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Naval Air Station North Island

Draft Environmental Impact Report for the Naval Air Station North Island Airport Land Use Compatibility Plan

Prepared for:

Airport Land Use Commission,
San Diego County Regional Airport Authority

Prepared by:

RICONDO

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1. EXECUTIVE SUMMARY

1.1 INTRODUCTION

Consistent with the California Environmental Quality Act¹ (CEQA) and the CEQA Guidelines,² this Draft Environmental Impact Report (Draft EIR or DEIR) evaluates the environmental effects of adopting the proposed Airport Land Use Compatibility Plan (ALUCP) for Naval Air Station North Island (NASNI or the Airport). This Draft EIR has been prepared by the San Diego County Regional Airport Authority (SDCRAA or the Airport Authority), which serves as the Airport Land Use Commission (ALUC) for San Diego County.

An Initial Study was completed in April 2019. The Initial Study concluded that potentially significant impacts related to the potential displacement of possible future development could be caused for one CEQA resource category: land use and planning.³ Potentially significant impacts were found due to the limits on hotel/resort development in the H-M – Hotel-Motel zoning district. Other impacts, which were considered less than significant, were found due to limits on potential residential development, nonresidential floor area expansion, and the development of new incompatible nonresidential land uses.

This Draft EIR evaluates the potential impacts on land use and planning. The potential impacts are summarized in Section 1.6.1 of this Executive Summary.

The Airport Authority circulated a Notice of Preparation and Initial Study (NOP/IS) on April 22, 2019 to interested public agencies, organizations, community groups and the general public. The Airport Authority also held a public scoping meeting on May 6, 2019 to describe the proposed project and to obtain public input on the scope and content of the Draft EIR. The 30-day scoping period closed on May 22, 2019. Scoping comments were received from one tribal government, one state agency, three local government agencies, and one individual. The CEQA-related comments included suggestions for the consideration of alternatives to the proposed ALUCP and for further analysis of various environmental impacts. Other comments suggested revisions to future land use mapping and the description of some public facilities.⁴ Where appropriate, CEQA-related comments have been addressed in this Draft EIR.

1.2 PURPOSE OF THE DRAFT EIR

According to CEQA and the CEQA Guidelines, public agencies must avoid or substantially lessen significant environmental impacts where feasible. Where impacts cannot be mitigated to less-than-significant levels, public agencies have an obligation to balance the project's significant environmental impacts against other factors, including economic, social, technological, legal, and other benefits.⁵

Because the Initial Study determined that the proposed ALUCP may have a significant impact on the environment, SDCRAA is required by CEQA to prepare an EIR. SDCRAA has undertaken this Draft EIR for the following purposes:

¹ California Public Resources Code §§ 21000 et seq.

² Title 14 California Code of Regulations §§ 15000 et seq.

³ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, pp. 4-19 – 4-32.

⁴ Scoping comments are included in Appendix C, *Documentation of EIR Scoping Period*, Section C.6, of this Draft EIR.

⁵ Title 14 California Code of Regulations § 15021.

- To evaluate the potentially significant land use and planning impacts associated with the implementation of the proposed ALUCP, as required by CEQA
- To determine whether and how any significant environmental impacts can be avoided or lessened through mitigation measures
- To identify any significant and unavoidable impacts that cannot be mitigated
- To identify reasonable and feasible alternatives to the proposed ALUCP or specific ALUCP policies and standards that would eliminate or reduce to less-than-significant levels any significant environmental impacts
- To inform the general public, the local community, and responsible agencies of the nature of the proposed ALUCP, its potentially significant environmental impacts (if any), feasible measures to mitigate those impacts, and reasonable and feasible alternatives
- To enable SDCRAA, in its role as the ALUC for San Diego County, to consider the environmental impacts of the ALUCP and make findings regarding each significant effect that is identified when deciding whether to certify the EIR and approve the proposed ALUCP⁶

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and good faith effort at full disclosure.⁷

1.3 LEAD AGENCY

The "lead agency" is the "public agency which has the principal responsibility for carrying out or approving a project."⁸ SDCRAA, acting in its capacity as the ALUC, is the lead agency for the proposed project and is responsible for complying with the requirements of CEQA and the CEQA Guidelines.

1.4 SUMMARY OF THE PROPOSED PROJECT

State law requires the preparation and adoption of ALUCPs for each public-use and military airport in California. According to the statute, "[i]t is the purpose of this article to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."⁹

⁶ California Public Resources Code §21061; also see Sections 2.1.2 and 2.1.3 of this Draft EIR for additional information about ALUCs and the Authority.

⁷ Title 14 California Code of Regulations § 15151.

⁸ Title 14 California Code of Regulations § 15367; California Public Resources Code § 21067.

⁹ California Public Utilities Code §21670(a)(2).

The proposed ALUCP for NASNI was prepared by the Airport Authority, acting in its capacity as the ALUC for San Diego County. As required by state law, the proposed ALUCP is consistent with the safety and noise standards in the 2011 Air Installations Compatible Use Zones (AICUZ) study, prepared by the United States Navy for NASNI.¹⁰ As recommended in the California Department of Transportation (Caltrans) *Airport Land Use Planning Handbook* (the Caltrans Handbook),¹¹ the proposed ALUCP provides airport land use compatibility policies and standards pertaining to four airport-related compatibility factors: (1) noise, (2) safety, (3) airspace protection, and (4) overflight. The policies and standards would apply within the defined Airport Influence Area (AIA) which is the jurisdictional boundary of the ALUC, but limitations on incompatible land uses and the density and intensity of proposed development would only apply to the smaller Project Area (bounded by the airspace protection area). In the portion of the AIA outside the Project Area, only the overflight notification policy would apply. That policy would not involve any limits on land uses or the density or intensity of development. (The boundaries of the AIA and the Project Area are depicted on Exhibit 2-3 in Section 2.)

The policies of the proposed ALUCP would not apply to federal, state, and tribal lands, including NASNI itself, as the ALUC does not have jurisdiction over those lands.

The proposed ALUCP is a land use planning document and is not a physical project. Local agencies with jurisdiction in the Project Area and which may be subject to ALUCP policies and standards include the cities of Chula Vista, Coronado, National City, and San Diego; Metropolitan Water District; South Bay Irrigation District; San Diego Unified Port District; Chula Vista Elementary School District; Coronado Unified School District; National School District; San Diego Community College District; San Diego Unified School District; Southeastern Community College District; and Sweetwater Union High School District.

The agencies with land use planning and regulatory jurisdiction within the AIA are obligated by state law to amend their general plans, community plans, specific plans and zoning ordinances, as needed, to be consistent with the ALUCP.¹² Alternatively, local agencies may take steps, provided by law, to overrule part or all of the ALUCP as it relates to their jurisdiction.¹³

Areas currently within the boundaries of the safety zones and 65 decibel (dB) Community Noise Equivalent Level (CNEL) and higher noise contours (known as the Area of Potential Impact) are located in the city of Coronado and a small portion of the city of San Diego on Shelter Island which is under the land use authority of the San Diego Unified Port District.¹⁴ The land use planning framework within the Area of Potential Impact is comprised of the City of Coronado General Plan, City of Coronado Zoning Code, the Orange Avenue Corridor Specific Plan, the Coronado Historic Resource Code, and the Port Master Plan.

¹⁰ California Public Utilities Code §21675(b).

¹¹ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. xi and 4-1 – 4-46.

¹² California Public Utilities Code §§ 21676(a) and (b).

¹³ California Public Utilities Code §§ 21675.1(d), 21676(a) and (b).

¹⁴ The Area of Potential Impact (the area within safety zones and the 65 dB CNEL and higher contours) is depicted on Exhibit 2-4 in Section 2.

1.4.1 NASNI AICUZ STUDY

The AICUZ update for NASNI and Naval Outlying Landing Field Imperial Beach (NOLF IB) was published in 2011 by the Naval Facilities Command Southwest (NAVFAC SW).¹⁵ The goal of the AICUZ program is to protect the health, safety, and welfare of populations living on or near military airfields while concurrently preserving the operational viability of the airfield by providing land use compatibility planning guidance to local agencies in the airport environs. The AICUZ defines noise and safety zones with corresponding compatibility guidelines. According to state law, the ALUCP must be consistent with the noise and safety standards of the AICUZ.¹⁶

The AICUZ noise zones are based on modeled CNEL contours. Two sets of CNEL contours were modeled. A baseline scenario was developed from a seven-year average (2003-2009) of total annual aircraft operations at NASNI. A prospective future scenario (2020) was also developed to reflect anticipated operational levels at NASNI, as presented in Exhibit 3-7 in Section 3. The prospective future contours were the basis for the AICUZ noise zones where the noise compatibility guidelines apply.

The AICUZ safety guidelines are applicable in clear zones and accident potential zones which were developed for each runway end and helicopter landing pad at NASNI. Each runway and helicopter landing pad has a Clear Zone (CZ). Runway 29 has two accident potential zones (APZ I and APZ II) extending beyond the CZ. Only the CZ and APZs off the approach end of Runway 29 extend off NASNI property and onto land within the jurisdiction of the City of Coronado. All other Clear Zones are confined to NASNI property, San Diego Bay, or the Pacific Ocean. (See Exhibit 3-8 in Section 3.)

Recognizing that the area within the AICUZ noise contours and safety zones is already developed with urban land uses, the AICUZ advises that "local governments should encourage fair disclosure to the public of the noise and APZ situation, and not take actions that would make an existing land use compatibility (or incompatibility) situation worse (for example by allowing increased densities in redevelopment of currently low density incompatible land uses)."¹⁷

The U.S. Navy is planning a conversion from C-2A Greyhound fixed-wing aircraft to CMV-22B Osprey tilt-rotor aircraft starting in 2020 and finishing by 2028. The Environmental Assessment (EA) for the proposed project evaluated two action alternatives. Alternative 1 would increase the aircraft based at NASNI from 10 C-2As to 23 CMV-22Bs. Alternative 2 would increase the number of based CMV-22Bs to 18 aircraft.¹⁸ The EA concluded that no

¹⁵ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011.

¹⁶ California Public Utilities Code §21675(b).

¹⁷ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

¹⁸ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-1.

significant environmental impacts would occur with either of the two alternatives.¹⁹ No changes to the AICUZ study, prepared in 2011, would be required.²⁰

1.4.2 OBJECTIVES OF THE PROPOSED ALUCP

The proposed ALUCP is intended to promote compatibility between NASNI and surrounding land uses for the protection of public health, safety, and welfare in areas around NASNI, to the extent that these areas are not already devoted to incompatible uses. The goals and objectives of the airport land use compatibility policies are as follows:

1. Promote the compatibility of land uses within noise contours by:
 - a) Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility;
 - b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards;
2. Protect public safety by:
 - a) Limiting new risk-sensitive land uses within safety zones;
 - b) Avoiding an increase in existing land use incompatibility within the safety zones;
3. Protect NASNI airspace and the safety of flight by:
 - a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards;
 - b) Limiting potential hazards to flight within the airspace protection boundary;
4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA.

1.4.3 NOISE COMPATIBILITY POLICIES AND STANDARDS

The proposed ALUCP noise compatibility policies and standards would apply within the 65 dB CNEL and higher contours defined in the 2011 AICUZ study. The noise contours are mapped as CNEL contours, representing the cumulative 24-hour, time-weighted noise level, in decibels, for an average day based on the operational parameters projected for NASNI in the 2011 AICUZ study. As presented in Exhibit 3-7 in Section 3, the CNEL contours are mapped in 5 dB increments from 65 dB CNEL to 75 dB CNEL. Most of the area within the noise contours extends over San Diego Bay and the Pacific Ocean. Exhibit 2-4 in Section 2 of this EIR depicts the land areas covered by the noise contours, which include parts of the cities of Coronado and San Diego, and where the proposed ALUCP noise compatibility policies and standards apply.

¹⁹ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, pp. ES-5 – ES-13. Department of Defense; Department of the Navy, *Finding of No Significant Impact for the Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers – Naval Air Station North Island, California, and Naval Station Norfolk, Virginia*, November 15, 2018.

²⁰ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-6.

The noise compatibility policies and standards are designed to avoid, where possible, the establishment of new noise-sensitive land uses within the 65 dB CNEL and higher noise contours and to ensure that any new noise-sensitive uses are treated to attenuate noise from aircraft to acceptable interior levels. The noise compatibility standards are incorporated into a table that also includes safety compatibility standards, presented in Table 2-2 in Section 2 of this EIR.

1.4.4 SAFETY COMPATIBILITY POLICIES AND STANDARDS

The safety compatibility policies and standards are designed to minimize the consequences associated with an off-airport aircraft accident or emergency landing. The proposed ALUCP defines three safety zones, in accordance with the 2011 AICUZ study – Clear Zone (CZ), Accident Potential Zone I (APZ I), and Accident Potential Zone II (APZ II). The AICUZ safety zones are depicted on Exhibit 3-8 in Section 3 of this EIR. The proposed ALUCP safety zones, which are consistent with the AICUZ safety zones, are depicted over land areas on Exhibit 2-4 in Section 2 of this EIR.

The safety compatibility policies and standards of the proposed ALUCP, presented in Table 2-2 in Section 2 of this EIR, indicate whether new development would be compatible or incompatible within each safety zone. Compatible land uses are divided into two categories – (1) those that are compatible without any special standards, and (2) those that are compatible subject to special standards limiting the density (dwelling units per acre) or intensity (gross floor area) of new development. Incompatible land uses generally include those serving vulnerable occupants (e.g., people with limited effective mobility such as seniors, hospital patients, children requiring supervision, the infirm, etc.) and uses with hazardous materials or large concentrations of people.

1.4.5 AIRSPACE PROTECTION AND FLIGHT SAFETY POLICIES AND STANDARDS

The airspace protection and flight safety policies and standards are designed to avoid the development of structures or objects and certain land use characteristics that would cause hazards to aircraft in flight within the vicinity of NASNI. The proposed ALUCP includes maps of airspace protection surfaces for NASNI that are defined by a combination of the Part 77, Subpart B, airport vicinity notification surfaces and the inner Part 77, Subpart C, airport obstruction surfaces.²¹ The proposed ALUCP includes policies that are consistent with the AICUZ recommendations²² and would facilitate compliance with federal and state regulations relating to the protection of airspace.

The proposed ALUCP also includes standards to avoid the creation of other hazards to flight (e.g., features creating wildlife hazards, particularly bird strikes); and land use characteristics that could create turbulence off the runway ends or cause visual or electronic interference with aircraft and air traffic control navigational or communications equipment.

1.4.6 OVERFLIGHT NOTIFICATION POLICY

The overflight notification policy recognizes that many people are sensitive to the frequent presence of aircraft over their homes and may experience annoyance, whether noise levels are high or low. The proposed ALUCP calls for local agencies to provide a means for prospective buyers of dwelling units to be notified of the potential effects of aircraft overflight in the area. This buyer awareness measure is intended to enable individuals to make more

²¹ 14 CFR Part 77. Refer to the AICUZ study for more information about airspace surfaces. The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Section 5.1.

²² The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, pp. 5-1 – 5-4.

informed decisions when purchasing or leasing residential property that is located within the overflight notification area.

1.5 ORGANIZATION OF THIS DRAFT EIR

This Draft EIR, which has been prepared in accordance with CEQA requirements, is organized into seven sections:

- Section 1, Executive Summary, highlights the main components of the proposed project, the findings of the environmental impact analysis and alternatives that were considered.
- Section 2, Project Description, contains a description of the proposed project, including an overview of the ALUC's role and the airport land use compatibility planning process.
- Section 3, Environmental Setting, discusses existing physical conditions in the Project Area, including existing land use and an overview of the existing regulatory setting.
- Section 4, Environmental Impacts, contains the impact analysis and specifically considers the environmental impacts on land use and planning that would result from the proposed ALUCP. Other effects of the proposed project are also considered, including whether the proposed project would result in significant irreversible environmental changes, significant unavoidable effects, growth-inducing effects, and potential cumulative impacts.
- Section 5, Alternatives, identifies and evaluates alternatives to the proposed ALUCP, the environmental impacts of those alternatives, and whether the alternatives would meet the project objectives.
- Section 6, Preparers and Organizations and Persons Consulted, identifies the people who prepared this Draft EIR and their organizational affiliations. Any organizations and persons consulted in preparing this Draft EIR are also identified.
- Section 7, References and Acronyms identifies the documents relied upon and cited in this Draft EIR, as well as acronyms used in this Draft EIR.
- This Draft EIR is supplemented by the following appendices:
 - Appendix A, Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study. This is the Initial Study released in April 2019. It determined that the proposed ALUCP may result in potentially significant impacts on land use and planning. It concluded that the proposed ALUCP would not result in potentially significant impacts to any other environmental resource categories.
 - Appendix B, Revised Analysis of Potentially Displaced Development – Hotel del Coronado. This analyzes the potential impact of the proposed ALUCP on the long-term development potential of the Hotel del Coronado property. At the EIR Scoping Meeting held on May 6, 2019, representatives of the Hotel del Coronado pointed out to the ALUC's consultant some discrepancies in the reporting of the land area of the hotel property and the gross floor area of development called for in the 2010 Hotel del Coronado Amended Master Plan for the resort. It was found that the consultant's figures had not accounted for final adjustments in the plan required by the California Coastal Commission.²³ While these discrepancies were small (overestimation of approximately 7,000 square feet of gross floor area and 0.1 acre of property area), the consultant undertook a thorough review of the California Coastal Commission's record of review and

²³ California Coastal Commission, Staff Report and Recommendation on Appeal, Appeal No.: A-6-COR-08-98 & A-6-COR-08-99, September 28, 2010, page 2.

approval of the Hotel del Coronado Amended Master Plan to find other factors that needed to be addressed in a revised analysis of potential development displacement. This appendix provides the revised analysis.

- Appendix C, Documentation of EIR Scoping Period. This includes the Notice of Preparation of the EIR, meeting advertisements and notices, news releases and articles, the scoping meeting presentation, the scoping meeting transcript, and written comments received during the scoping period.
- Appendix D, Corrections to Initial Study Analysis of Potentially Displaced Development. This appendix documents corrections made to the analysis of potentially displaced development after the release of the Initial Study in April 2019.

1.6 SUMMARY OF ENVIRONMENTAL IMPACTS

The Initial Study (Appendix A) considered the potential impact of the proposed ALUCP on all CEQA resource categories.²⁴ **Table 1-1** summarizes the findings of the Initial Study. The potential for a significant impact was found for only one CEQA category – land use and planning.

TABLE 1-1 SUMMARY OF INITIAL STUDY FINDINGS

| CEQA CATEGORY | POTENTIAL SIGNIFICANT IMPACT | LESS THAN SIGNIFICANT IMPACT | NO IMPACT |
|------------------------------------|------------------------------|------------------------------|-----------|
| Aesthetics | | ● | |
| Agriculture and Forestry Resources | | | ● |
| Air Quality | | ● | |
| Biological Resources | | ● | |
| Cultural Resources | | ● | |
| Energy | | ● | |
| Geology and Soils | | ● | |
| Greenhouse Gas Emissions | | ● | |
| Hazards and Hazardous Materials | | ● | |
| Hydrology and Water Quality | | ● | |
| Land Use and Planning | ● | | |
| Mineral Resources | | ● | |
| Noise | | ● | |
| Population and Housing | | ● | |
| Public Services | | ● | |
| Recreation | | ● | |
| Transportation | | ● | |
| Tribal Cultural Resources | | ● | |
| Utilities and Service Systems | | ● | |
| Wildfire | | ● | |

SOURCE: Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019, pp. 4-1 – 4-47.

1.6.1 POTENTIAL LAND USE AND PLANNING IMPACTS

Environmental impacts of the proposed ALUCP are discussed in Section 4 of this Draft EIR. Based on a review of the City of Coronado General Plan, Coronado Zoning Code, the Orange Avenue Corridor Specific Plan, Coronado

²⁴ Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019. The Initial Study is included in this EIR as Appendix A.

Historic Resources Code, and the Port Master Plan, this Draft EIR concludes that the proposed ALUCP may result in significant impacts on land use and planning, particularly with respect to areas in Coronado zoned H-M – Hotel-Motel.

The policies and standards of the proposed ALUCP would limit future development within the ALUCP Area of Potential Impact (the area within the noise contours and safety zones) in the following ways:

1. By limiting increases in the density (dwelling units per acre) of residential development;²⁵
2. By limiting increases in the intensity of nonresidential development, in terms of gross floor area; and
3. By designating the new development of certain land uses as incompatible.

Potential impacts on land use and planning would be confined to the City of Coronado. The noise and safety policies and standards of the proposed ALUCP would apply to 14.1 percent of the nonfederal land in Coronado. Implementation of the proposed ALUCP, which would require amendments to the City's Zoning Code, would potentially result in land use impacts. Alternatively, the City could overrule the ALUCP policies according to law.²⁶

1.6.1.1 NEW RESIDENTIAL DEVELOPMENT AND EXPANSION OF EXISTING NONRESIDENTIAL DEVELOPMENT

Table 1-2 summarizes the impact of the proposed ALUCP on potential new residential development and expansion of existing nonresidential development in Coronado.²⁷ The “displaced development” represents development that is currently permissible under Coronado’s Zoning Code that would become incompatible with implementation of the proposed ALUCP.

As previously noted, the impact on potential expansion of hotel/resort areas, which are zoned H-M – Hotel-Motel, are considered potentially significant for the following reasons:

- Of the H-M – Hotel-Motel-zoned area in the city, 52 percent is within the safety zones and is subject to limits on the expansion of nonresidential floor area;
- Assuming adherence to the approved Amended Master Plan for the Hotel del Coronado, the proposed ALUCP could potentially result in the displacement of 38,023 square feet of additional development on the Hotel del Coronado property, equating to 3.8 percent of the total potential gross floor area of the Hotel del Coronado (996,586 square feet) provided for in the approved Amended Master Plan.²⁸

²⁵ The development of accessory dwelling units, as defined by state law, would be compatible with the proposed ALUCP.

²⁶ California Public Utilities Code §§ 21675.1(d), 21676(a) and (b).

²⁷ Implementation of the proposed ALUCP would limit the development of additional residential units to avoid an increase existing densities (dwelling units per acre). The ALUCP would impose no limits on the expansion of habitable area in existing dwelling units, provided that interior sound level standards were achieved for expansions of 50 percent or more of the original habitable area. See Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan*, draft, November 2019, Tables 3 and 4.

²⁸ This is the remaining development capacity estimated to exist on the Hotel del Coronado property after build-out of the Amended Master Plan. Appendix B, *Revised Analysis of Potentially Displaced Development – Hotel del Coronado*, Table B-3.

Another consideration is that the Coronado Zoning Code would allow the expansion of buildings on the Hotel del Coronado site to a maximum floor area ratio (FAR) of 1.8.²⁹ Thus, according to existing zoning, the building floor area could be allowed to expand to 2,204,832 square feet – an increase of 1,246,269 square feet more than the 958,563 square feet proposed in the Amended Master Plan. Given the historic status of the Hotel del Coronado, the presence of a geologic fault zone, and the location of the property in the Coastal Zone, it is difficult to envision maximum development of the site as a realistic possibility. Nonetheless, based on current zoning, the Hotel del Coronado site has additional development capacity, some of which could be tapped in the long-range future without implementation of the proposed ALUCP.

TABLE 1-2 SUMMARY OF IMPACT OF PROPOSED ALUCP ON POTENTIAL NEW RESIDENTIAL DEVELOPMENT AND EXPANSION OF NONRESIDENTIAL DEVELOPMENT IN CORONADO

| LAND USE | POTENTIAL DEVELOPMENT DISPLACEMENT WITH ALUCP | |
|-----------------------------|---|-----------------------------------|
| | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) |
| Single-Family Residential | 28 | – |
| Multiple-Family Residential | 8 | – |
| Commercial | – | 3,850 to 25,550 |
| Hotel/Resort | – | 38,023 ¹ |
| Totals | 36 | 41,873 to 63,573 |

NOTE:

1 This is considered the practical maximum amount of potential gross floor area displacement assuming that the Hotel del Coronado remains substantially as-is, in conformance with the 2011 Amended Master Plan. Based on current zoning, which allows a maximum floor area ratio (FAR) of 1.8, complete redevelopment of the Hotel del Coronado property could yield a gross floor area of 2,204,832 square feet, 1,246,269 square feet more than proposed in the 2011 Amended Master Plan.

SOURCE: Ricondo & Associates, Inc., June 2019.

The impacts on the residential and commercial land use categories are considered less than significant for the following reasons:

- Large proportions of residential and commercial-zoned areas of Coronado are outside the safety zones where potentially displaced residential and commercial development could be accommodated (approximately 85 percent of the single-family zoned area, 96 percent of the multiple-family-zoned area, and 96 percent of the commercial-zoned area in Coronado is outside the safety zones).³⁰
- The amount of potentially displaced residential development (36 units) is small relative to the total number of dwelling units in the city (9,634 in 2010).³¹
- The housing opportunity sites designated in the current Coronado Housing Element are all outside the safety zones, so implementation of the ALUCP would not adversely impact achievement of the City's regional housing needs assessment (RHNA) goals through 2020.³²
- The area within the safety zones is fully developed with urban land uses. Buildings and grounds are well cared for and present a prosperous appearance with no signs of blight. Signs that often indicate a market ripe for

²⁹ City of Coronado, Coronado Municipal Code, Title 86, Zoning, §86.32.110. A special use permit is required for development exceeding a FAR of 1.8.

³⁰ Derived from information provided in Table 4-12 in Section 4 of this EIR.

³¹ See Section 4.2.4.7 of this EIR.

³² *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 81. Also, see Section 4.2.4.7 of this EIR. The City has a RHNA goal of 50 units through 2020.

redevelopment, such as deteriorated properties or obviously low-value properties in the midst of new high-value properties, are absent from the area. Thus, the potential redevelopment of land in the safety zones, without implementation of the ALUCP, is considered speculative, as is the potential impact of the ALUCP on limiting such development.

1.6.1.2 INCOMPATIBLE NONRESIDENTIAL LAND USES

In addition to limiting new residential development and expanded nonresidential development in the proposed ALUCP safety zones, the ALUCP would limit the development of new incompatible nonresidential land uses. The Coronado Zoning Code allows the development of various places of public assembly in all zoning districts within the proposed ALUCP safety zones.³³ Under the proposed ALUCP, these uses are considered incompatible in the safety zones because they serve vulnerable occupants, involve large concentrations of people, or include sleeping areas.³⁴ Although all property within the safety zones is developed, the potential exists for redevelopment of some properties for these incompatible uses based on existing Coronado zoning.

Table 1-3 notes the amount of land and existing floor area that would be unavailable for the development of incompatible nonresidential land uses with implementation of the proposed ALUCP. These impacts are considered less than significant for the following reasons:

- The Area of Potential Impact (the area within the noise contours and safety zones) is small relative to the rest of Coronado where development of these incompatible uses could be accommodated (14.1 percent of the nonfederal land in Coronado is within the Area of Potential Impact);³⁵
- The market demand for (or economic feasibility of) the incompatible institutional and public service uses is limited, as indicated by the relative scarcity of these uses throughout Coronado. The numbers of these uses that currently occur in Coronado are as follows: ³⁶
 - Child day care centers, nurseries, preschools (not including in-home facilities) – 5
 - K-12 schools – 10
 - Trade schools – 1
 - Colleges, universities – 0
 - Places of religious assembly – 10
 - Places of public fraternal assembly – 5
- The Area of Potential Impact is fully developed with urban land uses and shows no signs of being suitable for redevelopment or land use change. Thus, the potential redevelopment of land in the Area of Potential Impact, without implementation of the ALUCP, is considered speculative, as is the potential impact of the ALUCP on limiting such development.

³³ In residential zones, development of these uses is subject to the issuance of major special use permits. Coronado Municipal Code, Title 86, Zoning, Section 86.55.120.

³⁴ One of these uses, light manufacturing, involves potentially hazardous materials. Also, see Table 2-2 in Section 2 of this EIR.

³⁵ See Table 4-11 in Section 4.2.4.7 of this EIR.

³⁶ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019, Appendix A, Attachment A.

- While the ALUCP limitation on incompatible nonresidential land uses in the safety zones conflicts with Coronado zoning, the limitations on some of those incompatible land uses is consistent with the City's General Plan Noise Element. The following land uses, all of which are considered incompatible in the proposed ALUCP, are described in the Noise Element as "normally unacceptable" in areas exposed to noise above 65 dB CNEL:³⁷
 - Child day care centers, nurseries, preschools (not including in-home facilities)
 - K-12 schools
 - Trade schools
 - Colleges, universities
 - Places of religious assembly

TABLE 1-3 POTENTIAL DISPLACEMENT OF NEW INCOMPATIBLE NONRESIDENTIAL LAND USES WITH ALUCP

| LAND USE | POTENTIAL DISPLACEMENT WITH ALUCP | |
|---|---|--|
| | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) ¹ | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² |
| Child Day Care Centers, Nurseries, Preschools ³ | 23,759 ⁴ | 424,212 |
| K-12 Schools ³ | 23,759 ⁴ | 54,719 |
| Trade Schools ³ | 23,759 ⁴ | 445,714 |
| Colleges and Universities (classrooms) ³ | 23,759 ⁴ | 0 |
| Places of Religious Assembly ³ | 23,759 ⁴ | 54,719 |
| Places of Public/Fraternal Assembly | 23,759 ⁴ | 207,101 |
| Hotels, Motels | 0 | 22,605 |
| Light Manufacturing (textiles, clothing, precision instruments) | 0 | 22,605 |
| Theaters | 23,759 ⁴ | 22,605 |
| Totals | 0 to 23,759⁵ | 0 to 445,714⁵ |

NOTES:

- 1 Includes only leasable floor area on the upper floors of two commercial buildings, one of which is on a parcel that is considered potentially developable and is also considered in the column to the right.
- 2 Includes the total parcel area subject to potential displacement, rather than estimated floor area of potentially displaced development.
- 3 The Noise Element of the General Plan considers these uses as "normally unacceptable" in areas exposed to noise above 65 dB CNEL. All parts of Coronado within the ALUCP safety zones are also within the NASNI 65 dB CNEL contour.
- 4 Includes 20,479 square feet of floor area on the upper floors of Coronado Plaza (map ID 43 on Exhibit 4-9) and 3,280 square feet of floor area on the second floor of the building at the corner of Loma and Orange Avenues (map ID 42 on Exhibit 4-9).
- 5 The data listed in these columns includes many of the same parcels, so the data cannot be validly summed. The "totals" represent the total leasable area or parcel area involved for each measure of displaced development noted in the corresponding column.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-2.

1.6.2 ALTERNATIVES CONSIDERED

CEQA requires that an EIR must describe and evaluate a reasonable range of potentially feasible alternatives to the proposed project that could attain most of the basic project objectives and avoid or substantially lessen any

³⁷ As depicted on Exhibit 2-4 in Section 2, the 65 dB CNEL and higher noise contours lie entirely within the ALUCP safety zones.

potentially significant environmental impacts associated with the proposed project.³⁸ Consistent with these CEQA requirements, three alternatives were considered and evaluated.

Two other alternatives, which were determined not to be feasible, are discussed in Section 5. They involve (1) the elimination of the sound attenuation standards of the proposed ALUCP, and (2) adoption of the AICUZ land use compatibility guidelines presented in Appendix C of the AICUZ study.

Elimination of the sound attenuation standards was not considered feasible because it would directly conflict with Objective 1(b) of the proposed ALUCP and with the AICUZ³⁹ (and, by implication, with Public Utilities Code Section 21674.7), and it would not reduce the environmental impacts of the proposed ALUCP.

Adoption of the AICUZ land use compatibility guidelines was considered infeasible because it would result in virtually all existing development in the Coronado portion of the safety zones and noise contours being incompatible. Thus, it would result in far greater environmental impacts than the proposed ALUCP.

1.6.2.1 ALTERNATIVE 1 – NO PROJECT

CEQA requires evaluation of the no-project alternative.⁴⁰ Where the proposed project is the "revision of an existing land use or regulatory plan, the 'no project' alternative will be the continuation of the existing plan into the future."⁴¹ Therefore, the "projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."⁴²

Because no ALUCP has ever been adopted for NASNI, the No-Project alternative would involve the continuation of the General Plan policies and Zoning Code provisions in the Area of Potential Impact (the area within the safety zones and noise contours). While the No-Project alternative would avoid the potentially significant environmental impact of the proposed ALUCP, the No-Project alternative would fail to fully achieve the project objectives of the ALUCP, noted in Section 1.4.2. Most importantly, the No-Project alternative would fail to comply with state law mandating the adoption of an ALUCP for NASNI [PUC Section 21675(a)] and to ensure that the ALUCP is consistent with the noise and safety standards of the AICUZ prepared for NASNI [PUC Section 21675(b)].

1.6.2.2 ALTERNATIVE 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES

Alternative 2 would eliminate the proposed ALUCP's limits on increases in residential density and increases in nonresidential intensity (gross floor area) in the safety zones. Thus, this alternative would enable increases in residential development density and nonresidential floor area up to the maximums allowed under current zoning,⁴³ reducing the environmental impacts of the proposed ALUCP. At the same time, however, this alternative would fail to achieve the objectives of the ALUCP described in Section 1.4.2, as follows:

³⁸ Title 14 California Code of Regulations § 15126.6(a).

³⁹ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

⁴⁰ Title 14 California Code of Regulations § 15126.6(e)(1).

⁴¹ Title 14 California Code of Regulations § 15126.6(e)(3)(a).

⁴² Title 14 California Code of Regulations § 15126.6(e)(3)(a).

⁴³ Changes in General Plan land use designations and rezonings to increase residential density and nonresidential intensity above the maximums allowed under current zoning would continue to be considered incompatible.

- It would fail to limit new noise-sensitive development within the 65 dB CNEL and higher noise contours [Objective 1(a)].
- It would fail to limit the potential development of new risk-sensitive land uses within the safety zones [Objective 2(a)].
- It would fail to avoid an increase in existing land use incompatibility within the safety zones [Objective 2(b)].

By failing to avoid an increase in land use incompatibility in the safety zones, this alternative would be inconsistent with the AICUZ recommendation to avoid making “an existing land use compatibility (or incompatibility) situation worse.”⁴⁴ In failing to be consistent with the AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.⁴⁵

1.6.2.3 ALTERNATIVE 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES

Alternative 3 would apply the noise and safety standards of each noise contour range and safety zone only to parcels that are sited completely within a given noise contour range and/or safety zone. Parcels that are split by those boundaries would have to comply with the standards of the less restrictive noise contour range or safety zone. Parcels that are split by the 65 dB CNEL contour would not be subject to any noise standards. Parcels that are partially inside a safety zone and partially outside any other safety zone would not be subject to any safety standards. By effectively excluding properties from complying with the 65 dB CNEL contour and safety zone compatibility standards, this alternative would implicitly reduce the size of the noise contours and safety zones, which the ALUC has no jurisdiction to modify. It also would fail to achieve key project objectives, as follows:

- It would fail to limit new noise-sensitive development within the 65 dB CNEL contour [Objective 1(a)].
- By effectively removing approximately 14 residentially zoned lots from the 65 dB CNEL contour, it would increase the number of noise-sensitive land uses that could be expanded (and new accessory dwelling units that could be built) without being treated to reduce interior sound levels [Objective 1(b)].
- By effectively removing 17 lots from the safety zones, it would fail to limit new risk-sensitive development in the safety zones [Objective 2(a)].
- By removing 17 lots from the safety zones, it would fail to limit an increase in new land use incompatibility in the safety zones [Objective 2(b)].

