AND SUBJECT TO ADJUSTMENT. ANY PROPOSED DEVELOPMENT IS SUBJECT TO THE APPROVAL OF CLIENT AND GOVERNMENTAL AGENCIES. ALL DIMENSIONS AND SITE CONDITIONS ARE SUBJECT TO VERIFICATION.

002420

AO  
Architecture.  
Design.  
Relationships.

CLIENT: BEAUCHAMP REALTY

CUT SHEETS

02.24.20

**AO**  
Architecture.  
Design.  
Relationships.

## **I. INTRODUCTION**

### **A. Purpose of a Negative Declaration**

CEQA Section 21064 defines a Negative Declaration as a well written statement briefly describing the reasons that a proposed project will not have a significant effect on the environment and does not require the preparation of an environmental impact report.

Section 21604.5 defines a Mitigated Negative Declaration as a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revision in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration is released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the lead agency that the project, as revised, may have a significant effect on the environment.

CEQA Section 21068 defines a significant effect on the environment as a substantial or potentially substantial adverse change in the environment. CEQA Section 21082.2(a) requires the lead agency to determine whether a project may have a significant effect on the environment based on substantial evidence in light of the whole record.

Accordingly, the District has prepared an Initial Study to address the potential environmental effects associated with the Project pursuant to the requirements of CEQA, the CEQA Guidelines, and the District's CEQA Guidelines. Specifically, the Initial Study meets the requirements of CEQA Guidelines Section 15063 and the District's CEQA Guidelines Section IV. The Initial Study includes a discussion of the Project's effects on the existing environment. Issue areas identified as having potential impacts are discussed further and include mitigation measures that would reduce potential impacts to "Less Than Significant with Mitigation Incorporated." Project-specific information is discussed below.

See Attachment A for the Initial Study.

### **B. Project Applicant**

The Project Proponent is HIW Associates, LP, a California Limited Partnership, and is a tenant of the District.

### **C. Project Purpose and Need**

The HIWM consists of aging infrastructure that is nearing the end of its useful life and needs replacement to ensure the marina's continuation and long-term competitiveness. HIW Associates, LP is proposing a renovation project that includes replacement of the existing aged dock structure with a similarly sized new dock structure within the footprint of the existing dock layout and replacement of the existing landside buildings with a slightly smaller building structure.

Accordingly, the proposed Project would allow the operator to accommodate the needs of the current boating market while improving public access to the waterfront and increasing public safety for the users and their guests. The proposed Project would also allow for a more energy efficient and environmentally conscious marina property, provide facilities that comply with current Americans with Disabilities Act (ADA) standards, maintain facilities that create and promote more slip opportunities for entry level recreational boating while accommodating the evolving needs of recreational boaters, and to ensure the HIWM's long-term operation.



## D. Project Location

The project location and regional vicinity is illustrated in Figure 1 (Regional Vicinity) and Figure 2 (Project Location) of Attachment A, respectively. The Project site is located at 2040 Harbor Island Drive, San Diego, CA 92101 within Planning District 2 (Harbor Island/Lindbergh Field), of the certified Port Master Plan (PMP). 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.

Existing adjacent land uses to the Project site include the Hilton San Diego Airport/Harbor Island Hotel to the east; Tom Ham's Lighthouse Restaurant to the west; open water to the north; and Harbor Island Drive, Harbor Island Park, and North San Diego Bay to the south. Major circulation facilities in the area include North Harbor Drive, Rosecrans Street, and Interstate 5 (I-5).

## II. PROJECT DESCRIPTION

The proposed Project includes the repair, maintenance, replacement, and redevelopment of the HIWM. Specifically, the Project consists of the following elements as shown in Figure 5 (Proposed Site Plan) and Figure 6 (Conceptual Improvements) of Attachment A.

- Demolition of 23,000 square feet of existing building space and reconstruction of approximately 15,682 square feet of new building space. Existing and new buildings have a maximum elevation of 45 feet above grade;
- Demolition of the existing 120,000-square-foot paved parking lot and construction of a new 116,000-square-foot paved parking lot;
- Removal of 15,000 square feet of existing landscaping with installation of approximately 18,000 square feet of new landscaping with an area for bicycle parking;
- Reconstruction of an existing 6,000-square-foot public viewing deck and construction of a new public 12-foot-wide promenade;
- Reconstruction of a 1,200-square-foot swimming pool and 75-square-foot Jacuzzi. The reconstructed pool remains the same size while the Jacuzzi increases from 75 square feet to 100 square feet.
- Demolition of 146,000 square feet of existing docks providing 620 boat slips and construction of 139,218-140,000 square feet of new docks providing 623 boat slips; and,
- Modernization of on-site utilities and lighting.

The Project also involves a proposed new 5040-year lease to HIW Associates, LP from the District for construction, operation, and maintenance of the proposed Project.

As part of fulfilling BPC Policy No. 608 (Tenant Percent for Art Program), the proposed Project includes the potential for a public art component on the Project site which may include functional artwork along the proposed promenade and/or a contribution to the Coronado Bridge Lighting Project.

## A. Landside Improvements

A comparison of the existing landside conditions and the proposed improvements is presented below in Table 1. Attachment A provides additional details and figures.

**Table 1. Existing Conditions and Proposed Landside Improvements Summary**

Project Component	Existing Conditions		Proposed Improvements		Change from Existing Conditions
	Quantity	Component Area	Quantity	Component Area	
Buildings	<del>34</del>	23,000 sq. ft.	<del>23</del>	15,682 sq. ft.	Decrease of 7,318 square feet of building area; 1 fewer building
Landscaping	--	15,000 sq. ft.	--	18,000 sq. ft.	Increase of 3,000 square feet of landscaped area
Parking Lot Pavement	--	120,000 sq. ft.	--	116,000 sq. ft.	Decrease in 4,000 square feet of parking lot pavement
Parking Spaces	351	--	380	--	Increase in 29 parking spaces ( <u>a minimum of 12 up to 4</u> available to public)
Public Promenade	--	N/A	--	900 linear ft.	Increase in 900 linear feet
Public viewing deck	1	6,000 sq. ft.	1	6,000 sq. ft.	Reconstructed, but same amount of area
Swimming Pool	1	1,200 sq. ft.	1	1,200 sq. ft.	Reconstructed, but same amount of area
Jacuzzi	1	75 sq. ft.	1	100 sq. ft.	Increase of 25 square feet
Bicycle Parking	0	--	25	--	Increase in 25 bicycle parking spaces

Source: Applicant-provided information 2018HIW-2018.

## B. Waterside Improvements

Table 2 provides a summary comparison of the existing waterside conditions. Attachment A provides additional details and figures.

**Table 2. Existing Conditions and Proposed Waterside Improvements Summary**

Project Component	Existing Conditions		Proposed Improvements		Change from Existing Conditions
	Quantity	Component Area	Quantity	Component Area	
Docks	11	146,000 sq. ft.	<del>11</del> 40	<del>139,218</del> 140,000 sq. ft.	Decrease of <del>6,782</del> 6,000-square feet of dock area
Piles <sup>1</sup>	326	326 sq. ft.	<del>237</del> 313 <sup>2</sup>	<del>321</del> 383.55 sq. ft.	Decrease of <del>89</del> 43 piles, <u>decrease in 5 sq.ft.</u> increase in <u>57.55 sq. ft.</u> of pile area <sup>3</sup>
Boat Slips	620	--	<del>623</del> 603	--	<u>Increase of 3</u> <del>Decrease of 17</del> boat slips
Dedicated Fire Standpipes <sup>4</sup>	0	--	<del>33</del> 30	--	Increase in <u>33</u> <del>30</del> -fire standpipes
Boater Access Ramps	4	--	4	--	No change
Sanitary Pump Station	1	--	1	--	No change

Fuel Dock	1	--	1	--	Replace in-kind <del>No change</del>
-----------	---	----	---	----	---

Source: Applicant-provided information 2021~~HIW 2018~~.

<sup>1</sup> Existing piles are 12-inch square concrete piles (approximately 1 square foot per each pile). New piles would be a combination of 14-inch square concrete piles (approximately 1.36 square feet each), ~~and~~ 18-inch square concrete piles (approximately 2.25 square feet each), ~~and~~ 20-inch square concrete piles (approximately 2.78 square feet each).

<sup>2</sup> Existing piles consist of 326 12-inch square concrete piles totaling 326 square feet. Proposed piles would consist of ~~237~~313 piles (~~189 re-used 12-inch square concrete piles, 95 14-inch square concrete piles, and 29 18-inch square concrete piles~~) totaling ~~321~~ 383.55 square feet.

<sup>3</sup> Pile square footage is part of the overall dock system square footage.

<sup>4</sup> Dedicated Fire Standpipes are a type of rigid water piping to which fire hoses can be connected, allowing manual application of water to the fire. A standpipe serves the same purpose as a fire hydrant.

The proposed changes to the dock/headwalk extensions would result in the realignment of the existing slips within the marina. The proposed changes to the dock and slip configuration would result in a reduction in the overall size of the current dock facility from 146,000 square feet to 139,218 ~~140,000~~-square feet (a 6,782 ~~6,000~~-square-foot reduction in bay coverage), and an increase in slips approximately 17 fewer slips (from 620 slips to 623 ~~603~~-slips). ~~While the reconstruction of the dock system would result in 17 fewer boat slips, t~~The new dock system configuration would provide for a wider range of vessel sizes, including the ability to accommodate smaller vessels down to 12 feet -in -length, which are currently not serviced at the marina. The proposed slip mix would increase the number of tie-ups and slips for smaller vessels, and slips would continue to be available to the general public. Table 3 provides a summary of the proposed slip mix.

**Table 3. Proposed Slip Mix Summary**

Slip Range	Existing		Proposed	
	Slip Quantity	% of Total Slip Inventory	Slip Quantity	% of Total Slip Inventory
12 – 20 feet	0	0%	<u>57</u> <del>32</del>	<u>9.55</u> <del>14</del> %
21 – 25 feet	96	15.5%	<u>406</u> <del>115</del>	<u>17.6</u> <del>18.45</del> %
26 – 30 feet	111	17.9%	<u>55</u> <del>72</del>	<u>9.4</u> <del>11.55</del> %
31 – 35 feet	231	37.3%	<u>474</u> <del>195</del>	<u>28.9</u> <del>31.30</del> %
36 – 40 feet	106	17.1%	<u>73</u> <del>19</del>	<u>12.4</u> <del>13.05</del> %
41 – 45 feet	9	1.5%	<u>28</u> <del>44</del>	<u>4.6</u> <del>7.06</del> %
46 – 50 feet	44	7%	<u>44</u> <del>68</del>	<u>7.3</u> <del>10.91</del> %
Greater than 51 feet	23	3.7%	<u>66</u> <del>78</del>	<u>10.9</u> <del>12.52</del> %
<b>Total</b>	<b>620</b>	<b>--</b>	<b><u>623</u> <del>603</del></b>	<b>--</b>

Source: Applicant-provided information 2021~~HIW 2018~~.

### C. New Lease

The proposed Project includes a new lease between the District and HIW Associates, LP for a term of 50~~40~~ years. The uses in the lease would allow HIW Associates, LP to construct, operate, and maintain a recreational marina with 623 ~~603~~-boat slips along with associated ancillary facilities, including, but not limited to, deli/food service, retail, marine-related offices, and marina support facilities; customer parking; a public promenade and a public lookout deck; and the marina-related operations and businesses.

## III. ENVIRONMENTAL SETTING

The HIWM is one of five marinas located on the north side of Harbor Island in San Diego Bay. Within the project vicinity, landside facilities on Harbor Island include hotels, restaurants, public parks and greenways, and marine service facilities. Water use within the project vicinity is characterized by a mix of commercial and recreational uses. The commercial water uses within the project vicinity consist of boat rentals,

charters, lessons, sailing clubs, and other similar visitor servicing uses. However, the dominant use of the water area is recreational boating. Vehicular traffic mostly consists of access to the various businesses that reside on Harbor Island.

The existing landside structures include 1 single-story building, ~~and~~ 2 two-story wood-framed buildings, and a western restroom with a total plan footprint area of approximately 23,000 square feet. These buildings currently provide space for offices, lockers/storage, janitor facilities, laundry, a restaurant, snack bar, deli/food service, visitor-serving retail, mechanical maintenance facilities and a chandlery, as well as a club room and locker room for users of the marina. There is a large asphalt parking area with 351 parking stalls on the Project site. The existing waterside improvements include 146,000 square feet of docks with 620 boat slips.

The Project is located within the jurisdiction of the District and is located within Planning District 2 (Harbor Island/Lindbergh Field), of the certified PMP. The specific land and water use designations for the Project site include Commercial Recreation, Recreation Boat Berthing, Fueling Dock, and Sanitary Pump Dock. The Project is compatible with existing land and water use designations.

#### **IV. ENVIRONMENTAL ANALYSIS**

##### **A. Environmental Factors Potentially Affected**

The Initial Study (Attachment A) evaluated the potential environmental impacts of the proposed Project and determined that the proposed Project would result in impacts that are mitigated to below a level of significance for biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and recreation. A full analysis/discussion of these issue areas is provided in the attached Initial Study.

##### **B. Effects Found Not to Be Significant**

Based on the Initial Study conducted for the proposed Project (see Attachment A), the following effects were found not to be significant and no mitigation is required: aesthetics, agriculture and forestry resources, air quality, cultural resources, energy, greenhouse gas emissions, land use and planning, mineral resources, noise, population and housing, public services, traffic, tribal cultural resources, utilities and service systems, and wildfire. A full analysis/discussion of these issue areas is provided in the attached Initial Study.

#### **V. MITIGATION MONITORING AND REPORTING PROGRAM**

Reporting and documentation of implementation of the following mitigation measures shall be performed in accordance with District Administrative Policy No. 750.



**Table 4. Harbor Island West Marina Redevelopment Project MND Mitigation Monitoring and Reporting Plan**

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<b>Biological Resources</b>		
<p><b>MM-BIO-1: Monitoring Program.</b> Prior to construction activities involving in-water pile driving, the project proponent shall prepare and implement a marine mammal and green sea turtle monitoring program. This monitoring program shall be approved by the District and shall include the following requirements:</p> <ul style="list-style-type: none"> <li>• For a period of 15 minutes prior to the start of in-water construction, a qualified biologist, retained by the project proponent and approved by the District's Director of Development or designee of the District, shall continuously monitor a 74-meter radius (zone of influence) around the active pile driving areas to ensure that special status species are not present.</li> <li>• The construction contractor shall not start work if any observations of special status species are made prior to starting pile driving. No driving will be conducted until the area has been free of marine mammal sightings for 15 minutes.</li> <li>• The qualified biologist shall continually monitor the zone of influence (ZOI - 74 meters from pile driving activity) during pile driving activities to observe any marine mammals or turtles that approach or enter the ZOI. The qualified biologist shall have authority to stop all work on-site and shall do so if a marine mammal or sea turtle enters the ZOI or could otherwise be impacted by construction noise.</li> </ul> <p>The qualified biologist must meet the minimum requirements as defined by the National Oceanic Atmospheric Administration's <i>Guidance for Developing a Marine Mammal Monitoring Plan</i> (NOAA 2017).</p>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Qualified marine biologist, approved by the District, Project proponent</p> <p><b>Verification:</b> District</p>	<p>Prior to in-water construction</p>
<p><b>MM-BIO-2: Soft Start Methodology for Impact Hammer Pile Driving.</b> The contractor shall initiate all impact hammer pile driving techniques with a soft start methodology using an initial three sets of three low energy pile strikes. Low energy strikes are performed by running the impact hammer at reduced energy (typically 50-70 percent of full impact force) followed by a 30-second waiting period to initiate impact driving before ramping up to full hammer energy. The soft-start methodology shall be utilized any time pile driving has ceased for a period in excess of 30 minutes, provided compliance with MM-BIO-1 confirms pile driving activities may commence.</p>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Qualified marine biologist, approved by the District, Project proponent</p> <p><b>Verification:</b> District</p>	<p>During in-water project construction</p>
<p><b>MM-BIO-3: Avoid Nesting Season for Birds or Conduct Preconstruction Nesting Surveys.</b> To ensure compliance with the MBTA and similar provisions under Sections 3503 and 3503.5 of the California Fish and Game Code, the Project proponent shall conduct all vegetation removal (e.g., ornamental trees) during the non-breeding season between September 1 and March 14 or shall implement the following:</p>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Qualified</p>	<p>Prior to and during landside vegetation clearing/construction</p>

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<ol style="list-style-type: none"> <li>1. If landside construction activities are scheduled between March 15 and August 31, the Project proponent shall retain a qualified biologist who shall conduct a focused nesting bird survey within potential nesting habitat prior to the start of vegetation removal. The survey shall be submitted to the District's Environmental Conservation Department prior to the commencement of vegetation removal on the Project site.</li> <li>2. The nesting bird survey area shall include the entire limits of disturbance plus a 500-foot buffer to ensure indirect impacts would be avoided. 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 biologist(s). The survey shall occur between sunrise and 12:00 p.m., when birds are most active. If no active nests are detected during these surveys, only a brief letter report documenting the results shall be prepared.</li> <li>3. If the qualified biologist confirms nesting within 300 feet of the disturbance footprint, 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 a qualified biologist determines that the nest is no longer active. The size and constraints of the no-disturbance buffer shall be determined by the qualified biologist, but shall not be greater than 300 feet. If there is a delay of more than 7 days between when the nesting bird survey is performed and vegetation removal begins, the qualified biologist shall resurvey to confirm that no new nests have been established.</li> </ol>	<p>biologist, approved by the District, Project proponent</p> <p><b>Verification:</b> District</p>	
<p><b>MM-BIO-4: Develop and Implement an Eelgrass Mitigation and Monitoring Plan as Required by the California Eelgrass Mitigation Policy.</b> Prior to the start of any in-water construction, the Project proponent shall retain a qualified biologist to develop and implement an eelgrass mitigation plan in compliance with the California Eelgrass Mitigation Policy. The qualifications of the qualified biologist are subject to approval by the District's Environmental Conservation Department. The mitigation plan shall be submitted to the District's Environmental Conservation Department and resource agencies (NMFS and CDFW) for approval 60 days prior to initiation of waterside project activities. The mitigation plan shall be implemented to (1) develop new eelgrass habitat on the areas of the vessel dock areas that will no longer be shaded and (2) compensate for losses to eelgrass in the event that the surveys described below indicate the project has impacts on eelgrass. The specific eelgrass mitigation plan elements shall, at a minimum, include the following:</p> <ol style="list-style-type: none"> <li>1. Prior to the commencement of any in-water construction activities, a qualified marine biologist retained by the Project Applicant and approved by the District shall conduct a pre-construction eelgrass survey. Surveys for eelgrass shall be conducted during the active eelgrass growing season (March–October), and results will be valid for 60 days, unless completed in September or October. If completed in September or October, results will be valid until March (the resumption of the next growing season). The qualified marine biologist shall submit the results of the pre-construction survey to the District and resource agencies within 30 days.</li> </ol>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Qualified marine biologist, approved by the District, Project proponent</p> <p><b>Verification:</b> District, NMFS (NOAA Fisheries)</p>	<p>Prior to the start of any in-water construction, during construction, and post-construction</p>

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<p>2. Identification of areas within and potentially outside of the marina that are considered favorable to restore a minimum of 5,452 square meters (58,685 square feet) of eelgrass habitat. In addition, the mitigation plan shall include:</p> <ul style="list-style-type: none"> <li>a. Description of harvest and transplantation techniques to satisfy California Department of Fish and Wildlife requirements with regards to ensuring protection of beds used as a source of transplant material.</li> <li>b. A schedule that ensures eelgrass is transplanted as soon as possible following reconfiguration of the eastern portion of the marina where suitable planting sites become un-shaded by dock structures.</li> </ul> <p>3. The Project proponent, through its general contractor shall:</p> <ul style="list-style-type: none"> <li>a. Provide the pre-construction eelgrass surveys noted above identifying and demarcating the distribution of eelgrass to construction crews to assist tug and barge operations to avoid impacting eelgrass.</li> <li>b. Require all tug and barge operators to locate all anchored and spudded construction barges outside of eelgrass beds when not in use.</li> <li>c. Instruct tugboat operators that propeller wash can damage eelgrass beds and not to direct propeller wash towards eelgrass beds. No anchoring (and other bottom-disturbing activities) shall occur within eelgrass beds.</li> </ul> <p>4. Within 30 days of completion of in-water construction activities, a qualified marine biologist retained by the Project Applicant and approved by the District shall conduct a post construction eelgrass survey during the active eelgrass growing season or within the first 30 days of the next active growth period following construction that occurs outside of active growth period. The post-construction survey shall evaluate potential eelgrass impacts associated with construction. Upon completion of the post-construction survey, the qualified marine biologist shall submit the survey report to the District and resource agencies within 30 days.</p> <p>5. At least two years of annual post-construction eelgrass surveys shall be conducted during the active eelgrass growing season. The additional annual surveys shall evaluate the potential for operational impacts on eelgrass.</p> <p>6. In the event that construction impacts on eelgrass are detected in the post-construction survey and/or subsequent surveys, the Project Applicant shall implement the following:</p> <ul style="list-style-type: none"> <li>a. A qualified marine biologist retained by the Project Applicant and approved by the District shall develop a mitigation plan for in-kind mitigation. The qualified marine biologist shall submit the mitigation plan to the District and resource agencies within 60 days following the post-construction survey.</li> <li>b. The eelgrass mitigation and monitoring plan shall specify that the contractor/entity harvesting eelgrass to implement the required mitigation would need to obtain a Scientific Collecting Permit (SCP) for eelgrass harvest and a letter of authorization (LOA) at least 30–60 days prior to implementation.</li> </ul>		

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<ul style="list-style-type: none"> <li>c. Mitigation for eelgrass impacts shall be at a ratio of no less than 1.2:1, as required by the California Eelgrass Mitigation Policy.</li> <li>d. Mitigation shall commence within 135 days of any noted impacts on eelgrass, such that mitigation commences within the same eelgrass growing season that impacts occur.</li> <li>e. Upon completing mitigation, the qualified biologist shall conduct mitigation performance monitoring at performance milestones of 0, 12, 24, 36, 48, and 60 months.</li> <li>f. The qualified biologist shall conduct all mitigation monitoring during the active eelgrass growing season and shall avoid the low growth season (November–February). Performance standards shall be in accordance with those prescribed in the California Eelgrass Mitigation Policy.</li> <li>g. The qualified biologist shall submit the monitoring reports and spatial data to the District and resource agencies within 30 days after the completion of each monitoring period. The monitoring reports shall include all of the specific requirements identified in the California Eelgrass Mitigation Policy.</li> </ul>		
<b>Geology and Soils</b>		
<p><b>MM-GEO-1: Compliance with Recommendations of the Geotechnical Studies.</b> Implementation of the proposed Project would comply with the recommendations of the Geotechnical Studies (Geotechnical Investigation Landside Improvements Harbor Island West Marina prepared by TerraCosta Consulting Group, Inc. dated January 28, 2015 and Guide Pile and Approach Pier/Gangway Foundation Design Criteria Harbor Island West Marina Letter Report prepared by TerraCosta Consulting Group, Inc. dated December 10, 2012 ) to ensure seismic ground-shaking does not impact the proposed Project.</p>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Project proponent</p> <p><b>Verification:</b> City of San Diego/District</p>	Prior to/during construction
<b>Hazards and Hazardous Materials</b>		
<p><b>MM-HAZ-1: Conduct Sediment Sampling and Implement Remediation Measures.</b> At the conclusion of the pile driving, the Project Applicant shall conduct sediment sampling of representative areas of potential disturbance near the location of piles. Sampling shall be conducted in accordance with the Water Quality Control Plan for Enclosed Bays and Estuaries (SWRCB 2009). Sediment sampling results shall rely on the Effects Range – Low (ER-L) and Effects Range – Medium (ER-M) guideline values of the National Oceanic and Atmospheric Association (NOAA) Screening Quick Reference Tables (Buchman 2008). If the sediment samples show concentrations of sediment contamination above the guideline values, the Project Applicant shall delineate the extent of cross-contamination and propose remediation approaches (subject to approval by the District and any other agencies with jurisdiction over site contamination) that may include, but are not limited to, dredging, placement of sand cover, or Enhanced Monitored Natural Recovery (EMNR) sand containing</p>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Sampling and Remediation Report</p> <p><b>Verification:</b> District, RWQCB, other regulatory agencies as appropriate</p>	Conclusion of pile driving

Mitigation Measure(s)	Responsible Party	Mitigation Timing
active carbon. The Project Applicant shall implement the approved remediation. The results of the sampling and remediation shall be documented in a report to be reviewed and approved by the District, RWQCB, and any other appropriate regulatory agencies.		
<b>Hydrology and Water Quality</b>		
<p><b>MM-HWQ-1: Implementation of Best Management Practices During Hydraulic Jetting and Pile Driving.</b> The following best management practices (BMPs) shall be implemented during the Project's hydraulic jetting and pile driving process:</p> <ul style="list-style-type: none"> <li>• Pile Jetting: Contractor shall control sediment displacement by reducing the jetting volume and/or velocity where feasible. Prior to pile jetting, the contractor shall first "stab" the pile into the bottom substrate to advance it through the upper layer of soft sediment and then jet the pile to reduce sediment disturbance during jetting operations.</li> <li>• Silt Curtains: Silt curtains shall be in place for the entirety of the Project (i.e., installed before the jetting process begins and not be removed until the pile driving is completed for all piles). The silt curtains shall be placed as close to the construction zone as practical and extend to the bottom but should not rest on the seafloor based on tidal variations. Given the tidal variation at the Harbor Island West Marina, the length of the silt curtains shall be adjusted to accommodate varying water levels (e.g., use of curtains with reefing or furling lines). The maximum water depth in the vicinity of the Harbor Island West Marina is approximately 20 feet at high tide; therefore, a 19 foot deep silt curtain shall likely be sufficient for the deepest areas. Shorter curtains may be used in shallower areas. Silt curtain specifications shall be provided to the District prior to installation. Silt curtain deployment shall be monitored by the construction contractor personnel proficient in all aspects of silt curtains to ensure that turbidity does not escape and tidal currents do not cause deflection, and that the curtain length is properly set. Torn or damaged curtains shall be repaired or replaced immediately.</li> <li>• Debris Handling: Removed pilings, debris, and any adhering sediment shall be disposed of off-site by the contractor. If sediment must be stored at the Project site prior to disposal, it should be placed in containers or lined/covered storage areas constructed to prevent release and spillage.</li> <li>• Surface Boom: A floating surface boom shall be used to capture floating debris. The boom shall be placed at a sufficient distance from the construction area so as to capture all debris. Debris should be removed at the end of every work day, or sooner. In the case of rough waters, debris shall be removed immediately. If there is any reason to believe that there will be any oil, fuel, creosote, or other similar materials released during jetting, absorbent pads shall be required in conjunction with the boom.</li> <li>• Utility Boat: A small boat shall be available throughout the duration of waterside Project construction to manage the silt curtains, booms, and debris.</li> <li>• Equipment Inspection: All jetting equipment, including hoses, lines, and jet pumps, shall be inspected daily and replaced or repaired accordingly.</li> </ul>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Monthly report to District</p> <p><b>Verification:</b> District</p>	During hydraulic jetting and pile driving

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<ul style="list-style-type: none"> <li>• Navigation Restrictions: Work activities and restrictions to boat navigation shall be scheduled and coordinated ahead of time with the District and Harbor Island West Marina and Sheraton San Diego Hotel and Marina tenants. Sufficient notification shall be provided. In the event that emergency vessel traffic must be accommodated, the contractor shall move the BMPs immediately.</li> <li>• Structure Demolition: To the greatest extent possible, any structures requiring demolition shall be removed whole and dismantled at a location away from the water.</li> <li>• Daily Inspection: All BMPs shall be inspected at least daily. Any faulty/failing equipment shall be repaired/replaced as necessary. Daily visual water quality monitoring shall include monitoring for any visible turbidity plumes, oil or sheens, floating debris, or water discoloration associated with project construction activities and shall be conducted a minimum of one hour after commencement of construction activities with the potential to cause sediment disturbance. A monthly report of the monitoring shall be compiled and submitted to the District's Engineering and Construction Management Department. If a turbidity plume is observed, response actions shall be immediately taken (see MM-HWQ-2).</li> </ul>		
<p><b>MM-HWQ-2: Implementation of Best Management Practices for Turbidity Monitoring During Hydraulic Jetting and Pile Driving.</b> The following best management practices (BMPs) for turbidity monitoring shall be implemented during the Project's hydraulic jetting and pile driving processes:</p> <ul style="list-style-type: none"> <li>• Turbidity shall be monitored a minimum of once per week at mid-depth of water column. The monitoring shall include the following: <ul style="list-style-type: none"> <li>○ Monitoring Stations – During weekly monitoring turbidity shall be measured at the construction site after pile driving activities have been underway for at least one hour and at a reference site. Monitored water quality measurements shall be compared to ambient San Diego Bay reference measurements located outside of the construction area (outside silt curtain) that are not impacted by the construction.</li> <li>○ Project Compliance Stations – A minimum of three locations shall be established as compliance stations for the collection of water quality monitoring data. Compliance station data shall be compared to reference station data to determine if the construction activities are impacting water quality based on the Performance Standards (see below). Compliance stations shall be located evenly along an arc located 200 feet from the edge of the construction area to capture all tidal and current conditions. The locations may be adjusted in the field to better target a visible turbidity plume, if a visible plume is observed.</li> <li>○ Reference Station – A minimum of one station shall be established as a reference station to measure ambient San Diego Bay water quality conditions and shall be located in the direction of the mouth of the Bay and 1,000 feet beyond the influence of construction activities. Natural turbidity shall be determined through measurements at</li> </ul> </li> </ul>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Monthly Report to District</p> <p><b>Verification:</b> District</p>	<p>During hydraulic jetting and pile driving</p>

Mitigation Measure(s)	Responsible Party	Mitigation Timing
<p>the reference station in order to compare the reference station measurements to compliance stations measurements.</p> <ul style="list-style-type: none"> <li>○ Global Position System – Monitoring station positions will be located using a Global Position System (GPS) accurate to within <math>\pm 3</math> meters.</li> <li>• Performance Standards – The following turbidity standards are based on recent Regional Water Quality Control Board permit requirements (e.g., RWQCB, 2016; RWQCB, 2017) and are required to meet performance standards: <ul style="list-style-type: none"> <li>○ If reference station turbidity is between 0 to 50 NTUs, the maximum increase from construction activities must not exceed 20 percent of the measured turbidity at the reference station. If reference station turbidity is between 51 to 100 NTUs, the maximum increase from construction activities must not exceed 10 NTUs. If reference turbidity is greater than 100 NTUs, the maximum increase from construction activities must not exceed 10 percent above the reference levels.</li> </ul> </li> <li>• Response Actions to Water Quality Monitoring Exceedance - In the event that visual observations (MM-HWQ-1, MM-HWQ-3) or the water quality monitoring described here in MM-HWQ-2, indicate an exceedance of an applicable receiving water Performance Standard, the following actions shall be implemented: <ul style="list-style-type: none"> <li>○ Immediately re-take water measurements at reference and compliance stations in accordance with the procedures in MM-HWQ-2.</li> <li>○ Evaluate the measurements at background and compliance monitoring stations and use visual observations to determine whether the exceedance is caused by construction activities or by other ambient conditions in San Diego Bay such as wind waves, boat wakes, barge/ship traffic, and storm inflow.</li> <li>○ If the exceedance is confirmed to be a result of the project construction, monitor conducting the water quality monitoring shall coordinate with the District's Engineering and Construction Management Department to immediately notify the contractor to modify or cease operations related to in-water construction activities and/or inspect the BMP's to ensure they are working properly to mitigate the exceedance. Operational modifications may include fixing, adjusting, maintaining, and/or upgrading silt curtains or use of a second silt curtain.</li> <li>○ Re-evaluate water measurements at all relevant stations no more than 30 minutes later, after additional BMPs or operational modifications are implemented.</li> <li>○ If the receiving water performance standards exceedance continues to persist, even with additional BMPs, determine and implement operational modifications including modifying the rate of jetting, waiting longer to initiate pile driving, or perform more start-stops until the exceedance levels comply with the performance standards. If necessary, corresponding construction activities shall be stopped until performance standards are met. Typically, turbidity is reduced within one hour.</li> </ul> </li> </ul>		



Mitigation Measure(s)	Responsible Party	Mitigation Timing
<p><b>MM-HWQ-3: Implementation of Best Management Practices for Visual Monitoring During Hydraulic Jetting and Pile Driving.</b> Implement the following response actions to visual plumes observed outside of the silt curtain:</p> <ul style="list-style-type: none"> <li>• If the condition of the silt curtain is observed to be damaged, no longer positioned around the in-water construction area, or has gaps where a visible turbidity plume is forming outside of the silt curtain, the contractor shall act immediately to correct the silt curtain to prevent any turbidity outside the silt curtain.</li> <li>• Actions to ensure the silt curtain is functioning shall include, but are not limited to, work stoppage to inspect the silt curtain; repair the silt curtain; position or reposition the silt curtain around the active work area; ensure the silt curtain has no gaps; implementation of operational modifications (e.g., fixing, adjusting, maintaining, and/or upgrading silt curtains); and/or, implementation of a second silt curtain.</li> <li>• If receiving water quality monitoring indicates an exceedance of the Performance Standards, construction activities shall be halted until measured turbidity has decreased to levels below Performance Standards.</li> <li>• All response actions shall be documented and reported to the District in writing and by phone immediately.</li> </ul>	<p><b>Implementation:</b> Project proponent</p> <p><b>Monitoring and Reporting:</b> Report in writing and by Phone</p> <p><b>Verification:</b> District</p>	<p>Immediately by phone and within 24 hours by report</p>



## VI. FINDINGS

The Project, with the incorporation of mitigation measures and monitoring program, will have no significant impact on the environment with respect to biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and recreation, nor would the Project otherwise have potentially significant adverse impacts to aesthetics, agriculture and forestry resources, air quality, cultural resources, energy, greenhouse gas emissions, land use and planning, mineral resources, noise, population and housing, public services, traffic, tribal cultural resources, utilities and service systems, and wildfire.

## VII. DOCUMENTATION

The attached Initial Study (Attachment A) and additional appendices document the reasons in support of the above findings.

## VIII. CERTIFICATION

The Draft Mitigated Negative Declaration and supporting documents are on file with and may be reviewed during regular District business hours in the Office of the District Clerk of the San Diego Unified Port District, 3165 Pacific Highway, San Diego, CA 92101. The District administration offices are open Monday through Thursday and every other Friday from 8:00 AM to 5:00 PM.

Prepared by: 11.26.2019  
Date

  
Megan Hamilton, Planner

Draft Report 12.5.2019  
Date

  
Wileen Manaois, Director, Development Services

Final Report 11/2/2023  
Date

  
Wileen Manaois, Director, Development Services

Attachment A Initial Study/Environmental Checklist for the  
Harbor Island West Marina Redevelopment  
Project

# Initial Study/Environmental Checklist for the Harbor Island West Marina Redevelopment Project

*Prepared for:*



**San Diego Unified Port District**

~~December 2019~~ November 2023



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## Acronyms and Abbreviations

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12-hour $L_{eq}$	12-hour Average Noise Level
AB	Assembly Bill
ACMs	asbestos-containing materials
ADT	average daily traffic
AFY	Acre Feet Per Year
AIA	Airport Influence Area
AICUZ	Air Installation Compatible Use Zones
ALUCP	Airport Land Use Compatibility Plan
AP	Alquist-Priolo
AQIA	Air Quality Impact Analysis
ARB	California Air Resources Board
Basin Plan	Water Quality Control Plan for the San Diego Basin
BMPs	best management practices
CAAQS	California ambient air quality standards
Cal/EPA	California Environmental Protection Agency
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod™	California Emissions Estimate Model
CalARP	California Accidental Release Prevention
CAL FIRE	California Department of Forestry and Fire
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CCA	California Coastal Act
CCC	California Coastal Commission
CCR	California Code of Regulations
CDP	Coastal Development Permit
CEQA	California Environmental Quality Act
CGP	Construction General Permit
CH <sub>4</sub>	methane
CHL	California Historic Landmark
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
Cy	cubic yards
dB	decibels

dBA	A-weighted decibel
DEH	Department of Environmental Health
DFSP	Defense Fuel Support Point
DOC	California Department of Conservation
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EFH	Essential Fish Habitat
EI	Expansion Index
EIR	Environmental Impact Report
ELAP	Environmental Laboratory Accreditation Program
EMPS	Embarcadero Marina Park South
EPA	Environmental Protection Agency
FAA	Federal Aviation Administration
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMP	Fishery Management Plan
GHG	greenhouse gases
GSP	Groundwater Sustainability Plan
GWP	global warming potential
HAPC	habitat area of particular concern
HIWM	Harbor Island West Marina
HMD	Hazardous Materials Division
HREA	Health Risk and Exposure Assessment
HSC	Health and Safety Code
HU	hydrologic unit
I-5	Interstate 5
in/s	inches per second
INRMP	Integrated Natural Resource Management Plan
IPCC	Intergovernmental Panel on Climate Change
JRMP	Jurisdictional Runoff Management Program
LE	24-hour accumulation noise levels
LED	light-emitting diode
LEED	Leadership in Energy and Environmental Design
$L_{eq}$	average sound level
LOS	level of service
$L_{pk}$	peak sound levels
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
Mgd	million gallons per day
MLD	most likely descendant
MLLW	mean lower low water

**San Diego Unified Port District  
Harbor Island West Marina Redevelopment Project**

MMPA	Marine Mammal Protection Act
MOU	memorandum of understanding
MRZ-1	Mineral Resource Zone 1
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
Msl	mean sea level
MSW	municipal solid waste
MT	metric tons
MWD	Metropolitan Water District of Southern California
N <sub>2</sub> O	nitrous oxide
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NAS	Naval Air Station
NBPL	Naval Base Point Loma
NEVP	North Embarcadero Visionary Plan
NFPA	National Fire Protection Association
NMAWC	Naval Main and Anti-Submarine Warfare Command
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	oxides of nitrogen
NTC	Naval Training Center
O <sub>3</sub>	ozone
OES	Office of Emergency Services
OSHA	Occupational Safety and Health Administration
Ozone Plan	2016 Ozone Attainment Plan for San Diego County
PAHs	polycyclic aromatic hydrocarbons
Pb	lead
PCBs	polychlorinated biphenyls
PDPs	Priority Development Projects
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
PM10	particulate matter 10 microns or less in diameter
PM2.5	particulate matter 2.5 microns or less in diameter
PMP	Port Master Plan
PMPA	Port Master Plan Amendment
PPV	peak particle velocity
PRC	Public Resources Code
Project	Harbor Island West Marina Redevelopment Project
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCNM	Roadway Construction Noise Model

RCRA	Resource Conservation and Recovery Act
RES	Regional Energy Strategy
RHA	Rivers and Harbors Act
RMS	root mean square
RTP	Regional Transportation Plan
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCIC	South Coastal Information Center
Scoping Plan	Climate Change Scoping Plan
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDBEP	San Diego Bay Ecosystem Plan
SDCRAA	San Diego Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFRD	City of San Diego's Fire-Rescue Department
SDG&E	San Diego Gas and Electric
SDIA	San Diego International Airport
SDPD	City of San Diego Police Department
SDUSD	San Diego Unified School District
SGMA	Sustainable Groundwater Management Act
SLR	Sea Level Rise
SLTs	screening-level thresholds
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	oxides of sulfur
SPCC	Spill Prevention Control and Countermeasure
SR	State Route
SSC	Space and Naval Warfare Systems Center
ST	short-term
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TSCA	Toxic Substances Control Act
UBC	Uniform Building Code
USGS	U.S. Geological Survey
USC	United States Code
USTs	underground storage tanks
UWMP	Urban Water Management Plan
V/C	volume to capacity ratio
VOC	Volatile Organic Compounds

**San Diego Unified Port District  
Harbor Island West Marina Redevelopment Project**

Wastewater Branch    City of San Diego's Public Utilities Department Wastewater Branch  
ZOI                      zone of influence



## Section 1 Background

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### 1.1 Summary

<b>Project Title:</b>	Harbor Island West Marina Redevelopment Project
<b>Lead Agency Name and Address:</b>	San Diego Unified Port District 3165 Pacific Highway San Diego, CA 92101
<b>Contact Person and Phone Number:</b>	Megan Hamilton, <del>Associate</del> <u>Senior</u> Planner (619) 686-8113
<b>Project Location:</b>	2040 Harbor Island Drive San Diego, CA 92101
<b>Project Applicant's Name &amp; Address:</b>	HIW Associates, LP 2040 Harbor Island Drive San Diego, CA 92101
<b>Port Master Plan Designations:</b>	Harbor Island/Lindbergh Field: Planning District 2, Subarea West Harbor Island  Land Use: Commercial Recreation  Water Uses: Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Station

### 1.2 Introduction

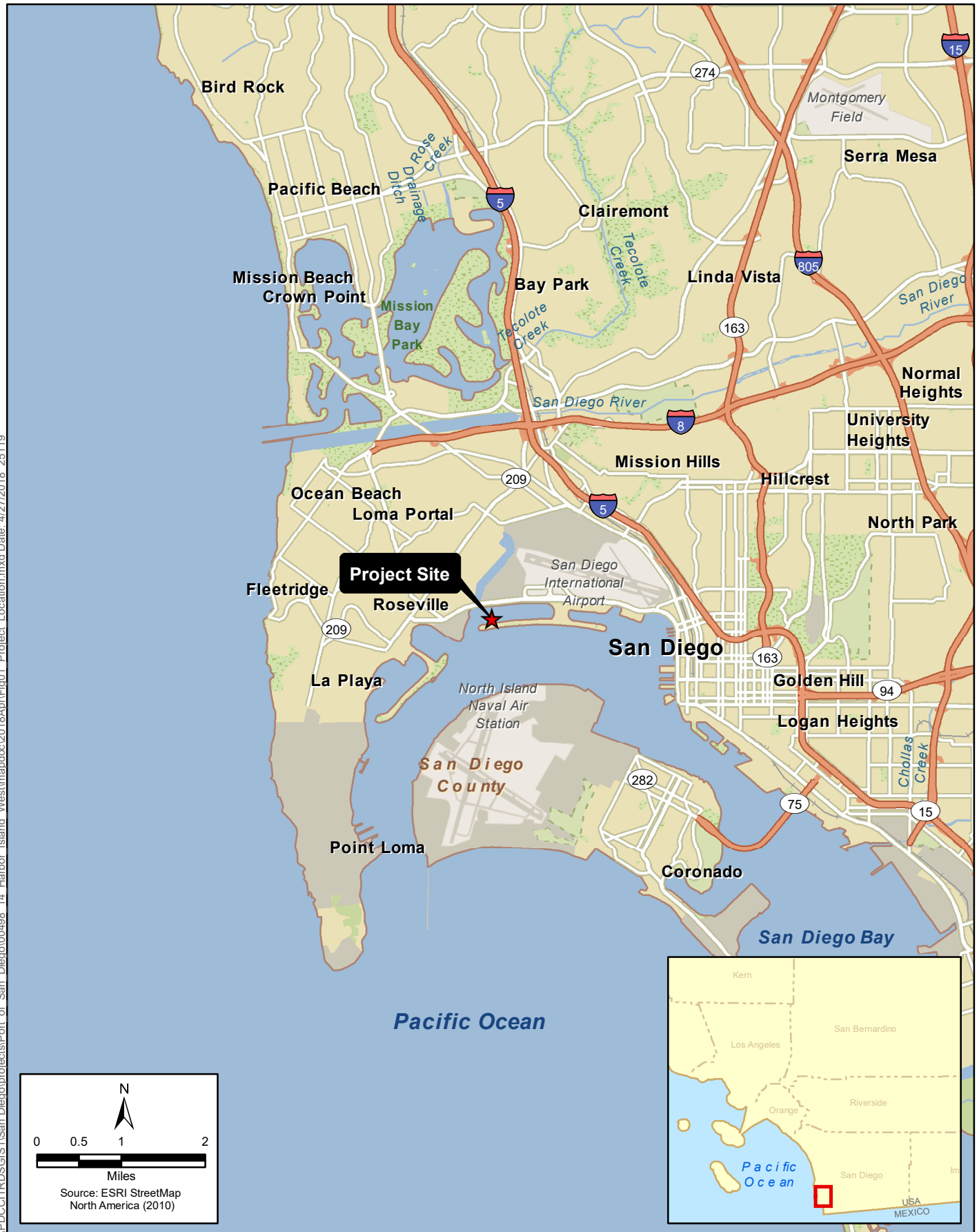
The Harbor Island West Marina Redevelopment Project (Project) includes the replacement and redevelopment of several elements comprising the Harbor Island West Marina (HIWM), an existing marina facility that provides services and amenities to the boating community and waterfront access opportunities to the public. The purpose of the proposed Project is to replace the existing aged dock structure, existing landside buildings, and infrastructure to accommodate a wider range of recreational vessel sizes, to create more slip opportunities for a greater diversity of boaters, and to extend the life of the HIWM to ensure its long-term viability.

As illustrated in Figure 1 (Regional Vicinity) and Figure 2 (Project Location), the Project site is located at 2040 Harbor Island Drive, San Diego, CA 92101 and is within Planning District 2 (Harbor Island/Lindbergh Field) of the certified Port Master Plan (PMP).

The proposed Project includes the following components: (1) demolition of 146,000 square feet of existing docks (providing 620 boat slips); (2) new construction of ~~139,218~~ 140,000 square feet of new docks (providing ~~623~~ 603 boat slips); (3) demolition of 23,000 square feet of existing building space and reconstruction of approximately 15,682 square feet of new building space; (4) removal of the 120,000-square-foot existing paved parking lot and installation of a new 116,000-square-foot paved parking lot; (5) removal of 15,000 square feet of existing landscaping with installation of approximately 18,000 square feet of new landscaping; (6) construction of a new 12-foot-wide public promenade and reconstruction of an existing 6,000-square-foot viewing deck for public use; and, (7) modernization of onsite utilities and lighting. The project proponent, HIW Associates, LP, also seeks a new ~~50~~ 40-year lease for construction, operation and maintenance of the proposed Project. As part of fulfilling BPC Policy No. 608 (Tenant Percent for Art Program), the proposed Project provides the for a public art component on the Project site which may include functional artwork along the proposed promenade and/or a contribution to the Coronado Bridge Lighting Project, provided that project is approved.



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**Figure 1**  
**Regional Vicinity**  
**Harbor Island West Marina Redevelopment Project**



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**Figure 2**  
**Project Location**  
**Harbor Island West Marina Redevelopment Project**



### 1.3 Project Background and Existing Site Conditions

Harbor Island was constructed in the early 1960s by hydraulically dredging, pumping, and depositing sand in the current configuration of Harbor Island. The HIWM was built between 1970 and 1972 and currently comprises eleven floating docks and landside improvements consisting of several buildings, shops, and paved parking (Figure 3 – Existing Conditions). The existing landside structures include 1 single-story, ~~and~~ 2 two-story wood-framed buildings, and a western restroom with a total plan footprint area of approximately 23,000 square feet. These buildings currently provide space for offices, lockers/storage, janitor facilities, laundry, a restaurant, snack bar, deli/food service, visitor-serving retail, mechanical maintenance facilities and a chandlery, as well as a club room and locker room for users of the marina. There is a large asphalt parking area with 351 parking stalls on the Project site. The existing waterside improvements include 146,000 square feet of docks with 620 boat slips.

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 (Figure 4 – Site Pictures).

Existing adjacent land uses to the Project site include the Hilton San Diego Airport/Harbor Island Hotel to the east; Tom Ham's Lighthouse Restaurant to the west; open water to the north; and Harbor Island Drive, Harbor Island Park, and North San Diego Bay to the south. Major circulation facilities in the area include North Harbor Drive, Rosecrans Street and Interstate 5 (I-5).



**Figure 3**  
**Existing Conditions**  
**Harbor Island West Marina Redevelopment Project**





Boathouse Front Facade



Back of Boathouse and View of Marina

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**Figure 4**  
**Site Pictures**  
**Harbor Island West Marina Redevelopment Project**

## Section 2 Project Description

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### 2.1 Project Characteristics

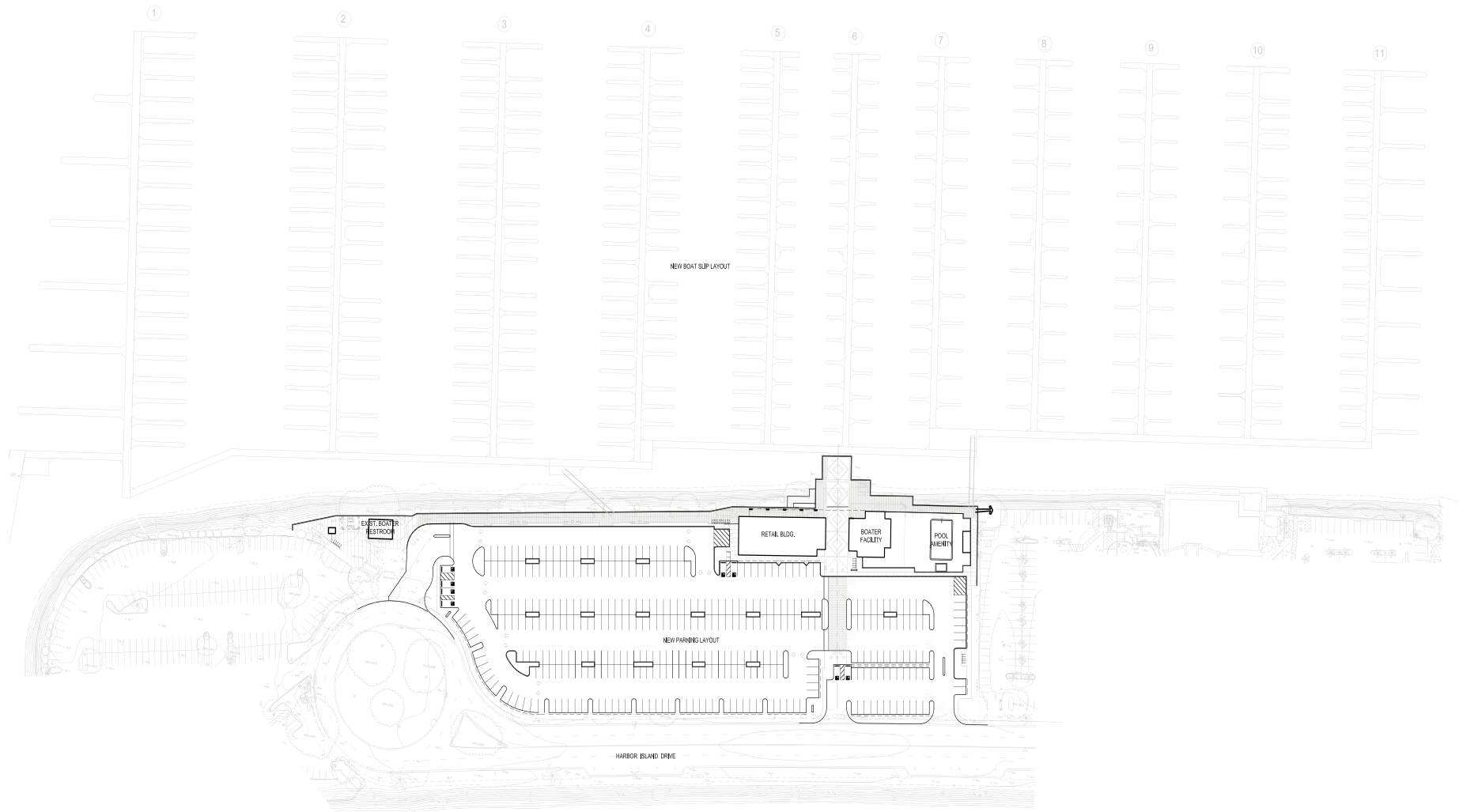
The proposed Project includes the repair, maintenance, replacement, and redevelopment of the HIWM. Specifically, the Project consists of the following elements as shown in Figure 5 (Proposed Site Plan) and Figure 6 (Conceptual Improvements).

- Demolition of 23,000 square feet of existing building space and reconstruction of approximately 15,682 square feet of new building space. Existing and new buildings have a maximum elevation of 45 feet above grade;
- Demolition of the existing 120,000-square-foot paved parking lot and construction of a new 116,000-square-foot paved parking lot;
- Removal of 15,000 square feet of existing landscaping with installation of approximately 18,000 square feet of new landscaping with an area for bicycle parking;
- Reconstruction of an existing 6,000-square-foot public viewing deck and construction of a new public 12-foot-wide promenade;
- Reconstruction of a 1,200-square-foot swimming pool and 75-square-foot Jacuzzi. The reconstructed pool remains the same size while the Jacuzzi increases from 75 square feet to 100 square feet.
- Demolition of 146,000 square feet of existing docks providing 620 boat slips and construction of 139,218 ~~140,000~~ square feet of new docks providing 623 ~~603~~ boat slips; and,
- Modernization of on-site utilities and lighting.

The Project also involves a proposed new 50~~40~~-year lease to HIW Associates, LP from the District for construction, operation, and maintenance of the proposed Project.

As part of fulfilling BPC Policy No. 608 (Tenant Percent for Art Program), the proposed Project includes the potential for a public art component on the Project site which may include functional artwork along the proposed promenade and/or a contribution to the Coronado Bridge Lighting Project.

Tables 1 and 2 also provide a summary of the existing conditions alongside improvements associated with the proposed Project.



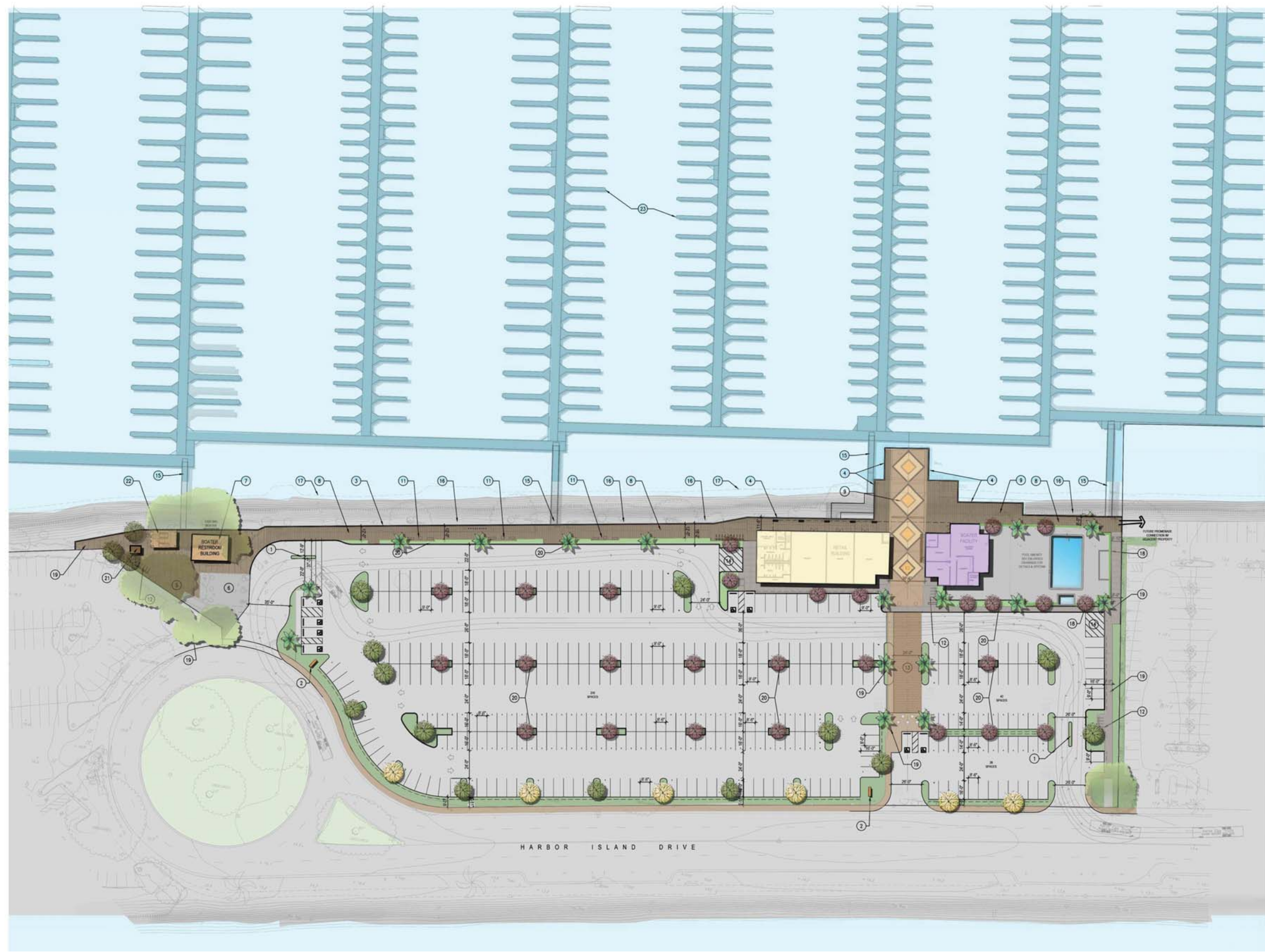
Note: The new layout will have 4 boater access ramps (similar to the existing layout).



**Figure 5**  
**Proposed Site Plan**  
**Harbor Island West Marina Redevelopment Project**



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VICINITY MAP N.T.S



BUILDING & PARKING SUMMARY

BUILDING	1ST FLOOR GROSS SF +/-	2ND FLOOR GROSS SF +/-	TOTAL
RETAIL BUILDING	4,990	4,990	9,980
MARINA BUILDING	2,500	2,500	5,000
WEST BOATER RESTROOM BUILDING	702		702
TOTAL	8,192	7,490	15,682

PARKING	PARKING SIZES			TOTAL
		STANDARD 8'-3" x 18'	COMPACT 7'-6" x 15'	
CITY STANDARD PROVIDED	9'x18'	8'-6" x 18'	8'-6" x 16'	
TOTAL	186	88	106	380
	48.9%	23.2%	27.9%	100.0%

KEY NOTES:

- 1 LANDSCAPE ISLAND
- 2 MONUMENT SIGN
- 3 EXISTING EDGE OF PAVEMENT
- 4 EXISTING EDGE OF STRUCTURE & PLATFORM
- 5 EXISTING LOADING AREA
- 6 EXISTING UNDERGROUND TANKS
- 7 EXISTING BOATER RESTROOM TO BE REMODELED
- 8 PROMENADE
- 9 MARINA TERRACE W/NEW WOOD DECKING
- 10 OPEN COURT
- 11 SEATING & POTTED PLANTER
- 12 BICYCLE PARKING
- 13 ENHANCED PAVING
- 14 BOATER LOADING ZONE
- 15 BOATER ACCESS RAMP
- 16 SLOPED AREA
- 17 LINE OF RIP RAP EDGE
- 18 POOL ENCLOSURE
- 19 CONNECTING WALKWAY
- 20 PLANTER
- 21 EXISTING EMERGENCY UTILITY/GAS SHUT-OFF TO REMAIN
- 22 PICNIC/BBQ AREA W/SHADE STRUCTURE
- 23 NEW BOAT SLIPS, TYPICAL



Figure 6  
Conceptual Improvements  
Harbor Island West Marina Redevelopment Project



### 2.1.1 Landside Improvements

A comparison of the existing landside conditions and the proposed improvements is presented below in Table 1. Figure 6 (Conceptual Improvements) shows the proposed landside layout while Figures 7 (Conceptual First Floor Plan) and 8 (Conceptual Second Floor Plan) show the 1<sup>st</sup> and 2<sup>nd</sup> level floor plans, respectively. Figures 9a through Figure 9e provide conceptual renderings of the proposed landside facilities.