By essentially reducing the size of the noise contours and safety zones and failing to avoid an increase in land use incompatibility in the safety zones, this alternative would be inconsistent with the AICUZ recommendation to avoid making “an existing land use compatibility (or incompatibility) situation worse.”⁴⁶ In failing to be consistent with the

⁴⁴ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

⁴⁵ California Public Utilities Code §21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Caltrans Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

⁴⁶ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.⁴⁷

1.6.3 POTENTIAL MITIGATION MEASURES

While the proposed ALUCP conflicts with the Coronado Zoning Code in some respects, the proposed ALUCP policies and standards reflect the legislative mandate to which the ALUC is subject.⁴⁸ The policies and standards are necessary for the ALUCP to achieve consistency with noise and safety recommendations of the AICUZ study and to avoid making existing land use incompatibility worse. They also reflect guidance and recommendations provided in the Caltrans Handbook.⁴⁹ Thus, any mitigation involving revisions to the ALUCP to relieve those conflicts would be contrary to the goals and objectives of the ALUCP and the State mandate regarding consistency of the ALUCP with the AICUZ noise and safety requirements.⁵⁰

As provided in state law, the responsibility to resolve the conflicts rests with the City of Coronado. The law provides that the City can amend its land use regulations to achieve consistency with the ALUCP or overrule the ALUCP, subject to a two-thirds vote of its city council if it makes specific findings that the City's current land use plans and regulations fulfill the objectives of the ALUC statute.⁵¹ The City also has the authority to make amendments to its General Plan and Zoning Code to allow for any new development that may be displaced from within the ALUCP noise contours and safety zones elsewhere in Coronado.

1.7 TOPICS OF KNOWN CONCERN / AREAS OF CONTROVERSY

In order to determine the scope of the environmental topics to be addressed in this Draft EIR, the Airport Authority prepared a Notice of Preparation and Initial Study (NOP/IS) and circulated the NOP/IS on April 22, 2019 to interested public agencies, organizations, community groups and the general public. In addition, the Airport Authority also held a public scoping meeting on May 6, 2019 to describe the proposed project and to obtain public input on the scope and content of the Draft EIR.

Six comment letters were received in response to the NOP/IS – one from a tribal government, one from a state agency, three from local agencies, and one from an individual. Copies of the letters are in Appendix C.

⁴⁷ California Public Utilities Code §21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Caltrans Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

⁴⁸ California Public Utilities Code §§21670(a)(2), 21674.7(a), 21675(a), 21675(b).

⁴⁹ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-3 – 3-11, 3-26 – 3-36, 3-47 – 3-48, 4-1 – 4-46.

⁵⁰ California Public Utilities Code §§ 21675.1(d), 21676(a) and (b). The statute also includes the following requirements. "At least 45 days prior to the decision to overrule the commission [ALUC], the local agency governing body shall provide the commission and the division [Caltrans Division of Aeronautics] a copy of the proposed decision and findings. The commission and the division may provide comments to the local agency governing body within 30 days of receiving the proposed decision and findings. If the commission or the division's comments are not available within this time limit, the local agency governing body may act without them. The comments by the division or the commission are advisory to the local agency governing body. The local agency governing body shall include comments from the commission and the division in the final decision to overrule the commission, which may only be adopted by a two-thirds vote of the governing body."

⁵¹ California Public Utilities Code §§ 21676(a) and 21676.5.

The City of Coronado was the only commenter raising concerns about the scope of the EIR analysis. The City requested analysis of the following matters:

- Effects of the proposed ALUCP leading to the relocation of residents and the necessity of building replacement housing;
- Indirect effects of the proposed ALUCP on air quality, greenhouse gas emissions, street traffic volumes, energy efficiency, water use efficiency, and disaster preparedness;
- Indirect effects of the proposed ALUCP leading to a potential shift in development to other parts of Coronado;
- Alternatives to the proposed ALUCP that would lessen or avoid significant environmental impacts.

Some comments noted points of confusion in the Initial Study and requested that the EIR include clarifications and map revisions to more accurately reflect the effect of the proposed ALUCP on local agency facilities and land use plans. These included suggestions from the Port District to clarify information on the land use maps of Port lands and from the County of San Diego to clarify the potential applicability of the proposed ALUCP to the County.

Other comments expressed concerns unrelated to the environmental impact of the proposed ALUCP. Some, for example, related to issues that would be of concern for a property development project but not for a land use planning project. Other comments questioned the AICUZ noise analysis and the validity of the AICUZ study as the basis for the proposed ALUCP. One comment questioned a helicopter flight procedure at NASNI.

1.8 DOCUMENTS INCORPORATED BY REFERENCE

The following documents are incorporated by reference into this Draft EIR in accordance with the CEQA Guidelines:⁵²

- The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011.

The AICUZ Study describes NASNI facilities and flight operations. It includes technical analyses explaining the noise exposure contours and the configuration of safety zones prepared for NASNI. It also provides land use compatibility guidance for consideration by local land use planning and regulatory agencies. According to state law, ALUCPs for military airports must be consistent with the noise and safety compatibility standards of the AICUZ.⁵³

- Wyle, Aviation Services, Wyle Report WR10-18: *AICUZ Update Noise Study for Naval Air Station North Island and Outlying Landing Field Imperial Beach, California*, September 2010.

This report documents the aircraft noise analysis undertaken for the NASNI AICUZ Study.

- California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011.

The Caltrans Handbook provides guidance to ALUCs in preparing ALUCPs. It includes suggested noise compatibility policies, safety compatibility policies and criteria, airspace protection policies and overflight policies, including suggestions for the geographic scope of those policies. It also includes guidance for the definition of safety zones. The Caltrans Handbook includes appendices describing applicable laws and technical

⁵² Title 14 California Code of Regulations § 15150.

⁵³ California Public Utilities Code § 21675(b).

analyses that were relied upon in establishing the guidance. The Caltrans Handbook is prepared and periodically updated by the Caltrans Division of Aeronautics, pursuant to statutory directive.⁵⁴ State law requires that ALUCs are to be guided by information provided in the Caltrans Handbook.⁵⁵

Section 7.0, References and Acronyms, provides full citations of studies, reports and documents cited or referred to in this Draft EIR.

⁵⁴ California Public Utilities Code § 21674.5.

⁵⁵ California Public Utilities Code § 21674.7.

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2. PROJECT DESCRIPTION

This section describes the proposed project – the proposed Airport Land Use Compatibility Plan (ALUCP) for Naval Air Station North Island (NASNI or the Airport). It includes sections explaining state airport land use compatibility planning law; the role of the San Diego County Regional Airport Authority (SDCRAA or the Airport Authority) acting as the Airport Land Use Commission (ALUC); the purpose and objectives of the proposed ALUCP; the land use compatibility policies and standards of the proposed ALUCP; and the intended uses of this Draft EIR.

2.1 PROJECT BACKGROUND

2.1.1 AIRPORT LAND USE COMPATIBILITY PLANNING

State law requires the preparation and adoption of ALUCPs for each public-use and military airport in California.¹ According to the statute, "[i]t is the purpose of this article to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."²

2.1.2 AIRPORT LAND USE COMMISSIONS

State law requires the formation of an ALUC in each county containing a public-use or military airport, subject to limited exceptions.³ The legislative findings and declarations set forth in the statute define the goals of the California Legislature and underscore the parameters and limitations of this statutory scheme:⁴

- a) The Legislature hereby finds and declares that
 - 1) It is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports so as to promote the overall goals and objectives of the California airport noise standards adopted pursuant to Public Utilities Code Section 21669 and to prevent the creation of new noise and safety problems.
 - 2) It is the purpose of this article to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.
- b) In order to achieve the purposes of this article, every county in which there is located an airport which is served by a scheduled airline shall establish an ALUC. Every county, in which there is located an airport which is not served by a scheduled airline, but is

¹ California Public Utilities Code § 21670.3, § 21675.

² California Public Utilities Code § 21670(a)(2).

³ California Public Utilities Code §§ 21670 et seq.

⁴ California Public Utilities Code §§ 21670 et seq.

operated for the benefit of the general public, shall establish an airport land use commission...

In order to achieve these statutory goals, the ALUC's responsibilities include:

1. Assisting local agencies with land use planning in order to ensure that land uses in the vicinity of an airport are compatible with airport operations, to the extent the land is not already devoted to incompatible uses;
2. Coordinating planning at the state, regional, and local level, so as to simultaneously provide for the orderly development of air transportation and protection of the public health, safety, and welfare;
3. Preparing and adopting an ALUCP for land surrounding airports within its jurisdiction; and
4. Reviewing the plans, regulations, and certain other actions of local agencies and airport operators to ensure that the proposals are consistent with the adopted ALUCP.⁵

The ALUC is required to formulate an ALUCP that "safeguard[s] the general welfare of the inhabitants within the vicinity of the airport and the public in general."⁶ In order to protect public health, welfare, and safety, the ALUC may design the ALUCP to, for example, place "height restrictions on buildings, specify use of land, and determine building standards, including soundproofing adjacent to airports."⁷ In formulating an ALUCP, the ALUC is required to be "guided by" information in the California Department of Transportation (Caltrans) *California Airport Land Use Planning Handbook* (the Caltrans Handbook).⁸

Although the ALUC has broad land use planning authority in the vicinity of an airport, the California Legislature also limits the scope of ALUC authority. The ALUC has:

- No authority over existing land uses. The ALUC is authorized to prepare prospective land use planning measures relating to future development to foster the "orderly growth" of the airport by protecting against new development that would otherwise encroach upon the airport and be incompatible in areas affected by aeronautical activities associated with the airport.⁹ The statute, however, does not grant ALUCs the power to regulate existing land uses, even if those land uses are incompatible with the airport.¹⁰
- No jurisdiction over federal, state, and tribal lands. While the ALUC must prepare compatibility plans for military airports, the ALUC has no jurisdiction over federal lands that may be adjacent to the military airport.
- No authority or responsibility to operate airports. ALUCs have no jurisdiction over the "operation of airports."¹¹ The authority and responsibility to operate the airport in accordance with local, state, and federal law lies with the airport proprietor.
- Limited jurisdiction on the types of land use actions subject to review. After the affected local agencies have made their general plans and land use regulations consistent with the ALUCP (or otherwise overrule the ALUC's plan), the only actions for which ALUC review would remain mandatory are proposed amendments to general

⁵ California Public Utilities Code § 21674(a), § 21674(d).

⁶ California Public Utilities Code § 21675(a).

⁷ California Public Utilities Code § 21675(a).

⁸ California Public Utilities Code § 21674.7. The latest version of the Caltrans Handbook was published in October 2011.

⁹ California Public Utilities Code § 21675.

¹⁰ California Public Utilities Code § 21674(a).

¹¹ California Public Utilities Code § 21674(e), § 21675(b).

plans, specific plans, zoning ordinances (including zoning map amendments or rezones), and building regulations affecting land development within the Airport Influence Area (AIA).¹²

2.1.3 SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

The San Diego County Regional Airport Authority Act of 2002 created the SDCRAA as a local entity of regional government to:

1. Oversee operation of San Diego International Airport, which had previously been operated by the San Diego Unified Port District
2. Lead the comprehensive planning effort directed at meeting the long-term air transportation service demands of the region
3. Serve as the ALUC for San Diego County¹³

On January 1, 2003, the SDCRAA assumed the ALUC duties from San Diego Association of Governments (SANDAG), which had served as the County's ALUC since December 1970 when the function was first established. On October 5, 2007, Senate Bill No. 10 (SB 10) – the San Diego County Regional Airport Authority Reform Act of 2007 – became law. SB 10 requires the SDCRAA to be responsible for the preparation, adoption, and amendment of an ALUCP for each public-use and military airport in San Diego County and requires the Airport Authority to engage in a public collaborative planning process when preparing and updating the ALUCPs.

2.2 PROJECT OBJECTIVES

The proposed ALUCP for NASNI was prepared by the Airport Authority, acting in its capacity as the ALUC. As required by state law,¹⁴ the proposed ALUCP is consistent with the safety and noise standards in the 2011 Air Installations Compatible Use Zones (AICUZ) study, prepared by the U.S. Navy for NASNI. As recommended in the Caltrans Handbook, the proposed ALUCP provides airport land use compatibility policies pertaining to four airport-related compatibility factors: (1) noise, (2) safety, (3) airspace protection, and (4) overflight.¹⁵

The policies of the proposed ALUCP would not apply to federal, state, and tribal lands, including NASNI itself, as the ALUC does not have jurisdiction over those lands.

The proposed NASNI ALUCP is intended to promote compatibility between NASNI and surrounding land uses for the protection of public health, safety, and welfare in areas around NASNI, to the extent that these areas are not already devoted to incompatible uses.¹⁶ The goals and objectives of the airport land use compatibility policies are to:

¹² California Public Utilities Code § 21676.5(b).

¹³ California Public Utilities Code § 21670.3.

¹⁴ California Public Utilities Code § 21675(b).

¹⁵ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. xi and 4-1 – 4-46.

¹⁶ California Public Utilities Code § 21670(a)(2).

1. Promote the compatibility of land uses within noise contours by:
 - a) Limiting new noise-sensitive development within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) and higher noise contours to avoid an increase in existing land use incompatibility;
 - b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards.
2. Protect public safety by:
 - a) Limiting new risk-sensitive land uses within safety zones;
 - b) Avoiding an increase in existing land use incompatibility within the safety zones.
3. Protect NASNI airspace and the safety of flight by:
 - a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards;
 - b) Limiting potential hazards to flight within the airspace protection boundary.
4. Promote awareness to prospective buyers of new housing of the potential effects of aircraft overflights within the AIA.

2.3 COLLABORATIVE PLANNING PROCESS

The proposed NASNI ALUCP was prepared through a collaborative planning process involving meetings with a Working Group and consultations with the affected local agencies. The Working Group met 12 times between March 2016 and August 2017. **Table 2-1** lists the entities represented on the Working Group.

TABLE 2-1 ENTITIES INVITED TO SERVE ON NASNI ALUCP WORKING GROUP

| ENTITIES INVITED TO SERVE ON WORKING GROUP | |
|---|---|
| Airport Authority Board Member | Coronado Real Estate Association |
| American Institute of Architects, San Diego | Coronado School District Board |
| City of Chula Vista | Coronado Tourism Improvement District (CTID) |
| City of Coronado | County of San Diego |
| City of Imperial Beach | Hotel del Coronado |
| City of National City | NASNI Community Plans and Liaison Officer |
| City of San Diego | Property Owners in Safety Zones |
| Coronado Chamber of Commerce | SANDAG Regional Military Working Group |
| Coronado Historical Association | San Diego Regional Chamber of Commerce, Military Affairs Advisory Council |
| Coronado Main Street | San Diego Unified Port District Staff |
| | San Diego Unified Port District, Coronado Port Commissioner |

SOURCE: San Diego County Regional Airport Authority, May 2019.

During the process, Working Group members reviewed preliminary draft documents, posed questions, made suggestions, and worked directly with the ALUC staff and technical consultants in developing the compatibility policies and standards. Members of the Working Group also attended public community meetings and ALUC Board meetings and provided comments.

The public was invited to review and comment on preliminary work products at 10 community meetings held from March 2016 to June 2017.

2.4 PROJECT LOCATION

NASNI is located southwest of the City of San Diego across the San Diego Bay and adjacent to the City of Coronado on the northern portion of Coronado Island in southwestern San Diego County.¹⁷ **Exhibit 2-1** depicts the location of NASNI in relation to western San Diego County.

As depicted on **Exhibit 2-2**, NASNI is bounded by San Diego Bay on the north and west, the Pacific Ocean on the south, and the City of Coronado on the east.

2.5 PROJECT CHARACTERISTICS

The proposed ALUCP would serve as the primary tool for the ALUC in reviewing proposed land developments in the NASNI environs for compatibility with NASNI aircraft operations. The ALUCP is also intended to assist local agencies (including the cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego, the San Diego Unified Port District, and the County of San Diego) in preparing or amending land use plans and regulations and in reviewing proposed land use projects within their jurisdictions.

Land use plans and regulations include any general plan, community plan, specific plan, master plan, precise plan, zoning ordinance, zoning map, or any amendments to any of these policy and regulatory documents. The term also applies to building regulations and amendments, other than the State Building Code, which would pertain to the land use policies and standards of the ALUCP. Land use plans and regulations also include any school district, community college district, or special district master plans or amendments to master plans.¹⁸

A land use project is a proposed development requiring a ministerial or discretionary permit or approval from a local agency, or a proposed development sponsored by a local agency, that involves any of the following:

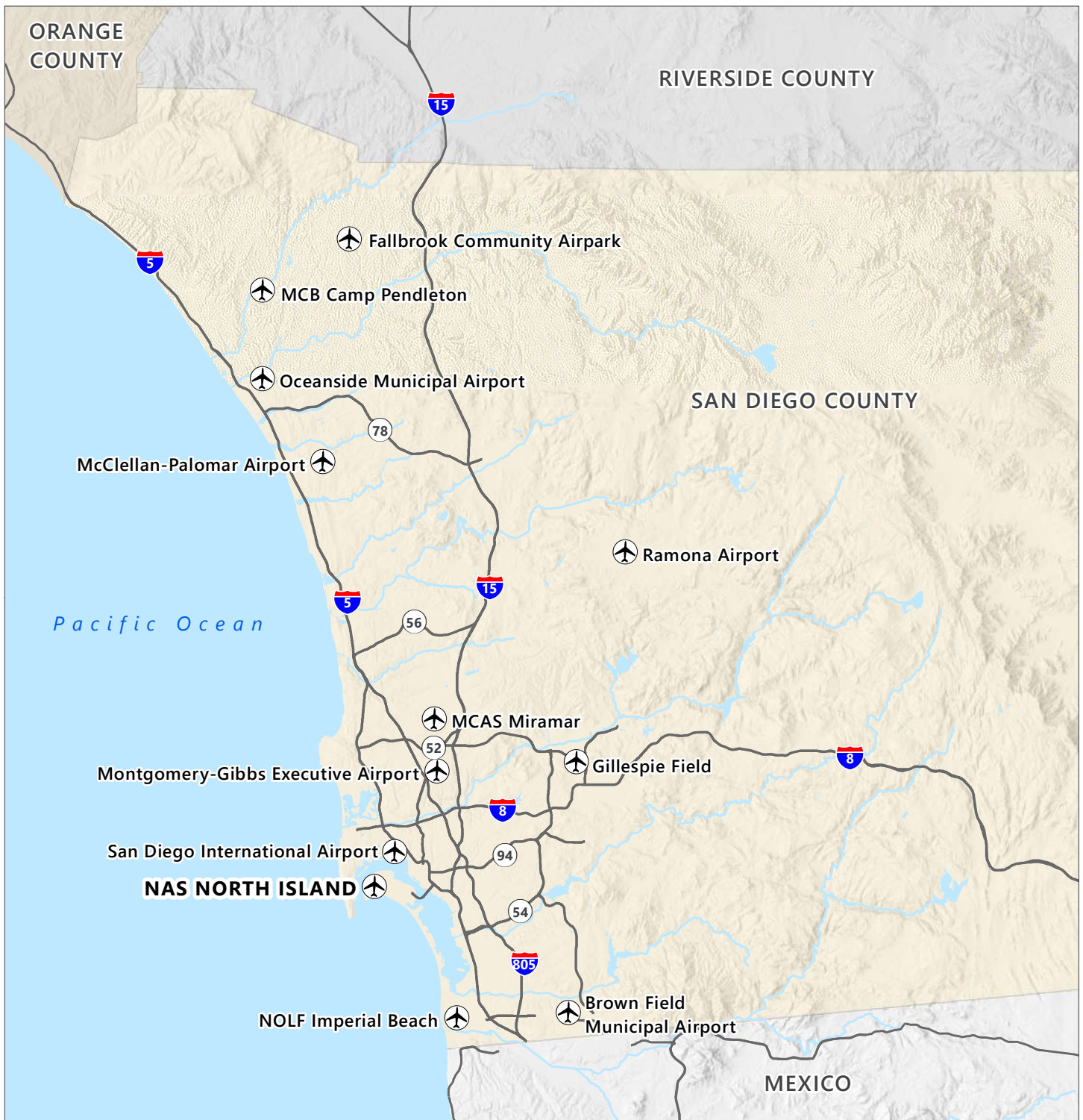
- Construction of a new building;
- Enlargement of an existing building's floor area;
- Subdivision of land;
- Change of use within an existing structure;
- Increase in height of an existing structure.

The ALUCP would be applicable to landowners – including local governments, school districts, special districts, and private parties.¹⁹

¹⁷ A description of NASNI is provided in Section 2 of the proposed ALUCP.

¹⁸ California Public Utilities Code § 21676.

¹⁹ California Public Utilities Code § 21670(f), § 21674.7(b), § 21675.



Sources: Airbus, USGS, NGA, NASA, CGIAR, NCEAS, NLS, OS, NMA, Geodatastyrelsen, GSA, GSI and the GIS User Community, August 2019 (terrain); US Census, Geography Division, TIGER/Line Shapefiles, 2018 (county); ESRI, 2010 (water, roads); Federal Aviation Administration, 2019 (airports).

Prepared by: Ricondo & Associates, Inc., October 2019.

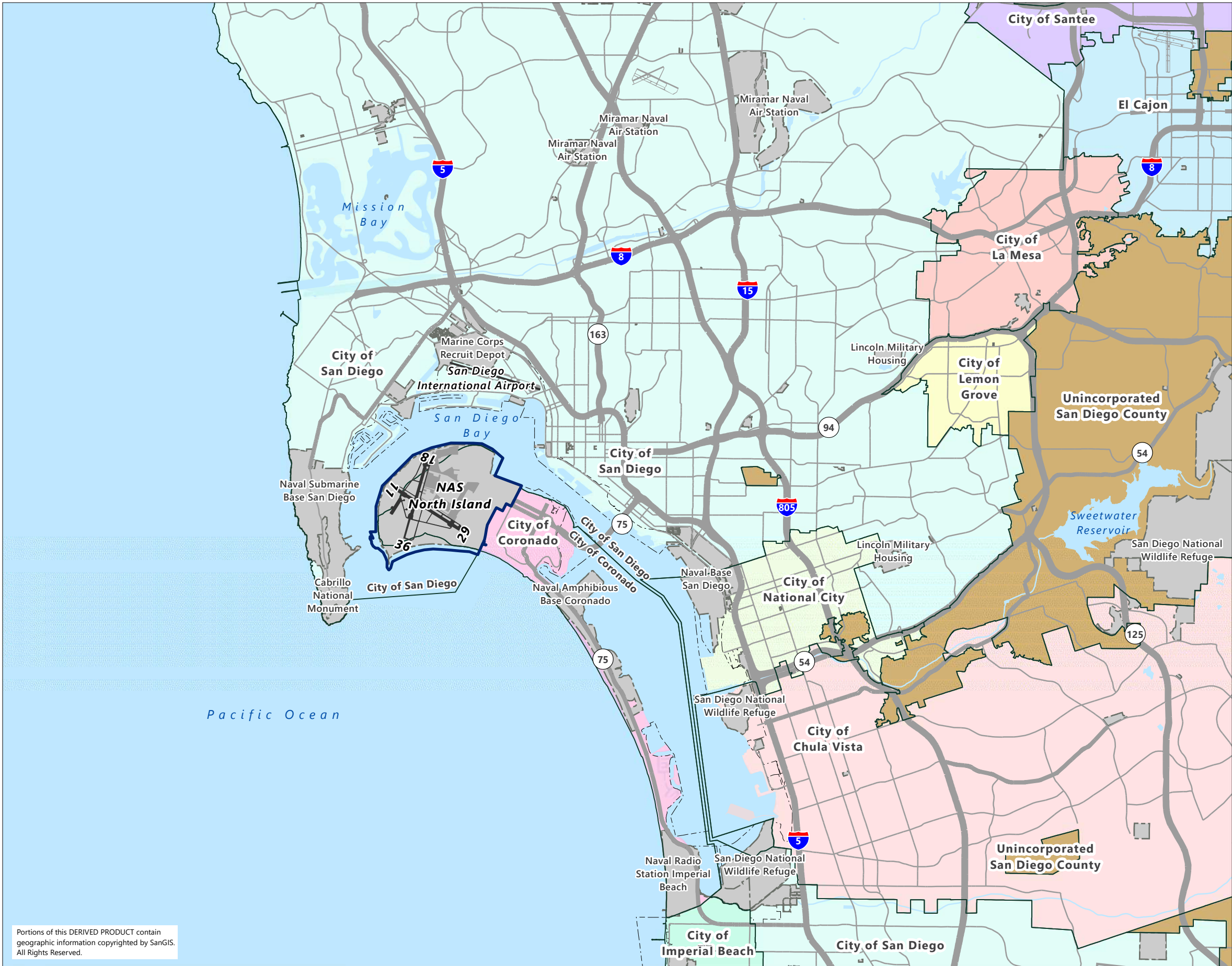
SAN DIEGO
COUNTY
REGIONAL
AIRPORT
AUTHORITY

AIRPORT
LAND USE
COMMISSION



Exhibit 2-1

NASNI Regional Location Map



- LEGEND**
- Major Roads
 - Highways
 - ▭ Naval Air Station Property Boundary
 - ▭ Federal Lands
 - ▭ San Diego Unified Port District
 - ▭ Municipal Boundaries
 - ▭ Water
 - ▭ Unincorporated San Diego County



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways).

Prepared By: Ricondo & Associates, Inc., August 2019.

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Exhibit 2-2
NASNI
Location Map

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The ALUCP comprises several components, summarized below:

- Purpose and Scope of the ALUCP. This component provides specific guidance on when the ALUCP may be amended, lists the goals of the ALUCP, discusses the geographic scope of the AIA, and discusses real estate disclosure as it relates to the AIA.
- Stakeholders Involved with this ALUCP. This component lists and describes the four groups of stakeholders who use or implement the ALUCP – the ALUC, local agencies, project sponsors, and the U.S. Navy.
- Limits of ALUC Authority. This component discusses the limitations on the ALUC’s authority. The properties to which the ALUCP policies would not apply are named, the facilities and operations at NASNI are specifically addressed as outside of the ALUC’s jurisdiction, and the various exemptions from ALUC review are listed and described.
- ALUC Review Process. This component describes the processes used by the ALUC to review land use plans and regulations as well as proposed land use projects. The discussion describes the consistency determination review process and types of land use changes requiring a consistency review.
- Airport Land Use Compatibility Policies. This component covers the airport land use compatibility policies. The proposed ALUCP provides land use policies and standards within the AIA to address each compatibility concern – noise, safety, airspace protection, and overflight notification. The proposed ALUCP also provides compatibility maps for noise and safety, airspace protection, and overflight as well as a map defining the AIA for NASNI.
- Implementation or Overrule of ALUCP. This component describes the process for consistency determinations after a local agency amends its land use plans and regulations to be consistent with the ALUCP or overrules all or part of the ALUCP.
- Technical Documentation and Supporting Information. Nine appendices include: (1) an explanation of the land use classifications used in the ALUCP; (2) an explanation of the implementation tools and documentation available; (3) a description of NASNI and the local environs; (4-7) technical analyses explaining the basis for the safety, noise, airspace protection, and overflight notification policies; (8) an explanation of the terms and acronyms used in the ALUCP; and (9) a list of documents referenced in the ALUCP.

2.5.1 PLANNING HORIZON

At military airports, state law requires that ALUCPs be based on the AICUZ study prepared for the airport and must be consistent with the safety and noise standards of the AICUZ study.²⁰ Accordingly, the NASNI ALUCP is based on the airport facilities, forecast noise exposure, and accident potential zones described in the 2011 AICUZ study.²¹

2.5.2 AIRPORT INFLUENCE AREA, PROJECT AREA, AND AREA OF POTENTIAL IMPACT

2.5.2.1 AIRPORT INFLUENCE AREA

The full geographic scope of the proposed ALUCP is the AIA, which defines the jurisdictional boundaries of the ALUC. The AIA is the area within which Airport-related effects necessitate restrictions or conditions on future

²⁰ California Public Utilities Code § 21675(b).

²¹ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011.

development to ensure airport compatibility with the Airport. The AIA is defined by the outer boundaries of the noise, safety, airspace protection, and overflight factor layers. The proposed NASNI AIA covers approximately 175 square miles of land in the cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego; unincorporated San Diego County; and the San Diego Unified Port District, as depicted on **Exhibit 2-3**. Approximately 50 square miles of the AIA involves U.S. government and tribal lands where the ALUC has no jurisdiction, effectively reducing the area in which the ALUCP is applicable to 125 square miles.

2.5.2.2 PROJECT AREA

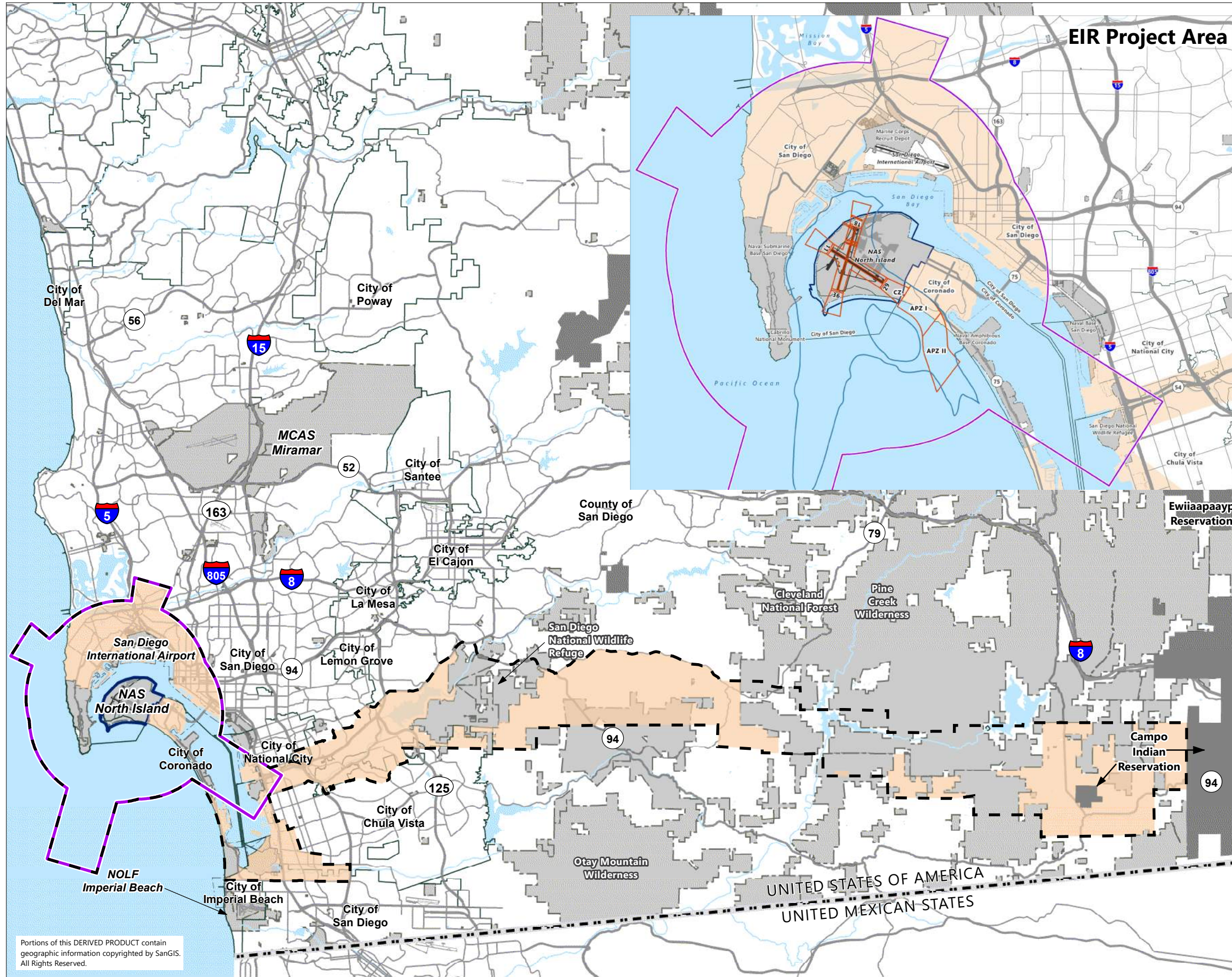
As indicated on Exhibit 2-3, a smaller area within the proposed AIA is defined by the airspace protection boundary where airspace protection and flight safety policies and standards apply.²² This area is referred to as the Project Area. The noise contours and safety zones, where noise and safety policies and standards apply, lie within the Project Area, as depicted on the inset map on Exhibit 2-3. In the portion of the AIA outside the Project Area, only the overflight policy applies. Because the overflight policy involves only a notice to prospective buyers of new dwellings and does not involve limits on land uses, residential density, or development intensity, it would have no environmental impact. Thus, this EIR is focused on the potential environmental impacts of the ALUCP within the Project Area.

Local agencies in the Project Area which may be subject to ALUCP policies and standards include:

- City of Chula Vista
- City of Coronado
- City of National City
- City of San Diego
- County of San Diego²³
- Metropolitan Water District
- South Bay Irrigation District
- San Diego Unified Port District
- Chula Vista Elementary School District
- Coronado Unified School District
- National School District
- San Diego Community College District
- San Diego Unified School District
- Southeastern Community College District
- Sweetwater Union High School District

²² The overflight policy, which applies throughout the AIA, would also apply within the Project Area, which is part of the AIA.

²³ Because no unincorporated area lies within the Project Area, San Diego County has no land use planning or regulatory authority in the Project Area. The County, however, could be subject to ALUCP policies and standards as the owner of various public facilities in the Project Area (for example, Waterfront Park).



LEGEND

- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Native American/Tribal Reservation
- ▭ Federal Lands
- ▭ San Diego Unified Port District
- ▭ Municipal Boundaries
- ▭ International Boundary
- Water
- ▭ Airport Influence Area: the AIA is the area within which real estate disclosure is required per State law*
- ▭ Portion of AIA where development could be subject to ALUCP policies
- ▭ Airspace Protection Boundary, EIR Project Area
- ▭ 65 dB CNEL Contour
- ▭ Safety Zone Boundaries

* California Business and Professions Code Section 11010(b)(13); California Civil Code, Sections 1103.4 and 1353 (a)(1).



Sources: SanGIS, County of San Diego, 2019 (roads); SanGIS, County of San Diego Assessor's Office, Mapping Division, 2019 (Native American lands); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); US Department of State, 2015 (international boundary); SanGIS, County of San Diego, 2015 (hydrology); San Diego County Regional Airport Authority, Airport Land Use Commission (AIA and airspace protection boundary); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 4-8 on page 4-1 (CNEL contours); Figure 5-3 on page 5-7 (safety zones).

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Exhibit 2-3
Airport Influence Area and EIR Project Area

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2.5.2.3 AREA OF POTENTIAL IMPACT

Based on the analysis in the Initial Study²⁴ and Section 4 of this EIR, the potential impacts of the proposed ALUCP are confined to the area within the safety zones and 65 dB CNEL contour. These areas are depicted on Exhibit 2-3 in the inset map. This area is referred to as the Area of Potential Impact in this EIR.

2.5.3 COMPATIBILITY POLICIES AND STANDARDS OF THE PROPOSED ALUCP

The proposed ALUCP has been prepared in recognition of the State legislature's purpose of "ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."²⁵ The ALUCP would establish policies and standards for four compatibility factors: noise, safety, airspace protection, and overflight.²⁶ The compatibility policies and standards of the proposed ALUCP are summarized in the remainder of this section.

2.5.3.1 NOISE AND SAFETY COMPATIBILITY

Aircraft noise is one of the most basic airport land use compatibility concerns. Noise-sensitive land uses described in the proposed ALUCP are based on guidance provided in Title 21, Subchapter 6, Section 5014 of the California Code of Regulations and the NASNI AICUZ Study. The Title 21 noise standards specifically name residences, public and private schools, hospitals and convalescent homes, and places of worship as incompatible within a noise impact boundary defined by the 65 dB CNEL contour unless the uses are sound-attenuated to an indoor noise level of 45 dB CNEL.²⁷ The AICUZ land use compatibility guidance considers residences and nursing homes, in addition to transient lodgings and outdoor music shells and amphitheaters, generally incompatible with noise above 65 dB CNEL.²⁸ In addition, the AICUZ guidance considers hospitals, schools, places of worship, and concert halls and auditoriums compatible with noise above 65 dB CNEL only if they are sound-attenuated to reduce noise from exterior sources by 25 dB CNEL (equivalent to an indoor level of 40 to 45 dB CNEL). The intent of the proposed ALUCP noise compatibility policies and standards is to minimize the development of new noise-sensitive land uses and to provide for sound attenuation in any expanded or reconstructed noise-sensitive land uses within the 65 dB CNEL and higher contours.

Airport safety compatibility relates to the protection of people on the ground and in the air from aircraft accidents. The safety compatibility policies and standards of the proposed ALUCP are designed to minimize the risks associated with off-airport aircraft accidents or emergency landings. The safety compatibility policies and standards are intended to avoid the establishment of new land uses serving vulnerable occupants (e.g., people with limited effective mobility such as seniors, hospital patients, children requiring supervision, the infirm, etc.) and land uses with large concentrations of people or hazardous materials. To minimize these risks, the safety compatibility standards declare certain new uses as incompatible within the safety zones and set limits on (1) the density of new

²⁴ The Initial Study is included in this EIR as Appendix A.

²⁵ California Public Utilities Code § 21670(a)(2). This requirement also applies to land around military airports (California Public Utilities Code § 21675(b)).

²⁶ These are the four compatibility factors identified in the Caltrans Handbook (pp. xi, 4-1 – 4-46). The law requires that ALUCs "shall be guided by information" contained in the Caltrans Handbook (California Public Utilities Code § 21674.7[a]).

²⁷ California Code of Regulations, Title 21, Subchapter 6, *Noise Standards*, Section 5014. Although the state noise standards do not apply to military airports, they are a useful benchmark to aid in setting noise compatibility policies and standards in the vicinity of military airports.

²⁸ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Table C-1.

residential development, which is measured in terms of dwelling units per acre, and (2) the intensity of new nonresidential development, which, for purposes of this ALUCP, is measured in terms of gross floor area.

The proposed noise and safety compatibility policies and standards of the ALUCP apply to four compatibility zones, depicted on **Exhibit 2-4**. Those include three safety zones defined in the 2011 AICUZ study – the Clear Zone (CZ) and Accident Potential Zones (APZ) I and II²⁹ – where both noise and safety compatibility standards apply. The fourth compatibility zone is the area outside the safety zones within the 65 dB CNEL contour where noise compatibility standards (but not safety standards) apply.³⁰

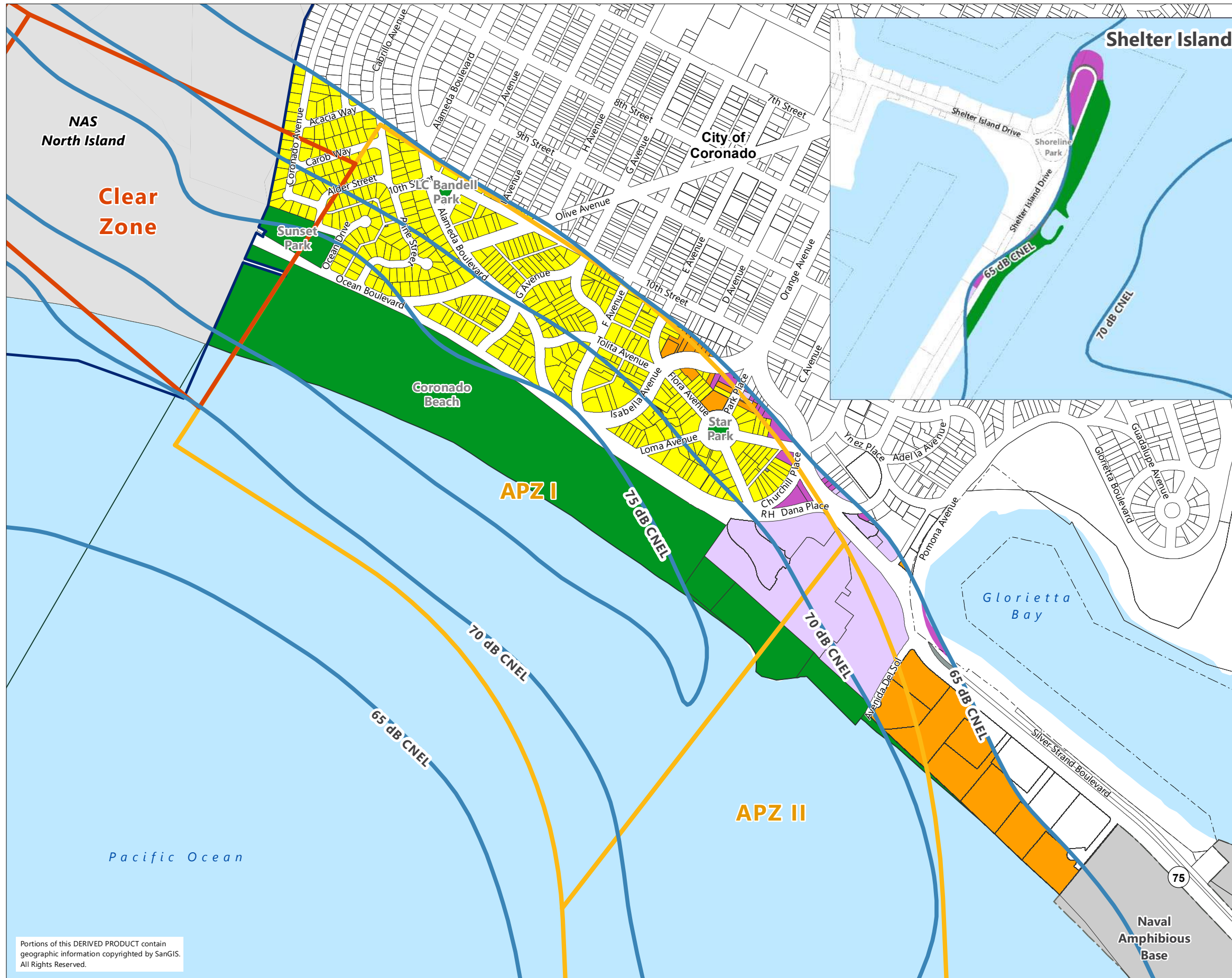
As depicted on Exhibit 2-4, the safety zone boundaries and the 65 dB CNEL contour are closely aligned. The 70 and 75 dB CNEL contours are entirely inside the safety zone boundaries and much of the area within the 65 dB CNEL contour is also within the safety zones. The exhibit also indicates that the land within the noise contours and safety zones is nearly fully developed. Both residential and nonresidential parts of the affected area are mature and stable, lacking any blight and undergoing little redevelopment pressure. Consequently, the proposed ALUCP noise and safety compatibility policies focus on measures appropriate to a community subject to periodic redevelopment and property improvement projects. The objective of the policies is to avoid making the existing land use incompatibility situation worse while also avoiding adverse impacts on existing land use. The noise and safety compatibility policies are also structured for ease of understanding and implementation. The following are key features of the policies:

- All existing land uses within the safety zones and the 65 dB CNEL contour are considered compatible with the proposed ALUCP;
- Existing noise-sensitive uses within the 65 dB CNEL and higher noise contours, which are all residential except for the Hotel del Coronado, are subject to interior noise level standards if they are expanded or reconstructed by 50 percent or more of the existing habitable area;
- The development of additional single-family and multiple-family dwellings within the safety zones, which would increase existing residential density, is incompatible to avoid increasing the level of land use existing incompatibility;³¹
- Expansion of the existing gross floor area of nonresidential uses within the safety zones is incompatible to avoid increasing the level of existing land use incompatibility;
- The development of new nonresidential risk-sensitive land uses within the safety zones is incompatible to avoid increasing the level of existing land use incompatibility;

²⁹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Figure 5-3, p. 5-7.

³⁰ The noise contours used in the proposed ALUCP are taken from the prospective noise exposure scenario presented in the AICUZ study. The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Figure 4-8, p. 4-12.

³¹ This limitation does not apply to accessory dwelling units as defined by state law.



**AIRPORT
LAND USE
COMMISSION**

LEGEND

- Naval Air Station Property Boundary
- Federal Lands
- San Diego Unified Port District
- Municipal Boundaries
- Clear Zone Boundary
- Accident Potential Zone (APZ) I & II Boundaries
- CNEL Noise Contours
- Existing Development**
- Commercial/Retail/Office
- Hotel-Motel
- Open Space
- Residential - Multifamily
- Residential - Single Family
- Transportation/Parking/Utility
- Water



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours), Figure 5-3 on page 5-7 (safety zones); SanGIS, SANDAG Technical Services, 2017 (existing development);
Prepared By: Ricondo & Associates, Inc., August 2019.

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**Exhibit 2-4
ALUCP Safety Zones
and Noise Contours**

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- Within the three safety zones (CZ, APZ I, and APZ II), noise and safety policies and standards are combined for ease of understanding and implementation. The risk-sensitive land uses that are incompatible in the safety zones also happen to be noise-sensitive uses that should be avoided in those areas, as all parts of the safety zones are exposed to noise ranging from 65 dB to over 75 dB CNEL. In this sense, the safety compatibility policies also fulfill noise compatibility objectives. The only independent noise standards applying in the safety zones relate to the need for the reduction of noise from exterior sources to a maximum interior level of 45 dB CNEL (for residences and other specific noise-sensitive land uses) or 50 dB CNEL with windows and doors closed (for sensitive nonresidential land uses).

The noise and safety standards proposed for each of the four compatibility zones are presented in **Table 2-2** and summarized in the following sections.

Clear Zone

Within the CZ, all new structures are considered incompatible. Twenty-eight single-family homes, however, are currently located within the CZ. As existing land uses, the ALUCP policies and standards would impose no limits on the maintenance, remodeling,³² expansion, or reconstruction³³ of these homes, as long as any expanded habitable area or reconstructed home is less than 50 percent of the original habitable area. The expansion of homes by 50 percent or more of the original habitable area would be compatible if the new habitable space is treated to achieve a 45 dB CNEL interior sound level with windows and doors closed. The same interior sound level standard applies to homes that are totally reconstructed or partially reconstructed, if the partial reconstruction involves 50 percent or more of the original habitable area.

Existing residential areas in the CZ are subject to noise levels of 65 dB CNEL to over 70 dB CNEL. The nature of the noise attenuation treatment required to achieve the 45 dB CNEL interior sound level likely will vary depending on the noise level to which the home is exposed. Homes within the 70-75 dB CNEL contour range will require measures to attenuate outdoor noise by 25 to 30 dB to achieve the 45 dB CNEL interior noise target; homes within the 65-70 dB CNEL contour range will require measures to attenuate noise by 20 to 25 dB to achieve 45 dB CNEL interior noise level.³⁴

Accident Potential Zone I

Within APZ I, a variety of land uses involving concentrations of people and potentially hazardous materials are considered incompatible, as indicated in Table 2-2. Examples include hotels, manufacturing and storage of hazardous materials, hospitals, nursing homes, schools, and places of public assembly. Numerous other land uses are considered compatible in APZ I if new construction is treated to achieve interior sound levels of 45 or 50 dB CNEL. The 45 dB CNEL standard applies to residential uses, libraries, museums, galleries, and sleeping areas in hotels and resorts. The 50 dB CNEL standard applies to office and public reception areas in various nonresidential land uses.

³² Remodeling includes the reconfiguration of space within building without increasing the habitable floor area (for a residence) or gross floor area (for a nonresidential building).

³³ Reconstruction means the rebuilding of all or a portion of an existing residential or nonresidential building.

³⁴ The interior noise level standard is based on all windows and doors being closed. Standard construction is presumed to achieve an outdoor-to-indoor noise level reduction of 20 dB [The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Table C-1, note 1(c)].

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TABLE 2-2 (1 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 dB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|----------------------------------|--|----|-------|--------|--|---|
| 10 Residences and Lodging | | | | | | |
| 111 | Single-Family including accessory dwelling units; Supportive housing; Transitional housing | 45 | 45 | 45 | 45 | CZ, APZ I/II: One dwelling unit per legal lot of record at the time of ALUCP adoption, in addition to an accessory dwelling unit All Zones: For new or reconstructed or expanded portions of buildings, interior noise must perform to sound level indicated. |
| 112, 113, 12 | Multi-Family; Group quarters; Bed and breakfast inn | | 45 | 45 | 45 | APZ I/II: Residential density limited to the density existing at time of ALUCP adoption; for new or reconstructed or expanded portions of buildings, interior noise must perform to sound level indicated. Inside 65 dB CNEL: For new or reconstructed or expanded portions of buildings, interior noise must perform to 45 dB CNEL. |
| 13, 14, 15, 19 | Residential Hotel; Mobile home park; Hotel/motel | | | | 45 | Inside 65 dB CNEL: For new or reconstructed or expanded portions of buildings, interior noise must perform to 45 dB CNEL in sleeping areas. |
| 20-30 Manufacturing | | | | | | |
| 23, 28, 29, 31, 35, 3999 | Manufacturing: Apparel; Chemicals; Hazardous materials; Petroleum; Rubber; Plastic; Precision instruments | | | | | |
| 21, 22, 32-34 | Manufacturing: Food; Metals; Stone, clay, and glass; Textiles | | | 50 | | APZ II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 24-27, 39 | Manufacturing: Furniture and fixtures; Lumber and wood products; Paper; Printing and publishing; Miscellaneous manufacturing | | 50 | 50 | | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |

TABLE 2-2 (2 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|--|---|----|-------|--------|---|---|
| 40 Transportation, Communication, and Utilities | | | | | | |
| 41-46, 49 | Auto parking; Boat launch ramp; Vehicle, freight, equipment storage | | | | | APZ I/II: No passenger facilities |
| 47, 48 | Communication: Telephone, radio, television; Utilities: Electrical, including wind and solar farms; Gas; Water; Wastewater | | | | | |
| 485 | Refuse Disposal: Sanitary landfill, solid waste/recycling center ⁵ | | | | | |
| 50 Trade | | | | | | |
| 51-59 | Wholesale/Retail Trade, including eating/drinking establishment | | 50 | 50 | | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 60 Services | | | | | | |
| 61, 62, 63, 65, 67, 69 | Office: Finance, insurance, real estate, medical/dental; Services: Personal/professional/government; Research & Development | | 50 | 50 | | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 6242, 637, 64, 66 | Cemetery; Warehousing/storage (not including hazardous materials); Repair, including auto, electronics, furniture; Contract construction services | | 50 | 50 | | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 6379 | Warehousing/storage of hazardous materials | | | | | |
| 6513, 6516 | Hospital; Congregate care/nursing/convallescent facility; Large residential care facility | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 68 | Day care; Nursery school; Elementary, middle/junior high, and high school; College/university | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 6911, 6994 | Indoor Public Assembly: Religious, fraternal | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |

TABLE 2-2 (3 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|----------------------------|---|----|-------|--------|--|---|
| 70 | Culture, Entertainment, and Recreation | | | | | |
| 71 | Library; Museum; Art gallery; Planetarium; Aquarium | | 45 | 45 | 45 | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; new or reconstructed portions of buildings, interior noise must perform to sound level indicated. Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 723 | Indoor Entertainment Assembly: Auditorium, concert hall, theater | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 721, 722 | Outdoor Assembly: Amphitheater, music shell; Spectator sports arena, stadium | | | | | |
| 7123, 7124, 741, 743, 744, | Outdoor Participant Sports: Golf course, tennis court, riding stable, water recreation; Botanical garden; Zoo | | | | | APZ I/II: No clubhouse, indoor meeting place, or auditorium. |
| 73 | Amusement park; Golf driving range; Go-cart track; Miniature golf course | | | | | |
| 742, 7414, 7415, 7417, 79 | Athletic club; Gym; Fitness facility; Bowling alley; Recreation center; Skating rink | | 50 | 50 | | APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; in new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 76 | Park | | | | | CZ: No above-ground structures APZ I/II: No clubhouse, indoor meeting place, or auditorium. |
| 749, 752 | Campground | | | | 45 | Inside 65 dB CNEL: In new or reconstructed portions of buildings, interior noise must perform to 45 dB CNEL in sleeping areas. |

TABLE 2-2 (4 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|-------------------------|---|----|-------|--------|---|--|
| 751 | Resort | | 45/50 | 45/50 | 45 | <p>APZ I/II: No increase in gross floor area of existing uses; reconstructed building(s) limited to gross floor area at time ALUCP adoption; interior noise in new or reconstructed portion of building must perform to 45 dB CNEL in sleeping areas and 50 dB CNEL in all other areas; no new uses that are classified as incompatible in this table.</p> <p>Inside 65 dB CNEL: In new or reconstructed portions of buildings, interior noise must perform to 45 dB CNEL in sleeping areas.</p> |
| 80 | Resource Production and Extraction | | | | | |
| 81-85, 89 | Agriculture, aquaculture, mining | | | | | |

KEY TO TABLE 2-2:

- Compatible land use. Not subject to any noise or safety standards
- Compatible land use if the indicated standards are met
- Incompatible land use
- 45, 50 Maximum interior sound level (in dB CNEL) from exterior noise sources with windows and doors closed. Interior sound level in new, reconstructed, or expanded portion of building, or in certain parts of building as described in the Standards columns, must perform to the level indicated. It is the responsibility of the project sponsor to demonstrate that the building, as designed, can achieve the interior sound level. This may be accomplished by the certification of an appropriately licensed design professional (engineer, architect, or acoustician with building design experience). The degree of acoustical treatment that is required will vary based on building design and the noise exposure level to which the building is exposed.

NOTES TO TABLE 2-2:

- 1 The reuse of any land use for an incompatible use per this table is inconsistent with this ALUCP.
- 2 *Standard Land Use Coding Manual*, U.S. Department of Commerce, Urban Renewal Administration and Bureau of Public Roads, 1965. The SLUCM is a comprehensive land use classification system defined with a hierarchical set of codes. The most detailed level of classification uses 4 digits (say, 6911 for "churches, synagogues, and temples"), the next most detailed level uses three digits (691 for "religious activities"), a more generalized level uses two digits (69 for "miscellaneous services"), and the most generalized level uses one digit (6 for "services"). In this land use compatibility table, the generalized two-digit SLUCM codes have been used where possible. The standards applicable to each two-digit level of land uses apply to all of the more detailed land uses (using three-digit and four-digit codes) within the two-digit category, unless a more detailed SLUCM Code is used elsewhere in the table. For example, in the second row of the "Transportation, Communication and Utilities" category, SLUCM Codes 47 and 48 include communications and utilities land uses. In the third row, however, SLUCM Code 485, refuse disposal, is called out as a distinct land use for purposes of land use compatibility. Thus, SLUCM Code 48, in the second row, should be interpreted as including all uses described in the SLUCM under the "48 code," except for Code 485.
- 3 Community Noise Equivalent Level
- 4 Per Section 5.1.6 of the proposed ALUCP, Reconstruction of Existing Nonresidential Uses, gross floor area includes vested development.
- 5 While refuse disposal and related uses are not noise-sensitive, they are considered incompatible within the 65 dB CNEL contour because of their tendency to attract birds, a potential hazard to flight. These uses are considered incompatible throughout the Airspace Protection Area, which includes all areas within the 65 dB CNEL contour. See Section 5.2.5.6 Wildlife Attractants of the proposed ALUCP.

SOURCES: San Diego County Airport Land Use Commission, proposed NASNI ALUCP policies and standards. Adapted from Tables C-1 and C-2 in the 2011 AICUZ (The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, pages C-1 - C-10.)

Because APZ I includes areas exposed to noise from 65 to over 75 dB CNEL, as depicted on Exhibit 2-4, noise attenuation measures to achieve the target interior level of 45 dB CNEL will vary throughout APZ I. For example, residential uses within the 75-80 dB CNEL contour will require measures to attenuate outdoor noise by 30 to 35 dB to achieve the 45 dB CNEL level (with windows and doors closed); those within the 70-75 dB CNEL contour will require measures to attenuate noise by 25 to 30 dB; and those within the 65-70 dB CNEL contour will require measures to attenuate noise by 20 to 25 dB.

Accident Potential Zone II

Within APZ II, which applies to only a small area in Coronado between Silver Strand Boulevard and the ocean, similar standards apply. The only differences are that certain manufacturing uses (food, metals, stone, clay, glass, and textiles) and certain amusement places and facilities (amusement parks, golf driving ranges, go-cart tracks, and miniature golf courses), which are incompatible in APZ I, are considered compatible in APZ II.

The interior sound level standards applying in APZ I apply in APZ II. As depicted on Exhibit 2-4, noise levels in APZ II range from 65 dB CNEL to over 70 dB CNEL.

Areas Inside 65 dB CNEL and Outside Safety Zones

According to the standards described in Table 2-2, places of outdoor assembly, such as amphitheaters and music shells, are incompatible within this zone.³⁵ Other noise-sensitive uses, such as housing, hospitals, schools, and places of public assembly, are considered compatible within the 65 dB CNEL contour and outside the safety zones if the new uses are treated to achieve indoor sound levels of no higher than 45 dB CNEL with windows and doors closed. The noise level reduction standards also apply to the remodeling and reconstruction of any of these existing uses and to the reconstruction of existing housing.

2.5.3.2 AIRSPACE PROTECTION

The proposed ALUCP airspace protection and flight safety standards apply within the airspace protection boundary, depicted on **Exhibit 2-5**. (The airspace protection boundary also defines the EIR Project Area, as discussed in Section 2.5.2.) The boundary is defined by a combination of the Part 77, Subpart B, airport vicinity notification surfaces and the inner Part 77, Subpart C, airport obstruction surfaces.³⁶ The airspace protection policies establish the means for requiring compliance with Federal Aviation Administration (FAA) airspace determinations, which are undertaken in compliance with 14 CFR Part 77, and to acknowledge state law, which stipulates that no object determined by the FAA to be a hazard to air navigation can be erected without a permit from Caltrans.³⁷

³⁵ These uses are also considered incompatible in the CZ and APZ I and APZ II. One other land use, which is not noise-sensitive – refuse disposal – also is considered incompatible in all compatibility zones, including the area within the 65 dB CNEL contour and outside the safety zones. This is because of the potential for refuse disposal facilities to attract birds, a potential hazard to the safety of flight this close to NASNI.

³⁶ Refer to the AICUZ study for more information about airspace surfaces. The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Section 5.1.

³⁷ California Public Utilities Code § 21657, § 21659(b).

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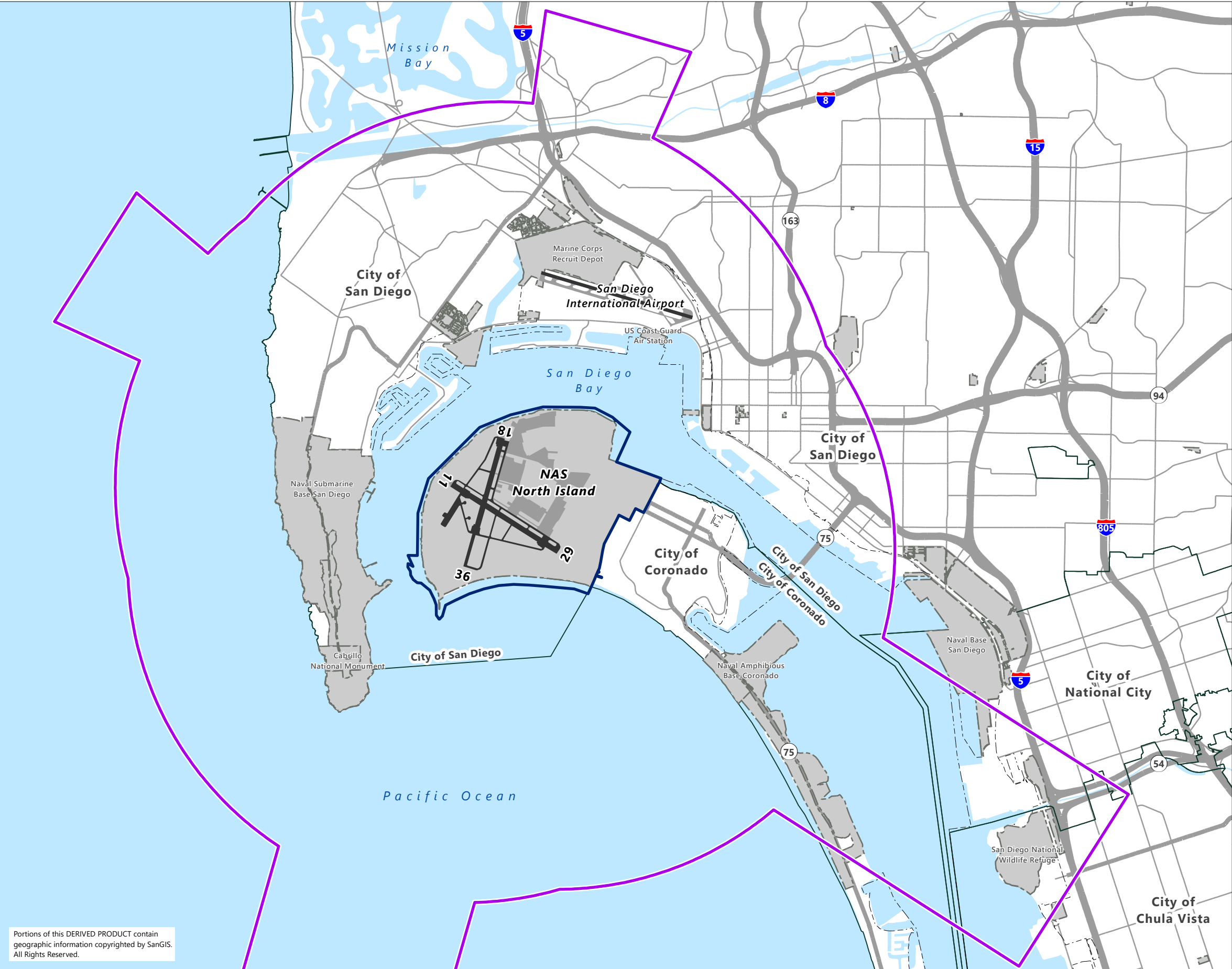
- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- - - San Diego Unified Port District
- ▭ Municipal Boundaries
- ▭ Water
- Airspace Protection Boundary, EIR Project Area



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); San Diego County Regional Airport Authority, Airport Land Use Commission (airspace protection boundary); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways).

Prepared By: Ricondo & Associates, Inc., August 2019.

Exhibit 2-5
ALUCP
Airspace Protection Boundary



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The proposed ALUCP airspace policies support existing federal and state law and regulations that ensure that hazards to air navigation are not built and that obstructions to air navigation are properly marked and lighted. While the ALUCP airspace policies are intended to ensure that local agencies comply with the FAA's regulations, the airspace policies would not establish new limitations on the heights of new structures and objects, nor would they impose any changes on heights of existing structures and objects. Those height limitations already exist through the combination of FAA's airspace protection regulations and state law. The FAA's airspace protection regulations and the applicable state law have been in effect for many years and are independent of the ALUCP. While changes in proposed structure heights may result from findings of the FAA's Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process, that process has been in place for many years and is not altered by the ALUCP. Compliance with the proposed ALUCP airspace protection policies would essentially add a layer to the existing FAA regulatory process by requiring local agencies to incorporate the 14 CFR Part 77 policies into their land use planning and regulatory documents.

The proposed ALUCP flight safety standards are intended to ensure that proposed land use projects would avoid features that could compromise flight safety within the airspace protection boundary. Particularly problematic features include glare/glint that could interfere with pilot and air traffic controller vision; thermal plumes that could interfere with the safe control of aircraft; dust, smoke, and vapor that could obscure pilot and controller vision; electromagnetic interference with communications, radar, and electronic navigational aids; outdoor lighting which may be confused with airfield lighting systems; and wildlife attractants that could jeopardize the safe control of aircraft.

2.5.3.3 OVERFLIGHT

The overflight notification policy accounts for the fact that many people are sensitive to the frequent presence of aircraft over their homes and may experience annoyance, whether the noise levels are high or low. The proposed ALUCP overflight notification policy provides that for any land use project involving a new or completely reconstructed dwelling unit, the local agency with permitting authority should provide a means for the owner of the property to be informed of the potential effects of aircraft overflight. Potential methods to implement this policy include the following:

- Adopt an ordinance requiring a recorded overflight agreement;
- Provide notice upon issuance of building permits; or
- Adopt an overlay zone containing notice.

Compliance with the State real estate disclosure law, which requires any person who offers residential property for sale or lease within an airport influence area to disclose the proximity of the property to the airport, is adequate to fulfill the overflight notification policy of the proposed ALUCP.³⁸

The overflight notification policy would not impose any limits on land uses, residential density, or development intensity.

³⁸ California Business and Professions Code § 11010(a) and (b)(13); California Civil Code §§ 1102.6, 1103.4 and 1353; California Code of Civil Procedure § 731a.

2.6 INTENDED USES OF THE EIR

The EIR will be used by SDCRAA, in its role as the ALUC for San Diego County, to inform its deliberations leading to the adoption of the proposed ALUCP for NASNI. The ALUC is required to review and certify the EIR prior to making a decision to approve the proposed ALUCP. Other potential uses of this EIR are discussed in the following sections.

2.6.1 PERMITS AND APPROVALS TO IMPLEMENT PROPOSED PROJECT

Implementation of the ALUCP will begin with the ALUC's adoption by resolution of the proposed ALUCP. After ALUC adoption, local agencies are required to submit all proposed land use projects, land use plans, zoning ordinances or amendments, and other land use regulations to the ALUC for a determination of consistency with the proposed ALUCP.³⁹

Local agencies also play an important role in implementing the ALUCP. Under state law, local agencies are required to amend their general plans, specific plans, and zoning ordinances to achieve consistency with the ALUCP, which is determined by a resolution of the ALUC.⁴⁰ Alternatively, the governing body may overrule the ALUCP, or any part of the ALUCP, with a two-thirds vote, after making specific findings that the local agency's current land use plans and regulations fulfill the purposes of the ALUC statute.⁴¹

After amending their plans and regulations or overruling the ALUCP, local agencies assume the responsibility for the review of all proposed land use projects for consistency with their plans and regulations. Any proposed land use plans and regulations, including amendments to those plans and regulations, must continue to be reviewed by the ALUC for consistency with the ALUCP. Until the local agencies amend their land use plans and zoning ordinances or overrule the ALUCP, the ALUC also will continue to review all proposed land use projects prior to issuance of applicable permits or approvals by the affected local agencies.

2.6.2 AGENCIES EXPECTED TO USE THE EIR IN DECISION MAKING

In addition to the ALUC, the cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego and the County of San Diego are expected to refer to this EIR as they prepare and consider any amendments to their general plans, applicable community plans and specific plans, and zoning ordinances needed to achieve consistency with the ALUCP. In addition, the San Diego Unified Port District must review its land use plans for consistency with the ALUCP and consider the need for amendments to its land use plans. School districts, community college districts, and other special districts are also subject to the requirements of the ALUC statute and will need to review their facility master plans and development plans for consistency with the ALUCP.⁴² Determinations of consistency must ultimately be rendered by the ALUC after the local agency has applied for such a consistency determination.

All local agencies must comply with the requirements of CEQA before they amend their land use plans and regulations. This EIR may be a helpful reference as they prepare their own environmental compliance documentation.

³⁹ The proposed ALUCP defines land use projects as "proposed development requiring a ministerial or discretionary permit or approval from a local agency, or a proposed development sponsored by a local agency, that involves any of the following: Construction of a new building; Enlargement of an existing building's floor area; Subdivision of land; Change of use within an existing structure; Increase in height of an existing structure." See Section 2.2 of the proposed ALUCP Initial Study (Appendix A of this EIR).

⁴⁰ California Public Utilities Code § 21675.1(d); California Government Code § 65302.3.

⁴¹ California Public Utilities Code § 21676, § 21676.5.

⁴² California Public Utilities Code § 21675.1(f).

Any local agencies with jurisdiction in the Coastal Zone must submit proposed amendments to land use plans and regulations affecting their certified local coastal programs to the California Coastal Commission (Coastal Commission) for a certification of compliance with state law.⁴³ The Coastal Commission may refer to this EIR in its consideration of any amendments to community plans, specific plans, precise plans, or land use regulations that are proposed by local agencies to achieve consistency with the proposed ALUCP.

The State of California Department of Transportation, Division of Aeronautics, is responsible for reviewing the proposed ALUCP and determining whether the plan meets the requirements of state law.⁴⁴ The staff of the Division of Aeronautics may refer to this EIR as they formulate their determination about compliance of the proposed ALUCP with state law.

2.6.3 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS

As explained in the preceding section, local agencies that choose to implement the ALUCP, rather than overrule it, must amend any affected general plans and zoning ordinances to ensure consistency with the proposed ALUCP.⁴⁵ Amendments of those plans and regulations are subject to the environmental review requirements of CEQA. If those amendments affect the local coastal programs of the agencies, then the agencies must submit the proposed amendments to the Coastal Commission for certification of compliance with the California Coastal Act.⁴⁶

⁴³ California Public Resources Code § 30514.

⁴⁴ California Public Utilities Code § 21675(d), § 21675(e).

⁴⁵ According to law, local agencies must amend their plans and ordinances to be consistent with the ALUCP within 180 days after adoption of the ALUCP. See California Government Code § 65302.3.

⁴⁶ California Public Resources Code §§ 30000 et seq.