**Table 1. Existing Conditions and Proposed Landside Improvements Summary**

Project Component	Existing Conditions		Proposed Improvements		Change from Existing Conditions
	Quantity	Component Area	Quantity	Component Area	
Buildings	<del>4</del> 3	23,000 sq. ft.	<del>3</del> 2	15,682 sq. ft.	Decrease of 7,318 square feet of building area; 1 fewer building
Landscaping	--	15,000 sq. ft.	--	18,000 sq. ft.	Increase of 3,000 square feet of landscaped area
Parking Lot Pavement	--	120,000 sq. ft.	--	116,000 sq. ft.	Decrease in 4,000 square feet of parking lot pavement
Parking Spaces	351	--	380	--	Increase in 29 parking spaces ( <u>12 available to the public</u> )
Public Promenade	--	N/A	--	900 linear ft.	Increase in 900 linear feet
Public viewing deck	1	6,000 sq. ft.	1	6,000 sq. ft.	Reconstructed, but same amount of area
Swimming Pool	1	1,200 sq. ft.	1	1,200 sq. ft.	Reconstructed, but same amount of area
Jacuzzi	1	75 sq. ft.	1	100 sq. ft.	Increase of 25 square feet
Bicycle Parking	0	--	25	--	Increase in 25 bicycle parking spaces

Source: HIW 2018

As summarized in Table 1, proposed changes to the landside portion of the Project site would involve the removal of three marina buildings and a western restroom that total 23,000 square feet and construction of two marina buildings and a western restroom that amount to approximately 15,682 square feet. The proposed marina buildings would be linked by a common linear roof plan that would create courtyard areas between the buildings. Existing landscaping would be removed and new drought-resistant landscaping would be installed, increasing the overall landscaped and pervious surface area from 15,000 square feet to 18,000 square feet. The existing asphalt parking lot would be demolished and repaved, resulting in a decrease from 120,000 square feet to 116,000 square feet of pavement area but an increase in 29 parking spaces, from 351 to 380. ~~Up to four~~ Twelve spaces would be available to the public.

Renovations to the existing public viewing deck, installation of a 12-foot-wide public promenade along the waterfront from the east end to the west end of the Project site, and an additional 25 bicycle parking spaces are also proposed as part of the landside improvements. No additional fill is required to construct the public viewing deck and public promenade. Figure 10 (Conceptual Site Circulation and Accessibility) illustrates proposed site circulation and accessibility routes on the Project site. Existing amenities (such as public restrooms, sailing clubs, and vessel rental operations) would be maintained and remain available to the public.



#### RETAIL BUILDING

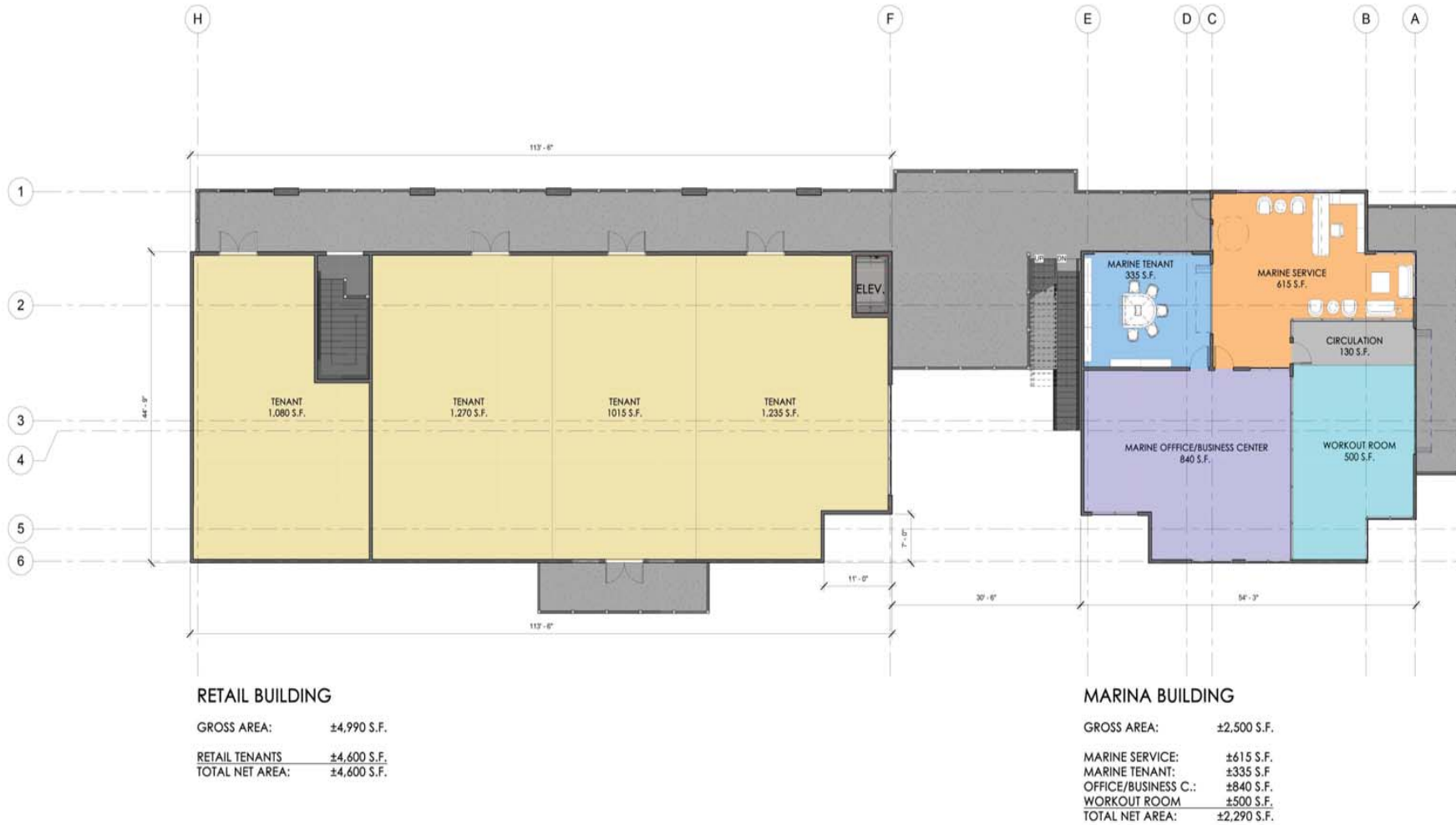
GROSS AREA:	±4,990 S.F.
RETAIL TENANTS:	±3,525 S.F.
LOCKERS / BIKE RENTAL	±200 S.F.
RENTAL OFFICE	±65 S.F.
RESTROOMS:	±570 S.F.
UTILITY:	±140 S.F.
JANITOR CLOSET	±35 S.F.
TOTAL NET AREA:	±4,535 S.F.

#### MARINA BUILDING

GROSS AREA:	±2,500 S.F.
BOATER LOUNGE:	±600 S.F.
LOUNGE'S STORAGE:	±40 S.F.
LAUNDRY ROOM:	±300 S.F.
LOCKERS:	±75 S.F.
OUTDOOR SHOWERS:	±100 S.F.
INDOOR SHOWERS:	±215 S.F.
RESTROOMS:	±490 S.F.
JANITOR/UTILITY	±100 S.F.
TOTAL NET AREA:	±1,920 S.F.



**Figure 7**  
**Conceptual First Floor**  
**Harbor Island West Marina Redevelopment Project**

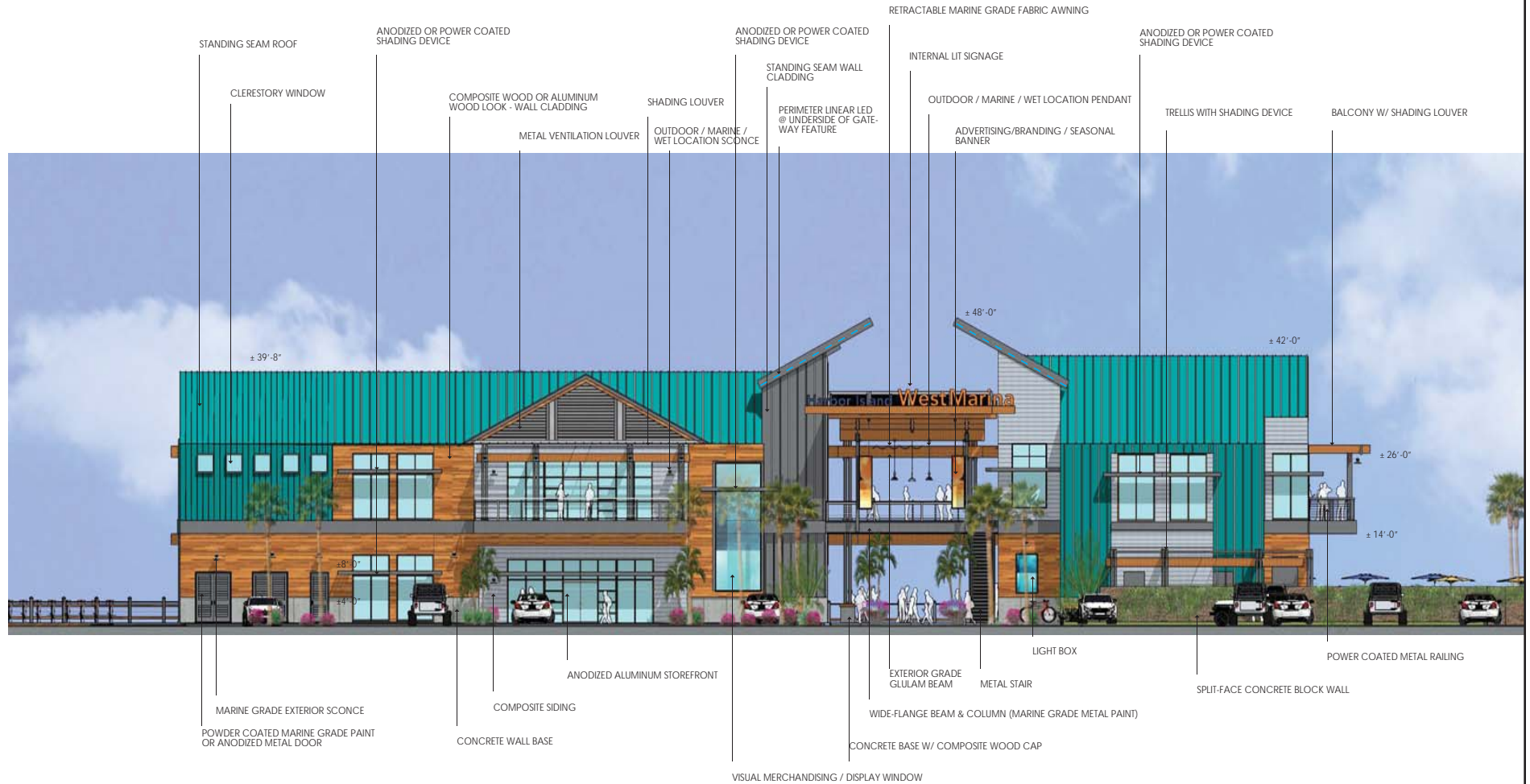


**Figure 8**  
**Conceptual Second Floor**  
**Harbor Island West Marina Redevelopment Project**





Figure 9a  
Conceptual Entrance View  
Harbor Island West Marina Redevelopment Project



**Figure 9b**  
**Conceptual Entrance Elevation**  
**Harbor Island West Marina Redevelopment Project**





Figure 9c  
Conceptual Harbor View  
Harbor Island West Marina Redevelopment Project



**Figure 9d**  
**Conceptual Harbor Elevation**  
**Harbor Island West Marina Redevelopment Project**



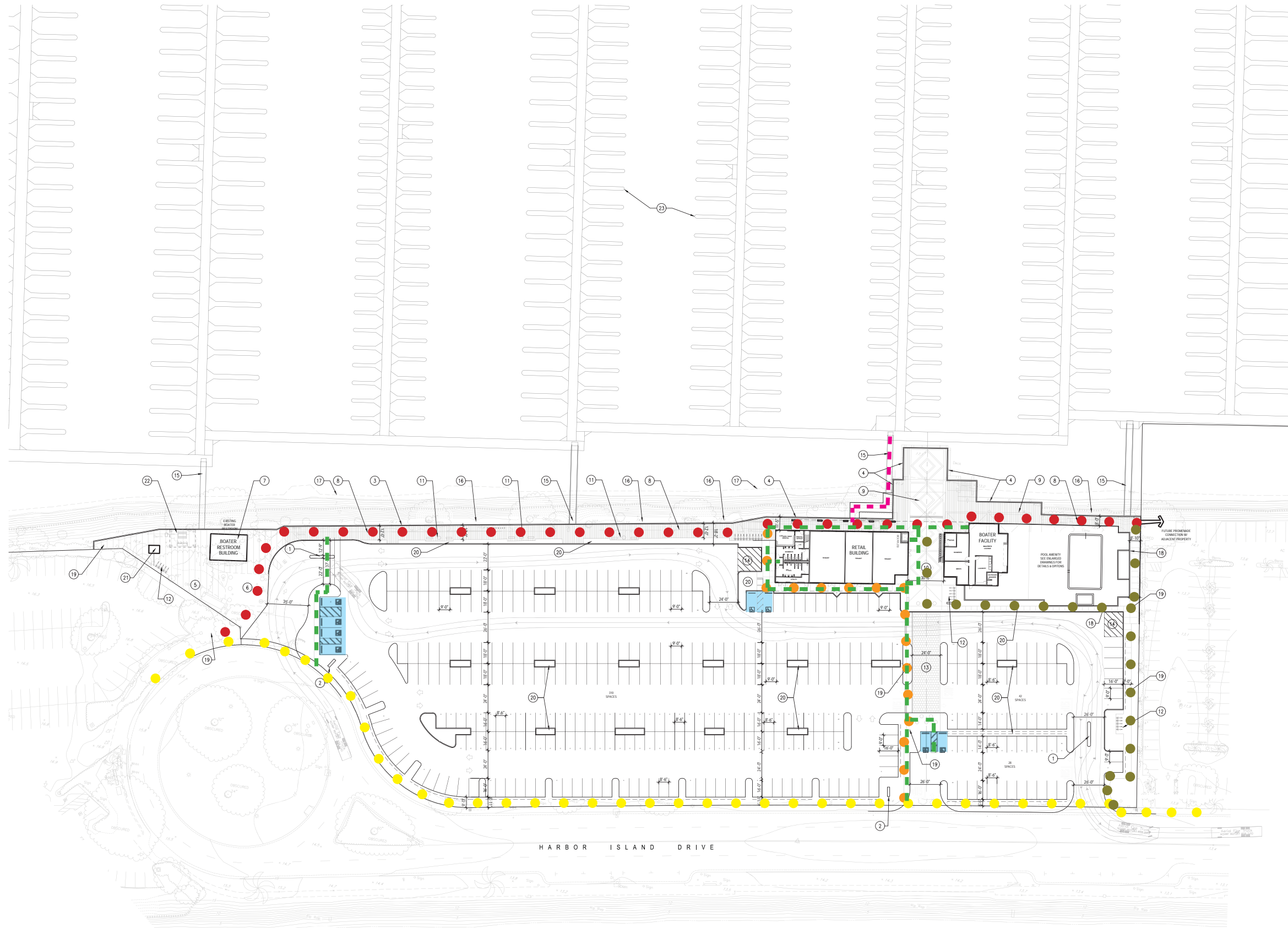




**Figure 9e**  
**Conceptual Pool Side Elevation**  
**Harbor Island West Marina Redevelopment Project**



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#### VICINITY MAP N.T.S



#### LEGEND

- PROMENADE WALK / ADA ACCESSIBLE
- TRANSITION WALK / ADA ACCESSIBLE
- TRANSITION WALK / ADA ACCESSIBLE
- PUBLIC SIDE WALK
- ADA PARKING - 8 PROVIDED
- ADA PATH OF TRAVEL
- PRELIMINARY ADA ACCESS (Subject To Further Development)

#### KEY NOTES:

- 1 LANDSCAPE ISLAND
- 2 MONUMENT SIGN
- 3 EXISTING EDGE OF PAVEMENT
- 4 EXISTING EDGE OF STRUCTURE & PLATFORM
- 5 EXISTING LOADING AREA
- 6 EXISTING UNDERGROUND TANKS
- 7 EXISTING BOATER RESTROOM TO BE REMODELED
- 8 PROMENADE
- 9 MARINA TERRACE W/NEW WOOD DECKING
- 10 OPEN COURT
- 11 SEATING & POTTED PLANTER
- 12 BICYCLE PARKING
- 13 ENHANCED PAVING
- 14 BOATER LOADING ZONE
- 15 BOATER ACCESS RAMP
- 16 SLOPED AREA
- 17 LINE OF RIP RAP EDGE
- 18 POOL ENCLOSURE
- 19 CONNECTING WALKWAY
- 20 PLANTER
- 21 EXISTING EMERGENCY UTILITY/GAS SHUT-OFF TO REMAIN
- 22 PICNIC/BBQ AREA W/SHADE STRUCTURE
- 23 NEW BOAT SLIPS, TYPICAL



**Figure 10**  
**Conceptual Site Circulation and Accessibility**  
**Harbor Island West Marina Redevelopment Project**

Landside improvements include the upgrade of utilities to current building standards and new light-emitting diode (LED) lighting would be installed throughout the Project site. In addition, the proposed Project would incorporate many features that conserve water and energy use. Increased energy efficiency would result in reduced energy usage by the redeveloped marina facility compared to the existing marina facility. Energy and water efficient features include:

- Use of LEDs throughout the Project site;
- Use of low-flow fixtures and appliances in the renovated buildings;
- Use of Energy-Star qualified appliances in kitchen(s);
- Landscaping would be drought resistant, designed to minimize irrigation and runoff and to promote surface infiltration where appropriate;
- Plants that are tolerant of saturated soil conditions would be used where landscaped areas retain or detain storm water;
- Use of automated irrigation systems; and
- Rain shutoff devices would be employed to prevent irrigation after precipitation.

## 2.1.2 Waterside Improvements

Table 2 provides a summary comparison of the existing waterside conditions and proposed improvements while Figure 11 (Proposed Slip Configuration) shows the proposed slip reconfiguration.

**Table 2. Existing Conditions and Proposed Waterside Improvements Summary**

Project Component	Existing Conditions		Proposed Improvements		Change from Existing Conditions
	Quantity	Component Area	Quantity	Component Area	
Docks	11	146,000 sq. ft.	<u>11</u> <del>40</del>	<u>139,218</u> <del>440,000</del> sq. ft.	Decrease of <u>6,782</u> <del>6,000</del> -square feet of dock area
Piles <sup>1</sup>	326	326 sq. ft.	<u>237</u> <del>313</del> <sup>2</sup>	<u>321</u> <del>383.55</del> sq. ft.	Decrease of <u>89</u> <del>89</del> piles, <u>decrease in 5</u> <u>sq.ft. increase in 57.55</u> <u>sq. ft. of pile area</u> <sup>3</sup>
Boat Slips	620	--	<u>623</u> <del>603</del>	--	<u>Increase of 3</u> <del>Decrease of 17</del> -boat slips
Dedicated Fire Standpipes <sup>4</sup>	0	--	<u>33</u> <del>30</del>	--	Increase in <u>33</u> <del>30</del> -fire standpipes
Boater Access Ramps	4	--	4	--	No change
Sanitary Pump Station	1	--	1	--	No change
Fuel Dock	1	--	1	--	<u>No change</u> <u>Replace in-kind</u>

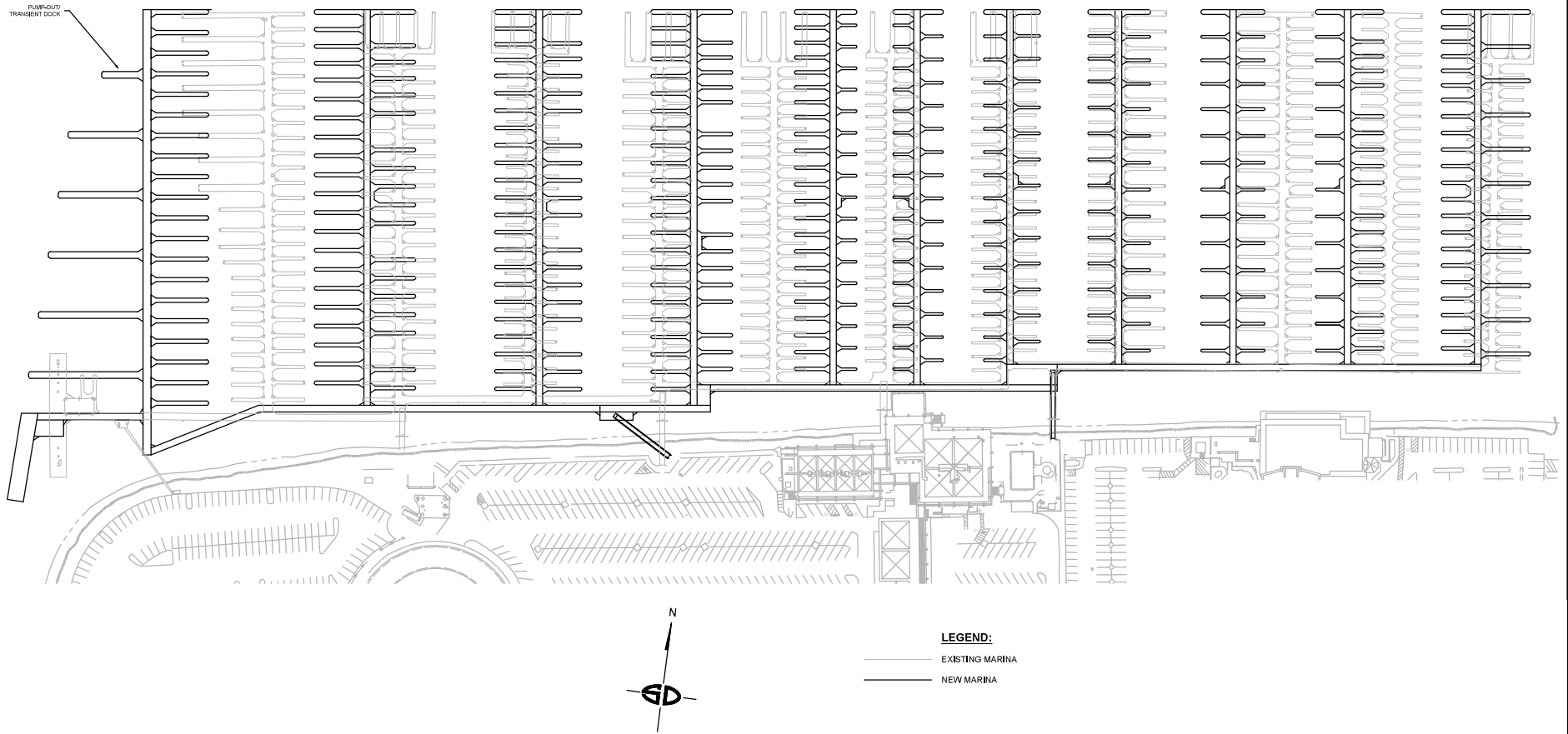
Source: HIW 2021-18

<sup>1</sup> Existing piles are 12-inch square concrete piles (approximately 1 square foot per each pile). New piles would be a combination of 14-inch square concrete piles (approximately 1.36 square feet each), and 18-inch square concrete piles (approximately 2.25 square feet each), and 20-inch square concrete piles (approximately 2.78 square feet each).

<sup>2</sup> Existing piles consist of 326 12-inch square concrete piles totaling 326 square feet. Proposed piles would consist of 237  
~~313~~ piles (189  
~~189~~ re-used 12-inch square concrete piles, 95  
~~95~~ 14-inch square concrete piles, and 29  
~~29~~ 18-inch square concrete piles)-totaling 321  
~~383.55~~-square feet.

<sup>3</sup> Pile square footage is part of the overall dock system square footage.

<sup>4</sup> Dedicated Fire Standpipes are a type of rigid water piping to which fire hoses can be connected, allowing manual application of water to the fire. A standpipe serves the same purpose as a fire hydrant.



**Figure 11**  
**Proposed Slip Configuration**  
**Harbor Island West Marina Redevelopment Project**

As summarized in Table 2, proposed changes to the waterside portion of the Project site include the demolition of the existing docks and construction of new docks. The existing docks are deteriorated and in need of replacement. The docks on site are composed of a main dock/headwalk with 11 dock/headwalk extensions. The proposed replacement docks would result in the reconfiguration of the 11 dock/headwalk extensions to reduce the footprint of the marina layout by reducing the width of some dock/headwalk extensions and reducing the number of proposed piles compared to existing. The reduction of the footprint would result in a reduction in the marina area from 146,000 square feet to 139,218 square feet (a 6,782-square-foot reduction in bay coverage), and the footprint of the piles from 326 square feet to 321 square feet. ~~two of the easternmost dock/headwalk extensions being consolidated into a single dock/headwalk extension. This would result in a total of 10 dock/headwalk extensions that would extend from the main dock/headwalk. The remaining dock configurations would not change.~~

The proposed changes to the dock/headwalk extensions would result in the realignment of the existing slips within the marina. The proposed changes to the dock and slip configuration would result in an increase in slips ~~reduction in the overall size of the current dock facility from 146,000 square feet to 140,000 square feet (a 6,000 square foot reduction in bay coverage), and approximately 17 fewer slips (from 620 slips to 603 slips).~~ While the reconstruction of the dock system would result in 17 fewer boat slips, ~~the~~ new dock system configuration would provide for a wider range of vessel sizes, including the ability to accommodate smaller vessels down to 12 feet-in-length, which are currently not serviced at the marina. The proposed slip mix would increase the number of tie-ups and slips for smaller vessels, and slips would continue to be available to the general public. Table 3 provides a summary of the proposed slip mix.

**Table 3. Proposed Slip Mix Summary**

Slip Range	Existing		Proposed	
	Slip Quantity	% of Total Slip Inventory	Slip Quantity	% of Total Slip Inventory
12 – 20 feet	0	0%	<del>57</del> <u>32</u>	<del>9.5</del> <u>5.14</u> %
21 – 25 feet	96	15.5%	<del>106</del> <u>115</u>	<del>17.6</del> <u>18.45</u> %
26 – 30 feet	111	17.9%	<del>55</del> <u>72</u>	<del>9.1</del> <u>11.55</u> %
31 – 35 feet	231	37.3%	<del>174</del> <u>195</u>	<del>28.9</del> <u>31.30</u> %
36 – 40 feet	106	17.1%	<del>73</del> <u>19</u>	<del>12.1</del> <u>3.05</u> %
41 – 45 feet	9	1.5%	<del>28</del> <u>44</u>	<del>4.6</del> <u>7.06</u> %
46 – 50 feet	44	7%	<del>44</del> <u>68</u>	<del>7.3</del> <u>10.91</u> %
Greater than 51 feet	23	3.7%	<del>66</del> <u>78</u>	<del>10.9</del> <u>12.52</u> %
<b>Total</b>	<b>620</b>	<b>--</b>	<b><del>603</del><u>623</u></b>	<b>--</b>

Source: HIW 2021~~14~~8

As identified in Table 2, the current marina dock configuration has 326 12-inch square concrete piles and 4 existing abutments for the dockside access ramps. ~~The proposed waterside improvements would reuse 189 piles, which is 58 percent of the existing piles. Approximately 124 new concrete piles would be required for the remainder of dock system installation. The proposed marina dock configuration would have a total of 237 313 concrete piles and includes both reused and new concrete piles.~~

The existing four abutments for the dockside access ramps are structurally sound and in stable condition (TerraCosta 2012). All existing abutments would be reused in the proposed waterside improvements. The number of access ramps and, pumpouts, ~~and the fuel dock configuration~~ would remain unchanged from existing conditions. ~~The fuel dock configuration would change but would not change in area.~~ In addition, no dredging is needed for the proposed waterside improvements.

The existing marina does not have a dedicated fire protection system and is currently serviced by individual fire extinguishers distributed throughout the docks. As part of the proposed improvements, approximately ~~33~~30 dedicated fire standpipes would be installed on the new docks along with a dedicated fire protection

system. The existing and proposed dock system includes secure gates controlled by an access system on the landside.

### 2.1.3 New Lease

The proposed Project includes a new lease between the District and HIW Associates, LP for a term of 5040 years. The uses in the lease would allow HIW Associates, LP to construct, operate, and maintain a recreational marina with 623 ~~603~~ boat slips along with associated ancillary facilities, including, but not limited to, deli/food service, retail, marine-related offices, and marina support facilities; customer parking; a public promenade and a public lookout deck; and the marina-related operations and businesses.

### 2.1.4 Construction

Construction of the proposed Project is expected to ~~begin in 2020 and~~ require approximately 24 months to complete over two phases. A phased construction schedule is proposed to allow portions of the marina to remain open to the public and businesses, as well as to avoid displacing boaters from the marina during construction. Public access to the waterfront would be available via portions of the promenade and two (of four) access gates that lead to the marina and would be delineated with signage. Phase I of construction is planned to ~~begin in 2020 and~~ last 12 months. It is anticipated that the existing docks would be demolished and rebuilt one dock at a time and that there is enough vacancy within the marina to accommodate marina users during construction. There is also excess capacity at nearby marinas should limited, temporary displacement of boaters occur. Phase II of construction is anticipated to occur between September and February ~~2024~~ and would end in the summer of ~~2022~~ two years after construction begins.

Table 4 lists the demolition and construction actions by phase and includes the area on the Project site to be affected, the equipment to be used, the duration, and the number of construction workers that would be employed. Figure 12 (Construction Phasing) provides the boundaries of Phase I and II of construction over an aerial of the Project site.

During demolition and construction of the proposed Project, approximately 16,860 cubic yards of construction debris from the demolished docks, buildings, and surface paving would be exported from the Project site. Excavation activities associated with new building foundations would require less than 1,000 cubic yards of soil to be exported from the Project site. All suitable construction and demolition materials would be recycled, which would include steel, concrete, wood, and glass. A minimum of 65 percent of applicable construction waste generated by the demolition and construction activities for the proposed Project would be diverted from the landfill to be recycled in compliance with the requirements of the City of San Diego's Construction and Demolition Debris Deposit Ordinance. The demolition of the existing dock system is anticipated to be disassembled by hand tools and a work boat. The disassembled pieces would then be rafted together with rope and floated to an onsite location where docks can be removed out of the water by either a land based crane, forklift, or waterside barge mounted crane. Removed docks and dock modules would then be hauled off to the landfill by truck.

The proposed new dock system would be manufactured off site in a controlled plant environment. The initial assembly of the individual dock modules begins in the plant by assembly of a wood waler system and hardware with each module kept separate for shipping. Once manufactured, the new dock modules are shipped to the Project site by truck. Similarly, new concrete piles are manufactured off site in a controlled plant environment with the manufactured piles shipped to the Project site by truck.

Once the dock and piles are delivered to the Project site, the docks are lowered into the water from truck by land based crane or forklift with the piles transported from truck to floating work barge by either barge mounted crane or land based crane. The dock modules are assembled and connected together by hand tools. A combination of jetting and pile driving are planned for the installation of piles. Specifically, piles are driven through predetermined openings in the dock system. Piles would be driven with the barge mounted crane equipped with a jet tube and either a diesel hammer or a drop hammer. In general, it is anticipated the piles would initially be jetted in place with an internal jet tube installed inside the pile. Piles would be jetted to within 5 feet, approximately, of design tip elevation and the rest would be installed by hammer. Pile jetting would be utilized for 80 to 90 percent of the time and an impact pile hammer would be used for the remaining 10 to 20 percent of the time.

**Table 4. Proposed Construction Summary**

Construction Activity	Construction Equipment	Duration (months)	# of Construction Workers
<b>Phase I Construction</b>			
Landside Improvements (West Portion of Project Site)			
Landscape Removal	Backhoe (1), wood chipper (1)	1	3
Parking Lot Demolition	Skip loader (1), excavator (1), backhoe (1)	1	4
Parking Lot Repaving	Paver (1), roller (1), grader (1), compactor (1), bobcat (1), striper (1)	1	3*
Restroom Building Demolition	Excavator (1), skip loader (1), grader (1)	1	4*
Restroom Building Construction	Backhoe (1), compressor (2), hand tools (various)	3	6
Waterside Improvements			
Demolition of Dock and Boat Slips	Landside crane (1) <sup>1</sup> , work boats (1) <sup>1</sup> , hand tools (various)	12	12
Construction of Dock and Boat Slips	Crane barge (1), impact pile driver (1), work boat (1), landside crane (1) <sup>1</sup>	12	12*
<b>Phase II Construction</b>			
Landside Improvements (East Portion of Project Site)			
Landscape Removal	Backhoe (1), wood chipper (1)	1	6
Parking Lot Demolition	Skip loader (2), excavator (1), backhoe (1)	2	4
Parking Lot Repaving	Paver (1), roller (1), grader (1), compactor (1), bobcat (1), striper (1)	1	4*
Building Demolition	Excavator (2), skip loader (2), grader (1), haul trucks (4)	2	10*
Building Construction	Crane, forklift, boom lift, compressor, hand tools	10	16
Landscape Installation	Trucks, hand tools	1	6*
<b>Total</b>		<b>24<sup>2</sup></b>	<b>37<sup>3</sup></b>

Source: HIW 2018

<sup>1</sup>Workboat and landside crane are assumed to be shared between dock demolition and installation

<sup>2</sup>The total construction period for the Project is expected to take approximately 24 months. The duration of specific phases of construction, as identified in the table, may overlap with other phases.

<sup>3</sup>This total represents the maximum number of workers that would be located on site at one time. The peak of construction would occur when Phase I demolition of docks, installation of docks, parking lot demolition, parking lot paving, and building construction overlap. This number does not equate to a sum of the column of the number of construction workers since several construction activities would have duplicate workers.

\* Represents duplicate workers





**Figure 12**  
**Construction Phasing**  
**Harbor Island West Marina Redevelopment Project**

~~As noted previously, some existing piles are planned to be moved and reused as part of the new dock system. These existing piles are anticipated to be pulled with barge-mounted crane with use of rope, chain, and jacking. In areas where existing piles would be used, the new dock would be installed around each existing piling. Once docks are assembled together and piles driven, the final dock assembly would take place and include installation of fendering, cover boards, pile guides, wet and dry utilities, fuel system and dock components including fire standpipes, power centers, and dock boxes. The final dock assembly would be completed by hand tools.~~

Construction of the proposed Project would be required to adhere to the recommendations of the geotechnical investigation prepared for the proposed Project (Appendices D and E) through the ministerial grading and building permits. Construction staging would occur within the confines of the Project site within a designated construction site, separated by a temporary barrier. During construction, up to 51 workers would be employed, with a maximum of 37 at one time, which would occur during Phase II's building construction.

During construction, the following landside equipment is anticipated to be used intermittently: backhoes, wood chippers, skip loaders, excavators, pavers, rollers, graders, compactors, air compressors, cranes, forklifts, boom lift, haul trucks, and other miscellaneous small equipment. Anticipated marine equipment would include a barge with crane, work boat, landside crane, haul trucks, and pile driving equipment. Not all of this equipment would be used for the entire duration of construction. 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.

Prior to construction activities, the Project proponent would coordinate with the City of San Diego's Development Services Department to obtain the necessary construction-related traffic control permit to address any 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 to the surrounding businesses would be maintained at all times, in a safe and efficient manner.

### **2.1.5 Operation**

Once the proposed Project is operational, existing uses within the leasehold (e.g., recreational boating, sailing academy, yacht brokers, deli/food service, marine services, maritime-related office tenant space, support/mechanical, laundry facilities, restroom/showers, workout room, boater's lounge, marine office/business center, and storage lockers) would continue in a manner similar to existing conditions, with use of marina facilities being driven by boaters in the marina. No new or expanded uses would result or increase the intensity of uses. Given the proposed decrease in the total building square footage and slight ~~reduction-increase~~ in the number of boat slips, both employees and visitors accessing and using the Project site are expected to be similar to the existing condition.

## **2.2 Compatibility with Port Master Plan**

### **2.2.1 Existing Land Use Designations**

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 (District 2017a). 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 (CCC) 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 proposed Project is located within Planning District 2 (Harbor Island/Lindbergh Field) of the certified PMP. As illustrated in Figure 13 (Existing Land and Water Use Designations), 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 specific land and water use designations for the Project site include Commercial Recreation, Recreation Boat Berthing, Fueling Dock, and Sanitary Pump Dock. The proposed Project is compatible with the existing land and water use designations and does not propose to change any of the use designations.

## 2.3 Regulatory Requirements, Permits, and Approvals

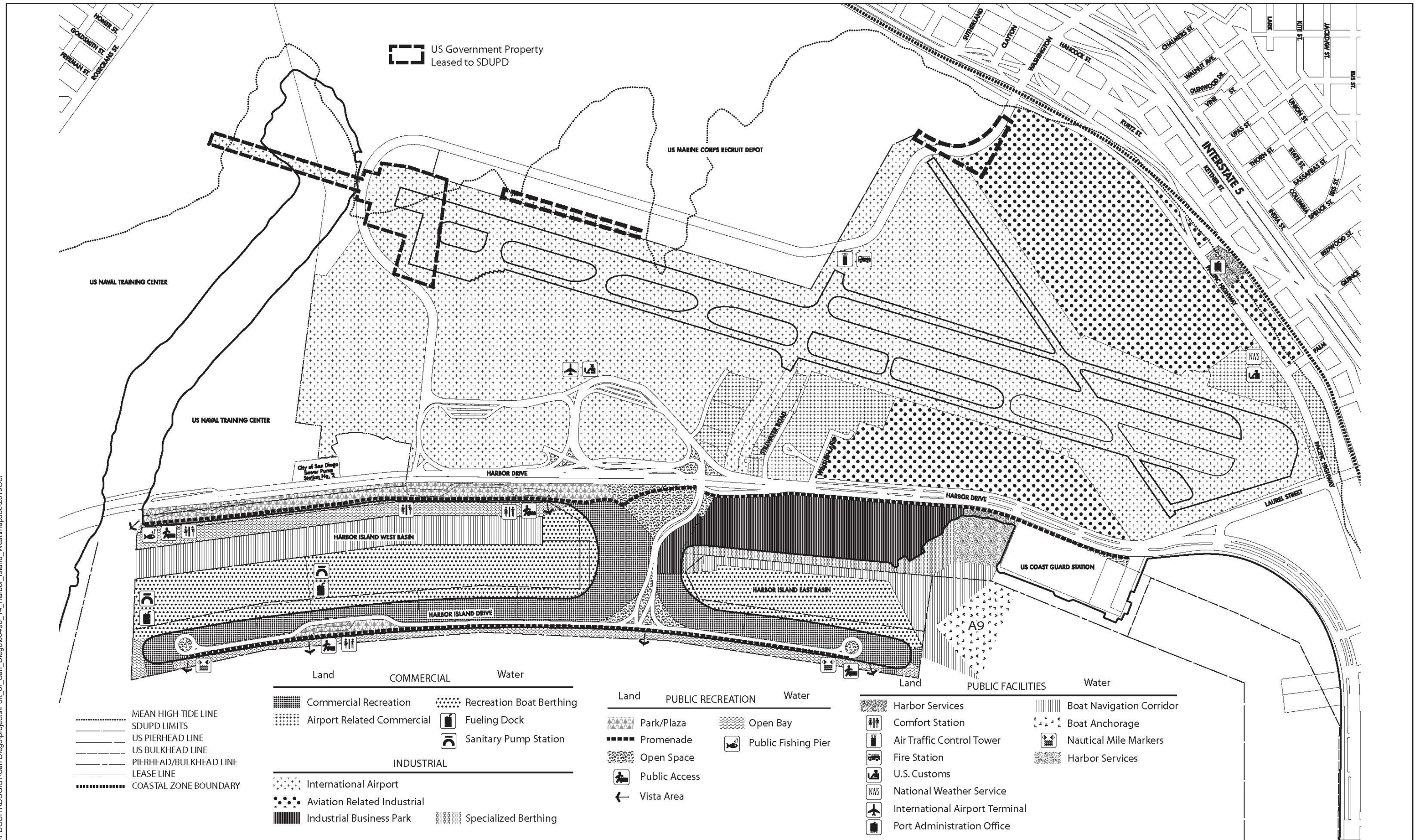
The District is the primary approval authority for the proposed Project. District authorizations include:

- Adoption of the Mitigated Negative Declaration in compliance with the California Environmental Quality Act (CEQA).
- Issuance of an appealable Coastal Development Permit (CDP) in compliance with the Coastal Act. All regulatory requirements identified in this document will be incorporated as standard conditions of the CDP.
- Approval of the plans and specifications, as well as concept approval for the proposed Project.
- Granting of a new ~~50~~40-year lease for the proposed Project.

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

- San Diego Regional Water Quality Control Board – Stormwater Construction General Permit (including the development and implementation of a Storm Water Pollution Prevention Plan) and Clean Water Act Section 401 Water Quality Certification.
- U.S. Army Corps of Engineers – Clean Water Act Section 404 and Rivers and Harbors Act Section 10 permit application for discharge of “fill” materials and structures to waters of the U.S.
- Federal Aviation Administration notification and approval.





**Figure 13**  
Existing Land and Water Use Designations  
Harbor Island West Marina Redevelopment Project





## Section 3 Environmental Factors Potentially Affected

An Initial Study is conducted by a Lead Agency to determine if a project may have a potentially significant effect on the environment. An EIR must be prepared if an Initial Study indicates that further analysis is needed to determine whether a significant impact will occur or if there is substantial evidence in the record that a project may have a significant effect on the environment. The environmental factors checked below would be potentially affected by this project, involving at least one impact that may require mitigation to reduce the impact from "Potential Impact" to "Less than Significant with Mitigation." The potential impacts and mitigation are described in the Initial Study Checklist.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                                    | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality                              |
| <input checked="" type="checkbox"/> Biological Resources               | <input type="checkbox"/> Cultural Resources               | <input checked="" type="checkbox"/> Geology/Soils                 |
| <input type="checkbox"/> Energy  | <input type="checkbox"/> Greenhouse Gas Emissions         | <input checked="" type="checkbox"/> Hazards & Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology/Water Quality            | <input type="checkbox"/> Land Use/Planning                | <input type="checkbox"/> Mineral Resources                        |
| <input type="checkbox"/> Noise   | <input type="checkbox"/> Population/Housing               | <input type="checkbox"/> Public Services                          |
| <input checked="" type="checkbox"/> Recreation                         | <input type="checkbox"/> Transportation                   | <input type="checkbox"/> Tribal Cultural Resources                |
| <input type="checkbox"/> Utilities/Service Systems                     | <input type="checkbox"/> Wildfire                         |   |
| <input checked="" type="checkbox"/> Mandatory Findings of Significance |   |   |

On the basis of this initial evaluation:

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

Signature: \_\_\_\_\_

Wileen Manaois  
Director, Development Services

Date: 12.5.2019

## Section 4 Environmental Initial Study Checklist

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant with Mitigation" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from other areas of the initial study may be cross-referenced).

C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

### I. Aesthetics

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

The HIWM is located on an approximately 25.77-acre site (3.81 acres of land area and 21.96 acres of water area) on/adjacent to Harbor Island, approximately 2.4 miles west of downtown San Diego, 0.6 mile south of the San Diego International Airport (SDIA), 0.6 mile east of Shelter Island, and 0.9 mile north of Coronado. The Project site is located in an urbanized area surrounded by the Hilton Hotel to the east, Tom Ham's Lighthouse Restaurant to the west, Harbor Island Drive and Harbor Island Park to the south, and Harbor Island Basin to north. The Project site is designated as Commercial Recreation, and Recreational Boat Berthing, Fueling Dock and Sanitary Pump Dock in the District's PMP (District 2017a).

Existing waterside areas on the Project site consist of a marina with a main dock, headwalk, dock, headwalk extensions, access ramps, and boat slips. Existing landside areas on the Project site include one single-story and two two-story buildings containing space for offices, lockers/storage, janitor facilities, laundry facilities, restaurant, snack bar, deli/food service, liquor store, club room, mechanical maintenance facilities, ~~and a chandlery, and a western restroom~~. There is also a large asphalt parking area with 351 parking stalls on the Project site. The Project site is relatively flat with vegetation consisting of ornamental trees and shrubs. Six PMP-designated Vista Areas are located on Harbor Island. No Vista Area is located on the Project site and the closest Vista Area to the proposed Project is located 0.04 mile southwest of the Project site (District 2017a). One officially designated state scenic highway, State Route (SR) 75 (Silver Strand Highway and San Diego - Coronado Bridge) is located approximately 3.7 miles southeast of the Project site (Caltrans 2017).

### **Analysis of Environmental Impacts**

#### ***a. Would the project have a substantial adverse effect on a scenic vista?***

**Less Than Significant Impact.** The PMP identifies Vista Areas on District tidelands. Six Vista Areas are located on Harbor Island as identified in Figure 13, (Existing Land and Water Use Designations); however, none of the six Vista Areas are located on the Project site or oriented toward the Project site. Specifically, the nearest PMP-designated Vista Area to the Project site is located approximately 0.04 mile southwest of the site; however, this Vista Area is oriented toward San Diego Bay and not in the direction of the Project site. Similarly, the three other Vista Areas located along Harbor Island Drive are also oriented toward San Diego Bay and not in the direction of the Project site. The remaining two Vista Areas along Harbor Drive are oriented toward the closed end of the Harbor Island West Basin and the United States Naval Training Center (NTC) and not in the direction of the Project site.

Due to the nature of the proposed Project, which proposes to replace an existing marina with similarly sized, oriented, and massed buildings and facilities, the orientation of the Vista Areas, and the distance of the Vista Areas from the Project site, none of the designated Vista Areas would be affected by the proposed Project. During the construction period, views would be temporarily changed from an active boat marina facility to a construction site. However, construction equipment would be moved around the site and removed from the site once it is no longer needed, and the views would return back to an active boat marina facility once construction is complete. The view during operation of the proposed Project would be the same or very similar to the current HIWM. Therefore, there would be a less than significant impact on scenic vistas and no mitigation measures are required.

#### ***b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?***

**No Impact.** One state scenic highway, SR-75 (Silver Strand Highway and San Diego-Coronado Bridge) is located approximately 3.7 miles southeast of the Project site (Caltrans 2017). The San Diego-Coronado Bay Bridge spans the bay, connecting the City of San Diego to the City of Coronado. Views from the bridge are expansive and encompass the entire San Diego Bay, downtown San Diego, SDIA, San Diego Naval Base, Coronado/Naval Air Station (NAS), and the Pacific Ocean. Although the Project site is just visible from portions of SR-75, views of the Project site would not be striking or noticeable because of the distance that exists between the site and the scenic highway. Furthermore, motorists traveling on SR-75 would generally be focused on the roadway in front of them. Their southerly views while traveling westbound or eastbound would not be prolonged, and viewer sensitivity to the proposed changes would be very low. Therefore, the proposed Project would not affect any trees, rock outcroppings, or historic buildings within SR-75.

In addition, no designated scenic resources are located on the Project site or in the immediate vicinity. While there are some ornamental trees within the Project site, none would be considered significant scenic resources. No rock outcroppings or historic buildings are located within the Project site. Therefore, due to the distance of the state scenic highway from the Project site and the absence of scenic resources within the Project site, no impact on state scenic highways would occur as a result of Project implementation and no mitigation measures are required.

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

**Less Than Significant Impact.** The Project site is located within an urbanized area that provides public views of the Bay. The PMP governs the scenic quality of the project. The PMP makes provisions for visual access to the shoreline in a manner that is consistent with the activities being conducted on the land and water areas involved as well as the proprietary interests of private land owners, lessees, and the public. The PMP identifies major visual access points. There is an identified vista area south of the project site (from the roundabout at the west end of Harbor Island drive looking toward San Diego Bay). There is also an identified vista area north of the site (south of North Harbor Drive and just east of the North Harbor Drive Bridge, looking southwest toward the West Basin channel). The project would not interfere with any of these identified visual access points. In addition, the project is consistent with the land and water use designations identified in the PMP (see Section XI, *Land Use and Planning*).

A PMP goal related to scenic quality is as follows: “Views should be enhanced through view corridors, the preservation of panoramas, accentuation of vistas, and shielding of the incongruous and inconsistent.” Redevelopment of the HIWM would occur within the existing HIWM footprint and would not cause permanent view changes at the site or in the surrounding area because the proposed Project would not result in a substantial increase in the size or bulk of structures or features on the Project site or damage the visual characteristics of the site. In addition, the proposed improvements would be consistent with the existing use of the site. The improvements would appear to be similar in scale and in character to the existing condition (an existing active marina facility). Therefore, the proposed Project would not conflict with zoning or other regulations governing scenic quality. Impacts would be less than significant, and no mitigation measures would be required.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

**Less Than Significant Impact.** The Project site and surrounding area are developed with several existing sources of light and glare and also developed with an existing marina that generates light. Primary sources of lighting include street lighting along Harbor Island Drive and building/parking lot lighting from adjacent land uses (e.g., Tom Ham’s Lighthouse and Hilton Hotel). Nearby sources of daytime glare include glass window surfaces at Tom Ham’s Lighthouse Restaurant and the Hilton Hotel. Nighttime lighting sources also include adjacent restaurant and hotel buildings and SDIA.

In order to meet operational and safety requirements, the proposed Project would include energy-efficient replacement lighting on the marina facility, marina docks, and parking lot. The replacement light fixtures would be consistent with the existing fixtures and would provide downcast, directional light to focus illumination and minimize spillover light and glare impacts on the surrounding area, while still providing sufficient operational and safety lighting for the facility. The proposed lighting would not constitute a new source of substantial light or glare that would affect day or nighttime views in the area because it is consistent with existing lighting in the area and on the Project site. The Project site and surrounding area are currently urbanized and developed with several sources of existing light and glare, including street lights, pole lights, hotels, restaurants, and the airport. In addition, the City of San Diego maintains regulations pertaining to outdoor lighting and glare in their Municipal Code (Section 142.0740 for lighting and Section 142.0730 for glare). The Project would be required to comply with the City of San Diego’s light and glare regulations, which include rules for minimizing light spill and limits for reflective materials with a light reflective factor greater than 30 percent. Additionally, construction of the proposed Project would be completed during the day, so construction night lighting would not be required. As a result, the proposed Project would not affect day or nighttime views in the area by creating a new source of substantial light or glare. Impacts would be less than significant and no mitigation measures would be required.

## II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Department of Conservation (1997) 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:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

The Project site has operated as a marina facility since 1972. The Project site is designated as commercial with Commercial Recreation (landside) and Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Dock (waterside) uses in the District's PMP (District 2017a). According to the California Department of Conservation (DOC), the Project site is not located on Farmland or forest land (DOC 2016), nor is it under a Williamson Act contract (DOC 2013). There are no local policies for agricultural or forest resources that apply to the Project site.

### **Analysis of Environmental Impacts**

***a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

**No Impact.** The Project site is not currently an active agricultural use nor is the site planned or zoned for agricultural uses. The Project site is designated as Commercial with Commercial Recreation (landside) and Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Dock (waterside) uses in the District's PMP. It is currently developed and will remain developed with a marina facility. Additionally, there are no agricultural resources or operations in the vicinity of the Project site that would be affected by the proposed Project. According to Important Farmland maps prepared by the California DOC, the Project site and adjacent land is identified as Urban and Built-Up Land (DOC 2016). Neither construction nor operation of the proposed Project would impact Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impacts would occur and no mitigation measures are required.

***b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

**No Impact.** According to DOC's San Diego County Williamson Act Lands Map, the entire Project site is designated as Urban and Built-up Land, and no Williamson Act lands occur on the site (DOC 2013). Therefore, construction and operation of the proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No impacts would occur and no mitigation measures are required.

***c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

**No Impact.** The Project site is not zoned for and does not contain forest land, timberland, or timberland zoned Timberland Production (District 2017a). The Project site is designated as Commercial Recreation (landside) and Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Dock (waterside) in the District's PMP and is currently developed with a marina facility. Therefore, construction and operation of the proposed Project would not conflict with existing zoning for forestland or timberland. No impacts to forest land or timberland would occur and no mitigation measures are required.

***d. Would the project result in the loss of forest land or conversion of forest land to non-forest use?***

**No Impact.** No forest land is located within the Project site or the vicinity of the Project site. The operation and construction of the proposed Project would not result in the loss of forest land or convert forest land to non-forest use. No impacts would occur to forest land would occur and no mitigation measures are required.

***e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?***

**No Impact.** The area surrounding the Project site is characterized primarily by commercial recreation uses with a strip of parkland to the south that is used as a grassy area and pedestrian walkway. The surrounding area does not include existing agriculture or forest land. Construction and operation of the proposed Project would not result in changes to land use that would result in the conversion of farmland or forest land to non-agricultural or non-forest use. No impacts would occur and no mitigation measures are required.



### III. Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Environmental Setting

Emissions modeling has been prepared for the proposed Project (Appendix A), which was used, along with other information, in this section to evaluate the potential air quality impacts of the proposed Project. Air quality management agencies of direct importance in San Diego County are the United States Environmental Protection Agency (EPA), California Air Resources Board (CARB), and the San Diego Air Pollution Control District (SDAPCD). EPA has established federal air quality standards for which CARB and SDAPCD have primary implementation responsibility. CARB and SDAPCD are also responsible for ensuring the federal and state air quality standards (NAAQS and CAAQS, respectively) are met.

EPA and CARB have established NAAQS and CAAQS, respectively, for six criteria pollutants: ozone, CO, lead (Pb), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), particulate matter 10 microns or less in diameter (PM<sub>10</sub>), and particulate matter (PM) 2.5 microns or less in diameter (PM<sub>2.5</sub>). Ozone is considered a regional pollutant because its precursors affect air quality on a regional scale. Pollutants such as CO, NO<sub>2</sub>, SO<sub>2</sub>, and Pb are considered local pollutants that tend to accumulate in the air locally. PM is both a local and a regional pollutant. The project includes construction activities and demolition of existing marina uses. The primary emission sources associated with these activities are equipment and vehicle exhaust, as well as earthmoving, demolition, and paving. Criteria pollutants generated by the project emission sources are ozone precursors (ROG and NO<sub>x</sub>), CO, and PM. Accordingly, these pollutants are the criteria pollutants of concern associated with the Project.<sup>1</sup>

All criteria pollutants can have human health and environmental effects at certain concentrations. The ambient air quality standards for these pollutants (Table 5) are set to protect public health and the environment with an adequate margin of safety (Clean Air Act Section 109). Epidemiological, controlled human exposure, and toxicology studies evaluate potential health and environmental effects of criteria pollutants and form the scientific basis for new and revised ambient air quality standards.

<sup>1</sup> As shown in Table 5, there are also ambient air quality standards for sulfur dioxide, lead, sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particulates. However, these pollutants are typically associated with industrial sources, which are not included as part of the project. Accordingly, they are not evaluated further.

**Table 5. Federal and State Ambient Air Quality Standards**

Criteria Pollutant	Average Time	CAAQS	NAAQS <sup>1</sup>	
			Primary	Secondary
Ozone	1 hour	0.09 ppm	None <sup>2</sup>	None <sup>2</sup>
	8 hours	0.070 ppm	0.070 ppm	0.070 ppm
Respirable Particulate Matter (PM10)	24 hours	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
	Annual mean	20 µg/m <sup>3</sup>	None	None
Fine Particulate Matter (PM2.5)	24 hours	None	35 µg/m <sup>3</sup>	35 µg/m <sup>3</sup>
	Annual mean	12 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup>	15 µg/m <sup>3</sup>
Carbon Monoxide	8 hours	9.0 ppm	9 ppm	None
	1 hour	20 ppm	35 ppm	None
Nitrogen Dioxide	Annual mean	0.030 ppm	0.053 ppm	0.053 ppm
	1 hour	0.18 ppm	0.100 ppm	None
Sulfur Dioxide <sup>3</sup>	Annual mean	None	0.030 ppm	None
	24 hours	0.04 ppm	0.014 ppm	None
	3 hours	None	None	0.5 ppm
	1 hour	0.25 ppm	0.075 ppm	None
Lead	30-day Average	1.5 µg/m <sup>3</sup>	None	None
	Calendar quarter	None	1.5 µg/m <sup>3</sup>	1.5 µg/m <sup>3</sup>
	3-month average	None	0.15 µg/m <sup>3</sup>	0.15 µg/m <sup>3</sup>
Sulfates	24 hours	25 µg/m <sup>3</sup>	None	None
Visibility-reducing Particles	8 hours	-- <sup>4</sup>	None	None
Hydrogen Sulfide	1 hour	0.03 ppm	None	None
Vinyl Chloride	24 hours	0.01 ppm	None	None

Source: California Air Resources Board 2016.

<sup>1</sup> National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.

<sup>2</sup> The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for State Implementation Plans.

<sup>3</sup> The annual and 24-hour NAAQS for SO<sub>2</sub> apply only for 1 year after designation of the new 1-hour standard to those areas that were previously in nonattainment for 24-hour and annual NAAQS.

<sup>4</sup> CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer – visibility of 10 miles or more due to particles when relative humidity is less than 70%.

ppm= parts per million; µg/m<sup>3</sup> = micrograms per cubic meter; NAAQS = National Ambient Air Quality Standard; CAAQS = California Ambient Air Quality Standard

The Project site is located within the San Diego Air Basin (SDAB). The Project site is in an area designated nonattainment for the following standards:

- The eight-hour NAAQS and CAAQS for ozone;
- The CAAQS for PM10; and
- The CAAQS for PM2.5.

The SDAPCD is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and state air quality laws. Most notably, SDAPCD Rule 20.2 (New Source Review Non-Major Stationary Sources) establishes Air Quality Impact Analysis (AQIA) Trigger Levels, which set emission limits for non-major new or modified stationary sources.

## **Analysis of Environmental Impacts**

### ***a. Would the project conflict with or obstruct implementation of the applicable air quality plan?***

**No Impact.** The air quality plans relevant to the proposed Project are the *2016 Ozone Attainment Plan for San Diego County* (Ozone Plan; SDAPCD 2016a), *2020 Plan for Attaining the National Ozone Standards* (2020 Ozone Plan; SDAPCD 2020), and the Regional Air Quality Strategy (RAQS; SDAPCD 2016b). The Ozone Plans outline SDAPCD's plans and control measures designed to attain the ozone NAAQS, while the RAQS outlines SDAPCD's plans and control measures designed to attain the ozone CAAQS. Consistency with the Ozone Plans and RAQS is typically determined by two standards. The first standard is whether the proposed Project would exceed growth assumptions contained in the plans. The second standard is whether the proposed Project would increase the frequency or severity of existing air quality violations, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as specified in the Ozone Plans and RAQS. The Ozone Plans and RAQS rely on information from CARB and the San Diego Association of Governments (SANDAG), including mobile and area source emissions and projected growth in San Diego County, to forecast future emissions and determine strategies necessary for the reduction of emissions through regulatory controls. CARB's mobile source emissions projections and SANDAG's growth projections are based on population and vehicle use trends, local general plans, local coastal programs, and other applicable land management plans such as the PMP. As such, projects that propose development consistent with, or less than, the growth projections anticipated by applicable land management plans would be consistent with the Ozone Plans and RAQS.

For the proposed Project, the PMP is the document governing future land and water use within the Project site. The existing marina, along with the other elements of the PMP, was considered as part of SANDAG's projections and incorporated into SANDAG's 2050 Regional Plan, which provides socioeconomic data for the formulation and development of Ozone Plan and RAQS. Construction of the proposed Project would comply with SDAPCD rules that have been implemented to reduce regional particulate matter and ozone emissions—including Rule 50 (Visible Emissions), Rule 51 (Nuisance), Rule 52 (Particulate Matter), Rule 54 (Dust and Fumes), Rule 55 (Fugitive Dust Control), and Rule 67 (Architectural Coatings).<sup>2</sup> In addition, short-term construction related employment as a result of the proposed Project would not have a significant effect on population levels. Operation of the proposed Project would not result in a change in existing land or water use designations as the proposed improvements would allow for the continuation of marina uses. The proposed Project would also not result in any long-term changes to population, land use, transportation system, or additional stationary sources of air pollutant emissions. As a result, the proposed Project would not result in any changes to demographic forecasts or planned land use development.

Since the proposed Project is consistent with the projections assumed in ~~the PMP, and~~ the Ozone Plans and RAQS, construction and operation of the proposed Project would not conflict with or obstruct implementation of applicable air quality plans. No impacts are anticipated to occur, and no mitigation measures are required.

### ***b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?***

**Less Than Significant Impact.** As noted previously, the Project site is considered a nonattainment area for the PM<sub>10</sub>, PM<sub>2.5</sub>, and ozone CAAQS and the ozone NAAQS. Certain individuals residing in areas that do not meet the CAAQS or NAAQS could be exposed to pollutant concentrations that cause or aggravate acute and/or chronic health conditions (e.g., asthmas, lost work days, premature mortality). Due to the regional nature of ozone, and the fact that thresholds take into account past, present, and future projects and set a regional threshold in consideration of current and future projects, regional air quality thresholds (discussed below) serve as thresholds for both direct and indirect project-related impacts and as an indication of whether a project's cumulative contribution would be significant.

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<sup>2</sup> All Rules listed can be accessed at [https://www.sdapcd.org/content/sdc/apcd/en/Rule\\_Development/Rules\\_and\\_Regulations.html](https://www.sdapcd.org/content/sdc/apcd/en/Rule_Development/Rules_and_Regulations.html)

### Construction

Increases in criteria pollutant emissions are mainly attributable to construction activities associated with the repair, maintenance, and replacement of several elements comprising the HIWM. Emissions generated by construction of the proposed landside and waterside improvements would include the following: fugitive dust from surface disturbance and demolition activities; combustion pollutants from heavy construction equipment, worker vehicles, heavy duty vehicles, and workboats; and evaporative emissions from architectural coatings and paving. Concentrations of these emissions are generally highest near the construction site and dissipate as a function of distance.

Construction emissions were estimated based on information from the Project Applicant and the California Emissions Estimate Model (CalEEMod™) model, an air quality modeling program that estimates air pollution emissions in pounds per day or tons per year for various land use development projects. Project-specific inputs to the CalEEMod™ model include Project land use types, size in acres and square feet, start and end dates of construction phases, heavy-duty equipment types and operating hours, volumes of structures to be demolished, areas to be paved, painted, and graded, and haul, material, and worker trips. Emissions generated by the workboat required to install the new dock were estimated using workboat model year and horsepower from the *Port of San Diego 2016 Maritime Air Emissions Inventory* (District 2018a) and emission factors based on the methodology presented in CARB's commercial harbor craft model (CARB 2010).

Construction of the proposed Project is expected to take a total of approximately 24 months, completed over two phases (Phase I and Phase II). During that time, a variety of construction equipment would be used intermittently, including cranes, excavators, air compressors, pavers, and other miscellaneous small equipment. All equipment would not be used during each construction phase. However, the maximum construction emissions for each phase, assuming concurrent use of applicable equipment for that phase, has been analyzed. Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) would also occur. As noted above, emissions from a workboat would also be generated during dock installation.

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

SDAPCD Rule 20.2, which outlines these screening level thresholds (SLTs), states that any project “which results in an emissions increase equal to or greater than any of these levels, must (SDAPCD 2016c):

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

For projects whose stationary-source emissions are below these criteria, no AQIA is typically required, and project level emissions are presumed to be less than significant. For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions (e.g., stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality (Table 6).

**Table 6. Air Quality Thresholds**

Pollutant	Daily (pounds per day)	Annual (tons/year)
NO <sub>x</sub>	250	40
VOC <sup>1</sup>	75	13.7
PM <sub>10</sub>	100	15
PM <sub>2.5</sub>	55	10
SO <sub>x</sub>	250	40
CO	550	100
Lead	3.2	0.6

Source: SDAPCD Regulation II, Rule 20.2 (SDAPCD 2016c); SCAQMD 2019

<sup>1</sup> The terms VOC and ROG are used interchangeably, although ROG is used in this analysis for consistency with CalEEMod. The County of San Diego's 75 pounds per day emissions rate is based on threshold levels from Coachella Valley, which have similar ROG emission sources and ozone attainment status as the SDAB.

VOC = Volatile Organic Compounds;

NO<sub>x</sub> = oxides of nitrogen;

CO = carbon monoxide;

SO<sub>x</sub> = oxides of sulfur;

PM<sub>10</sub> = particulate matter 10 microns or less in diameter or inhalable particulate matter;

PM<sub>2.5</sub> = particulate matter 2.5 microns or less in diameter or fine particulate matter

**Table 7. Summary of Construction Emissions (pounds per day)**

Construction Activity	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Phase I (2019)</b>						
Demolition of docks	<1	1	1	<1	1	<1
Installation of docks	3	32	22	<1	2	1
Building Demolition	1	12	10	<1	1	1
Parking Lot Demolition	1	14	13	<1	1	1
Landscape Removal	<1	<1	<1	<1	<1	<1
Building Construction	1	6	6	<1	1	<1
Parking Lot Paving	3	28	17	<1	2	1
<b>Maximum Daily Phase I<sup>1</sup></b>	<b>9</b>	<b>93</b>	<b>69</b>	<b>&lt;1</b>	<b>7</b>	<b>5</b>
<b>Thresholds</b>	<b>75</b>	<b>250</b>	<b>550</b>	<b>150</b>	<b>100</b>	<b>55</b>
<b>Does Phase I Exceed Thresholds?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Phase II (2020)</b>						
Parking Lot Demolition	1	8	9	<1	3	1
Building Demolition	1	15	15	<1	2	1
Landscape Removal	1	7	7	<1	1	<1
Building Construction	2	17	15	<1	2	1
Landscape Installation	<1	<1	<1	<1	<1	<1
Parking Lot Paving	3	31	20	<1	2	2
<b>Maximum Daily Phase II<sup>2</sup></b>	<b>5</b>	<b>40</b>	<b>38</b>	<b>&lt;1</b>	<b>6</b>	<b>3</b>
<b>Thresholds</b>	<b>75</b>	<b>250</b>	<b>550</b>	<b>150</b>	<b>100</b>	<b>55</b>
<b>Does Phase II Exceed Thresholds?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Emissions modeling (Appendix A)

<sup>1</sup> Maximum daily emissions for all pollutants would occur during concurrent construction of all phases except landscaping removal.

<sup>2</sup> Maximum daily emissions for all pollutants would occur during parking lot demolition, building demolition, and building construction.



As shown in Table 7, construction emissions from the proposed Project would be below thresholds for all nonattainment criteria pollutants and their precursors. Furthermore, the proposed Project would be required to comply with SDAPCD rules that have been implemented to reduce regional particulate matter and ozone emissions. These rules include Rule 50 (Visible Emissions), Rule 51 (Nuisance), Rule 52 (Particulate Matter), Rule 54 (Dust and Fumes), Rule 55 (Fugitive Dust Control), and Rule 67 (Architectural Coatings). Therefore, construction of the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment for and would not contribute to significant human health impacts.<sup>3</sup> Impacts associated with construction would be less than significant, and no mitigation measures are required.

#### Concurrent Construction and Operation

As shown in Appendix A, demolition of the existing docks and installation of the new docks will be completed during Phase I. Use of the new docks could begin immediately thereafter ~~in 2020~~. Accordingly, concurrent construction of Phase II and recreational boating activity would occur ~~during 2020~~. ~~Because~~ While the proposed Project would ~~reduce~~ slightly increase the number of boating slips, emissions of all pollutants ~~except~~ NO<sub>x</sub> from recreational boating and onroad visitor trips would decrease slightly for VOC, CO, and PM<sub>2.5</sub>; result in no change for PM<sub>10</sub>; and slightly increase for NO<sub>x</sub> under the Project, relative to existing conditions, as shown in Table 8.<sup>4</sup> This operational (mostly) decrease would overlap with Phase II construction, resulting in a slight increase in lower emissions in 2020 ~~than reported above~~ relative to baseline during this period where construction and operations overlap. Table 9 summarizes combined emissions during Phase II construction with the net change in emissions from recreational boating and onroad visitor trips anticipated in 2020 (Phase I operations). Recreational boating emissions were quantified using emission factors from CARB's Pleasure Craft Inventory Model and slip assignments by boat type based on expected boat length by boat type and size. Emissions from onroad visitor trips were quantified using CalEEMod and vehicle trip information from the traffic engineer (Appendix G). Refer to Appendix A for the modeling outputs.

**Table 8. Summary of 2020-Phase I Operational Emissions (pounds per day)**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Existing Operations						
Recreational Boating	91	6	150	<1	4	3
Vehicle Trips	5	17	45	<1	9	3
Total Existing	96	23	195	<1	13	6
Project Operations						
Recreational Boating	<u>86 80</u>	<u>10 9</u>	<u>152 139</u>	<1	<u>4 3</u>	3
Vehicle Trips	4	14	37	<1	9	2
Total Project Operation	<u>90 84</u>	<u>24 23</u>	<u>189 176</u>	<1	<u>13 12</u>	5
<b>Net Phase 1 Operation<sup>1</sup></b>	<b><u>6 12</u></b>	<b><u>1 1</u></b>	<b><u>6 19</u></b>	<b>&lt;1</b>	<b><u>1 1</u></b>	<b>-1</b>

Source: Emissions modeling (Appendix A)

<sup>1</sup> Project operations minus existing conditions.

<sup>3</sup> The SLTs are determined to be those threshold under which a project's emissions would not contribute to exceedances of applicable air quality standards, which themselves represent the allowable atmospheric concentrations at which the public health and welfare are protected, and include a reasonable margin of safety to protect the more sensitive receptors in the population. Regional air quality thresholds of significance take into consideration existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed from the findings of a wide range of scientific evidence that demonstrates that there of known safe concentrations of criteria pollutants.

<sup>4</sup> While fewer total boating slips will be issued under the Project, more slips for larger boats (36 to greater than 51 feet) will be allowed. In general, larger boats have a higher emissions intensity per operating hour than smaller vessels. For some pollutants (e.g., NO<sub>x</sub>), the increased emissions from additional larger boats offsets emissions reductions from fewer total boating slips, resulting in an overall minor NO<sub>x</sub> emission increase relative to existing conditions (see Table 8). While the project would only increase boating slips by three slips, more slips for larger boats (36 feet to greater than 51 feet) will be allowed. In general, larger boats have a higher emissions intensity per operating hour than smaller vessels.

**Table 9. Summary of ~~2020~~ Concurrent Phase II Construction Emissions and Phase I Operational Emissions (pounds per day)**

Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Phase II Max Daily Construction (see Table 67)	5	40	38	<1	6	3
Phase I Operation (see Table 8) <sup>1</sup>	6 -44	1	6 -45	<1 <0	<1 -4	-1 <0
Total Emissions	-6-1	41	2332	<1	56	2
Thresholds	75	250	550	150	100	55
Does Concurrent Construction Exceed Thresholds?	No	No	No	No	No	No

Source: Emissions modeling (Appendix A)

<sup>1</sup> Represents the net change in recreational boating emissions with implementation of the proposed Project relative to existing conditions. Because all existing docks would be demolished, and new docks installed prior to ~~2020~~Phase II, the full change reduction in recreational boating activity and associated emissions was assumed to occur when Phase II construction begins in 2020. The entire change in on-road vehicle activity and emissions resulting from the Project were assigned to Phase I operations. This assumption is conservative because some Project vehicle trips would not occur until Phase II is completed. However, most on-road visitor trips are associated with boating activity, which will be fully replaced following Phase I.

As shown in Table 9, concurrent construction and operational emissions in ~~2020~~ from the proposed Project are expected to be below thresholds for all nonattainment criteria pollutants and their precursors. However, it is still possible that the proposed Project, when combined with current construction projects, could result in localized air quality impacts such as the effects from particulate matter. The radius for localized PM impacts is typically the immediate vicinity of the project site, or up to 0.25 mile. There are no current projects within 0.25 mile of the proposed Project's construction boundaries. Moreover, any such project would be subject to the same SDAPCD rules and regulations that would reduce construction emissions from the Project, including fugitive dust control in accordance with Rule 55. Therefore, this impact would be less than significant, and no mitigation measures are required.

#### Long-Term Project Operation

Operational criteria pollutant emission impacts are generally associated with any change in the permanent use of the Project site by area, energy, and mobile sources. Area source emissions are generated by landscaping activities, consumer products (e.g., personal care products), and periodic painting for facility upkeep. Energy sources include emissions from natural gas combustion for heating requirements. Mobile source emissions would result from vehicle and recreational boating trips associated with the HIWM. As discussed above, Project construction would demolish the existing marina uses, including 146,000 square feet of existing docks and 22,000 square feet of building space. Operation of these uses currently generates area, energy, and mobile source emissions, which would be effectively replaced with operational emissions associated with the Project. The difference, or *delta*, in operational emissions between the existing uses and the Project represents the net new impact of the Project analyzed in this analysis.

Criteria pollutant emissions associated with the existing marina uses and the Project were estimated using CalEEMod and emission factors from the 2016 Maritime Air Emissions Inventory (Port of San Diego 2018a; CARB 2010). Vehicle trip information for existing and Project conditions was provided by the traffic analysis (Appendix G). Emissions from area sources, including landscaping activities, consumer products, and architectural coatings, were modeled using CalEEMod default values. Emissions associated with existing natural gas combustion were calculated based on historic utility data. Natural gas consumption by the proposed Project was assumed to be 48 percent less than existing conditions, based on the reduced building space and energy efficient design features described in Chapter 2, *Project Description* (e.g., Energy-Star certified appliances).

Estimated operational emissions under both existing and Project conditions are summarized in Table 10. The Project was assumed to be fully operational three years after construction begins in ~~2024~~. The

difference in operational emissions between the Project and the existing land uses represents the net change associated with Project implementation. Refer to Appendix A for the modeling outputs.

**Table 10. Summary of Operational Emissions (pounds per day)**

Condition/Source	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Existing Conditions (2018)</b>						
Area Source	1	<1	<1	<1	<1	<1
Energy Source	<1	1	1	<1	<1	<1
Mobile Source (vehicles)	5	17	45	<1	9	3
Mobile Source (boating)	91	6	150	<1	4	3
Total Existing Conditions	<u>9697</u>	24	196	<1	13	6
<b>Project Conditions (2021)</b>						
Area Source	1	<1	<1	<1	<1	<1
Energy Source	<1	<1	<1	<1	<1	<1
Mobile Source (vehicles)	4	<u>1314</u>	<u>3437</u>	<1	9	2
Mobile Source (boating)	<u>8086</u>	<u>910</u>	<u>139152</u>	<1	<u>34</u>	3
Total Project Conditions	<u>8491</u>	<u>2324</u>	<u>174189</u>	<1	<u>4213</u>	5
<b>Net Emissions</b>						
Project minus Existing	<u>-126</u>	<u>-10</u>	<u>-227</u>	<u>&lt;00</u>	<u>-10</u>	<u>&lt;0.1</u>
<b>San Diego County AQIAs</b>	<b>75</b>	<b>250</b>	<b>550</b>	<b>150</b>	<b>100</b>	<b>55</b>
<b>Does Net Operation Exceed AQIA Levels?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

As shown in Table 10, operation of the proposed Project would result in a reduction in all nonattainment criteria pollutant emissions and their precursors, relative to existing conditions. This is an air quality benefit that will contribute to cumulative improvements in regional and localized air quality. The decrease in emissions is due to the reduction in total building area and number of boating slips. The proposed Project would and the replacement of the existing buildings with modern buildings constructed to the most recent California Building Code (CBC) standards (2019).

Regional air quality thresholds of significance taken into consideration existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS at a regional level. Because the SLTs are reflective of regional emissions levels, projects that generate regional criteria pollutant and ozone precursor emissions below these thresholds to be minor in nature and would not adversely affect air quality such that the NAAQS or CAAQS would be violated. Since the proposed Project would not exceed regional air quality thresholds, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment for and would not contribute to significant human health impacts. A less than significant impact would occur as a result of the proposed Project.

**c. Would the project expose sensitive receptors to substantial pollutant concentrations?**

**Less Than Significant Impact.** This analysis discusses criteria pollutants, diesel particulate matter (DPM), and carbon monoxide (CO) impacts as it relates to the sensitive receptors near the proposed Project. The closest sensitive land use is Harbor Island Park, approximately 400 feet southeast of the marina, and the closest residential use is the military housing located approximately 1,650 feet northwest of the Project site.

High levels of criteria pollutants are associated with possible health risk (e.g., asthma, asphyxiation), which is highly dependent on many interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). However, as noted above, with respect to regional criteria pollutants, SLTs are considered appropriate to

determine whether a proposed project may increase regional criteria pollutant levels such that NAAQS or other standards would be exceeded, which would trigger health concerns. The EPA develops and considers the quantitative characterizations of exposures as well as the associated risks to human health or the environment in a process known as the Health Risk and Exposure Assessment (HREA). The HREA estimates mortality (e.g., incidents of death) and morbidity (e.g., incidents of reduced lung function) effects associated with a full range of observed pollutant concentrations as part of the analysis (EPA 2014). However, existing models have limited sensitivity to small changes in criteria pollutant concentrations and, as such, translating project-generated criteria pollutants to specific health effects using the regional models would not produce meaningful information.

As shown in Table 7, construction emissions from the proposed Project would be below the regional thresholds. Due to the minor amount of construction emissions, the limited exposure of nearby recreational and residential receptors to these pollutants, and the distance of receptors from the site, health effects associated with these criteria pollutants during construction would not occur. As discussed above, operation of the proposed Project would mostly reduce emissions relative to existing conditions, which is an emissions and public health benefit. Therefore, increased adverse health effects associated with criteria pollutants during operation would not occur.

Similarly, construction activities related to the proposed Project would result in emissions of DPM, which is classified as a carcinogenic toxic air contaminant (TAC) by the CARB, from heavy equipment used on site and truck traffic to and from the site, as well as minor amounts of other TACs from motor vehicles. Health effects from TACs are usually described in terms of cancer risk. An incremental cancer risk threshold of 10 in one million is established by the SDAPCD. "Incremental Cancer Risk" is the likelihood that a person continuously exposed to concentrations of TACs and is typically based on a 30- or 70-year exposure duration. Construction would occur over 2 years, which is considerably shorter than the 30- to 70-year exposure duration associated with chronic cancer health risks. As shown in Table 7, PM10 emissions generated during construction would be minor, with maximum emissions between 6 to 7 pounds per day. Roughly half of these PM10 emissions are the result of fugitive dust, which is not a carcinogenic TAC. Moreover, wind in the project area blows predominately from the northwest in a southeasterly direction (CARB 2019). As such, the nearest residential receptors (military housing) are located up-wind from the project site. Receptors that access the recreational uses to the south of the Project would have infrequent exposure to diesel exhaust, with exposure limited to visitation that coincides with weekday construction activities. Harbor Island Park is also 400 feet from the marina; because DPM emissions decrease dramatically as a function of distance from the source, pollutant concentrations at the park will be substantially lower than at the Project site (CARB 2005). As such, there would be no adverse health effects from construction-generated DPM at the nearest receptor locations.

Once operational, the proposed Project is not expected to ~~in~~ increase visitation or intensity of uses at the Project site because waterside marina usage drives use of landside marina facilities, and the number of marina slips is only increasing by three ~~decreasing~~; therefore, operation of the proposed Project over the next ~~50~~40 years would not result in an increase in DPM emissions (refer to Table 8). Therefore, increased adverse health effects associated with DPM during construction and operation would not occur.

Motor vehicle emissions would not be concentrated in any one area but would be dispersed along travel routes and would not be anticipated to cause a significant CO emission. Furthermore, the proposed Project would not expand the existing HIWM use. Rather, the proposed Project would reduce the number of vehicle trips and associated mobile source emissions (refer to Table 8). Therefore, the proposed Project would not expose sensitive receptors to substantial CO concentrations in excess of the health protective CAAQS or NAAQS, and therefore, would not expose sensitive receptors to significant pollutant concentrations that could result in adverse health effects. This impact is considered less than significant, and no mitigation measures are required.

***d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

**Less Than Significant Impact.** According to CARB's *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, petroleum refineries, and livestock operations (CARB 2005). Potential odor emitters during construction

activities include diesel exhaust, asphalt paving, and the use of any architectural coatings to paint paved surfaces. Construction-related operations would be temporary in nature, and construction activities would not be likely to result in nuisance odors that would violate SDAPCD Rule 51. Additionally, all construction equipment is required to be maintained in accordance with the manufacturers' specifications, and all construction equipment would be turned off when not in use. Therefore, odors during construction would not adversely affect a substantial number of people and would not be a significant impact.

Potential odor emitters during operations would include occasional gasoline odors from the fueling station and gasoline odors from normal boat and vehicle use. However, odor exposure would be limited to the circulation routes, parking areas, and areas immediately adjacent to fueling and boating activities. It is anticipated that no new odors would be generated during the operation of the proposed Project as it would result in the continuation of an existing use and no new, expanded, or additional uses are proposed. Therefore, impacts would be less than significant, and no mitigation measures would be required.



## IV. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

The environmental setting description for biological resources is based on a comprehensive database review, a site visit by an ICF biologist, and the Harbor Island West Marina Marine Updated Baseline Eelgrass Resources Report, Harbor Island West Marina Updated Eelgrass Resources and Impact Report (2022), and Harbor Island West Marina Marine Biological Resources Report, both all prepared by Marine Taxonomic Services, Ltd. ~~on April 2, 2018~~ (Appendix B, B1, and C). The landside portion of the Project site consists of approximately 3.81 acres in an urbanized area while the waterside portion of the Project site consists of approximately 21.96 acres within San Diego Bay. A description of vegetation habitat types and species observed on site is provided below.

The proposed landside improvements are located on a site which is completely developed with buildings, pavement, parking lots, and landscaped areas. As identified in the HIWM Marine Biological Resources Report, habitat within the landside portion of the Project site is identified as Urban/Developed. This type of land cover consists of paved areas and developed areas. Vegetation within this type of land cover is limited to ornamental landscaping, situated in planters or medians, to provide visual screening and decoration along local roadways and the Project's site surface parking.

The proposed waterside improvements are located in San Diego Bay which is characterized by a wide range of marine habitats including soft bottom, which predominates in the bay, eelgrass (*Zostera marina*), and artificial hard substrates primarily associated with piers and jetties. Habitat types identified within the waterside portion of the Project site included unvegetated soft bottom, vegetated soft bottom, docks and pilings, riprap, and open water. The majority of the survey area is loosely consolidated soft bottom, ranging in depth from intertidal to -17-feet mean lower low water (MLLW). The intertidal portions are mostly shoreline rip-rap while the soft bottom habitats start at approximately -1-foot MLLW (low intertidal). Shallow shoreline areas typically have a greater content of fine sands that quickly transitions to mud in deeper water. Table 11 provides a summary of the plants and animals observed within the Project survey area during the marine biological survey.

**Table 11. Plant and Animal Species Observed**

Habitat	Plant and Animal Species Observed	
	Plant and Algae Species	Invertebrates/Animal Species
Unvegetated Soft Bottom	No plants <u>or algae</u> were observed during survey	<u>Invertebrates:</u> Tube-dwelling anemone ( <i>Pachycerianthus fimbriatus</i> ), Sea pens ( <i>Sylatula elongata</i> ), Bivalves, Burrowing anemones, Amphipods, Infaunal polychaetes, Jackknife clam ( <i>Tagelus californianus</i> ), Exotic colonial bryozoan ( <i>Zoobotryon verticillatum</i> ), Spiny lobster ( <i>Panulirus interruptus</i> ), California aglaja ( <i>Navanax inermis</i> ), Cloudy bubble snails ( <i>Bulla gouldiana</i> ),  <u>Fishes:</u> Round stingrays ( <i>Urobatis halleri</i> ), Diamond turbot ( <i>Hypsopsetta guttulata</i> ), California halibut ( <i>Paralichthys californicus</i> ), Barred sand bass ( <i>Paralabrax nebulifer</i> ), Spotted sand bass ( <i>Paralabrax maculatofaciatus</i> )
Vegetated Soft Bottom	Eelgrass ( <i>Zostera marina</i> ), Gracilarioid red alga (Family Gracilariaceae), green alga ( <i>Ulva lactuca</i> )	<u>Invertebrates:</u> Tube-dwelling Anemone, Bivalves, Burrowing anemones, Amphipods, California aglaja, Cloudy bubble snails  <u>Fishes:</u> Round stingrays, Barred sand bass, Spotted sand bass, <u>Pacific seahorse</u> ( <i>Hippocampus ingens</i> ) <del>Pacific seahorse</del> ( <i>Hippocampus ingens</i> ), <del>Tube dwelling Anemone</del> , <del>Bivalves</del> , <del>Burrowing anemones</del> , <del>Amphipods</del> , <del>California aglaja</del> , <del>Cloudy bubble snails</del>
Docks and Piles	<del>Barnacles</del> ( <i>Balanus glandula</i> and <i>Chthamalus</i> sp.), <del>tunicates</del> ( <i>Styela clava</i> , <i>Ciona</i> sp., <i>Botrylloides</i> spp., and others), <del>sponges</del> , <del>oysters</del> ( <i>Ostrea lurida</i> ), <del>Soft bryozoan</del> ( <i>Zoobotryon verticillatum</i> ), <del>Encrusting bryozoans</del> ( <i>Eurystomella</i> sp.), <del>Hydroids</del> , Green alga ( <i>Enteromorpha</i> sp. and <i>Ulva lactuca</i> , <del>Ulva lactuca</del> , <i>Mazzaella splendens</i> ), Exotic kelp ( <i>Undaria pinnatifida</i> )	<u>Invertebrates:</u> Barnacles ( <i>Balanus glandula</i> and <i>Chthamalus</i> sp.), tunicates ( <i>Styela clava</i> , <i>Ciona</i> sp., <i>Botrylloides</i> spp., and others), <u>sponges</u> , <u>oysters</u> ( <i>Ostrea lurida</i> ), <u>Soft bryozoan</u> ( <i>Zoobotryon verticillatum</i> ), <u>Encrusting bryozoans</u> ( <i>Eurystomella</i> sp.), <u>Hydroids</u>  <u>Fishes:</u> Giant kelpfish, Kelp bass ( <i>Paralabrax clathratus</i> ), Barred sand bass, Topsmelt ( <i>Atherinops affinis</i> )
Riprap	<del>Barnacles</del> , <del>limpets</del> , and <del>Green alga</del> ( <i>Ulva intestinalis</i> [formerly <i>Enteromorpha intestinalis</i> ]), Exotic alga ( <i>Sargassum muticum</i> )	<u>Invertebrates:</u> Barnacles, limpets, Spiny lobsters  <u>Fishes:</u> None observed

Open Water	No plants <u>or</u> algae were observed during survey	<u>Invertebrates: None observed</u>  <u>Fishes: Topsmelt</u>  <u>Birds: <del>d</del> Double-crested cormorants (Phalacrocorax auritus), western grebes (Aechmophorus occidentalis)</u>
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Source: Appendix C

### ***Animal Species with the Potential to Occur within the Project Site***

The potential for sensitive species to occur within the Project ~~Site~~ site was evaluated in the Project's marine biological assessment (Appendix C) with citations relative to their occurrence included in the sections below. Protected, rare, threatened, or endangered wildlife species that may occur within Harbor Island West Marina include eastern pacific green sea turtle (*Chelonia mydas*) (Federal Threatened), California least tern (*Sternula antillarum browni*) (State Endangered and Federal Endangered), California brown pelican (Fish and Game Code section 3511(b)(2) Fully Protected), and nesting birds. Mammals protected under the Marine Mammal Protection Act and likely to occur within the marina include the harbor seal (*Phoca vitulina*) and California sea lion (*Zalophus californianus californianus*). None of the above species were observed during the survey, though their likelihood of occurrence is as follows.

#### ***Reptile Species***

*Eastern pacific green sea turtle.* The eastern pacific green sea turtle is federally threatened throughout its eastern North Pacific range and have been sighted from Baja California to southern Alaska, but most commonly occur from San Diego south. South San Diego Bay supports a population of eastern pacific green sea turtles (*Chelonia mydas*) that primarily remain in the warm waters of south San Diego Bay, though some are believed to leave the bay to nest on the beaches of offshore islands of Mexico. Tracking studies conducted by San Diego State University and National Marine Fisheries Service (NMFS) indicate that the turtles predominantly continue to only utilize South San Diego Bay. There is a potential for green sea turtles to transit past the Project site, although they have not been observed in the North Bay in recent years.

#### ***Bird Species***

*California least tern.* During its breeding season, April 1 through September 15, the endangered California least tern is observed in San Diego Bay. The California least tern was previously observed nesting at various locations around San Diego Bay, including SDIA, North Island Naval Station, the Naval Amphibious Base Delta Beach, D Street Fill, the Chula Vista Wildlife Reserve, and the South Bay Saltworks in the South San Diego Bay Unit of the San Diego National Wildlife Refuge (USFWS 2006). The HIWM is located approximately 1.5 miles from each of the two nesting sites, as identified above, in north San Diego Bay. The other observed nesting sites are located a greater distance from the HIWM. More recently, the California least tern was observed at Spanish Landing (across the water from the marina) during the 2016-2017 year-long, baywide avian surveys (Port of San Diego, 2018b). Given the occurrence at Spanish Landing and the ecological characteristics of the Project site, it is likely that the California least tern could forage within the marina during nesting season.

*California brown pelican.* The California brown pelican, identified as a Fully Protected Species under California Fish and Game Code, is commonly observed in the San Diego Bay and is found in small numbers along the shoreline of the bay. During the 2006 and 2009 baywide avian surveys, California brown pelicans were observed a total of 15 and 14 times, respectively (Appendix C). Moderate foraging habitat for the California brown pelican occurs within the waterside portion of the Project site. No large roosting aggregations occur in the Project site. Although temporarily increased turbidity associated with certain construction activities (e.g., during pile driving activities) could potentially reduce the forage efficacy of this species, the available open water habitat within the rest of San Diego Bay and in the nearshore coastal waters would provide ample alternative foraging opportunities. Noise associated with pile driving activities during construction could potentially disturb pelicans foraging immediately adjacent to the Project site; however, if disturbed, they would likely relocate to available loafing and foraging areas available outside

the Project site (Appendix C). This species has been delisted from its prior Federal and State endangered species status but remains protected as noted above. Brown pelicans do not breed on the mainland California coast.

*Nesting Birds.* Vegetation (ornamental trees) on the landside portion of the Project site provides marginal suitable nesting habitat for avian species protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code.

#### *Mammal Species*

*Harbor seal (Phoca vitulina).* The harbor seal, protected under the Marine Mammal Protection Act (MMPA), is commonly observed in temperate coastal habitats and uses rocks, reefs, beach, and drifting glacial ice as haul out and pupping sites. On the exposed ocean side of the Point Loma Peninsula, harbor seals have established one of two mainland hauling and rookery sites in San Diego County. As a result, Pacific harbor seals and their pups have been documented in San Diego Bay, mostly at the northern end of the Bay nearest Ballast Point. The harbor seals use a portion of the docks in a restricted area adjacent to the Naval Base Point Loma Submarine docking station to haul out. In addition, harbor seals have been observed to haul out along the shore south of Ballast Point (NOAA 2017).

Harbor seals do not breed in San Diego Bay, but forage there year round (Appendix C). Harbor seals are occasionally observed hauled out on low lying docks or beaches in the northern portions of San Diego Bay (U.S. Navy 2015). Although harbor seals are likely to occur within and nearby the marina based on observations in north San Diego Bay, their potential for occurrence at the Project site is negligible as there are no suitable haul out sites.

*California sea lion (Zalophus californianus californianus).* The California sea lion, protected under the MMPA, resides in the Eastern North Pacific Ocean in shallow coastal and estuarine waters. Sandy beaches are preferred for haul out sites. In California, they haul out on marina docks as well as jetties and buoys. California sea lions do not breed in San Diego Bay, but forage there year round. They are abundant on the bait barges at Point Loma and the U.S. Navy facilities along Point Loma. California sea lions were the most commonly observed marine mammal identified during a recent large-scale monitoring effort in north San Diego Bay (NAVFAW SW 2018). Although California sea lions are found nearby, their potential for occurrence at Project site is minimal because they do not breed in San Diego Bay but do forage there. Sea lions were not observed during surveys and would be expected to only occasionally enter the marina (Appendix C). Their potential to breed within the marina is negligible given that they do not breed in San Diego Bay (Bartholomew 1967). There have been recent observations of pupping in the large congregations of animals at the bait barges at Point Loma (Mooney 2019). There have been no similar observations elsewhere in San Diego Bay and so the likelihood of pupping within the marina is negligible.

#### *Fish Species*

There are 101 marine species managed under both the Pacific Groundfish and Coastal Pelagic Fishery Management Plans (FMPs). Five species out of the 101 species are managed under the Coastal Pelagic FMP, including northern anchovy, Pacific sardine, Pacific mackerel, market squid, and jack mackerel. Of these 5 species, both northern anchovy and Pacific sardine were caught during the 2016 fisheries inventories of San Diego Bay (Williams et al. 2016). The remaining 96 fish species identified are managed under the Pacific Groundfish FMP, and include California scorpionfish and olive rockfish, both of which were caught during the 2016 fisheries inventories of San Diego Bay (Williams et al. 2016). The Coastal pelagic species that both occur, and have the potential to occur in San Diego Bay are generally open water schooling species that would only occasionally be found in a marina environment in San Diego Bay. Fish species managed under the Pacific Coast Groundfish FMP occur in low numbers in San Diego Bay, and are not likely to be common within the Project site.

The Project site contains designated Essential Fish Habitat (EFH) for 100 fish species and a single species of marine invertebrate (market squid) (PFMC 2019, 2016). Of these 100 fish species, 57 have a high potential to occur within the Project site based on habitat requirements (McCain 2003, Appendix C, and PFMC 2005). Four of these 57 species were caught during recent fisheries inventories of San Diego Bay (Williams et al. 2016).

### ***Plant Species with the Potential to Occur within the Project Site***

Habitat within the landside portion of the Project site is identified as Urban/Developed. This type of land cover consists of paved areas and developed areas. Vegetation within this type of land cover is limited to ornamental landscaping; therefore, no sensitive plant species are present. The ornamental landscaping could provide marginal suitable nesting habitat for avian species protected under the MBTA) and the California Fish and Game Code (as discussed above).

Eelgrass, which is categorized as EFH and given further designation as a Habitat of Particular Concern, was identified within the Project site; however, impacts related to eelgrass are discussed in Threshold 2 below because it is considered a sensitive natural community.

### **Analysis of Environmental Impacts**

- a. Would the project 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 Game or U.S. Fish and Wildlife Service?***

**Less than Significant with Mitigation Incorporated.**

### **Construction – Waterside Improvements**

The proposed Project would require in-water construction work associated with the demolition and reconstruction of the proposed dock system and slips. Phase 1 construction is anticipated to take approximately 12 months. The in-water construction work would require the use of a crane barge, work boats, and an impact pile driver to install the dock system. The use of these types of equipment would generate noise, vibration, and turbidity in the immediate construction work area. Species, and the marine habitats on which they rely, that may be directly or indirectly affected by noise levels and/or turbidity produced during waterside Project construction include eastern pacific green sea turtle, bird species such as California least tern, marine mammals, designated EFH for coastal pelagic and pacific coast groundfish species, and designated estuary and seagrass habitat areas of particular concern (HAPC).

### ***Noise-related Impacts***

The proposed Project would use jetting followed by impact pile driving to install all of the concrete piles. An impact hammer would be used after jetting the piles in place to set the last 5 to 10 feet of the installed piles to the desired pile depth. Jetting piles as opposed to using vibratory techniques (i.e., pile driving) results in lower sound pressures (Illinworth and Rodkin 2007) and is a more environmentally sensitive method. Additionally, pile driving would be a temporary disturbance and the overall noise from impact pile driving would be minimal because of the low number of strikes needed to set each pile (e.g., the last 5 to 10 feet).

A hydroacoustic impact analysis was conducted as part of the Harbor Island West Marina Marine Biological Resources Report (Appendix C) to identify portions of the proposed Project that could have substantially adverse effects, direct or indirect, on marine species identified as candidates, sensitive, or actively maintain protected species status by the NMFS and CDFW. Thresholds for significant effects on marine mammals are described as Level A and Level B Harassment per the Marine Mammal Protection Act. According to the NMFS, extreme sound levels can cause harassment to marine mammals and other wildlife species (e.g., fish and sea turtles).

### ***Marine Mammals and Green Sea Turtle***

The sound level thresholds for Level A Harassment for marine mammals was updated in July 2016 and provides different thresholds based on auditory ranges of different types of marine mammals. Thresholds for Level A and Level B Harassment are provided in Table 12 and Table 13, respectively.

**Table 12. Level A Harassment Thresholds**

Hearing Group	Low Frequency Cetaceans <sup>1</sup>	Mid Frequency Cetaceans <sup>2</sup>	High Frequency Cetaceans	Phocid Pinnipeds <sup>3</sup>	Otariid Pinnipeds <sup>2</sup>
$L_E$ Threshold <sup>4</sup>	183 dB	185 dB	155 dB	185 dB	203 dB
PTS <sup>5</sup> Isopleth to $L_E$ Threshold	3.3 meters	0.1 meters	3.9 meters	1.8 meters	0.1 meters
$L_{PK}$ Threshold <sup>6</sup>	219 dB	230 dB	202 dB	218 dB	232 dB
PTS Isopleth to $L_{PK}$ Threshold	0.0 meters	0.0 meters	0.0 meters	0.0 meters	0.0 meters

Source: Appendix C

Note: Level A Harassment is defined as any act of pursuit, torment, or annoyance, which has the potential to injure a marine mammal or marine mammal stock in the wild.

<sup>1</sup> Cetacea include whales, dolphins, and porpoises

<sup>2</sup> Based on an assumption of 10 strikes per pile for 18-inch concrete piles, the mid-frequency cetaceans and otariid pinniped isopleths are 0.1 meter from source.

<sup>3</sup> Pinnipeds include seals, sea lions, and walruses

<sup>4</sup>  $L_E$  = 24-hour accumulation period

<sup>5</sup> PTS = permanent threshold shift

<sup>6</sup>  $L_{PK}$  = peak sound level

Isopleth = A line drawn on a map showing the occurrence of frequency of a phenomenon.

dB = decibels

**Table 13. Level B Harassment Thresholds**

Pile Size/Type	Driving Method	Level B Influence Isopleth Distances <sup>1</sup>
16" Concrete	Impact	74 meters
18" Concrete	Impact	25 meters

Source: Appendix C

Note: Level B Harassment is defined as having the potential to disturb a marine mammal or marine mammal stock in the wild by causing disruption of behavioral patterns, including, but not limited to, migration, breathing, nursing, breeding, feeding, or sheltering but which does not have the potential to injure a marine mammal or marine mammal stock in the wild.

Isopleth = A line drawn on a map showing the occurrence of frequency of a phenomenon.

<sup>1</sup> 160 dB<sub>rms</sub> used as threshold for Level B harassment

Anticipated peak sound levels ( $L_{PK}$ ) for in water construction of the Project are estimated to generate up to 185 dB (i.e., with use of an impact hammer to drive 18-inch piles)). This is below Level A Harassment thresholds established by NOAA for low-frequency cetaceans (219 dB), mid-frequency cetaceans (230 dB), high frequency cetaceans (202 dB), phocid pinnipeds (218 dB), and otariid pinnipeds (232 dB).

In addition to peak sound thresholds, recent NOAA guidance regarding Level A Harassment of marine mammals includes thresholds for 24-hour accumulation noise levels ( $L_E$ ) (Appendix C). The Project's worst case calculated  $L_E$  at source is predicted to be above the threshold for all marine mammals (Appendix C). However, the accumulated noise levels are so low that they quickly attenuate (i.e., over a short distance) to the NOAA defined thresholds. This means that marine mammals can be very close to pile driving yet are not predicted to be subject to Level A Harassment. Based on an assumption of 12 strikes per pile for 18-inch concrete piles, the mid-frequency cetaceans and otariid pinniped isopleths (distance from pile driving where injury may occur) are 0.1 meter (0.33 feet) from source. Phocid pinnipeds are 1.8 meters (5.9 feet) from source. The isopleths for low-frequency cetaceans and high-frequency cetaceans are 3.3 meters (10.8 feet) and 3.9 meters (12.8 feet) from source, respectively. Given such narrow isopleths within which noise levels can exceed thresholds for cumulative exposure, the potential for noise level impacts, as measured by  $L_E$ , is less than significant. This is because animals would have to remain within the isopleths distances for an entire day of pile driving to be subject to Level A Harassment. This scenario is highly unlikely as animals would essentially have to follow the pile driving from one pile to the next, and assumes that construction activities would not cause animals to temporarily leave the area.



The recent NOAA guidance for noise level impacts on marine mammals addresses only Level A Harassment (Appendix C). A determination of Level B Harassment (behavioral) relies on previous guidance established by NOAA. Level B Harassment could occur if marine mammals are exposed to in-water sound levels greater than 160 dB root mean square (RMS). The Project's proposed impact driving of 18-inch concrete piles is anticipated to produce noise levels of 166 dB RMS. The isopleth where sound is attenuated from 166 dB RMS to 160 dB RMS is 25 meters (82.0 feet), based on the practical spreading loss model. However, there is data showing higher noise levels for driving of smaller (16-inch) piles (e.g., 173 dB RMS at source). The isopleth to attenuate sound from 173 dB RMS to 160 dB RMS is 74 meters (242.8 feet). Level B Harassment (behavioral) could occur if marine mammals move inside the 160 dB RMS isopleths (contour line). While NOAA does not provide specific noise level guidance relative to green sea turtles, NMFS guidelines for marine mammals are currently accepted as also being protective of green sea turtles. Therefore, without mitigation, significant impacts to marine mammals and green sea turtles could occur as a result of Project construction.

An isopleth of 74 meters (242.7 feet) would be sufficient to monitor marine mammals and green sea turtles during construction. This isopleth is the maximum calculated for any of the potential noise related impact zones for wildlife species and therefore is a conservative distance for all noise related monitoring either "in air" or "in water". In air, sound attenuates faster than in water and sound levels are generally lower in air. Therefore, monitoring marine mammals and green sea turtles within 74 meters of source in air or in water is sufficient. The results of noise analyses relative to fish used the same worst-case scenarios and assumptions as those used for marine mammals.

Noise levels produced during proposed waterside construction activities have the potential to cause behavioral modification (Level B Harassment) to marine mammals and green sea turtles. However, these impacts would be mitigated to below a level of significance by **MM-BIO-1**, which requires implementation of a biological monitoring program, and **MM-BIO-2**, which requires use of soft-start techniques.<sup>5</sup> This technique provides a warning and/or gives marine mammals and sea turtles a chance to leave the area prior to any impact hammering. This methodology is recommended by the Joint Nature Conservation Committee (2004) and has been implemented as a common requirement within Incidental Harassment Authorizations for marine mammals issued by NOAA (e.g., NOAA 2017, NOAA 2016) although the efficacy of the method requires further research (David 2006). In the rare instance that marine mammals and turtles are present in the HIWM during in water construction activities, adherence to **MM-BIO-1** and **MM-BIO-2** would reduce construction noise impacts to marine mammals and the green sea turtle to a less than significant level.

**MM BIO-1: Monitoring Program.** Prior to construction activities involving in-water pile driving, the project proponent shall prepare and implement a marine mammal and green sea turtle monitoring program. This monitoring program shall be approved by the District and shall include the following requirements:

- For a period of 15 minutes prior to the start of in-water construction, a qualified biologist, retained by the project proponent and approved by the District's Director of Development or designee of the District, shall continuously monitor a 74-meter radius (zone of influence) around the active pile driving areas to ensure that special status species are not present.
- The construction contractor shall not start work if any observations of special status species are made prior to starting pile driving. No driving will be conducted until the area has been free of marine mammal sightings for 15 minutes.

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<sup>5</sup> Pile driving activities may begin with a "ramp-up" or "soft start" where lower hammer energy levels are used to start the pile driving process with the force of the pile driving gradually increased

- The qualified biologist shall continually ~~continuously~~ monitor the zone of influence (ZOI - 74 meters from pile driving activity) during pile driving activities to observe any marine mammals or turtles that approach or enter the ZOI. The qualified biologist shall have authority to stop all work on-site and shall do so if a marine mammal or sea turtle enters the ZOI or could otherwise be impacted by construction noise.
- The qualified biologist must meet the minimum requirements as defined by the National Oceanic Atmospheric Administration's *Guidance for Developing a Marine Mammal Monitoring Plan* (NOAA 2017).

**MM-BIO-2: Soft Start Methodology for Impact Hammer Pile Driving.** The contractor shall initiate all impact hammer pile driving techniques with a soft start methodology using an initial three sets of three low energy pile strikes. Low energy strikes are performed by running the impact hammer at reduced energy (typically 50–75 percent of full impact force) followed by a 30-second waiting period to initiate impact driving before ramping up to full hammer energy. The soft-start methodology shall be utilized any time pile driving has ceased for a period in excess of 30 minutes, provided compliance with MM BIO-1 confirms pile driving activities may commence.

#### *Fish*

Applying the NOAA thresholds for physical injury and behavioral modification for fishes allowed calculation of isopleths (distances from pile driving activities) within which injury or behavioral modification may occur. Physical injury is expected to occur to all fish if  $L_{PK}$  levels exceed 206 dB.  $L_E$  sound levels can injure fish above 187 dB and 183 dB for fish  $\geq 2$  grams and  $< 2$  grams, respectively. Behavioral modification occurs at 150 dB RMS. Peak sound levels are not anticipated to result in physical injury to fishes given that anticipated  $L_{PK}$  sound levels are lower (185 dB) than the threshold for injury.  $L_E$  levels are also expected to be too low based on 12 strikes per pile and 10 piles per day to cause physical injury to fishes;  $L_E$  is expected to be 155 dB. RMS levels for behavioral modification of fish based on the worst-case scenario (166 dB RMS) are above the 150 dB RMS threshold established by NOAA. Calculation of the behavioral modification isopleth using the practical spreading loss model requires a 117 meter (383.8 feet) isopleth to reduce RMS levels from 166 to 150 dB. Thus, a significant behavioral modification impact may occur for all fish occurring within 117 meters (383.8 feet) of pile driving.

Based on sound energy levels calculated and thresholds established by NMFS, it was determined that Level B (behavioral disruptions) harassment would occur to fish as a result of pile driving activities. A full discussion of potential impacts on fish species associated with pile driving is included in Appendix C and is hereby incorporated by reference. As such, pile driving activities associated with the marina construction would generate a potentially significant noise impact on these species that could result in Level B harassment. **MM BIO-2** would reduce construction noise impacts on fish species to less than significant because the use of soft-start techniques during pile driving will allow fish to flee the work area.

With regard to potential impacts to EFH and the coastal pelagic and pacific coast groundfish species managed under the Coastal Pelagic and Pacific Coast Groundfish FMPs, the coastal pelagic species that both occur, and have the potential to occur in San Diego Bay, are generally open water schooling species that would only occasionally be found in a marina environment in San Diego Bay. Fish species managed under the Pacific Coast Groundfish FMP occur in low numbers in San Diego Bay and are not likely to be common within the Project site. More importantly, none of the proposed Project construction activities are expected to negatively alter the ecological roles and processes currently occurring within the Project site that are characteristic of designated EFH for coastal pelagic species and pacific coast groundfish. As such, potential impacts to the role(s) that waters and substrate within the Project site play for these species regarding habitat for spawning, breeding, feeding, or growth to maturity, are expected to be negligible.

#### *Birds*

Pile driving would temporarily increase noise in the surrounding area, which could create a disturbance for the California least tern and affect their foraging. However, any impacts would be short-term, localized, and would not have a substantial adverse effect on bird populations. Marine and migratory birds, including the

California least tern, frequently experience elevated noise and disturbance from boat launching and passing vessels on the bay, as well as the nearby airport and overall industrial setting of the area (Mooney 2019). Therefore, construction noise impacts to migratory birds would be less than significant.

### ***Turbidity-related Impacts***

Although the waterside portion of the Project site provides potential foraging habitat for the California least tern and California brown pelican due to the presence of prey fish, these species are much more likely to forage in unobstructed open water habitat in San Diego Bay or the Pacific Ocean instead of local harbors and marinas. Some studies suggest that increased turbidity resulting from in water construction work could potentially decrease foraging success of the California least terns, as a result of decreased visibility (Appendix C). Therefore, overall impacts resulting from visual impairment of foraging California least terns would be potentially significant. To ensure that turbidity in the Project site during construction is minimized, **MM-HWQ-1 through MM-HWQ-3** requires the use of silt curtains and specifies pile driving techniques to minimize and restrict the spread of any generated turbidity that would minimize any potential foraging impacts on protected bird species such as the California least tern and California brown pelican. Implementation of **MM-HWQ-1 through MM-HWQ-3** would minimize any potential foraging impacts on these species and therefore impacts would be less than significant.

Additional details on turbidity and other water quality impacts are provided in Section X, *Hydrology and Water Quality*.

### **Construction – Landside Improvements**

No special status species were observed on the landside portion of the Project site, which is developed with existing marina uses, including structures and a parking lot. Vegetation (ornamental trees) on the landside portion of the Project site provides marginal suitable nesting habitat for avian species protected under the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Native resident or migratory birds using ornamental vegetation in the vicinity of Project site are expected to be acclimated to human disturbance associated with ongoing commercial, recreational, and airport land uses. However, potential impacts on nesting birds may occur if construction activities that disrupt nesting activities occur during the nesting season (generally March through August). Although no nests were observed during surveys of the Project site, a nest could become established in or near the landside portion of the Project site before landside construction begins. Additionally, as previously discussed, California least tern were observed at Spanish Landing (across the water from the marina) during the 2016-2017 year-long baywide avian surveys. However, there are no suitable nesting (sandy substrate) areas onsite or nearby.

Initiation of construction for landside development and removal of any ornamental trees would occur outside of the peak nesting season for MBTA protected nesting birds (March 15–August 31). Phase I of construction is planned to begin in September 2020 and last 12 months. Phase II of construction is anticipated to start between September and February 2021, and would end in the summer of 2022. As such, potential impacts to nesting birds would be avoided and no nests (that contain eggs or young) would be disturbed by construction. In the event that construction activities cannot be avoided during the nesting season for birds, **MM-BIO-3** shall be implemented. Implementation of **MM-BIO-3** would reduce impacts to nesting avian species to a less than significant level.

#### **MM-BIO-3: Avoid Nesting Season for Birds or Conduct Pre-construction Nesting Surveys.**

To ensure compliance with the MBTA and similar provisions under Sections 3503 and 3503.5 of the California Fish and Game Code, the Project proponent shall conduct all vegetation removal (e.g., ornamental trees) during the non-breeding season between September 1 and March 14 or shall implement the following:

1. If landside construction activities are scheduled between March 15 and August 31, the Project proponent shall retain a qualified biologist who shall conduct a focused nesting bird survey within potential nesting habitat prior to the start of vegetation removal. The survey shall be submitted to the District's Environmental Conservation Department prior to the commencement of vegetation removal on the Project site.

2. The nesting bird survey area shall include the entire limits of disturbance plus a 500-foot buffer to ensure indirect impacts would be avoided. 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 biologist(s). The survey shall occur between sunrise and 12:00 p.m., when birds are most active. If no active nests are detected during these surveys, only a brief letter report documenting the results shall be prepared.
3. If the qualified biologist confirms nesting within 300 feet of the disturbance footprint, 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 a qualified biologist determines that the nest is no longer active. The size and constraints of the no-disturbance buffer shall be determined by the qualified biologist, but shall not be greater than 300 feet. If there is a delay of more than 7 days between when the nesting bird survey is performed and vegetation removal begins, the qualified biologist shall resurvey to confirm that no new nests have been established.

### **Operation – Waterside and Landside Improvements**

Operation of the proposed Project on both the waterside and the landside would not result in increased risks to wildlife because the redevelopment of HIWM would replace existing marina uses with similar marina uses. The redevelopment of the waterside portion of HIWM would result in an overall decrease (6,000,782 square feet) in over water coverage associated with the new dock system. The reduction in over water coverage would result in an increase of open water for foraging by the California least tern and other foraging birds in the area. The decrease in over water coverage also provides an improved condition for future eelgrass growth. In addition, the boat traffic and other operational uses of the waterside would not increase as a result of the proposed Project. Therefore, the marine mammals, Eastern Pacific green sea turtle, and fish would not be affected.

Proposed landside operations would also be consistent with existing operations as no increase is proposed. Therefore, the ability for birds to nest would not be affected. Therefore, operational impacts would be less than significant.

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

**Less than Significant with Mitigation Incorporated.**

### **Construction — Waterside Improvements**

#### ***Eelgrass***

As identified in the Harbor Island West Marina ~~Marine-Updated~~ Eelgrass Resources and Impact Report as revised on January 28, 2022 ~~Baseline Eelgrass Resources Report~~ (Appendix B1), the waterside of the Project site has eelgrass habitat present. Eelgrass is recognized as a habitat area of particular concern (HAPC) by NOAA Fisheries.

Eelgrass resources can be impacted both directly and indirectly by project design elements and construction activities. Indirect impacts can occur from increases in turbidity. Direct impacts to eelgrass can result from shading caused by new or increased docks and related structures, as well as shading from support vessels (e.g., barges), bottom scour from propeller wash from construction vessels and impacts to the bay sediment from construction barges including from the use of spuds and anchors.

Turbidity decreases the light available to the eelgrass beds as more light is attenuated through the water column than would be otherwise. Additionally, as particulates settle from the turbid water column they can land on eelgrass blades and reduce the ability of the plant to photosynthesize. The extent of turbidity related impacts is dependent upon the extent and duration of the elevated turbidity.

The planned waterside improvements would result in a reconfiguration of the dock layout. Based on a preliminary assessment prepared for the proposed Project, the reconfiguration of the dock layout would

result in the direct coverage of 4,543,177 square meters (48,900,190 square feet) of existing eelgrass beds (Figure 14 through Figure 16). This coverage represents a direct impact on existing eelgrass. This direct impact on eelgrass would be mitigated by implementation of **MM-BIO-4**. This measure requires, among other things, the development of an eelgrass mitigation and monitoring plan prior to project commencement for eelgrass transplantation.

Although the reconfiguration will have a direct impact on eelgrass, ~~it will result in the vessel docks will have~~ a reduced overall footprint of waterside improvements. Currently, marina facilities and docks cover and shade 13,564 square meters (146,000 square feet) of water area. After construction, this would be reduced to 12,934 square meters (139,218,440,000 square feet), which is a decrease of 630 square meters (6,782,000 square feet) in shaded water area. However, the operation of the marina will mean that the docks are occupied by vessels. Given the larger slip sizes proposed, there will be an overall increase in eelgrass shading due to the operational impacts.

The existing combined dock and slip area was calculated to be 41,244 square meters (443,947 square feet) in the 2022 Harbor Island West Marina Updated Eelgrass Resources and Impact Report (Appendix B1) that examined the spatial distribution of eelgrass relative to depths and shading within the marina assuming 100% slip occupation. The proposed combined dock and slip area would measure 47,366 square meters (509,843 square feet). This increase in total reduction of over water coverage was evaluated as part of an eelgrass impact assessment the 2022 Eelgrass Resources and Impact Report (Appendix B1). that examined the spatial distribution of eelgrass relative to depths and shading within the marina. That evaluation estimated that 4,543 square meters (48,900 square feet) of eelgrass would be directly impacted by shading from docks and occupied slips. 85 square meters (915 square feet) of additional eelgrass beds could be expected within the Project site following the removal of existing docks within the optimum growing range of eelgrass. Those findings are based on the fact that there are docks currently in areas with depths that are suitable to support eelgrass. The removal of these docks would create new potential for eelgrass to grow. However, to ensure rapid eelgrass colonization in the removed dock areas and to ensure that the Project does not result in a reduction of eelgrass, restoration of eelgrass is proposed. Transplantation Restoration of approximately 5,452,300 square meters (58,685,270 square feet) of eelgrass is necessary to mitigate at a ratio of 1:1.2 for direct impacts on eelgrass. adjacent to existing beds would ensure colonization of areas with removed shading in shallow water near existing eelgrass beds such that there is no reduction in eelgrass resources. Based on the currently known potential for direct impacts of 4,543 square meters (48,900 square feet), the California Eelgrass Mitigation Policy requires the successful establishment of 5,452 square meters (58,684 square feet) of eelgrass at the 1.2:1 mitigation ratio to mitigate for the permanent impacts on eelgrass associated with the new dock layout. The California Eelgrass Mitigation Policy recommends a conservative planning approach with a minimum transplant ratio of 1.38:1 to account for the fact that not all planting area will successfully support eelgrass. The recommended eelgrass transplant starting area at the 1.38:1 ratio is 6,269 square meters (67,478 square feet). This can be accommodated within the lease area where there is 30,410 square meters (327,330 square feet) of eelgrass planting area. In the event the site fails to support enough eelgrass cover to meet the mitigation requirements, supplemental planting and additional adaptive management strategies may be employed. MM-BIO-4 is required to mitigate potential temporal losses of eelgrass within the Project site.