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3. ENVIRONMENTAL SETTING

3.1 INTRODUCTION

Pursuant to California Environmental Quality Act (CEQA) Guidelines, “an EIR must include a description of the physical environmental conditions in the vicinity of the project... Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published ... from both a local and regional perspective.”¹ The Notice of Preparation (NOP) for the Naval Air Station North Island (NASNI or the Airport) Airport Land Use Compatibility Plan (ALUCP) was published on April 22, 2019.

The existing physical conditions in the Project Area would not be directly affected by the proposed project. The proposed project is a land use plan, and therefore, does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Rather, the ALUCP includes policies and standards limiting the future development of new noise- or risk-sensitive land uses, limiting the density of residential development, and limiting the intensity of nonresidential development within the Project Area. In addition, on-airport property is not subject to the ALUCP standards and policies.

The EIR Project Area is the portion of the proposed NASNI Airport Influence Area (AIA) within the airspace protection boundary, which includes the 65 decibel (dB) Community Noise Equivalent Level (CNEL) noise contours and the safety zones. (See Exhibit 2-3 in Section 2.) The Initial Study determined that the proposed ALUCP has the potential to cause significant impacts to one environmental resource category: Land Use and Planning.

This section reviews existing conditions at NASNI, natural features and terrain in the Project Area, existing residential and nonresidential land uses, the Navy’s Air Installations Compatible Use Zones (AICUZ) study, and existing land use plans and policies of local agencies in the Project Area.

3.2 EXISTING PHYSICAL CONDITIONS

This section reviews the physical characteristics and components of NASNI, including aircraft operations, flight routes, and aircraft types using the facility; natural features of the areas surrounding the Airport; and existing land uses of the Airport environs.

3.2.1 NAVAL AIR STATION NORTH ISLAND

As a federal facility, NASNI is not subject to the ALUCP standards and policies. According to state law, however, the ALUCP must be based on the airport operator’s development plans and, at military airports, the applicable AICUZ study.² Thus, it is informative to briefly discuss the existing physical conditions of the Airport and its environs.

NASNI comprises 2,803 acres (of which 282 acres are tideland) in southwestern San Diego County.³ The Airport is located on the northern portion of Coronado Island adjacent to the city of Coronado and approximately two miles southwest of downtown San Diego across San Diego Bay. NASNI is bounded by San Diego Bay on the north and

¹ Association of Environmental Professionals, *2019 California Environmental Quality Act (CEQA) Statute and Guidelines*, Chapter 3: Guidelines for Implementation of The California Environmental Quality Act, Section 15125(a).

² California Public Utilities Code, §§ 21675(a), (b).

³ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach*, California, Naval Facilities Engineering Command Southwest, 2011, p. 2-13.

west, the Pacific Ocean on the south, and the city of Coronado on the east. Ground access to NASNI is facilitated in two ways: (1) by crossing the San Diego-Coronado Bridge (State Route 75) from the city of San Diego and passing through the city of Coronado or (2) by entering from the south end of San Diego Bay through the city of Imperial Beach and proceeding north along the Silver Strand on State Route 75 through the city of Coronado. Exhibit 2-1 in Section 2 depicts the location of NASNI in relation to western San Diego County.

NASNI is at an elevation of 26 feet above mean sea level (MSL) and has two intersecting runways and 13 helicopter pads, as illustrated on **Exhibit 3-1**. Runway 11-29 is 7,501 feet in length and 200 feet in width. Runway 18-36 is 8,001 feet in length and 200 feet in width.⁴ Airport support facilities are located primarily in the eastern and northeastern portion of the airfield and include maintenance, fuel and equipment supply and storage, the control tower, and hangars. The airport traffic control tower is open for flight operations from 6:30 a.m. to 10:00 p.m. Monday through Friday and 8:00 a.m. to 10:00 p.m. Saturday and Sunday.⁵

OPERATIONS

NASNI is the anchor base of Naval Base Coronado⁶ with the majority of the facilities dedicated to air operations. NASNI supports naval aviation training, logistics, maintenance, and repair activities. Numerous aircraft are assigned to NASNI, and it is the home port for two nuclear-powered aircraft carriers. A diverse set of missions and operations are flown by stationed and transient aircraft including deployment to and from ships, Naval Aviation Depot (NADEP) maintenance check flights, fleet replacement training, operational support flights, transient operations, and pilot currency.⁷ NASNI also hosts detachments for training at the off-shore Southern California (SOCAL) Range Complex.⁸ The aircraft flight operations of NASNI are described in Section 3.3 of the AICUZ study.⁹

NASNI operations include intensive helicopter training, occurring at sea and in the mountainous inland regions of San Diego County,¹⁰ and interfacility traffic between NASNI and Naval Outlying Landing Field Imperial Beach (NOLF IB).¹¹ Helicopters were responsible for 66 percent of the flight operations (takeoffs and landings) at NASNI during the baseline period (2003-2009) considered in the AICUZ study. This is projected to increase to 80 percent by 2020.¹²

⁴ AirNav.com. Airfield information for North Island Naval Air Station (Halsey Field) San Diego, California, USA, <http://www.airnav.com/airport/KNZY> (accessed December 13, 2016).

⁵ Federal Aviation Administration, *Airport/Facility Directory, Southwest U.S.*, effective date: 0901Z Jun 20 - 0901Z Aug 15, 2019, p. 174.

⁶ The Naval Base Coronado installation includes seven military facilities in the San Diego County area – Naval Amphibious Base Coronado, Silver Strand Training Complex, Mountain Warfare Training Facility Camp Michael Monsoor, Remote Training Site Warner Springs, Naval Auxiliary Landing Field San Clemente Island, Camp Moreno, and Naval Outlying Land Field Imperial Beach.

⁷ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 3-4.

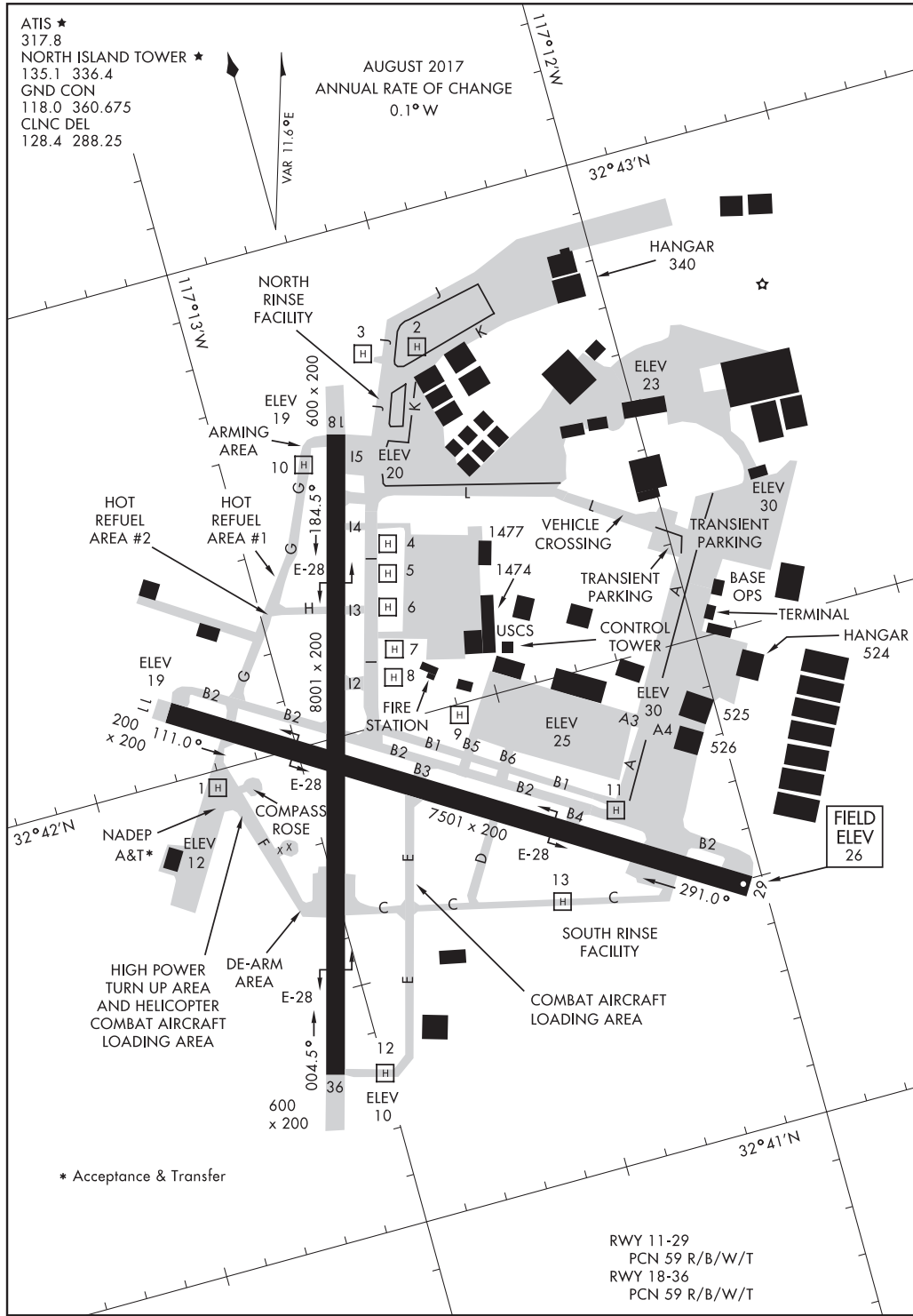
⁸ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 2-6.

⁹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 3-4.

¹⁰ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 3-4.

¹¹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 3-11, p. 3-15.

¹² The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Tables A-1 and A-3, pp. A-1 – A-7.



Source: FAA, U.S. Terminal Procedures Publication, Southwest (SW) Vol 3 of 4, effective 20 June 2019.
Prepared by: Ricondo & Associates, Inc., July 2019.

Exhibit 3-1

NASNI Airport Diagram

SAN DIEGO
COUNTY
REGIONAL
AIRPORT
AUTHORITY

AIRPORT
LAND USE
COMMISSION



Approximately 95 percent of all operations at NASNI are by aircraft based at the facility, while only five percent of operations are by transient aircraft. This proportion is projected to remain relatively constant through the future period considered in the AICUZ study.¹³

Flight Routes

Routes in and out of NASNI are designed to (1) separate NASNI traffic from San Diego International Airport (SDIA) air traffic and (2) keep arrival, departure, closed pattern, and interfacility air traffic between NASNI and NOLF IB over San Diego Bay and the Pacific Ocean to the maximum extent possible while avoiding low overflights of urban areas.¹⁴ AICUZ Section 3.3.1 and AICUZ Figures 3-5, 3-7, 3-9, and 3-11 provide more information about flight routes in and out of NASNI.¹⁵

At NASNI, precision approach radar (PAR) approaches are available to Runways 29 and 36.¹⁶ Various nonprecision approaches are available to Runways 29, 18, and 36.¹⁷ The Hotel Visual Approach is also published for arrivals to Runway 29.¹⁸ This procedure directs aircraft to approach NASNI from the south over the ocean, avoiding overflights of Coronado, until turning left for a short straight-in final approach to land.¹⁹

One instrument departure procedure is published for NASNI. It applies to departures from Runways 11, 29, and 18. It requires departures from Runways 11 and 29 to turn south immediately after takeoff to avoid overflights of Point Loma and Coronado. Takeoffs from Runway 18 are directed to climb over the ocean.²⁰

Aircraft at NASNI

The following list outlines the aircraft projected to be assigned to NASNI as of 2020 as described in the AICUZ study.²¹

- H-60 Seahawk/Nighthawk – helicopter produced in several variants that serve in various combat and search and rescue roles
- C-2A Greyhound – fixed-wing carrier-based transport capable of carrying high-priority cargo and passengers for Carrier On-Board Delivery

¹³ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Table 2-2, p. 2-8

¹⁴ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach*, Naval Facilities Engineering Command Southwest, 2011, pp. 3-9, 3-11, 3-13, 3-15.

¹⁵ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, pp. 3-8, 3-9, 3-11, 3-13, 3-15.

¹⁶ Precision approaches provide both lateral and vertical guidance to the runway through electronic and visual navigational aids.

¹⁷ Nonprecision instrument approaches provide lateral guidance to the runway, but do not provide instrument guidance for the descent.

¹⁸ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 5-11.

¹⁹ Federal Aviation Administration, *Aeronautical Information Services, U.S. Terminal Procedures Publication, Southwest (SW), Vol 3 of 4*, 25 Apr 2019.

²⁰ Federal Aviation Administration, *Aeronautical Information Services, U.S. Terminal Procedures Publication, Southwest (SW), Vol 3 of 4*, 25 Apr 2019.

²¹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 2-7.

- CMV-22B Osprey – tilt-rotor aircraft scheduled to replace the C-2A at NASNI in the future²²
- C-12 Huron – fixed-wing twin turboprop passenger and cargo aircraft
- C-40A Clipper – military/naval cargo version of the Boeing 737, which can be configured for carrying passengers
- EA-6B Prowler – land- and carrier-based electronic warfare jet aircraft
- EA-18G Growler – electronic warfare jet aircraft scheduled to replace the EA-6B
- F/A-18C/D Hornet – jet aircraft designed for conventional air-to-air and air-to-ground combat
- F/A-18E/F Super Hornet – upgrade of the F/A-18C/D

Transient aircraft that operate in and out of NASNI include various fighter, submarine warfare, and cargo aircraft.²³

3.2.2 NATURAL FEATURES

Terrain and natural features constrain NASNI, both physically and in terms of airport operations. As indicated in Exhibit 2-1 in Section 2, NASNI is surrounded to the north and west by San Diego Bay and to the south by the Pacific Ocean. The city of Coronado is directly east and south of the Airport. The city of San Diego lies across the Bay to the west, north, and east, and the cities of National City and Chula Vista are to the southeast.

Title 14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (Part 77), establishes standards for defining obstruction surfaces around airports and establishes procedures for FAA review of proposed construction or alteration of objects near airports that could affect navigable airspace. As depicted in Exhibit 5-1 of the AICUZ study,²⁴ hilly terrain is present to the west of NASNI in Point Loma, Sunset Cliffs, and adjacent neighborhoods. In this area, the terrain penetrates the Part 77 Approach-Departure Clearance Surface. As shown in the NASNI flight track exhibits,²⁵ aircraft avoid this terrain and instead fly over the San Diego Bay to arrive at and depart from NASNI.

The climate in San Diego presents few problems for airport operations. The latitude and tempering effect of the Pacific Ocean result in few temperature extremes or gale winds. Prevailing west-northwesterly winds are very consistent. A few annual instances of easterly winds are typical in the autumn. Fog does occur frequently along the coast, at times reducing visibility at NASNI.²⁶

²² Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018; Department of Defense, Department of the Navy, *Finding of No Significant Impact for the Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers – Naval Air Station North Island, California, and Naval Station Norfolk, Virginia*, November 15, 2018.

²³ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach*, California, Naval Facilities Engineering Command Southwest, 2011, p. 2-8.

²⁴ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach*, California, Naval Facilities Engineering Command Southwest, 2011, p. 5-3.

²⁵ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach*, California, Naval Facilities Engineering Command Southwest, 2011, pp. 3-9, 3-11, 3-13, 3-15.

²⁶ San Diego County Regional Airport Authority, Airport Land Use Commission, *Final Environmental Impact Report, Airport Land Use Compatibility Plan, San Diego International Airport*, January 2014, p. 3-4.

3.2.3 EXISTING LAND USE

As depicted on **Exhibit 3-2**, the NASNI vicinity is fully developed with urban land uses. The Project Area comprises parts of the cities of Chula Vista, Coronado, National City, and San Diego; the San Diego Unified Port District; SDIA; and military facilities including Naval Submarine Base San Diego, the Fleet Antisubmarine Warfare facility, Naval Amphibious Base, the Marine Corps Recruit Depot, and the U.S. Coast Guard Station.

As depicted on Exhibit 3-2, existing land uses in the NASNI vicinity are diverse, comprising a combination of dense urban residential and nonresidential development. Existing nonresidential development is found throughout the Project Area and is comprised of a multitude of land uses classified among the following categories:

- Commercial/Retail/Office
- Hotel/Motel
- Institutional
- Industrial
- Mixed-Use
- Park and Open Space
- Transportation/Utility

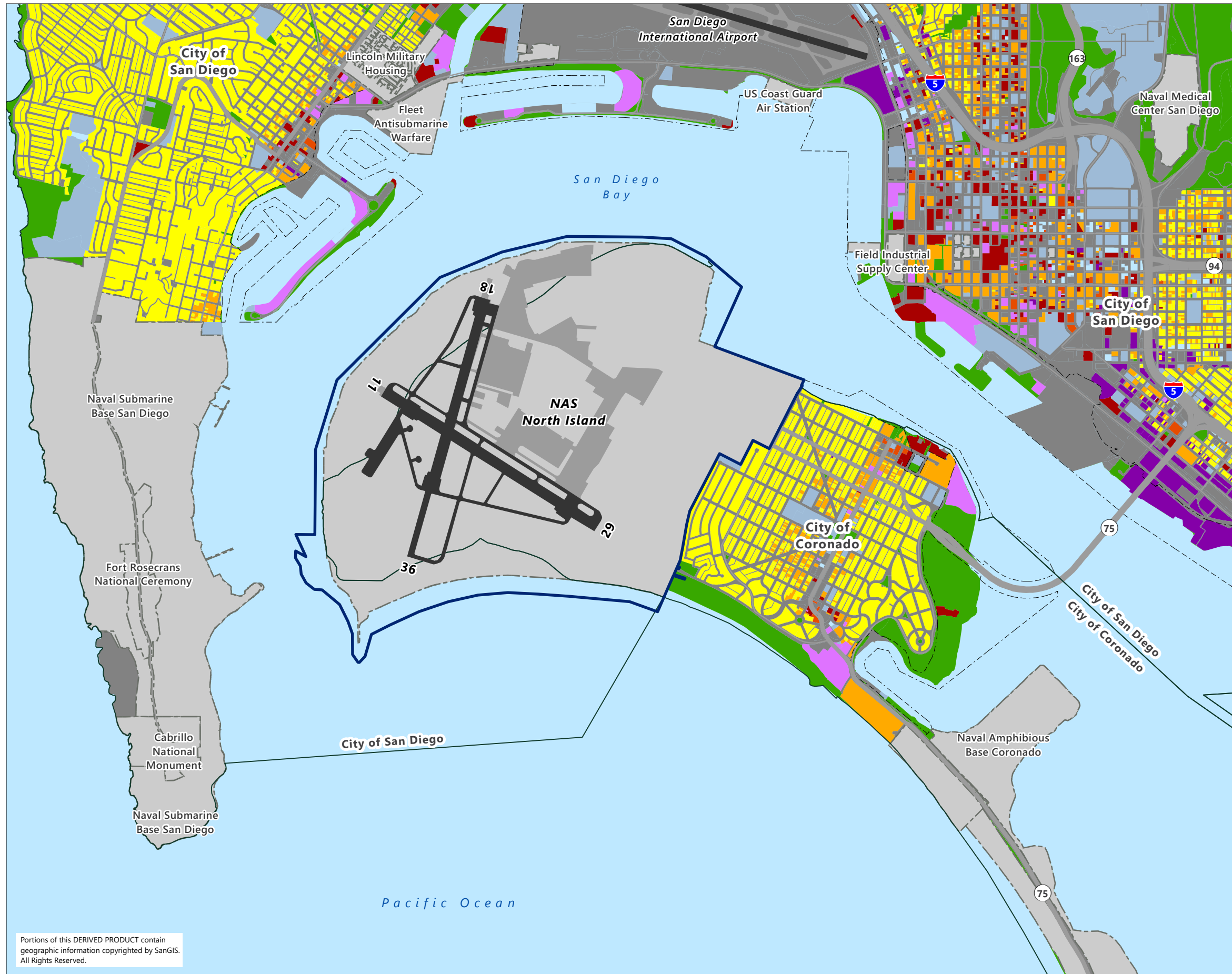
The city of Coronado is almost fully built-out, with single-family residential being the dominant type of land use. Substantial public open spaces are located on the south and east sides of the city along the waterfront. The city's Orange Avenue commercial core is approximately one mile east of the airfield. Multi-family housing areas are near the commercial areas. To the east of the Airport and across the Bay from Coronado, Downtown San Diego is characterized by dense urban land uses including multiple-family residential, mixed-use, and commercial/retail/office. Along San Diego Bay, land use is largely dedicated to transportation/utility and industrial purposes with some park and open space. To the west of the Airport, the San Diego neighborhoods north of Naval Base Point Loma, including La Playa and Sunset Cliffs, are characterized predominantly by single-family residential land use.

3.3 LOCAL AGENCIES

Local agencies subject to the proposed ALUCP include municipalities, San Diego County, and special districts²⁷ with jurisdiction in the AIA. This section briefly describes the local agencies with jurisdiction within the Project Area, the area within which implementation of the ALUCP would result in limits on land use and the density and intensity of new development.²⁸

²⁷ Public Utilities Code, Section 21670(f).

²⁸ See Section 2.4.2, Airport Influence Area and Project Area, of this EIR.



LEGEND

- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- ▭ San Diego Unified Port District
- ▭ Municipal Boundaries
- Existing Development**
- ▭ Agriculture
- ▭ Commercial/Retail/Office
- ▭ Hotel/Motel
- ▭ Industrial
- ▭ Institutional
- ▭ Mixed Use
- ▭ Open Space
- ▭ Single Family
- ▭ Multifamily
- ▭ Transportation/Utility
- ▭ Water



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, SANDAG Technical Services, 2017 (existing development); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways).

Prepared By: Ricondo & Associates, Inc., August 2019.

**Exhibit 3-2
Generalized Existing
Development**

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3.3.1 MUNICIPAL GOVERNMENTS

Municipal and county governments are responsible for land use planning and regulation, in addition to many other government and service functions. **Exhibit 3-3** depicts the city corporate limits within the Project Area, which is located entirely in San Diego County. Parts of the following municipalities are in the Project Area:

- City of Chula Vista
- City of Coronado
- City of National City
- City of San Diego

3.3.2 COMMUNITY COLLEGE AND SCHOOL DISTRICTS

Portions of two community college districts, the San Diego Community College and Southwestern Community College Districts, depicted on **Exhibit 3-4**, are within the Project Area and the 65 dB CNEL contour. The Southwestern Community College District is also partially within the safety compatibility zones. These districts would be subject to proposed ALUCP noise, safety, and airspace protection policies and standards if their facility master plans include plans for any new facilities in the Project Area.

Five school districts have territory within the Project Area, as depicted on **Exhibit 3-5**.²⁹

- Chula Vista Elementary School District
- Coronado Unified School District
- National School District
- San Diego Unified School District
- Sweetwater Union High School District (which overlays the Chula Vista and National elementary districts)

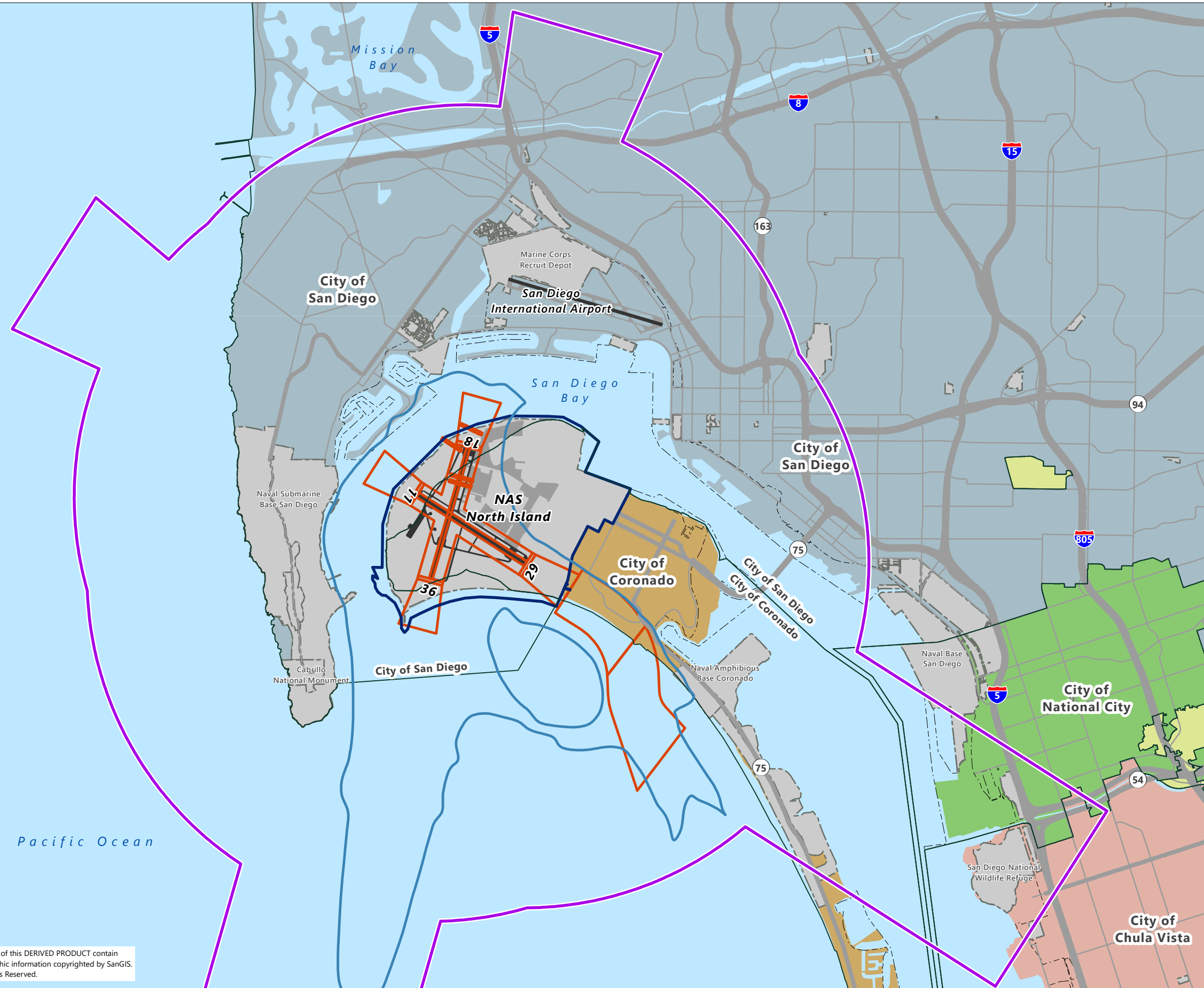
3.3.3 UTILITIES AND PORT DISTRICTS

Exhibit 3-6 depicts the boundaries of utility and service districts with specialized land development authority within the Project Area, including the following:

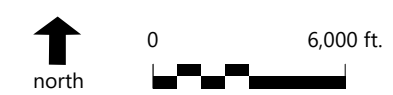
- The Metropolitan Water District of Southern California
- South Bay Irrigation District
- The San Diego Unified Port District (Port District)

²⁹ San Diego Geographic Information Source, <http://www.sangis.org/> (accessed July 18, 2017).

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- LEGEND**
- Major Roads
 - Highways
 - ▭ Naval Air Station Property Boundary
 - ▭ Federal Lands
 - - - San Diego Unified Port District
 - Airspace Protection Boundary, EIR Project Area
 - Safety Zone Boundaries
 - 65 dB CNEL Contour
 - Water
 - City of Chula Vista
 - City of Coronado
 - City of National City
 - City of San Diego
 - Unincorporated San Diego County



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 4-8 on page 4-12 (CNEL contours); Figure 5-3 on page 5-7 (safety zones).













Prepared By: Ricondo & Associates, Inc., August 2019.

Exhibit 3-3
Municipalities within the EIR Project Area

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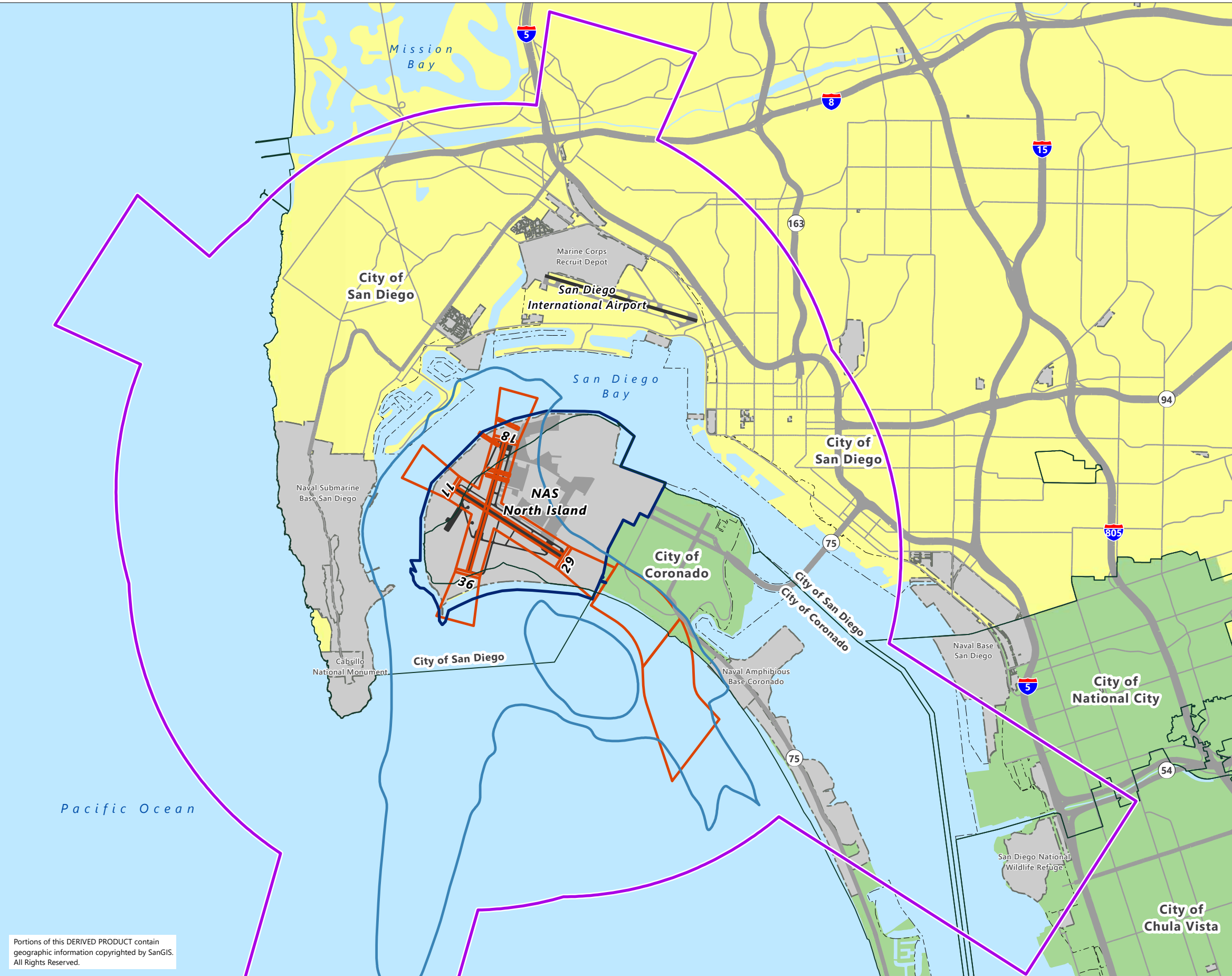
-  Major Roads
-  Highways
-  Naval Air Station Property Boundary
-  Federal Lands
-  San Diego Unified Port District
-  Municipal Boundaries
-  Airspace Protection Boundary, EIR Project Area
-  65 dB CNEL Contour
-  Safety Zone Boundaries
-  Water
-  San Diego Community College District
-  Southwestern Community College District



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries, college districts); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 4-8 on page 4-12 (CNEL contours); Figure 5-3 on page 5-7 (safety zones).
 Prepared By: Ricondo & Associates, Inc., August 2019.

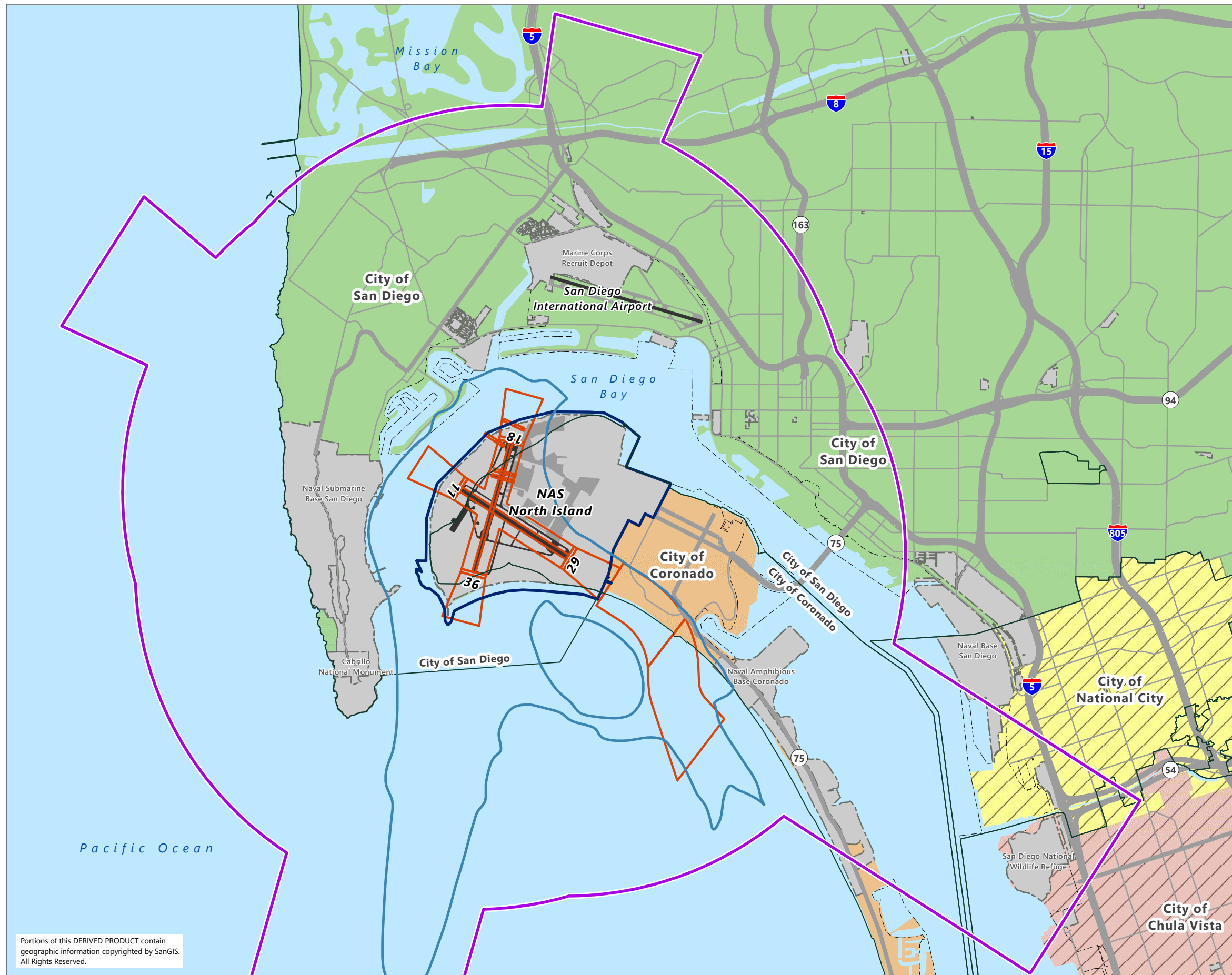
Exhibit 3-4

Community College Districts within the EIR Project Area



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LEGEND

- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- - - San Diego Unified Port District
- ▭ Municipal Boundaries
- Airspace Protection Boundary, EIR Project Area
- 65 dB CNEL Contour
- Safety Zone Boundaries
- Water
- Coronado Unified School District
- San Diego Unified School District
- Sweetwater Union High School District
- Chula Vista Elementary School District
- National School District



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries, elementary, highschool and college districts); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways).
 Prepared By: Ricondo & Associates, Inc., August 2019.