Construction activities associated with the proposed Project could also result in temporary shading from support vessels (e.g., barges), bottom scour from propeller wash from construction vessels and impacts to the bay sediment from construction barges including from the use of spuds and anchors. Assessing





**Figure 14**  
**Baseline Eelgrass Diver Transects**  
**Harbor Island West Marina Redevelopment Project**



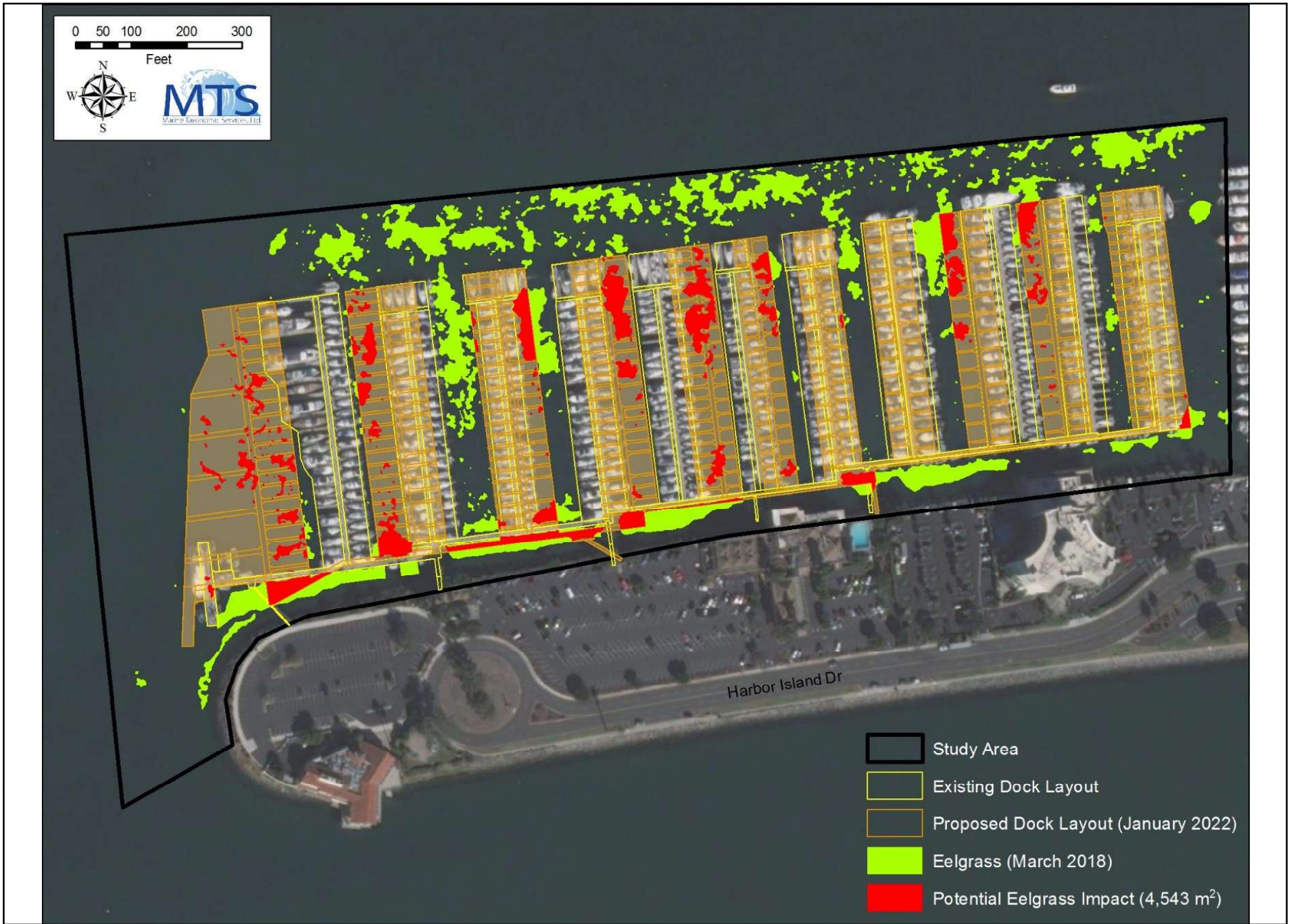




**Figure 15**  
**Eelgrass Distribution**  
**Harbor Island West Marina Redevelopment Project**







**Figure 16**  
**Potential Eelgrass Impacts**  
**Harbor Island West Marina Redevelopment Project**



effects to eelgrass habitat relies on performing eelgrass surveys prior to and following construction as required by NMFS *California Eelgrass Mitigation Policy and Implementing Guidelines* (NMFS 2014).<sup>6</sup> Pre-construction surveys provide a baseline condition for determining potential project-related impacts. Additionally, the pre-construction data can be used to train contractors relative to the presence of eelgrass resources prior to the start of construction. Post-construction eelgrass surveys provide a means to assess direct impacts immediately following construction or indirect impacts that take time to assess through repeated post-construction surveys. The requirement for pre- and post-construction eelgrass surveys, requirement/training of contractor to protect eelgrass from anchored barges, boat navigation, and propeller wash during construction, and guidelines for actions to be taken ~~in the event that~~ if unforeseen impacts to eelgrass occur is outlined in **MM-BIO-4**. **MM-BIO-4** also addresses potential temporal impacts on eelgrass associated with construction activities and/or ensure the amount of restored eelgrass is consistent with California Eelgrass Mitigation Policy mitigation ratio. This mitigation measure requires a plan to restore eelgrass in a suitable area and monitor restoration results.

In addition, construction activities within the waterside portion of the Project site will require authorization from the USACE under Section 10 of the Rivers and Harbors Act (RHA). Implementation of mitigation measures and eelgrass surveys would need to be performed to the satisfaction of USACE, NOAA Fisheries (also known as NMFS), and consistent with the October 2014 *California Eelgrass Mitigation Policy and Implementing Guidelines*. With the implementation of mitigation measures, impacts would be less than significant.

**MM-BIO-4 Develop and Implement an Eelgrass Mitigation and Monitoring Plan as Required by the California Eelgrass Mitigation Policy.** Prior to the start of any in-water construction, the Project proponent shall retain a qualified biologist to develop and implement an eelgrass mitigation plan in compliance with the California Eelgrass Mitigation Policy. The qualifications of the qualified biologist are subject to approval by the District's Environmental Conservation Department. The mitigation plan shall be submitted to the District's Environmental Conservation Department and resource agencies (NMFS and CDFW) for approval 60 days prior to initiation of waterside project activities. The mitigation plan shall be implemented to (1) develop new eelgrass habitat on the areas of the vessel dock area that will no longer be shaded and (2) compensate for losses to eelgrass in the event that the surveys described below indicate the project has impacts on eelgrass. The specific eelgrass mitigation plan elements shall, at a minimum, include the following:

- 1 Prior to the commencement of any in-water construction activities, a qualified marine biologist retained by the Project Applicant and approved by the District shall conduct a pre-construction eelgrass survey. Surveys for eelgrass shall be conducted during the active eelgrass growing season (March–October), and results will be valid for 60 days, unless completed in September or October. If completed in September or October, results will be valid until March (the resumption of the next growing season). The qualified marine biologist shall submit the results of the pre-construction survey to the District and resource agencies within 30 days.
- 2 Identification of areas within and potentially outside of the marina ~~Project areas within the vessel dock area that are no longer shaded and that~~ are considered favorable to restore a minimum of 5,452,300 square meters (58,685,700 square feet) of eelgrass habitat. In addition, the mitigation plan shall include:
  - a. Description of harvest and transplantation techniques to satisfy California Department of Fish and Wildlife requirements with regards to ensuring protection of beds used as a source of transplant material.

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<sup>6</sup> Available at [https://archive.fisheries.noaa.gov/wcr/publications/habitat/california\\_eelgrass\\_mitigation/Final%20CEMP%20October%202014/comp\\_oct\\_2014\\_final.pdf](https://archive.fisheries.noaa.gov/wcr/publications/habitat/california_eelgrass_mitigation/Final%20CEMP%20October%202014/comp_oct_2014_final.pdf).

- b. A schedule that ensures eelgrass is transplanted as soon as possible following reconfiguration of the eastern portion of the marina where suitable planting sites become un-shaded by dock structures.
- 3 The Project proponent, through its general contractor, shall:
  - a. Provide the pre-construction eelgrass surveys noted above identifying and demarcating the distribution of eelgrass to construction crews to assist tug and barge operators to avoid impacting eelgrass.
  - b. Require all tug and barge operators to locate all anchored and spudded construction barges outside of eelgrass beds when not in use.
  - c. Instruct tug boat operators that propeller wash can damage eelgrass beds and not to direct propeller wash toward eelgrass beds. No anchoring (and other bottom-disturbing activities) shall occur within eelgrass beds.
- 4 Within 30 days of completion of in-water construction activities, a qualified marine biologist retained by the Project Applicant and approved by the District shall conduct a post construction eelgrass survey during the active eelgrass growing season or within first 30 days of next active growth period following construction that occurs outside of active growth period. The post-construction survey shall evaluate potential eelgrass impacts associated with construction. Upon completion of the post-construction survey, the qualified marine biologist shall submit the survey report to the District and resource agencies within 30 days.
- 5 At least two years of annual post-construction eelgrass surveys shall be conducted during the active eelgrass growing season. The additional annual surveys shall evaluate the potential for operational impacts on eelgrass.
- 6 In the event that construction impacts on eelgrass are detected in the post-construction survey and/or subsequent surveys, the Project Applicant shall implement the following:
  - a. A qualified marine biologist retained by the Project Applicant and approved by the District shall develop a mitigation plan for in-kind mitigation. The qualified marine biologist shall submit the mitigation plan to the District and resource agencies within 60 days following the post-construction survey.
  - b. The eelgrass mitigation and monitoring plan shall specify that the contractor/entity harvesting eelgrass to implement the required mitigation would need to obtain a Scientific Collecting Permit (SCP) for eelgrass harvest and a letter of authorization (LOA) at least 30–60 days prior to implementation.
  - c. Mitigation for eelgrass impacts shall be at a ratio of no less than 1.2:1, as required by the California Eelgrass Mitigation Policy.
  - d. Mitigation shall commence within 135 days of any noted impacts on eelgrass, such that mitigation commences within the same eelgrass growing season that impacts occur.
  - e. Upon completing mitigation, the qualified biologist shall conduct mitigation performance monitoring at performance milestones of 0, 12, 24, 36, 48, and 60 months.
  - f. The qualified biologist shall conduct all mitigation monitoring during the active eelgrass growing season and shall avoid the low growth season (November–February). Performance standards shall be in accordance with those prescribed in the California Eelgrass Mitigation Policy.

- g. The qualified biologist shall submit the monitoring reports and spatial data to the District and resource agencies within 30 days after the completion of each monitoring period. The monitoring reports shall include all of the specific requirements identified in the California Eelgrass Mitigation Policy.

#### **Operation – Waterside Improvements**

Operation of the proposed Project would not result in increased boat traffic or other increased post-construction risks to sensitive natural communities identified by the CDFW or USFWS because the redevelopment of HIWM would replace existing marina uses with similar marina uses. Because the proposed project would increase reduce the total number of boat slips by three slips, there would be a negligible no increase in the number of boats accessing the marina that could impact sensitive communities such as eelgrass.

With regard to potential impacts to seagrass HAPC within the Project site, potential impacts are significant, as noted above. expected to range from negligible to beneficial. The completed Project would result in the reduction of overwater coverage due to the docks by 6,0006,782 square feet. However, although the increase in the number of slips is negligible, the slip area is significantly increased. This results in the impacts noted above on eelgrass beds once slips are occupied, and would pose a negligible impact to eelgrass beds already present with the implementation of best management practices that are protocol for such dock renovation/replacement projects. As such, the removal of shading and increase in eelgrass habitat is only expected to benefit/improve seagrass HAPCs already present within HIWM, with other potential impacts to seagrass HAPC being negligible, as other ecological roles and processes characteristic of the HAPC will not be altered by the proposed Project. Operational impacts would be significant but reduced to less than significant following mitigation.

#### **Construction and Operation – Landside Improvements**

The landside portion of the Project site consists entirely of developed land; there are no sensitive vegetation communities or areas of riparian habitat located within this portion of the Project site. No impacts associated with construction or operation of landside improvements would occur and no mitigation measures are required.

- c. ***Would the project 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?***

**Less Than Significant Impact.** No state protected wetlands, as defined by the State Water Resources Control Board, or federally protected wetlands, as identified under Sections 401 and 404 of the Clean Water Act, are located within or immediately adjacent to the Project site. The waterside Project site and surrounding bay is considered a water of the United States (Section 10 waters) and is a 303(d) impaired water body pursuant to the Clean Water Act. The proposed Project activities are regulated under Section 10 of the Rivers and Harbors Act of 1899, Section 401 of the Clean Water Act, and the Coastal Act. A Water Quality Certification from the San Diego Regional Water Quality Control Board (RWQCB), Section 404 permit and Section 10 permit from the U.S. Army Corps of Engineers, and a Coastal Development Permit (CDP) from the District are required for the proposed Project. Permanent best management practices (BMPs) would be required to ensure water runoff during project operations does not adversely impact the bay. (See Section X, *Hydrology and Water Quality*, for a complete discussion on the proposed Project's water quality requirements.) There are no federally or state protected wetlands on the Project site. There are no net fill impacts due to removal and replacement of marina pilings. Impacts would be less than significant.

- d. ***Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

**Less than Significant Impact.** The Project site is currently developed with landside and waterside improvements. Due to the existing developed nature of the landside portion of the project and the

surrounding urbanized area, native resident or migratory wildlife are not expected to occur. The waterside improvements do not propose any barriers or impediments that could interfere with the movement of native resident or migratory fish. Therefore, the project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species. Additionally, the project site and surrounding area is not located within a native resident or migratory wildlife corridor nor within the boundaries of a native wildlife nursery. Therefore, the project would not interfere with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant, and no mitigation measures would be required.

***e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact with Mitigation Incorporated.** Local biological resource policies and ordinances relevant to the proposed Project include the PMP and the California Eelgrass Mitigation Policy. The proposed Project would be consistent with the PMP conservation land use objective to encourage the protection and restoration of functional areas which have a high ecological value because the project is not within an area included in the conservation group scheduled for little or no development or an area of extraordinary biological significance. Additionally, biological impacts have been minimized (also refer to discussion in response XI.b). The proposed project is consistent with the California Eelgrass Mitigation Policy through implementation of **MM-BIO-4** (see discussion in response IV.b). There are no other local policies or ordinances that apply to the proposed Project, including a tree preservation policy or ordinance. Therefore, the proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts would be less than significant with implementation of the above identified mitigation measure.

***f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?***

**Less Than Significant Impact with Mitigation Incorporated.** The Project site is within the jurisdiction of the District. The District does not have an adopted Habitat Conservation Plan or other approved local, regional, or State habitat conservation plan. Although the Project site is within the City of San Diego Multiple Species Conservation Program (MSCP) boundaries, the District's jurisdiction is not included as part of the MSCP; thus, the proposed Project is not part of the Multi-Habitat Planning Area preserve system and would not conflict with the MSCP. However, the Project site is within an area (known as the Functional Planning Zone) in the San Diego Bay Integrated Natural Resource Management Plan (INRMP), which is a San Diego Bay Ecosystem Plan (SDBEP) (U.S. Navy and District 2013). The INRMP is a long-term strategy sponsored by two of the major managers of the San Diego Bay – the U.S. Navy and the District. The most recent version of the INRMP was approved in September 2013. The intent of the INRMP is to provide direction for the good stewardship that natural resources require, while also supporting the ability of the Navy and the District to meet their missions and continue functioning within the bay. The stated goal of the INRMP is to ensure the long-term health, recovery, and protection of San Diego Bay's ecosystem in concert with the bay's economic, Naval, recreational, navigational, and fishery needs.

Project construction activities such as pile driving and jetting are addressed in Section 5.2.3 of the INRMP. In particular, the INRMP provides that project construction should seek to avoid, minimize, or mitigate impacts from activities that result in turbidity, vibration and noise. The proposed Project would be conducted in a manner that is compatible with all of these objectives, as further detailed below.

Project activities would be compliant with INRMP and water quality monitoring and silt curtains would be in place during activities that generate turbidity (see **MM-HWQ-1** through **MM-HWQ-3**). In addition, all pile installation activities shall be conducted in a manner that reduces noise to the greatest extent feasible, including soft starting and maximized jetting to minimize the need for pile driving and its resultant noise and vibration effects (see **MM-BIO-2**). Overall, it is anticipated that the proposed Project would improve habitat quality by reducing the area of shaded water surface from 146,000 to 139,218 ~~440,000~~ square feet, thus creating an opportunity for eelgrass colonization. The proposed Project does not conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local,



regional, or state habitat conservation plan, as none exist that covers the Project site or surrounding area. The proposed Project is consistent with the goals and objectives of the INRMP. Implementation of the identified mitigation measures would reduce impacts to less than significant.

## V. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

A review of the U.S. Geological Survey (USGS) Point Loma 7.5-minute quadrangle map shows that prior to the early 1960s the Project site consisted of open waters of the San Diego Bay (USGS 1953). Beginning in the early 1960s, Harbor Island was created out of material dredged to deepen the channel between the outer San Diego Bay and the aircraft carrier docks at North Island (Appendix E). The HIWM was originally constructed between 1970 and 1972.

On December 9, 2014, the South Coastal Information Center (SCIC) of the California Historical Resources Information System at San Diego State University conducted a cultural resources record search of the Project site. The record search area, which included a quarter-mile buffer zone around the Project site, included all relevant site records on file with the South Coastal Information Center, the National Register of Historic Places, the California Register of Historical Resources, and the City of San Diego Historical Resources Register. No prehistoric or historic sites were identified within the Project site or adjacent to the Project site.

### Analysis of Environmental Impacts

#### ***a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

**Less Than Significant Impact.** Under CEQA, historical resources include intact buildings or structures listed in or eligible for listing in the California Register of Historical Resources (CRHR), locally designated by a municipality, or included in a local survey that meets the requirements of PRC 5024.1(g). California Historic Landmarks (CHLs) No. 770 and all consecutively numbered CHLs following CHL No. 770 also qualify as historical resources. The Project site contains no buildings, structures, or other resources previously listed in or determined eligible for listing in the CRHR, no locally designated resources, no resources included in a survey that meets the requirements PRC 5024.1(g), and no CHLs. Fifty (50) years is the age threshold at which a built resource should be considered a potential historical resource under CEQA and evaluated for CRHR eligibility if subject to potential impacts from a project requiring CEQA compliance. Some exceptional built resources can achieve significance justifying CRHR listing prior to reaching the 50-year threshold, when the existing historical record clearly indicates their significance. No such built resources are present at the Project site. Construction on Harbor Island began in the early 1960s. The HIWM and associated vessel fueling facility and other buildings, as well as other adjacent to the Project site, were built between 1970 and 1972 (USGS 1970, NETR 1972). These buildings do not meet the age threshold requiring evaluation for listing in the California Register of Historical Resources. Therefore, less than significant impacts on historical resources would occur from construction and operation of the proposed Project and no mitigation measures are required.

***b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

**Less Than Significant Impact.** A record search performed at the South Coastal Information Center on December 9, 2014, indicated that no archaeological resources have been identified in the Project area. A review of historic maps shows that the Project site is situated on an artificial landform area created by bay infill and is within a highly developed environment that has been severely disturbed by development; thus, the potential for any buried resources to exist on the Project site is low. Therefore, the sensitivity of the Project site for archaeological resources is low. In addition, there is a low likelihood of underwater resources at the Project site. The in-water construction would occur within a highly active recreational boating area that has operated as an active boat marina since 1972 and has been subject to ongoing maintenance. There is no evidence based on current and past activities that there are shipwrecks or other underwater archaeological resources at or near the HIWM (California State Lands Commission 2015). Therefore, construction and operation of the proposed Project would not result in a significant adverse change in the significance of an archaeological resource. Impacts would be less than significant and no mitigation measures would be required.

***c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?***

**Less Than Significant Impact.** The Project site is a part of Harbor Island which is a manmade island constructed during the early 1960s using dredged material from San Diego Bay. In addition, the Project site was developed between 1970 and 1972, which included soil disturbance to pave the site for surface parking, install utilities (including an underground storage tank), and install the foundations for the existing structures now on-site. No evidence in the historical record indicates that the Project site has been used for human burials and there is a very low potential for human remains to be located within the Project site.

The California Health and Safety Code (HSC) (Section 7050.5) states that if human remains are discovered on site, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98, including coordination with the Native American Heritage Commission (NAHC), which will identify the “most likely descendant” (MLD) should the remains be identified as being of Native American origin. As further stated in Section 7050.5, “... with the permission of the owner of the land or his/her authorized representative, the descendant may inspect the site of the discovery. The descendant shall complete the inspection within 24 hours of notification of the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.” As adherence to above-identified State regulation is required for all development, including the proposed Project, no mitigation is required in the unlikely event human remains are discovered on site. Adherence to applicable HSC and PRC requirements is standard for all projects; therefore, impacts associated with this issue would be less than significant and no mitigation measures are required.

## VI. Energy

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

**Less than Significant Impact.** Project construction would primarily consume diesel fuel through operation of construction and demolition equipment, work boat, barge, and truck trips for debris hauling and construction material delivery; gasoline associated with worker commutes; and minor amounts of electricity associated with operation of electrically powered construction equipment. Construction-related energy use would represent a small demand on local and regional fuel and electricity supplies that could be easily accommodated by fuel suppliers. This demand for fuel and electricity would have no noticeable effect on peak or baseline demands for energy.

Project operation of the replaced landside buildings would reduce energy demands from current usage as all light fixtures would be replaced with LED lights, low-flow fixtures and appliances would be used and all new appliances would be Energy-Star qualified and irrigation of new drought-tolerant landscaped areas would be efficient. The proposed Project would result in a 30 percent decrease in energy demand compared with existing conditions (Appendix A). Therefore, impacts are less than significant since construction or operation of the project would not result in wasteful, inefficient or unnecessary consumption of energy resources.

**b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

**No Impact.** The applicable renewable energy standards for the proposed Project include the Advanced Clean Cars Program, California Title 24 energy efficiency standards, EO B-16-12, SB 350, and SB 100. Each of these contain required standards related to energy efficiency and renewable energy development.

The proposed Project is therefore obligated to comply with these plans and regulations, and will benefit from the resulting increases in energy efficiency and renewable energy development. Vehicles are expected to become increasingly more efficient as a result of the regulations included in the Advanced Clean Cars Program and EO B-16-12, which address average fuel economy and commercialization of zero-emission vehicles, respectively. Building energy efficiency is also expected to increase as a result of (1) compliance with Title 24 Building Codes, which are expected to move toward zero net energy for newly constructed buildings, and, (2) under SB 350 and SB 100 regulations, the shift toward 100 percent of retail sales of electricity to California end-users and electricity procured to serve state agencies to be provided by zero-carbon resources. Local plans that address energy efficiency include San Diego Gas & Electric (SDG&E) energy procurement plans, SANDAG's Regional Energy Strategy (RES), as well as various Port plans and regulations, including the Climate Action Plan (CAP).

SANDAG's RES established long-term goals related to energy efficiency, renewable energy, distributed generation, transportation fuel, among others. The strategies and goals found in the RES were used as guidance for development of the energy components of the 2050 Regional Transportation Plan

(RTP)/Sustainable Communities Strategy (SCS). The proposed Project would not result in any long-term changes to population. As a result, the proposed Project would not result in any changes to demographic forecasts. Therefore, the proposed Project is consistent with the demographic projections included in the 2050 RTP/SCS, and the applied RES goals and guidance accurately portray energy solutions to accommodate future growth. Therefore, the proposed project is consistent with the 2050 RTP/SCS and the technical strategies to address energy efficiency from SANDAG's RES. Furthermore, the proposed Project would improve an existing facility with efficient lighting, low flow fixtures and appliances, Energy-Star appliances, and drought-tolerant landscaping that would require less irrigation. These improvements would reduce energy demand at the Project site compared to existing conditions, and would not conflict with the electricity provider's ability to provide renewable energy sources. Therefore, the proposed Project would not interfere with the implementation of the standards related to energy efficiency and renewable energy development, and there would be no impact.

## VII. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic groundshaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?*	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

\*Geology and Soils question (d) reflects the current 2019 California Building Code (CBC), effective January 1, 2020, which is based on the International Building Code (2009).

### Environmental Setting

The geology and soils environmental setting is summarized from the *Geotechnical Investigation Landside Improvements, Harbor Island West Marina* (TerraCosta 2015, Appendix D), the *Guide Pile and Approach Pier/Gangway Foundation Design Criteria, Harbor Island West* (TerraCosta 2012, Appendix E). These documents, along with other information, are incorporated in this section. The Project site is located in the San Diego Bay at the western edge of the terraced coastal plain, which bounds the Peninsular Ranges province of California. More specifically, the Project site lies within an area of reclaimed estuarine and low-lying tidelands located south and east of Loma Portal at the northern end of San Diego Bay.

Prior to the early 1900s, the San Diego River periodically overflowed its banks and reestablished a new course southerly into San Diego Bay. In the early 1900s, the USACE created a levee system to prevent flooding and to direct the San Diego River to the west into Mission Bay. Over the next decades, the low-



lying lands in the general San Diego Bay area were developed into what is currently the SDIA, Harbor Island, Shelter Island, and a few remaining tidelands. In 1961, the Harbor Department of San Diego began a major dredging operation of the bay, and dredged material from this operation was used to create Harbor Island. Most of the fill material are of hydraulic origin and generally consist of relatively clean sands placed over granular bay deposits.

For landside subsurface conditions, over the entire Harbor Island, previous studies show an average subsurface soil profile of fill soils that extended from surface grades down to an elevation of -9 feet, bay deposits that extended to an elevation of -19 feet MLLW, and the Bay Point Formation that extended to the depths explored. Subsurface conditions encountered by onshore borings at the Project site showed both mechanically and hydraulically placed fill soils underlain by bay deposits. Bay deposits were underlain by the Bay Point Formation. The contact between fill and bay deposits ranged from -7 to -20 feet MLLW, and the contact between the bay deposits and the Bay Point Formation ranged between elevations -13.5 feet and -27.5 feet MLLW.

For waterside subsurface conditions, the subsurface soil conditions encountered by offshore borings and vane shear tests typically showed 6 to 12 inches of near-surface, fine-grained, colloidal flock exhibiting essentially no shear strength. The bay-floor colloidal flock is underlain by variable thickness (typically 1 to 2 feet thick) bay deposits consisting of very loose to medium dense fine sands, and locally very soft to soft silts and clays. Weathered Bay Point formational terrace deposits were generally encountered below elevation -13 feet MLLW and the less weathered (more competent) Bay Point Formation below -20 feet MLLW.

There are no active faults or Alquist-Priolo (AP) Earthquake Fault Zones on the Project site (City of San Diego 2008). The Spanish Bight segment of the Rose Canyon fault zone, approximately 1.2 miles to the east, is the closest active fault to the Project site (DOC 2015).

#### **Analysis of Environmental Impacts**

- a. Would the project 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 Division of Mines and Geology Special Publication 42.***

**Less Than Significant Impact.** In 1972, the AP Earthquake Fault Zoning Act was passed by the California Legislature. The primary purpose of the AP Earthquake Fault Zoning Act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The act addresses only the hazard of surface fault rupture and is not directed toward other earthquake hazards. The law requires the state geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist-Priolo Zones) around the surface traces of active faults and issue locational maps to all affected cities, counties, and state agencies for their use in safe construction. Before a project may be permitted, a geologic investigation is required to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (generally 50 feet).

The City of San Diego Safety Study, Geologic Hazards and Faults, Sheet 16, does not identify the Project site as being within Hazard Category 11 (Active, Alquist-Priolo Earthquake Fault Zone) (City of San Diego 2008). The nearest AP Zone to the Project site is located approximately 1.2 miles east of the Project site and is associated with the Spanish Bight segment of the Rose Canyon fault (DOC 2015). Ground rupture due to faulting is not a hazard for the proposed Project because no active faults or AP Zones traverse the site. Therefore, it is not anticipated that people or structures would be exposed to substantial adverse effects from a rupture of a known earthquake fault. A less than significant impact would occur.

*ii) Strong seismic groundshaking?*

**Less Than Significant Impact with Mitigation Incorporated.** As with most southern California regions, the Project site's landside and waterside features would be subject to strong ground shaking in the event of a major earthquake. There are many active fault zones throughout the Southern California region, but the two closest fault zones that are most likely to result in a seismic event that would cause ground shaking include the Rose Canyon fault zone and the Coronado Banks fault zone. The Rose Canyon fault zone is located approximately 1.2 mile east of the site, and the Coronado Banks fault is approximately 11.9 miles west of the site. Additionally, the Harbor Island area is located in Seismic Zone 4, which is a designation previously used in the Uniform Building Code (UBC) to denote the areas of the highest risk to earthquake ground motion (California Seismic Safety Commission 2005).

The proposed Project would involve the redevelopment of the existing marina, including both waterside and landside infrastructure. Both the waterside and landside improvements would involve removing existing structures (e.g., docks, piles) and buildings, upgrading their existing foundations, installing concrete piles for the new dock system reconfiguration, and construction of new buildings. As noted above, the San Diego region is subject to earthquakes, which can result in strong seismic ground-shaking. As such, the project site could be exposed to strong seismic ground-shaking in the future. Construction of the proposed Project would be subject to the most recent California Building Code (California Code of Regulations [CCR] Title 24) as well as the recommendations contained in the Project-specific geotechnical studies, which would help ensure the structural and foundational integrity of the buildings. Compliance with the recommendations of Section 7 of the Geotechnical Study (Appendix D) would be required as part of implementation of the proposed Project (**MM-GEO-1**) to ensure seismic ground shaking does not impact the Project. The Geotechnical Study and its recommendations will be reviewed by the City of San Diego during the building permit process to determine conformity with City and State standards, which are designed to reduce potential impacts resulting from seismic conditions.<sup>7</sup> Through compliance with the California Building Code (Title 24) and implementation of **MM-GEO-1**, the Project's impact associated with strong seismic ground shaking would be less than significant.

**MM-GEO-1: Compliance with Recommendations of the Geotechnical Studies.** Implementation of the proposed Project would comply with the recommendations of the geotechnical studies (Appendix D and Appendix E) to ensure seismic ground-shaking does not impact the proposed Project.

*iii) Seismic-related ground failure, including liquefaction?*

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

Soils susceptible to liquefaction generally consist of loose to medium dense sands and nonplastic silt deposits below the groundwater table. The soil deposits underlying the Project site are composed of loose to medium dense fills, including hydraulically placed fills composed of sands with varying amounts of silts, bay deposits, and Quaternary-age deposits, all of which exist below the water table. Results of a liquefaction assessment for the Project site indicate that the fill soils below the groundwater table and bay deposits are liquefiable, whereas the denser and more clayish weathered strata of the terrace deposits and Bay Point Formation soils are not liquefiable (TerraCosta 2015).

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<sup>7</sup> <https://www.sandiego.gov/sites/default/files/legacy/development-services/pdf/industry/geoguidelines.pdf>.

Lateral displacements at the Project site are estimated to be on the order of 6 to 22 feet near the top of the bayfront descending slope. In addition, lateral displacements are expected to extend landward from the bayfront slope in a diminishing manner. Given that Harbor Island is approximately 320 feet wide at the location of the Project site, it is anticipated that lateral spreading could affect the majority of Harbor Island, with ground cracking associated with differential lateral displacements occurring across Harbor Island.

The bayfront descending slope located along the northern shore of Harbor Island, which is composed of fill soils, is underlain by both bay deposits and the Bay Point Formation. From approximate elevation +3 feet to elevation -13 feet (locally -22 feet), the slope is composed and underlain by liquefiable fill and bay deposit soils, which are anticipated to lose significant strength as the result of liquefaction. Consequently, this slope is prone to seismic instability. Given the relatively slender width of Harbor Island at 320 feet, under a severe earthquake event (i.e., 2,000-year design event), the majority of the Project site would experience significant ground damage.

The proposed improvements to the HIWM are still in preliminary planning stages (i.e., no building plans are currently available) but will be designed according to the recommendations in the geotechnical studies (**MM-GEO-1**; Appendices D and E) to account for seismic concerns, including strong ground shaking, liquefaction, and lateral displacement, and in accordance with the current California Building Code. The recommendations in Appendix D for landside improvements include measures for: site preparation and earthwork; ground improvements and/or foundation design. Final design measures would be selected through evaluation of potentially viable methods when more detailed plans are available. The recommendations in Appendix E for waterside improvement include: options for foundations (gravity mat or pile-supported) for the two new approach piers, embedment depth for piles; and, pile jetting and driving recommendations. Because the proposed project would be engineered to eliminate the liquefaction hazard and would not exacerbate the potential for liquefaction to occur, impacts associated with liquefaction or other seismic-related ground failure would be less than significant.

#### ***iv) Landslides?***

**No Impact.** Landslide activity generally occurs in areas that lack vegetation and have steep slopes (typically, with grades of 30 percent or more). The City of San Diego Safety Study, Geologic Hazards and Faults, Sheet 16, does not identify the Project site as being within Hazard Category 21 (Confirmed, known, or highly suspected landslide) or Hazard Category 22 (Possible or conjectured landslide) (City of San Diego 2008). In addition, no existing landslide areas are located adjacent to the Project site. Based on the relatively flat topography of the Project site, landslides would not be anticipated to occur. Therefore, no impacts would occur with the construction or operation of the proposed Project and no mitigation measures are required.

#### ***b. Would the project result in substantial soil erosion or the loss of topsoil?***

**Less Than Significant Impact.** The proposed Project would involve landside and waterside earthwork that would include grading, excavation, pile driving, and other standard construction practices. During construction, the proposed Project would be required to comply with the BMPs contained within its SWPPP, a regulatory requirement of the NPDES permit issued by the San Diego RWQCB, which would identify the BMPs required to properly control erosion and siltation impacts during construction of the proposed Project. The site-specific SWPPP and BMPs would be designed to minimize erosion and runoff during construction activities. For a complete analysis discussion on the required stormwater measures, see Section X, *Hydrology and Water Quality*. Erosion-related impacts during the construction phase would be less than significant.

Once construction is completed, only landscaped areas may have exposed soils, while the rest of the Project site would be developed with structures or paved with asphalt or concrete. In the landscaped areas, soils would be contained within planters and medians and would not be susceptible to erosion. In addition, permanent BMPs identified in the Project's Storm Water Quality Management Plan (SWQMP) would be installed to prevent loss of on-site soils (see Section X, *Hydrology and Water Quality*, for more information on the SWQMP). With implementation of the BMPs identified in the SWPPP and SWQMP and requirements

identified by the Project's NPDES permit, soil erosion-related impacts during operation of the proposed Project would be less than significant.

- c. *Would the project be located on geologic units or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?***

**Less Than Significant Impact.** Refer to responses VI. a) ii – iv above. Landslides are not considered to be hazards at the Project site, but the Project site is located on fill soils that would be subject to lateral spreading, liquefaction, and collapse. However, the proposed Project will adhere to the recommendations in the geotechnical studies to account for seismic concerns, including strong ground shaking, liquefaction, and lateral displacement, in accordance with the current California Building Code. Because the proposed project would be engineered to eliminate the liquefaction hazard and would not exacerbate the potential for liquefaction to occur, impacts associated with liquefaction or other seismic-related ground failure would be less than significant. Due to these onsite conditions and compliance with the applicable regulations, the proposed project would not exacerbate existing unstable conditions.

- d. *Would the project be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2010), creating substantial direct or indirect risks to life or property?***

**Less Than Significant Impact.** Expansive soils are fine-grained soils (generally, high-plasticity clays) that can undergo a significant increase in volume with an increase in water content or, conversely, a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures that have been built on the soil. The proposed Project site is underlain by fill materials and bay deposits. These materials are anticipated to be sandy in nature and possess a low Expansion Index (EI). Expansive soils are not considered to be a geotechnical hazard at the Project site according to the site-specific soil sampling effort (TerraCosta 2015). A less than significant impact is anticipated to occur and no mitigation measures would be required.

- e. *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

**No Impact.** The proposed Project does not include the construction and operation of septic tanks or alternative wastewater disposal systems. The existing pump-out facility on the Project site is plumbed through the HIWM sewer lines and then flows directly into the City sewer system. The replacement pump-out facility is anticipated to be designed similarly to the existing facility. As such, the proposed Project would not result in any impacts regarding inadequate soils to support septic systems. With the Project site's use of a pump-out facility and existing sewer lines for disposal of wastewater, the Project would not use septic tanks or alternative wastewater disposal systems. No impacts would occur and no mitigation measures are required.

- f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

**Less Than Significant Impact.** A geotechnical study of the Project site (Appendix D and Appendix E) indicates that the Project site rests on artificial fill underlain by the Bay Point Formation, which is a near-shore marine sedimentary deposit that dates from the middle to late Pleistocene, roughly 600,000 to 10,000 years ago. In the Project site, Bay Point Formation was encountered below -13 feet MLLW and -27.5 feet MLLW. The Bay Point Formation is assigned high resource sensitivity by the City of San Diego due to a variety of invertebrate and vertebrate fossils that have been previously found in this deposit, including both marine and terrestrial animals, with mammoth and whale remains being some of the most significant. The City of San Diego's CEQA Significance Determination Thresholds state that potential significant impacts on the Bay Point Formation could occur if Project-related activities reach depths greater than 10 feet and remove more than 1,000 cubic yards (cy) of soil (City of San Diego 2016). However, based on the Paleontological Monitoring Determination Matrix, monitoring is not required when grading on documented or undocumented artificial fill.

The proposed Project would require construction on both the landside and waterside portions of the Project site. For landside improvements, it is anticipated that digging and trenching activities would not go deeper than 6 feet, which is 4 feet above the depth at which high sensitivity begins. The proposed Project would also involve excavation activities for landside improvements which would require the exportation of less than 1,000 cubic yards of soil from the Project site. This is less than the threshold identified by the City. In addition, Harbor Island is created from documented artificial fill. Therefore, construction of the proposed landside improvements are not anticipated to impact fossil sensitive soil deposits and no paleontological monitoring would be required.

For waterside improvements, the demolition of the existing dock system would require the removal of the existing concrete piles, which would result in disturbance of the bay floor. Installation of the concrete piles to support the new dock system configuration would require driving piles in new locations within the marina and approximately 25 feet deep in the bay floor. However, the driven concrete piles would not expose deposits from the Bay Point Formation because soil would not be removed during installation. Therefore, the proposed Project would result in less than significant impacts to paleontological resources and no mitigation measures are required.

## VIII. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

Emissions modeling has been prepared for the proposed Project (Appendix A), which was used, along with other information, in this section to evaluate the potential greenhouse gas (GHG) impacts of the proposed Project. GHGs are gases that absorb infrared radiation in the atmosphere. This absorption traps heat, maintaining the earth's surface temperature at a level higher than would be the case in the absence of GHGs, leading to many disruptions to natural earth processes. GHGs include water vapor, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), perfluorocarbons, hydrofluorocarbons, and halogenated chlorofluorocarbons. The primary GHGs associated with the proposed Project are CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. To simplify reporting and analysis, GHGs are commonly defined in terms of a global warming potential (GWP). The Intergovernmental Panel on Climate Change (IPCC) defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO<sub>2</sub>e).

A variety of legislation has been enacted at the state level related to climate change and achieving statewide GHG emissions reductions from all sectors of the economy. Assembly Bill (AB) 32 (2006) codified the state's GHG emissions targets and requires CARB to implement emission limits, regulations, and other measures to reduce statewide GHG emissions to 1990 levels by 2020. CARB adopted the Climate Change Scoping Plan (Scoping Plan) in December 2008, which outlines measures for meeting the 2020 GHG emissions reduction limits. Senate Bill (SB) 32 was signed in 2016 and expands on AB 32, requiring CARB to ensure statewide emissions are reduced to at least 40 percent below 1990 levels by 2030. The most recent Scoping Plan update was released in 2016, and outlines policies and actions for the state's 2030 GHG emissions target, as outlined in SB 32.

The State CEQA Guidelines require lead agencies to describe, calculate, or estimate the amount of GHG emissions that would result from a project, and emphasize the necessity to determine potential climate change effects of a project and propose mitigation as necessary. They do not recommend a specific analysis methodology or quantitative criteria for determining the significance of GHG emissions. However, the Guidelines do confirm the discretion of lead agencies to determine appropriate significance thresholds. Moreover, State CEQA Guideline Section 15183.5(a) provides that a lead agency may analyze and mitigate significant effects of GHG emissions at a programmatic level, such as in a plan targeted to reduce GHG emissions, and that future projects that fit within this reduction plan may tier off and incorporate by reference the environmental analysis done for such plans.

CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reducing GHG emissions. In December 2013, the Board of Port Commissioners approved a Climate Action Plan (CAP) to reduce GHG emissions on District tidelands (District 2013a). The CAP includes a variety of potential GHG reduction policies and measures selected to help meet the District's GHG reduction goals of 10 percent less than 2006 levels by 2020, and 25 percent less than 2006 levels by 2035. A critical aspect of having a CAP that fits the criteria within State CEQA Guidelines Section 15183.5 is to have reduction targets that align with statewide goals. The CAP meets the requirements of State CEQA Guidelines Section 15183.5 as specified in Appendix A of the CAP for 2020, but does not meet the requirements under 15183.5 for 2035. Moreover, the CAP does not cover construction activities.



Several agencies throughout the state, including multiple air districts, have drafted and/or adopted varying threshold approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. Some commonly used threshold approaches include (1) consistency with a qualified GHG reduction strategy, (2) performance-based reductions, (3) numeric “bright-line” thresholds, and (4) efficiency-based thresholds. No threshold applicable to a construction project at the District has been formally adopted.

### **Analysis of Environmental Impacts**

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

#### **Less Than Significant Impact.**

Consistent with established protocols, GHG emissions resulting from construction of the proposed Project are summed and amortized over the expected life of the proposed Project.<sup>8</sup> Temporary construction emissions would be generated by heavy equipment, heavy duty and passenger vehicle trips, and a workboat. Emissions from these sources were estimated using the CalEEMod™ Model and emission factors from the Port of San Diego (2018) and CARB (2010). Total GHG emissions associated with construction of the proposed Project are summarized in Table 14.

**Table 14. Summary of Estimated Construction GHG Emissions (metric tons per year)**

<b>Construction Activity</b>	<b>CO<sub>2</sub></b>	<b>CH<sub>4</sub></b>	<b>N<sub>2</sub>O</b>	<b>CO<sub>2</sub>e</b>
<b>Phase I (2019)</b>				
Demolition of docks	35	<1	<1	36
Installation of docks	518	<1	<1	526
Building Demolition	15	<1	<1	15
Parking Lot Demolition	78	<1	<1	80
Landscape Removal	1	<1	<1	1
Building Construction	10	<1	<1	10
Parking Lot Paving	91	<1	<1	93
<b>Phase II (2020)</b>				
Parking Lot Demolition	16	<1	<1	16
Building Demolition	44	<1	<1	44
Landscape Removal	10	<1	<1	10
Building Construction	51	<1	<1	51
Landscape Installation	11	<1	<1	12
Parking Lot Paving	37	<1	<1	37
<b>Total Construction Emissions (2019 + 2020 Year 1 + Year 2)</b>	<b>917</b>	<b>&lt;1</b>	<b>&lt;1</b>	<b>931</b>
<b>Annual Amortized Construction Emissions (30 Years)</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>31</b>

Source: Emissions modeling (Appendix A)

CO<sub>2</sub>e = carbon dioxide equivalent, CO<sub>2</sub> – carbon dioxide, CH<sub>4</sub> = methane, N<sub>2</sub>O = nitrous oxide, MT = metric tons

<sup>8</sup> Consistent with established protocols and published guidance from other lead agencies and air districts, construction emissions are amortized over the typical operational life of a project and added to annual operational emissions. In this case, the operational life of the Project is the duration of that lease, which is 50/40 years. The majority of guidance and protocols has suggested a 20- or 30-year project life for typical development projects, and while the operational life of the proposed project is longer, assuming a shorter operational duration allows for a more conservative analysis in that construction emissions are divided by a smaller number. In this case, construction GHG emissions are amortized over a 30-year project life to ensure a conservative analysis consistent with guidance and protocols.

Once constructed, the types of operational uses are not expected to change under the proposed Project. Emissions would be generated by area (e.g., landscaping equipment), energy (e.g., electricity and natural gas consumption), mobile (e.g., visitor trips, recreational boating), water consumption, and waste generation. As discussed in Section III, *Air Quality*, operation of the existing ~~HIWM~~ HIWM uses currently generates GHG emissions, which would be effectively replaced with operational emissions associated with the Project. The difference, or *delta*, in operational emissions between the existing uses and the Project represents the net new impact of the Project analyzed in this analysis. Estimated operational emissions under both existing and Project conditions are summarized in Table 15. The Project was assumed to be fully operational in three years~~2024~~. Refer to Appendix A for the modeling outputs.

**Table 15. Summary of Existing and Project Operational GHG Emissions (metric tons per year)**

Condition/Source	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
<b>Existing Conditions (2018)</b>				
Area Source	<1	<1	<1	<1
Energy Source	384	<1	<1	385
Mobile Source (vehicles)	1,954	<1	<1	1,957
Mobile Source (boating)	108	<1	<1	109
Waste Generation	25	2	<1	63
Water Consumption	7	<1	<1	8
Total Existing Conditions	2,478	2	<1	2,522
<b>Project Conditions (2024)</b>				
Area Source	<1	<1	<1	<1
Energy Source	161	<1	<1	162
Mobile Source (vehicles)	1,750	<1	<1	1,753
Mobile Source (boating)	<del>428</del> <u>145</u>	<1	<1	<del>430</del> <u>146</u>
Waste Generation	18	1	<1	45
Waste Generation	5	<1	<1	6
Amortized Construction (see Table 14)	31	<1	<1	31
Total Project Conditions	<del>2,063</del> <u>110</u>	1	<1	<del>2,095</del> <u>143</u>
<b>Net Emissions</b>				
Project minus Existing	<del>-415</del> <u>368</u>	<1	<1	<del>-427</del> <u>376</u>

Source: Emissions modeling (Appendix A)  
CO<sub>2</sub>e = carbon dioxide equivalent  
CO<sub>2</sub> = carbon dioxide  
CH<sub>4</sub> = methane  
N<sub>2</sub>O = nitrous oxide  
MT = metric tons

As shown in Tables 14 and 15, the amount of Project-related MTCO<sub>2</sub>e construction emissions would be 31 MTCO<sub>2</sub>e per year. After construction, the proposed Project would result in a decrease in operational emissions at HIWM relative to existing conditions. As shown in Table 15, the proposed Project would result in a ~~94-80~~ 427-376 MTCO<sub>2</sub>e/year reduction in GHG emissions relative to existing conditions, which is equivalent to removing ~~94-80~~ 91-80 passenger vehicles from the road for a single year (EPA 2018). As such, the proposed Project would result in a net emissions benefit over the life of the Project.

The proposed Project is also consistent with the District's CAP, which accounts for continued growth of District operations in an efficient and sustainable manner. The proposed Project would not increase the size nor capacity of the HIWM due to the reduction in total building area and just a small increase (3) in the number of slips on the site. Thus, net operational emissions would decrease as a result of the proposed Project. While the CAP does not assign percent reductions to individual businesses or operations, the proposed Project would be consistent with the goals of the CAP because it would reduce emissions

associated with building electricity and natural gas use due to the reduction in building size and inclusion of water and energy conservation measures. Therefore, the proposed Project would result in a less than significant impact associated with the generation of GHG emissions and contribution to global climate change from both its construction and its 40-year operation.

***b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?***

**Less Than Significant Impact.** At the state level, AB 32 codified the state's GHG emissions reduction targets for 2020 and identified the acceptable level of GHG emissions in California, while SB 32 codified the state's GHG emissions reduction targets for 2030 and identified the acceptable level of GHG emissions in California. To reach the target level, there will have to be widespread reductions in GHG emissions across California. Some reductions will need to come in the form of changes pertaining to vehicle emissions and mileage standards. Some will come from changes pertaining to sources of electricity and increased energy efficiency at existing facilities. The remainder will need to come from plans, policies, or regulations that will require new facilities to have lower carbon intensities than they have under BAU conditions. At the local level, the District adopted their CAP in December 2013. The CAP identified the District's reduction goals and measures to be implemented to achieve the reduction goals set forth in AB 32 and long-term goals beyond 2020. Therefore, AB 32, SB 32, and the District's CAP represent the most applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

The proposed Project is consistent with the District's CAP. Although the CAP accounts for continued growth of District operations in an efficient and sustainable manner (meaning it is not a "net zero" GHG emission plan), the proposed Project would not increase the size or capacity of the HIWM because it proposes to maintain the facility with a similarly sized marina and associated buildings. Thus, net operational emissions would not increase as a result of the proposed Project.

While the CAP does not assign percent reductions to individual businesses or operations (although it does by sector), the proposed Project would be consistent with the goals of the CAP because it would reduce emissions associated with building electricity and natural gas use due to the reduction in building size and inclusion of water and energy conservation measures. The proposed Project is further consistent with the CAP because it would replace light fixtures in a non-District facility with lower energy bulbs, consistent with CAP reduction measure EB6.<sup>9</sup> The proposed Project would also include the replacement of existing landscaping with drought-tolerant landscaping and increase the area of landscaping on the site consistent with CAP reduction measure EH3.<sup>10</sup> In addition, the proposed Project would be required to recycle at least 65 percent of all construction debris per the requirements of the City of San Diego's Construction and Demolition Debris Deposit Ordinance consistent with CAP reduction measure SW1.<sup>11</sup> Therefore, the construction and operation of the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs, and the impact would be less than significant.

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<sup>9</sup> CAP Reduction Measure EB6: Replace light fixtures in non-Port facilities with lower energy bulbs such as fluorescent, LEDs, or CFLs.

<sup>10</sup> CAP Reduction Measure EH3: Evaluate existing landscaping and options to convert reflective and impervious surfaces to landscaping, and install or replace vegetation with drought-tolerant, low-maintenance native species that can also provide shade and reduce heat island effects.

<sup>11</sup> CAP Reduction Measure SW1: Increase the diversion of solid waste from landfill disposal.

## IX. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

The Project site is located on the San Diego Bay with the HIWM sited at the location since 1972. An ICF hazardous materials specialist visited the Project site on November 17, 2014, and interviewed the Director of Marina Operations, who has worked at the Project site for 25 years and is knowledgeable about existing operations and the history of the Project site. The results of the site visit, the interview, and record searches conducted through the databases maintained by the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), and the County of San Diego Department of Environmental Health are summarized below.

Gasoline and diesel are currently stored at the Project site as part of normal operations. There are three 12,000-gallon underground storage tanks (USTs) in the western portion of the site (two for diesel and one for gasoline). Fuel lines are piped from the landside area of the site, where the USTs are located, then through the Tom Ham's Lighthouse leasehold via a long-term easement, then on to the fueling dock's dispenser in the marina at the northwestern boundary of the site.

In addition to gasoline and diesel, small quantities of other hazardous materials are also stored at the site for use in regular dock maintenance activities. The on-site maintenance shop (west of the restaurant/office building) is used principally for storage. Contained inside are a number of items related to maintaining marine facilities, including polyvinyl chloride (PVC) piping, glue, paints, paint brushes, cleaning solvents, petroleum products, filters, absorbent pads, and batteries. All paints and cleaning solvents observed during site reconnaissance were in 1-gallon (or smaller) containers. No strong odors were noticed, and no spills or other indications of significant releases were observed.

A small maintenance shed on the western landside end of the property also contains hazardous materials. The maintenance shed houses pallets of mortar, which are used for patching dock surfaces. It also contains paints for the exterior and interior surfaces of the building. The paints were stored in 1-gallon containers. Three 55-gallon drums of engine oil as well as approximately eight empty 55-gallon oil drums were also in the shed. No strong odors were noticed, and no spills or other indications of significant releases were observed. The on-site buildings were constructed prior to 1980. Therefore, the potential exists for the structures to contain asbestos-containing materials (ACMs) and lead-based paints.

Research conducted on the SWRCB GeoTracker and DTSC EnviroStor websites identified the Project site as being part of a leaking underground storage tank (LUST) cleanup program (DTSC 2018; SWRCB 1989, 1993). Two separate LUST incidents were reported. The first release was in 1989, consisting of waste motor/hydraulic/lubricating oil being released to soil and groundwater. The second incident occurred in 1993 and consisted of a diesel fuel release to soil and groundwater. Closure was granted for both incidents in 2004 by the County of San Diego Department of Environmental Health.

### **Analysis of Environmental Impacts**

#### ***a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less Than Significant Impact.** The proposed Project involves redevelopment of several improvements at HIWM. Construction of the proposed Project would require landside and waterside demolition and installation activities that would include grading, excavation, pile driving, and other standard construction practices. Heavy equipment that would be used during construction of the proposed Project would use substances such as oil, diesel fuel, gasoline, hydraulic fluid, and other liquid materials that would be considered hazardous if improperly stored or handled. In addition, materials such as paints, roofing materials, solvents, and other substances typically used in building construction would be located on the Project site during construction and used to construct the Project. The use and storage of hazardous substances are governed by a series of regulations summarized below:

- **Spill Prevention, Control, and Countermeasure Plans (40 CFR 112.7).** Spill Prevention, Control, and Countermeasure (SPCC) plans are required for facilities in which construction and operations involve oil in the vicinity of navigable waters or shorelines. SPCC plans ensure that facilities implement containment plans and other countermeasures to prevent oil spills from reaching navigable waters. SPCC plans are regulations administered by the EPA. Preparation of an SPCC plan is required for projects that meet three criteria: (1) the facility must be non-transportation related or construction must involve storing, using, transferring, or otherwise handling oil; (2) the project must have an aggregate aboveground storage capacity greater than 1,320 gallons or completely buried storage capacity greater than 42,000 gallons; and (3) there must be a reasonable expectation of a discharge into or upon navigable waters of the United States or adjoining shorelines. For construction projects (criterion 1), 40 CFR 112 describes the requirements for implementing SPCC plans.

- **Resource Conservation and Recovery Act (RCRA) (42 United States Code [USC] 6901 et seq.).** Hazardous waste in California is regulated primarily under the authority of the Federal Resource Conservation and Recovery Act (RCRA) (42 United States Code [USC] 6901 et seq.). Under the authority of RCRA, the regulatory framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste, is found in 40 CFR 260–299.
- **49 CFR 172 and 173.** These regulations establish standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes as well as training requirements for personnel who complete shipping papers and manifests.
- **40 CFR Subchapter I—Solid Wastes.** These regulations implement the provisions of the Solid Waste Act and RCRA. They also establish criteria for the classification of solid waste disposal facilities (landfills), hazardous waste characteristics and regulatory thresholds, and hazardous waste generator requirements. They also establish requirements for managing used oil and universal wastes.
- **Department of Transportation Hazardous Materials Regulations (49 CFR 100–185).** U.S. Department of Transportation (DOT) Hazardous Materials Regulations cover all aspects of hazardous materials packaging, handling, and transportation. Parts 107 (Hazardous Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance) would all apply to goods movement to and from the project site and/or surrounding areas.
- **California Health and Safety Code.** DTSC, a department of the California Environmental Protection Agency (Cal/EPA), is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Division 20, Chapter 6.5, of the California Health and Safety Code deals with hazardous waste control through regulations pertaining to transportation, treatment, recycling, disposal, enforcement, and the permitting of hazardous waste. Division 20, Chapter 6.10, contains regulations applicable to the cleanup of hazardous materials releases. Title 22, Division 4.5, contains environmental health standards for the management of hazardous waste. This includes standards for the identification of hazardous waste (Chapter 11) as well as standards that are applicable to transporters of hazardous waste (Chapter 13).
- **Hazardous Waste Control Act (Health and Safety Code Section 25100 et seq.).** DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA for a cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements. The regulations below help the state enforce the Hazardous Waste Control Act.
- **Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (California Health and Safety Code Chapter 6.11, Sections 25404–25404.9).** This program consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA for San Diego County is the Department of Environmental Health's Hazardous Materials Division (HMD), which has responsibility and authority for implementing and enforcing the requirements for Aboveground Petroleum Storage Act Requirements for SPCC Plans, the California Accidental Release Prevention (CalARP) Program, the Hazardous



Materials Business Plan/Hazardous Materials Inventory Statements, Hazardous Waste Generator Program, and the Underground Storage Tank Program.

- **California Code of Regulations, Title 8—Industrial Relations.** The federal Occupational Safety and Health Administration (OSHA) and the California Division of Occupational Safety and Health (Cal/OSHA) are responsible for ensuring worker safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards would be applicable to both construction and operation of the proposed Project. Included in Title 8 are regulations pertaining to hazard control (including administrative and engineering controls), hazardous chemical labeling and training requirements, hazardous exposure prevention, hazardous material management, and hazardous waste operations.

Title 8 also specifies requirements for the removal and disposal of ACMs. In addition to providing information regarding how to remove ACMs, specific regulations limit the time of exposure, regulate access to work areas, require demarcation of work areas, prohibit certain activities in the presence of ACM removal activities, require the use of respirators, require monitoring of work conditions, require appropriate ventilation, and require qualified persons for ACM removal.

Title 8 also covers the removal of lead-based paint. Specific regulations cover the demolition of structures that contain lead-based paint, the process associated with its removal or encapsulation, remediation of lead contamination, the transportation/disposal/storage/containment of lead or materials containing lead, and maintenance operations associated with construction activities involving lead, such as lead-based paints. Similar to ACM removal, lead-based paint removal requires proper ventilation, respiratory protection, and qualified personnel.

- **California Labor Code (Division 5, Parts 1 and 7).** California Labor Code regulations ensure appropriate training regarding the use and handling of hazardous materials and the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who handle hazardous materials are appropriately trained and informed about the materials. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.
- **Standard UL 2248, Marina Fuel Storage, Piping, and Dispensing Systems.** Standard UL 2248 applies to marina fueling systems intended for temporary storage (tank system), transporting (piping from tank to dispensing system), and the dispensing of flammable or combustible liquids, such as gasoline or diesel fuel, on waterways serviced by land-based marinas that service floating vessels. UL 2248 addresses potential risks to public safety, including fire, electrical, environmental, and mechanical hazards. UL 2248 requires secondary containment to prevent leaks from entering the surrounding environment, continuous monitoring for leakage, and both audible and visual alarms. USTs must comply with UL 58 (Standard for Steel Underground Tanks for Flammable and Combustible Liquids), UL1316 (Glass-Fiber-Reinforced Plastic Underground Storage Tanks for Petroleum Products, Alcohols, and Alcohol-Gasoline Mixtures), and API Specification 12B (Specification for Bolted Tanks for Storage of Production Liquids). Aboveground piping must comply with UL 2405 (Aboveground Secondly Contained Piping for Flammable Liquids), which requires secondary containment to prevent any leaks to the environment.

The hazardous substances that would be utilized during the construction and operation of the proposed Project would continue to be compliant with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and local CUPA regulations. As hazardous substances would be stored and used in accordance with applicable regulations that are designed to protect the public and the environment, a less than significant impact would occur. In addition, because the existing buildings were constructed prior to the general ban on the application of ACMs and lead-based paints in construction that occurred during the 1970s, ACM or lead-based paints may be present in existing buildings. ACM or lead based paint would be removed in accordance with existing regulations which require that testing, removal, and disposal be

conducted by a qualified and licensed professional as required by CCR, Title 8—Industrial Relations. Moreover, development and demolition projects within San Diego County, regardless of whether ACM is suspected on-site, must conform with SDAPCD Rule 1206. SDAPCD Rule 1206 ensures proper documentation, removal, and disposal procedures are enforced during renovation and/or demolition activities of existing buildings. In addition, SDAPCD Rule 1206 requires that SDAPCD is notified in writing at least 10 days in advance of any renovation or demolition activity. As discussed in the Project Description compliance with all regulatory requirements and laws is a standard condition of the proposed CDP. Therefore, the demolition of the existing facilities related to ACM or lead-based paint would result in less than significant impacts.

Operation of the proposed Project may include the transportation and storage of hazardous materials, such as fuels, cleaning solvents, or pesticides. Similar to the use of hazardous materials, the transportation and storage of hazardous materials would continue to be compliant with applicable regulations, such as the RCRA, DOT Hazardous Materials Regulations, and local CUPA regulations. As such, the storage, use, and disposal of hazardous materials during project operations would continue, with quantities similar to existing conditions, and compliance with regulations and laws related to such uses would remain in effect. In addition, the HIWM has historically been certified in the Clean Marine Program, which develops BMPs for hazardous materials and water quality associated with various marina activities. The HIWM has previously had two 5-year certifications and is currently awaiting certification for the next 5-year period. HIWM has not proposed any change to these BMPs as part of the Project and hence, they would continue to be implemented.

Gasoline and diesel would continue to be stored in three 12,000-gallon USTs (two for diesel and one for gasoline). Fuel dispensed during 2017 consisted of approximately 506,000 gallons of gasoline and 1,225,595 gallons of diesel. As a preventative measure, the fuel dispenser nozzles are wrapped with absorbent cloth to minimize spillage. Spill response materials are located on-site, consisting of absorbent swaddles that remove fuel sheen from the surface of the water. The storage of fuel and the UST maintenance would continue to be compliant with applicable regulations, such as the DOT Hazardous Materials Regulations and local CUPA regulations.

Small quantities of other hazardous materials are stored on-site for use in regular dock maintenance activities, as described in the Environmental Setting section. However, the types and quantities of hazardous materials stored on-site would not change under the proposed Project. Hazardous materials stored on-site would continue to be compliant with applicable regulations described above.

The fuel dispenser and piping, located on the HIWM dock, would be the only components of the fuel tank system modified during construction. Pipes would be capped off so that the fuel tanks would no longer be operational during replacement of piping and dispensers. Once the dock is assembled, the fuel dispensers would be reconnected to the fuel tank. The UST is not placed on the dock and would not be modified or replaced during construction. While not proposed, any future modifications to the system would comply with the requirements of Standard UL 2248 which regulates marina fuel storage, piping, and dispensing systems. UL 2248 requires secondary containment to prevent leaks from entering the surrounding environmental, continuous monitoring for leakage, and requires audible and visual alarms and addresses potential risks to public safety, including fire, electrical, environmental, and mechanical hazards.

Hazardous materials and wastes produced on site during construction and operation are subject to requirements associated with accumulation time limits, proper storage locations and containers, and proper labeling. Such transport, use, and disposal would be compliant with applicable regulations described above, such as the RCRA and U.S. DOT Hazardous Materials Regulations. Furthermore, as described in Title 49 of the Code of Federal Regulations and implemented by Title 13 of the CCR, the U.S. Department of Transportation Office of Hazardous Materials Safety has established strict regulations for the safe transportation of hazardous materials. Compliance with applicable regulations would reduce impacts associated with the use, transport, and storage of hazardous materials during construction and operation of the proposed Project to a less than significant level.

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

**Less Than Significant Impact with Mitigation Incorporated.** As discussed and analyzed under response IX.a., typical construction-related hazardous materials would be used during construction of the proposed Project, including fuels, solvents, paints, oils, grease, and caulking, as well as the removal of ACM and lead-based paint that was used in the original construction. It is possible that these substances could be released during construction activities. However, compliance with federal, state, and local regulations, in combination with construction BMPs that are part of the SWPPP and designed to regulate runoff, discussed in more detail in *Section X, Hydrology and Water Quality*, would ensure that all hazardous materials would be used, stored, and disposed of properly. Testing, removal, and disposal of ACM and lead-based paints would be conducted in accordance with existing regulations (e.g., CCR, Title 8—Industrial Relations).

During landside construction activities, the demolition of existing buildings and the parking lot, landscape removal, construction of new buildings and parking, and landscape installation would occur. A site visit, interview, and records search were conducted through the databases maintained by the Department of Toxic Substances Control (DTSC), the SWRCB, and the County of San Diego Department of Environmental Health. As noted in the Environmental Setting, the Project site was identified as being part of a LUST cleanup program, with two separate LUST incidents (Case #H10538-001 and #H10538-002). Both LUST incidents were deemed remediated from the County of San Diego Department of Environmental Health (DEH) in 2004. The Project site has been remediated to the satisfaction of the County of San Diego DEH and construction of landside improvements would not excavate soils around the fuel tanks.

During demolition and construction of the proposed Project, approximately 16,860 cubic yards of construction debris from the demolished docks, buildings, and surface paving would be exported from the Project site. The construction debris would be recycled or disposed of at a licensed landfill (West Miramar Landfill), which has controls in place to prevent the leaching of hazardous materials into the environment.

During waterside construction activities, the existing dock system would be disassembled, existing concrete piles removed, a new dock system and concrete piles would be installed. The demolition of the existing dock system is anticipated to be disassembled by hand tools and work boat with the disassembled pieces rafted together with rope and floated where docks can be removed out of the water by either a land based crane, forklift, or waterside barge. Removed docks would then be hauled off to the landfill by truck. Landfills have controls in place to prevent the leaching of hazardous materials into the environment. Therefore, the removal and disposal of the existing dock system would not result in significant impacts associated with the use, transport, or storage of hazardous materials.

The removal and installation of concrete piles would use a hydraulic jetting process with the last 5 to 10 feet utilizing pile driving equipment for final pile placement. The hydraulic jetting process utilizes a carefully directed and pressurized flow of water to assist in pile placement. The removal and installation of concrete piles supporting the dock system would disturb sediments contained within the bottom of the marina through the impact hammer pile driving or jetting process. The impact hammer pile driving or jetting process would result in sediments being suspended in the affected water column during removal and installation. However, the removal and installation of the concrete piles would occur intermittently as the demolition and reconstruction of the dock system would occur one dock at a time.

The suspension of sediments in the water could result in turbidity impacts as well as the release of potentially contaminated sediments. Turbidity impacts and mitigation measures are discussed in more detail in *Section X, Hydrology and Water Quality*. **MM-HWQ-1** requires the implementation of a silt curtain around pile driving activities, which would restrict the sediment turbidity plume to the area within the curtain and would prevent sediment from spreading out through the Bay. However, the silt curtain would not restrict potential sub-surface contamination from being brought to the surface. As such, **MM-HAZ-1** would be implemented to avoid hazards to the public and environment associated with any disturbed, impaired sediments. The measure would involve sediment sampling following pile driving and applicable remediation activities, if necessary. Through implementation of **MM-HWQ-1** and **MM-HAZ-1**, the Project would not create a significant hazard to the public or the environment through the release of hazardous materials, and impacts would be less than significant.

**MM-HAZ-1: Conduct Sediment Sampling and Implement Remediation Measures.** At the conclusion of the pile driving, the Project Applicant shall conduct sediment sampling of representative areas of potential disturbance near the location of piles. Sampling shall be conducted in accordance with the Water Quality Control Plan for Enclosed Bays and Estuaries (SWRCB 2009). Sediment sampling results shall rely on the Effects Range – Low (ER-L) and Effects Range – Medium (ER-M) guideline values of the National Oceanic and Atmospheric Association (NOAA) Screening Quick Reference Tables (Buchman 2008). If the sediment samples show concentrations of sediment contamination above the guideline values, the Project Applicant shall delineate the extent of cross-contamination and propose remediation approaches (subject to approval by the District and any other agencies with jurisdiction over site contamination) that may include, but are not limited to, dredging, placement of sand cover, or Enhanced Monitored Natural Recovery (EMNR) sand containing active carbon. The Project Applicant shall implement the approved remediation. The results of the sampling and remediation shall be documented in a report to be reviewed and approved by the District, RWQCB, and any other appropriate regulatory agencies.

The HIWM is currently operating and would continue to operate as an active marina facility. Therefore, operational activities under the proposed Project would be similar to existing conditions. As such, the storage, use, and disposal of hazardous materials during Project operations would continue, with quantities similar to existing conditions. As mentioned above, the delivery, handling, and disposal of these hazardous materials would continue to be subject to applicable regulations, such as the RCRA, DOT, and local CUPA regulations. Operation of the proposed Project is not expected to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, with compliance with federal, state, and local regulations less than significant impacts would occur from construction or operation of the proposed Project and no mitigation measures would be required.

***c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

**No Impact.** No existing or proposed schools are located within a 0.25 mile radius of the Project site. Baypoint Preschool, located at 2850 Wasp Way, is the nearest school to the Project site. This school is located approximately 0.50 mile northwest of the Project site. Because there are no schools located within 0.25 mile of the Project site, no impact would occur from construction or operation of the proposed Project and no mitigation measures would be required.

***d. Would the project 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?***

**Less Than Significant Impact.** As discussed above, research conducted with GeoTracker and EnviroStor during an online records review identified two separate LUST incidents (Case #H10538-001 and #H10538-002) within the Project site (DTSC 2018; SWRCB 1989, 1993). The first release was reported in 1989, consisting of waste motor/hydraulic/lubricating oils being released to soil and groundwater. The second incident occurred in 1993, consisting of a diesel fuel release to soil and groundwater. The 1993 release was discovered when the steel single-walled USTs were being replaced with fiberglass double-walled USTs. The accessible hydrocarbon-affected soil was excavated before the new USTs were installed. Residual affected soil was remediated through soil vapor extraction. Both LUST incidents were deemed remediated and the incidents closed from the County of San Diego DEH in 2004. There are no other hazardous materials sites within 0.25 mile of the Project site.

Because the Project site has been remediated to the satisfaction of the County of San Diego DEH and because the proposed Project would not excavate soils around the fuel tanks, implementation of the proposed Project would not create a significant hazard to the public or the environment associated with being located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, impacts associated with this issue would be less than significant and no mitigation measures would be required.

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

**Less Than Significant Impact.** The closest public use airport to the Project site is SDIA, located approximately 0.5 mile north of the Project site. Airport Influence Area boundaries around the SDIA have been adopted by San Diego County Regional Airport Authority in its Airport Land Use Compatibility Plan (ALUCP). Based on the ALUCP, the Project site is located within Review Area 1 of the Airport Influence Area for SDIA (SDCRAA 2014).

Airport Land Use Commission review is required for land use plans and regulations within Review Area 1 proposing increases in height limits and for land use projects that:

- Have received from the Federal Aviation Administration (FAA) a Notice of Presumed Hazard, a Determination of Hazard or a Determination of No Hazard subject to conditions, limitations or marking and lighting requirements; and/or
- Would create any of the following hazards:
  - Glare
  - Lighting
  - Electromagnetic interference
  - Dust, water vapor, and smoke
  - Thermal plumes
  - Bird attractants

During project construction, the tallest feature would be the construction cranes, which would have a maximum height of 40 feet above ground level. The tallest feature associated with the proposed Project during operation would be the marina buildings, which would have a maximum height of 42 feet above grade.

The proposed Project was submitted to ALUC staff for preliminary project review on March 26, 2018 and August 14, 2018. Based on the preliminary project review and location of the Project site outside of the ALUCP noise contours and safety zones, the proposed Project would not require ALUC review. However, an FAA determination would be needed for the proposed building and the construction crane.

Structures developed under the proposed Project would be similar in height to existing structures, and operational activities would be similar to existing conditions. Consequently, the proposed Project does not include project design features that would create safety hazards for people residing or working in the area. Furthermore, the FAA would be notified at least 45 days prior to construction because of the proximity of the site to a navigational facility. Although the FAA has not made a final determination, this impact is anticipated to be less than significant given the distance from the airport, the low profile of the proposed Project, and the fact that it would simply replace existing structures. In the event that the FAA requires changes to the proposed Project, the changes would be reflected in the *Project Description* section of the MND through the addendum process or, if the changes could result in a new significant impact, recirculation of the Draft IS/MND for public comment may occur, or a new supplemental analysis would be prepared if the Final IS/MND has already been adopted. There are no other airports or ALUCPs in the vicinity of the proposed Project.

Potential noise impacts are discussed in Section XIII. Impacts would be less than significant.

- f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** Emergency response and evacuation is the responsibility of the San Diego Harbor Police Department, under direction of County of San Diego Office of Emergency Services (OES). Redevelopment

of the Project site would include both waterside and landside infrastructure demolition and construction. During construction, the proposed Project would be required to comply with applicable requirements set forth by the OES Operational Area Emergency Operations Plan<sup>12</sup> (OA EOP), the San Diego Harbor Police Department, and the San Diego Fire-Rescue 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 OAEOP and responding agencies that service the Project site.

Existing access to the Project site is from Harbor Island Drive at the southern Project boundary. Construction-related traffic activity would consist of material delivery and truck haul use as well as construction worker commute trips. Although the proposed Project would generate traffic trips during construction, the amount of trips anticipated would not interfere with emergency access. During construction, portions of the parking lot would be utilized for a staging and laydown area. However, ingress and egress from Harbor Island Drive would not be impeded. In addition, site-specific activities, including temporary construction activities, are reviewed and approved on a project-by-project basis by the District when development plans are submitted. The District ensures that emergency access is maintained during construction through its project review and approval process. Thus, emergency access would be maintained during construction of the proposed Project and no impacts associated with interference with an adopted emergency response plan would occur. After construction, the equipment would be removed and access to the entire parking lot would be restored.

Operation of the proposed Project would not include any characteristics (e.g., permanent road closures, long-term obstruction of road access) that would physically impair or otherwise interfere with emergency response or evacuation in the Project vicinity. No impacts associated with interference with an adopted emergency response plan would occur during operation of the proposed Project.

***g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?***

**No Impact.** The Project site is located on Harbor Island, near downtown San Diego and adjacent to San Diego Bay. Based on the City of San Diego Official Very High Fire Hazard Severity Zone Map, Sheet 14, the Project site is not within an area identified as a high fire hazard severity zone (City of San Diego 2009). In addition, there are no wildlands or heavily vegetated areas in the vicinity of the proposed Project site. Construction and operation of the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, no impacts would occur and no mitigation measures are required.

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<sup>12</sup> [https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency\\_management/plans/op-area-plan/2018/2018-EOP-Complete-Plan.pdf](https://www.sandiegocounty.gov/content/dam/sdc/oes/emergency_management/plans/op-area-plan/2018/2018-EOP-Complete-Plan.pdf)



## X. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate Regional Water Quality Control Board water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 erosion or siltation on- or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

The Project site is located on and adjacent to the San Diego Bay. The Project site is subject to wave forces from tides, winds, boats and ships, and sea-level rise. The Project site is also located within the jurisdiction of the San Diego RWQCB and therefore must comply with the Water Quality Control Plan (Basin Plan). The Project site is within the Pueblo San Diego hydrologic unit (HU) (Figure 17). Basin Plans are the regional water quality control plans required by both the CWA and Porter-Cologne Water Quality Control Act in which beneficial uses, water quality objectives, and implementation programs are established in order to maintain water quality. San Diego falls under the San Diego Region Hydrologic Basin Planning Area. Beneficial uses of inland surface waters in the Pueblo HU are limited to contact (potential use) and non-contact recreation, warm freshwater habitat, and wildlife habitat, whereas San Diego Bay receiving waters support an extensive array of beneficial uses related to industrial uses, navigation, contact recreation, non-contact recreation, commercial and sport fishing, preservation of biological habitats of special significance, estuarine habitat, wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, and shellfish harvesting. No potable water supply is currently taken from sources within the Pueblo HU (Project Clean Water 2016).

San Diego Bay is listed under CWA Section 303(d) as impaired for mercury (year 2027), polycyclic aromatic hydrocarbons (PAHs) (year 2025), and polychlorinated biphenyls (PCBs) (year 2019). San Diego Bay Shoreline at Harbor Island (West Basin) is impaired for copper (year 2019). The 303(d)-listed impairments are based on the *2014/2016 California Integrated Report* (SWRCB 2018). TMDLs have not yet been established for these water bodies. Other major impacts on the Pueblo HU include surface water quality degradation, habitat degradation, sediment toxicity in San Diego Bay, and sewer overflows. The principal constituents of concern include trace metals, toxic substances, and coliform bacteria, primarily resulting from urban runoff. Runoff would discharge from the Project's bay frontage and toward Harbor Island Drive. Stormwater runoff is collected in storm drains located within the Project site parking lot and conveyed to the bay. The San Diego Bay is the receiving water body for surface water runoff from the Project site, which occurs either directly from sheet flow, or indirectly via storm drains. The closest dam to the Project site is Chollas Dam, located 8.5 miles to the east.

Groundwater at the site is directly tied to the San Diego Bay. The water has a high salt content from being directly associated with the bay and is not suitable for consumption. Borings were taken to estimate groundwater depth within the Project site as part of the proposed Project's geotechnical analysis (Appendix C). On the landside portion of the Project site, groundwater was encountered at a depth of approximately 12 feet (elevation +4 feet MLLW). The depth to groundwater is directly related to the level of water within the bay and, as such, expected to vary with the tides.

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site.

The Municipal Stormwater Permit (Order No. R9-2013-0001 as amended by Order Nos. R9-2015-001 and R9-2015-0100) is an NPDES permit issued that requires the owners and operators of Municipal Separate Storm Sewer System (MS4s) within the San Diego Region to implement management programs to limit discharges of pollutants and non-stormwater discharges to and from their MS4 from all phases of development.

In compliance with the Municipal Stormwater Permit, the District developed a Jurisdictional Runoff Management Program (JRMP) that addresses issues related to construction activities and issues related to existing development. The District also adopted a jurisdiction-specific local BMP Design Manual in accordance with the Municipal Stormwater Permit that includes post-construction stormwater requirements for development projects under District jurisdiction. All new development and redevelopment projects are required to implement standard source control and site design BMPs to eliminate or reduce stormwater runoff pollutants. The JRMP requires that project applicants submit a Stormwater Quality Management Plan (SWQMP) accurately describing how the project will meet source control site design and pollutant control BMP requirements. The BMP Design Manual is intended to help a project applicant develop a SWQMP that complies with local and MS4 Permit requirements.

General requirements for the BMPs to be included in the SWQMP include the following.

- Onsite BMPs must be located so as to remove pollutants from runoff prior to its discharge to any receiving waters, and as close to the source as possible.
- Structural BMPs must not be constructed within waters of the United States.
- Onsite BMPs must be designed and implemented with measures to avoid the creation of nuisance or pollution associated with vectors (e.g., mosquitos, rodents, flies).

Source control BMPs must be implemented at all development projects where applicable and feasible. Source control BMP requirements include the following.

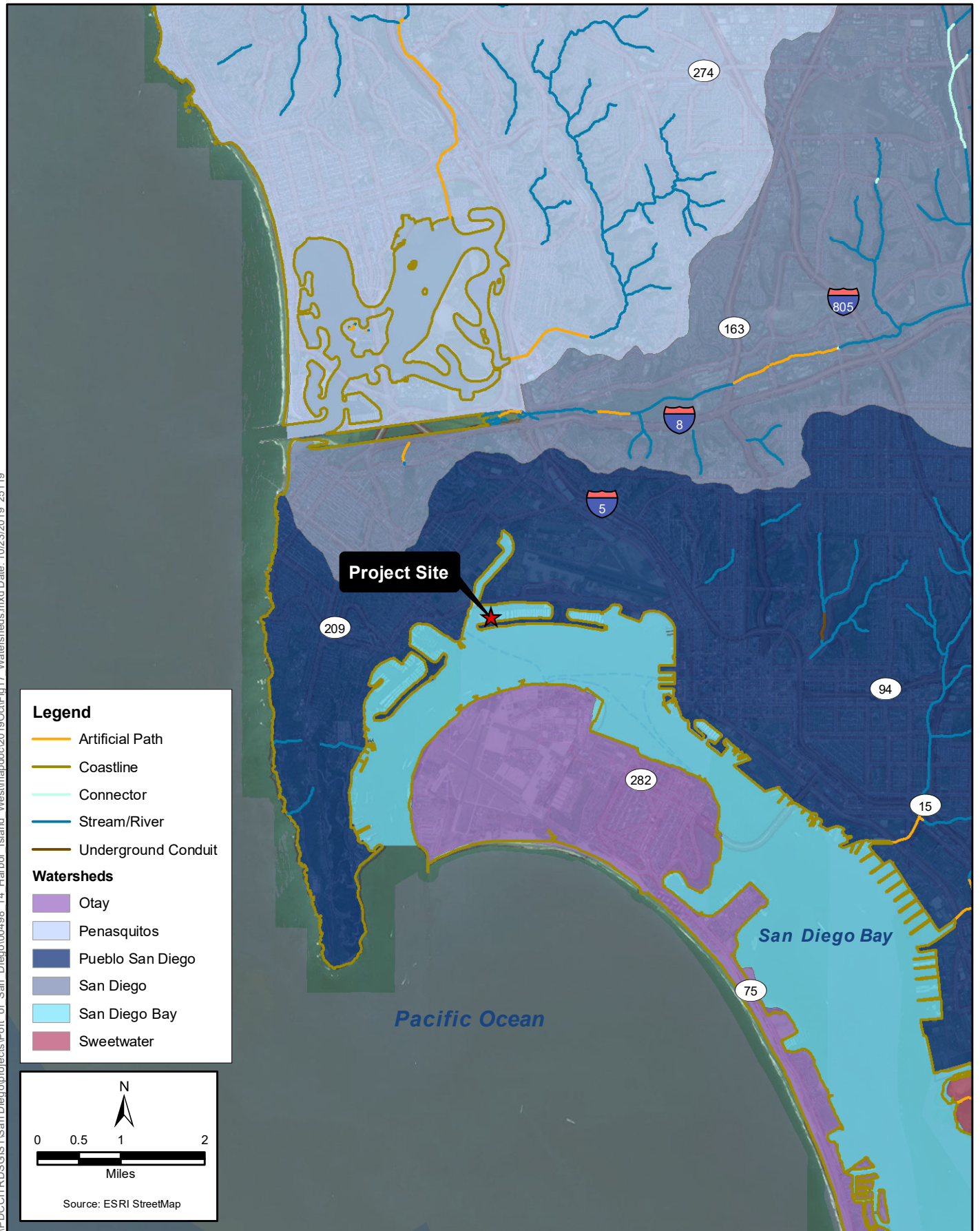
- Prevention of illicit discharges into the MS4.
- Storm drain system stenciling or signage.
- Protection of outdoor material storage areas from rainfall, run-on, runoff, and wind dispersal
- Protection of materials stored in outdoor work areas from rainfall, run-on, runoff, and wind dispersal.
- Protection of trash storage areas from rainfall, run-on, runoff, and wind dispersal.
- Use of any additional BMPs determined to be necessary by the District to minimize pollutant generation at each project.

Site Design BMPs must be implemented at all development projects where applicable and feasible. Site Design BMP requirements include the following.

- Maintenance or restoration of natural storage reservoirs and drainage corridors (including topographic depressions, areas of permeable soils, natural swales, and ephemeral and intermittent streams).
- Buffer zones for natural water bodies (where buffer zones are technically infeasible, project applicant is required to include other buffers such as trees, access restrictions, etc.).
- Conservation of natural areas within the project footprint including existing trees, other vegetation, and soils.
- Construction of streets, sidewalks, or parking lot aisles to the minimum widths necessary, provided public safety is not compromised.
- Minimization of the impervious footprint of the project.
- Minimization of soil compaction to landscaped areas.
- Disconnection of impervious surfaces through distributed pervious areas.
- Landscaped or other pervious areas designed and constructed to effectively receive and infiltrate, retain, and/or treat runoff from impervious areas, prior to discharging to the MS4.
- Small collection strategies located at, or as close as possible to, the source (i.e., the point where stormwater initially meets the ground) to minimize the transport of runoff and pollutants to the municipal and receiving waters.
- Use of permeable materials for projects with low traffic areas and appropriate soil conditions.
- Landscaping with native or drought-tolerant species.
- Collecting and using precipitation.

In addition to the site design and source control BMPs discussed above, Priority Development Projects (PDPs) are required to implement stormwater pollutant control BMPs to reduce the quantity of pollutants in stormwater discharges. Stormwater pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of stormwater runoff produced from a 24-hour, 85<sup>th</sup> percentile storm event (Design Capture Volume) on the project site.

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**Figure 17**  
**Regional Watersheds and Nearby Tributaries**  
**Harbor Island West Marina Redevelopment Project**

## **Analysis of Environmental Impacts**

### **a. *Would the project violate Regional Water Quality Control Board water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

**Less Than Significant with Mitigation Incorporated.**

#### ***Construction – Waterside Improvements***

In-water construction activities have the potential to affect water quality standards or waste discharge requirements. Water quality concerns associated with in-water construction activities typically include disturbed sediments, turbidity, and pollutants associated with ground disturbance, spills, and polluted runoff. In addition, the delivery, handling, and storage of construction materials and wastes (e.g., concrete debris), as well as the use of heavy construction equipment, could also result in stormwater contamination, thereby affecting water quality. Construction activities that involve the use of chemicals and operation of heavy equipment could also result in accidental spills of hazardous materials (e.g., fuel and oil) during construction activities, which are discussed in Section IX, *Hazards and Hazardous Materials*.

Waterside construction activities associated with the proposed Project would include in-water work, such as demolition and installation of docks, pile removal and pile driving, and operation of heavy equipment in and near the marina, such as a crane barge, workboat, and landside crane. Construction materials involved in these improvements would include concrete, wood, glass, sheetrock, insulating materials, bonding chemicals, foam, plastics, rubber, steel, and other metals. Waterside improvements would involve sediment disturbance along the marina floor and increases in turbidity within the water column from the removal and reinstallation of piles for the dock.

Temporary water quality impacts would occur during removal and construction activities associated with the waterside development because of resuspension of sediments that contain organic compounds and the debris that could be produced during removal. As is typical for marina projects, disruption of sediments could adversely affect water quality by temporarily resuspending sediments, thereby increasing turbidity. Therefore, these in-water construction activities would result in short-term disturbance of localized Bay sediments and temporary impacts on water quality.

To ensure that no nuisance turbidity affects water quality, **MM-HWQ-1** through **MM-HWQ-3** shall be implemented. These mitigation measures are based on the District best management practices (BMPs) and Environmental Standards (collectively, “Standards”) for any and all routine repairs and maintenance activities that involve existing overwater structures (District 2019). The Standards address how to conduct and monitor in-water construction activities that may increase turbidity, including, without limitation, pile removal and installation via jetting, impact hammer and various vibratory methods, to ensure water quality standards are not exceeded.

**MM-HWQ-1: Implementation of Best Management Practices During Hydraulic Jetting and Pile Driving.** The following best management practices (BMPs) shall be implemented during the Project’s hydraulic jetting process:

- **Pile Jetting:** Contractor shall control sediment displacement by reducing the jetting volume and/or velocity where feasible. Prior to pile jetting, the contractor shall first “stab” the pile into the bottom substrate to advance it through the upper layer of soft sediment and then jet the pile to reduce sediment disturbance during jetting operations.
- **Silt Curtains:** Silt curtains shall be in place for the entirety of the Project (i.e., installed before the jetting process begins and not be removed until the pile driving is completed for all piles). The silt curtains shall be placed as close to the construction zone as practical and extend to the bottom but should not rest on the seafloor based on tidal variations. Given the tidal variation at the Harbor Island West Marina, the length of the silt curtains shall be adjusted to accommodate varying water levels (e.g., use of curtains with reefing or furling lines). The maximum water depth in the vicinity of the Harbor Island West Marina is approximately 20 feet at high tide; therefore, a 19 foot deep silt curtain shall likely be sufficient for the deepest areas. Shorter curtains may

be used in shallower areas. Silt curtain specifications shall be provided to the District prior to installation. Silt curtain deployment shall be monitored by the construction contractor personnel proficient in all aspects of silt curtains to ensure that turbidity does not escape and tidal currents do not cause deflection, and that the curtain length is properly set. Torn or damaged curtains shall be repaired or replaced immediately.

- **Debris Handling:** Removed pilings, debris, and any adhering sediment shall be disposed of off-site by the contractor. If sediment must be stored at the Project site prior to disposal, it should be placed in containers or lined/covered storage areas constructed to prevent release and spillage.
- **Surface Boom:** A floating surface boom shall be used to capture floating debris. The boom shall be placed at a sufficient distance from the construction area so as to capture all debris. Debris should be removed at the end of every work day, or sooner. In the case of rough waters, debris shall be removed immediately. If there is any reason to believe that there will be any oil, fuel, creosote, or other similar materials released during jetting, absorbent pads shall be required in conjunction with the boom.
- **Utility Boat:** A small boat shall be available throughout the duration of waterside Project construction to manage the silt curtains, booms, and debris.
- **Equipment Inspection:** All jetting equipment, including hoses, lines, and jet pumps, shall be inspected daily and replaced or repaired accordingly.
- **Navigation Restrictions:** Work activities and restrictions to boat navigation shall be scheduled and coordinated ahead of time with the District and Harbor Island West Marina and Sheraton San Diego Hotel and Marina tenants. Sufficient notification shall be provided. In the event that emergency vessel traffic must be accommodated, the contractor shall move the BMPs immediately.
- **Structure Demolition:** To the greatest extent possible, any structures requiring demolition shall be removed whole and dismantled at a location away from the water.
- **Daily Inspection:** All BMPs shall be inspected at least daily. Any faulty/failing equipment shall be repaired/replaced as necessary. Daily visual water quality monitoring shall include monitoring for any visible turbidity plumes, oil or sheens, floating debris, or water discoloration associated with project construction activities and shall be conducted a minimum of one hour after commencement of construction activities with the potential to cause sediment disturbance. A monthly report of the monitoring shall be compiled and submitted to the District's Engineering and Construction Management Department. If a turbidity plume is observed, response actions shall be immediately taken (see MM-HWQ-2).

**MM-HWQ-2: Implementation of Best Management Practices for Turbidity Monitoring During Hydraulic Jetting and Pile Driving.** The following best management practices (BMPs) for turbidity monitoring shall be implemented during the Project's hydraulic jetting and pile driving processes:

- Turbidity shall be monitored a minimum of once per week at mid-depth of water column. The monitoring shall include the following:
  - **Monitoring Stations** – During weekly monitoring turbidity shall be measured at the construction site after pile driving activities have been underway for at least one hour and at a reference site. Monitored water quality measurements shall be compared to ambient San Diego Bay reference measurements located outside of the construction area (outside silt curtain) that are not impacted by the construction.



- Project Compliance Stations – A minimum of three locations shall be established as compliance stations for the collection of water quality monitoring data. Compliance station data shall be compared to reference station data to determine if the construction activities are impacting water quality based on the Performance Standards (see below). Compliance stations shall be located evenly along an arc located 200 feet from the edge of the construction area to capture all tidal and current conditions. The locations may be adjusted in the field to better target a visible turbidity plume, if a visible plume is observed.
- Reference Station – A minimum of one station shall be established as a reference station to measure ambient San Diego Bay water quality conditions and shall be located in the direction of the mouth of the Bay and 1,000 feet beyond the influence of construction activities. Natural turbidity shall be determined through measurements at the reference station in order to compare the reference station measurements to compliance stations measurements.
- Global Position System – Monitoring station positions will be located using a Global Position System (GPS) accurate to within  $\pm 3$  meters.
- Performance Standards – The following turbidity standards are based on recent Regional Water Quality Control Board permit requirements (e.g., RWQCB, 2016; RWQCB, 2017) and are required to meet performance standards:
  - If reference station turbidity is between 0 to 50 NTUs, the maximum increase from construction activities must not exceed 20 percent of the measured turbidity at the reference station. If reference station turbidity is between 51 to 100 NTUs, the maximum increase from construction activities must not exceed 10 NTUs. If reference turbidity is greater than 100 NTUs, the maximum increase from construction activities must not exceed 10 percent above the reference levels.
- Response Actions to Water Quality Monitoring Exceedance - In the event that visual observations or the water quality monitoring described above in MM-HWQ-2, indicate an exceedance of an applicable receiving water Performance Standard, the following actions shall be implemented:
  - Immediately re-take water measurements at reference and compliance stations in accordance with the procedures in MM-HWQ-2.
  - Evaluate the measurements at background and compliance monitoring stations and use visual observations to determine whether the exceedance is caused by construction activities or by other ambient conditions in San Diego Bay such as wind waves, boat wakes, barge/ship traffic, and storm inflow.
  - If the exceedance is confirmed to be a result of the project construction, monitor conducting the water quality monitoring shall coordinate with the District's Engineering and Construction Management Department to immediately notify the contractor to modify or cease operations related to in-water construction activities and/or inspect the BMP's to ensure they are working properly to mitigate the exceedance. Operational modifications may include fixing, adjusting, maintaining, and/or upgrading silt curtains or use of a second silt curtain.
  - Re-evaluate water measurements at all relevant stations no more than 30 minutes later, after additional BMPs or operational modifications are implemented.
  - If the receiving water performance standards exceedance continues to persist, even with additional BMPs, determine and implement operational modifications including modifying the rate of jetting, waiting longer to initiate pile driving, or perform more start-stops until the

exceedance levels comply with the performance standards. If necessary, corresponding construction activities shall be stopped until performance standards are met. Typically, turbidity is reduced within one hour.

**MM-HWQ-3: Implementation of Best Management Practices for Visual Monitoring During Hydraulic Jetting and Pile Driving.** Implement the following response actions to visual plumes observed outside of the silt curtain:

- If the condition of the silt curtain is observed to be damaged, no longer positioned around the in-water construction area, or has gaps where a visible turbidity plume is forming outside of the silt curtain, the contractor shall act immediately to correct the silt curtain to prevent any turbidity outside the silt curtain.
- Actions to ensure the silt curtain is functioning shall include, but are not limited to, work stoppage to inspect the silt curtain; repair the silt curtain; position or reposition the silt curtain around the active work area; ensure the silt curtain has no gaps; implementation of operational modifications (e.g., fixing, adjusting, maintaining, and/or upgrading silt curtains); and/or, implementation of a second silt curtain.
- If receiving water quality monitoring indicates an exceedance of the Performance Standards, construction activities shall be halted until measured turbidity has decreased to levels below Performance Standards.
- All response actions shall be documented and reported to the District in writing and by phone immediately.

In addition, the proposed Project would be required to obtain from USACE a Section 10 permit for the placement of piles and docks and breakwater in navigable waters. Section 10 of the Rivers and Harbors Act of 1899 requires authorization from USACE for the construction of any structure in or over any navigable water of the United States. A Section 10 permit would be required to be obtained prior to initiating construction activities for the marina. USACE would issue a public notice to interested parties to solicit comments on the project, and, after evaluating the comments and information received, USACE would make a decision to issue or deny a permit based on compliance with its regulations and other laws. In addition, the proposed Project would be required to obtain a corresponding Water Quality Certification (Section 401 permit) from the RWQCB for the federal permits from USACE. A Section 401 permit is required by USACE for Section 10 Permit issuance. Once the RWQCB deems a 401 application is complete, a public notice and 21-day comment period follow. Following the public comment period, additional information may be required or a public hearing with the RWQCB would be scheduled. The RWQCB-issued Water Quality Certification would specify methods for ensuring the protection of water quality during construction activities in the Bay, including water quality monitoring requirements in order to meet the Basin Plan water quality objectives; also, beneficial uses may require mitigation for impacts on waters of the U.S. In addition, the 401 permit would list specific conditions for the use of in-water construction BMPs to minimize the discharge of construction materials from construction activities, control floating debris, and provide spill containment and cleanup equipment to control potential accidental spills in order to meet the Basin Plan water quality objectives and beneficial uses.

The Construction General Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) by a certified Qualified SWPPP Developer (QSD), which identifies several types of construction BMPs to reduce the discharge of pollutants into surface waters. This is discussed further under the landside construction section.

With implementation of **MM-HWQ-1** through **MM-HWQ-3**, as well as **MM HAZ-1**, in water construction of the proposed Project would result in less than significant impacts on water quality.

### ***Construction – Landside Improvements***

Landside construction activities would include soil disturbance from concrete removal, grading, and repaving related to building demolition and construction; utility improvements; vegetation removal and planting; construction staging; and operation of heavy equipment for excavation and grading operations. Demolition would include abatement activities associated with hazardous materials on-site, removal of existing structures, removal of any concrete slabs, removal of any utilities, and repaving the Project site with asphalt or concrete pavement.

The impact of landside construction-related materials on water quality would vary, depending on the duration and timing of activities. Water quality would be temporarily affected if disturbed sediments or other construction-related pollutants were discharged to nearby storm drains and/or the marina. In addition, construction activities could result in the erosion of disturbed soil by wind and rain. They could also increase the amount of suspended solids contained in stormflows, resulting from the erosion of exposed soil during construction. Other pollutants of concern are chemicals from heavy equipment or construction-related materials. Other contaminants that could enter runoff from the construction site include metals, petroleum products, and trash. Concrete, soap, trash, and sanitary wastes are other common sources of potentially harmful materials on construction sites. Wash water from equipment and tools and other waste dumped or spilled on the construction site can lead to the seepage of pollutants into watercourses. Also, construction chemicals may be accidentally spilled into watercourses. All of these potential construction contaminants could contribute to the degradation of water quality in the bay during construction of the proposed Project.

The proposed project would disturb more than 1 acre of land. Therefore, compliance with the Construction General Permit would require development and implementation of a SWPPP by a Qualified SWPPP Developer. The SWPPP would identify which construction BMPs would be implemented in order to protect stormwater runoff, and include a monitoring plan for measuring BMP effectiveness. BMPs are required to be inspected regularly by a Qualified SWPPP Practitioner. The Qualified SWPPP Practitioner monitors the construction activities to ensure the BMPs listed in the SWPPP are implemented and performing as anticipated.

A variety of construction BMPs would be required to be implemented throughout construction in order to protect water quality. Several of the minimum construction BMPs are listed in Table 16. At a minimum, BMPs would include practices to minimize the contact of construction materials, equipment, and maintenance supplies (e.g., fuels, lubricants, paints, solvents, adhesives) with stormwater. The construction SWPPP would specify properly designed, centralized storage areas that keep these materials out of the rain. When grading is conducted during the rainy season, the primary BMPs selected would focus on erosion control (i.e., keeping sediment in place) and then on sediment control (i.e., keeping sediment on site). Measures would include a range of stormwater control BMPs, including installing erosion control such as silt fences, staked fiber rolls, and geofabric to prevent silt runoff to storm drains or waterways. Topsoil and backfill would be stockpiled, protected, and replaced at the conclusion of construction activities. Disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule for turf, plants, and other landscaping vegetation.

**Table 16. Minimum BMPs for Construction Sites**

<b>BMP Category</b>	<b>BMP</b>
Project Planning	Minimization of areas that are cleared and graded to only the portion of the site that is necessary for construction Develop and implement a SWPPP or Construction BMP Plan Contractor Training (formal training or District staff training)
Non-Stormwater Management	Water Conservation Practices (NS-1) Illicit Connection/Illegal Discharge Detection and Reporting (NS-6) Dewatering Operations (NS-2) Paving and Grinding Operations (NS-3) Potable Water/Irrigation (NS-7) Vehicle and Equipment Cleaning (NS-8) Vehicle and Equipment Fueling (NS-9) Vehicle and Equipment Maintenance (NS-10)
Good Housekeeping/ Waste Management	Cover construction material stockpiles such as treated lumber during wet weather (WQIP Strategy PO-13) Material delivery and storage (WM-1) Material Use (WM-2) Solid Waste Management (WM-5) Stockpile Management (WM-3) Spill Prevention and Control (WM-4) Hazardous Waste Management (WM-6) Contaminated Soil Management (WM-7) Concrete Waste Management (WM-8) Sanitary/Septic Waste Management (WM-9) Construction Road Stabilization (TC-2) Stabilized Construction Entrances (TC-1) Entrance/Outlet Tire Wash (TC-3)
Erosion Control <sup>a</sup> (choose at least one or a combination based on site conditions)	Preservation of Existing Vegetation (EC-2) Minimization of Exposure Time of Disturbed Soil Areas Scheduling (EC-1) <sup>b</sup> Hydraulic Mulching (EC-3) Soil Binders – (EC-5) Straw Mulches (EC-6) Wood Mulching – (EC-8) Geotextiles and Mats (EC-7) Wind Erosion Control (WE-1) Soil Preparation/Roughening (EC-15) Preservation of Natural Hydrologic Features Where Feasible Permanent Revegetation or Landscaping as Early as Feasible
Sediment Control (choose at least one or a combination based on site conditions)	Silt Fence (SE-1) Street Sweeping and Vacuuming (SE-7) Sand Bag Barrier (SE-8) Storm Drain Inlet Protection (SE-10) Sediment Trap (SE-3) Sediment Basin (SE-2) Check Dams (SE-4) Fiber Rolls (SE-5) Gravel Bag Berms (SE-6) Compost Socks and Berms (SE-13)
Run-on and Runoff Control	Protect site perimeter to prevent run-on from entering the site and site runoff

Source: District 2015.

<sup>a</sup> Erosion controls must be implemented in all inactive disturbed soil areas. An inactive disturbed soil area is where construction activities such as grading, clearing, excavation, or disturbances to ground are not occurring and those that have been active and are not scheduled to be re-disturbed for at least 14 days.

<sup>b</sup> Limitation of grading to a maximum disturbed area, determined by the District to be 5 acres during the rainy season and 17 acres during the non-rainy season, before either temporary or permanent erosion controls are implemented to prevent stormwater pollution (see Section 5.6.1 of the JRMP for additional information).

In addition to the SWPPP, the project proponent would be required to implement the construction BMPs identified in the District's JRMP. The SWPPP would specify construction BMPs to ensure that water quality standards or waste discharge requirements are not violated. BMPs selected would be designed to comply with the requirements of the District's JRMP and the Construction General Permit and would be subject to review and approval by the District. Construction-related measures would include BMPs from the following categories, and as listed in Table 16.

- Project Planning
- Non-Stormwater Management
- Good Housekeeping/Waste Management
- Erosion Control
- Sediment Control
- Run-on and Run-off Control

Excavation required for utility relocation would extend approximately 5 feet below ground surface and digging or trenching activities for building foundations would not extend beyond 6 feet below ground surface. Groundwater was encountered at approximately 12 feet below the Project site (Appendix E); therefore, it is unlikely that groundwater would be encountered and dewatering would not be required. Because the proposed Project would comply with **MM-HWQ-1** through **MM-HWQ-3**, Section 10 and Section 401 permits, and the BMPs contained in the SWPPP and District's JRMP; properly dispose of potentially hazardous materials, consistent with the regulations discussed in Section IX, *Hazards and Hazardous Materials*; and avoid impacts on groundwater, water quality impacts related to landside construction would be less than significant. No violations of water quality objectives or waste discharge requirements would occur, and impacts would be less than significant.

#### ***Operation – Waterside Improvements***

Water quality concerns associated with typical marina operational activities include generation and use of materials that, if uncontained, could result in pollution. Operations at the proposed Project marina would remain consistent with existing uses and include routine maintenance activities; waste storage, handling, and disposal; outdoor parking; patronage of commercial/retail uses; as well as vessel storage and use. Potential pollutants that may be generated during operations at the marina include metals, nutrients, oil and grease, organics, sediment, and trash. Pollutants generated from boat hull maintenance, in-water cleaning, and leaking oil may impair water quality and threaten the health of, and toxicity to, aquatic systems. Chemicals used in top-side and underwater cleaning can also degrade water quality. Water quality impacts can be avoided or lessened by using non-toxic cleaning products, minimizing or eliminating toxic cleaning agents, and implementing practices that prevent or reduce opportunities for toxic products to contact surface water.

Water quality impacts from copper-based hull paints have been identified in marina basins throughout California (District 2017b). Copper has been a standard ingredient in hull paints for many decades, and the paint has caused exceedances of water quality standards throughout the San Diego Bay. Copper-based antifouling hull paints are currently the most commonly used antifouling coating. The San Diego Bay shoreline at Harbor Island West Basin is currently listed on the SWRCB 303(d) list of water quality impairments for copper. In addition, there is an existing TMDL for copper for the Shelter Island Yacht Basin located southwest of the project site in the Bay.

The proposed project would result in an ~~reduction~~increase of on-site boat slips by three slips. While it is not anticipated that boating activities would increase, the proposed Project would allow for the continued use of the site as a marina through a new lease. As such, the proposed project would continue to contribute to the existing copper impairment in the Harbor Island West Basin albeit slightly less than existing conditions given the fewer boat slips. However, given a TMDL is currently under development, the project would continue to contribute to the copper impairment of the Harbor Island West Basin. However, impacts would

be less than significant through compliance with the District's In-Water Hull Cleaning Ordinance<sup>13</sup> combined with ongoing efforts of the District's Copper Reduction Program including: in-water hull cleaning policy development & legislation; monitoring and data assessment; hull paint conversion; alternative hull paint testing and research; and, outreach. The In-Water Hull Cleaning Ordinance requires businesses that perform in-water hull cleaning to secure a permit to ensure that best management practices generally recognized by the industry and being effective and environmentally sound are adhered to. Therefore, water quality impacts related to Project operation on the waterside would be less than significant.

### ***Operation – Landside Improvements***

Proposed changes to the landside portion of the Project site would involve the removal of the 23,000 square feet of existing buildings and construction of approximately 15,682 square feet of new buildings. In addition, existing landscaping would be removed and new drought-resistant landscaping would be installed, increasing the overall landscaped area from 15,000 square feet to 18,000 square feet. The existing asphalt parking lot would be demolished and repaved, resulting in a decrease from 120,000 square feet to 116,000 square feet of pavement area. The increased landscaped areas would reduce pollutant discharges and treat stormwater runoff through biological uptake, allowing plant materials to filter pollutants.

As described above in the existing setting, all new development and redevelopment projects are required to comply with the District's JRMP and complete and submit to the District a SWQMP accurately describing how the project will meet applicable stormwater requirements. Projects categorized as Priority Development Projects (PDPs) must incorporate stormwater pollutant control BMPs into the site design and, where applicable, address potential hydromodification impacts from changes in flow and sediment supply. The proposed Project would qualify as a PDP pursuant to the MS4 (R9-2013-0001 as amended) and under the BMP Design Manual because it is a redevelopment project that creates or replaces more than 5,000 square feet of impervious areas. Accordingly, the Project proponent would ensure that post-construction designs and/or controls for minimizing urban runoff pollution would be incorporated into the proposed Project, consistent with the Port's BMP Design Manual (District 2018b). In general, the BMP Design Manual provides updated procedures for planning, selecting, and designing permanent structural stormwater BMPs based on specific performance standards. BMP maintenance requirements are also addressed to ensure ongoing pollution prevention. Stormwater pollutant control BMPs are engineered facilities that are designed to retain (i.e., intercept, store, infiltrate, evaporate, and evapotranspire), biofilter, and/or provide flow-through treatment of stormwater runoff produced from a 24-hour, 85th percentile storm event (Design Capture Volume) on the Project site. Typical BMPs that would be implemented by the proposed Project to reduce post-construction impacts include:

- Landscaping shall be designed to minimize irrigation and runoff and promote surface infiltration, where appropriate.
- Rain shutoff devices shall be employed to prevent irrigation after precipitation.
- Permeable materials shall be used to promote surface infiltration, where appropriate.
- Landscaped or other pervious areas shall be constructed to receive and infiltrate, retain, and/or treat surface runoff from impervious areas.
- Compliance with the BMP Design Manual (District 2018b), which includes source and treatment-control BMPs, shall be ensured.

Because operation of the proposed Project would comply with the District's In-Water Hull Cleaning Ordinance and the ongoing efforts of the District's Copper Reduction Program as well as implementing requirements of the District's JRMP and BMP Design Manual, to minimize the amount of post-construction water runoff flowing to the Bay, through structural treatment controls and applicable hydrological capture requirements (see response X.c.ii), water quality impacts related to Project operation would be less than significant. Therefore, no violations of water quality standards or waste discharge requirements, and no

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<sup>13</sup> <https://pantheonstorage.blob.core.windows.net/administration/Ordinance-No-2681-An-Ordinance-Amending-Unified-Port-District-Code-Section-414-Regulation-of-In-Water-Hull-Cleaning.pdf>



degradation of surface or groundwater quality would occur. Impacts would be less than significant with mitigation incorporated.

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

**No Impact.** The proposed Project would involve demolition and repaving of existing impervious surfaces. Groundwater depths at the Project site are approximately 12 feet below the existing grade (Appendix E). Site grading and trenching are not anticipated to go more than 6 feet below the existing grade; thus, dewatering would not be required. After construction, the proposed Project would decrease the total amount of impervious surfaces by approximately 3,000 square feet. The decrease in impervious surfaces would allow additional ground absorption of stormwater under post-construction conditions. However, it should be noted that the Project site is also close to San Diego Bay; groundwater in the area is saline from saltwater intrusion. As such, the Project site is not considered to be an area identified for water recharge activities.

Project construction and operation does not propose to use groundwater resources or to otherwise affect any groundwater resources that are used for water supply. Potable water for the facility comes from the City of San Diego. More information on potable water supply is provided in Section XIX, *Utilities and Service Systems*. Since the proposed Project would not deplete groundwater supplies or interfere substantially with groundwater recharge, no impact associated with this issue would occur as a result of construction or operation of the proposed Project and no mitigation measures are required.

***c. Would the project 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 that would:***

***i. Result in substantial erosion or siltation on- or off-site;***

**Less Than Significant.** See responses X.a and X.b. The proposed Project involves the repair, maintenance, and replacement of several elements comprising of the HIWM. Construction of the proposed Project would involve landside and waterside earthwork that would include grading, excavation, pile driving, and other standard construction practices. During construction, the proposed Project would be required to comply with Section 401 permit and the BMPs contained in the SWPPP and District's JRMP. BMPs would minimize the potential for erosion and sedimentation in nearby storm drains and temporary changes in drainage during construction. For example, exposed stockpiles of dirt or other loose, granular construction materials that could contribute sediment to waterways would be enclosed and covered. Erosion and sediment control measures, such as silt fences and straw wattles, to prevent sediment from entering storm drains and surface waters, would also be implemented during construction. Efforts would be made by the contractor to conduct the majority of land-disturbing work outside of the typical wet season and minimize the potential for large rain events to mobilize loose sediment during construction. Both construction and post-construction BMPs would be implemented for the proposed Project, as discussed in response X.a, including landscaping that would minimize the amount of irrigation runoff and promote surface infiltration and stormwater capture.

Operation of the proposed Project would result in reductions in impervious surfaces and an increase in landscape coverage and pervious surfaces. Therefore, the proposed Project would not substantially alter drainage patterns or storm water flows on the Project site and would not result in significant changes in absorption rates, drainage patterns, or the rate and amount of surface runoff. In addition, no alteration of a stream or river would be required during construction. During operation, disturbance of exposed soil would not occur because all activity would be on paved areas or on the waters of the bay. Therefore, impacts related to changes in the drainage pattern, including changes related to erosion and/or siltation, would be less than significant with mitigation incorporated.

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

**Less Than Significant.** See response X.a and X.b. Project construction activities may result in temporary increases in the rate or amount of local surface runoff (onsite) and temporary flooding. However, compliance with Section 401 permit and the BMPs contained in the SWPPP and District's JRMP would reduce the potential for flooding on- or off-site during construction. Existing drainage patterns would ultimately be improved by increasing the total area of pervious surfaces (landscaped areas would increase by 3,000 sq. ft.) to capture, retain and treat stormwater runoff compared to existing conditions. Given the increase in pervious surfaces, runoff rates would be anticipated to decrease compared to existing conditions. The NPDES CGP and JRMP aims to match post-construction runoff to pre-construction runoff for the 85th-percentile storm event. In addition, the SWQMP is required to include a description of all post-construction BMPs. Both construction and post-construction BMPs would be implemented for the proposed Project, as outlined in the District's JRMP, BMP Manual, and project-specific SWQMP. As a result, no substantial changes in drainage patterns would occur, and the proposed Project would not cause surface runoff to result in flooding on- or off-site. Impacts would be less than significant.

**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 Impact.** As noted in response X.c-ii, the proposed Project would not result in an increase in the volume of runoff water that would exceed the capacity of the existing or planned stormwater drainage system given the decrease in impervious surfaces and increase in landscaped areas. The proposed Project may require changes to existing on-site storm drains because existing buildings would be replaced; the new storm drains would be appropriately sized and able to carry stormwater during a rain event, as required by the District's JRMP, thereby preventing on-site drainage issues. Stormwater pollutant control BMPs would meet the District's JRMP and BMP Design Manual performance standards, which mandate that post-construction runoff rates match pre-construction runoff rates for the 85th-percentile storm event. BMPs would be implemented that would retain onsite the pollutants contained in the volume of stormwater runoff produced from a 24-hour, 85th percentile storm event. In addition, the District performs a regular inspection of catch basins with filters that are located within the Port's jurisdiction to evaluate the condition of the catch basin filter inserts. Inserts are cleaned and maintained or replaced, as required; catch basins are cleaned of all debris and sediment semiannually or more frequently, as required. The storm drain clarifier units that are located within the Port's jurisdiction are also inspected and cleaned regularly by the District's Environmental Protection Department and its contractors. The proposed Project is not expected to contribute additional sources of polluted runoff during operation because the type of on-site uses would be the same as under existing conditions. Implementation of the proposed Project would result in a less intensive development through the reduction of building area, dock system area, and pavement area within the Project site. With a reduction in building area, dock system area, and pavement area, it is anticipated that fewer pollutants would be generated on site when compared to current conditions. Moreover, the proposed Project's SWQMP and related BMPs would minimize the potential for pollutants to enter storm drains. Therefore, no impact would occur from construction or operation of the proposed Project.

**iv. Impede or redirect flood flows?**

**Less Than Significant.** Refer to responses X.a through X.c above. The proposed Project includes a reduction in impervious areas and an increase in landscape coverage and pervious surfaces. Therefore, absorption rates would be reduced and surface water runoff would not increase. In addition, because the proposed Project involves redevelopment of an existing marina, no new structures would be constructed in areas that were previously undeveloped. Therefore, the Project would not impede or redirect flood flows.

In addition, the Project site has the potential to be affected by sea level rise, which could change the flooding patterns and thus require that development be sited to minimize the risk to users and property from said flooding. A California judicial decision, *Ballona Wetland Foundation v. City of Los Angeles* (2011) 201 Cal App. 4<sup>th</sup> 455, holds that a lead agency is not required to analyze the impacts of sea level rise (SLR) on a project, because CEQA does not require an analysis of “impacts of the environment on a project.” However, the Project is within the California Coastal Zone and must be consistent with the California Coastal Act (CCA), which contains several policies that address the effects of SLR. As such, an analysis of the potential impacts of SLR on the proposed Project is required.

Below is a sampling of the Chapter 3 policies (a non-exhaustive list) that the proposed Project must be consistent with, and such consistency may be affected by SLR. For example, if SLR changes the flooding patterns or increases the flooding of the Tidelands, new development must be sited to minimize the risk to users and property from said flooding, and if that new development is not a coastal dependent use, development of a seawall or similar improvement to protect the users or property may not be available. CCA policies that are relevant to SLR include:

- 30210: In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.
- 30211: Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization . . .
- 30220: Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.
- 30234: Facilities serving the commercial fishing and recreational boating industries shall be protected and, where feasible, upgraded . . .
- 30235: Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply.
- 30236: Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.
- 30253: New development shall: (1) Minimize risks to life and property in areas of high geologic, flood, and fire hazard; (2) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs . . . (5) Where appropriate, protect special communities and neighborhoods which, because of their unique characteristics, are popular visitor destination points for recreational uses.

In addition, the California Coastal Commission adopted its Sea Level Rise Policy Guidance in 2015 and an update to the science in 2018. This guidance provides principles for addressing SLR in the coastal zone, an overview of the science behind SLR as well as a description of the potential consequences, and an outline of the steps for addressing SLR in PMPs or Coastal Development Permits. Based on the Coastal Commission guidance, the Project is evaluated against a low risk aversion sea level rise scenario and a medium-high risk aversion sea level rise scenario. An extreme high risk aversion scenario is not warranted for the project since it is not critical infrastructure, nor would damage result in significant public health or safety impacts.

It should be noted that the District is also developing guidance for future planning and development related to sea level rise. However, because this guidance has not been finalized, Project site elevation and projections were analyzed for the conditions in years 2030, ~~2070~~2060, and 2100. Table 17 displays a summary of this analysis. As shown, the Project site would remain sufficiently above both permanent and temporary sea level rise projections out to the 2100 time frame.

**Table 17. Sea Level Rise Elevation and Projections (feet)**

Year	Existing Tidal Datum <sup>1</sup>		Sea Level Rise Projection <sup>2</sup>		Project Elevation Relative to Projections – Permanent SLR <sup>3</sup>		Project Elevation Relative to Projections with Storm Surge– Temporary SLR <sup>4</sup>	
	Site Elevation above MSL	MHHW Elevation above MSL	Low Risk	Medium-High Risk	Low Risk	Medium-High Risk	Low Risk	Medium-High Risk
2030	12.0	2.8	0.6	0.9	8.6	8.3	6.2	5.9
<del>2070</del> <u>2060</u>	12.0	2.8	<u>2.0</u> <del>4.6</del>	<u>3.6</u> <del>2.7</del>	<u>7.2</u> <del>7.6</del>	<u>5.6</u> <del>6.5</del>	<u>4.8</u> <del>5.2</del>	<u>3.2</u> <del>4.4</del>
2100	12.0	2.8	3.6	7.0	5.6	2.2	3.2	-0.2

<sup>1</sup> Mean Higher High Water Elevation above MSL calculated based on the difference between mean higher high water (5.72 feet) and MSL (2.94 feet). Obtained from: <https://tidesandcurrents.noaa.gov/datums.html?id=9410170>

<sup>2</sup> Based on projections for San Diego. Obtained from:

[https://documents.coastal.ca.gov/assets/slr/guidance/2018/0\\_Full\\_2018AdoptedSLRGuidanceUpdate.pdf](https://documents.coastal.ca.gov/assets/slr/guidance/2018/0_Full_2018AdoptedSLRGuidanceUpdate.pdf)

<sup>3</sup> Based on the difference between site elevation, Mean Higher High Water Elevation above MSL, and sea level rise projections. For example, the lower end elevation for 2030 is calculated as follows:  $12.0 - 2.8 - 0.6 = 8.6$  feet.  ~~$22.0 - 2.8 - 0.6 = 18.6$  feet.~~

<sup>4</sup> Based on the addition of the 100-year (1% annual exceedance probability) surge events on top of the projected permanent SLR (relative to MHHW). For example, the low risk elevation for 2030 is calculated as follows:  $8.6 - 2.4 = 6.2$  feet.  ~~$18.6 - 2.4 = 16.2$  feet.~~ This assumes that future storm surges above MHHW are similar to historical surge.

Note that this table does not take into account the SLR between 2000 (baseline for SLR projects) and 2018 (existing levels used for calculations) change in sea level different in sea levels. The mean sea level trend is 2.17 millimeters/year (or 0.09 inches/year). Accounting for this change would reduce the project elevation relative to the water levels by approximately 0.1 feet. See: [https://tidesandcurrents.noaa.gov/sltrends/sltrends\\_station.shtml?id=9410170](https://tidesandcurrents.noaa.gov/sltrends/sltrends_station.shtml?id=9410170)

MSL = mean sea level; MHHW = mean higher high water.

The landside portion of the Project site is approximately 12 feet above mean sea level (msl) in the southern portion of the site and 15 feet above msl in the northern portion of the site. Assuming a ~~50~~40 year lease is initiated in 2020, the proposed lease for the Project site would expire in 2070. Considering sea level rise, at the end of the lease (~~2070~~2060) the low point of the Project site is projected to remain 3.2-4.8~~4.4-5.2~~ feet above the 100-year storm surge water level. Therefore, over the lease of the Project, the Project site is not expected to experience any permanent or temporary inundation.

Even when looking out to 2100, the site would remain 3.2 feet above a 2100 100-year storm surge if the low risk aversion sea level projections come to pass. If the medium-high risk aversion sea level projections materialize, the site could be inundated by up to 0.2 feet (2.4 inches) of water during a 100-year storm surge in the year 2100. Given the range of projections and the uncertainty in the 2100 time period, it is appropriate that no action be taken at this point in time to address sea level rise. A new analysis of sea level rise projections and impacts will be required in ~~2070~~2060 for an extension of the lease, which would allow sufficient time for action before 2100 sea levels materialize. Accordingly, impacts would be less than significant.

The waterside portion of the Project site consists of a floating marina. For the guide piles and gangways to accommodate the medium-high sea level rise projections and storm surge events over the lifetime of the lease (till ~~2070~~2060), they will need to allow for water elevations of up to 7.9 feet above today's mean sea level.<sup>14</sup> To accommodate the medium-high sea level rise projections and storm surge events out to 2100,

<sup>14</sup> The 7.9 feet above MSL is comprised of 2.8 feet to account for high tides (MHHW), 2.7 feet of sea level rise under the medium-high risk adverse scenario, and 2.4 feet of storm surge in a 1% annual exceedance probability storm.

the guide piles and gangways would need to accommodate water elevations of up to 12.2 feet above today's mean sea level. Therefore, the proposed Project would not result in impedance or redirection of flood flows. Impacts would be less than significant.