Exhibit 3-5
School Districts
within the EIR Project Area

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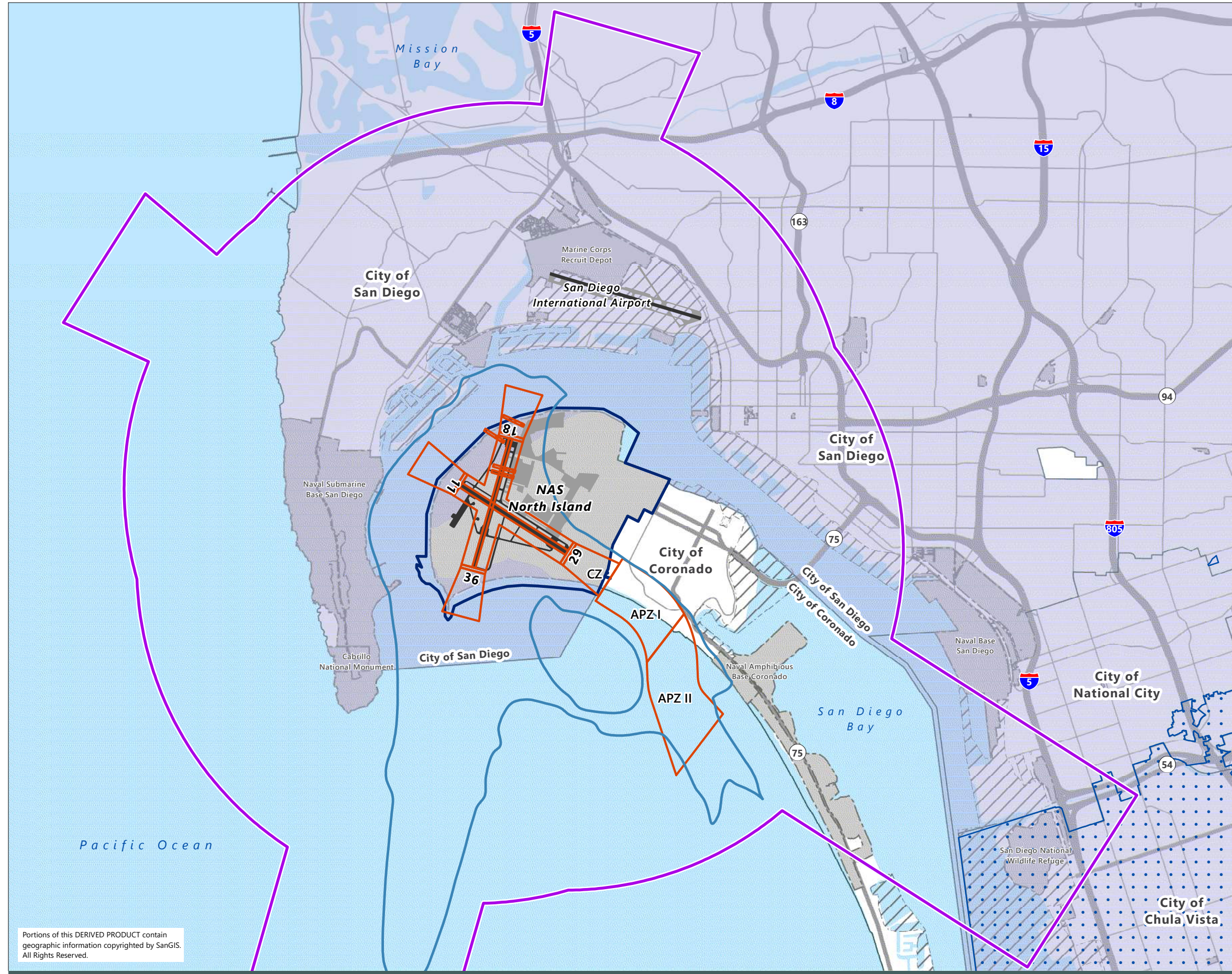
- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- ▭ San Diego Unified Port District
- ▭ Municipal Boundaries
- Airspace Protection Boundary, EIR Project Area
- 65 dB CNEL Noise Contours
- Safety Zone Boundaries
- ▭ Metropolitan Water District of Southern California
- ▭ South Bay Irrigation District
- ▭ Water



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries, water districts); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways).

Prepared By: Ricondo & Associates, Inc., October 2019.

Exhibit 3-6
Utility and Service Districts with Development Authority within EIR Project Area



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The Metropolitan Water District of Southern California imports water from the Colorado River and Northern California to cities and water agencies in six counties, including the San Diego County Water Authority (SDCWA). SDCWA serves most of the communities in western San Diego County and is charged with providing a reliable supply of water to the San Diego region. The SDCWA delivers wholesale water supply to 24 retail water agencies in the San Diego area, including the South Bay Irrigation District.³⁰

The Port District oversees maritime operations, recreation, tourism and public safety in the tidelands of San Diego Bay and the surrounding waterfront. The Port District also has land development authority within its jurisdiction.³¹

3.3.4 OTHER SPECIAL DISTRICTS

Other special districts within the Project Area, including business improvement districts (BIDs), maintenance assessment districts (MADs), community parking districts, a geological hazard abatement district,³² and a community facilities district³³ are not affected by the policies and standards of the proposed ALUCP. They have limited responsibilities that involve the financing of previously built public improvements or the provision of services that would not be subject to ALUCP policies and standards.

3.4 EXISTING LAND USE PLANS AND POLICIES

The existing plans and documents relevant to the proposed ALUCP include the Department of Defense AICUZ study prepared for NASNI; general plans, community plans, specific plans and zoning ordinances of the surrounding communities; the San Diego Unified Port District Port Master Plan and related precise plans; the ALUCPs for other airports with AIAs intersecting the AIA of NASNI; and the Hotel del Coronado Amended Master Plan.

3.4.1 AIR INSTALLATION COMPATIBLE USE ZONES UPDATE

The AICUZ update for NASNI and NOLF IB was published in 2011 by the Naval Facilities Command Southwest (NAVFAC SW). The goal of the AICUZ program is to protect the health, safety, and welfare of populations living on or near military airfields while concurrently preserving the operational viability of the airfield by providing land use compatibility planning guidance to local agencies in the airport environs.³⁴ The AICUZ defines noise and safety zones with corresponding compatibility guidelines. According to state law, the ALUCP must be consistent with the noise and safety standards of the AICUZ.³⁵

The AICUZ noise zones are based on modeled CNEL contours. Two sets of CNEL contours were modeled. A baseline scenario was developed from a seven-year average (2003-2009) of total annual aircraft operations at NASNI. A prospective future scenario (2020) was also developed to reflect anticipated operational levels at NASNI, as

³⁰ San Diego County Water Authority, <https://www.sdcwa.org/frequently-asked-questions-and-key-facts> (Accessed July 19, 2017).

³¹ Unified Port of San Diego, <https://www.portofsandiego.org/about-us.html> (Accessed July 19, 2017).

³² The Casa de la Playa Geological Hazard Abatement District was formed in 1997 to protect a cliff-top condominium building in the Ocean Beach neighborhood of San Diego. In 2012, the district received approval to construct a bluff retaining wall, a seawall, and a public access path and stairway to the beach.

³³ Community Facilities District Number 3 – Liberty Station was formed to finance public improvements required in connection with the mixed-use redevelopment of the property within the former Naval Training Center west of San Diego International Airport. The District is administered by the City of San Diego.

³⁴ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, p. ES-1.

³⁵ California Public Utilities Code § 21675(b).

presented in **Exhibit 3-7**. The prospective future contours were the basis for the AICUZ noise zones where the noise compatibility guidelines apply.³⁶

The AICUZ safety guidelines are applicable in clear zones and accident potential zones which were developed for each runway end and helicopter landing pad at NASNI.³⁷ Each runway and helicopter landing pad has a Clear Zone (CZ). Runway 29 has two accident potential zones (APZ I and APZ II) extending beyond the CZ. Only the CZ and APZs off the approach end of Runway 29 extend off NASNI property and onto land within the jurisdiction of the City of Coronado. All other Clear Zones are confined to NASNI property, San Diego Bay, or the Pacific Ocean. (See **Exhibit 3-8**.)

The U.S. Navy is planning a conversion from C-2A Greyhound fixed-wing aircraft to CMV-22B Osprey tilt-rotor aircraft starting in 2020 and finishing by 2028. The Environmental Assessment (EA)³⁸ for the proposed project evaluated two action alternatives. Alternative 1 would increase the aircraft based at NASNI from 10 C-2As to 23 CMV-22Bs. Alternative 2 would increase the number of based CMV-22Bs to 18 aircraft.³⁹ The EA concluded that no significant environmental impacts would occur with either of the two alternatives.⁴⁰ No changes to the AICUZ study, prepared in 2011, would be required.⁴¹

3.4.2 GENERAL PLANS

In California, municipal and county governments are required to prepare and adopt general plans to guide the long-term physical growth of the city, county or any other lands outside of the jurisdictional boundaries that may be relevant to the development and planning of the entity.⁴² Each general plan must include seven elements addressing different aspects of human settlement.⁴³

- **Land Use Element.** The land use element designates the location and distribution of land uses throughout the jurisdiction. The land use element also provides recommended dwelling unit densities and development intensities for various land use districts. The land use element is specifically required to consider the impact of new development on military operations and readiness at any nearby military facilities.⁴⁴

³⁶ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Table C-1, pp. C-1 – C-5.

³⁷ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Table C2, pp. C-6 – C-10.

³⁸ Department of Defense, Department of the Navy, *Finding of No Significant Impact for the Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers – Naval Air Station North Island, California, and Naval Station Norfolk, Virginia*, November 15, 2018.

³⁹ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-1.

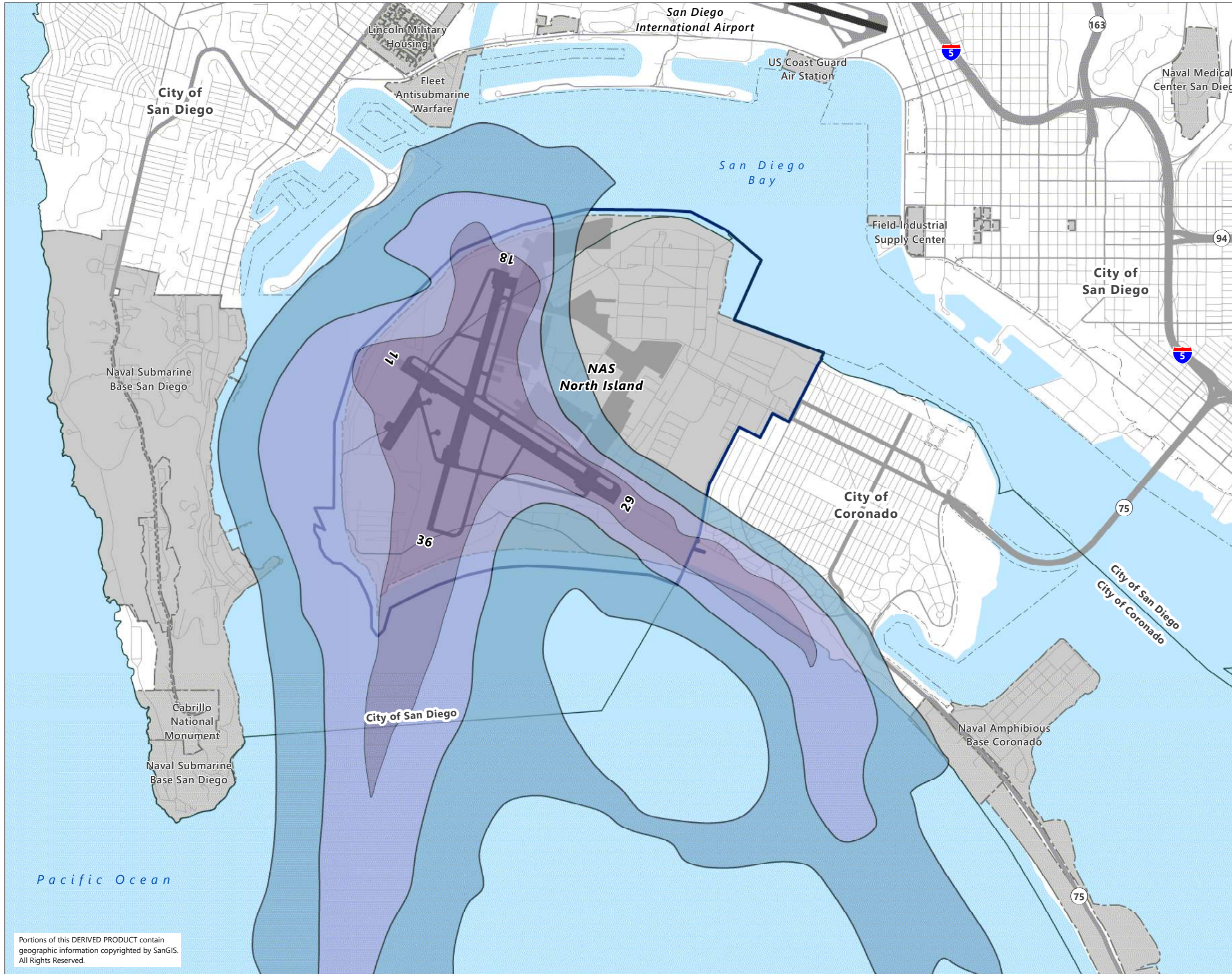
⁴⁰ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, pp. ES-5 – ES-13.

⁴¹ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-6.

⁴² California Government Code § 65300.

⁴³ California Government Code § 65302.

⁴⁴ California Government Code § 65302(a)(2).



**AIRPORT
LAND USE
COMMISSION**

LEGEND

- Major Roads
- Highways
- Naval Air Station Property Boundary
- Federal Lands
- San Diego Unified Port District
- Municipal Boundaries
- Water
- Noise Contour Ranges**
- 65-70 dB CNEL
- 70-75 dB CNEL
- 75+ dB CNEL



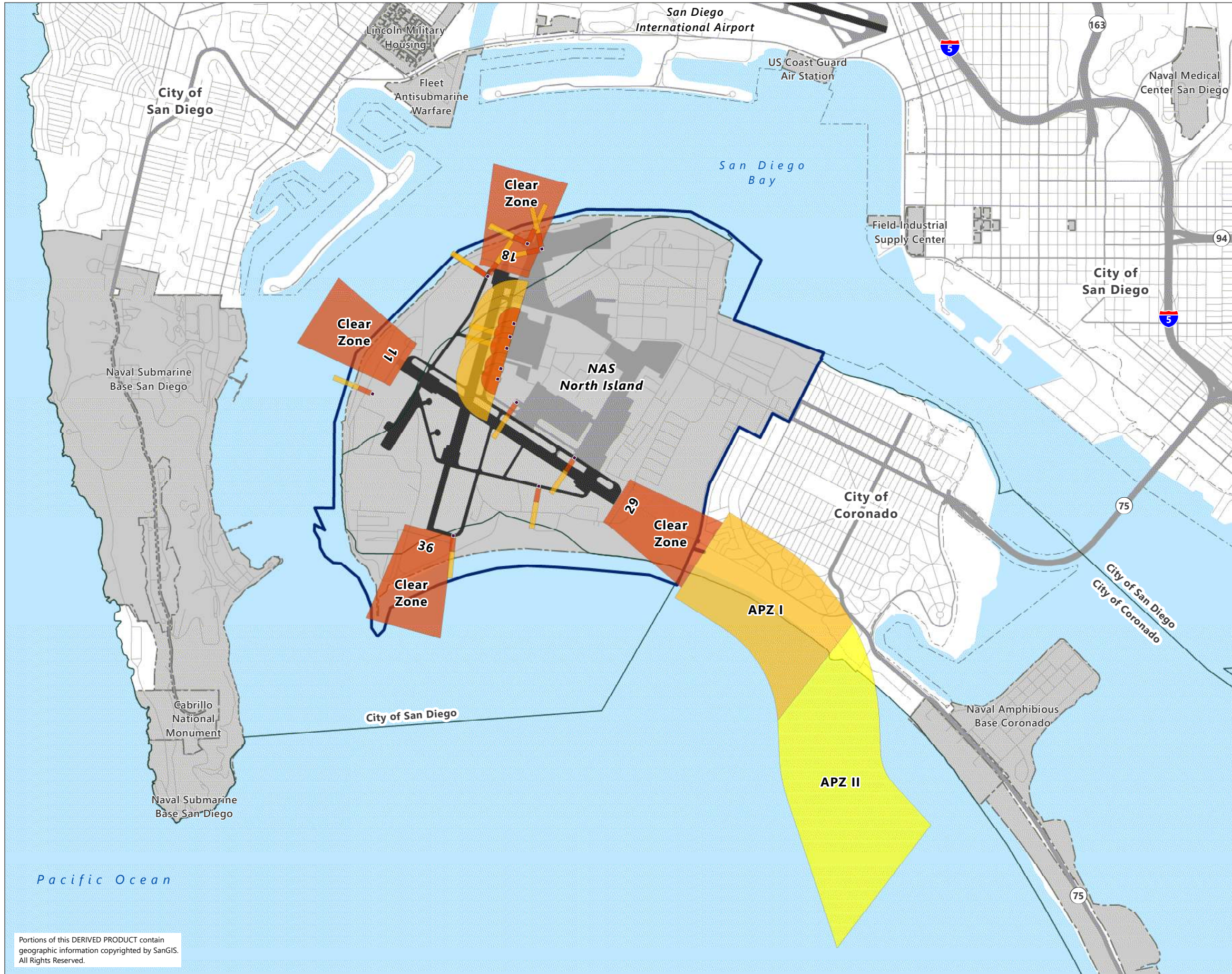
Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries, college districts); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 4-8 on page 4-12 (CNEL contours).

Prepared By: Ricondo & Associates, Inc., August 2019.

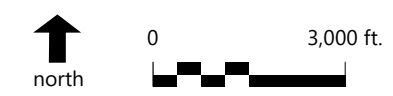
**Exhibit 3-7
NASNI Noise
Exposure Contours**

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- LEGEND**
- Major Roads
 - Highways
 - ▭ Naval Air Station Property Boundary
 - ▭ Federal Lands
 - ▭ San Diego Unified Port District
 - ▭ Municipal Boundaries
 - ▭ Water
 - ▭ Clear Zone
 - ▭ Accident Potential Zone (APZ) I
 - ▭ Accident Potential Zone (APZ) II
 - ▭ Helipad



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 5-3 on page 5-7 (safety zones).
Prepared By: Ricondo & Associates, Inc., August 2019.

Exhibit 3-8

NASNI Safety Zones

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- **Circulation Element.** The circulation element functions in concert with the land use element and establishes the location of transportation routes, ports, and associated public utilities.
- **Housing Element.** The housing element identifies existing and future housing needs and establishes plans to meet those needs. The housing element is subject to state agency review and is required to be revised and resubmitted at four- or eight-year intervals.⁴⁵
- **Conservation Element.** The goals, objectives, and policies of the conservation element are geared toward the protection and use of natural resources within the jurisdiction.
- **Open Space Element.** The open space element addresses the provision of open space and parks in the jurisdiction.
- **Noise Element.** The noise element addresses potential noise problems related to automobile traffic, railways, aviation, industrial facilities, and other fixed-position noise nuisances including military bases.
- **Safety Element.** The safety element addresses the protection of the jurisdiction from seismic hazards, flooding, and wildfires as well as any items associated with such hazards.⁴⁶

An additional element, environmental justice, is required for local governments with a statutorily defined disadvantaged community.⁴⁷ The environmental justice element establishes goals, objectives, and policies intended to address risks to health, safety, and welfare in specifically identified disadvantaged communities or areas. The California General Plan guidelines provide the following additional information.

“Disadvantaged communities’ means an area identified by the California Environmental Protection Agency Pursuant to Section 39711 of the Health and Safety Code OR an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.”⁴⁸

The statute further defines “low-income area” to mean “an area with household incomes at or below 80 percent of the statewide median income OR with household incomes at or below the threshold designated as low income by the Department of Housing and Community Development’s list of state income limits adopted pursuant to Section 50093.”⁴⁹

An air quality element is required for cities and counties within the San Joaquin Valley Air Pollution Control District (SJVAPCD).⁵⁰ The air quality element is not required in San Diego County.

Jurisdictions with land area inside the Project Area that are required to prepare and adopt general plans include:

- The City of Chula Vista (Chula Vista Vision 2020, December 13, 2005)
- The City of Coronado (City of Coronado General Plan, November 11, 1986)

⁴⁵ Governor’s Office of Planning and Research, State of California, *State of California General Plan Guidelines 2017*, October 2017, p. 4:89.

⁴⁶ Governor’s Office of Planning and Research, State of California, *State of California General Plan Guidelines 2017*, October 2017, pp. 42 – 163.

⁴⁷ Governor’s Office of Planning and Research, State of California, *State of California General Plan Guidelines 2017*, October 2017, p. 167.

⁴⁸ California Government Code § 65302(h)(4)(A).

⁴⁹ California Government Code § 65302(h)(4)(C).

⁵⁰ Governor’s Office of Planning and Research, State of California, *State of California General Plan Guidelines 2017*, October 2017, p. 186.

- The City of National City (National City General Plan, June 7, 2011)
- The City of San Diego (City of San Diego General Plan, March 10, 2008)

3.4.3 COMMUNITY PLANS

The City of San Diego has designated community planning areas (CPAs) for which plans are prepared to guide development at the local level. Community plans are considered part of the general plan. Community plans allow planning agencies to formulate goals, objectives, and policies for guiding development in a manner that is responsive to the unique geographic and cultural conditions of each CPA.

Twelve of the City of San Diego's CPAs are entirely or partially within the Project Area, as depicted on **Exhibit 3-9**. Only one CPA, Peninsula, is partially within the 65 CNEL noise contour, but the affected land is under the jurisdiction of the San Diego Unified Port District, so the Peninsula Community Plan does not apply in that area. No CPAs are within the safety zones, as the safety zones are confined to the city of Coronado.⁵¹ The following community plans apply within the Project Area:

- Barrio Logan / Harbor 101 Community Plan, November 30, 1978
- Clairemont Mesa Community Plan, September 26, 1989
- Downtown Community Plan, March 14, 2006
- Golden Hill Community Plan, October 25, 2016
- Linda Vista Community Plan, December 1, 1998
- Midway / Pacific Highway Corridor Community Plan, September 17, 2018
- Mission Valley Community Plan, September 10, 2019
- Ocean Beach Community Plan, November 9, 2015
- Old Town San Diego Community Plan, October 29, 2018
- Peninsula Community Plan, July 14, 1987
- Southeastern San Diego Community Plan, November 16, 2015
- Uptown Community Plan, November 14, 2016

3.4.4 SPECIFIC PLANS

A specific plan is a means of implementing the policies of a general plan for development proposals within a defined area.⁵² All or parts of seven specific plan areas are within the Project Area.

- **Atlas Specific Plan (City of San Diego).** The Atlas Specific Plan Area is a non-contiguous series of areas along Interstate 8 in the Mission Valley CPA. The specific plan guides development of hotels, offices, and related uses on the several sites comprising the specific plan area.⁵³

⁵¹ The portion of the Peninsula Community Planning Area within the NAS North Island AIA Review Area 1 is under the land use authority of the Unified Port of San Diego.

⁵² Governor's Office of Planning and Research, State of California, *The Planner's Guide to Specific Plans*, January 2001, p. 4.

⁵³ P&D Technologies, Inc., *Atlas Specific Plan*, December 13, 1988, pp. 3-1-3-5.

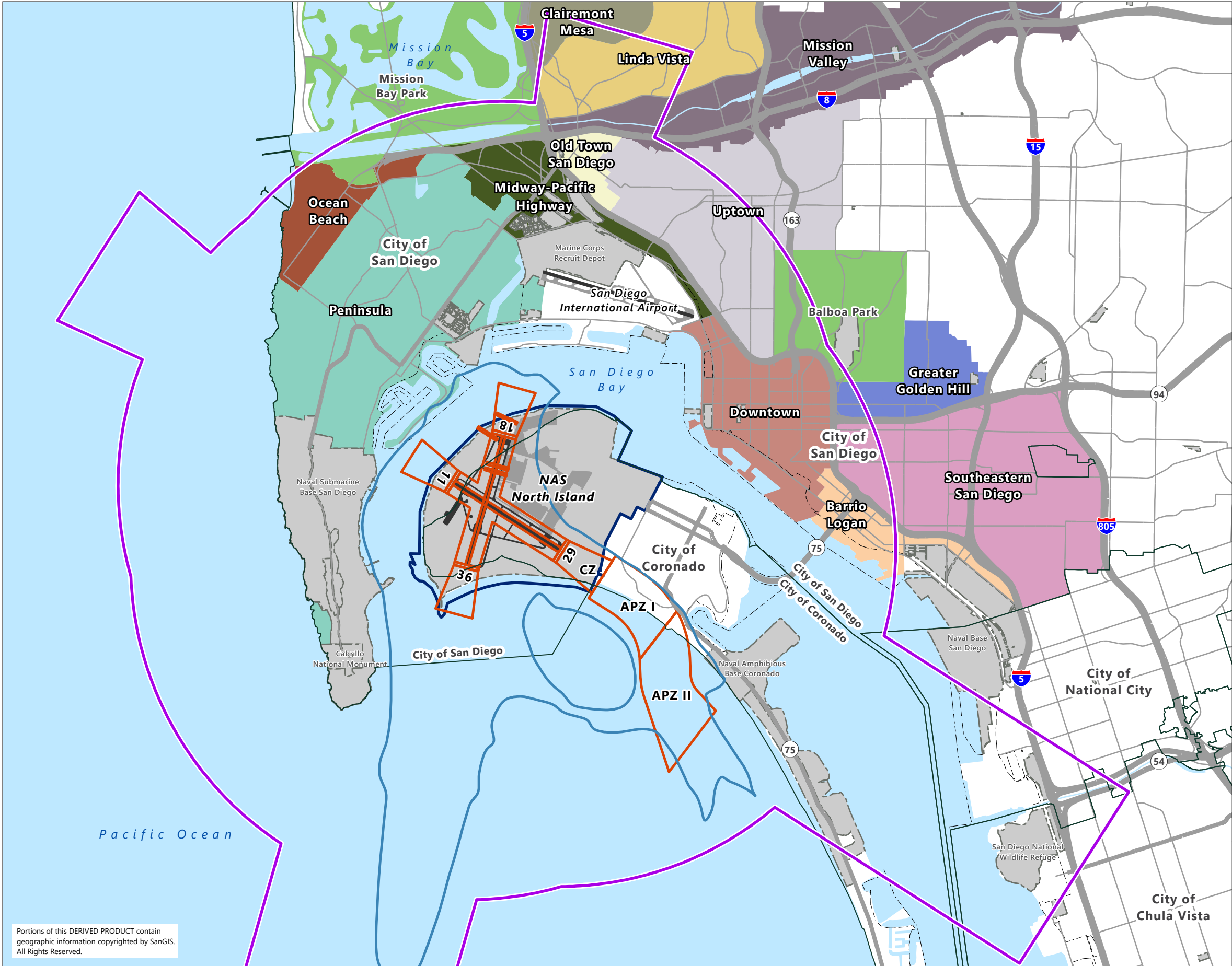
LEGEND

- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- ▭ San Diego Unified Port District
- ▭ Municipal Boundaries
- Airspace Protection Boundary, EIR Project Area
- 65 dB CNEL Contour
- Safety Zone Boundaries
- Water



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); City of San Diego, Planning Department, 2019 (community planning areas); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); Figure 4-8 on page 4-12 (CNEL contours); Figure 5-3 on page 5-7 (safety zones).
 Prepared By: Ricondo & Associates, Inc., September 2019.

Exhibit 3-9
City of San Diego Community Planning Areas within the EIR Project Area



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- **Bayfront Specific Plan (City of Chula Vista).** The Bayfront Specific Plan is the implementation program for the Chula Vista local coastal program.⁵⁴ The specific plan calls for commercial, industrial, and residential land uses.
- **Levi-Cushman Specific Plan (City of San Diego).** The Levi-Cushman Specific Plan Area is a 200-acre development on the north side of Interstate 8 along the San Diego River in the Mission Valley Community Planning Area. The specific plan prescribes a mix of residential, commercial, and recreational uses.⁵⁵
- **NTC Precise Plan (City of San Diego).** The NTC Precise Plan guides redevelopment of the former Naval Training Center San Diego site. The 360-acre site is intended to support a mix of residential, commercial, recreational, and institutional land uses.⁵⁶
- **Orange Avenue Corridor Specific Plan (City of Coronado).** The Orange Avenue Corridor Specific Plan (OACSP) applies to an area along Orange Avenue in the city of Coronado stretching from First Street south to Adella Avenue and R.H. Dana Place. The specific plan features commercial, multi-family, civic, and open space uses.⁵⁷ The OACSP is the only specific plan that applies within the boundaries of the ALUCP safety zones and noise contours.
- **Westside Specific Plan (National City).** The Westside Specific Plan Area applies to Old Town National City and is partially intersected by the Project Area. The specific plan calls for preserving existing residential uses while enhancing commercial land uses near major traffic corridors.⁵⁸

3.4.5 MUNICIPAL ZONING ORDINANCES

A zoning ordinance is the means through which a municipality or county implements the land use policies of a general, community, or specific plan. The zoning ordinance prescribes land use and development standards including limits on building heights, residential density, and development intensity. The following municipal zoning ordinances are applicable within the Project Area:

- Chula Vista Municipal Code, Title 19, Planning and Zoning
- City of Coronado Municipal Code, Title 86, Zoning – this is the only zoning ordinance applicable within the noise and safety zones
- City of National City, Chapter 18, Zoning Ordinance
- City of San Diego Municipal Code, Chapter 13, Zones; Chapter 15, Planned Districts

3.4.6 SAN DIEGO UNIFIED PORT DISTRICT PORT MASTER PLAN

The Port Master Plan is the document guiding the development of the tidelands and submerged areas within the land entrusted to the Port District by the State of California.⁵⁹ The Port Master Plan governs the development of an area comprising 5,483 acres within the Port District tidelands. Aside from military facilities, land uses in the Port District include commercial, industrial, and recreational uses. Residential development is not allowed in the tidelands. The Port Master Plan divides the port tidelands into ten smaller Planning Districts where Precise Plans apply. The Precise Plans include land use policies and regulations tailored to achieve specific development outcomes

⁵⁴ City of Chula Vista, *Bayfront Specific Plan*, September 2012, amended August 11, 2015, p. 1.

⁵⁵ Rick Engineering Company, *Levi-Cushman Specific Plan*, August 1987, p. 15.

⁵⁶ Rick Planning Group, *NTC Precise Plan and Local Coastal Program*, September 2001, p. Executive Summary – 1.

⁵⁷ City of Coronado, *Orange Avenue Corridor Specific Plan*, November 4, 2003, p. 7.

⁵⁸ City of National City, *Final Westside Specific Plan*, March 2010, p. 29.

⁵⁹ Port of San Diego, *Port Master Plan, San Diego Unified Port District*, 2017, including all amendments through 2016, p. 1.

in each Planning District.⁶⁰ Two Precise Plans, Shelter Island, Planning District 1, and Coronado Bayfront, Planning District 6, apply within the area covered by the 65 dB CNEL contour.

Five other Planning Districts are within the Project Area but outside any noise contours and safety zones – 2 – Harbor Island; 3 – Center City Embarcadero; 4 – Tenth Avenue Marine Terminal; 5 – National City Bayfront; 6 – Coronado Bayfront; and 7 – Chula Vista Bayfront.

3.4.7 AIRPORT LAND USE COMPATIBILITY PLANS

The proposed AIA intersects with the AIAs of four other airports in San Diego County with adopted ALUCPs, including San Diego International Airport (SDIA), NOLF IB, Brown Field Municipal Airport, and Montgomery–Gibbs Executive Airport. The overlap of the proposed AIA with the other airport AIAs is depicted on **Exhibit 3-10**. The areas of overlap would be subject to the provisions of both the NASNI ALUCP and the ALUCP of the other airports. Specifically, the areas of overlap with the San Diego International Airport and Montgomery-Gibbs Airport AIAs would be subject to the airspace and overflight notification policies and standards of the NASNI ALUCP. The areas of overlap with the NOLF IB and Brown Field Municipal Airport AIAs would be subject only to the overflight notification policy of the NASNI ALUCP.