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

**Less Than Significant Impact.** According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the Project site is located in Zone AE, which is a special flood hazard area inundated by a 100-year flood (FEMA 2012).

The Project site is located on the San Diego Bay, which does present some risk for tsunami events. The State of California Tsunami Inundation Map for Emergency Planning indicates that the Project site is located within the tsunami inundation area for the San Diego Bay (DOC 2009). This inundation area considers potential tsunamis caused by both local and distant sources. For this reason, the Project site is considered at risk for tsunami-related flooding due to distant and local fault rupturing and/or subaqueous land sliding offshore of southern California and/or distant sources. Although the Project site is mapped as being within a tsunami inundation zone, the California Emergency Management Agency, California Geological Society, and the University of Southern California map preparers note that tsunamis are rare events and that, because of a lack of known occurrences in the historical record, their map does not contain information about the probability of a tsunami affecting any area within a specific period of time. According to the County of San Diego, tsunamis in the vicinity of San Diego have been infrequent and low in height. Four tsunamis have been reported since 1952, none more than 5 feet in height (County of San Diego 2011). The Project site sits at an elevation between 12 and 15 feet above msl. Although inundation from a tsunami is possible, it is unlikely; if it were to occur, damage would most likely be limited to ground-floor water damage.

The Project site would not be subject to inundation by seiche as this phenomenon is typically associated with land-locked bodies of water, none of which occur near the Project site.

The project site is a marina facility that does not store large quantities of pollutants that would risk release in the event of inundation. The proposed use would be similar to the existing use and would not increase risk of release of pollutants compared to existing conditions. As such, the proposed Project would not exacerbate flooding conditions in flood hazard, seiche, or tsunami zones that would risk release of pollutants due to inundation; thus, impacts would be less than significant and no mitigation measures would be required.

***e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

**Less than Significant with Mitigation Incorporated.** The project site is located within the San Diego RWQCB jurisdiction and must comply with the Water Quality Control Plan for the San Diego Basin (Basin Plan), which is the regional water quality control plan in which beneficial uses, water quality objectives, and implementation programs are established in order to maintain water quality. The Sustainable Groundwater Management Act (SGMA) requires all groundwater basins designated as medium or high priority to develop a Groundwater Sustainability Plan (GSP) to achieve sustainable management by 2040-2042 (California Department of Water Resources 2019). In San Diego County, the State has designated four of the county's basins as medium-priority and subject to SGMA: Borrego Valley, San Diego River Valley, San Luis Rey Valley and San Pasqual Valley (County of San Diego 2011). Groundwater at the site is directly tied to the San Diego Bay and thus the groundwater in the area is saline from saltwater intrusion. As such, the Project site is not considered within a medium or high priority groundwater basin and no GSP has been or will be prepared. The proposed Project would maintain the existing use of the Project site as a marina and recreational space.

In-water construction would include demolition of existing docks, removal of existing piles, and installation of new piles and docks. As discussed in Threshold X.a., to ensure in-water construction would not decrease water quality, thereby conflicting with the goals of the Basin Plan, **MM-HWQ-1** through **MM-HWQ-3** would be implemented during construction activities. The proposed Project would also be subject to the requirements of a Section 10 permit from USACE, as well as standard regulatory controls and conditions to protect water

quality as identified in the Regional Water Board's Construction General Permit and 401 Water Quality Certification Permit that would be implemented during construction activities.

Landside construction would involve soil disturbance from concrete removal, grading, repaving related to building demolition and construction; utility improvements; vegetation removal and planting; construction staging; and operation of heavy equipment for excavation and grading operations. Potential water quality impacts associated with these landside activities would be avoided by the implementation of BMPs included in the project's SWPPP as discussed in X.a. In addition, all development and redevelopment projects are required to complete and submit to the District a SWQMP accurately describing how the project will meet applicable stormwater requirements, in order to meet established water quality standards. The proposed Project would implement post-construction stormwater BMPs to avoid post-construction impacts to water quality.

Operation of the marina would generally include the use of materials that, if uncontained, could result in pollution, such as cleaners, organics, leaking oil, and other chemicals used for maintenance or cleaning. Water quality impacts can be avoided by using non-toxic materials and implementing practices to reduce opportunities for toxic products to contact surface water, such as required by the District's In-Water Hull Cleaning Ordinance. In addition, as discussed in Threshold X.a., it has been documented copper-based antifouling hull paints are a source of copper contamination in the San Diego Bay, which is listed on the State Resources Control Board 303(d) impaired water body list for copper along the shoreline at Harbor Island West Basin. However, boat activity is not anticipated to increase, and the project would comply with the District's In-Water Hull Cleaning Ordinance to reduce impacts to water quality associated with copper. Therefore, with the implementation of regulatory requirements for construction and post-construction BMPs, **MM-HWQ-1** through **MM-HWQ-3**, and compliance with District's In-Water Hull Cleaning Ordinance the proposed Project would not conflict with the goals and programs of the Basin Plan, and the impact would be less than significant.



## XI. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

The Project site is located on Harbor Island, which is a man-made peninsula with tidelands and submerged lands. Consequently, the Project site is under the District's jurisdiction. The District is charged with upholding the public trust doctrine. Public trust uses were initially limited to water-related commerce, navigation, and fishing. In more recent years, however, the California Supreme Court has found that the public trust embraces the right of the public to use the navigable waters of the state for "bathing, swimming, boating, and general recreational purposes." The District's PMP is the guiding land use document. The PMP provides official planning policies, consistent with the public trust doctrine, for the physical development of the tidelands and submerged lands conveyed and granted to the District.

The Project site is located within Planning District 2, Harbor Island/Lindbergh Field, of the certified PMP. The specific land and water use designations for the Project site include Commercial Recreation, Recreation Boat Berthing, Fueling Dock, and Sanitary Pump Station (District 2017a). Figure 13 shows the existing land and water use designations on and surrounding the Project site.

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.

Existing adjacent land uses to the Project site include the Hilton San Diego Airport/Harbor Island Hotel to the east; Tom Ham's Lighthouse Restaurant to the west; open water to the north; and Harbor Island Drive, Harbor Island Park, and North San Diego Bay to the south. Major circulation facilities in the area include North Harbor Drive, Rosecrans Street, and I-5.

### Analysis of Environmental Impacts

#### **a. Would the project physically divide an established community?**

**No Impact.** The proposed Project would redevelop an existing marina, including both waterside and landside infrastructure. As proposed, the Project would not expand the physical boundaries of the existing marina or develop areas outside of its current boundaries. Existing land and water use designations within the Project boundary consist of Commercial Recreation (landside) and Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Station (waterside). Adjacent surrounding land use designations are also related to Commercial Recreation (landside) and Recreational Boat Berthing (waterside). No established communities exist on the Project site or in the immediate Project area. Neither construction nor operation of the proposed Project would physically divide an established community on Harbor Island. No impacts would occur and no mitigation measures are required.

#### **b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?**

**Less Than Significant Impact.** The applicable land use plans governing the Project site are the certified PMP, including the PMP Precise Plan, and the California Coastal Act (CCA). The Project site is located

within the Planning District 2, Harbor Island/Lindbergh Field, of the District's certified PMP. The specific land and water use designations for the Project site include Commercial Recreation, Recreation Boat Berthing, Fueling Dock, and Sanitary Pump Station.

Commercial recreation uses include hotels, restaurants, the convention center, recreational vehicle parks, specialty shopping, pleasure craft marinas, water-dependent educational and recreational program facilities and activities, dock-and-dine facilities (i.e., public boat docks located in proximity to a restaurant or other retail use where boaters may tie up and disembark for a short period of time to dine, shop, or enjoy other recreational activities), and sportfishing. Recreational boat berthing uses include recreational craft storage, refueling, a boat brokerage storage area, sailing school docking, water taxi, excursion ferry and charter craft operations, guest docking, boat launching, sewage pump out, water craft rental, boat navigation corridors, breakwaters for recreational craft protection, navigation facilities, aids to navigation, floats, docks, piers, breakwaters, wave attenuation structures, seawalls, shoreline protection, and any other necessary or essential facilities for providing waterside docking refuge to recreational marine craft and commercial passenger vessels.

The proposed Project involves the repair, maintenance, and replacement of several elements comprising the HIWM. The proposed Project would not change the existing land and water uses identified in the PMP because the proposed Project is compatible with the Commercial Recreation, Recreation Boat Berthing, Fueling Dock, and Sanitary Pump Station land and water use designations. As such, the proposed Project would not conflict with the land and water use designations of the PMP. As detailed summarized below, the proposed Project would be consistent with the PMP, the California Eelgrass Mitigation Policy, and the CCA.

The proposed Project's landside features, including commercial buildings that support marine-related businesses and the marina, are consistent with the Commercial Recreation designation. The waterside portion of the Project would redevelop the existing dock and improve the general safety of the marina, maintaining consistency with the Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Station designations.

The Project is also consistent with the policies of Chapters 3 and 8 of the CCA. Table 18 includes a detailed list of the applicable CCA policies and analyzes how the Project is consistent with them. The following provides a brief summary of the proposed project's CCA consistency. (Refer to Section X, *Hydrology and Water Quality*, for a discussion of sea level rise and consistency with the CCA). The proposed Project would increase and improve public access to the waterfront by creating a public promenade and improving the public viewing deck. Implementation of the proposed Project would also result in less impervious surface area and less overwater shading which would lead to more landscaping and potentially more waterside habitat, respectively. None of the proposed Project related actions would impede coastal access, including public access to the waterfront. Implementation of the proposed Project would build upon the future provision of access along the waterfront on Harbor Island by connecting to the existing public promenade on Tom Ham's Lighthouse Restaurant and by providing waterfront access along the entire length of the waterfront on site. As such, the proposed Project would not conflict with the adopted PMP or CCA.

The proposed Project also requires the issuance of an appealable CDP in compliance with the CCA. Because the proposed Project is consistent with the goals and objectives of the PMP and the policies of Chapters 3 and 8 of the CCA, the proposed Project would not conflict with any applicable land use plan, policy, or regulation. In addition, subsequent issuance of an appealable CDP in compliance with the CCA would further ensure that the proposed Project would not conflict with any applicable land use plan, policy, or regulation. Impacts associated with the construction and operation of the proposed Project would be less than significant.

**Table 18. Land Use Consistency**

Applicable Plan, Policy, or Goal	Project Consistency
<b>Port Master Plan</b>	
<b>Port Master Plan:</b> The Port District's Port Master Plan provides the official planning policy for the physical development of the tidelands and submerged lands conveyed in trust to the District.	The underlying land and water use designations for the project site are Commercial Recreation (landsides), Recreational Boat Berthing (waterside), Fueling Dock (waterside), and Sanitary Pump Station (waterside) uses. The project is consistent with these land and water use designations because it would redevelop the existing marina into a new marina with <u>three more slightly less vessel slips than existing</u> and a smaller building. An increase in the operational capacity of the Harbor Island Marina would not occur.
<b>Port Master Plan Goal I:</b> Provide for the present use and enjoyment of the Bay and tidelands in such a way as to maintain options and opportunities for future use and enjoyment.	The project would continue to provide opportunities for use and enjoyment of the bay by updating and redesigning the marina and associated buildings and ensuring adequate public access is available through sufficient parking, a new public promenade, and redeveloping the existing viewing dock for public enjoyment. Therefore, the project is consistent with Goal I of the Port Master Plan.
<b>Port Master Plan Goal II:</b> The Port District, as trustee for the people of the State of California, will administer the tidelands so as to provide the greatest economic, social, and aesthetic benefits to present and future generations.	The project would allow for greater accessibility by being designed pursuant to the 2019 California Building Code, and the accessibility requirements therein. The project would provide social and economic benefits by improving an existing public viewing dock and constructing a new public promenade. Therefore, the project is consistent with Goal II of the Port Master Plan.
<b>Port Master Plan Goal IV.</b> The Port District, in recognition of the possibility that its actions may inadvertently tend to subsidize or enhance certain other activities, will emphasize the general welfare of State-wide considerations over more local ones and public benefits over private ones.  - Foster and encourage the development of commerce, navigation, fisheries and recreation by the expenditure of public moneys for the preservation of lands in their natural state, the reclamation of tidelands, the construction of facilities, and the promotion of its use.	The marina would continue to be used by recreational vessels and boaters. Overall, the project would improve an existing marina facility by bringing it up to modern standards. Therefore, the project is consistent with Goal IV of the Port Master Plan.
<b>Port Master Plan Goal V.</b> The Port District will take particular interest in and exercise extra caution in those uses or modifications of the bay and tidelands that constitute irreversible action or loss of control.  - Bay fills, dredging, and granting of long-term leases will be taken only when substantial public benefit is derived.	The project involves a <del>5040</del> -year lease to operate the proposed redeveloped marina facility. No dredging or net fill or fill is proposed within the bay. The project would result in a substantial public benefit by improving public access including access for disabled users and the overall safety of the marina by incorporating fire standpipes. Therefore, the project would be consistent with Port Master Plan Goal V.

Applicable Plan, Policy, or Goal	Project Consistency
<b>Port Master Plan Goal VII.</b> The Port District will remain sensitive to the needs, and cooperate with adjacent communities and other appropriate governmental agencies in bay and tidal development.	The project is consistent with the surrounding community uses and would not disproportionately affect surrounding jurisdictions. Therefore, the project would be consistent with Goal VII of the Port Master Plan.
<p><b>Port Master Plan Goal VIII.</b> The Port District will enhance and maintain the Bay and tidelands as an attractive physical and biological entity.</p> <ul style="list-style-type: none"> <li>- Each activity, development, and construction project should be designed to best facilitate its particular function, which function should be integrated with and related to the site and surroundings of the activity.</li> <li>- Establish guidelines and standards facilitating the retention and development of an aesthetically pleasing tideland environment free of noxious odors, excessive noise and hazards to the health and welfare of the people of California.</li> </ul>	The project involves improvements to an existing marina facility. The improvements will facilitate the function of the existing facility by providing improvements and greater access through incorporation of 2019 California Building Code requirements and the addition of firefighting standpipes. Implementation of the project, with the inclusion of appropriate mitigation measures, would not significantly affect any biological community, existing view corridors, conflict with the visual character of the community, result in excessive noise or odor, or cause hazards to the health and welfare of the people of California. Therefore, the project would be consistent with Goal VIII of the Port Master Plan.
<b>Port Master Plan Goal IX.</b> The Port District will <del>insure</del> <u>ensure</u> physical access to the Bay except as necessary to provide for safety and security, or to avoid interference with waterfront activities.	The project would improve physical access to the bay by providing a public promenade, redeveloping the viewing deck, and constructing to 2019 CBC standards. Therefore, the project would be consistent with Port Master Plan Goal IX.
<b>Port Master Plan Goal X.</b> The quality of water in San Diego Bay will be maintained at such a level as will permit human water contact activities.	Implementation of the project would not result in water quality impacts that would prevent human water contact activities. Therefore, the project would be consistent with Port Master Plan Goal X.
<b>Port Master Plan Goal XI.</b> The District will protect, preserve, and enhance natural resources, including natural plant and animal life in the Bay as a desirable amenity and ecological necessity, and a valuable and usable resource.	Project impacts to marine biological resources would be reduced to less than significant with the implementation of appropriate mitigation. Therefore, the project would be consistent with Goal XI of the Port Master Plan.
<b>Port Master Plan Precise Plan Text.</b> The project is located in Planning District 2, Harbor Island/ Lindbergh Field, Subarea 22 (West Harbor Island), which is delineated on Precise Plan Map Figure 9 in the Port Master Plan. The Port Master Plan land and water use designations in the project area are Commercial Recreation (landside), Recreational Boat Berthing (waterside), Fueling Dock (waterside), and Sanitary Pump Station (waterside). The Precise Plan concept text notes that Subarea 22 “has been completely developed with commercial recreational uses such as hotels, restaurants, marinas, and marine related commercial business.”	The project is consistent with the PMP Precise Plan text because it would update existing buildings with the same land uses. Specifically, the project would redevelop a marina facility and improve physical access to the Bayfront by developing a public promenade, redeveloping an existing viewing deck, and ensuring there is sufficient public parking for the facility. Therefore, the project would be consistent with the Port Master Plan Precise Plan text.
<b>California Eelgrass Mitigation Policy</b>	
<b>California Eelgrass Mitigation Policy.</b> The California Eelgrass Mitigation Policy offers specific guidelines and mitigation measures for activities that threaten eelgrass	Impacts to eelgrass would occur with the project. However, these impacts would be mitigated through creation of eelgrass habitat

Applicable Plan, Policy, or Goal	Project Consistency
vegetated habitats.	on the site and off site, as necessary, following the guidance in the California Eelgrass Mitigation Policy. No conflict would occur.
<b>California Coastal Act – Chapter 3</b>	
<b>30210 Access; recreational opportunities; posting:</b> In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.	The project would improve access and recreational opportunities consistent with public safety needs by providing access to the marina for users with disabilities and improving access and increasing safety for all users of the marina. The project is located on public tidelands and therefore, would not conflict with public rights and the rights of private property owners. Overall, it would provide additional and improved public access and would not encroach on private property outside of the project site.
<b>30211 Development not to interfere with access:</b> Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.	The project would enhance public access by providing accessibility enhancements, providing modern building and marina amenities, improving firefighting capabilities by include <del>30-33</del> standpipes, and generally enhancing operations at the facility. A public promenade and view deck would be compliant with 2019 CBC accessibility requirements to ensure enjoyment by the general public.
<b>30212 New development projects:</b> a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where: 1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources, 2) adequate access exists nearby, or 3) agriculture would be adversely affected. Dedicated accessway shall not be required to be opened to public use until a public agency or private association agrees to accept responsibility for maintenance and liability of the accessway.	The project would enhance public access to the shoreline as described above under Section 30211. The project would maintain existing access from the nearest public roadway to the shoreline.
<b>30212.5 Public facilities; distribution:</b> Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.	The project would mitigate against overuse and overcrowding of recreational marinas by making improvements to the existing marina, thereby extending its useful life. This would ensure that members of the public can continue to use the marina along with the other marina facilities within San Diego Bay.
<b>30213 Lower cost visitor and recreational facilities; encouragement and provision; overnight room rentals:</b> Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred.	The project would provide lower-cost visitor and recreational facilities by providing continued access to the marina, providing for smaller and thus lower cost boat slips, developing a new public promenade, and enhancing the existing public viewing deck <u>and designating one 35-foot slip as a free slip for non-profit use.</u> The project does not involve overnight room rentals.
<b>30214 Implementation of public access policies; legislative intent:</b>	The project would make improvements to the existing Harbor Island West Marina and

Applicable Plan, Policy, or Goal	Project Consistency
<p>a) The public access policies of this article shall be implemented in a manner that takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case including, but not limited to, the following:</p> <ol style="list-style-type: none"> <li>1) Topographic and geologic site characteristics.</li> <li>2) The capacity of the site to sustain use and at what level of intensity.</li> <li>3) The appropriateness of limiting public access to the right to pass and repass depending on such factors as the fragility of the natural resources in the area and the proximity of the access area to adjacent residential uses.</li> <li>4) The need to provide for the management of access areas so as to protect the privacy of adjacent property owners and to protect the aesthetic values of the area by providing for the collection of litter.</li> </ol> <p>b) It is the intent of the Legislature that the public access policies of this article be carried out in a reasonable manner that considers the equities and that balances the rights of the individual property owner with the public's constitutional right of access pursuant to Section 4 of Article X of the California Constitution. Nothing in this section or any amendment thereto shall be construed as a limitation on the rights guaranteed to the public under Section 4 of Article X of the California Constitution.</p> <p>c) In carrying out the public access policies of this article, the commission and any other responsible public agency shall consider and encourage the utilization of innovative access management techniques, including, but not limited to, agreements with private organizations which would minimize management costs and encourage the use of volunteer programs.</p>	<p>comply with public access policies of the Coastal Act and Port Master Plan. The project would continue to be regulated consistent with the District's Port Code and the Coastal Act.</p>
<p><b>30220 Protection of certain water-oriented activities:</b> Coastal areas suited for water-oriented recreational activities that cannot readily be provided at inland water areas shall be protected for such uses.</p>	<p>The project would protect water-oriented recreational activities by making improvements to the existing marina, thereby extending the useful life of one of the marinas within San Diego Bay.</p>
<p><b>30221 Oceanfront land; protection for recreational use and development:</b> Oceanfront land suitable for recreational use shall be protected for recreational use and development unless present and foreseeable future demand for public or commercial recreational activities that could be accommodated on the property is already adequately provided for in the area.</p>	<p>The project is for the redevelopment of a recreational use marina and therefore is consistent with this section.</p>
<p><b>30222 Private lands; priority of development purposes:</b> The use of private lands suitable for visitor-serving commercial recreational facilities designed to enhance public opportunities for coastal recreation shall have priority over private residential, general industrial, or general commercial development, but not over agriculture or coastal-dependent industry.</p>	<p>The project does not involve privately-owned lands; therefore, this section does not apply.</p>

Applicable Plan, Policy, or Goal	Project Consistency
<b>30222.5 Oceanfront lands; aquaculture facilities; priority:</b> Oceanfront land that is suitable for coastal dependent aquaculture shall be protected for that use, and proposals for aquaculture facilities located on those sites shall be given priority, except over other coastal dependent developments or uses.	The project site would not be suitable for aquaculture. The project is for the redevelopment of an existing coastal dependent marina. Therefore, the project is consistent with this section.
<b>30223 Upland areas:</b> Upland areas necessary to support coastal recreational uses shall be reserved for such uses, where feasible.	The project site does not include development of any upland areas.
<b>30224 Recreational boating use; encouragement; facilities:</b> Increased recreational boating use of coastal waters shall be encouraged, in accordance with this division, by developing dry storage areas, increasing public launching facilities, providing additional berthing space in existing harbors, limiting non-water-dependent land uses that congest access corridors and preclude boating support facilities, providing harbors of refuge, and by providing for new boating facilities in natural harbors, new protected water areas, and in areas dredged from dry land.	The project would encourage recreational boating use of coastal waters by making improvements to the existing marina, thereby extending the useful life of an existing marina facility within San Diego Bay. Although the project would <del>not</del> only increase the size or capacity of the marina <u>by three slips</u> , it would <u>also</u> increase the range of available boat slip sizes as well as improve accessibility and improve fire safety at the marina.
<b>30230 Marine resources; maintenance:</b> Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.	The project involves renovation of the existing marina. Impacts to eelgrass would occur with the project. However, the project would maintain and enhance marine resources through the implementation of appropriate mitigation, including the creation of eelgrass habitat on the site following the guidance in the California Eelgrass Mitigation Policy, as described in Section IV, <i>Biological Resources</i> . No dredging or <u>net</u> fill would occur within the bay.
<b>30231 Biological productivity; water quality:</b> The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.	The project would not result in impacts related to water quality or biological productivity that would affect marine organisms or human health. Project impacts to marine biological resources would be less than significant with the implementation of appropriate mitigation. In addition, the project would comply with all required stormwater and water quality regulations and would not alter natural streams, as described in Section X, <i>Hydrology and Water Quality</i> .
<b>30232 Oil and hazardous substance spills:</b> Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.	The project would protect against the spillage of crude oil, gas, petroleum products, or hazardous substances by maintain a fueling station and sanitary pump station that meet all state requirements. Compliance with applicable laws regulating fuel and oils/lubricants in use on the boats and towing vehicles would further protect against the spillage of crude oil, gas, petroleum products, or hazardous substances, as described in Section IX, <i>Hazards and Hazardous Materials</i> .



Applicable Plan, Policy, or Goal	Project Consistency
<p><b>30233 Diking, filling or dredging; continued movement of sediment and nutrients:</b></p> <p>(a) The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects, and shall be limited to the following:</p> <p>(1) New or expanded port, energy, and coastal-dependent industrial facilities, including commercial fishing facilities.</p> <p>(2) Maintaining existing, or restoring previously dredged, depths in existing navigational channels, turning basins, vessel berthing and mooring areas, and boat launching ramps.</p> <p>(3) In open coastal waters, other than wetlands, including streams, estuaries, and lakes, new or expanded boating facilities and the placement of structural pilings for public recreational piers that provide public access and recreational opportunities.</p> <p>(4) Incidental public service purposes, including but not limited to, burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines.</p> <p>(5) Mineral extraction, including sand for restoring beaches, except in environmentally sensitive areas.</p> <p>(6) Restoration purposes.</p> <p>(7) Nature study, aquaculture, or similar resource dependent activities.</p> <p>(b) Dredging and spoils disposal shall be planned and carried out to avoid significant disruption to marine and wildlife habitats and water circulation. Dredge spoils suitable for beach replenishment should be transported for these purposes to appropriate beaches or into suitable longshore current systems.</p> <p>(c) In addition to the other provisions of this section, diking, filling, or dredging in existing estuaries and wetlands shall maintain or enhance the functional capacity of the wetland or estuary. Any alteration of coastal wetlands identified by the Department of Fish and Game, including, but not limited to, the 19 coastal wetlands identified in its report entitled, "Acquisition Priorities for the Coastal Wetlands of California", shall be limited to very minor incidental public facilities, restorative measures, nature study, commercial fishing facilities in Bodega Bay, and development in already developed parts of south San Diego Bay, if otherwise in accordance with this division. For the purposes of this section, "commercial fishing facilities in Bodega Bay" means that not less than 80 percent of all boating facilities proposed to be developed or improved, where the improvement would create additional berths in Bodega Bay, shall be designed and used for commercial fishing activities.</p> <p>(d) Erosion control and flood control facilities constructed on watercourses can impede the movement of sediment and nutrients that would otherwise be carried by storm runoff into coastal waters. To facilitate the continued</p>	<p>The project involves renovation of the existing marina that would reduce the size of the building. There are no other feasible or less environmentally damaging alternatives as development of a larger facility would likely result in increased impacts, and appropriate mitigation would be required to minimize adverse environmental impacts related to implementation of the project. The project would also include BMP's, such as use of a silt curtain during in-water construction activities and mitigation measures such as implementation of soft-start pile driving techniques, to minimize disruption to marine and wildlife habitats and water circulation. The project does not involve <u>net fill or dredging</u>, including dredging within wetlands or estuaries or the construction of erosion or flood control facilities, as described in Section IV, <i>Biological Resources</i>.</p>

Applicable Plan, Policy, or Goal	Project Consistency
delivery of these sediments to the littoral zone, whenever feasible, the material removed from these facilities may be placed at appropriate points on the shoreline in accordance with other applicable provisions of this division, where feasible mitigation measures have been provided to minimize adverse environmental effects. Aspects that shall be considered before issuing a coastal development permit for these purposes are the method of placement, time of year of placement, and sensitivity of the placement area.	
<b>30234 Commercial fishing and recreational boating facilities:</b> Facilities serving the commercial fishing and recreational boating industries shall be protected and, where feasible, upgraded. Existing commercial fishing and recreational boating harbor space shall not be reduced unless the demand for those facilities no longer exists or adequate substitute space has been provided. Proposed recreational boating facilities shall, where feasible, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry.	The project would renovate the existing marina, thereby protecting and upgrading a facility that serves the recreational boating industry. The project would reduce the size of the <u>landside facility and increase by three slips the size of the waterside facility</u> to meet the anticipated future demand, but would not interfere with the needs of the commercial fishing industry.
<b>30235 Construction altering natural shoreline:</b> Revetments, breakwaters, groins, harbor channels, seawalls, cliff retaining walls, and other such construction that alters natural shoreline processes shall be permitted when required to serve coastal-dependent uses or to protect existing structures or public beaches in danger from erosion, and when designed to eliminate or mitigate adverse impacts on local shoreline sand supply. Existing marine structures causing water stagnation contributing to pollution problems and fishkills should be phased out or upgraded where feasible.	The project would not alter the natural shoreline.
<b>30236 Water supply and flood control:</b> Channelizations, dams, or other substantial alterations of rivers and streams shall incorporate the best mitigation measures feasible, and be limited to (1) necessary water supply projects, (2) flood control projects where no other method for protecting existing structures in the flood plain is feasible and where such protection is necessary for public safety or to protect existing development, or (3) developments where the primary function is the improvement of fish and wildlife habitat.	The project does not involve channelization, dams, or alteration of rivers and streams; therefore, this section does not apply.
<b>30240 Environmentally sensitive habitat areas; adjacent developments:</b> (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.	The project involves renovation of the existing marina. Impacts to eelgrass would occur with the project. However, the project would protect against any significant disruption of habitat values through the implementation of appropriate mitigation, including the creation of eelgrass habitat on the site following the guidance in the California Eelgrass Mitigation Policy, as described in Section IV, <i>Biological Resources</i> .

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<p><b>30241 Prime agricultural land; maintenance in agricultural production:</b> The maximum amount of prime agricultural land shall be maintained in agricultural production to assure the protection of the areas' agricultural economy, and conflicts shall be minimized between agricultural and urban land uses through all of the following:</p> <p>(a) By establishing stable boundaries separating urban and rural areas, including, where necessary, clearly defined buffer areas to minimize conflicts between agricultural and urban land uses.</p> <p>(b) By limiting conversions of agricultural lands around the periphery of urban areas to the lands where the viability of existing agricultural use is already severely limited by conflicts with urban uses or where the conversion of the lands would complete a logical and viable neighborhood and contribute to the establishment of a stable limit to urban development.</p> <p>(c) By permitting the conversion of agricultural land surrounded by urban uses where the conversion of the land would be consistent with Section 30250.</p> <p>(d) By developing available lands not suited for agriculture prior to the conversion of agricultural lands.</p> <p>(e) By assuring that public service and facility expansions and nonagricultural development do not impair agricultural viability, either through increased assessment costs or degraded air and water quality.</p> <p>(f) By assuring that all divisions of prime agricultural lands, except those conversions approved pursuant to subdivision (b), and all development adjacent to prime agricultural lands shall not diminish the productivity of such prime agricultural lands.</p>	<p>The project site is not located on agricultural land; therefore, this section does not apply.</p>
<p><b>30241.5 Agricultural land; determination of viability of uses; economic feasibility evaluation:</b> (a) If the viability of existing agricultural uses is an issue pursuant to subdivision (b) of Section 30241 as to any local coastal program or amendment to any certified local coastal program submitted for review and approval under this division, the determination of "viability" shall include, but not be limited to, consideration of an economic feasibility evaluation containing at least both of the following elements:</p> <p>(1) An analysis of the gross revenue from the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program.</p> <p>(2) An analysis of the operational expenses, excluding the cost of land, associated with the production of the agricultural products grown in the area for the five years immediately preceding the date of the filing of a proposed local coastal program or an amendment to any local coastal program.</p> <p>For purposes of this subdivision, "area" means a geographic area of sufficient size to provide an accurate evaluation of the economic feasibility of agricultural uses for those lands included in the local coastal program or in the proposed amendment to a certified local coastal program.</p>	<p>The project site is not located on agricultural land; therefore, this section does not apply.</p>

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(b) The economic feasibility evaluation required by subdivision (a) shall be submitted to the commission, by the local government, as part of its submittal of a local coastal program or an amendment to any local coastal program. If the local government determines that it does not have the staff with the necessary expertise to conduct the economic feasibility evaluation, the evaluation may be conducted under agreement with the local government by a consultant selected jointly by local government and the executive director of the commission.	
<b>30242 Lands suitable for agricultural use; conversion:</b> All other lands suitable for agricultural use shall not be converted to nonagricultural uses unless (1) continued or renewed agricultural use is not feasible, or (2) such conversion would preserve prime agricultural land or concentrate development consistent with Section 30250. Any such permitted conversion shall be compatible with continued agricultural use on surrounding lands.	The project site is not located on lands suitable for agricultural use; therefore, this section does not apply.
<b>30243 Productivity of soils and timberlands; conversions:</b> The long-term productivity of soils and timberlands shall be protected, and conversions of coastal commercial timberlands in units of commercial size to other uses or their division into units of noncommercial size shall be limited to providing for necessary timber processing and related facilities.	The project site is not located on agricultural land or timberlands; therefore, this section does not apply.
<b>30244 Archaeological or paleontological resources:</b> Where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required.	The project would not adversely impact archaeological or paleontological resources, as described in Sections V, <i>Cultural Resources</i> , and VII, <i>Geology and Soils</i> .
<b>30250 Location; existing developed area:</b> (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources. In addition, land divisions, other than leases for agricultural uses, outside existing developed areas shall be permitted only where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding parcels. (b) Where feasible, new hazardous industrial development shall be located away from existing developed areas. (c) Visitor-serving facilities that cannot feasibly be located in existing developed areas shall be located in existing isolated developments or at selected points of attraction for visitors.	The project involves renovation of the existing marina, a visitor-serving facility, in its current location. Adequate public services exist to support the project, as described in Section XV, <i>Public Services</i> . The project would not involve the development of new hazardous industrial uses.
<b>30251 Scenic and visual qualities:</b> The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural landforms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded	The project involves renovation of the existing marina. The project would protect the scenic and visual qualities of the site and surrounding area by ensuring that the renovations are consistent with the scale and character of the existing marina (about 1/3 smaller). In addition, the project would develop a new pedestrian promenade and enhance the existing public

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<p>areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.</p>	<p>viewing deck. Finally, the project would not alter natural landforms and would be professional designed as a smaller facility that the existing facility, ensuring the project would not result in a negative site aesthetic.</p>
<p><b>30252 Maintenance and enhancement of public access:</b> The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.</p>	<p>The project would enhance public access by providing accessibility on the proposed docks for users with disabilities, providing a pedestrian promenade, and redeveloping the existing public viewing deck. Since the project does not involve an increase in size <del>or and</del> <u>only a small three-slip increase in capacity</u> of the existing marina, the proposed parking would be sufficient to support the project.</p>
<p><b>30253 Minimization of adverse impacts:</b> New development shall do all of the following:</p> <ul style="list-style-type: none"> <li>(a) Minimize risks to life and property in areas of high geologic, flood, and fire hazard.</li> <li>(b) Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.</li> <li>(c) Be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.</li> <li>(d) Minimize energy consumption and vehicle miles traveled.</li> <li>(e) Where appropriate, protect special communities and neighborhoods that, because of their unique characteristics, are popular visitor destination points for recreational uses.</li> </ul>	<p>The project involves redevelopment of an existing marina facility with the same or reduced capacity and would not be considered a new development. However, the project would not increase risks to life or property due to geologic, flood, or fire hazards because it would not increase the size or capacity of the existing marina, and the project would not be subject to sea level rise during its lifetime, as described in Sections VII, <i>Geology and Soils</i>, VIII, <i>Greenhouse Gas Emissions</i>, and X, <i>Hydrology and Water Quality</i>. The project would be designed to be structurally sound and would not require the construction of protective devices that would alter natural landforms along bluffs and cliffs. Furthermore, the project would not violate any air quality standards of the SDAPCD. The project would minimize energy consumption by installing energy-efficient LED lighting for safety and operational purposes. Finally, the project will enhance the existing Harbor Island Marina West project site, a popular commercial recreation destination.</p>
<p><b>30254 Public works facilities:</b> New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new</p>	<p>The project does not involve new or expanded public works facilities, such as public facilities for water, wastewater, electrical, telephone, or public transportation. Furthermore, the project site is not located near State Highway Route 1. Therefore, this section does not apply.</p>

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development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.	
<b>30254.5 Terms or conditions on sewage treatment plant development; prohibition:</b> Notwithstanding any other provision of law, the commission may not impose any term or condition on the development of any sewage treatment plant which is applicable to any future development that the commission finds can be accommodated by that plant consistent with this division. Nothing in this section modifies the provisions and requirements of Sections 30254 and 30412.	The project does not involve the development of any sewage treatment plant; therefore, this section does not apply.
<b>30255 Priority of coastal-dependent developments:</b> Coastal-dependent developments shall have priority over other developments on or near the shoreline. Except as provided elsewhere in this division, coastal-dependent developments shall not be sited in a wetland. When appropriate, coastal-related developments should be accommodated within reasonable proximity to the coastal-dependent uses they support.	The project involves redevelopment of a coastal-dependent marina facility. The project would not be sited in a wetland.
<b>30260 Location or expansion:</b> Coastal-dependent industrial facilities shall be encouraged to locate or expand within existing sites and shall be permitted reasonable long-term growth where consistent with this division. However, where new or expanded coastal-dependent industrial facilities cannot feasibly be accommodated consistent with other policies of this division, they may nonetheless be permitted in accordance with this section and Sections 30261 and 30262 if (1) alternative locations are infeasible or more environmentally damaging; (2) to do otherwise would adversely affect the public welfare; and (3) adverse environmental effects are mitigated to the maximum extent feasible.	The project does not involve the development or expansion of coastal-dependent industrial facilities; therefore, this section does not apply.
<b>30261 Tanker facilities; use and design:</b> Multi-company use of existing and new tanker facilities shall be encouraged to the maximum extent feasible and legally permissible, except where to do so would result in increased tanker operations and associated onshore development incompatible with the land use and environmental goals for the area. New tanker terminals outside of existing terminal areas shall be situated as to avoid risk to environmentally sensitive areas and shall use a monobuoy system, unless an alternative type of system can be shown to be environmentally preferable for a specific site. Tanker facilities shall be designed to (1) minimize the total volume of oil spilled, (2) minimize the risk of collision from movement of other vessels, (3) have ready access to the most effective feasible containment and recovery equipment for oil spills, and (4) have onshore deballasting facilities to receive any fouled ballast water from tankers where operationally or legally required.	The project does not involve the use of existing or development of new tanker facilities; therefore, this section does not apply.

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<p><b>30262 Oil and gas development:</b> a) Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met:</p> <p>(1) The development is performed safely and consistent with the geologic conditions of the well site.</p> <p>(2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible, unless consolidation will have adverse environmental consequences and will not significantly reduce the number of producing wells, support facilities, or sites required to produce the reservoir economically and with minimal environmental impacts.</p> <p>(3) Environmentally safe and feasible subsea completions are used when drilling platforms or islands would substantially degrade coastal visual qualities unless use of those structures will result in substantially less environmental risks.</p> <p>(4) Platforms or islands will not be sited where a substantial hazard to vessel traffic might result from the facility or related operations, as determined in consultation with the United States Coast Guard and the Army Corps of Engineers.</p> <p>(5) The development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence.</p> <p>(6) With respect to new facilities, all oilfield brines are reinjected into oil-producing zones unless the Division of Oil and Gas, Geothermal Resources of the Department of Conservation determines to do so would adversely affect production of the reservoirs and unless injection into other subsurface zones will reduce environmental risks. Exceptions to reinjections will be granted consistent with the Ocean Waters Discharge Plan of the State Water Resources Control Board and where adequate provision is made for the elimination of petroleum odors and water quality problems.</p> <p>(7)(A) All oil produced offshore California shall be transported onshore by pipeline only. The pipelines used to transport this oil shall utilize the best achievable technology to ensure maximum protection of public health and safety and of the integrity and productivity of terrestrial and marine ecosystems.</p> <p>(B) Once oil produced offshore California is onshore, it shall be transported to processing and refining facilities by pipeline.</p> <p>(C) The following guidelines shall be used when applying subparagraphs (A) and (B):</p> <p>(i) "Best achievable technology," means the technology that provides the greatest degree of protection taking into consideration both of the following:</p> <p>(I) Processes that are being developed, or could feasibly be developed, anywhere in the world, given overall reasonable expenditures on research and development.</p> <p>(II) Processes that are currently in use anywhere in the world. This clause is not intended to create any conflicting</p>	<p>The project does not involve the development of oil or gas; therefore, this section does not apply.</p>



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<p>or duplicative regulation of pipelines, including those governing the transportation of oil produced from onshore reserves.</p> <p>(ii) "Oil" refers to crude oil before it is refined into products, including gasoline, bunker fuel, lubricants, and asphalt. Crude oil that is upgraded in quality through residue reduction or other means shall be transported as provided in subparagraphs (A) and (B).</p> <p>(iii) Subparagraphs (A) and (B) shall apply only to new or expanded oil extraction operations. "New extraction operations" means production of offshore oil from leases that did not exist or had never produced oil, as of January 1, 2003, or from platforms, drilling island, subsea completions, or onshore drilling sites, that did not exist as of January 1, 2003. "Expanded oil extraction" means an increase in the geographic extent of existing leases or units, including lease boundary adjustments, or an increase in the number of well heads, on or after January 1, 2003.</p> <p>(iv) For new or expanded oil extraction operations subject to clause (iii), if the crude oil is so highly viscous that pipelining is determined to be an infeasible mode of transportation, or where there is no feasible access to a pipeline, shipment of crude oil may be permitted over land by other modes of transportation, including trains or trucks, which meet all applicable rules and regulations, excluding any waterborne mode of transport.</p> <p>(8) If a state of emergency is declared by the Governor for an emergency that disrupts the transportation of oil by pipeline, oil may be transported by a waterborne vessel, if authorized by permit, in the same manner as required by emergency permits that are issued pursuant to Section 30624.</p> <p>(9) In addition to all other measures that will maximize the protection of marine habitat and environmental quality, when an offshore well is abandoned, the best achievable technology shall be used.</p> <p>b) Where appropriate, monitoring programs to record land surface and near-shore ocean floor movements shall be initiated in locations of new large-scale fluid extraction on land or near shore before operations begin and shall continue until surface conditions have stabilized. Costs of monitoring and mitigation programs shall be borne by liquid and gas extraction operators.</p> <p>c) Nothing in this section shall affect the activities of any state agency that is responsible for regulating the extraction, production, or transport of oil and gas.</p>	
<p><b>30263 Refineries or petrochemical facilities:</b> (a) New or expanded refineries or petrochemical facilities not otherwise consistent with the provisions of this division shall be permitted if (1) alternative locations are not feasible or are more environmentally damaging; (2) adverse environmental effects are mitigated to the maximum extent feasible; (3) it is found that not permitting such development would adversely affect the public welfare; (4) the facility is not located in a highly scenic or</p>	<p>The project does not involve the development of new or expanded refineries or petrochemical facilities; therefore, this section does not apply.</p>

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<p>seismically hazardous area, on any of the Channel Islands, or within or contiguous to environmentally sensitive areas; and (5) the facility is sited so as to provide a sufficient buffer area to minimize adverse impacts on surrounding property.</p> <p>(b) New or expanded refineries or petrochemical facilities shall minimize the need for once-through cooling by using air cooling to the maximum extent feasible and by using treated waste waters from in-plant processes where feasible.</p>	
<p><b>30264 Thermal electric generating plants:</b> Notwithstanding any other provision of this division, except subdivisions (b) and (c) of Section 30413, new or expanded thermal electric generating plants may be constructed in the coastal zone if the proposed coastal site has been determined by the State Energy Resources Conservation and Development Commission to have greater relative merit pursuant to the provisions of Section 25516.1 than available alternative sites and related facilities for an applicant's service area which have been determined to be acceptable pursuant to the provisions of Section 25516.</p>	<p>The project does not involve the construction of new or expanded thermal electric generating plants; therefore, this section does not apply.</p>
<b>California Coastal Act – Chapter 8</b>	
<p><b>30703 Protection of commercial fishing harbor space:</b> The California commercial fishing industry is important to the State of California; therefore, ports shall not eliminate or reduce existing commercial fishing harbor space, unless the demand for commercial fishing facilities no longer exists or adequate alternative space has been provided. Proposed recreational boating facilities within port areas shall, to the extent it is feasible to do so, be designed and located in such a fashion as not to interfere with the needs of the commercial fishing industry.</p>	<p>The project would not eliminate or reduce existing commercial fishing harbor space. The project would redevelop an existing marina with a smaller marina. The project would not interfere with the needs of the commercial fishing industry.</p>
<p><b>30705 Diking, filling or dredging water areas:</b> (a) Water areas may be diked, filled, or dredged when consistent with a certified port master plan only for the following:</p> <ol style="list-style-type: none"> <li>(1) Such construction, deepening, widening, lengthening, or maintenance of ship channel approaches, ship channels, turning basins, berthing areas, and facilities as are required for the safety and the accommodation of commerce and vessels to be served by port facilities.</li> <li>(2) New or expanded facilities or waterfront land for port-related facilities.</li> <li>(3) New or expanded commercial fishing facilities or recreational boating facilities.</li> <li>(4) Incidental public service purposes, including, but not limited to, burying cables or pipes or inspection of piers and maintenance of existing intake and outfall lines.</li> <li>(5) Mineral extraction, including sand for restoring beaches, except in biologically sensitive areas.</li> <li>(6) Restoration purposes or creation of new habitat areas.</li> <li>(7) Nature study, mariculture, or similar resource-dependent activities.</li> <li>(8) Minor fill for improving shoreline appearance or public access to the water.</li> </ol>	<p>The project would redevelop an existing marina <del>with a smaller marina to support recreational boating</del>. No dredging would be required within the bay, but the project would have in-water construction in the form of new docks and <del>up to 155237</del> new piles. <u>Replacement of old piles with new piles for this recreational boating facility would have zero net fill impacts.</u> The project uses are consistent with the certified PMP. The project is a coastal-dependent marina facility that provides public access and recreational opportunities and serves the recreational boating and commercial recreation industries. The project would also include BMP's, such as use of a silt curtain during in-water construction activities and mitigation such as implementation of soft-start pile driving techniques, to minimize disruption to fish and bird habitats, eel grass, and water quality.</p>

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<p>(b) The design and location of new or expanded facilities shall, to the extent practicable, take advantage of existing water depths, water circulation, siltation patterns, and means available to reduce controllable sedimentation so as to diminish the need for future dredging.</p> <p>(c) Dredging shall be planned, scheduled, and carried out to minimize disruption to fish and bird breeding and migrations, marine habitats, and water circulation. Bottom sediments or sediment elutriate shall be analyzed for toxicants prior to dredging or mining, and where water quality standards are met, dredge spoils may be deposited in open coastal water sites designated to minimize potential adverse impacts on marine organisms, or in confined coastal waters designated as fill sites by the master plan where such spoil can be isolated and contained, or in fill basins on upland sites. Dredge material shall not be transported from coastal waters into estuarine or fresh water areas for disposal.</p> <p>(d) For water areas to be diked, filled, or dredged, the commission shall balance and consider socioeconomic and environmental factors.</p>	
<p><b>30706 Fill:</b> In addition to the other provisions of this chapter, the policies contained in this section shall govern filling seaward of the mean high tide line within the jurisdiction of ports:</p> <p>(a) The water area to be filled shall be the minimum necessary to achieve the purpose of the fill.</p> <p>(b) The nature, location, and extent of any fill, including the disposal of dredge spoils within an area designated for fill, shall minimize harmful effects to coastal resources, such as water quality, fish or wildlife resources, recreational resources, or sand transport systems, and shall minimize reductions of the volume, surface area, or circulation of water.</p> <p>(c) The fill is constructed in accordance with sound safety standards which will afford reasonable protection to persons and property against the hazards of unstable geologic or soil conditions or of flood or storm waters.</p> <p>(d) The fill is consistent with navigational safety.</p>	<p>The project does not involve filling seaward of the mean high tide line; therefore, this section does not apply.</p>
<p><b>30707 Tanker terminals:</b> New or expanded tanker terminals shall be designed and constructed to do all of the following:</p> <p>(a) Minimize the total volume of oil spilled.</p> <p>(b) Minimize the risk of collision from movement of other vessels.</p> <p>(c) Have ready access to the most effective feasible oil spill containment and recovery equipment.</p> <p>(d) Have onshore deballasting facilities to receive any fouled ballast water from tankers where operationally or legally required.</p>	<p>The project does not involve the development of new or expanded tanker terminals; therefore, this section does not apply.</p>
<p><b>30708 Location, design and construction of port-related developments:</b> All port-related developments shall be located, designed, and constructed so as to:</p> <p>(a) Minimize substantial adverse environmental impacts.</p> <p>(b) Minimize potential traffic conflicts between vessels.</p>	<p>The project involves renovation of the existing marina, a port-related development that supports recreational uses consistent with the public trust. The project would include appropriate mitigation to minimize adverse</p>

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<p>(c) Give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities.</p> <p>(d) Provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible.</p> <p>(e) Encourage rail service to port areas and multi-company use of facilities.</p>	<p>environmental impacts related to implementation of the project. The project would also enhance pedestrian access by developing a public promenade and enhance firefighting capabilities by installing <del>30</del><u>33</u> standpipes. No increase in potential traffic conflicts between vessels would occur.</p>

## XII. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

The proposed Project is not located in an area where mineral resources are known to exist and is also not in an area designated by the State of California or the PMP as a minerals resource zone.

### Analysis of Environmental Impacts

**a. *Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?***

**No Impact.** No commercial mining operations currently exist on the Project site or within the San Diego Bay. The site does not contain aggregate resources and is not located in a mineral resource zone that contains important resources, as designated by the California Department of Conservation Division of Mines and Geology. The City identifies the Project site as Mineral Resource Zone 1 (MRZ-1) which indicates that no known mineral deposits are present and the likelihood of their presence is low (City of San Diego 2008). In addition, there are no designated plans for mineral resource extraction nor has there been any important mineral resources identified by the PMP. As such, the proposed Project would not result in a loss of availability of a known mineral resource or locally-important mineral resource recovery sites. No impact would occur and no mitigation measures are required.

**b. *Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?***

**No Impact.** Refer to response XII.a above.

### XIII. Noise

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### Environmental Setting

Project-specific noise calculations were conducted (Appendix F), which were used, along with additional relevant information, in this section. The District has not adopted noise standards or thresholds. Therefore, as is customary for the District, this analysis relies on the City of San Diego noise standards to determine the proposed Project's potential noise impacts. To control transportation-related noise sources such as arterial roads, freeways, airports, and railroads, the City of San Diego has established noise compatibility guidelines in the General Plan Noise Element for all land use categories.

In addition, the City of San Diego Municipal Code Section 59.5.0404 states that it "shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level ( $L_{eq}$ ) greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m." The City of San Diego does not identify any maximum noise criteria to control single-event noise level impacts, such as those associated with pile driving activities.

The City of San Diego Significance Determination Thresholds states: "Temporary construction noise which exceeds 75 dB (A)  $L_{eq}$  at a sensitive receptor would be considered significant. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75-decibels (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m.". The City's construction noise standard is applied to all sensitive receptors. According to the City's Land Use-Noise Compatibility Guidelines, noise sensitive land uses include residential uses, hospitals, nursing facilities, intermediate care facilities, child educational facilities, libraries, museums, places of worship, child care facilities, and certain types of passive recreational parks and open space.

The closest existing noise sensitive receivers in the vicinity of the HIWM include Harbor Island Park, located on the south side of Harbor Island Drive, approximately 400 feet southeast of the marina; Spanish Landing Park, located on the south side of North Harbor Drive, approximately 600 feet north the marina; and a residential community (military housing), located approximately 1,650 feet northwest of the marina. These receivers are shown in Figure 18 (Noise Sensitive Receptor Locations).





**Figure 18**  
**Noise-Sensitive Receptor Locations**  
**Harbor Island West Marina Redevelopment Project**





In addition, there is one hotel, the Hilton Hotel, located 50 feet east of the Project site. While this hotel use is not zoned residential or specifically identified as a noise sensitive land use according to the definition provided by the City, hotels are considered by the District to be transient housing that is a noise-sensitive land use during only the evening and nighttime hours between 7 p.m. and 7 a.m. when guests would be sleeping. Since Project construction would be conducted only between 7 a.m. and 7 p.m. per City of San Diego Municipal Code Section 21.04, the Hilton Hotel is not a noise-sensitive land use with regards to temporary construction noise. Therefore, the analysis included in this Initial Study as it relates to hotels is for informational and discussion purposes only. Other land uses in the vicinity include restaurants near the marina; however, restaurants are not considered noise sensitive by the District.

The primary existing noise sources in the Project area are traffic on Harbor Island Drive, North Harbor Drive, and other roadways; civilian and military aircraft associated with SDIA and Naval Air Station North Island; and activities at the Project site and other neighboring marinas.

As shown in Figure 19 (Noise Monitoring Locations), short-term (ST) measurements were obtained at four locations in the study area. These locations were selected to document the existing noise environment adjacent to the Project site and at nearby noise-sensitive receptors. The noise level measurements are summarized in Table 19. Each measurement was conducted over a period of approximately 15 to 20 minutes.

**Table 19. Short Term Noise Level Measurements**

Receiver Identifier	Start Time	Duration (Minutes)	Location Description <sup>1</sup>	Noise Level (dBA)		
				L <sub>eq</sub>	L <sub>max</sub>	L <sub>min</sub>
ST-1	1:38 p.m.	16	1895 Tattal Way. Community park at The Village on the NTC (Lincoln Military Housing). Picnic/barbeque area near center of park.	59.2	71.0	45.7
ST-2	12:24 p.m.	19	4300 North Harbor Drive. Spanish Landing Park West. Picnic area on south side of park.	63.4	75.9	53.4
ST-3	11:35 a.m.	17	1960 Harbor Island Drive. Hilton Hotel. Adjacent to outdoor pool/spa area.	56.7	69.4	48.2
ST-4	11:01 a.m.	20	3299 Tidelands Avenue. Harbor Island Park. Seating area near west end of park.	60.9	72.8	53.2

Source: Appendix F

<sup>1</sup> See Figure 19 for a map of the noise measurement locations and Appendix F for measurement location photos.

dBA = A-weighted decibel scale, which is weighted to approximate the frequency response of human hearing.

L<sub>eq</sub> = equivalent sound level, the average noise level during the measurement period

L<sub>max</sub> = The maximum noise level during the measurement period

L<sub>min</sub> = The minimum noise level during the measurement period

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**Figure 19**  
**Noise Monitoring Locations**  
**Harbor Island West Marina Redevelopment Project**



### **Analysis of Environmental Impacts**

- a. Would the project result in 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 applicable standards of other agencies?***

**Less Than Significant Impact.** Project construction would take place in two phases, each consisting of a number of overlapping tasks. Phase I would include all waterside work (i.e., the demolition of the existing dock system and the installation the new dock system) and some landside work (demolition and construction) at the west portion of the Project site. Phase II construction would consist of the remaining landside work (demolition and construction) at the east portion of the Project site as well as final landscaping of the entire property. Given the construction schedule for the proposed Project, noise analyses were conducted for each of the two phases using the periods that would have the highest noise levels because of overlapping tasks. Project construction would be conducted between the hours of 7 a.m. and 7 p.m. Monday through Friday.

Two types of short-term noise could occur during construction of the proposed Project, noise associated with construction traffic and noise associated with onsite construction equipment. Construction traffic noise is associated with construction workers who would commute to and from the site, and trucks that would transport equipment and materials on access roads. Onsite construction equipment noise is typically associated with demolition of the existing facilities (e.g., docks, parking lots, and buildings) and construction of the new facilities (e.g., dock system, parking lots, and buildings).

As identified in the Section XVII, *Transportation*, construction-related traffic activity attributed to material delivery and haul truck use is anticipated to generate up to 10 truck trips per day during peak construction periods. In addition, construction worker commute trips are anticipated to generate up to 111 trips per day. At a reference distance of 50 feet from the centerline of Harbor Island Drive, these vehicles would generate an average hourly noise level of approximately 49 dBA  $L_{eq}$  and a daily noise level of approximately 41 dB Community Noise Equivalent Level (CNEL) (Refer to Appendix F). This daily noise level is well below 65 dB CNEL, which is a compatibility guideline for sensitive land uses that is widely used by California municipalities, including within the Noise Element of the City of San Diego General Plan (City of San Diego 2008).

Onsite construction noise was analyzed using data and methodologies from FHWA's Roadway Construction Noise Model (RCNM), which predicts average noise levels ( $L_{eq}$ ) at nearby receptors by analyzing the type of equipment, usage factor, the distance from source to receptor, and the presence, or absence, of intervening shielding between source and receptor. As noted previously, the analyses focused on the worst-case (loudest) construction periods when the maximum number of equipment items would operate simultaneously due to overlapping construction tasks. For the pile driving activity included in Phase I construction, pile jetting would be utilized for 80 to 90 percent of the time and an impact pile hammer would be used for the remaining 10 to 20 percent of the time. To provide a conservative estimate, an 80/20 split (80 percent jetting, 20 percent impact hammer) was assumed in the analysis. Calculations of the Project construction equipment noise levels were completed, as detailed in Appendix F. The average construction traffic noise level of 49 dBA (described above) was also added to the results for each receiver. This is a conservative approach because most receptors will either not be exposed to all of the construction traffic noise (because vehicles will be split among different alternative routes) or the portion of the receptor most exposed to traffic noise will not be the same as the portion that is most exposed to noise from onsite construction activity. The combined construction noise levels are summarized in Table 20. As identified in Table 20, the predicted construction noise levels do not exceed the City of San Diego's 75 dBA  $L_{eq}$  12-hour construction noise level limit at the identified noise sensitive receptors.

**Table 20. Estimated Construction Noise Levels**

Location Description	Phase I Construction Noise Levels (12-Hour $L_{eq}$ , dBA) <sup>1</sup>	Phase II Construction Noise Levels (12-Hour $L_{eq}$ , dBA)	Construction Noise Limit (12-Hour $L_{eq}$ , dBA) <sup>2</sup>	Exceeds Threshold?
The Village on the Naval Training Center (Lincoln Military Housing)	59.2	52.8	75	No
Spanish Landing Park West	66.6	58.4	75	No
Hilton Hotel <sup>3</sup>	85.7	78.0	N/A	No
Harbor Island Park	69.7	63.6	75	No

Source: Appendix F

<sup>1</sup> Phase I construction includes pile driving activities as part of the waterside improvements. Noise levels presented in this table represent worst case scenario (i.e., pile driving closest to the receptor).

<sup>2</sup> Construction Noise Limit is a 12-hour Average Noise Level (12-hour  $L_{eq}$ ) per City of San Diego Municipal Code 59.5.0404 (Noise Ordinance) requirements for temporary construction noise.

<sup>3</sup> The District considers the Hilton Hotel as a sensitive receptor only during nighttime hours. Project construction would not occur during nighttime hours. Data for the Hilton Hotel has been included for informational purposes only.

dBA = A-weighted decibel scale, which is weighted to approximate the frequency response of human hearing.

$L_{eq}$  = equivalent sound level, the average noise level over a given period of time

All estimated construction noise levels include the contribution of construction traffic on nearby streets; this contribution is conservatively estimated as 49 dBA for each receiver.

Noise generated by construction activity was also compared against ambient noise levels at the identified sensitive receptors in order to evaluate potential temporary noise increases. As noted above, construction would generate up to 10 truck trips and 111 commuter trips per day. These vehicles would travel from the HIWM construction site on Harbor Island Drive and North Harbor Drive before continuing to I-5 or dispersing onto other roadways. Existing average daily traffic (ADTs) on Harbor Island Drive and North Harbor Drive range from 5,222 to nearly 50,000. Adding 10 heavy truck trips and 111 automobile trips per day would increase overall noise levels by 0.2 dB CNEL or less. Such a small increase would be imperceptible.

Predicted onsite construction noise levels (see Table 20) were compared with ambient noise levels (see Table 19) in order to calculate the anticipated temporary noise increases due to onsite construction equipment. Table 21 summarizes the results of this analysis.

As shown in Table 21, the identified receptors would experience a temporary increase in ambient noise levels during construction of the proposed Project. An increase of 3 dBA is considered to be barely perceptible, an increase of 5 dBA is considered readily perceptible, and an increase of 10 dBA is generally perceived as a doubling of loudness. The Lincoln Military Housing on NTC would experience a temporary 3.0 dBA increase over existing ambient noise levels during Phase I of construction and a 0.9 dBA increase during Phase II of construction. The Spanish Landing Park West would experience a 4.9 dBA increase from during Phase I of construction and a 1.2 dBA increase during Phase II of construction. The Harbor Island Park would experience a 9.3 dBA increase during Phase I of construction and a 4.6 dBA increase during Phase II of construction. However, noise at each of the sensitive receptors would be below the applicable construction standard. The worst-case noise increases would be limited to the noisiest (i.e., closest) periods of Phase I construction only and would cease as soon as pile driving activities stop.