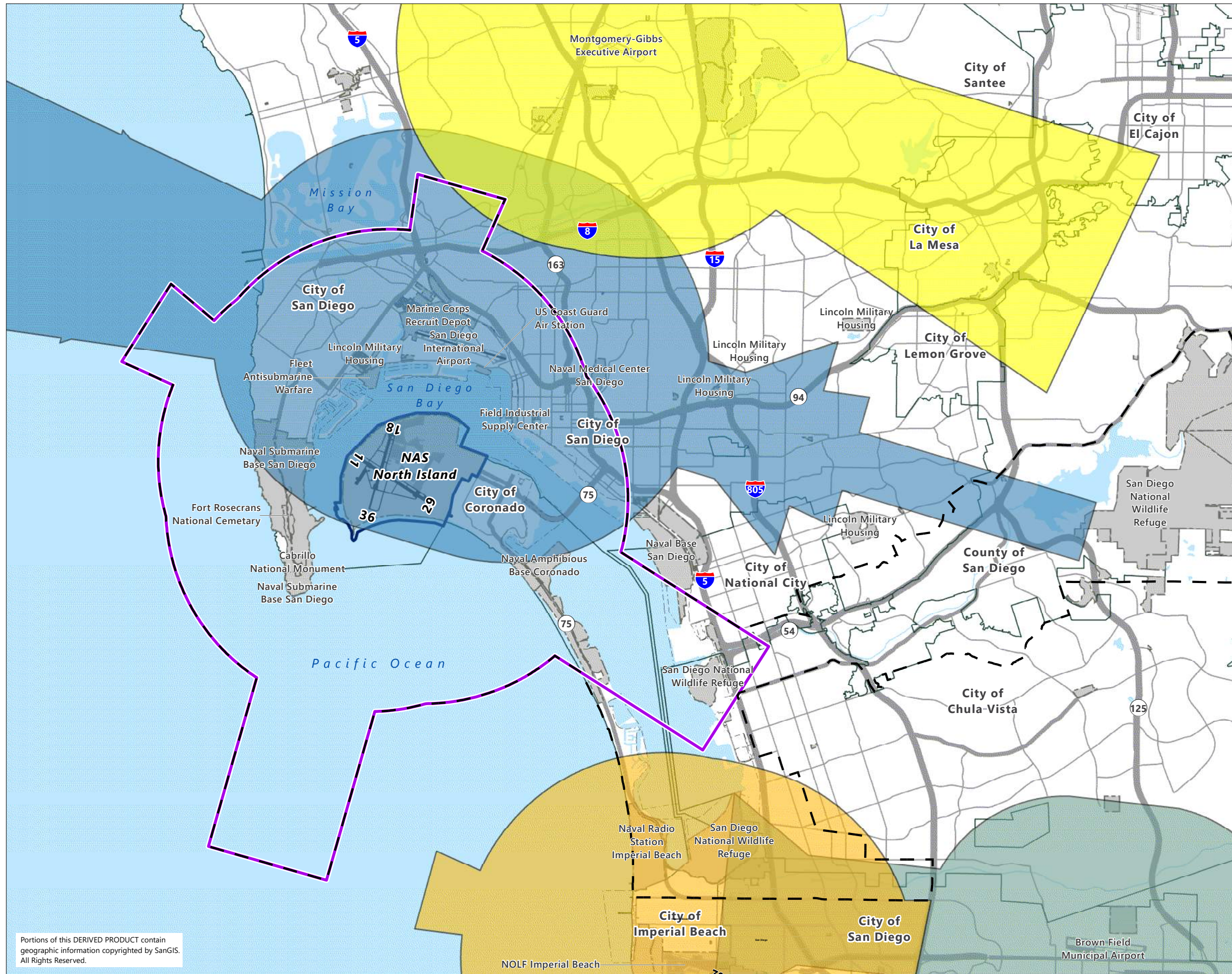
3.4.8 HOTEL DEL CORONADO AMENDED MASTER PLAN

The Hotel del Coronado is situated entirely within the 65 dB CNEL contour and is partly within safety zones APZ I and APZ II. Part of the Hotel is outside the safety zones. The Hotel del Coronado Master Plan was approved in 2002, and an amended plan was approved by the California Coastal Commission in 2010 after revisions were made to address the discovery of a geologic fault zone on the hotel property.⁶¹ The plan proposes a new conference center, 144 new guest rooms, 165 additional parking spaces, and improved public beach access.⁶²

⁶⁰ Port of San Diego, *Port Master Plan, San Diego Unified Port District*, 2017, including all amendments through 2016, p. 41.

⁶¹ Hotel del Coronado, *Hotel del Coronado Amended Master Plan*, August 2010, p. 1-1; California Coastal Commission, Coastal Development Permit, Permit Application No. A-6-COR-08 098 & 099

⁶² As this EIR was being prepared, construction was begun on the Hotel del Coronado amended master plan development.



LEGEND

- Major Roads
- Highways
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- - - San Diego Unified Port District
- ▭ Municipal Boundaries
- ▭ NASNI Airport Influence Area: the AIA is the area within which real estate disclosure is required per State law.*
- ▭ Airspace Protection Boundary, EIR Project Area
- ▭ Montgomery-Gibbs Executive Airport AIA
- ▭ NOLF Imperial Beach AIA
- ▭ Brown Field Municipal Airport AIA
- ▭ San Diego International Airport AIA
- ▭ Water

* California Business and Professions Code Section 11010(b) (13); California Civil Code, Sections 1103.4 and 1353 (a)(1).



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); San Diego County Regional Airport Authority, 2017 (airport influence area boundaries).
 Prepared By: Ricondo & Associates, Inc., October 2019.

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Exhibit 3-10
Airport Influence Areas
Overlapping the NASNI AIA

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4. ENVIRONMENTAL IMPACTS

4.1 INTRODUCTION

As a land use planning document, the proposed Airport Land Use Compatibility Plan (ALUCP) could potentially cause environmental impacts in areas where ALUCP implementation could result in changes to the land use plans and regulations that are currently in place. The potential changes could lead to different patterns of development than would otherwise occur. The subject of this section is to determine whether the potential changes to the land use plans and regulations may result in significant environmental impacts.

This section presents an assessment of the environmental impacts of the proposed ALUCP to land use and planning, the only California Environmental Quality Act (CEQA) environmental category for which the Proposed Project was found to have a potential for significant impacts. This assessment is based on information developed during the Initial Study, comments received at the scoping meeting and information received during the response period for the Notice of Preparation (NOP). As required by CEQA, this Draft Environmental Impact Report (Draft EIR or DEIR) identifies and discusses significant environmental impacts of the Proposed Project, significant environmental impacts that cannot be avoided if the Proposed Project is implemented, significant irreversible environmental changes associated with the Proposed Project should it be implemented, growth-inducing impacts of the Proposed Project, cumulative impacts, and mitigation measures proposed to minimize significant impacts.

4.1.1 ALUCP POLICY OVERVIEW

The proposed ALUCP, if implemented, would impose new land use policies and standards throughout the Project Area – the area that includes the airspace protection boundary, the proposed safety zones, and areas exposed to noise above 65 decibel (dB) Community Noise Equivalent Level (CNEL). In these areas, certain future land uses would be considered incompatible, and many others would be compatible only if specified standards are met. In the parts of the Airport Influence Area (AIA) outside the Project Area, only the overflight policy would apply, which would result in no restrictions on future land uses and development density and intensity. The Project Area is depicted on Exhibit 2-3 in Section 2.¹

- **Noise and Safety.** The proposed ALUCP noise and safety policies and standards have the potential to impact future development by identifying some new nonresidential uses as incompatible within the noise contours and safety zones. Those policies would also limit the density of residential land uses (in terms of dwelling units per acre) and the intensity of nonresidential land uses (in terms of gross square footage).
- **Airspace Protection.** The proposed ALUCP airspace protection policies involve no changes to limits currently set by applicable Federal Aviation Administration (FAA)² and State of California³ regulations. The proposed ALUCP clarifies the applicability of FAA and State regulations within the airspace protection boundary and includes policies intended to ensure compliance with those regulations by local agencies. The airspace protection policies and standards include limits on selected land uses and development features that could

¹ The outer boundaries of the AIA are defined by the combined boundaries of the noise contours, the safety zones, the airspace protection area, and the overflight notification area. The overflight notification area is the largest of these factor boundaries. The EIR Project Area is defined as the area within the airspace protection boundary (which includes the noise contours and safety zones), excluding the parts of the overflight notification area outside that boundary.

² 14 CFR 77.9 and 77.11.

³ California Public Utilities Code, §§ 21657, 21659(b).

compromise flight safety. These limits include the avoidance of land uses and building materials that would cause glare/glint; thermal plumes; or dust, smoke, or vapor sufficient to interfere with the safe control of aircraft. In addition, lighting that could be confused with airport identification and navigational lighting, electromagnetic interference with communications and navigation equipment, and wildlife attractants would also be limited.

- **Overflight.** Within the overflight notification area, the proposed ALUCP would require measures ensuring that prospective buyers of new dwellings built in the overflight notification area are notified of the potential for aircraft overflight and related annoyances. No restrictions on land use or the density and intensity of development would apply to areas lying only within the overflight notification area boundary.

4.1.2 FINDINGS OF INITIAL STUDY – POTENTIAL ENVIRONMENTAL IMPACTS

The Initial Study considered the potential impact of the proposed ALUCP on all CEQA resource categories.⁴ **Table 4-1** shows these findings for each CEQA category. The potential for significant impact was found for only one environmental category – land use and planning.

TABLE 4-1 SUMMARY OF INITIAL STUDY FINDINGS

| CEQA CATEGORY | POTENTIAL SIGNIFICANT IMPACT | LESS THAN SIGNIFICANT IMPACT | NO IMPACT |
|------------------------------------|------------------------------|------------------------------|-----------|
| Aesthetics | | • | |
| Agriculture and Forestry Resources | | | • |
| Air Quality | | • | |
| Biological Resources | | • | |
| Cultural Resources | | • | |
| Energy | | • | |
| Geology and Soils | | • | |
| Greenhouse Gas Emissions | | • | |
| Hazards and Hazardous Materials | | • | |
| Hydrology and Water Quality | | • | |
| Land Use and Planning | • | | |
| Mineral Resources | | • | |
| Noise | | • | |
| Population and Housing | | • | |
| Public Services | | • | |
| Recreation | | • | |
| Transportation | | • | |
| Tribal Cultural Resources | | • | |
| Utilities and Service Systems | | • | |
| Wildfire | | • | |

SOURCE: Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019, pp. 4-1 – 4-47.

⁴ Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019. The Initial Study is included in this EIR as Appendix A.

The Initial Study⁵ acknowledged the potential for indirect environmental impacts that could result from the shifting of future residential and other noise- or risk-sensitive land uses to locations elsewhere in the metropolitan area designated or zoned to allow them.⁶ Any such shifts in development are speculative and uncertain from a timing and location standpoint. Therefore, any potential environmental impacts associated with such shifts in development must necessarily be analyzed at the specific project level when and if development is proposed.

4.2 LAND USE AND PLANNING

This section addresses the potential impacts of the proposed ALUCP on land use and planning. A summary of the affected existing land use plans is presented, followed by a comparison with the land uses that would be permissible after implementation of the proposed ALUCP. Conflicts between the proposed ALUCP and the existing plans and zoning are described and the potential effects on the development capacity within the ALUCP Project Area are analyzed.

4.2.1 METHODOLOGY

The analysis is based, in part, on Appendix A of the Initial Study, *Analysis of Potentially Displaced Development*,⁷ Appendix B of this EIR, *Revised Analysis of Potentially Displaced Development – Hotel del Coronado*, and Appendix D of this EIR, *Corrections to Initial Study Analysis of Potentially Displaced Development*. The effects of the proposed ALUCP on land use and planning are described as the amount of land that would become unavailable for the development of new incompatible uses, the number of potential dwelling units, and the amount of nonresidential floor area that could be potentially displaced from the ALUCP Project Area after implementation of the proposed ALUCP.

Only one local agency, the City of Coronado, is potentially subject to the displacement of future development with implementation of the ALUCP. Although the area subject to potential development displacement is currently fully developed, not all land is developed to the maximum density and intensity allowed under Coronado's current zoning. This analysis considers the potential displacement that could occur if the area was developed to the maximum level allowed by current zoning. In addition to establishing limits on future residential densities and nonresidential intensities, implementation of the proposed ALUCP would result in certain sensitive uses as being incompatible within certain noise contour ranges and safety zones.

The displacement analyses quantify the amount of future development currently allowed under the City's General Plan and Zoning Code, in terms of dwelling units and nonresidential floor area, that could potentially be displaced from the areas subject to more restrictive land use controls after the City's implementation of the ALUCP. The analysis also quantifies the amount of land area that could be subject to the displacement of new land uses that would be incompatible within the noise contours and safety zones after adoption and implementation of the ALUCP.

⁵ The Initial Study is included in this EIR as Appendix A.

⁶ This potential outcome would depend on whether the affected local agencies implement the ALUCP. Based on state law, local agencies are authorized to amend their land use plans and regulations to fully implement the ALUCP or to overrule the ALUCP and leave their land use plans and regulations unchanged. They may also decide to implement parts of the ALUCP and overrule other parts [California Public Utilities Code §§ 21676(a) and 21676.5.]

⁷ Airport Land Use Commission, San Diego County Regional Airport Authority, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019. The Initial Study is included in this EIR as Appendix A.

4.2.2 EXISTING REGULATORY SETTING

This section describes the land use plans currently applicable within the safety zones and 65 dB CNEL and higher noise contours – the area within which the Initial Study found the potential for significant impacts on land use and planning (referred to as the Area of Potential Impact).⁸ This area covers part of the city of Coronado and a small portion of the city of San Diego on Shelter Island which falls under the land use authority of the San Diego Unified Port District (the Port District). The portion of Coronado within the Area of Potential Impact is almost fully developed.

The land use planning framework within the Area of Potential Impact is comprised of the City of Coronado General Plan, City of Coronado Zoning Code, the Orange Avenue Corridor Specific Plan, the Coronado Historic Resources Code, and the Port District Master Plan.

4.2.2.1 CITY OF CORONADO GENERAL PLAN

The City of Coronado General Plan, adopted in November 1986 and most recently amended in February 2013, establishes planning and development policies for the City of Coronado. The General Plan includes the following elements: Land Use, Public Facilities, Recreation, Parking, Circulation, Transportation, Housing, Historic Preservation, Community Design, Disaster Preparedness, Safety, Noise, Open Space, Conservation, Scenic Highway, Local Coastal, and Bay.

The following elements of the General Plan, which include goals, objectives, and policies directly or indirectly applying to airport land use compatibility, are summarized in this section.⁹

- Land Use Element
- Historic Preservation Element
- Housing Element
- Local Coastal Program Land Use Plan
- Noise Element
- Open Space Element
- Public Facilities Element
- Safety Element

Land Use Element

The land use element of the Coronado General Plan includes policies and goals related to land development. The land use designations in the General Plan are identical to the City of Coronado's zoning designations, which closely

⁸ The ALUCP Project Area, depicted on Exhibit 2-3 in Section 2, includes the area within the proposed 65 dB CNEL contour and the proposed safety zones. Within that area, the proposed ALUCP would establish policies and standards declaring the development of certain future land uses as incompatible and would limit the density and intensity of other future land uses. This area within the 65 dB CNEL contour and the safety zones is referred to as the Area of Potential Impact.

⁹ Several elements of the Coronado General Plan do not relate to the proposed policies and standards of the ALUCP, including the Bay Element, the Circulation Element, the Community Design Element, the Conservation Element, the Disaster Preparedness Element, the Parking Element, the Recreation Element, and the Scenic Highway Element, and the Transportation Element.

resemble the existing land use pattern. As stated in the General Plan, “since the City is nearly completely developed, each area of the City should have the same land use depicted for it on the General Plan and Zoning Maps.”¹⁰

The land use goals outlined in the General Plan are:¹¹

1. That adjoining land uses should be compatible and sensitive to one another;
2. That sufficient alternative land use opportunities should be allowed within the City to permit Coronado to be a viable, healthy, and nearly self-contained community;
3. That the residential character and village ambiance of the City should be maintained and enhanced;
4. That the intensity of land use, as evidenced by permitted land uses or residential density, should be established in a manner to encourage a vibrant diverse community by allowing a variety of life styles and housing opportunities;
5. That preservation of historic structures and neighborhoods should be encouraged;
6. That protection or enhancement of environmentally sensitive land areas should be encouraged when the sum total of the tangible and intangible public benefits of such preservation or enhancement is greater than the public benefits of the development;
7. That private property rights, as established by law, should be respected and preserved;
8. That the sum total of the tangible and intangible public benefits derived from public land should be maximized; and
9. That the “built-out” nature of Coronado should be acknowledged by maintaining identical land uses for the City in the Coronado Municipal Code, General Plan, and Local Coastal Program.

Exhibit 4-1 depicts the zoning in the City of Coronado, which reflects the land use designations of the Land Use Element of the General Plan, as specifically intended in Goal 9.

Historic Preservation Element

Coronado’s Historic Preservation Element identifies the goals and objectives of its historic preservation program, how that program can be encouraged and supported, the process that should be used to designate structures, sites, parks, and other resources as historic, and the regulations and benefits for resources which have been designated historic.¹² The overall goal of the Historic Preservation Element is to “develop and implement a historic preservation program that energizes the citizens of Coronado to actively rehabilitate and preserve important historic resources within the community such as objects, buildings, structures, sites, landmarks, areas, or places that are historically or archeologically significant or are significant in terms of architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural history.”¹³

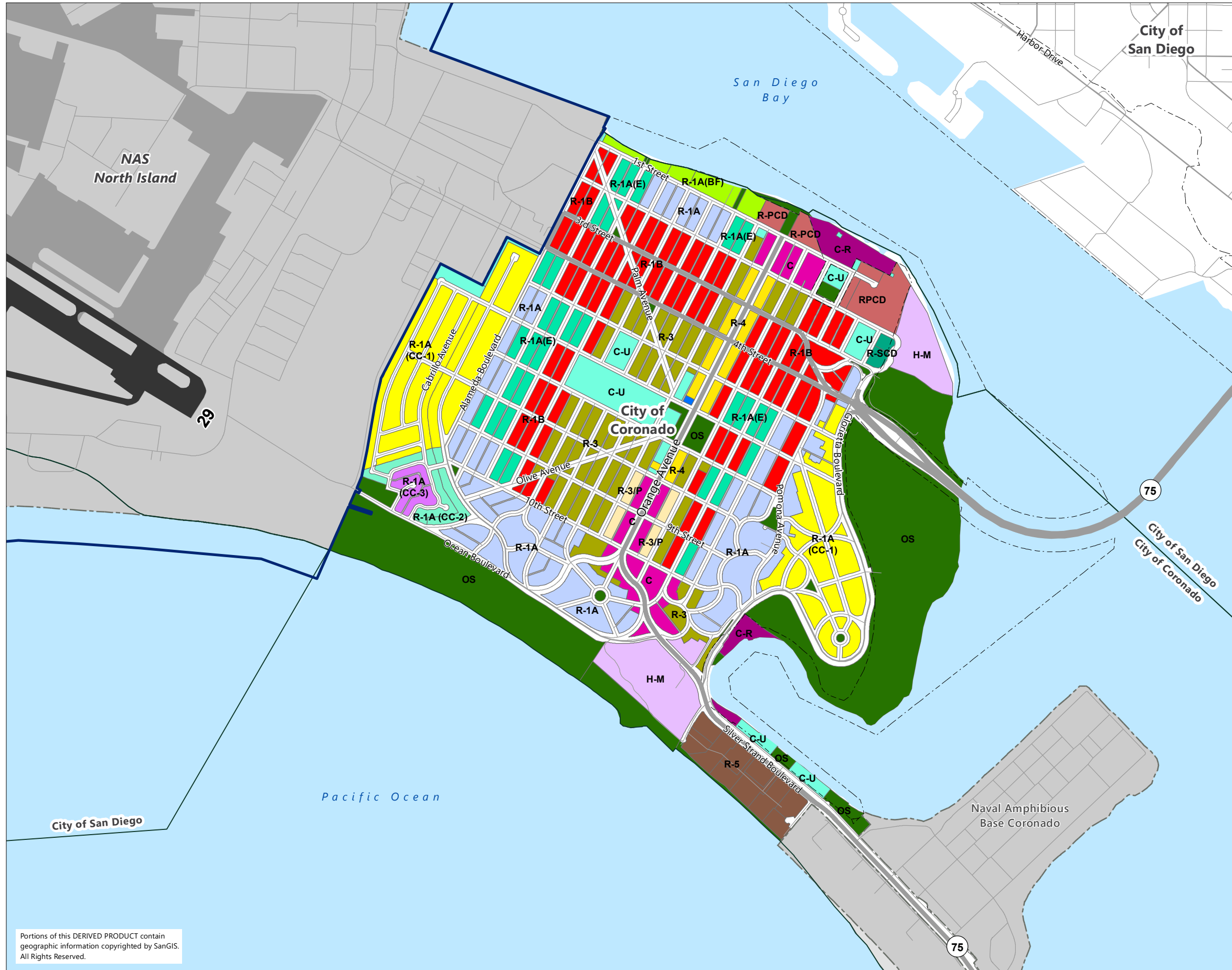
¹⁰ *City of Coronado General Plan*, Chapter A, Land Use Element, November 11, 1986, August 6, 1996 and November 4, 2003 (Revised), p. II-A5, Figure 1, Coronado Land Use Vicinity Map, Figure 2, Coronado Zoning Map.

¹¹ *City of Coronado General Plan*, Chapter A, Land Use Element, November 11, 1986, August 6, 1996 and November 4, 2003 (Revised), p. II-A4

¹² *City of Coronado General Plan*, Chapter H, Historic Preservation Element, January 5, 1999, June 15, 2004 (Revised), p. II-Hi.

¹³ *City of Coronado General Plan*, Chapter H, Historic Preservation Element, January 5, 1999, June 15, 2004 (Revised), p. II-H2.

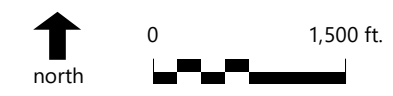
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**AIRPORT
LAND USE
COMMISSION**

LEGEND

- Major Roads
 - Highways
 - ▭ Naval Air Station Property Boundary
 - ▭ Federal Lands
 - ▭ San Diego Unified Port District
 - ▭ Municipal Boundaries
 - ▭ Water
- Existing Zoning and Minimum Residential Lot Size or Maximum Density**
- ▭ R-1A(BF) - Single Family Residential (7,500 sq ft)
 - ▭ R-1A(CC-1) - Single Family Residential (7,500 sq ft)
 - ▭ R-1A(CC-2) - Single Family Residential (6,600 sq ft)
 - ▭ R-1A(CC-3) - Single Family Residential (6,000 sq ft)
 - ▭ R-1A - Single Family Residential (5,500 sq ft)
 - ▭ R-1A(E) - Single Family Residential (5,250 sq ft)
 - ▭ R-1B - Single Family Residential (3,500 sq ft)
 - ▭ R-3 - Multifamily Residential (28 du/ac)
 - ▭ R-3/P - Multifamily Residential (28 du/ac) Parking Overlay
 - ▭ R-4 - Multifamily Residential (40 du/ac)
 - ▭ R-4/CU - Multifamily Residential (40 du/ac) Civic Use Overlay
 - ▭ R-5 - Multifamily Residential (47 du/ac)
 - ▭ R-PCD - Residential - Planned Community Development
 - ▭ R-SCD - Residential - Special Care Development
 - ▭ C - Commercial
 - ▭ C-R - Commercial Recreation
 - ▭ H-M - Hotel-Motel
 - ▭ C-U - Civic Use
 - ▭ OS - Open Space
 - ▭ MZ - Military Zone



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pagelid=1619276>, accessed June 28, 2019, (zoning).

Prepared By: Ricondo & Associates, Inc., September 2019.

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**Exhibit 4-1
Current Zoning
in Coronado**

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Housing Element

The Housing Element states that the primary housing goal of the City of Coronado is to ensure its residents a variety of decent, safe, and affordable housing opportunities.¹⁴ The element lists the following goals:¹⁵

1. "To provide a broad range of housing opportunities to increase the housing options available to individuals"¹⁶
2. "To provide a broad range of affordable housing opportunities that serve the needs of people who work and live in the community"¹⁷
3. "To provide equal housing opportunities, accessible to all segments of society"¹⁸
4. "To encourage the conservation and maintenance of its housing stock, neighborhoods, and history"¹⁹
5. "To minimize governmental constraints to the development, improvement, and maintenance of housing, particularly affordable housing or housing accessible to persons with disabilities"²⁰

The Housing Element specifically addresses NASNI stating:²¹

In April of 2012, the U.S. Navy provided the City with a copy of its final Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and NOLF Imperial Beach. This document contains recommendations regarding Noise, Safety and Land Use measures that Coronado should consider for appropriate land uses and zoning in proximity to NASNI airport operations. The San Diego County Regional Airport Authority (SDCRAA) must incorporate the recommendations of the AICUZ when developing the State mandated Airport Land Use Compatibility Plan (ALUCP) for Coronado. The City's General Plan and zoning must be consistent with the ALUCP. The City is carefully evaluating what land use restrictions and noise attenuation requirements may be placed on development within the community. Per the Knight Act of 2002, The City has no control over the development restrictions assigned to new development by the AICUZ and ALUCP.²²

The Housing Element notes that the R-1A – Single-Family Residential zone, which accounts for most of the land in the safety zones, is expected to experience some minor redevelopment in the future, but little net increase in

¹⁴ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 89.

¹⁵ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, pp. 89 - 91.

¹⁶ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 89.

¹⁷ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 89.

¹⁸ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 90.

¹⁹ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 90.

²⁰ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 91.

²¹ City of Coronado *General Plan, Chapter G, 2013-2021 Housing Element*, March 6, 2013, p. 70.

²² *City of Coronado General Plan, Chapter G, 2013-2021 Housing Element*, p. 70. The last sentence in the quoted material is incorrect. The AICUZ does not assign any development restrictions. Rather, it advises the City regarding airport land use compatibility. The ALUC, however, must prepare an ALUCP that is "consistent with the safety and noise standards in the Air Installation Compatible Use Zone" study (California Public Utilities Code § 21675(b)). The City has options under state law for implementing or overriding the adopted ALUCP. First, it can amend its general plan, affected specific plans, and zoning ordinance to achieve consistency with the ALUCP (California Public Utilities Code § 21675.1(d); California Government Code § 65302.3). Alternatively, the City may overrule the ALUCP, or any part of the ALUCP, with a two-thirds vote, after making specific findings that the local agency's current land use plans and regulations fulfill the purposes of the ALUC statute (California Public Utilities Code §§ 21676, 21676.5).

housing units.²³ The Housing Element projects a need for 50 additional housing units by 2021. Seventeen housing opportunity sites, all in the R-4 – Multiple-Family Residential zone, were identified for meeting the additional housing needs.²⁴ These sites are all outside the ALUCP safety zones and therefore would not be subject to the safety policies and standards of the ALUCP.

Local Coastal Element and Local Coastal Program Land Use Plan

The Local Coastal Element is intended to ensure consistency between the General Plan and the City's Local Coastal Program. The stated goal of this element is "That the City shall comply with the requirements of the California Coastal Act of 1976 (as amended by the legislature) by compliance to its certified Local Coastal Program (LCP), and by the maintenance and updating of the Coronado LCP in a manner to assure that document remains current, relevant, and functional."²⁵

The Local Coastal Program (LCP) Land Use Plan was adopted in 1980 and most recently amended in 2005.²⁶ The LCP includes 61 policies in the following 8 program areas:²⁷

- Shoreline access
- Recreation and visitor serving facilities
- Water and marine resources / environmentally sensitive habitat areas
- Diking, dredging, filling, and shoreline structures
- Commercial fishing and recreational boating
- Hazard areas
- Visual resources and special communities
- Locating and planning new development

The policies are directed toward balancing the public needs for shoreline access, recreation, environmental preservation of sensitive areas and habitats, the prudent use of coastal and maritime resources, protection of existing coastal development from hazards, and future development along the coast.

Noise Element

The Noise Element states, "the major goals of the City of Coronado and its residents are to develop a comprehensive program to reduce noise to a level that is healthy and desirable, to promote public understanding of noise, and to maintain a high level of environment quality."²⁸

The Noise Element includes a noise sensitivity table, standards, and an interpretative table which, in combination, provide land use compatibility guidance.²⁹ The noise sensitivity table, reproduced as **Table 4-2**, describes four

²³ *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 45.

²⁴ *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 81.

²⁵ *City of Coronado General Plan*, Chapter P, Local Coastal Element, October 20, 1987, p. II-P2.

²⁶ *City of Coronado Local Coastal Program Land Use Plan*, 2005, pp. v – vi.

²⁷ *City of Coronado Local Coastal Program Land Use Plan*, 2005, pp. 6 – 17.

²⁸ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L7.

²⁹ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), pp. II-L5, II-L8, and II-L18.

degrees of sensitivity for various land uses by CNEL range: Clearly Acceptable, Normally Acceptable, Normally Unacceptable, and Clearly Unacceptable.

The Noise Element states that: “[r]esidential development should not be allowed in areas that are in Clearly Unacceptable or in Normally Unacceptable area... Residences may be constructed in Normally Unacceptable areas only if the proper precautions in construction are taken and sound barriers shall be required prior to construction.”³⁰ The implementation section of the Noise Element calls for the establishment of building code requirements ensuring adequate sound insulation, “especially in areas with a greater noise impact.”³¹ To date, the City has not adopted building code requirements for sound insulation.

According to Table 4-2, single-family homes as well as townhouses and apartments are considered normally unacceptable at levels between 65 dB and 75 dB CNEL. High-rise residences are considered normally unacceptable between 70 dB and 80 dB CNEL. With proper sound insulation, which is not currently required by the City of Coronado, single-family homes can be constructed in noise exposure areas up to 75 dB CNEL, and high-rise residences can be constructed in noise exposure areas as high as 80 dB CNEL.

Other land uses considered clearly or normally unacceptable at levels below 75 dB CNEL include hotels and motels; schools, churches, and libraries; auditoriums and concert halls; parks and playgrounds, and golf courses and riding stables. Schools, churches, libraries, auditoriums, and concert halls are considered normally unacceptable at levels down to 60 dB CNEL. Parks and playgrounds are considered normally unacceptable at levels between 65 dB and 75 dB CNEL. Hotels, motels, golf courses, and riding stables are normally unacceptable between 70 and 80 dB CNEL.

The Noise Element also includes a map of Noise Critical Areas.³² Noise Critical Areas are designated along major arterial streets and the area exposed to aircraft noise from NASNI.

Open Space Element

The open space goals of the City of Coronado outlined in the Open Space Element are:³³

1. To preserve and enhance or promote the preservation and enhancement of open space areas within the City...
2. To investigate possible acquisition of land that can be maintained or used for open space
3. To provide public access when appropriate to open space areas
4. To preserve and maintain public benefit beaches and salt ponds

The Open Space Element includes objectives, policies, and implementation measures to achieve the goals. It notes that because the city is almost fully developed, acquisition of large parcels of land for open space will be difficult. It advocates various measures to preserve existing open space. It also advises using appropriate environmental protection and public safety policies and programs to aid in achieving the open space goals.³⁴ For example, the preservation of salt ponds and seismic and flood hazard areas from development promotes open space goals while also achieving their primary purposes of habitat preservation and public safety enhancement.

³⁰ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L8.

³¹ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L15.

³² *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L12.

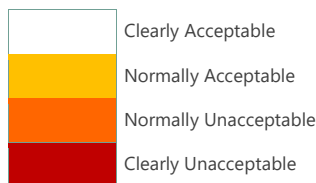
³³ *City of Coronado General Plan*, Chapter M, Open Space Element, November 15, 1994, August 6, 1996 (Revised), p. II-M2.

³⁴ *City of Coronado General Plan*, Chapter M, Open Space Element, November 15, 1994, August 6, 1996 (Revised), pp. II-M8 – II-M10.

TABLE 4-2 NOISE SENSITIVITY OF LAND USE – CITY OF CORONADO NOISE ELEMENT

| LAND USE | CNEL | | | | | | | | | |
|--|-------|-------|---------------------|-----------------------|-----------------------|----------------------|-----------------------|-----------------------|----------------------|----------------------|
| | 45-50 | 50-55 | 55-60 | 60-65 | 65-70 | 70-75 | 75-80 | 80-85 | 85-90 | 90-95 |
| Mobile Homes | | | | Normally Unacceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Single Family, Townhouses, Apartments | | | | Normally Unacceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| High Rise Residence | | | | Normally Unacceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Hotels, Motels | | | | Clearly Acceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Schools, Churches, Libraries | | | Normally Acceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Auditoriums, Concert Halls | | | Normally Acceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Parks, Playgrounds | | | | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Golf Courses, Riding Stables | | | | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Offices | | | | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Commercial-Retail, Movie Theaters, Restaurants | | | | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Commercial-Wholesale, Some Retail, Manufacturing | | | | Clearly Acceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Livestock Farming | | | | | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable | Clearly Unacceptable |
| Other Farming | | | | | | | Normally Unacceptable | Normally Unacceptable | Clearly Unacceptable | Clearly Unacceptable |

KEY TO TABLE:



SOURCE: City of Coronado, *City of Coronado General Plan*, Noise Element, September 17, 1974, April 20, 1999 (Revised), Figure 2. Color-coding by Ricondo & Associates, Inc.

Public Facilities Element

The Public Facilities Element of the General Plan focuses on “the publicly own [sic] facilities provided by the City and [Coronado Unified] School District, and upon the utility infrastructure provided by the City and other entities.”³⁵ As indicated in this element, “[t]he Public Facility Goals of the City are to appropriately design, locate, size, phase, construct, and maintain the City’s infrastructure and public buildings to:

1. Assure that the community’s residents and visitors are efficiently served in a cost-effective manner that preserves both the ambiance of the community and the quality of life of its citizens;
2. Assure that public services are provided in an equitable manner to all individuals and areas of the community; and
3. Assure that public services are provided in a manner to minimize negative environmental impacts when possible.”³⁶

³⁵ *City of Coronado General Plan*, Chapter B, Public Facilities Element, December 4, 2007, p. II-B1.

³⁶ *City of Coronado General Plan*, Chapter B, Public Facilities Element, December 4, 2007, p. II-B2.

As stated in the Public Facilities Element, there is no vacant land available in the city for new development to place added demand on the city's existing infrastructure or for the construction of new facilities to address any associated increase in demand.³⁷ No new public facilities or services are proposed in the ALUCP noise contours or safety zones.

Safety Element

The goals of the Safety Element of the Coronado General Plan are:³⁸

1. To reduce the risk of death, injury, property damage, or societal disruption from natural or man-caused disasters through effective advance planning, preparation, and public education
2. To be prepared to effectively document, respond to, and recover from calamities when they occur
3. To perform the aforementioned tasks in a cost-efficient manner with an appropriate amount of the limited resources available

The Safety Element also discusses NASNI. It describes how the City accommodates vehicles en route to NASNI carrying hazardous materials as well as the "unique hazards for the community" posed by NASNI airplane and helicopter flight paths.³⁹ The Safety Element includes a policy stating that "the most current 'Air Installations Compatible Use Zones Study' or a similar independent analysis will be consulted by the City prior to approval of any discretionary land use permit or approval that would modify the use, density or intensity of development permitted for a property in said Compatible Use Zones. "The purpose of the policy is "[t]o assure the continued viability of the North Island Naval Air Station's flight operations and minimize flight hazards and flight noise impacts to the public..."⁴⁰

4.2.2.2 CITY OF CORONADO ZONING CODE

While the General Plan establishes the goals, objectives, and policies directing growth in Coronado, the Zoning Code includes the regulations that implement those policies.⁴¹ California law requires that the zoning regulations must be based on the General Plan.⁴² Zoning codes establish districts or zones where specific sets of regulations are prescribed, including permitted land uses and development standards, such as lot coverage, building heights, residential dwelling unit densities, floor area ratios,⁴³ and off-street parking requirements. The regulations are intended to achieve the type and design of desired development as envisioned in the General Plan.

Exhibit 4-2 depicts the City's zoning designations within the proposed ALUCP noise contours and safety zones. **Table 4-3** lists the nine zoning designations located within the boundaries of the AICUZ safety zones.⁴⁴

³⁷ *City of Coronado General Plan*, Chapter B, Public Facilities Element, December 4, 2007, p. II-B2.

³⁸ *City of Coronado General Plan*, Chapter K, Safety Element, February 15, 2005, p. II-K1.

³⁹ *City of Coronado General Plan*, Chapter K, Safety Element, February 15, 2005, p. II-K16.

⁴⁰ *City of Coronado General Plan*, Chapter K, Safety Element, February 15, 2005, p. II-K22.