**Table 21. Estimated Temporary Noise Increases Due to Project Construction**

Location Description	Existing Ambient Noise Level (dBA, L <sub>eq</sub> )	Phase I Construction Noise Levels			Phase II Construction Noise Levels		
		Project <sup>1</sup> (dBA L <sub>eq</sub> )	Project + Ambient (dBA L <sub>eq</sub> )	Change (dBA) <sup>2</sup>	Project (dBA L <sub>eq</sub> )	Project + Ambient (dBA L <sub>eq</sub> )	Change (dBA) <sup>2</sup>
The Village on the Naval Training Center (Lincoln Military Housing)	59.2	59.2	62.2	3.0	52.8	60.1	0.9
Spanish Landing Park West	63.4	66.6	68.3	4.9	58.4	64.6	1.2
Hilton Hotel <sup>3</sup>	56.7	85.7	85.7	29.0	78.0	78.0	21.3
Harbor Island Park	60.9	69.7	70.2	9.3	63.6	65.5	4.6

Source: Appendix F

<sup>1</sup> Phase I construction includes pile driving activities as part of the waterside improvements. Noise levels presented in this table represent worst case scenario (e.g., pile driving closest to the receptor).

<sup>2</sup> This is the change between existing ambient noise levels and project + ambient noise levels.

<sup>3</sup> The District considers the Hilton Hotel as a sensitive receptor only during nighttime hours. Project construction would not occur during nighttime hours. Data for the Hilton Hotel has been included for informational purposes only.

dBA = A-weighted decibel scale, which is weighted to approximate the frequency response of human hearing.

L<sub>eq</sub> = equivalent sound level, the average noise level over a given period of time



Due to the proximity of the Hilton Hotel, project construction activities could generate temporary noise increases in the range of 20 to 30 dBA at locations facing the project site. While this level of noise would temporarily dominate the noise environment and could cause a short-term nuisance at the hotel, it would not occur during the nighttime hours when the District considers hotels to be sensitive. In addition, the worst-case noise increases would only occur when construction is closest to the hotel. Levels would decrease rapidly with distance from the hotel (at a rate of approximately 6 dB for every doubling of distance) as construction moves to other portions of the project site. As a result, there would be no significant construction noise impact at the hotel.

In summary, noise from temporary construction activities, including construction-related traffic, would not exceed local noise standards. There would be no substantial temporary noise increases at nearby noise-sensitive land uses and no construction activity would increase ambient noise levels above the City of San Diego's construction noise standard of 75 dBA 12-hour Leq. Therefore, temporary noise impacts would be less than significant. No mitigation measures are required.

Noise associated with operation of the existing HIWM includes engine noise from haul vehicles and boats, as well as noise from loading and unloading activities. The proposed Project would replace existing facilities with similar facilities, ~~but on a similar smaller scale,~~ and would retain the existing function of the marina. General operations of the HIWM would not change ~~with implementation of the proposed Project. However, because the proposed Project would slightly reduce the number of boat slips and the main users of the landside marina facilities are from the marina it is expected that sources of noise (vessels, cars) would be the same or less than the existing condition.~~ As such, operation of the proposed Project after construction is anticipated to generate approximately the same ~~or less~~ ambient noise levels as ~~than~~ the existing development and would not cause a substantial increase in noise levels. Consequently, no noise impacts associated with Project operation are anticipated and no mitigation measures are required.

***b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?***

**Less Than Significant Impact.** Sensitive receptors for vibration include structures (especially older masonry structures), people (especially residents, the elderly, and sick), and vibration-sensitive equipment. The effects of ground-borne vibration include movement of the building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Human perception of vibration occurs at much lower levels than would be associated with potential building damage. People are generally less sensitive to groundborne vibration when they are outside or engaged in physical activity. Typically, groundborne vibration generated by man-made activities attenuates rapidly with distance from the source of the vibration. There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal, and is measured in inches per second (in/s). PPV can be used to assess potential vibration impacts to both buildings and people.

The California Department of Transportation (Caltrans) provides widely referenced vibration guidelines in its publication *Transportation and Construction-Induced Vibration Guidance Manual* (Caltrans 2013). The manual defines two different types of potential vibration impact: (1) building damage potential and (2) annoyance potential, as summarized in Tables 22 and 23, below.

**Table 22. Caltrans Vibration Building Damage Potential Threshold Criteria**

Structure and Condition	Maximum PPV (in/s)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: Caltrans 2013

Transient sources create a single isolated vibration event, such as blasting or drop balls.

Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV= peak particle velocity; the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second.

**Table 23. Caltrans Vibration Annoyance Potential Criteria**

Human Response	Maximum PPV (in/s)	
	Transient Sources	Continuous/Frequent Intermittent Sources
Barely perceptible	0.04	0.01
Distinctly perceptible	0.25	0.04
Strongly perceptible	0.90	0.10
Severe	2.00	0.40

Source: Caltrans 2013

Transient sources create a single isolated vibration event, such as blasting or drop balls.

Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

PPV= peak particle velocity; the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second.

The primary source of groundborne vibration occurring as part of the proposed Project would be associated with construction activity, particularly the use of heavy machinery and pile driving equipment. Based on data published by Caltrans, typical construction equipment (with exception of crack-and-seat operations and pile driving equipment) generate between 0.003 and 0.24 in/s PPV at 25 feet, and typical impact pile driving equipment produces 0.65 in/s PPV at 25 feet. Vibration levels from construction equipment attenuate as they radiate from the source.

For the consideration of potential human annoyance, vibration effects are typically only considered inside occupied buildings and not at outside areas such as residential yards or open space. As such, the District does not consider parks to be vibration sensitive. In addition, the District considers hotels to be vibration sensitive only during the evening and nighttime hours of 7 p.m. to 7 a.m. Because there would be no construction during these evening and nighttime hours, nearby hotels are not considered sensitive with regard to human annoyance for this analysis. Human response estimates for these land uses are provided for informational purposes only. The closest occupied vibration-sensitive land uses are the homes at The Village on the Naval Training Center.

For the purposes of assessing potential building damage, it is also appropriate to consider the vibration levels at the closest buildings to the Project site. The two closest buildings to the Project site are the Hilton Hotel to the east and the Tom Ham's Lighthouse restaurant to the west. Table 24 summarizes the estimated vibration levels at each of the closest receptors to the Project site.



**Table 24. Project Construction Vibration Levels at Nearby Receptors**

Location Description	Distance from construction source (Feet) <sup>1</sup>		Vibration PPV Level (in/sec) at Receptor Location		PPV Threshold for Potential Building Damage (in/sec) <sup>2</sup>	Exceeds Potential Damage Threshold?	Human Response
	Waterside Sources	Landside Sources <sup>2</sup>	Waterside Sources	Landside Sources			
The Village on the Naval Training Center (Lincoln Military Housing)	1,650	2,000	0.006	0.001	0.5	No	Below barely perceptible
Spanish Landing Park West	600	1,000	0.020	0.002	N/A <sup>3</sup>	No	Barely perceptible <sup>4</sup>
Hilton Hotel	50	25	0.303	0.089	0.5	No	Strongly perceptible <sup>4</sup>
Harbor Island Park	400	400	0.031	0.004	N/A <sup>3</sup>	No	Barely perceptible <sup>4</sup>
Tom Ham's Lighthouse Restaurant	300	270	0.042	0.006	0.5	No	Below barely perceptible <sup>4</sup>

Source: Appendix F

<sup>1</sup> All sources associated with project construction are continuous/frequent intermittent sources. Waterside construction includes pile driving activities. Landside construction sources include excavators, backhoes, rollers, compactors, and graders.

<sup>2</sup> Building vibration thresholds are dependent on the type of building as identified in Table 22 of this Initial Study.

<sup>3</sup> There are no buildings associated with this location, therefore the building vibration threshold does not apply.

<sup>4</sup> Human response reported for informational purposes only. The District does not consider these land uses (restaurant, hotel during daytime hours, and parks) to be sensitive receptors with regard to human annoyance from groundborne vibration. Project construction would not occur during nighttime hours.

PPV= peak particle velocity; the maximum instantaneous positive or negative peak amplitude of the vibration velocity, measured in inches per second.

As summarized in Table 24, construction activities associated with the proposed Project would not result in an exceedance of potential building damage vibration thresholds and would not result in building damage as a result of groundborne vibration. With the exception of one location (e.g., Hilton Hotel), groundborne vibration caused by construction activities associated with the proposed Project would be barely perceptible for visitors and workers in the area. Due to the proximity of the Hilton Hotel, limited pile driving activities associated with the waterside improvements could generate an estimated 0.303 PPV which would be above the “strongly perceptible” threshold of 0.10 PPV. While this level of vibration could cause a short-term nuisance at the hotel, it would not occur during the nighttime hours when the District considers hotels to be sensitive. In addition, the worst case vibration would only occur when pile driving is closest to the hotel and levels would drop below the “strongly perceptible” threshold at a distance of approximately 140 feet, and below the “distinctly perceptible” threshold at a distance of approximately 320 feet. Therefore, groundborne vibration generated by construction activities would be below applicable criteria for annoyance or building damage. Impacts would be less than significant and no mitigation measures would be required.

Mechanical equipment installed as a result of implementation of the proposed Project would produce some localized vibration that may be perceptible at nearby locations within the same building. However, there would be no major sources of vibration that would generate perceptible vibration at offsite locations. As such, vibration impacts associated with operation of the proposed Project would be less than significant and no mitigation measures are required.

***e. 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?***

**Less Than Significant Impact.** The nearest private use airport to Project site is NAS North Island, which is located approximately 0.9 mile southeast of the Project site. The Project site is located within the noise contours for NAS North Island, as identified by the Air Installation Compatible Use Zones (AICUZ) Study Update for NAS North Island and Naval Outlying Landing Field Imperial Beach (Onyx Group 2011). As identified in Figure 4-8 (Prospective Noise Contours) of the AICUZ Study Update, the Project site is located at the outer edge of the Prospective Noise Contours, with an estimated noise exposure of approximately 62 to 63 dB CNEL from NAS North Island.

The Project site is located within 2 miles of one major public air facility, SDIA. Airport Influence Area (AIA) boundaries around SDIA have been adopted by San Diego County Regional Airport Authority in the ALUCP for SDIA (Airport Land Use Commission, San Diego County Regional Airport Authority 2014). The Project site is located within the AIA. As identified in Exhibit 2-1 (Noise Contour Map) of the ALUCP, the Project site is located at the outer edge of the Forecast Noise Exposure areas, with an estimated noise exposure of approximately 60 to 62 dB CNEL from SDIA.

Adding together the worst-case noise levels (i.e., the noise levels at the high end of each estimated range) for NAS North Island and SDIA results in a total noise exposure of 66 dB CNEL. This is below the applicable noise compatibility standards of 75 dB CNEL for marina uses and 70 dB CNEL for the office, retail, and service land uses that are proposed at the Project site. Therefore, the construction and operation of the proposed Project would not expose people residing or working within the Project site to excessive airport noise levels. Impacts associated with this issue would be less than significant and no mitigation measures are required.

## XIV. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

HIWM is located in the City of San Diego within District jurisdiction. No residential uses exist within District jurisdiction, including on the Project site. The nearest residential uses to the Project site are located approximately 0.5 mile to the northwest and across the bay, in the community of Point Loma.

### Analysis of Environmental Impacts

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

**Less Than Significant Impact.** Typically, the growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent land use plans. Significant growth impacts could also occur if the proposed Project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. The proposed Project involves the repair, maintenance, and replacement of several elements comprising of the HIWM. Construction of the proposed Project would create approximately 51 short-term construction jobs during the proposed Project's 2-year construction period. It is anticipated that the demand for these short-term construction jobs would be met by the local work force and would not result in substantial population growth.

Operation of the proposed Project would not result in an increase in the local population as there would be a reduction in total building area and a negligible increase (three) in the number of boat slips compared to existing conditions. Therefore, no growth inducement during operation of the proposed Project would occur. Finally, infrastructure, including roads, sewers, water, and electricity already exist in and around the Project site. No extension or expansion of HIWM infrastructure or capacity is proposed that would indirectly induce population growth. The proposed Project would not result in substantial population growth in the area, either directly or indirectly. Impacts would be less than significant and no mitigation measures would be required.

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

**No Impact.** There are no residential uses associated with the site or its surroundings. Therefore, construction of the proposed Project would not directly or indirectly cause the displacement of housing or people. No impacts associated with housing would occur and no mitigation measures are required.

## XV. Public Services

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, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

The City of San Diego's Fire-Rescue Department (SDFRD) provides emergency and nonemergency fire, medical, and lifeguard services within the Project vicinity. In addition, the San Diego Harbor Police Department provides marine firefighting services. The closest fire station to the Project site is Fire Station 3 located at 725 West Kalmia Street, approximately 2.40 miles east of the Project site. Law enforcement in the Project vicinity is provided by the San Diego Harbor Police Department and the City of San Diego Police Department (SDPD). The San Diego Harbor Police Dock is the closest police facility to the Project site. Located at 3380 N Harbor Drive, it is approximately 0.95 mile northeast of the Project site.

The Project site is located within the San Diego Unified School District (SDUSD). The closest school to the Project site is the Baypoint Preschool, which is located 0.50 mile northwest of HIWM. The closest grade schools to the Project site are the Loma Portal Elementary School and Cabrillo Elementary School, which are located 1.10 miles northwest and west of HIWM, respectively. As identified in the Recreation section, recreational facilities in the vicinity of the Project site include Harbor Island Park, located across Harbor Island Drive, approximately 0.25 mile to the southeast. Nearby recreational facilities that are across the bay include Spanish Landing Park, located 0.4 mile to the north; NTC Park, located 0.6 mile to the north; and Shoreline Park, located 0.9 mile southwest of the Project site. The closest library is the Point Loma/Hervey Branch Public Library, located at 3701 Voltaire Street, approximately 1.40 miles northwest of the Project site. The nearest hospital is Paradise Valley Hospital, located approximately 2.60 miles southeast of the Project site.

### Analysis of Environmental Impacts

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, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

#### **a. Fire protection?**

**Less Than Significant Impact.** The proposed Project includes the repair, maintenance, and replacement of several elements comprising of the HIWM. An increase in the operational capacity of the HIWM would not occur. Furthermore, the proposed Project does not include a residential component or a significant new job source; thus, it would not contribute to a direct increase in population. It is anticipated that the proposed Project would use construction workers from the local labor force. Therefore, the proposed Project would not generate a significant demand for increased fire protection. Therefore, the proposed Project would not result in significant environmental impacts associated with construction of new or physically altered

governmental facilities in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts would be less than significant and no mitigation measures would be required.

***b. Police protection?***

**Less Than Significant Impact.** The proposed Project would redevelop the existing HIWM, including both waterside and landside infrastructure. Police protection services are already provided to the Project site. During construction, it is possible that police protection may be required, but any need would represent a short-term demand and would not require permanent increases in police protection services or affect response times in a manner that would require new or physically altered police protection facilities. Because of the low probability and short-term nature of potential police protection needs during construction, the proposed Project would result in less than significant impacts on police protection services.

The proposed Project's operation would not directly or indirectly expand existing operations or increase the number or size of buildings on site. Moreover, no one would reside on the Project site. Operations under the proposed Project would be similar to operations under existing conditions in terms of the need for police protection services. Therefore, the proposed Project would not result in increased demand that would require new or physically altered police protection facilities; impacts would be less than significant.

***c. Schools?***

**No Impact.** Schools within the Project vicinity include Loma Portal Elementary School and Cabrillo Elementary School, located 1.1 miles northwest and west of the site, respectively. In addition, the Baypoint Preschool is located 0.50 mile to the northwest. No school facilities are located within or immediately adjacent to the Project site that would be physically impacted. As discussed in response XIV (a), the proposed Project would not increase population. Jobs generated during construction and operation of the proposed Project would be drawn from the local workforce already served under existing school capacities. Therefore, the proposed Project would not increase demand for new schools. No impacts associated with this issue are anticipated to occur and no mitigation measures would be required.

***d. Parks?***

**Less Than Significant Impact.** Harbor Island Park is located across from the Project site and offers a view of bay activities, a shoreline path for pedestrians, a route for bikers, and restrooms. The next closest park is Spanish Landing Park, located 0.2 mile north of the Project site at 4300 North Harbor Drive. This park offers bike parking, bike paths, picnic tables, play equipment, public art, restrooms, a sand beach, and telephones.

The proposed Project would not result in adverse impacts on parks, specifically Harbor Island Park or Spanish Landing Park. Physical impacts on parks are usually associated with in-migration and population growth, which increase the demand for and use of parks. The proposed Project would have no effect on population growth as the proposed Project would not result in additional employees at the HIWM and in surrounding areas. Although construction workers would be present during construction, representing an increase in the typical number of people at the Project site, they would not be expected to use existing neighborhood or regional parks, or any other park facilities, to a degree that would constitute the need for new or altered park facilities. Therefore, construction and operation of the proposed Project would not result in increased demand that would require new or physically altered park facilities. Impacts would be less than significant and no mitigation measures would be required.

***e. Other public facilities?***

**No Impact.** No other public facilities (libraries, community centers, etc.) are located within or immediately adjacent to the Project site that would be physically impacted. As discussed in response XIV (a), the proposed Project would not increase population. Jobs generated during construction and operation of the proposed Project would be drawn from the local workforce already served by existing public facilities. Therefore, the proposed Project would not increase demand for new public facilities of this type. No impact associated with this issue would occur and no mitigation measures are required.

## XVI. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

Recreational facilities in the vicinity of the Project site include Harbor Island Park, located across Harbor Island Drive, approximately 0.25 mile southeast of the Project site. Other nearby recreational facilities include Spanish Landing Park, located 0.4 mile north of the Project site and across the Harbor Island West Basin; NTC Park, located 0.6 mile north of the Project site and across the Harbor Island West Basin; and Shoreline Park, located 0.9 mile southwest of the Project site.

Other public recreational facilities in the vicinity of the Project site include an existing approximately 1.4 mile public promenade that runs the length of the southern side of the entire Harbor Island peninsula. There are also sections of a public promenade on the north side of the peninsula; however, the connections are incomplete and require one to leave the promenade in places and reconnect further down the path.

### Analysis of Environmental Impacts

**a. *Would the project 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?***

**Less Than Significant Impact.** An increase in the use of existing parks and recreational facilities typically results from an increase in the number of housing units or residents in an area. The proposed Project would not result in an increase in local housing. During construction of the proposed Project approximately 51 construction workers would be employed, and up to 35 employees during Project operations. It is anticipated that the demand for 51 short-term construction jobs would be met by the local work force. Therefore, the temporary construction jobs are not anticipated to 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.

During the proposed Project's approximately 2 year construction period, the HIWM would remain operational and open to the public. Other public recreational facilities located outside of the Project construction area, such as restrooms and parking areas, would remain open and available for use during the Project construction period. As identified in Section 2, *Project Description*, a phased construction schedule is proposed to allow the HIWM to remain open to the public and businesses as well as to avoid displacing boaters from the marina during construction. It is anticipated that the existing docks would be demolished and rebuilt one dock at a time so that there is enough vacancy within the marina to accommodate marina users during construction. Therefore, it is anticipated that there would not be a temporary increase in use of other marina facilities in the area. Therefore, use of existing neighborhood, regional parks, or other recreational facilities would not increase as a result of Project construction such that substantial physical deterioration of these facilities would occur or be accelerated.

During the construction period, it is estimated that impact-type pile driving could occur intermittently during the Phase 1 Construction of dock and boat slips. Although recreationists who would normally use Harbor Island ~~Shelter Island~~ may use other parks outside of the noise impact area instead during this period, including park areas located along Harbor Drive that offer similar public recreational activities, it is not anticipated that this would result in substantial physical deterioration of other parks in the area. Thus, construction of the proposed Project would not increase the use of existing parks or recreational facilities such that substantial physical deterioration would occur or be accelerated.

Finally, the proposed Project would not involve the construction of housing or other amenities that would increase population. Also, no expansion or increase in the operational capacity of the HIWM is proposed. As such, there would be no increase in the use of neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated due to population increases associated with operation of the proposed Project. Impacts would be less than significant and no mitigation measures would be required.

***b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

**Less Than Significant Impact with Mitigation Incorporated.** The existing HIWM itself is a recreational facility. The proposed Project would include elements that would improve the recreational features of the facility for the use of the public. The proposed Project would improve the existing facility; however, no expansion of use of the existing marina facility is anticipated. While there are elements of the redevelopment of the HIWM that would encourage recreational uses (e.g., providing an upgraded public promenade and public viewing deck) in the area, the redevelopment and operation of the proposed Project would not necessitate an expansion of off-site recreational facilities. Physical effects from construction and operation of the proposed Project are discussed in this Initial Study. As discussed elsewhere in this Initial Study, impacts from the proposed Project would be less than significant with the exception of biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality. Mitigation measures have been identified for biological resources, geology and soils, hazards and hazardous materials, and hydrology and water quality, which would reduce Project related impacts to a less than significant level.



## XVII. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Would the project result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

Information about the environmental setting for transportation, traffic, and parking is summarized from the *Harbor Island West Marina Redevelopment Project – Technical Memorandum* prepared by Chen Ryan Associates in December 2018 (Appendix G).

The District has not adopted transportation/traffic standards or thresholds. Therefore, this analysis relies on the City of San Diego Traffic Impact Study Manual thresholds to determine the proposed Project's potential transportation/traffic impacts, as shown in Table 25 below.

**Table 25. City of San Diego Traffic Impact Study Manual Significance Thresholds**

Level of Service with Project <sup>1</sup>	Allowable Change Due to Project Impact					
	Freeways		Roadway Segments		Intersections	Ramp Metering
	V/C	Speed (mph)	V/C	Speed (mph)	Delay (seconds)	Delay (minutes)
E (or ramp meter delays above 15 minutes)	0.010	1.0	0.02	1.0	2.0	2.0
F (or ramp meter delays above 15 minutes)	0.005	0.5	0.01	0.5	1.0	1.0

Source: City of San Diego 2016a

<sup>1</sup> All LOS measurements are based upon Highway Capacity Manual procedures for peak hour conditions. However, V/C ratios for roadway segments are estimated on an ADT24-hour traffic volume basis (using Table 2 of the City's Traffic Impact Study Manual). The acceptable LOS for freeways, roadways, and intersections are generally D (C for undeveloped locations). For metered freeway ramps, LOS does not apply. However, ramp meter delays above 15 minutes are considered excessive

LOS = Level of service

ADT = Average daily traffic

V/C = Volume to capacity ratio

MPH = Mile per hour

The City of San Diego *Traffic Impact Study Manual* requires that the defined study area include all freeway segments, roadway segments, and intersections where the proposed Project would add 50 or more peak hour trips in either direction. Based on the estimated construction trip generation for the proposed Project,

four roadway segments and three intersections were included in the traffic study area. In accordance with the City of San Diego *Traffic Impact Study Manual*, the proposed Project is not anticipated to add 50 or more peak hour trips to any metered freeway ramps or segments; therefore, no metered ramps or freeway segments were analyzed. Table 26 provides the existing traffic volumes for study area roadway segments. Based on existing traffic volumes, the segment of North Harbor Drive between Harbor Island Drive and Winship Lane is currently operating at an unsatisfactory level of service (LOS), while Harbor Island Drive, the access road to the proposed Project, is operating at LOS A or B.

**Table 26. Existing Average Daily Traffic Volumes at Study Area Roadway Segments**

Roadway Segment	Buildout Capacity (LOS E) <sup>1</sup>	ADT	V/C	LOS
<b>North Harbor Drive</b>				
SDIA Terminal 2/Spanish Landing to Harbor Island Drive	50,000	28,826	0.577	C
Harbor Island Drive to Winship Lane	50,000	49,987	1.000	E
<b>Harbor Island Drive</b>				
North Harbor Drive to Harbor Island Drive Southern Terminus	40,000	10,862	0.272	A
Western Terminus to Harbor Island Drive	15,000	5,222	0.348	B

Source: Appendix G

<sup>1</sup> Capacities based on City of San Diego's Roadway Classification and LOS Table

ADT = Average daily traffic

V/C = Volume to capacity ratio

LOS = Level of Service

Table 27 shows existing study area intersection operations during the AM and PM peak hours. As indicated, no intersections operate at an unsatisfactory LOS during AM or PM peak hours.

**Table 27. Existing Average Daily Traffic Volumes at Study Area Intersections**

Intersection	AM Peak Hour		PM Peak Hour	
	Delay	LOS	Delay	LOS
Harbor Island Drive/Airport Terminal Road and North Harbor Drive	51.5	D	36.6	D
North Harbor Drive and Winship Lane	6.4	A	5.5	A
Harbor Island Drive (West)/Harbor Island Drive (East) and Harbor Island Drive	4.6	A	5.4	A

Source: Appendix G

<sup>1</sup> Average delay expressed in seconds per vehicle

LOS = Level of Service

Signalized

Delay	LOS
0.0 < 10.0	A
10.1 to 20.0	B
20.1 to 35.0	C
35.1 to 55.0	D
55.1 to 80.0	E
> 80.1	F

As presented in the analysis below, the proposed Project would generate less than 100 peak hour trips or 1,000 average daily trips (ADT) during the construction phase and would generate a net negative number of ADTs and peak hour trips during operation. As such, a traffic impact study would not be required per the City of San Diego's Traffic Impact Study Manual.

### **Analysis of Environmental Impacts**

***a. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

**Less Than Significant Impact.** Project construction would occur over a 24-month period with two total phases. During construction, demolition debris and materials for redevelopment of the site would be hauled to and from the project site. Peak construction-related traffic activity would occur during the partially overlapping grading and site preparation phases of construction. During this period, approximately 10 haul trucks and 37 construction workers would access the Project site on a daily basis from Harbor Island Drive. To be conservative, it was assumed that all construction workers would drive individual vehicles to the Project site and would arrive and depart during the AM and PM peak hours, respectively. The daily trip rate per employee was assumed to be 3 trips per employee to account for lunch breaks or off-site errands/meetings. The analysis also assumed that haul trucks would arrive and depart at even intervals throughout the 8-hour workday. Table 28 provides the trip generation during the peak of Project construction.

**Table 28. Project Construction Trip Generation**

Use	Units	Vehicle Conversion Rate/Passenger Car Equivalent Trips	Rate/ Trips Per Unit	Daily Trips	AM Peak Hour		PM Peak Hour	
					In	Out	In	Out
Construction Workers	37	1	3/Worker	111	37	0	0	37
Haul Trucks	10	3	2/Truck	60	3	3	3	3
<b>Total</b>				<b>171</b>	<b>40</b>	<b>3</b>	<b>3</b>	<b>40</b>

Source: Appendix G

As shown, Project construction is anticipated to generate approximately 171 daily trips, including 43 trips (40 in / 3 out) during the AM peak hour and 43 trips (3 in / 40 out) during the PM peak hour. These trips were then distributed and assigned to the roadway segments and intersections in the Project study area. The Project trip distribution patterns were developed based on existing travel patterns, the proposed Project's location in relation to nearby land uses, nearby residential density, and freeway access.

The proposed Project's impact on the study area transportation network under existing plus Project conditions was analyzed. Existing plus Project traffic volumes were derived by combining the existing traffic volumes and the Project's trip assignment volumes. The results of this analysis are provided in Table 29 for roadway segments and Table 30 for intersections.

**Table 29. Average Daily Traffic Volumes at Study Area Roadway Segments During Project Construction**

Roadway Segment	Buildout Capacity (LOS E) <sup>1</sup>	Existing Traffic Volumes			Existing + Project Construction Traffic Volumes			Change in V/C	Sig?
		ADT	V/C	LOS	ADT	V/C	LOS		
North Harbor Drive									
SDIA Terminal 2/Spanish Landing to Harbor Island Drive	50,000	28,862	0.577	C	28,843	0.577	C	0.000	N
Harbor Island Drive to Winship Lane	50,000	49,987	1.000	E	50,141	1.003	F	0.003	N
Harbor Island Drive									
North Harbor Drive to Harbor Island Drive Southern Terminus	40,000	10,862	0.272	A	11,033	0.276	A	0.004	N
Western Terminus to Harbor Island Drive	15,000	5,222	0.348	B	5,393	0.360	B	0.012	N

Source: Appendix G

<sup>1</sup> Capacities based on City of San Diego's Roadway Classification and LOS Table

ADT = Average daily traffic

V/C = Volume to capacity ratio

LOS = Level of Service

**Table 30. Average Daily Traffic Volumes at Study Area Intersections During Project Construction**

Intersection	Existing Delay AM/PM	Existing LOS AM/PM	AM Peak Hour		PM Peak Hour		Δ Delay AM/PM	S?
			Avg. Delay	LOS	Avg. Delay	LOS		
Harbor Island Drive/ Airport Terminal Road and North Harbor Drive	51.5/36.6	D/D	51.7	D	38.9	D	0.2/2.3	N
North Harbor Drive and Winship Lane	6.4/5.5	A/A	6.4	A	5.4	A	0.0/-0.1	N
Harbor Island Drive (West)/Harbor Island Drive (East) and Harbor Island Drive	4.6/5.4	A/A	4.6	A	5.4	A	0.0/0.0	N

As summarized in Table 29 above, all study area roadway segments would continue to operate at LOS D or better under existing plus Project conditions, except for the segment of North Harbor Drive between Harbor Island Drive and Winship Lane (LOS F). Based on the City of San Diego's Traffic Impact Criteria outlined above, construction traffic associated with the proposed Project would not increase the volume to capacity ratio (V/C ratio) by more than 0.01 for LOS F roadway segments. In addition, as shown in Table 30 above, all study area intersections would continue to operate at LOS D or better under existing plus Project conditions. Therefore, Project construction would not result in any direct impacts on study area roadway segments or intersections. It should be noted that, while the existing marina would remain operational, there would be a decrease in operational traffic to the site during construction because vessel slips would be taken out of operation on a phased schedule. Project construction would have no effect on other modes of transportation such as mass transit, pedestrian walkways, or bicycle paths because no such facilities would need to be modified or temporarily interrupted by the Project's construction. Impacts related to construction traffic would be less than significant.

Once the proposed Project is operational, the smaller building and ~~slightly fewer vessel slips~~ and negligible increase in slip number (increase of three) would lead to ~~no change or a small reduction~~ in the number of ADTs currently generated at the Project site as boaters are the main users of the marina facilities. As a result, traffic associated with the proposed Project's operational phase is anticipated to be ~~the same or less than~~ under existing traffic conditions. Therefore, no conflicts with local policies that measure the effectiveness of the circulation system would occur during Project operations because (1) access to the Project site would continue to be provided similar to existing conditions; (2) the proposed Project would not add a substantial number of ADTs or peak hour trips to the existing roadway network; (3) sufficient street infrastructure and facilities already exist to service the Project site; (4) no adverse changes would occur related to mass transit, pedestrian, and bicycle facilities; and (5) the proposed Project would add a public promenade along the north side of the Harbor Island peninsula to help contribute to pedestrian access to the Project site. Impacts would be less than significant and no mitigation measures would be required.

***b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?***

**Less Than Significant Impact.** The provisions of Section 15064.3 are not required to be applied statewide until July 1, 2020<sup>ix</sup>; therefore, this threshold does not apply to the proposed Project because public review occurred prior to this date. An analysis of the proposed project's transportation impacts is provided above in response XVII.a.

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

**No Impact.** The proposed Project would not change the design of local roads or result in incompatible uses. Additionally, the proposed Project would not change or expand the existing use of the Project site or introduce any incompatible uses. No impact would occur as a result of construction or operation of the proposed Project and no mitigation measures would be required.

***d. Would the project result in inadequate emergency access?***

**No Impact.** Existing access to the Project site is provided from Harbor Island Drive at the southern Project boundary. Construction-related traffic activity consists of material delivery and truck haul use, as well as construction worker commute trips. Although the proposed Project would generate traffic trips during construction, the amount of trips anticipated would not interfere with emergency access. As discussed under response XVII.a., construction traffic associated with the proposed Project would not result in any significant impacts on study area roadway segments or intersections. During construction, portions of the parking lot would be utilized for a staging and laydown area. However, ingress and egress from Harbor Island Drive would not be impeded. In addition, site-specific activities, including temporary construction activities, are reviewed and approved on a project-by-project basis by the District when development plans are submitted. The District ensures that emergency access is maintained during construction through its project review and approval process. Thus, emergency access would be maintained during construction of the proposed Project.

Operation of the proposed Project would not include any characteristics (e.g., permanent road closures, long-term blocking of road access) that would physically impair or otherwise interfere with emergency access. For these reasons, ingress and egress to Harbor Island Drive would not be hindered in any way by the proposed Project, and Project traffic generation would ~~decrease~~ remain approximately the same compared with the existing condition due to the reduction in total building area and negligible increase in the number of slips on the site compared to existing conditions. Therefore, no impacts would occur from construction or operation of the proposed Project and no mitigation measures would be required.

***e. Would the project result in inadequate parking capacity?***

**Less Than Significant Impact.** The District approved Tidelands Parking Guidelines for use throughout the District in January 2001 (District 2001). The Tidelands Parking Guidelines are intended to assist in the determining how many parking spaces should be provided to serve uses in each of the planning districts. As identified in Table 31, based on the suggested base unadjusted parking demand rates identified in the

Tidelands Parking Guidelines for Harbor Island, the proposed Project would need approximately 657 parking spaces.

**Table 31. Parking Demand Rates**

Use	Proposed Square Footage	Parking Factor <sup>1</sup>	Number of Spaces Required
Retail	8,125	4.7 spaces per 1,000 square feet of floor area	38 spaces
Office	4,270	2.8 spaces per 1,000 square feet of floor area	12 spaces
Marine Sales/ Services	950	3.9 spaces per 1,000 square feet of floor space	4 spaces
Marina	603	1 space per slip	603 spaces
<b>Total Parking Spaces Suggested</b>			<b>657 spaces</b>

<sup>1</sup> Parking factors based on Table 1 (Suggested Base Unadjusted Parking Demand Rates by District) in Tidelands Parking Guidelines, San Diego Unified Port District, January 2001.

Existing parking on the Project site consists of 351 parking spaces within an existing asphalt lot. Parking on site is designated parking and currently serves boaters accessing the marina facility, employees, and patrons of the businesses on site. Table 32 provides a summary of parking counts taken at HIWM since 2004.

**Table 32. Harbor Island West Marina Historical Annual Peak Parking Summary**

Year	Average Parking Occupancy	Total Parking Stall Inventory	% Parking Spaces Occupied	% Parking Spaces Unoccupied	Available Parking Stalls During Peak Period
2004	251	351	71.5%	28.5%	100
2005	207	351	59%	41%	144
2006	193	351	55%	45%	158
2007	210	351	59.8%	40.2%	141
2008	203	351	57.8%	42.2%	148
2009	199	351	56.7%	43.3%	152
2010	190	351	54.1%	45.9%	161
2011	171	351	48.7%	51.3%	180
2012	207	351	59%	41%	144
2013	187	351	53.3%	46.7%	164
2014	195	351	55.6%	44.4%	156
2015	215	351	61.3%	38.7%	136
2016	201	351	57.3%	42.7%	150
2017	218	351	62.1%	37.9%	133
2018 <sup>1</sup>	181	351	51.6%	48.4%	170
<b>Averages</b>	<b>202</b>	<b>351</b>	<b>57.5%</b>	<b>42.5%</b>	<b>149</b>

Source: Harbor Island West, 2018

<sup>1</sup>Date for 2018 goes through March 28, 2018.

As identified in Table 32 above, on average the Project site's existing uses utilize approximately 57.5 percent of the total parking inventory with an average of approximately 42.5 percent remaining available. As identified in Section 2, *Project Description*, the redevelopment of the Project site would increase the number of parking spaces from 351 to 380 parking spaces, an increase in 29 parking spaces from existing conditions.

The Tidelands Parking Guidelines specifically state that to use the guidelines correctly, it is important to understand the difference between the parking demand a potential development generates and the parking requirement that development of a project on a specific site might create. Factors that influence parking demand include land use type, transit accessibility, airport accessibility, and pedestrian orientation. Factors that influence parking requirements include displacement of existing parking, existing parking shortages, public bay access, and parking needs of the proposed Project. Table 33 provides a comparison for each of the factors that influence parking demand and factors that influence parking requirements and how it applies to the proposed Project.

**Table 33. Parking Demand and Parking Requirement Factors**

Factor	Factor Description	Applicability to the Proposed Project
<b>Parking Demand Influence Factors</b>		
<b>Price of Parking</b>	The Tidelands Parking Guidelines assume that new developments will charge for parking at the current market rate.	Based on preliminary site design, approximately <del>352</del> <u>368</u> parking spaces would be utilized for marina users while approximately <del>28-12</del> parking spaces would be open public parking. Therefore, no charges for parking are included.
<b>Land Use Type</b>	Demand for parking is very dependent on the types of uses or developments involved.	Current uses on the Project site include commercial office space, a restaurant, snack bar, deli, liquor store, clubroom, lockers/storage, laundry, maintenance facilities, and a chandlery. The proposed Project would redevelop the Project site with the same type of uses currently existing.
<b>Transit Accessibility</b>	Demand for parking is influenced by the availability of public transit in an area such as light rail, bus, or passenger train. Generally, the better the transit services, the less demand for parking.	There are no light rail or passenger services that currently serve the Project area. Two bus lines (Bus Line 923 and 992) currently service North Harbor Drive but do not service Harbor Island Drive. However, rideshare companies such as Uber and Lyft currently service the Project area.
<b>Airport Accessibility</b>	Locations with good access to Lindbergh Field are likely to experience a reduction in parking demand due to air travelers' use of shuttles, taxis, and public transit, rather than an individual automobile.	The proposed Project would be located within 1.0 mile of Lindbergh Field and is adjacent to or in close proximity to hotels (e.g., Hilton San Diego Airport/Harbor Island, Sheraton San Diego Hotel and Marina Bay Tower, Sheraton San Hotel & Marina) that offer shuttles and taxis.
<b>Pedestrian Orientation</b>	Areas with a strong pedestrian orientation tend to require less parking than suburban areas where motorists tend to drive their cars between destinations. In a pedestrian oriented area, motorists can visit several uses or sites without moving their car.	The Project site is located on the west side of Harbor Island. Properties within West Harbor Island are connected by a common sidewalk north of Harbor Island Drive and a pedestrian walkway south of Harbor Island Drive. The proposed Project would result in the redevelopment of Harbor Island West Marina and would allow for motorists to visit several uses in the area without moving their car.



Factor	Factor Description	Applicability to the Proposed Project
<b>Parking Requirement Influence Factors</b>		
<b>Displacement of Existing Parking</b>	Does the project site result in the displacement of existing parking?	No. The Project site currently has 351 parking spaces that are reserved for existing marina users. The proposed Project would include the addition of 29 parking spaces, resulting in a total of 380 parking spaces. No parking displacement would occur.
<b>Existing Parking Shortages</b>	Does the project area currently experience parking shortages?	No. As identified in Table 31, although the Project site is currently “under parked,” pursuant to the District’s Tideland Parking Guidelines (640 spaces are required), daily counts since 2004 indicate that the existing parking capacity (351 spaces) is rarely ever reached.
<b>Public Bay Access</b>	The availability of parking in District tidelands can influence the degree of bay access afforded by the public. Does the new development displace parking that is currently utilized by those seeking access to Bayfront recreational areas?	No. The Project site currently has 351 parking spaces for uses associated with the existing marina. There currently are no free parking spaces for those seeking access to Bayfront recreational areas. The proposed Project would increase the number of parking spaces to a total of 380 parking spaces of which HIW will dedicate approximately <del>28</del> <u>12</u> parking spaces for free public use. The proposed Project would add parking that could be utilized by those seeking access to Bayfront recreational areas.

Source: District, 2018

Although the Project site is currently under parked pursuant to the District’s Tideland Parking Guidelines, parking counts since 2004 indicate that parking capacity is rarely ever reached (HIW 2018). Moreover, the proposed Project would decrease the amount of current building space from approximately 23,000 square feet to 15,682 square feet while the number of slips would ~~decrease~~increase negligibly from 620 to ~~603~~623, ~~which could reduce the such that parking demand proportionately would remain approximately the same as the existing condition~~. As detailed in Table 32, under the existing and proposed conditions on site, adequate onsite parking needs would be maintained while not displacing existing parking, creating or impacting parking shortages, or decreasing public bay access. Therefore, a less than significant impact associated with parking would occur and no mitigation is required.

## 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:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### Environmental Setting

Recent legislation (Assembly Bill 52) amended CEQA to add another category of cultural resource: Tribal Cultural Resources. Tribal Cultural Resources are defined as “sites, features, places, and objects with cultural value to descendant communities or cultural landscapes; and sacred places including, but not limited to, Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines.” These resources must be listed in the NAHC’s Sacred Lands File, included in or eligible for the California Register of Historical Resources (CRHR), included in a local register of historical resources, or be determined significant by the CEQA lead agency. At present, no Native American tribes have requested consultation for environmental review projects under CEQA per AB 52 within the District’s jurisdiction.

### Analysis of Environmental Impacts

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), or***

**Less Than Significant Impact.** A records search was obtained from the SCIC for the proposed Project to determine if tribal cultural resources are present within the Project site. No tribal cultural resources that are listed in or eligible for listing in the CRHR were identified during the records search; however, tribal cultural resources are not typically recorded. The results of a Sacred Lands File Search, conducted by the Native American Heritage Commission for the Port Master Plan Update in 2017, indicated that no sacred lands have been previously reported in the project area. In addition, the Project site is part of Harbor Island, which was constructed in the early 1960s by hydraulically dredging, pumping, and depositing sand in the current configuration of Harbor Island. The hydraulically placed sands were placed up to the mean high tide line with fill soils imported and placed up to the existing ground surface with typically 10 to 12 feet of placed fill

comprising the near-surface soils of Harbor Island. The proposed Project site is also completely developed with an active marina facility. Therefore, the proposed project would not cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources and less than significant impacts would occur.

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

**No Impact.** Refer to response XVIII.a. No tribes have contacted the District to request notification of projects under AB 52; therefore, tribal consultation was not conducted, and no tribal cultural resources were identified as the result of an AB 52 consultation process. Therefore, there would be no impact associated with a tribal cultural resource determined by the lead agency pursuant to subdivision (c) of Public Resources Code Section 5024.1.

## XIX. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

Water service is currently provided to the Project site by the City of San Diego's Public Utilities Department (Water Branch). The City of San Diego relies heavily on imported water supplies from the Colorado River and State Water Project (approximately 85 to 90 percent of total water supply) through agreements with the San Diego County Water Authority (SDCWA). The SDCWA secures the San Diego region's water supply from the Metropolitan Water District of Southern California (MWD). Because of the City's heavy reliance on imported water, the convergence of critical water supply issues has far-reaching implications for the City that requires long range and proactive planning.

As a result, the City of San Diego has prepared the 2015 San Diego Urban Water Management Plan (UWMP) to identify the reliability of imported water supply during droughts, restrictions resulting from environmental regulations and state mandated water conservation, the quality of imported water that impacts local water recycling, groundwater, and water customers, and climate change impacts on local water demands, local water supply, and imported water.

The City of San Diego's UWMP looks at the City's historic and current water use projections and compares water supplies with demands over the next 25 years. The UWMP serves as a long range planning document for water supply and demand and provides an overview of the City's water supply and usage, recycled water and conservation programs. Tables 34, 35, and 36 provide a summary of the City of San Diego's existing and projected supply and demand for water.

**Table 34. City of San Diego Projected Water Demand and Supply in Normal Year**

	Demands and Supplies (AFY)				
	2020	2025	2030	2035	2040
Water Demand	200,984	242,038	264,840	273,748	273,408
<b>Water Supplies</b>					
Recycled Water (City service area only)	13,650	13,650	13,650	13,650	13,650
Local Surface Supply	22,900	22,800	22,700	22,600	22,500
Groundwater	3,100	3,100	3,100	3,100	3,100
Water Supply from SDCWA (purchased water)	161,334	202,488	225,390	234,398	23,4158
<b>Total City Water Supplies</b>	<b>200,984</b>	<b>242,038</b>	<b>264,840</b>	<b>273,748</b>	<b>273,408</b>
<b>Estimated Water Shortages</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: City of San Diego 2016b

AFY = Acre Feet Per Year

SDCWA = San Diego County Water Authority

**Table 35. City of San Diego Projected Water Demand and Supply in Single Dry Year**

Normal Year Demands/Supplies	Demands and Supplies (AFY)				
	2020	2025	2030	2035	2040
Water Demand	213,161	256,883	281,167	290,654	290,292
<b>Water Supplies</b>					
Recycled Water (City service area only)	13,650	13,650	13,650	13,650	13,650
Local Surface Supply	16,657	16,584	16,512	16,439	16,366
Groundwater	3,100	3,100	3,100	3,100	3,100
Water Supply from SDCWA (purchased water)	179,754	223,549	247,906	257,466	257,176
<b>Total City Water Supplies</b>	<b>213,161</b>	<b>256,883</b>	<b>281,167</b>	<b>290,654</b>	<b>290,292</b>
<b>Estimated Water Shortages</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: City of San Diego 2016b

AFY = Acre Feet Per Year

SDCWA = San Diego County Water Authority

**Table 36. City of San Diego Projected Water Demand and Supply in Multiple Dry Year**

Normal Year Demands/Supplies	Demands and Supplies (AFY)				
	2020	2025	2030	2035	2040
Water Demand	213,161	256,883	281,167	290,654	290,292
<b>Water Supplies</b>					
Recycled Water (City service area only)	13,650	13,650	13,650	13,650	13,650
Local Surface Supply	16,657	16,584	16,512	16,439	16,366
Groundwater	3,100	3,100	3,100	3,100	3,100
Water Supply from SDCWA (purchased water)	179,754	223,549	247,906	257,466	257,176
<b>Total City Water Supplies</b>	<b>213,161</b>	<b>256,883</b>	<b>281,167</b>	<b>290,654</b>	<b>290,292</b>
<b>Estimated Water Shortages</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

Source: City of San Diego 2016b

AFY = Acre Feet Per Year

SDCWA = San Diego County Water Authority

Wastewater treatment services are currently provided to the Project site by the City of San Diego's Public Utilities Department Wastewater Branch (Wastewater Branch). Wastewater generated on the Project site is routed for treatment through the existing sewer system to the Point Loma Wastewater Treatment Plant (PLWTP), which is owned by the City of San Diego. The PLWTP, located at 1902 Gatchell Road, San Diego, currently treats approximately 175 million gallons per day (mgd) of wastewater that is generated in a 450-square-mile area by more than 2.2 million City residents. Located on a 40-acre site on the bluffs of Point Loma, the PLWTP currently has a treatment capacity of 240 mgd (City of San Diego 2018). Treated effluent from the PLWTP is discharged to the ocean through a 4.5-mile-long ocean outfall off Point Loma.

Solid waste generated at the Project site is collected by a City of San Diego-franchised waste hauler (Allied Waste) and transported to a local landfill. The waste hauler must be City of San Diego approved per San Diego Municipal Code Section 66.0101. City of San Diego-approved waste haulers are allowed to dispose of municipal solid waste (MSW) at any of the landfills in San Diego County. West Miramar Landfill is the nearest landfill, located 8.7 miles north of the Project site. The West Miramar Landfill, located at 5180 Convoy Street, San Diego, California, currently has a maximum permitted throughput of 8,000 tons per day and a remaining capacity of 15,527,878 cubic yards (California Department of Resources Recycling and Recovery [CalRecycle] 2015).

San Diego Gas & Electric (SDG&E) provides electrical power and natural gas to the Project site. As a regulated public utility, SDG&E provides energy service to a population of 3.6 million people through 1.4 million electric meters and 873,000 natural gas meters within a 4,100-square-mile service area that includes San Diego and southern Orange Counties (SDG&E 2016). Existing uses on the Project site generate an electricity and natural gas demand of approximately 3,577 million kilowatt-hours and 24.6 therms per year, respectively (Appendix A).

### **Analysis of Environmental Impacts**

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?***

**No Impact.** During the construction phase, water would be used to suppress dust in accordance with SDAPCD rules. However, water would be trucked in and would not increase the use of on-site water.

The proposed Project operations would not change the use or increase the capacity of the HIWM. Therefore, there would be no increase in the use of water, wastewater, electricity, natural gas, or telecommunication facilities and no new facilities would be required. The proposed Project would involve upgrading utilities to current building standards and efficiency standards throughout the Project site, such as the installation of more efficient LED lighting and Energy-Star appliances. The proposed Project would also include the installation of more efficient water facilities to conserve water use on the Project site, including low-flow fixtures and appliances, drought-resistant landscaping, and automated irrigation systems.

Due to the installation of energy and water efficiency features, and the fact that the proposed Project would not increase capacity at the Project site, the proposed Project would result in a reduction of energy and water usage by the redeveloped marina facility compared to the existing marina facility. No new utility infrastructure upgrades/improvements would be required, aside from those completed on-site. Wastewater from the properties within the City is treated at the PLWTP, and the HIWM would continue to the existing sewer system in which wastewater is ultimately routed and treated at the PLWTP. Therefore, the construction and operation of the proposed Project would not require or result in the construction of new water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities that would result in significant environmental effects. No impact would occur and no mitigation measures would be required.

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?***

**Less Than Significant Impact.** As mentioned previously, water service is currently provided to the Project site by the City of San Diego. The City of San Diego relies heavily on imported water supplies from the Colorado River and State Water Project (approximately 85 to 90 percent of the City's total water supply) through agreements with the SDCWA and MWD. Existing water use on the Project site is 7,600 gallons a day.

Construction activities for the proposed Project would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout the construction of the proposed Project (from the start of construction to Project buildout). The amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. Based on preliminary construction information, it is anticipated that a water truck with a capacity of approximately 2,000 gallons would be needed for dust suppression and other landside construction activities. Water truck use would be limited primarily to the grading phase, which would last approximately 3 months (1 month for the west (Phase 1) parking lot, 2 months for the east (Phase 2) parking lot).

Given the temporary nature of construction activities, the short-term and intermittent water use during construction of the proposed Project would be less than the net water consumption of the proposed Project at buildout. In addition, water use during construction would be offset by the water currently consumed by the existing uses, which would be removed at part of the proposed Project's construction. No infrastructure improvements would be needed to provide water during the construction of the proposed Project.

As concluded in the City's 2015 UWMP, projected water demand for the City would be met by the available supplied during a normal year, single dry year, and multiple dry year in each year from 2020 through 2040. As previously identified, Project construction would occur over approximately 24 months and is anticipated to be completed in the summer of 2020. The existing marina was accounted for in the City's UWMP water demand projections. Therefore, the proposed Project's temporary and intermittent demand for water during



construction could be met by the City's available supplies during each year of Project construction. As such, construction related impacts to water supply and infrastructure would be less than significant and no mitigation measures would be required.

As described in Section 2, *Project Description*, the proposed Project upon buildout would include a reduction of 7,318 square feet of building space and the installation of drought tolerant landscaping. Due to the reduction in building square footage, the installation of drought-tolerant landscaping, and the inclusion of water efficient features (e.g., water-efficient toilets) as required under existing building code, operation of the proposed Project would result in a decrease in long-term water demand for consumption, operational uses, maintenance and other activities on the Project site.

The 2015 UWMP utilized SANDAG's 2050 Regional Growth Forecast data that provide for reliable water demand forecasts that take into account changes in population, housing units, and employment. Data collected as part of SANDAG's 2050 Regional Growth Forecast included existing and planning uses, zoning, current adopted general and community plans, and guidance on likely development patterns by 2050. As noted previously, the proposed Project would result in the redevelopment of an existing marina facility. Existing land uses and land use designations would not change with implementation of the proposed Project and land use intensities would not increase on the Project site. Therefore, the proposed Project would remain consistent with the assumptions provided in the SANDAG's 2050 Regional Growth Forecast, on which the City's 2015 UWMP assumptions rely on.

Based on the data above, the proposed Project's water demand has been accounted for in the City's overall total demand projections set forth in the City's 2015 UWMP. Specifically, the 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through 2040. Therefore, the decrease in water demand for the proposed Project falls within the available and projected water supplies for normal year, single dry year, and multiple dry years through 2040, as described in the City's 2015 UWMP.

As outlined in the 2015 UWMP, the City is committed to providing a reliable water supply for the City. The 2015 UWMP takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City of San Diego will meet all new demand for water through a combination of water conservation and water recycling. The 2015 UWMP also addresses the current and future State Water Project supply shortages and concludes the MWD's actions in response to the threats to the State Water Project will ensure continued reliability of its water deliveries to member agencies. By focusing on demand reduction and alternative sources of water supplies, the City will further ensure that long-term dependence on MWD supplies will not be exacerbated by potential future shortages.

Based on the above, the estimated water demand for the operation of the proposed Project would not exceed the available water supplies projected by the City of San Diego, including during normal, dry, and multiple dry years. Therefore, the City would be able to meet the water demand of the proposed Project, as well as the existing and planning future water demands of its service area. The proposed Project's operation related impacts on water supply would be less than significant and no mitigation measures would be required.

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

**Less Than Significant Impact.** As noted above, wastewater treatment services are currently provided to the Project site by the City of San Diego's Wastewater Branch. Wastewater generated on the Project site is routed for treatment through the existing sewer system to the PLWTP. The PLWTP currently treats approximately 175 mgd of wastewater and has a treatment capacity of 240 mgd (City of San Diego 2018).

During construction activities, wastewater would typically be generated from use of portable toilets for construction workers. The wastewater generated by the proposed Project during construction activities would not be expected to impact existing capacity or require facility expansion at the PLWTP. Impacts to wastewater treatment facility capacity during construction would be less than significant and no mitigation measures are required.

The Project site is already being serviced by the City of San Diego's Wastewater Branch, and the generation of wastewater by existing uses factored into the existing daily treatment throughput for PLWTP. Operation of the proposed Project would not result in an increase or intensity of uses on site. In addition, during operations, wastewater generated from HIWM would likely decrease when compared to existing conditions due to a smaller building footprint and a reduction in supporting uses on site. The wastewater generated by the proposed Project during operation would not be expected to impact existing capacity or require facility expansion at the PLWTP. Impacts to wastewater treatment facility capacity during operation would be less than significant and no mitigation measures are required.

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

**Less Than Significant Impact.** Solid waste generated at the Project site is collected by a City of San Diego-franchised waste hauler (Allied Waste) and transported to a local landfill. The waste hauler must be City of San Diego approved per San Diego Municipal Code Section 66.0101. City of San Diego-approved waste haulers are allowed to dispose of MSW at any of the landfills in San Diego County. West Miramar Landfill is the nearest landfill, located 8.7 miles north of the Project site. Because the West Miramar Landfill is nearest to the Project site and would be the least expensive in terms of transportation costs, it is anticipated that the majority of Project-generated solid waste during construction and operation would be disposed of there.

Under existing operations, solid waste is picked up and disposed of at the local landfill approximately twice a month. An on-site trash compactor compresses the majority of solid waste prior to pickup and disposal. In addition, a network of recycling containers and a recycling dumpster are maintained on site. Existing uses on site currently generate about 6 tons of solid waste each month or approximately 0.2 tons (400 pounds) of solid waste per day (District 2013b).

During site demolition and preparation approximately 16,860 cubic yards of demolition materials, including wood, glass, steel, and concrete from the existing HIWM would be disposed of in the West Miramar Landfill. Daily disposal at the West Miramar Landfill is approximately 3,900 tons per weekday with a maximum permitted throughput of 8,000 tons per day (California Department of Resources Recycling and Recovery [CalRecycle] 2015). The West Miramar Landfill currently has a remaining capacity of 15,527,878 cubic yards (CalRecycle 2015). The 16,860 cubic yards of demolition material associated with the proposed Project represents approximately 11,000 tons of material, which would be 0.11 percent of its total remaining capacity. Therefore, disposal of waste produced by the proposed Project during demolition and construction would not be expected to materially alter the capacity of the landfill. The impact on landfill capacity during construction would be less than significant and no mitigation measures are required.

Materials which are non-recyclable and hazardous such as ACM, lead-based paint materials, and other building finishes would be disposed of by an approved hazardous waste handler at an appropriate hazardous waste facility in accordance with Title 22 CCR Division 4.5, *Environmental Health Standards for the Management of Hazardous Wastes*. Any landscaping green waste would be disposed of at the Miramar Greenery.

During operations, solid waste generated from HIWM would likely decrease when compared to existing conditions due to a smaller building footprint and a reduction in supporting uses on site. Waste generated by users of the facility includes general trash and recyclables that are either removed from the site by the users or disposed of in District-provided trash cans near the facility. No net increase in waste volume or change in type of waste is expected. In addition, recycling at the Project site would continue in accordance with state and local diversion requirements such as the City of San Diego's Recycling Ordinance and the Clean Marina Program. Therefore, no operational impacts associated with this issue are anticipated to occur and no mitigation measures are required.

**e. *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?***

**Less Than Significant Impact.** The proposed Project would be required to comply with applicable elements of the RCRA (40 CFR Parts 239 to 282), the Toxic Substances Control Act (TSCA) (15 U.S.C.

Section 2601 et seq.), California Department of Toxic Substances Control's hazardous waste regulations (CCR, Title 22, Division 4.5), AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991), and other applicable local, state, and federal solid waste disposal standards such as AB 939 (Integrated Waste Management Act).<sup>15</sup> Demolition materials would be disposed of at the West Miramar Landfill while a recycling program would be implemented for operations as required by the City of San Diego's Recycling Ordinance. As such, the proposed Project would comply with federal, state, and local statutes and regulations related to solid waste. Impacts would be less than significant and no mitigation measures are required.

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<sup>15</sup> Assembly Bill (AB) 939 requires each city in the State to divert at least 50 percent of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting.

## XX. Wildfire

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

### Environmental Setting

The Project site is not located in or near state responsibility areas, or lands classified as very high hazard severity zone, as depicted by the California Department of Forestry and Fire (CAL FIRE) San Diego Very High Fire Hazard Severity Zones in LRA (CAL FIRE 2009).

**a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?***

**No Impact.** The proposed Project is for improvement of existing landside and waterside marina facilities and is not located in or near state responsibility areas or lands classified as very high hazard severity zone. In addition, the proposed Project would not alter circulation or access at the Project site or in the vicinity. Thus, the proposed Project would not impair an adopted emergency response plan or evacuation plan. There would be no impact.

**b. *Would the project, 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 Impact.** The proposed Project is surrounded by development and water and is not on a slope. The proposed Project would improve existing a recreational marina facility, and is not located within a Very High Fire Hazard Severity Zone. There are no factors that could exacerbate wildfire risk and therefore there would be no impact.

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

**No Impact.** The proposed Project is within a developed area that is not within a Very High Fire Hazard Severity Zone, thus the proposed Project does not propose infrastructure, such as fuel breaks or emergency water sources that are associated with wildfire protection. In addition, the Project site is an existing marina that is serviced by existing utilities and infrastructure, including roads, electricity, natural gas, water, and wastewater pipelines, and does not propose the construction of additional infrastructure. Therefore, the proposed Project would involve infrastructure that would exacerbate fire risk or result in temporary or permanent impacts to the environment and there would be no impact.