⁴¹ Coronado Municipal Code, Title 86, Zoning.

⁴² California Government Code, 2011, § 65860(a).

⁴³ Floor area ratio is the ratio of building floor area to the lot area.

⁴⁴ The MZ–Military Zone is not listed in the table. It applies only to military facilities, which are not subject to the ALUCP.

TABLE 4-3 CITY OF CORONADO ZONING DESIGNATIONS WITHIN AICUZ SAFETY ZONES

| SAFETY ZONES | SINGLE-FAMILY RESIDENTIAL | | | | MULTIPLE-FAMILY RESIDENTIAL | | COMMERCIAL | HOTEL-MOTEL | OPEN SPACE |
|-------------------------------------|---------------------------|-------------|-------------|-------------|-----------------------------|-----|------------|-------------|------------|
| | R-1A | R-1A (CC-1) | R-1A (CC-2) | R-1A (CC-3) | R-3 | R-5 | C | H-M | OS |
| Clear Zone (CZ) | | • | • | | | | | | • |
| Accident Potential Zone I (APZ I) | • | • | • | • | • | | • | • | • |
| Accident Potential Zone II (APZ II) | | | | | | • | | • | • |

SOURCES: City of Coronado Municipal Code, Chapter 86.06 Zoning Classifications, Chapter 88.02 Orange Avenue Corridor Specific Plan; City of Coronado, Coronado General Plan, Land Use Element, Figure 2, Coronado Zoning Map, page II-A5, revised November 04, 2003; United State Department of Navy, Naval Base Coronado, AICUZ Study Update for Naval Air Station North Island, Appendix C, Table C-2, 2011.

Four of the zoning districts listed in Table 4-3 have negligible practical development or redevelopment capacity. The portions of the R-1A (CC-1), R-1A (CC-2), R-1A (CC-3), and R-5 zoning districts within the Area of Potential Impact are developed to full capacity, based on the housing unit density limits established in the Coronado Zoning Code. The other five zoning districts, however, do have potential development capacity based on the City’s Zoning. Several provisions of the Zoning Code conflict with safety standards of the proposed ALUCP. Those conflicts are summarized in **Table 4-4**.

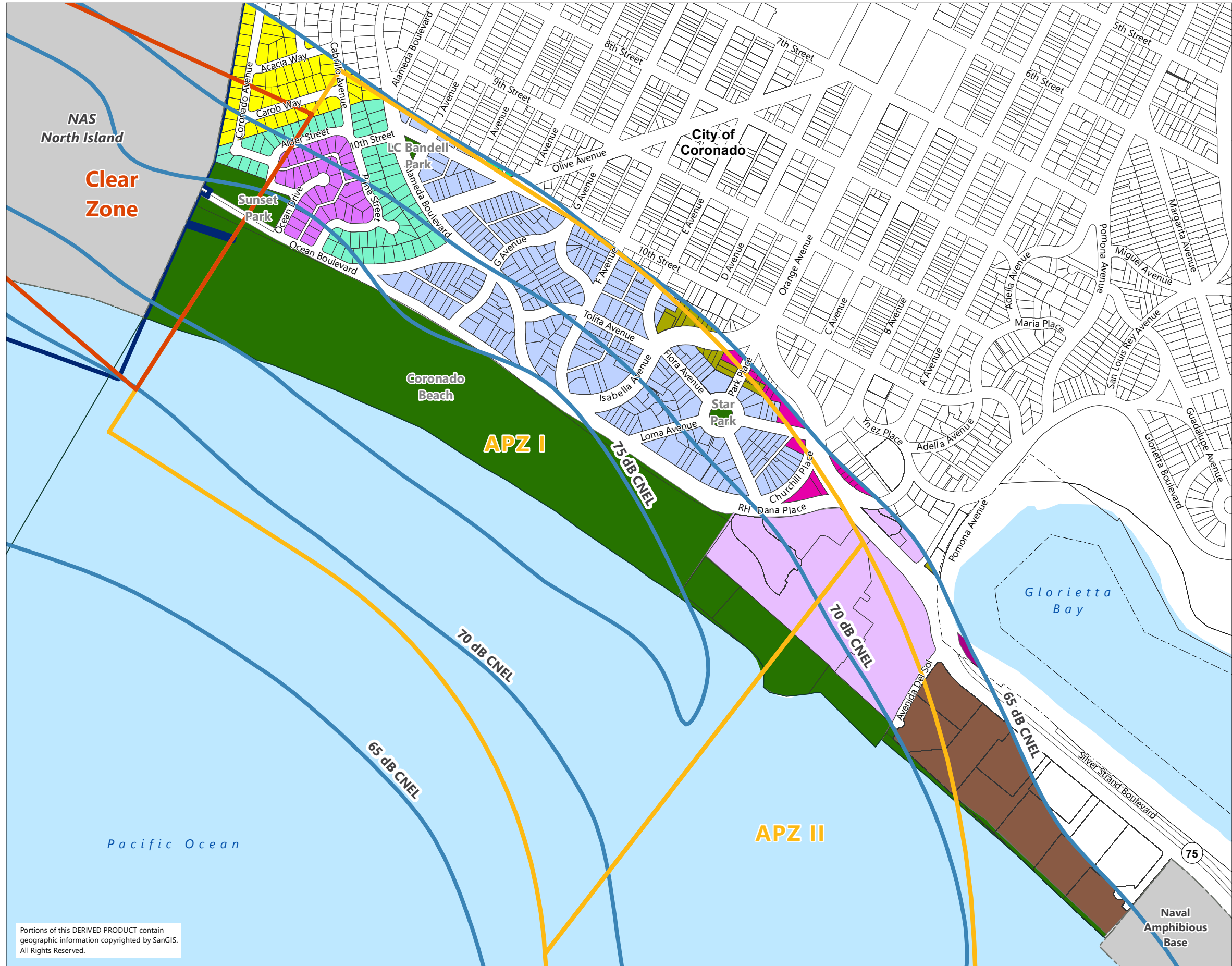
TABLE 4-4 INCONSISTENCIES OF CORONADO ZONING CODE WITH PROPOSED ALUCP POLICIES AND STANDARDS

| CORONADO ZONING CODE | NASNI ALUCP | AFFECTED ZONING DISTRICTS |
|---|--|--|
| Residential-zoned lots may be subdivided if they meet the minimum lot size requirement | The creation of new residential lots would be incompatible in the safety zones | R-1A – Single-Family Residential |
| Multiple-family housing can be developed to the maximum density allowed in the zoning district | In the safety zones, multiple-family housing is limited to the density existing at the time of ALUCP adoption, regardless of zoning district allowance | R-3 – Multiple Family Residential |
| Nonresidential development may be expanded to the maximum floor area ratio (FAR) or other maximum limit established by zoning | In the safety zones, expansion of nonresidential gross floor area (GFA) is limited to the GFA existing at time of ALUCP adoption | C – Commercial, H-M – Hotel-Motel |
| Land uses permitted in zoning districts, either by right or by special use permit, are as specified in Zoning Code | In the safety zones, the development of new risk-sensitive land uses would be incompatible | R-1A – Single-Family Residential, R-3 – Multiple Family Residential, C – Commercial, H-M – Hotel-Motel, OS – Open Space ¹ |

NOTES:

1 In all of these zones, various nonresidential risk-sensitive land uses are permitted. These land uses include schools, child day care centers, places of religious assembly, other places of public/fraternal assembly, and, in the OS zone only, campgrounds. Zoning would allow existing buildings to be adapted for these nonresidential risk-sensitive uses.

SOURCES: Coronado Municipal Code, Title 86, Zoning; SDCRAA, Airport Land Use Commission, proposed NASNI ALUCP policies and standards.



LEGEND

- Naval Air Station Property Boundary
- Federal Lands
- San Diego Unified Port District
- Municipal Boundaries
- Water
- Clear Zone Boundary
- Accident Potential Zone (APZ) I & II Boundaries
- Prospective Noise Contours

Existing Zoning and Minimum Residential Lot Size or Maximum Density

- R-1A(CC-1) - Single Family Residential (7,500 sq ft)
- R-1A(CC-2) - Single Family Residential (6,600 sq ft)
- R-1A(CC-3) - Single Family Residential (6,000 sq ft)
- R-1A - Single Family Residential (5,500 sq ft)
- R-1A(E) - Single Family Residential (5,250 sq ft)
- R-1B - Single Family Residential (3,500 sq ft)
- R-3 - Multifamily Residential (28 du/ac)
- R-5 - Multifamily Residential (47 du/ac)
- C - Commercial
- CR - Commercial Recreation
- HM - Hotel & Motel
- OS - Open Space
- MZ - Military Zone



Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours), Figure 5-3 on page 5-7 (safety zones); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pageId=1619276>, accessed June 28, 2019, (zoning).

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**Exhibit 4-2
Existing Zoning and ALUCP
Noise and Safety Zones
in Coronado**

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4.2.2.3 ORANGE AVENUE CORRIDOR SPECIFIC PLAN

California law authorizes local governments to prepare specific plans for all or part of the area covered by the general plan. A specific plan must be consistent with the general plan, but it provides considerably more detail related to the type and distribution of land uses, the layout of development, the placement and design of public facilities, and a program of implementation measures.

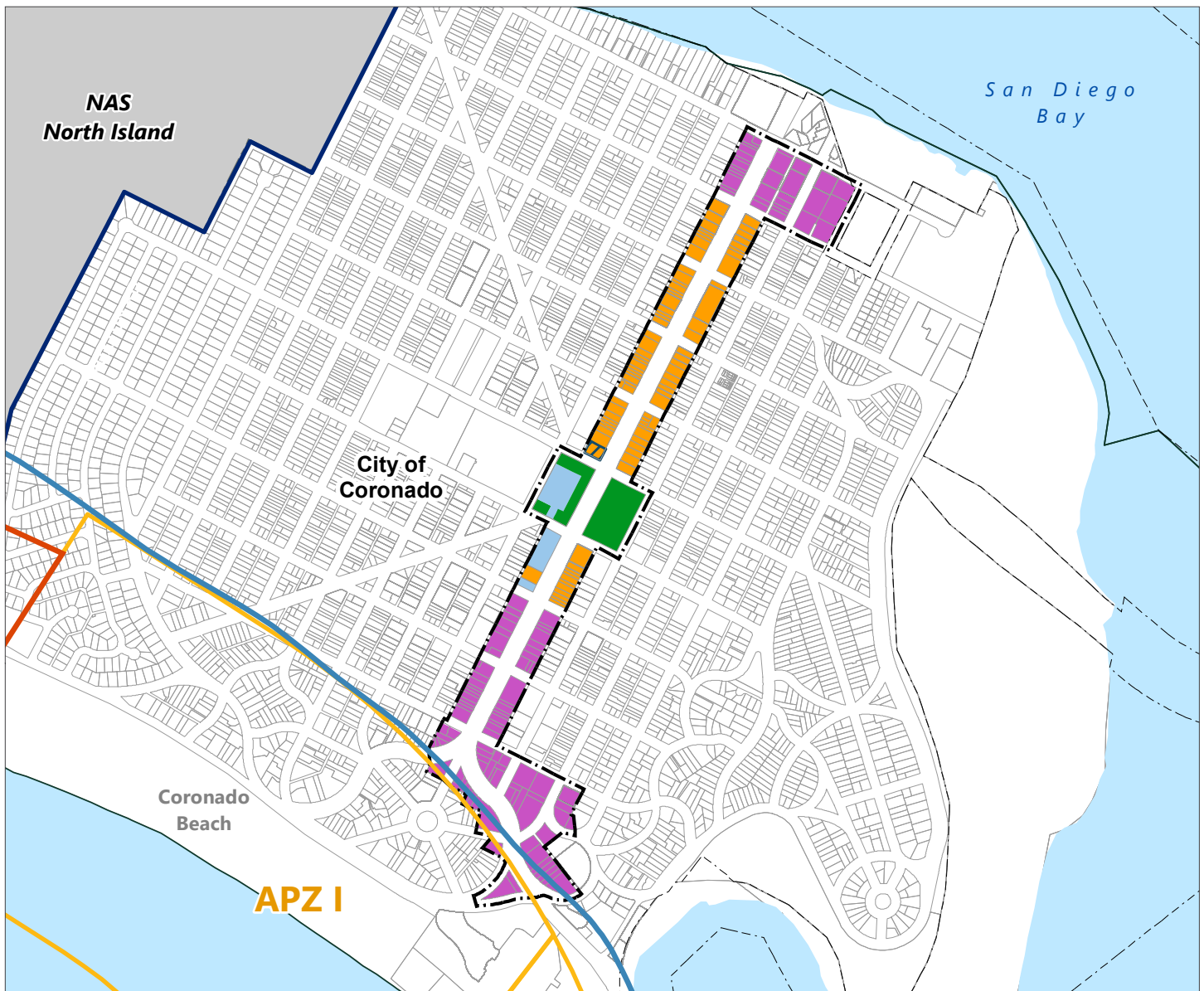
One specific plan applies in the Coronado portion of the study area – the Orange Avenue Corridor Specific Plan (OACSP), adopted in November 2003 and most recently amended in April 2014. The corridor extends along Orange Avenue from First Street on the north to R.H. Dana Place and Adella Avenue on the south. The OACSP designates commercial uses on the northern and southern ends, with residential, civic, and open space uses in the central portion of the corridor. Only a small portion of the OACSP area lies in the study area, from Loma Avenue southeast to R.H. Dana Place, as depicted on **Exhibit 4-3**. All parts of the C – Commercial zone within the Area of Potential Impact are subject to the regulations and standards of the OACSP.

4.2.2.4 CITY OF CORONADO HISTORIC RESOURCES CODE

The Coronado Historic Resources Code is intended to:⁴⁵

- Safeguard the heritage of the City and enhance its visual character by providing for the preservation of historic resources representing significant elements of its history;
- Encourage public knowledge, understanding and appreciation of the City's past as reflected in such historic resources;
- Foster civic and neighborhood pride in the beauty and noble accomplishments of its past;
- Preserve and enhance the City's historical attractions to residents, tourists, and visitors and serve as a support and stimulus to business and industry;
- Preserve diverse and harmonious architectural styles and design preferences reflecting phases of the City's history;
- Enhance property values and increase economic and financial benefits to the City and its residents and property owners through an active historic recognition and benefits program;
- Identify as early as possible and resolve conflicts between the preservation of cultural resources and alternative land uses; and
- Enable owners and lessees of such resources to apply for all financing, tax, land use, and code application benefits permitted by law for such designated historic resources.

⁴⁵ City of Coronado, Coronado Municipal Code, Chapter 84.10.010, Historic Resource Code.



LEGEND

- | | |
|---|--|
| Naval Air Station Property Boundary | Zoning Designations |
| Federal Lands | Commercial |
| San Diego Unified Port District | Civic Use |
| Municipal Boundaries | Civic Use Overlay |
| Specific Plan Boundary | Open Space |
| Water | R-4 Multifamily Residential (40 du/acre) |
| Clear Zone Boundary | |
| Accident Potential Zone (APZ) I & II Boundaries | |
| 65 dB CNEL Contour | |

Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary); County Assessor, SanGIS, San Diego Local Agency Formation Commission, 2019 (municipal boundaries); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours), Figure 5-3 on page 5-7 (safety zones); City of Coronado, *Orange Avenue Corridor Specific Plan*, Figure III-1, page 30, 2014 (zoning).

Prepared by: Ricondo & Associates, Inc., October 2019.

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

AIRPORT LAND USE COMMISSION

↑ north

0 1,250 ft.

Exhibit 4-3
Orange Avenue Corridor
Specific Plan Area

Section 84.10.090, Historic Resource Preservation Benefits, of the Coronado Municipal Code provides the regulatory directive for preservation of locally designated historic resources and eligible land use allowances for such properties. The objective of the code is to provide owners of historic properties with flexibility in the use and adaptive reuse of properties to encourage their preservation. Historic resource preservation benefits include:⁴⁶

- In any Residential Zone, a historic resource may be used as a residential use, a combined residential and commercial use, solely as a commercial use, or any other use permitted by the City Council through a major special use permit.
- An owner of a historic resource in a Residential Zone is eligible to apply for a historic resource alteration permit for a density bonus, an increase in the number of dwelling units that would normally be permitted in the underlying zone. A density bonus can only be approved by the City Council, subject to public notice and hearing procedures described in Section 84.20.090 of the Coronado Municipal Code.

Given the allowances made to the owners of locally designated historic resources, it is conceivable that historic resources could potentially be converted to accommodate land uses designated by the ALUCP as incompatible in the safety zones such as hotels, day care centers, places of worship and other places of public/fraternal assembly, or other uses (such as nursing or rest homes or hospices).

4.2.2.5 PORT MASTER PLAN

The San Diego Unified Port District (Port District) encompasses 5,483 acres of San Diego Bay tidelands.⁴⁷ The policies and regulations guiding development of the Port District lands are established in the Port Master Plan (PMP). Land within the Port District consists of commercial, industrial, recreation, conservation, public facilities, and military uses. The PMP divides the tidelands into ten smaller planning districts where precise plans provide land use regulations and standards tailored to achieve specific development outcomes in each planning district.⁴⁸

Two planning districts, Planning District 1, Shelter Island, and Planning District 6, Coronado Bayfront, are intersected by the 65 dB CNEL contour. Planned land uses for the Shelter Island Precise Plan are depicted on **Exhibit 4-4** and those for the Coronado Bayfront Precise Plan on **Exhibit 4-5** along with the 65 dB CNEL contour. Planned land uses within the 65 dB CNEL contour, as depicted on the exhibits, include commercial recreation, parks, open space, and recreational boat berthing. These land uses are all compatible with the proposed ALUCP.

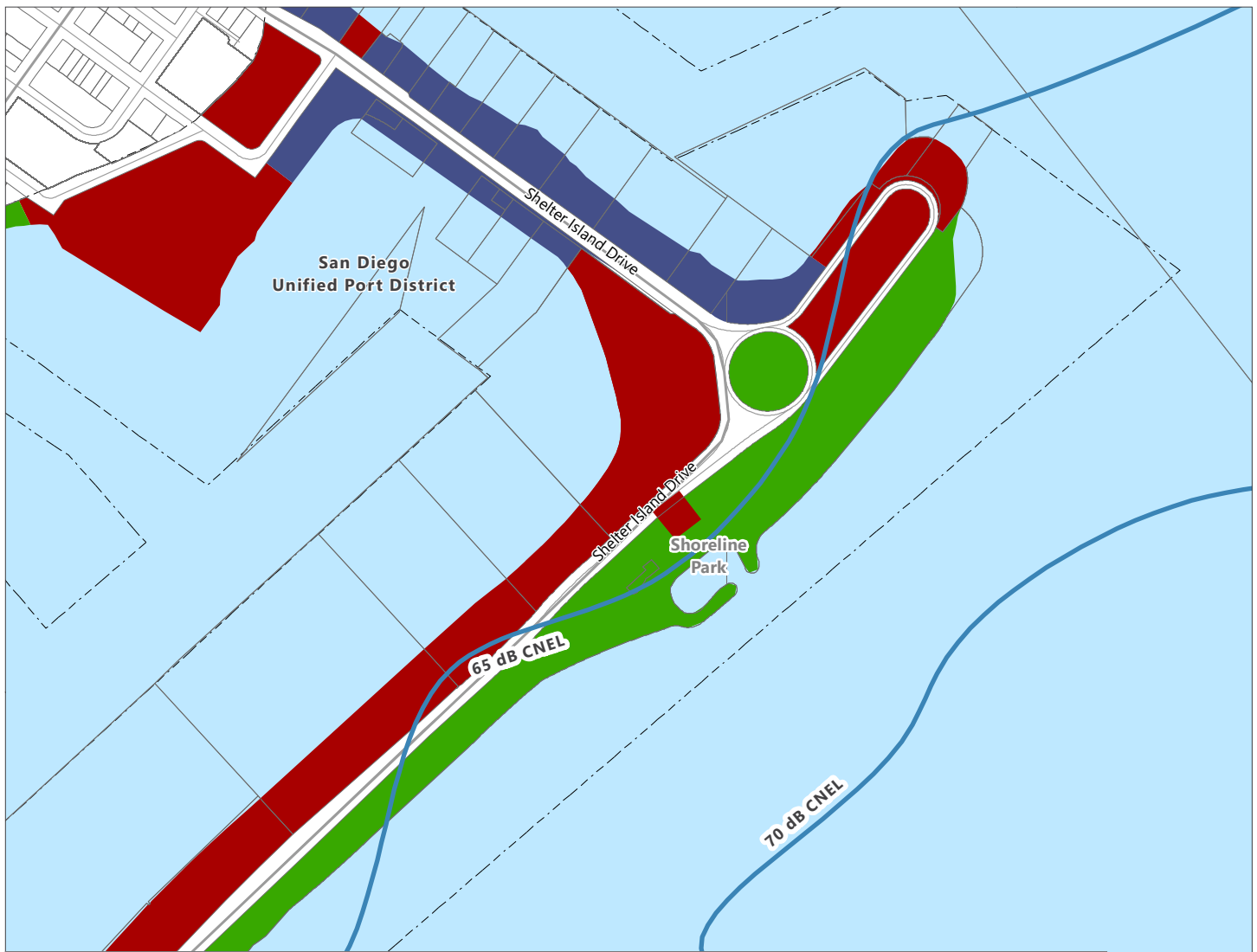
The Port District is currently in the process of updating its PMP. The Port District is monitoring the preparation of the ALUCP to appropriately reflect it in the updated PMP.⁴⁹

⁴⁶ City of Coronado, Coronado Municipal Code, Chapter 84.10.090, Historic Resource Code.

⁴⁷ Port of San Diego, *Port Master Plan, San Diego Unified Port District*, 2017, including all amendments through 2016, p. 4.

⁴⁸ Port of San Diego, *Port Master Plan, San Diego Unified Port District*, 2017, including all amendments through 2016, p. 41.

⁴⁹ Lesley Nishihira, Director of Planning, Port of San Diego, letter to Ralph Redman, San Diego County Regional Airport Authority, May 22, 2019.



LEGEND

- Major Roads
- Highways
- ▭ Parcel Boundary
- ▭ Naval Air Station Property Boundary
- ▭ Federal Lands
- - - San Diego Unified Port District
- CNEL Noise Contours
- Water
- Planned Land Use Classifications
- Commercial Recreation
- Marine Sales/Services
- Open Space

Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary), Figure 4 on page 47 (planned land use); SanGIS, County Recorder and Assessor's Office, 2019 (parcels); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours).

Prepared by: Ricondo & Associates, Inc., October 2019.

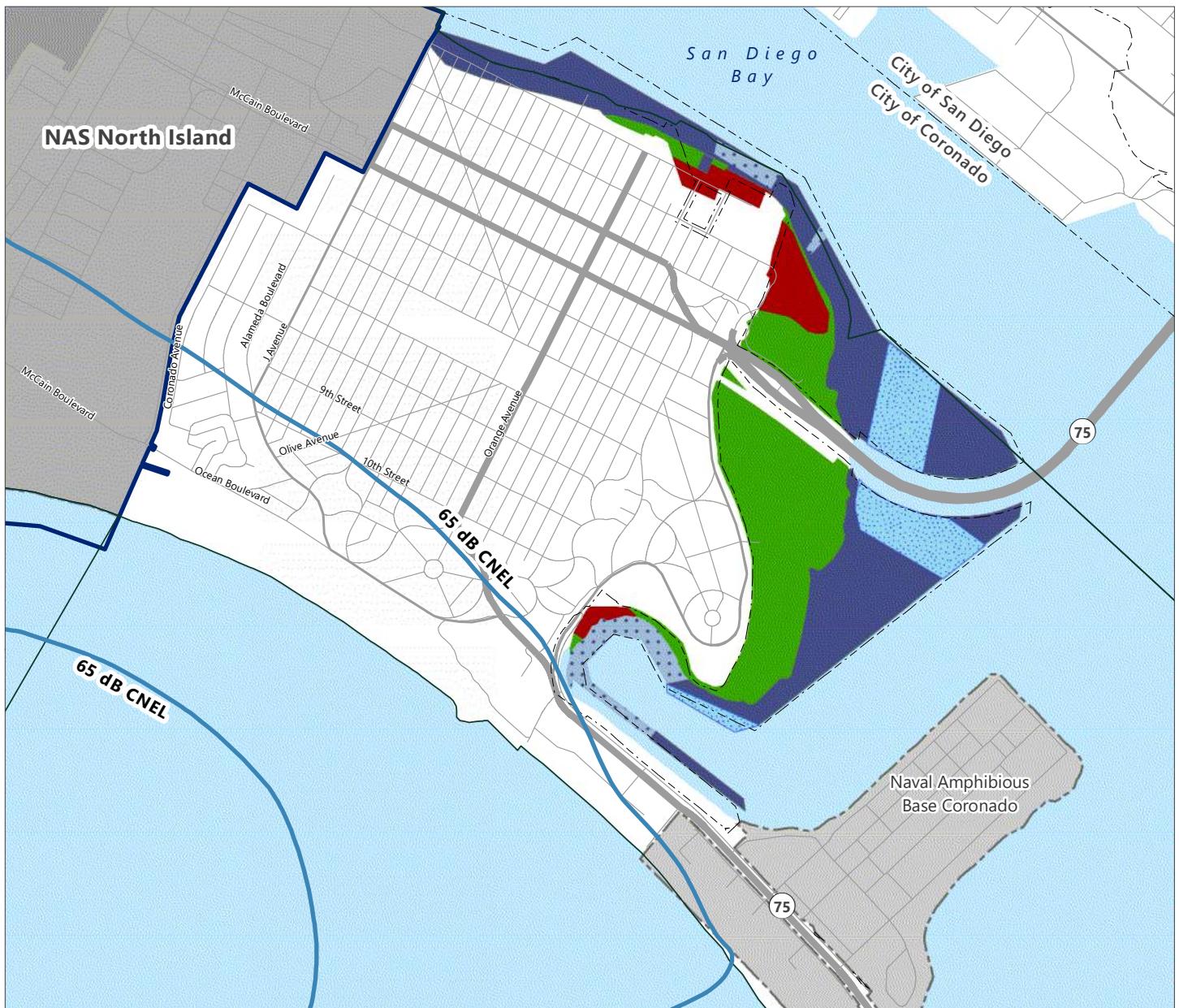
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COMMISSION



Exhibit 4-4

**Planned Land Use and ALUCP
Noise Contours on Shelter Island**



LEGEND

- | | |
|-------------------------------------|---|
| CNEL Noise Contours | <u>Planned Land Use Classifications</u> |
| Municipal Boundaries | Boat Anchorage |
| Naval Air Station Property Boundary | Commercial Recreation |
| San Diego Unified Port District | Open Bay |
| Highways | Park |
| Major Roads | Recreational Boat Berthing |
| | Federal Lands |
| | Water |

Sources: SanGIS, County of San Diego, 2019 (roads); California Department of Water Resources, 2019 (federal lands); Unified Port of San Diego, 2015 (port district boundary), Figure 17 on page 89 (planned land use); SanGIS, County Recorder and Assessor's Office, 2019 (parcels); SanGIS, County of San Diego, 2015 (hydrology); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 2-2 on page 2-3 (airport property line), Figure 3-1 on page 3-2 (airfield and runways), Figure 4-8 on page 4-12 (prospective noise contours).

Prepared by: Ricondo & Associates, Inc., October 2019.

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**Exhibit 4-5
Planned Land Use and ALUCP
Noise Contours -- Coronado
Bayfront Precise Plan**

4.2.3 THRESHOLDS OF SIGNIFICANT ENVIRONMENTAL IMPACT

Under CEQA Guidelines, Appendix G,⁵⁰ a project would result in potentially significant impacts relative to land use and planning if the project would:

- a. Physically divide an established community; or
- b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The proposed ALUCP does not entail any new development, construction, or changes to existing land uses or the environment. Therefore, the proposed ALUCP would not directly or indirectly result in the physical division of an established community. Consequently, the proposed ALUCP does not conflict with threshold (a).

With respect to threshold (b), the proposed ALUCP is unlikely to conflict with any land use plans "adopted for the purpose of avoiding or mitigating an environmental effect." Implementation of the proposed ALUCP would result in greater limits on the density and intensity of development than in the current Coronado Zoning Code. Those additional limits may result in alterations to the development patterns envisioned in the Land Use Element of the General Plan. The following section discusses the potential effects of ALUCP implementation on future development and redevelopment within the Area of Impact (the area within the safety zones and 65 dB CNEL contour).

Before discussing the project-specific impacts of the ALUCP, the role that ALUCPs play in the regional land use planning and regulatory structure should be considered. In California, ALUCPs serve as regional land use plans focused on airport land use compatibility. Because the ALUC does not have land use authority to fully implement the ALUCP, the responsibility for implementing the ALUC land use policies rests with the local agencies with jurisdiction in the AIA. Local agencies have options with regard to implementation of the ALUCP policies and standards. Specifically, the local agencies are required by state law to amend their land use plans and regulations to be consistent with the ALUCP or to overrule all or part of the ALUCP in accordance with specific requirements.⁵¹ Thus, the statute establishing the ALUCP process anticipates the potential for ALUCPs to conflict with local plans and regulations and provides local agencies with remedies for resolving the conflicts. Such actions are specifically the responsibility, and within the jurisdiction, of the local agencies and not the ALUC.

4.2.4 PROJECT-SPECIFIC IMPACTS

Implementation of the policies and standards of the proposed ALUCP would limit future development within the ALUCP Area of Potential Impact (the area within the safety zones and 65 dB CNEL contour) in three ways:

1. By limiting increases in the density (dwelling units per acre) of residential development;⁵²
2. By limiting increases in the intensity of nonresidential development, in terms of gross floor area; and
3. By designating the development of certain new land uses as incompatible.

This section analyzes how implementation of those ALUCP policies could change the potential future development pattern in the Area of Potential Impact compared with current land use plans and regulations. Specifically, it

⁵⁰ Association of Environmental Professionals, *2019 California Environmental Quality Act (CEQA) Statute and Guidelines*, Appendix G, Environmental Checklist Form, p. 321.

⁵¹ California Public Utilities Code §§ 21676(a) and 21676.5.

⁵² With the proposed ALUCP, accessory dwelling units, as provided by state law, could continue to be built if they are treated to achieve interior noise levels of 45 dB CNEL.

considers the potential displacement of development that could otherwise be built if the proposed ALUCP was not implemented.

Based on the analysis in the Initial Study, potential impacts on land use and planning would be confined to the City of Coronado.⁵³ The policies and standards of the proposed ALUCP are limited in their effects and target an area of approximately 14 percent of the nonfederal land in the City of Coronado. However, implementation of the proposed ALUCP, which would require amendments to the City's zoning regulations, would potentially result in land use impacts. This analysis focuses on the potential impacts of the proposed ALUCP on residential development, non-residential development, and development of incompatible nonresidential land uses. The discussion of potential impacts is organized by Coronado zoning district.

Before discussing specific land use impacts, it is appropriate to consider the effects of the sound attenuation standards of the proposed ALUCP.⁵⁴ Implementation of the sound attenuation standards would not limit the development of any future land uses. Those standards would only require that sound attenuation measures be incorporated into new noise-sensitive land uses. The target interior sound level (45 dB CNEL in residences and sleeping areas and 50 dB CNEL for certain office and public gathering spaces) can be achieved in the noise contours with sound attenuation measures that reduce outdoor noise levels heard inside the structure by 20 to just over 30 dB. This level of noise reduction can be achieved through the use of acoustical windows and doors, baffling of vents to the outdoors, careful weather-stripping and caulking, energy-conserving insulation, and, for higher noise level reduction levels, an additional layer of sheet rock in ceiling and wall assemblies. As stated in a U.S. Navy residential sound insulation guidance document, "The cost to build a sound insulated home is only slightly higher than the cost to build a standard home. Some design considerations may have no cost associated with them, such as locating bedrooms away from the flight pattern."⁵⁵

4.2.4.1 R-1A – SINGLE-FAMILY RESIDENTIAL ZONE

Limits on New Residential Development

The proposed ALUCP considers the development of new homes on legal lots of record within the safety zones compatible. The proposed ALUCP, however, would consider the subdivision of existing lots to create new developable lots incompatible because development on the new lots would result in an increase in residential density.⁵⁶ This limitation would apply to 19 lots in APZ I that are at least twice the minimum lot size required in the zoning district (5,500 square feet). These lots could accommodate up to an additional 28 homes if they could be subdivided. For this to be possible, however, the large homes on the affected lots may have to be demolished for the split lots to be configured to accommodate new homes.⁵⁷ Given the high value of the real estate in the area, this may be a future possibility. On the other hand, the existing homes are quite substantial and expensive and may

⁵³ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, pp. 4-18 – 4-32.

⁵⁴ See Table 2-2, Noise and Safety Compatibility Standards, in Section 2 of this EIR.

⁵⁵ Wyle Laboratories, *Guidelines for Sound Insulation of Residences Exposed to Aircraft Operations*, prepared for the Department of the Navy, Naval Facilities Engineering Command, Washington, DC. 2005, p.5-4. See Section 4.0 of this publication for guidance on noise level reduction for new homes.

⁵⁶ Accessory dwelling units, as defined by state law, are compatible with the noise and safety policies and would not be subject to this limitation, as long as any required noise level reduction standards are met.

⁵⁷ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Exhibit A-3.

continue to be highly valued by the market as they are.⁵⁸ Thus, the potential redevelopment of the properties (without implementation of the ALUCP) can only be considered speculative. Nevertheless, these 28 homes would be considered potentially displaced with implementation of the proposed ALUCP.

Table 4-5 presents the results of the single-family housing displacement analysis. The affected lots are depicted on **Exhibit 4-6**.