- d. ***Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

**No Impact.** The proposed Project and surrounding area is on flat land, and is not located within a Very High Fire Hazard Severity Zone. The proposed Project would not result in any drainage changes or slope instability. Thus, the proposed Project would not expose people or structures to significant risks as a result of runoff, post-fire slope instability or drainage changes, and there would be no impact.

## XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ( <i>Cumulatively considerable</i> means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### Environmental Setting

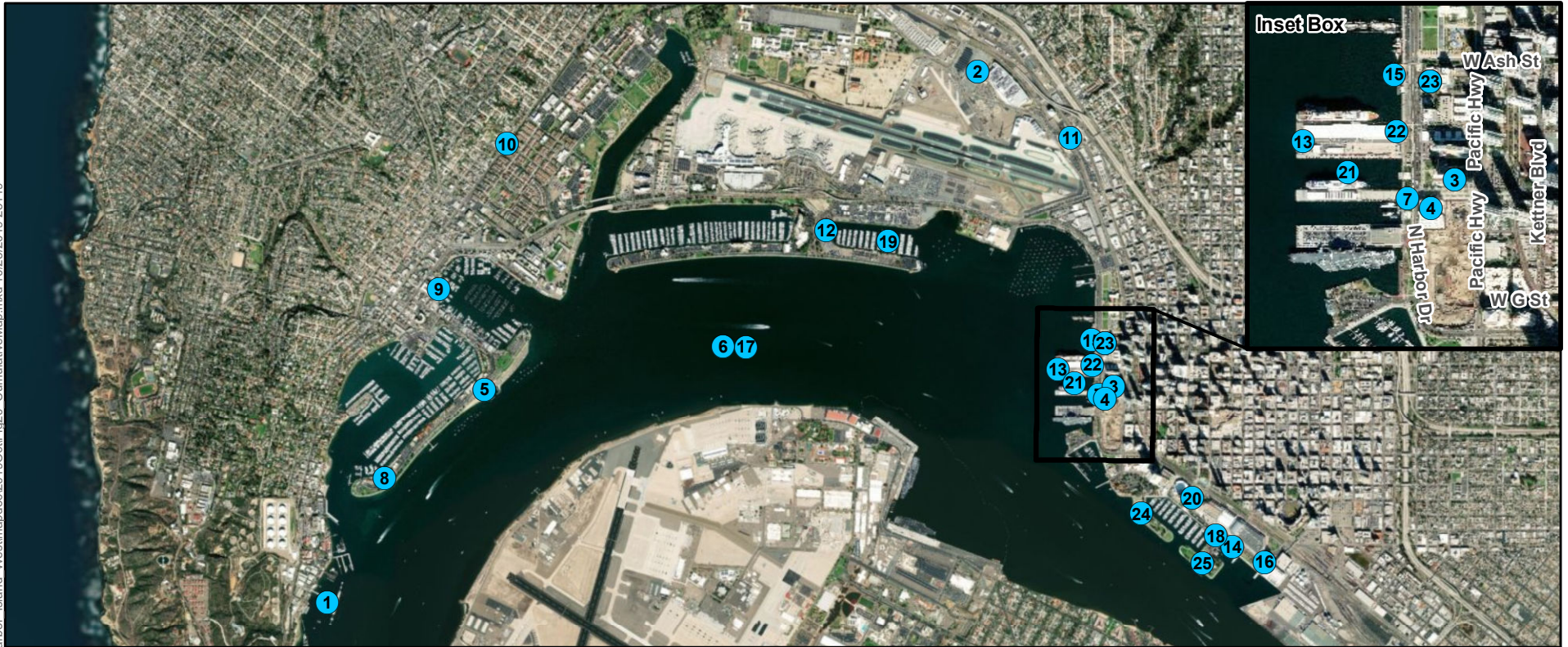
State CEQA Guidelines Section 15130 requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when viewed in connection with the effects of past, current, and probable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

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

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those projects outside the control of the lead agency, or a summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area-wide conditions. This information is provided below. Past projects for this document are defined as those that were recently completed (within the last five years) and are now operational. Present projects are defined as those that are under construction but not yet operational. Reasonably foreseeable future projects are defined as those for which a development application has been submitted or credible information is available to suggest that project development is a probable outcome.
- A summary of expected environmental effects to be produced by those projects. The summary shall include specific reference to additional information stating where that information is available.
- A reasonable analysis of the cumulative impacts of the relevant projects and an examination of reasonable options for mitigating or avoiding any significant cumulative effects.

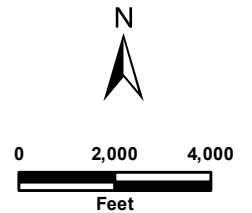
Based on information provided by the District and the City of San Diego, 30 cumulative projects were identified for this analysis. The projects listed in the proposed Project's cumulative study area have had applications submitted or have been approved, are under construction, or have recently been completed. These projects were selected based on their proximity to the project site and San Diego Bay along with the potential to contribute to cumulative impacts. The cumulative projects identified in the study area are listed in Table 37 (project numbering corresponds to numbers shown in Figure 20). Generally speaking, the geographic scope of the area affected by cumulative effects varies according to the issue area. The study area for each issue area is described further under the respective resource headings that follow.





#### Legend

- |  |  |
|--|--|
| 1. Naval Base Point Loma Fuel Pier (18) Replacement and Dredging     | 14. Fifth Avenue Landing Redevelopment   |
| 2. San Diego International Airport Master Plan – Parking Plaza       | 15. Portside Pier Restaurant Redevelopment Project   |
| 3. Lane Field North and South  | 16. San Diego Convention Center Phase III Expansion and Expansion Hotel as shown in the Port Master Plan |
| 4. Navy Broadway Complex   | 17. Integrated Planning Process - Port Master Plan Update  |
| 5. Shelter Island Boat Launch Facility Improvements Project          | 18. San Diego Symphony Bayside Performance Park Project  |
| 6. San Diego Bay + Imperial Beach Oceanfront Fireworks Display Event | 19. Harbor Island East Basin Industrial Subarea Redevelopment and Port Master Plan Amendment Project     |
| 7. North Embarcadero Plan and Port Master Plan Amendment             | 20. Marriott Marquis San Diego Hotel and Marina Facilities   |
| 8. Kona Kai Resort Hotel Expansion Project                           | 21. B Street Shore Power   |
| 9. Intrepid Landing Buildings A and B                                | 22. B Street Pier Cruise Ship Terminal Maintenance Projects  |
| 10. Navy Miramar Pipeline Repair and Relocation                      | 23a. Wyndham Hotel Renovations   |
| 11. Palm Street Observation Area                                     | 23b. Potential 205-foot setback park pursuant to NEVP Phase 1 CDP Conditions and MOU                     |
| 12. Lockheed Martin Company Marine Terminal Demolition Project       | 24. Redevelopment of the Elbow parcel on East Harbor Island  |
| 13. B Street Mooring Dolphin   | 25. Bayside Performance Park Enhancement Project   |



Source: ESRI World Imagery (2017)

**Figure 20**  
**Cumulative Project Locations**  
**Harbor Island West Marina Redevelopment Project**

**Table 37. Cumulative Projects**

	<b>Project Name (Estimated Completion)</b>	<b>Location</b>	<b>Description</b>	<b>Status</b>
1.	Naval Base Point Loma Fuel Pier (P151) Replacement and Dredging	Naval Station Point Loma and Alternative Bait Barge locations within State lands, San Diego, CA	Temporary Space and Naval Warfare Systems Center (SSC) marine mammal facilities at Naval Main and Anti-Submarine Warfare Command (NMAWC) and then relocation of the program to NMAWC; demolished existing Naval Base Point Loma Fuel Pier in phases so as to leave pier operational throughout project; constructed 71,180-square-foot double-deck replacement pier and performed associated dredging; returned SSC marine mammal program to original location.	Completed
2.	San Diego International Airport Master Plan – Parking Plaza	3225 North Harbor Drive, San Diego, CA	A parking plaza adjacent to Terminal 2 on the San Diego International Airport was constructed. The parking plaza is a three-story, 1,035 million square-foot approximately 34-48 foot-high parking structure with 1,753 new parking spaces over an existing surface parking lot with 1,323 parking spaces for a total of 3,076 parking spaces, removed 46 palm trees, landscaped, and graded 34,400 cubic yards (cy) (31,800 cy cut, 2,600 cy fill).	Completed
3.	Lane Field North and South	North side of Broadway between North Harbor Drive and Pacific Highway, San Diego, CA 91910	Two hotels (totaling 800 rooms), parking facilities, and retail uses on a 5.8-acre parcel formerly used as a parking lot. Construct park/plaza on western 150-feet of property.	Construction of Lane Field North and the park completed. Construction of Lane Field South began in June 2016 and anticipated to be completed in Fall 2018
4.	Navy Broadway Complex	Broadway/Harbor Drive/Pacific Highway, San Diego, CA 92101	Redevelopment of a 13.7-acre parcel with 2.9 million square feet of office space, including a 351,000-square-foot museum; 213,000-square feet of retail and restaurant space; more than 3,100 parking spaces; and a 1.9 acre public park at the corner of Broadway and Harbor Drive.	Development Agreement, Master Plan, Phase I Buildings Consistency Determination approved in 2009, Construction began 2017
5.	Shelter Island Boat Launch Facility Improvements Project	2210 Shelter Island Drive, San Diego, CA 92106	Repaired, maintained, and replaced the boat launch ramp, jetties (including public walkways), gangways, and floating docks, as well as minor improvements to the kayak launching area, restrooms, and parking.	Completed

San Diego Unified Port District  
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	Project Name (Estimated Completion)	Location	Description	Status
6.	San Diego Bay and Imperial Beach Oceanfront Fireworks Display Event	Throughout District tidelands	The project proposed the addition of an Ordinance to the Port District Code that would establish a program to regulate fireworks. Specifically, the program would govern the existing and proposed new fireworks display events requiring a discretionary action by the District or operated by the District's tenants that occur within the San Diego Bay and Imperial Beach Oceanfront. Four proposed new fireworks display events are anticipated to require a future discretionary action by the District, including three displays along the Chula Vista Bayfront and one display along the National City Bayfront.	EIR certified and Ordinance was adopted on May 25, 2017
7.	North Embarcadero Plan and Port Master Plan Amendment	North Harbor Drive between Laurel and G Street	This project consists of environmental review associated with the realignment of North Harbor Drive between Laurel Street and G Street in order to define the future character of North Embarcadero consistent with conditions specified in the California Coastal Commission-issued Coastal Development Permit (CDP) dated April 18, 2011 (District Clerk Document No. 58230) and a memorandum of understanding (MOU) entered into on November 9, 2010 (District Clerk Document No. 57019). The project will analyze plans for key public infrastructure improvements related to parks and open space, parking, traffic, and multi-modal circulation, including an analysis of 15 "planning elements" described in the CDP and MOU. This will be considered as part of the Port Master Plan Update.	Anticipated to be part of the Port Master Plan Update  <u>Public review of the Draft EIR has been completed scheduled for release in 2018</u>
8.	Kona Kai Resort Hotel Expansion Project	1551 Shelter Island Drive, San Diego, CA 92106	The project involves expansion and renovation of the existing Kona Kai Resort, as follows: 1) construction of 41 new guest rooms in two new buildings; 2) construction of a new two-story marina facility retail building; 3) construction of a new pool and pool deck; 4) expansion of the existing pool deck and construction of a new pool bar; and 5) renovation of the existing restaurant, spa and fitness center, conference and meeting facilities, guest rooms, lobby marina facility building, dock master building, beach, parking lot, and landscaping.	Completed

	Project Name (Estimated Completion)	Location	Description	Status
9.	Intrepid Landing Buildings A and B	2702 Shelter Island Drive, San Diego, CA 92106	The project involves construction of approximately 6,240 square feet of marine sales and service buildings with approximately 281 square feet of food service made up of Building A and B with parking, pedestrian walkway of 10-foot width, hardscape, and landscaping.	Completed
10.	Navy Miramar Pipeline Repair and Relocation	Between Naval Base Point Loma (NBPL) Defense Fuel Support Point (DFSP) in the NBPL Complex (south end of the pipeline) and the first 5 miles of pipeline extending out into the City of San Diego	The project would involve the repair and relocation of the existing Navy owned 8-inch Miramar Fuel Pipeline along various locations in the City of San Diego within the first five miles of the pipeline. The project is needed to maintain the safe, consistent, and continuous use of the pipeline between Defense Fuel Support Point Loma and Marine Corps Air Station Miramar. This project would repair various pipeline anomalies and mitigate potential geohazards to provide for the continued fueling needs of existing and future Navy ships.	In construction, construction anticipated to be completed Spring 2018
11.	Palm Street Observation Area	Palm Street/Pacific Highway/Admiral Boland Way, San Diego, CA 92101	Construction of an observation area for pedestrians to view the surrounding airport and approaching aircraft. Previously used as the main vehicle entrance to a former GA facility which was demolished and reconstructed to the north, the observation area is proposed on a remnant parcel of approximately 0.7 acre. The observation area would create a small park setting and provide an area from which pedestrians may observe aircraft approaching and departing the airport. In addition, light rail transit passengers from the Middletown trolley station will be guided to walk through the observation area to access the free bus shuttle to the airport terminals. The area will combine art, seating, landscaping, lighting, and pedestrian walkways. No vehicle parking will be provided	In construction
12.	Lockheed Martin Company Marine Terminal Demolition Project	1160 Harbor Island Drive, San Diego, CA 92101	The project involves demolition of 5,500 square feet of building space and removal of a pier and trolley rail.	<del>NOP release for EIR anticipated August 2019</del> <u>Landside demolition completed.</u>
13.	B Street Mooring Dolphin	B Street Pier, 1140 North Harbor Drive, San Diego, CA 92101	Moorings off the end of B Street Pier to allow for larger cruise ship docking.	<del>The Draft EIR was circulated in February 2013. The Final</del>

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	Project Name (Estimated Completion)	Location	Description	Status
				<del>EIR has not yet been certified</del> <u>Completed</u>
14.	Fifth Avenue Landing Redevelopment	South end of Fifth Avenue, between the back of the Convention Center and South Embarcadero Park, San Diego, CA 92101	Development includes: two hotel structures, one 44-story, approximately 498-foot tall 850-room hotel tower, and one 5-story, approximately 82-foot tall 565-bed lower-cost visitor-serving hotel; a 263-space parking structure; retail; meeting space; ancillary guest amenities; an optional bridge connecting the hotel to the Convention Center; approximately 85,490 square feet of public access areas approximately 3,190 square feet at ground level and 82,300 square feet on a podium level; and expansion of the marina by an additional 57,696 square feet of dock space. The project would maintain the existing 35-foot-wide bayfront promenade.	<del>Draft EIR released December 2017. Final EIR not yet certified.</del> <u>Project was not approved</u>
15.	Portside Pier Restaurant Redevelopment Project	1360 North Harbor Drive, San Diego, CA 92101	Redevelopment of an existing waterfront restaurant with a new facility, including new pilings, piers, decking, and structure. Development involves demolition of an existing restaurant and supporting structure (including 66 piles) and redevelopment with a new, two-story restaurant and supporting structure (on 53 piles). The new facility would be approximately 33,577 square feet and include three distinct dining establishments, a coffee and gelato shop, an expanded dock and dine for short-term boat berthing, and a public viewing deck. The project would involve an approximately 8,722-square-foot increase in building floor area and a 4,480-square foot net increase in water coverage. Restaurant seating would be increased by 464 seats. A new public viewing deck with approximately 108 seats is proposed and the replacement dock and dine boat dock would allow an increase in boat slips from 2 to 12 boat slips; however, 4 would be constructed initially.	<del>Under construction</del> <u>Completed</u>
16.	San Diego Convention Center Phase III Expansion and Expansion Hotel as shown in the Port Master Plan	111 West Harbor Drive, San Diego, CA 92101	This project consists of approximately 220,150 square feet of prime exhibit hall, approximately 101,500 square feet of meeting rooms, and approximately 78,470 square feet of ballroom space. The project would also add approximately 26,000 square feet of retail and a 5-acre	EIR certified and Port Master Plan Amendment approved by District Board in September 2012. PMPA certified by the Coastal

	Project Name (Estimated Completion)	Location	Description	Status
			rooftop park. The adjacent Hilton Bayfront Hotel would add an additional 500-room tower to the current configuration.	Commission in October 2013. The SDCC Phase III Expansion Project is currently unfunded and the San Diego Convention Center Corporation does not have real property rights to the site, but the City of San Diego has expressed interest in pursuing the project.
17.	Integrated Planning Process – Port Master Plan Update	Throughout District tidelands	Comprehensive Update of the Port Master Plan that is anticipated to include new topical sections, or elements, to provide Baywide guidance related to Land and Water Use, Coastal Access and Recreation, Mobility, Natural Resources, Safety and Resiliency, and Economic Development	<del>Planning Phase – Program</del> <del>EIR under preparation</del> <u>Public review of Draft EIR complete</u>
18.	San Diego Symphony Bayside Performance Park Project	Portion of Embarcadero Marina Park South, 224 Marina Park Way, San Diego, CA 92101	Construction of a permanent outdoor forum to facilitate concerts and events, including San Diego Symphony performances and rehearsals, guest seating, restrooms, ancillary structures, and public park improvements and amenities.	<del>EIR certified on January 9, 2018. In entitlement phase</del> <u>Completed</u>
19.	Harbor Island East Redevelopment/ <del>Topgolf Basin Industrial Subarea Redevelopment</del> and Port Master Plan Amendment Project	East Basin Industrial Subarea of Planning District 2 (Harbor Island/Lindbergh Field); bounded by the U.S. Coast Guard station to the east, Harbor Island Drive to the west, Harbor Drive to the north, and a water navigation area to the south adjacent to Sunroad Resort Marina	Approximately 35 acres of land <del>and 13 acres of water</del> . Preliminarily maximum buildout envelope of up to 2.5 million square feet of mixed-use development, including retail/restaurant establishments, maritime-related or water-dependent office space, hotel rooms, and Harbor Police Department/Port Administration facilities, as well as 534,000 square feet of public open space. Other project components would consist of <del>potential demolition of existing land improvements and water improvements and potential filling and/or reuse of the Convair Lagoon remediation cap</del> . The proposed project would require a Port Master Plan Amendment (PMPA).	<del>Concept proposed, no application and not entitled</del> <u>EIR process underway</u>



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Harbor Island West Marina Redevelopment Project

	Project Name (Estimated Completion)	Location	Description	Status
20.	Marriott Marquis San Diego Hotel and Marina Facilities	333 West Harbor Drive	This project included the demolition of the former 131,500-square-foot Marriott Hall to accommodate a new facility containing 71,800 square feet of ballroom and meeting space. The new Marriott Hall, which includes a ballroom, an exhibit hall space, an outdoor event area, and a new marina bathroom facility, increased the gross building area from 131,500 square feet to 169,400 square feet, and the total building footprint increased from 60,900 square feet to 80,400 square feet. The project did not increase the number of hotel rooms at the hotel.	Completed
21.	B Street Shore Power	B Street Pier and Broadway Pier, 1140 and 1000 North Harbor Drive	Project consists of infrastructure components to provide shore power to existing terminal operations at the B Street and Broadway Piers (three berths) with the result of reducing air pollutant emissions and greenhouse gas emissions while cruise ships are berthed. Initially, shore power will be available to one ship at a time; in subsequent years, two ships will be able to use shore power at the same time.	<del>Initial phase completed in December 2010. The second phase is scheduled to be completed in 2017.</del> <u>Phase I and II completed</u>
22.	B Street Pier Cruise Ship Terminal Maintenance Projects	B Street Pier, 1140 North Harbor Drive	Projects on B Street Pier addressing routine maintenance requirements to improve safety, security, integrity, aesthetics, and comfort of this facility. Roof replaced, roll-up and rolling rate doors installed, fire system upgraded, cleaned and painted ceilings and hangers, mobile gangway and platform painted, and a photovoltaic system.	Completed
23a.	Wyndham Hotel Renovations	1355 North Harbor Drive	The project proposes the demolition of 28,685 square feet of existing facilities, to relocate the hotel entrance to Pacific Highway and A street, construction of approximately 70,303 square feet to include a new lobby, pool deck, retail and pavilions, 2.8 acres of public space, and the addition of 141 parking spaces on a new parking deck on the existing parking structure. This project may include a setback park along its western edge.	Proposed, not entitled.
23b.	Potential 205-foot setback park pursuant to NEVP Phase 1 CDP Conditions and MOU	1355 North Harbor Drive, San Diego, CA 92101	This project involves two alternative 205-foot waterfront setback park as specified in the NEVP Phase 1 CDP dated April 18, 2011 (District Clerk Document No. 58230) and Memorandum of Understanding (MOU) entered into on November 9, 2010 (District Clerk Document No.	Anticipated to be part of the Port Master Plan Update EIR currently under preparation



	Project Name (Estimated Completion)	Location	Description	Status
			57019). The alternate 205-foot setback park is part of the 15 “planning elements” to be analyzed on equal footing and considered as part of a proposed amendment to the Port Master Plan or as part of the Port Master Plan Update.	
24.	Redevelopment of the Elbow parcel on East Harbor island	7-acre parcel of land north of the East Basin Industrial Subarea in the current PMP known as the Elbow parcel	Involves an approximately 500-room hotel with other amenities including swimming pools, spas, gym, retail shops, open space event lawn, and a viewing deck.	<del>Proposed, not entitled</del> <u>Entitled</u>

~~25.~~

~~Bayside Performance Park Enhancement Project~~

~~Embarcadero Marina park South (EMPS)~~

~~Involves the replacement and enhancement of structures in the EMPS and new facilities including the Bayside Performance Park, a new performance and event venue to hold up to 10,000 attendees and various other park improvements.~~

~~EIR certified on January 9, 2018. Construction anticipated to commence 2019/2020.~~

### **Analysis of Environmental Impacts**

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

**Less Than Significant Impact with Mitigation Incorporated.** The waterside portion of the Project site provides eelgrass habitat for fish and other marine wildlife species. Mitigation is required to ensure that direct and indirect impacts on the eelgrass habitat would not be significant (see **MM-BIO-4**). In addition, the effects of noise generated by pile driving on marine wildlife would be significant if the pile driving caused harm to marine species such as East Pacific green sea turtle and marine mammals. Mitigation would require pile-driving to use a soft-start method to reduce noise impacts and require a biological monitor during all pile-driving activities (see **MM-BIO-1** and **MM-BIO-2**). **MM-HWQ-1** through **MM-HWQ-3** would require silt curtains to reduce turbidity from in-water construction activities, water quality monitoring, and a series of response actions if any issues are observed. In addition, initiation of construction activities would be timed to minimize potential impacts to nesting birds (**MM-BIO-3**). No other potential biological resources impacts would occur, and the proposed Project would not substantially degrade the quality of the environment, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Also, because Harbor Island was not created until the 1960s and the current facilities on the Project site were not developed until the early 1970s, the buildings do not meet the age threshold requiring evaluation for listing in the California Register of Historical Resources. Impacts would be less than significant with mitigation incorporated.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? (Cumulatively considerable means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)***

**Less Than Significant with Mitigation Incorporated.** Given that the proposed Project would have no impact on agriculture and forest resources, mineral resources, or wildfire, it was determined that the proposed Project would have no potential to result in cumulative impacts related to those resource areas. The proposed Project would have less than significant impacts, in some cases only with mitigation incorporated, on aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, GHGs, hazards and hazardous materials, hydrology and water quality, land use and planning, noise and vibration, population and housing, public services, recreation, transportation, tribal cultural resources, and utilities. The proposed Project would not result in any significant and unavoidable impacts. The proposed Project's cumulative effect on these resources is discussed below.

#### ***Aesthetics***

The proposed Project would have no impacts on scenic vistas or scenic resources located along a scenic highway. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts related to degrading the existing quality of the site and its surroundings during the construction phase as well as potential new sources of glare during the construction and operational phases. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to degrading the existing visual quality of the site substantially and as new sources of glare. The cumulative study area considered for the aesthetics cumulative analysis includes the Project site, Harbor Island, SDIA, and nearby projects in Point Loma.

### **Past, Present, and Reasonably Foreseeable Future Projects**

Past projects are developed and operational and do not degrade the existing quality of the site or its surroundings because they are consistent with the existing visual character of the area, nor do they result in substantial light and glare. Present projects would have varying degrees of construction-related aesthetic impacts; however, the presence of construction equipment and vehicles is not uncommon in the urban setting, nor are they considered elements that produce a substantial amount of glare during the day or light during the night. Once operational, all projects are expected to result in little or no change to the surrounding aesthetics. If reasonably foreseeable future projects are approved, the construction and operation of these projects would also be consistent with the existing visual character. Therefore, the impact on aesthetic resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

### **Proposed Project**

As described in Section I, *Aesthetics*, the proposed Project's aesthetic impacts would be limited to the presence of the construction equipment, which would not be visually obtrusive. Construction equipment would be moved around the site and then removed from the site when no longer needed. Therefore, the proposed Project's incremental cumulative contribution to the cumulative aesthetic impact would not be cumulatively considerable.

### *Air Quality*

The proposed Project would have no impacts related to conflicts with the applicable air quality plan. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to this issue area.

The proposed Project would have less than significant impacts related to air quality standards, health risk, and odors during Project construction and operations. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to air quality standards and the nonattainment status of criteria pollutants.

The entirety of the SDAB, which is contiguous with San Diego County, represents the cumulative geographic scope for air quality impacts related to consistency with air quality plans and air quality threshold levels because plans and thresholds are established at the air basin-wide level. Cumulative health impacts on sensitive receptors and odors are considered at a more localized level because of the more limited area of dispersion and include the surrounding neighborhoods and areas within proximity to the source of the odor, respectively.

### **Past, Present, and Reasonably Foreseeable Future Projects**

The SDAB is currently in nonattainment for ozone under NAAQS as well as ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> under CAAQS. Therefore, the emissions of concern are ozone precursors (ROG and NO<sub>x</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. The nonattainment status for the entire County is a consequence of past and present projects and will be further impeded by reasonably foreseeable future projects, such as those listed in Table 37. The past, present, and reasonably foreseeable future projects that could contribute cumulative impacts on localized air quality conditions generally include construction related to the following nearby projects: San Diego International Airport Master Plan – Parking Plaza (#2), Lockheed Martin Company Marine Terminal Demolition Project (#12), and the Harbor Island East Basin Industrial Subarea Redevelopment and Port Master Plan Amendment Project (#19). Air quality impacts from past, present, and probable future projects would be cumulatively significant because of this non-attainment status.

## Proposed Project

Construction of the proposed Project is expected to ~~begin in 2020 and finish in the summer of 2022 take two years.~~ As discussed under *Air Quality*, response III.b., and shown in Tables 6 and 7, criteria pollutant emissions are expected to be below San Diego County's SLTs for all nonattainment criteria pollutants and their precursors during construction. Moreover, once constructed, operational emissions would be reduced for all criteria pollutants, relative to existing conditions, due to the reduction in total building area ~~and number of boat slips~~, thereby resulting in no impact on air quality. Because the proposed Project would result in less than significant impacts during construction and would have no impact during the operational phase as discussed under response III.b, the Project's operation would have no potential to contribute to cumulative air quality impacts, including cumulative health risk impacts. However, it is still possible that the proposed Project, when combined with current, proposed, or reasonably foreseeable construction projects, could result in localized air quality and health risk impacts because of the effects from dust-generating activity (i.e., demolition, grading) and construction equipment operations associated with diesel exhaust. The cumulative projects that could contribute cumulative impacts to localized air quality and health risk conditions generally include construction of the closest projects (i.e. #5 and #12). ~~However, project # 5 has been completed and the landside portion of project #12 has been completed. The concept for Projects #5, #12, and #17 have been proposed, but no development schedule have been proposed for these projects. Thus, it is likely construction for these three projects would occur after the proposed Project construction is complete.~~ Moreover, each current, proposed, or foreseeable construction project is subject to the same SDAPCD rules and regulations that would reduce emissions from the proposed Project, including fugitive dust control per Rule 55. Additionally, the proposed Project would conform to SDAPCD's relevant air quality plan and would not cause congestion on nearby roadways. Thus, because the proposed Project would not exceed relevant mass emissions thresholds (San Diego County's SLTs), its incremental effect on regional air quality is not expected to result in a cumulatively considerable net increase in a nonattainment pollutant, and the proposed Project's cumulative contribution would not be cumulatively considerable.

## Biological Resources

The proposed Project would have no impacts on wetlands, fish, or wildlife movement; local policies protecting biological resources; or habitat conservation plans. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts after mitigation is incorporated on noise effects on marine mammals, sea turtles, and fish from pile driving, and on eelgrass habitat from the dock reconfiguration. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to noise effects on marine mammals, sea turtles, and fish from pile driving, and on eelgrass habitat. The cumulative study area considered for the biological resources cumulative analysis includes the Project site and surrounding area out to a 0.5-mile radius.

## Past, Present, and Reasonably Foreseeable Future Projects

Several of the cumulative projects would have potential impacts on migratory bird nesting, including any of the projects that have on-site trees or structures. Projects sites in the area also support least tern foraging and eelgrass habitat. However, mitigation that avoids or replaces impacts on eelgrass; implements soft-start and silt curtains, and a monitor during pile driving would reduce cumulative impacts to less than significant. Initiation of Project construction that would impact birds nesting in on-site trees would occur outside the peak nesting season. Therefore, the impact on biological resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

## Proposed Project

As described in Section IV, *Biological Resources*, the waterside portion of the Project site provides eelgrass habitat for fish and other marine wildlife species. Mitigation is required to ensure that direct and indirect impacts on the eelgrass habitat would not be significant (see **MM-BIO-4**). In addition, the effects of noise generated by pile driving on marine wildlife would be significant if the pile driving caused harm to marine species such as East Pacific green sea turtle, managed fish species under the Coastal Pelagic Species FMP and Pacific Coast Groundfish FMP, California least tern, and marine mammals. Mitigation would require pile-driving to use a soft-start method to allow animals to leave the area prior to full impact hammering (see **MM-BIO-2**) and would require monitoring by a qualified biologist during all pile-driving activities (see **MM-BIO-1**). In addition, initiation of construction activities would be timed to minimize potential impacts to nesting birds as ensured through **MM-BIO-3**. Potential turbidity impacts to foraging birds would be reduced to less than significant through implementation of **MM-HWQ-1** through **MM-HWQ-3**. None of the proposed Project's impacts on biological resources would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the proposed Project's incremental contribution to cumulative biological resource impacts would not be cumulatively considerable.

## Cultural Resources

The proposed Project would have no impacts on historical resources. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to this issue area.

The proposed Project would have less than significant impacts related to archaeological resources and human remains. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to disturbing archaeological resources or human remains. The cumulative study area considered for the cultural resources cumulative analysis includes the projects identified on Figure 20.

## Past, Present, and Reasonably Foreseeable Future Projects

Projects that propose ground disturbing activities would have the potential to disturb archaeological resources and human remains, which include most of the projects identified in Table 37. However, based on the previous development within the cumulative study area, it is unlikely that present or future projects would encounter human remains. Present and future projects could result in impacts to archaeological resources; however, monitoring would likely reduce impacts to less than significant levels. Therefore, the impact on cultural resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

## Proposed Project

As described in Section V, *Cultural Resources*, the proposed Project's cultural resources impacts would be limited to the low probability that ground disturbing activities would disturb archaeological resources or human remains. A review of historic maps shows that the Project area is situated on an artificial landform area created by bay infill and is within a highly developed environment that has been severely disturbed by development; thus, the potential for any buried resources to exist on the Project site is low. Therefore, the proposed Project's incremental cumulative contribution to the cumulative cultural resources impact would not be cumulatively considerable.

## Energy

The proposed Project would have no conflicts with or obstruct state or local plans for renewable energy or energy efficiency. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts related to wasteful, inefficient, or unnecessary consumption of energy resources during project construction, and no impacts during project

operation. The cumulative study area includes the SDG&E service area, as discussed in Section XIX, *Utilities and Service Systems*.

### **Past, Present, and Reasonably Foreseeable Future Projects**

The past, present, and reasonably foreseeable future projects that could contribute cumulative impacts on energy consumption during construction are projects with overlapping construction schedules, ~~such as the Bayside Performance Park Enhancement Project (#25)~~. This project involves the replacement and enhancement of existing structures and new facilities, which would likely require the use of fuel and electricity to power construction equipment. This represents a minor increase in energy consumption that would cease upon completion of the project. Therefore, the impact on energy consumption from past, present, and reasonably foreseeable future projects is not cumulatively significant.

### **Proposed Project**

As described in Section VI, *Energy*, the proposed Project operation would result in reduced energy demands from current usage as all light fixtures would be replaced with LED lights, low flow fixtures and appliances would be used and all new appliances would be Energy-Star qualified and irrigation of new drought-tolerant landscaped areas would be efficient. Project construction would result in a minor and temporary increase in consumption of fuel and electricity, primarily to power construction equipment. Therefore, the proposed Project's incremental contribution to energy consumption would not be cumulatively considerable.

### ***Geology and Soils***

The proposed Project would have no impacts related to faults, landslides, expansive soils, and septic/alternative waste disposal systems. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts after mitigation is incorporated from ground shaking, liquefaction, and lateral spreading, and less than significant impacts from erosion. The proposed Project would also have less than significant impacts related to paleontological resources. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to ground shaking, liquefaction, lateral spreading, erosion, and paleontological resources. The cumulative study area considered for the geology and soils cumulative analysis includes the Project site, Harbor Island, SDIA, and portions of the community of Point Loma, approximately 0.5 mile from the Project site.

### **Past, Present, and Reasonably Foreseeable Future Projects**

None of the present or reasonably foreseeable cumulative projects would increase potential hazards associated with geology and soils because they would not cumulatively exacerbate the potential for harm to people or damage to structures by their implementation. All projects that include habitable elements incorporate the geotechnical and structural requirements of the current California Building Code, which has incorporated recommendations from the Uniform Building Code, now referred to as the International Building Code. These measures would reduce damage from geologic hazards, such as ground shaking, liquefaction, soil erosion, and lateral spreading, by ensuring that soils would be suitable for a building foundation and requiring the use of materials and techniques that significantly reduce the potential for serious damage to new structures.

Several projects in the cumulative study area are located on underlying formations (e.g., Bay Point Formation) that have high potential for containing paleontological resources. Projects such as #14 propose cut depths into the underlying formation would have potentially significant impacts on fossil resources. Mitigation that requires monitoring would reduce impacts on paleontological resources to less than significant; on the cumulative level, impacts on paleontological resources would not be significant because impacts would largely be avoided through mitigation or because Project grading and excavation would not reach depths great enough to have a significant impact. Therefore, at the cumulative level, geologic and soil impacts from past, present, and reasonably foreseeable future projects are not significant.

### **Proposed Project**

As discussed in Section VII, *Geology and Soils*, the proposed Project would have a less than significant impact with mitigation related to geology and soils because it would not substantially increase the risk of geologic or soil hazards, and it would comply with existing grading requirements, the recommendations contained in the Project-specific landside and waterside geotechnical studies (see **MM-GEO-1**), and the California Building Code. In addition, the landside excavation activities would not extend below the artificial fill and into the Bay Point Formation, and waterside activities would not require the removal of sediments. None of the proposed Project's impacts on geology and soils would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the proposed Project's incremental contribution to geology and soils impacts would not be cumulatively considerable.

#### *Greenhouse Gas Emissions and Climate Change*

The proposed Project would have a less than significant impact related to GHG emissions, would not conflict with the District's Climate Action Plan, AB 32, Executive Order S-03-05, or Executive Order B-29-15 ~~less than significant impact~~. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to GHG emissions. GHG emissions and the effects of climate change are a cumulative global issue and accumulate in the earth's atmosphere for many years. Therefore, the cumulative study area is the entire globe.

#### **Past, Present, and Reasonably Foreseeable Future Projects**

All of the cumulative projects would contribute varying amounts of GHG emissions, which, when combined, would be considered cumulatively significant.

#### **Proposed Project**

As discussed under response VII.a, GHG emissions associated with the proposed Project would be reduced relative to existing conditions. As shown in Tables 14 and 15, emissions would be reduced and thus far below the chosen threshold level which demonstrates the Project's fair share of the reductions consistent with AB 32. The proposed Project is also consistent with the District's CAP reduction targets and measures, including EB6 (efficient lighting), EH3 (water conservation), and SW1 (debris recycling). Moreover, the proposed Project would exhibit "substantial progress" towards post-2020 goals by reducing total building area and ~~number of slips~~ relative to existing conditions, resulting in a reduction in GHG emissions from the Project site over the long-term, as there would also be a decrease in energy or water consumption relative to existing conditions. Long-term visitation (vehicle trips and boating) is expected to remain unchanged, but emissions associated with vehicle trips, building energy use, water use, and boating reduce over time as vehicle statewide and CAP measures continue to be implemented and newer post-2020 measures are proposed. The analysis compares Project emissions to existing conditions under the assumption that existing emissions would remain similar into 2020 and beyond and does not take into account emission reductions implemented by the state and through the District's CAP that would reduce GHG emissions over time. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that could have a significant impact on the environment. The proposed Project's contribution to cumulative GHG emissions during construction and its 40-year operation would not be cumulatively considerable.

#### *Hazards and Hazardous Materials*

The proposed Project would have no impact related to handling hazardous materials within proximity to a school, interference with an emergency evacuation plan, or the potential for wildland fires. In addition, it would not create a hazard associated with a private airstrip. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts with mitigation related to the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset conditions involving hazardous wastes; being included on the Cortese List (closed case); and being located within 0.5 mile of SDIA. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and



probable future projects as they relate to these issues. The cumulative study area considered for the hazards and hazardous materials cumulative analysis includes the Project site, Harbor Island, SDIA, and portions of the community of Point Loma, approximately 0.5 mile from the Project site.

### **Past, Present, and Reasonably Foreseeable Future Projects**

Cumulative projects would require the routine transport, use, or disposal of hazardous materials; however, none of the projects use or would use acutely hazardous materials or materials that are more hazardous than commonly used hazardous materials, such as petroleum and related products, cleaners, herbicides, and pesticides. Moreover, none of the projects would result in reasonably foreseeable upset conditions involving hazardous wastes that would not be mitigated to avoid a significant impact. Moreover, all sites that are on the Cortese List would require remediation and/or capping before being deemed suitable for occupancy. Finally, all of the projects are within 2 miles of SDIA; however, it is expected all present and future projects would comply with the existing ALUCP, which would avoid a cumulatively significant impact.

### **Proposed Project**

The proposed Project would comply with all hazardous material regulations involving the transport, use, and disposal of hazardous materials, including existing regulations that require proper removal and disposal of ACM and lead-based paints. In addition, **MM-HAZ-1** would be implemented to avoid hazards to the public and environment associated with any disturbed, impaired sediments. Although the Project site once had two open site contamination cases, both have been remediated and given a closed status by the San Diego County DEH. Their successful remediation combined with the consideration that the proposed Project would not directly excavate in the immediate area of the former contamination sites, supports the determination that the proposed Project would not contribute to a cumulatively considerable hazardous materials impact.

The proposed Project would also comply fully with the applicable ALUCP. It would not introduce a substantial number of people to safety hazards or create any new safety hazards from its design. Therefore, because the proposed Project would be fully compliant with existing hazardous materials regulations and the ALUCP and because there would be a very low potential to encounter on-site contamination, the proposed Project's contributions to cumulative impacts related to hazards and hazardous materials would not be cumulatively considerable.

### *Hydrology and Water Quality*

The proposed Project would have no impact related to the depletion of groundwater supplies or an exceedance of existing stormwater capacity. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts, some with mitigation incorporated, related to violating water quality standards; altering drainage, which could lead to erosion; or risking release of pollutants due to project inundation. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to water quality standards, erosion, and pollutant release. The cumulative study area considered for the hydrology and water quality cumulative analysis includes the Project site, Harbor Island, SDIA, portions of the community of Point Loma, and the San Diego Bay as a receiving water. Additionally, the proposed Project would have a less than significant impact related to sea-level rise. The cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to sea level rise.

### **Past, Present, and Reasonably Foreseeable Future Projects**

Past projects as well as present and future projects have been and will continue to be required to prepare water quality management plans, such as SWPPPs and USMPs, and comply with the requirements of their respective jurisdictions. San Diego Bay is a 303(d) impaired water body; however, regulations are having positive effects on water quality. Although future projects will be sources of additional polluted runoff and capable of causing erosion, such plans will ensure that runoff is contained on-site or treated prior to being

discharged into the storm drainage system and erosion is minimized through the use of stabilizing measures. The cumulative effects from projects #1 through ~~#24~~ 25 are not cumulatively significant.

Regarding SLR, projects would not combine to increase the effects of SLR (i.e., greater SLR) as SLR would be an effect of the environment on cumulative projects that would not be affected by a single project or even several projects. Thus, the impact on SLR from cumulative projects would not be cumulatively significant.

### **Proposed Project**

The proposed Project would prepare a SWPPP during the construction phase and a SWQMP for post-construction. These two plans would specify BMPs to ensure that the proposed Project would not result in an adverse cumulative contribution to cumulative water quality in the area, including the bay. Moreover, in-water work, such as the pile removal and pile driving, would stir sediments along the floor of the bay. However, this activity would be localized and would not combine with the cumulative impacts of other projects, and **MM-HWQ-1** through **MM-HWQ-3** would be implemented to ensure that no nuisance turbidity affects water quality. Therefore, the proposed Project's incremental contribution to cumulative impacts would not be cumulatively considerable.

The cumulative effect of SLR on the proposed Project would not be substantially worsened by the cumulative projects. While all of the cumulative projects may face SLR beyond 2100, the effect of SLR on one or more of the cumulative projects would not worsen the effect of SLR on the Project site. Similarly, the fact that the Project site may be inundated at a time beyond 2100 (assuming no adaption measures are implemented at a future date) would not mean the Project's contribution to cumulative SLR impacts would be cumulatively considerable as the proposed Project's inundation would not cause more cumulative projects to be inundated. In any case, SLR beyond 2100 is beyond the scope of the proposed Project, which only requests a ~~5040~~ year operational lease. Considering sea level rise, at the end of the lease (~~2070~~~~2060~~) the low point of the Project site is projected to remain ~~3.2-4.8~~4.1-5.2 feet above the 100-year storm surge water level. Therefore, over the lease of the Project, the Project site is not expected to experience any permanent or temporary inundation.

Even when looking out to 2100, the site would remain 3.2 feet above a 2100 100-year storm surge if the low risk aversion sea level projections come to pass. If the medium-high risk aversion sea level projections materialize, the site could be inundated by up to 0.2 feet (2.4 inches) of water during a 100-year storm surge in the year 2100. However, given the range of projections and the uncertainty in the 2100 time period, no actions are necessary at this time and it is anticipated that the proposed Project's contribution to cumulative SLR would not be cumulatively considerable.

### *Land Use and Planning*

The proposed Project would have no impact related to the division of an established community and would not conflict with any applicable habitat conservation plans. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have a less than significant impact related to a potential conflict with adopted plans and policies. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to potential conflicts with adopted plans and policies. The cumulative study area considered for the land use and planning cumulative analysis includes the Project site and Harbor Island.

### **Past, Present, and Reasonably Foreseeable Future Projects**

Past, present, and future projects within the cumulative study area are consistent with the surrounding land and water uses (i.e., Commercial Recreation, Recreational Boat Berthing, Fueling Dock, and Sanitary Pump Dock). These projects either assist with public access and recreation at the waterfront or support existing uses that do so. Therefore, these projects are consistent with applicable plans and policies, such as the guidance provided by the PMP and the regulations associated with Chapters 3 and 8 of the California Coastal Act. Impacts from these projects would not be cumulatively significant.

## Proposed Project

The proposed Project would be consistent with the applicable plans and policies, such as the PMP and California Coastal Act. The proposed Project would continue to operate as a recreational marina with visitor-serving uses such as a ~~restaurant-deli~~ and marine-related businesses. The proposed Project would also construct a public promenade for the general public's use and enjoyment; it would also redevelop the existing viewing deck for public use. The waterside portion of the Project would redevelop the existing dock and improve the general safety of the marina, maintaining consistency with the Recreational Boat Berthing designation of the PMP. None of the proposed Project related actions would impede coastal access, including public access to the waterfront. In addition, the building would be reduced in size to address market demand. Therefore, the proposed Project's contribution to cumulative impacts would not be cumulatively considerable.

## Noise and Vibration

The proposed Project would have no impacts related to creating a substantial permanent increase in ambient noise or exposing people at the Project site to excessive noise levels from private airstrips. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to these issue areas.

The proposed Project would have less than significant impacts related to generating noise levels during the construction phase that would be in excess of standards, exposing persons to excessive ground-borne vibration during the construction phase (primarily related to pile driving), temporary increases in ambient noise during the construction phase, or exposing people to noise from nearby airports (SDIA and Naval Air Station North Island). Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these issues. The cumulative study area considered for the noise and vibration cumulative analysis includes the Project site and a radius of approximately 0.25 mile from the site.

## Past, Present, and Reasonably Foreseeable Future Projects

The cumulative projects all have (or had) construction phases that generated noise and vibration. Projects that overlap during the construction phase may cause a cumulatively significant impact. However, the cumulative projects are fairly spaced out from one another, and noise quickly dissipates over distance. Thus, construction noise generated from the east side of SDIA (#11) would be too far from development on Harbor Island to result in a cumulative noise impact. Moreover, although several of the projects are within the AIA of SDIA, the noise exposure for people working at these project locations is not excessive. Modern building standards ensure that noise levels within buildings are acceptable (generally 45 dBA or less) and outside areas, particularly at project sites that are farther away from the airport, are only intermittently interrupted by airport noise. The interruptions are not excessive and not to a level that causes extreme annoyance or health issues. Therefore, because only a few project construction schedules overlap, the projects are far enough away from one another to avoid increased noise in the aggregate, and the projects do not expose people to harmful noise levels, the combined noise impacts from past, present, and future projects are not cumulatively significant.

## Proposed Project

The proposed Project would generate temporary noise and vibration associated with construction activities. However, no sensitive receptors (e.g., residential, health care, or educational facilities) would be affected. Noise from construction, particularly Phase 1, would occasionally produce loud noises at adjacent District parks (i.e., Spanish Landing Park West and Harbor Island Park) in the range of 67 to 70 dBA over a 12-hour period. Although noise would be present at these locations, it would be temporary, and park users would be able to relocate farther away from the site. The worst-case noise increases would be limited to the noisiest (i.e., closest) periods of Phase I construction only and would cease as soon as pile driving activities stop. Furthermore, all construction noise levels would be below the City of San Diego's construction noise standard of 75 dBA 12-hour  $L_{eq}$ . Therefore the temporary ambient noise increase impacts associated with these receptors would not be cumulatively considerable.

The proposed Project would replace existing facilities with similar facilities, but on a smaller scale, and would retain the existing function of the marina. As such, operation of the proposed Project would not introduce new noise sources and operational noise that does occur would be similar to or less than the existing condition given the reduced size of the marina. Therefore, the proposed Project's contribution to cumulative noise impacts would not be cumulatively considerable.

#### *Population and Housing*

The proposed Project would have no impact related to displacing housing or people. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to either of these issue areas.

The proposed Project would have less than significant impacts related to inducing substantial population growth. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to substantial population growth. The cumulative study area considered for the population and housing cumulative analysis includes an approximately 0.5-mile radius around the Project site.

#### **Past, Present, and Reasonably Foreseeable Future Projects**

Cumulative projects at SDIA are growth-accommodating projects because they would allow more efficient air travel to and from San Diego and would be able to process more air travelers. The hotel projects are also growth accommodating because they would allow more visitors to access the San Diego waterfront. However, the projects are not growth inducing. For instance, the additional parking at SDIA would not lead more people to want to move to San Diego. Similarly, the hotel projects may encourage tourism and business travel to San Diego, but the presence of the hotel would not result in more people relocating to San Diego. Therefore, the impact on population and housing resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

#### **Proposed Project**

As discussed in Section XIV, *Population and Housing*, the proposed Project would have a less than significant impact on population and housing because it would not substantially induce population growth in the area. Although the proposed Project would create a need for temporary construction workers, the introduction of additional employees would not result in a significant increase in the local population and would not induce substantial population growth because the additional jobs would be filled by residents who currently live in the San Diego region. Therefore, the proposed Project's incremental contribution to cumulative population and housing impacts would not be cumulatively considerable.

#### *Public Services*

The proposed Project would have no impacts related the construction of new or expanded schools and other public facilities. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to either of these issue areas.

The proposed Project would have a less than significant impact related to the construction of new or expanded fire protection, police protection, and park facilities. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these issues. The cumulative study area considered for the public services cumulative analysis includes the service areas for the San Diego Harbor Police Department, SDFRD, and SDPD.

### **Past, Present, and Reasonably Foreseeable Future Projects**

None of the past, present, or reasonably foreseeable cumulative projects would significantly affect public services. Fire and police protection services already provide service to the cumulative study area. The addition of the cumulative projects would not represent a substantial increase in population or the need for substantially more fire or police protection. Moreover, as the population increases in the city as a whole, the City of San Diego will be tasked with providing sufficient fire and police protection pursuant to the City of San Diego's constitutional obligation. Similar to police and fire protection services, park services would not be significantly affected by the cumulative projects. Projects involving parking, demolition, and airport expansion would have little to no effect on parks given the nature of the projects. The hotel projects could increase demand for recreational uses, but would provide several recreational amenities to offset any cumulative impact on park facilities (e.g., Project #4 includes a 1.9-acre public park at the corner of Broadway and Harbor Drive).

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

### **Proposed Project**

As discussed in Section XV, *Public Services*, the proposed Project would have a less than significant impact on public services. Although the proposed Project may result in a modest increase in fire protection, police protection, and park use, the proposed Project would not require new or expanded public service facilities. None of the proposed Project's impacts on public services would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, no physical changes to the environment would occur, and the proposed Project's incremental contribution to cumulative public service impacts would not be cumulatively considerable.

#### *Recreation*

The proposed Project would have less than significant impacts related to the use of parks and other recreational facilities and less than significant impacts with mitigation incorporated for the proposed Project's construction of recreational facilities, including the marina and vessel slips. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to recreational resources. The cumulative study area considered for the recreation cumulative analysis includes the Project site and the area within 0.5 mile of the Project site.

### **Past, Present, and Reasonably Foreseeable Future Projects**

None of the past, present, or reasonably foreseeable cumulative projects would affect recreational resources in a significant and adverse manner. Cumulative projects #3, #4, #11, #14, #16, #18, and #19 would improve recreational resources in the Project site and its surroundings. Therefore, the impact on recreational resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

### **Proposed Project**

The discussion in Section XVI, *Recreation*, includes the potential for increased demand for recreational facilities and the potential to affect existing recreational opportunities. The proposed Project has recreational components (marina, recreational vessel slips, and restaurant) that would be improved or added. Moreover, the proposed Project would not hinder access to the closest recreational facilities (Harbor Island Park and Spanish Landing Park West). Consequently, none of the proposed Project's impacts on recreation would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the proposed Project's incremental contribution to cumulative recreation impacts would not be cumulatively considerable.

### *Transportation*

The proposed Project would have no impact related hazardous design features or incompatible uses, inadequate emergency access, or conflicts with public transit, bicycle, or pedestrian policies, plans, or programs. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to any of these issue areas.

The proposed Project would have less than significant impacts on the congestion management program during Project construction and less than significant impacts related to changes in air traffic patterns; the proposed Project's impact related to construction traffic would be less than significant as well. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these issues. The cumulative study area considered for the transportation and parking cumulative analysis includes the Project site and the area within 0.5 mile of the Project site.

### **Past, Present, and Reasonably Foreseeable Future Projects**

All of the past, present, or reasonably foreseeable cumulative projects would increase traffic to varying degrees. The projects closest to the Project site are the parking plaza at SDIA (#2), Navy Miramar Pipeline Repair and Relocation (#10), Lockheed Martin Company Marine Terminal Demolition Project (#12), and Harbor Island East ~~Basin Industrial Subarea Redevelopment/Topgolf~~ and Port Master Plan Amendment Project (#19) would temporarily increase traffic associated with construction. However, none of these projects would overlap for significant periods of time. In addition, with the exception of Project #19, these projects would result in minimal or no increase in operational traffic. Other projects that include restaurant, hotel, condominium, or apartments would not overlap during construction, but they would result in a permanent increase in operational traffic. As indicated in Section XVII, *Transportation*, there are segments of North Harbor Drive that currently fail with respect to LOS. Therefore, the addition of more traffic from the introduction of new operational land uses would be cumulatively significant. Cumulative impacts on parking, however, are not cumulatively significant. No parking would be needed for several of the cumulative projects, such as #10, #12, and #21. Moreover, several projects include adequate parking, such as #2, #3, and #4.

### **Proposed Project**

The discussion in Section XVII, *Transportation*, notes that proposed Project traffic during the operational phase would be less than the existing traffic at the Project site due to the reduction in building square footage and number of boat slips. Thus, the proposed Project would not contribute to a significant cumulative impact once operational. During the construction phase, Project traffic would temporarily increase by up to 171 ADTs during the peak construction phases from construction workers' commute trips (one trip in and one trip out per worker) and truck haul trips and material deliveries. Overall, the amount of traffic would be relatively small and would occur in the near future (~~summer 2020 to summer 2022~~projected two years of construction), thus avoiding long-term cumulative traffic levels in the Project area. Finally, sufficient parking would be provided for the proposed Project, which would ensure the Project's demand for parking would not contribute to a significant cumulative impact. Consequently, the proposed Project's contribution to significant transportation and parking cumulative impacts would not be cumulatively considerable.

### *Tribal Cultural Resources*

The proposed Project would have less than significant impacts related to tribal cultural resources. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to disturbing tribal cultural resources. The cumulative study area considered for the tribal cultural resources cumulative analysis includes the projects identified on Figure 20.

### **Past, Present, and Reasonably Foreseeable Future Projects**

Projects that propose ground disturbing activities would have the potential to disturb tribal cultural resources, which include most of the projects identified in Table 37. Present and future projects could result in impacts to tribal cultural resources; however, monitoring would likely reduce impacts to less than

significant levels. Therefore, the impact on tribal cultural resources from past, present, and reasonably foreseeable future projects is not cumulatively significant.

### **Proposed Project**

As described in Section XVIII, *Tribal Cultural Resources*, the proposed Project's tribal cultural resources impacts would be limited to the low probability that ground disturbing activities would disturb tribal cultural resources. A review of historic maps shows that the Project area is situated on an artificial landform area created by bay infill and is within a highly developed environment that has been severely disturbed by development; thus, the potential for any buried resources to exist on the Project site is low. Therefore, the proposed Project's incremental cumulative contribution to the cumulative tribal cultural resources impact would not be cumulatively considerable.

### *Utilities and Service Systems*

The proposed Project would not exceed wastewater treatment requirements, require construction of water and wastewater infrastructure that would result in significant impacts on the environment, or conflict with federal, state, and local solid water statutes and regulations. As a result, the proposed Project would not contribute to any potentially significant cumulative impacts related to any of these issue areas.

The proposed Project would have less than significant impacts related to the construction of storm drain facilities, water supply and conservation, adequate wastewater treatment capacity, sufficient landfill capacity, and energy use. Therefore, the cumulative analysis below considers the cumulative impacts of past, present, and probable future projects as they relate to these issues.

The cumulative study area considered for the utilities and service systems cumulative analysis includes the utility service areas of the City of San Diego's Public Utilities Department wastewater branch for wastewater conveyance, the PLWTP for wastewater treatment, the City of San Diego's Public Utilities Department for water conveyance and supply, and the City of San Diego's landfills for solid waste. SDG&E provides electricity and gas service to the Project site and the cumulative study area.

### **Past, Present, and Reasonably Foreseeable Future Projects**

None of the present or reasonably foreseeable cumulative projects would affect utilities in a significant and adverse manner. Although several of the projects at SDIA would expand its current capacity for air travel, the projects have been designed with "green" sustainable measures. Projects within the District's jurisdiction would also improve utility use on-site; however, the projects involving restaurants, hotels, condominiums, and apartments would result in greater utility (water, wastewater, solid waste) and energy use because they would provide visitor-serving uses that do not currently exist. Although several of the cumulative projects would require few additional utilities and be designed to be highly efficient, the introduction of new uses would increase the demand for water, wastewater, solid waste, and energy. Therefore, the impact on utilities from past, present, and reasonably foreseeable future projects is considered cumulatively significant.

### **Proposed Project**

As discussed in Section XIX, *Utilities and Service Systems*, Project operation would not increase utility demands at the Project site. Instead, the proposed Project would upgrade existing utilities to be more energy and water efficient, resulting in less wastewater being produced and less water being consumed. During construction, water use would be required for dust suppression, in accordance with SDAPCD rules; however, the water would be brought in by water truck and would only be required for a few months of construction that is associated with the grading phase. Moreover, little wastewater would be generated during construction as a result of the limited water use during construction and as a result of the water used on-site being absorbed into the soils (from spraying exposed soil for dust control). The use of portable toilets and the stormwater containment measures provided by the SWPPP would ensure that the amount of wastewater generated on-site would be minimal and would not contribute to a cumulative impact. In addition, the proposed Project is anticipated to recycle any concrete material exported off-site during construction as well as wood, steel, glass, aluminum, and other metals. ACM and lead-based paint would



be removed and disposed of in accordance with existing regulations. The proposed Project would generate very small amounts of non-hazardous, non-recyclable solid waste, which would primarily be associated with the additional 37 construction employees. This waste would consist mostly of food and beverage containers from lunch breaks. Consequently, none of the proposed Project's impacts on utilities would be considered significant when considered in connection with cumulative impacts from past, present, and reasonably foreseeable future projects. Therefore, the proposed Project's incremental contribution to utilities and service systems would not be cumulatively considerable.

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

**Less Than Significant Impact with Mitigation Incorporated.** As analyzed in Sections I through XX the proposed Project would not result in potentially significant impacts that could cause substantial adverse effects on human beings, either directly or indirectly. Impacts from air quality and health risk, greenhouse gas emissions and climate change, and noise would all be less than significant and would not cause a substantial adverse effect on humans. Impacts related to geology and soils, hazards and hazardous materials, and water quality and hydrology would also not cause a substantial adverse effect on humans because mitigation measures MM-GEO-1, MM-HAZ-1, and MM-HWQ-1 through MM-HWQ-3 would reduce impacts to less than significant levels.

## Section 5 List of Preparers and Agencies Consulted

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Consistent with State CEQA Guidelines Section 15063 (d) (6), the following section provides a listing of the persons who prepared this Initial Study as well as those persons who contributed project information.

### 5.1 San Diego Unified Port of San Diego

Wileen Manaois - Director, Development Services

Joseph Smith - Department Manager, Development Service

Megan Hamilton - ~~Associate Senior~~ Planner, Development Services

Sean Jones - Asset Manager, Real Estate

Eileen Maher – Director, Environmental Conservation

Paul Brown - Program Manager, Planning & Green Port

### 5.2 CEQA Consultants

Charlie Richmond - Project Director

Elyssa Figari - Project Manager

Megan Swanson - Environmental Planner

Tristan Evert - Senior Environmental Planner

Emily Seklecki - Environmental Planner

Matt McFalls - Air Quality and Greenhouse Gas Specialist

Jonathan Higginson, INCE - Noise Specialist

Laura Rocha - Water Quality Specialist

Tim Yates, Ph.D - Historian

Karen Crawford, MA, RPA - Senior Archaeologist

### 5.3 Technical Consultants

Robert Mooney - Ph.D, Marine Biology

### 5.4 Agencies, Organizations, and Persons Consulted

Agency/Company Name	Contact
San Diego County Regional Airport Authority	Ed Gowens, Senior Airport Planner

## Section 6 References

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### 6.1 Project Description References

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