TABLE 4-5 POTENTIAL DISPLACEMENT OF SINGLE-FAMILY HOUSING WITHIN SAFETY ZONES

| MAP ID ¹ | ASSESSOR'S PARCEL NUMBER | PARCEL AREA (SQ FT) ² | POTENTIAL ADDITIONAL HOMES |
|---------------------|--------------------------|----------------------------------|----------------------------|
| 1 | 537-411-09 | 13,107 | 1 |
| 2 | 537-500-20 | 15,419 | 1 |
| 3 | 537-500-16 | 11,012 | 1 |
| 4 | 537-510-10 | 15,400 | 1 |
| 5 | 537-510-01 | 11,789 | 1 |
| 6 | 537-510-12 | 11,204 | 1 |
| 7 | 537-521-01 | 11,768 | 1 |
| 8 | 537-521-08 | 18,505 | 2 |
| 9 | 537-432-08 | 13,097 | 1 |
| 10 | 537-522-07 | 16,776 | 2 |
| 11 | 537-522-12 | 28,890 | 4 |
| 12 | 537-522-22 | 15,971 | 1 |
| 13 | 537-522-21 | 14,139 | 1 |
| 14 | 537-531-19 | 16,032 | 1 |
| 15 | 537-531-41 | 16,948 | 2 |
| 16 | 537-540-16 | 25,829 | 3 |
| 17 | 537-540-14 | 18,757 | 2 |
| 18 | 537-552-01 | 11,901 | 1 |
| 19 | 537-540-06 | 11,969 | 1 |
| Totals | | | 28 |

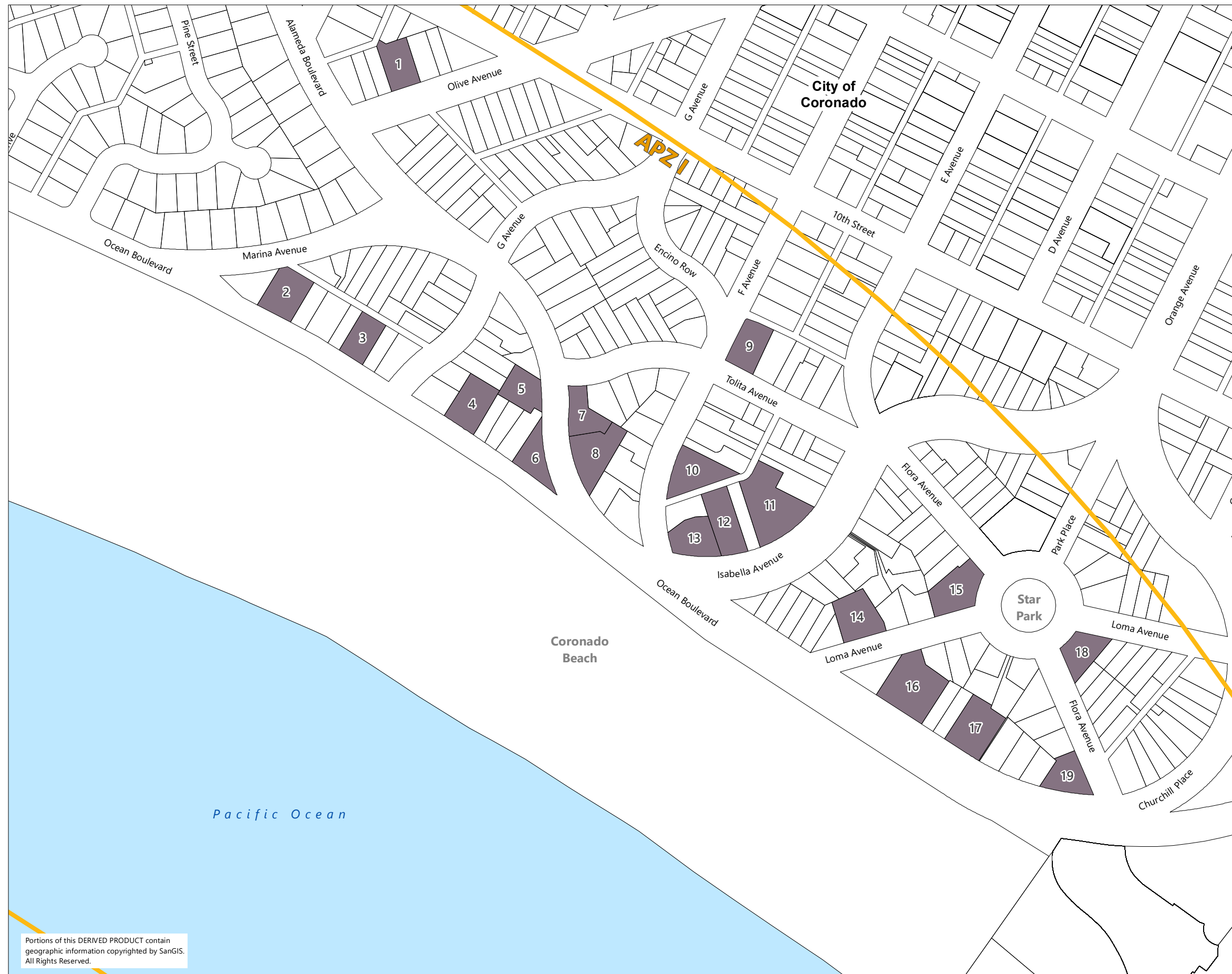
NOTES:

1 Parcels are labeled on Exhibit 4-6.

2 Includes all lots in the safety zones that are at least twice the minimum required lot size in the R-1A zone – 5,500 square feet. One single-family home is currently on each lot.

SOURCE: Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-1.

⁵⁸ In January 2019, average prices for homes in the neighborhoods within the safety zones listed on trullia.com ranged from \$25,000,000 to \$1,398,000 (https://www.trullia.com/real_estate/Coronado-California/, accessed January 30, 2019). A search of homes listed on Zillow found 18 homes in the study area listed for sale with prices ranging up to \$25,000,000. Ten of the homes were listed for more than \$3,500,000 (https://www.zillow.com/homes/for_sale/32.6926,-117.176453,32.67994,-117.196966_rect/15_zm/1_fr/, accessed January 30, 2019).



LEGEND

- Water
- Parcels of 11,000 sq ft or larger^{1/}
- Accident Potential Zone (APZ) Boundary

NOTE

^{1/} Subdivision of these parcels would be incompatible with the draft ALUCP. New accessory dwelling units, however, would be compatible on all residential-zoned parcels.



Sources: SanGIS, County of San Diego, 2015 (hydrology and parcels); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 5-3 on page 5-7 (safety zones); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pagelId=1619276>, accessed June 28, 2019, (zoning).

Prepared By: Ricondo & Associates, Inc., September 2019.

Exhibit 4-6
Single-Family Zoned Lots
Potentially Subject to Displacement
of Future Single-Family Dwellings

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Limits on the Development of New Incompatible Nonresidential Land Uses

The Coronado Zoning Code also allows the development of places of religious assembly, schools, colleges and universities, and day care centers and preschools in the R-1A zone, subject to the issuance of major special use permits.⁵⁹ Under the proposed ALUCP, these uses are considered incompatible in the safety zones because they serve vulnerable occupants.⁶⁰ Although all property zoned R-1A within the safety zones is developed, the potential exists for redevelopment of some properties for these incompatible uses. The Initial Study considered the potential for development of these uses without implementation of the ALUCP.⁶¹ As indicated in **Table 4-6**, the analysis found that with implementation of the ALUCP, up to 28 properties would become unavailable for redevelopment for child day care centers, nurseries and preschools, two for K-12 schools and places of religious assembly, and 31 for trade schools with implementation of the ALUCP. In addition, 13 properties in the R-1A zone, all of which are locally designated historic resources, would become unavailable for redevelopment for places of public/fraternal assembly.⁶²

TABLE 4-6 R-1A-ZONED PROPERTY UNAVAILABLE FOR INCOMPATIBLE USES AND POTENTIALLY SUBJECT TO DISPLACEMENT OF FUTURE DEVELOPMENT WITH IMPLEMENTATION OF THE ALUCP

| PERMITTED LAND USE | NUMBER OF PROPERTIES ¹ | LAND AREA (SQ FT) ¹ |
|--|-----------------------------------|--------------------------------|
| Child Day Care Centers, Nurseries, Preschools | 28 | 380,754 |
| K-12 Schools | 2 | 54,719 |
| Trade Schools | 31 | 402,256 |
| Places of Religious Assembly | 2 | 54,719 |
| Places of Public/Fraternal Assembly ² | 13 | 195,062 |

NOTE:

1 The number of properties and the affected land area cannot be summed because many of the same properties are included for the various land uses.

Places of public/fraternal assembly are not permitted in the R-1A zone either by right or by special use permit. The Historic Resources Code, however, allows the reuse of any locally designated historic resource for any use, regardless of zoning, subject to a major special use permit.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-2.

4.2.4.2 R-3 – MULTIPLE-FAMILY RESIDENTIAL ZONE

Limits on New Residential Development

Implementation of the ALUCP would result in making the addition of new multiple-family dwelling units beyond the number existing at the time of ALUCP adoption incompatible because it would result in an increase in residential density. This limitation would apply to four properties in the R-3 - Multiple-Family zone, which could otherwise

⁵⁹ Coronado Municipal Code, Title 86, Zoning, § 86.55.120.

⁶⁰ See Table 2-1 in Section 2 of this EIR.

⁶¹ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development.

⁶² While places of public/fraternal assembly are not permitted in the R-1A zone, any locally designated historic resources in the R-1A zone can be adapted for any land use, subject to issuance of a major use permit. Without the ALUCP, 13 local historic resources within the R-1A zone could potentially be available for reuse as places of public/fraternal assembly.

accommodate an additional eight units in total.⁶³ Those dwelling units would be considered potentially displaced with implementation of the proposed ALUCP.

Table 4-7 presents the results of the multiple-family housing displacement analysis. The affected lots are depicted on **Exhibit 4-7**.

TABLE 4-7 POTENTIAL DISPLACEMENT OF MULTIPLE-FAMILY DWELLING UNITS

| MAP ID ¹ | ASSESSOR'S PARCEL NUMBER | PARCEL SIZE (ACRES) | EXISTING LAND USE | EXISTING DWELLING UNITS (DUs) | MAXIMUM BUILDOUT POTENTIAL (DUs) ² | MAXIMUM ADDITIONAL (DUs) |
|---------------------|--------------------------|---------------------|-------------------------|-------------------------------|---|--------------------------|
| 20 | 537-440-08 | 0.28 | Residential | 6 | 7 | 1 |
| 21 | 537-440-35 | 0.20 | Residential | 3 | 5 | 2 |
| 22 | 537-440-34 | 0.17 | Residential | 5 | 4 | 0 |
| 23 | 537-532-20 | 0.04 | Residential | 1 | 1 | 0 |
| 24 | 537-532-19 | 0.06 | Residential | 1 | 1 | 0 |
| 25 | 537-532-18 | 0.08 | Residential | 2 | 2 | 0 |
| 26 | 537-532-17 | 0.12 | Commercial ³ | 0 | 3 | 3 |
| 27 | 537-532-11 | 0.14 | Residential | 3 | 3 | 0 |
| 28 | 537-532-10 | 0.12 | Residential | 1 | 3 | 2 |
| 29 | 537-551-06 | 0.14 | Residential | 3 | 3 | 0 |
| Totals | | 1.35 | | 25 | 32 | 8 |

NOTES:

1 Parcels are labeled on Exhibit 4-7.

2 Based on a maximum density of 28 units per acre. Note that Parcel 3 has one more unit than is allowed under current Coronado zoning.

3 Real estate office and laundry.

SOURCE: Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-2.

Limits on the Development of New Incompatible Nonresidential Land Uses

The Coronado Zoning Code allows the development of the same incompatible uses in the R-3 zone as in the R-1A zone (places of religious assembly; schools; colleges and universities; and child day care centers, nurseries, and preschools), subject again to the issuance of major special use permits.⁶⁴ Two properties (totaling 20,853 square feet) would become unavailable for the development of incompatible nonresidential uses in the safety zones with implementation of the ALUCP, as indicated in **Table 4-8**.⁶⁵ Only child day centers, nurseries, preschools and trade schools would be affected by the proposed ALUCP as the parcels are too small to accommodate the other incompatible nonresidential uses.

⁶³ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-2.

⁶⁴ Coronado Municipal Code, Title 86, Zoning, § 86.55.120.

⁶⁵ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-7.

LEGEND

- Parcels developed to maximum density
- Parcels with additional development capacity
- Accident Potential Zone (APZ) Boundary
- R-3 Multiple Family Zoning Boundary



Sources: SanGIS, County of San Diego, 2015 (hydrology and parcels); The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 5-3 on page 5-7 (safety zones); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pageId=1619276>, accessed June 28, 2019, (zoning).

Prepared By: Ricondo & Associates, Inc., September 2019.

Exhibit 4-7
R-3 Zoned Property
Subject to Potential Displacement
of Multiple-Family Development

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TABLE 4-8 R-3-ZONED PROPERTY UNAVAILABLE FOR INCOMPATIBLE USES AND POTENTIALLY SUBJECT TO DISPLACEMENT OF FUTURE DEVELOPMENT WITH IMPLEMENTATION OF THE ALUCP

| PERMITTED LAND USE | NUMBER OF PROPERTIES ¹ | LAND AREA (SQ FT) ¹ |
|---|-----------------------------------|--------------------------------|
| Child Day Care Centers, Nurseries, Preschools | 2 | 20,853 |
| Trade Schools | 2 | 20,853 |

1 The number of properties and the affected land area cannot be summed because many of the same properties are included for the various land uses.
 SOURCE: Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-7.

4.2.4.3 C – COMMERCIAL ZONE

Limits on the Expansion of Nonresidential Land Uses

The ALUCP would render the enlargement of existing nonresidential uses incompatible in the safety zones because it would result in an increase in nonresidential intensity. The only C – Commercial-zoned area within the safety zones covers approximately one acre at the northern edge of APZ I, as indicated on **Exhibits 4-2 and 4-8**. Two commercially zoned properties could potentially be affected by this ALUCP policy. The properties are currently occupied by a mix of retail, office, and personal and professional service uses with a total of 15,250 square feet of gross floor area. They have a potential capacity of 19,100 to 40,800 square feet, based on Coronado’s development standards set forth in the OACSP.⁶⁶ The potential for increases in floor area is limited by the City’s off-street parking requirements and the maximum height limit of 32 feet (two stories). Thus, the potential amount of nonresidential gross floor area that could be displaced with the ALUCP would range from 3,850 to 25,550 square feet.⁶⁷

Table 4-9 presents the results of the nonresidential displacement analysis for the C – Commercial zone. The affected lots are depicted on Exhibit 4-8. A third parcel in the safety zone, Coronado Plaza, is also included in Table 4-9. It is developed to its maximum practical intensity, so it would not be subject to the potential displacement of additional commercial floor area.

TABLE 4-9 POTENTIAL DISPLACEMENT OF COMMERCIAL FLOOR AREA

| ASSESSOR’S PARCEL NUMBER | EXISTING USE | PARCEL SIZE (SQ FT) | EXISTING GROSS FLOOR AREA (SQ FT) | POTENTIAL GROSS FLOOR AREA (SQ FT) | POTENTIAL DISPLACED GROSS FLOOR AREA (SQ FT) |
|--------------------------|-----------------------------|---------------------|-----------------------------------|------------------------------------|--|
| 537-532-21 ¹ | Personal services, offices | 12,039 | 7,900 | 10,100 to 21,700 ² | 2,200 to 13,800 |
| 537-552-22 | Restaurants, retail, office | 10,566 | 7,350 | 9,000 to 19,100 ² | 1,650 to 11,750 |
| 537-562-01 & -02 | Coronado Plaza | 26,479 | 45,600 | 45,600 | 0 |
| Totals | | 49,084 | 60,850 | 64,700 to 86,400 | 3,850 to 25,550 |

NOTE:

- 1 Forty-seven percent of the area of this parcel is within APZ I. It is possible that a new building could be sited on this property so that less than 50 percent of the building area is within APZ I, so that the proposed ALUCP standards would not apply to the proposed development. Because of the small size and unusual configuration of the property, however, it is also possible that a new building would have to be sited so that more than 50 percent of the area is within APZ I. In that case, the proposed ALUCP standards would apply to the proposed development. For this reason, this property is considered potentially subject to development displacement with the proposed ALUCP.
- 2 The lower numbers involve development with surface parking, the higher numbers, underground parking.

SOURCE: Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-3.

⁶⁶ The low end of the range would apply to development with surface parking, the high end to development with underground parking.
⁶⁷ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-7.

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LEGEND

- Commercial-zoned parcels with 50% or more of parcel area within safety zones
- Commercial-zoned parcel with 47% of parcel area within safety zones also analyzed to determine potential displacement
- Accident Potential Zone (APZ) I Boundary
- Commercial Zoning Boundary
- Existing Floor Area
- Potential Floor Area
- 000-000-00 Assessor's Parcel Number



Sources: SanGIS, County of San Diego, 2015 (parcels); The Onyx Group, *Air Installation Compatible Use Zone (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 5-3 on page 5-7 (safety zones); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pagelId=1619276>, accessed June 28, 2019, (zoning).

Prepared By: Ricondo & Associates, Inc., September 2019.

Exhibit 4-8
Commercial-Zoned Property
Subject to Limitations on
Nonresidential Expansion

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Limits on the Development of New Incompatible Nonresidential Land Uses

In the C – Commercial zone, the Coronado Zoning Code allows the development of several uses considered incompatible in the safety zones under the ALUCP:

- Allowed by right⁶⁸
 - Schools, K-12
 - Colleges and universities
 - Trade schools
- Allowed subject to minor special use permit⁶⁹
 - Child day care centers
 - Places of religious assembly
 - Places of public/fraternal assembly (e.g., assembly halls, meeting halls, clubs, and lodges)
 - Light manufacturing, clothing and instruments
 - Hotels and motels
 - Spectator sports arenas and stadiums
 - Theaters

Two commercial-zoned parcels (of 10,556 and 12,039 square feet) would become unavailable for the future development of child day care centers; trade schools; light manufacturing of clothing, textiles and precision instruments; hotels and motels; and theaters, as presented in **Table 4-10**.⁷⁰ The larger of the two parcels would also become unavailable for the development of places of public/fraternal assembly.⁷¹ Both parcels are too small to meet the minimum land area requirements for K-12 schools, colleges and universities, and places of religious assembly.⁷² Thus, these uses would not be considered potentially displaced from these properties.

Buildings on two of the three commercial-zoned parcels have floor area on upper floors that could possibly be suitable for certain incompatible nonresidential land uses.⁷³ This includes 3,280 square feet on the 10,556 square-foot parcel and 20,479 square feet in Coronado Plaza. With implementation of the proposed ALUCP, these spaces would become unavailable for all incompatible nonresidential uses. (The upper floor spaces are considered unsuitable for hotels and light manufacturing uses, even without the ALUCP, because of the specialized facility and

⁶⁸ City of Coronado, *Orange Avenue Corridor Specific Plan*, November 4, 2003, pp. 33 - 40.1.

⁶⁹ City of Coronado, *Orange Avenue Corridor Specific Plan*, November 4, 2003, pp. 33 - 40.1. A minor special use permit requires Planning Commission approval, after a public hearing. The decision to issue a minor special use permit can be appealed to the City Council (Coronado Municipal Codes, Title 86, § 86.55.040).

⁷⁰ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-7.

⁷¹ The smaller parcel (10,566 square feet) is too small to accommodate indoor places of public assembly (fraternal associations).

⁷² Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Table A-6.

⁷³ The third commercial-zoned parcel includes a building with less than 50 percent of its footprint inside the safety zone. Thus, the existing building would not be subject to the standards of the proposed ALUCP.

siting needs of these land uses, such as direct street visibility and access, loading zones, ground floor lobby areas, etc. Thus, these uses would not be considered potentially displaced from this property.)

TABLE 4-10 COMMERCIAL-ZONED PROPERTY UNAVAILABLE FOR INCOMPATIBLE USES AND POTENTIALLY SUBJECT TO DISPLACEMENT OF FUTURE DEVELOPMENT WITH IMPLEMENTATION OF THE ALUCP

| PERMITTED LAND USE | NUMBER OF PROPERTIES | LAND AREA ¹ (SQ FT) | GROSS FLOOR AREA ² (SQ FT) |
|---|----------------------|--------------------------------|---------------------------------------|
| Child Day Care Centers | 3 | 22,605 | 23,759 |
| K-12 Schools | 2 | 0 | 23,759 |
| College and University Classrooms | 2 | 0 | 23,759 |
| Trade Schools | 3 | 22,605 | 23,759 |
| Places of Religious Assembly | 2 | 0 | 23,759 |
| Places of Public/Fraternal Assembly | 3 | 12,039 | 23,759 |
| Hotel and Motel | 2 | 22,605 | 0 |
| Light Manufacturing (clothing, textiles, precision instruments) | 2 | 22,605 | 0 |
| Theaters | 3 | 22,605 | 23,759 |

NOTES:

The number of properties and the affected land area cannot be summed because the same properties are included for multiple land uses.

- 1 This land area is accounted for by two parcels – one of 10,566 square feet and the other of 12,039 square feet. The 10,566 square-foot parcel occupied by a two-story building with an estimated 3,280 square feet of leasable space on the second floor. Thus, the potential development displacement for this property is either 10,566 square feet of land area or 3,280 square feet of floor area, not both.
- 2 This includes 20,479 square feet of potentially leasable space in the upper floors of Coronado Plaza in addition to the 3,280 square feet of space on the 10,566 square foot parcel described in note 1.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-2.

In addition, 23,759 square feet of potentially leasable space in existing buildings on two parcels would become unavailable for child day care centers, K-12 schools, trade schools, colleges and universities (auxiliary classrooms), places of religious assembly, places of public/fraternal assembly, and theaters. Thus, they could potentially be displaced with implementation of the ALUCP by the City of Coronado.

4.2.4.4 H-M – HOTEL-MOTEL ZONE

Limits on the Expansion of Nonresidential Land Uses

The ALUCP would render the enlargement of existing nonresidential uses incompatible in the portion of the H-M - Hotel-Motel zone in the safety zones because it would result in an increase in nonresidential intensity. This policy would affect one land use in the H-M zone, the Hotel del Coronado resort.

The total land area of the Hotel del Coronado property is 1,224,907 square feet. The gross floor area of the buildings on the property, including development proposed in the approved Amended Master Plan, is 958,563 square feet, equating to a floor area ratio (FAR) of 0.78.⁷⁴ The Coronado Zoning Code would allow the expansion of buildings on

⁷⁴ Appendix B, *Revised Analysis of Potentially Displaced Development – Hotel del Coronado*, Table B-1. The Amended Master Plan has been approved by the California Coastal Commission and the City of Coronado.

the site to a maximum FAR of 1.8.⁷⁵ Thus, according to existing zoning, the building floor area could be allowed to expand to 2,204,832 square feet – an increase of 1,246,269 square feet over the Amended Master Plan. For development of this magnitude to be possible, it might be necessary to clear the site and sacrifice many of the open spaces on the property. Given the historic status of the Hotel del Coronado, the presence of a geologic fault zone, and the location of the property in the Coastal Zone, it is difficult to envision maximum development of the site as a realistic possibility.

At this time, the future of the Hotel del Coronado is best represented by the approved Amended Master Plan.⁷⁶ An analysis, described in Appendix B of this EIR, was undertaken to determine whether any additional development on the Hotel del Coronado property might be possible given development of the Amended Master Plan. It was found that, without implementation of the proposed ALUCP, up to 38,023 square feet of development could be possible on the property within the safety zones in addition to the development proposed in the Amended Master Plan. With the proposed ALUCP, this potential additional development would be incompatible and would be considered displaced.⁷⁷ This excludes the planned development provided for in the Hotel del Coronado Amended Master Plan, which has been approved by the California Coastal Commission and the City of Coronado.

Limits on the Development of New Incompatible Nonresidential Land Uses

The Coronado Zoning Code allows the following uses in the H-M zone that are considered incompatible in the safety zones under the ALUCP:

- Allowed by right⁷⁸
 - Places of public/fraternal assembly (e.g., assembly halls, meeting halls, clubs, and lodges)
 - Theaters
- Allowed subject to major special use permit⁷⁹
 - Amphitheaters, outdoor music shells
 - Sport and recreational enterprises, such as amusement parks, golf driving ranges, go-cart tracks, miniature golf courses
 - Dumps and landfills
 - Hospitals, nursing/convalescent homes
 - Places of religious assembly
 - Colleges and universities, trade schools, K-12 schools
 - Day care centers, nurseries, and preschools

⁷⁵ City of Coronado, Coronado Municipal Code, Title 86, Zoning, § 86.32.110. A special use permit is required for development exceeding a FAR of 1.8.

⁷⁶ KSL Resorts, *Hotel del Coronado Amended Master Plan*, June 2008.

⁷⁷ Appendix B, *Revised Analysis of Potentially Displaced Development – Hotel del Coronado*, Section B.3, Tables B-2 and B-3.

⁷⁸ Coronado Municipal Code, Title 86, Zoning, § 86.32.020.

⁷⁹ Coronado Municipal Code, Title 86, Zoning, § 86.55.130.

No properties would become unavailable for the development of these uses in the H-M-zoned areas in the safety zones with implementation of the ALUCP.⁸⁰ As noted, the only H-M-zoned property within the safety zones is the Hotel del Coronado. Given its unique character as a luxury resort and its status as a California landmark and national historic resource, it was considered unlikely and speculative that the owners would develop part of the property for any of these incompatible uses or that any of the property could be acquired by others for development of these uses.

As a resort, the Hotel del Coronado may include a variety of uses in addition to hotel rooms. Resorts often include accessory uses such as spas, hair salons and barber shops, retail shops, conference rooms, child day-care facilities, and performance centers. The ALUCP would render the development of any of the incompatible land uses listed above incompatible on the portion of the Hotel del Coronado property within the safety zones. This limitation would not apply to any of those uses that are currently on the Hotel del Coronado property or that are proposed as part of the approved Hotel del Coronado Amended Master Plan. Neither would the ALUCP apply to any temporary structures supporting accessory uses, such as tents or pavilions for outdoor gatherings or concerts.

4.2.4.5 OS – OPEN SPACE ZONE

Limits on the Development of New Incompatible Nonresidential Land Uses

Part of the OS – Open Space zone lies within the Clear Zone (CZ). This area includes the western two-thirds of Sunset Park and the western edge of Coronado Beach, as depicted on Exhibit 4-2. The proposed ALUCP considers the placement of any new above-ground structures in the CZ as incompatible because of close proximity of the CZ to Runway 29.⁸¹ Implementation of this ALUCP standard would prevent the development of park buildings and structures such as restrooms, playground equipment, and lifeguard stands in OS-zoned areas within the CZ. This ALUCP standard is not expected to result in any displacement of potential future development. Adequate space outside the CZ remains in the eastern part of Sunset Park and on Coronado Beach to accommodate any structures that the City may decide are necessary in the future. In addition, the existing playground at Sunset Park is an existing land use; therefore, the ALUCP policies would not apply to this existing land use.

One use allowed by the City in the OS – Open Space zone, campgrounds, is considered incompatible in APZ I and APZ II under the proposed ALUCP because of their accommodation of sleeping areas and potentially large concentrations of people.⁸² Campgrounds are allowed in the OS zone subject to a major special use permit. No land in the OS – Open Space zone is suitable for the development of campgrounds, so implementation of the ALUCP would have no effect on the potential displacement of this land use.⁸³

4.2.4.6 ADAPTIVE REUSE OF HISTORIC RESOURCES

As discussed in Section 4.2.2.4, the City of Coronado Historic Resources Code provides owners of locally designated historic properties with flexibility in the use and adaptive reuse of properties to encourage preservation of the historic resources.⁸⁴ In any residential zoning district, a historic resource may be used as a residential use, a combined

⁸⁰ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Appendix A, Analysis of Potentially Displaced Development, Section A-7 and Table A-7.

⁸¹ See Table 2-2, Standards for Noise and Safety Compatibility, in Section 2 of this EIR.

⁸² Coronado Municipal Code, Title 86, Zoning, § 86.55.190.

⁸³ Three city parks zoned OS – Open Space, Sunset, LC Bandell, and Star, in addition to Coronado Beach, are in the proposed ALUCP safety zones.

⁸⁴ City of Coronado, Coronado Municipal Code, Chapter 84.10.090, Historic Resource Code.

residential and commercial use, solely as a commercial use, or any other use permitted by the City Council through a major special use permit.

Limits on the Development of New Incompatible Nonresidential Land Uses

The Historic Resources Code creates the possibility that locally designated historic resources could be converted to any of the following land uses designated by the ALUCP as incompatible in the safety zones:

- Residential hotels (those with 75 percent or more of the available accommodations occupied by guests residing more than 30 days)⁸⁵
- Hotels
- Congregate care/nursing and convalescent facilities
- Schools (including trade schools), preschools, child day care centers
- Places of religious assembly
- Places of public/fraternal assembly (e.g., assembly halls, meeting halls, clubs, and lodges)⁸⁶

The Initial Study (included in this EIR as Appendix A) concluded that implementation of the ALUCP would not cause a significant impact on cultural and historical resources.⁸⁷ This was because other reuse alternatives, many of which are more realistic options than those that would become incompatible with implementation of the ALUCP, would remain possible under the ALUCP. Examples include bed and breakfast inns, professional offices, retail shops, and home occupations. Nevertheless, the ALUCP limitation on adaptive reuse of historic buildings for incompatible uses within the safety zones could have land use and planning impacts.

The Initial Study found that 23 historically designated parcels in the R-1A – Single-Family Residential zoning district would become unavailable for the adaptive reuse of incompatible land uses.⁸⁸

4.2.4.7 IMPACTS ON LAND USE AND PLANNING – SUMMARY AND CONCLUSIONS

Table 4-11 summarizes the potential displacement of incompatible development that could be caused by implementation of the ALUCP, as explained in the preceding sections.

⁸⁵ *Standard Land Use Coding Manual*, Urban Renewal Administration and Bureau of Public Roads, U.S. Department of Commerce, 1965, pp. 32-33.

⁸⁶ Several land uses considered incompatible in the safety zones by the ALUCP were excluded from this analysis. While the Historic Resource Code does not limit potential land uses, the following incompatible land uses were considered unrealistic candidates for adaptive reuse of historic structures because of the need for major reconfiguration of the buildings, thus harming historic character, or the need for off-street parking to serve the use: colleges and universities, hospitals, nursing and convalescent homes, hotels (excluding bed and breakfast establishments, which are compatible with the ALUCP), indoor entertainment assembly (including theaters), and light manufacturing.

⁸⁷ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, pp. 4-6 – 4-8.

⁸⁸ Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-2.

TABLE 4-11 SUMMARY OF POTENTIALLY DISPLACED DEVELOPMENT WITH ALUCP

| LAND USE | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) ¹ | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² |
|---|----------------|-----------------------------------|---|--|
| Single-Family Residential | 28 | – | – | – |
| Multiple-Family Residential | 8 | – | – | – |
| Commercial | – | 3,850 to 25,550 | – | – |
| Hotel/Resort | – | 38,023 ³ | – | – |
| Child Day Care Centers, Nurseries, Preschools ⁴ | – | – | 23,759 ⁵ | 424,212 |
| K-12 Schools ⁴ | – | – | 23,759 ⁵ | 54,719 |
| Trade Schools ⁴ | – | – | 23,759 ⁵ | 445,714 |
| Colleges and Universities (classrooms) ⁴ | – | – | 23,759 ⁵ | 0 |
| Places of Religious Assembly ⁴ | – | – | 23,759 ⁵ | 54,719 |
| Places of Public/Fraternal Assembly | – | – | 23,759 ⁵ | 207,101 |
| Hotels, Motels | – | – | 0 | 22,605 |
| Light Manufacturing (textiles, clothing, precision instruments) | – | – | 0 | 22,605 |
| Theaters | – | – | 23,759 ⁴ | 22,605 |
| Totals | 36 | 41,873 to 63,573 | 0 to 23,759⁶ | 0 to 445,714⁶ |

NOTES:

- 1 Includes only leasable floor area on the upper floors of two commercial buildings, one of which is on a parcel that is considered potentially developable and is also considered in the column to the right.
- 2 Includes the total parcel area subject to potential displacement, rather than estimated floor area of potentially displaced development.
- 3 This is considered the practical maximum amount of potential gross floor area displacement assuming that the Hotel del Coronado remains substantially as-is, in conformance with the 2011 Amended Master Plan. Based on current zoning, which allows a maximum FAR of 1.8, complete redevelopment of the Hotel del Coronado property could yield a gross floor area of 2,204,832 square feet, 1,246,269 square feet more than proposed in the 2011 Amended Master Plan. This maximum level of development is unlikely because of numerous site constraints, including the three-story maximum height limit in the H-M zone, the historic status of the main hotel building and other accessory buildings, the property's location in the Coastal zone, and the geologic fault on the property.
- 4 The Noise Element of the General Plan considers these uses as "normally unacceptable" in areas exposed to noise above 65 dB CNEL. All parts of Coronado within the NASNI safety zones are also within the 65 dB CNEL contour.
- 5 Includes 20,479 square feet of floor area on the upper floors of Coronado Plaza (map ID 43 on Exhibit 4-9) and 3,280 square feet of floor area on the second floor of the building at the corner of Loma and Orange Avenues (map ID 42 on Exhibit 4-9).
- 6 The data listed in these columns includes many of the same parcels, so the data cannot be validly summed. The "totals" represent the total leasable area or parcel area involved for each measure of displaced development noted in the corresponding column.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-3.

Exhibit 4-9 depicts the 36 properties within the displacement study area that would potentially be subject to the displacement of incompatible future land uses with implementation of the ALUCP.⁸⁹

- **Single-family residential-zoned lots** – 19 parcels, map ID numbers 1 through 19 on Exhibit 4-9
- **Multiple-family residential-zoned lots** – 2 parcels, map ID numbers 20 and 21
- **Historic buildings designated by the City of Coronado** – 23 parcels, map ID numbers 5, 6, 7, 9, 10, 12 through 18 (all of which are among the single-family residential-zoned lots noted above), 30, and 32 through 41
- **Commercial-zoned lots** (3 parcels – map ID numbers 42 through 44)

In determining the significance of the potential impacts of the ALUCP on land use and planning in Coronado, it is helpful to set those potential impacts in the context of the overall development pattern in the city. **Table 4-12** notes the proportion of land within the ALUCP safety zones relative to the land area in the entire city of Coronado. Approximately 180 acres, or 14.1 percent of the nonfederal land area in Coronado, are in the safety zones. The single-family zoned area within the safety zones represents 15.3 percent of all single-family zoned land in Coronado, the multiple-family zoned area 3.8 percent, the commercial-zoned area 4.0 percent, and the hotel-motel-zoned area 52.1 percent.

TABLE 4-12 LAND AREA WITHIN PROPOSED ALUCP SAFETY ZONES

| AREA OF INTEREST IN CORONADO | AREA IN CITY ¹ (ACRES) | AREA IN ALUCP SAFETY ZONES | |
|---|--------------------------------------|----------------------------|----------------------------------|
| | | ACRES | AS PERCENTAGE OF AREA IN CITY |
| City of Coronado (excluding federal land) | 1,272 | 180 | 14.1% |
| Single-family-zoned area | 414 | 64 | 15.3% |
| Multiple-family-zoned area | 123 | 5 | 3.8% |
| Commercial-zoned area | 25 | 1 | 4.0% |
| Hotel-motel-zoned area | 49 | 25 | 52.1% |

NOTE:

1 All area measurements exclude street and highway rights-of-way.

SOURCE: Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Table 4-4.

⁸⁹ While the parcel numbers range up to 44, only 36 parcels are depicted on the map. Eight multiple-family zoned parcels (numbered 22 through 29 and depicted on Exhibit 4-7) are too small to accommodate any of the incompatible nonresidential land uses that could be permitted by the Coronado Zoning Code. Those parcels are not included on Exhibit 4-9.

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- LEGEND**
- Zoning Boundary
 - Municipal Boundaries
 - Water
 - 65 dB CNEL Contour
 - Accident Potential Zone (APZ) I Boundary
 - Parcels potentially subject to displacement of incompatible nonresidential uses with ALUCP
 - Parcels subject to displacement of incompatible nonresidential uses from second and third floors
 - Parcels designated as historic resources



Sources: SanGIS, County of San Diego, 2015 (parcels); The Onyx Group, *Air Installation Compatible Use Zone (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, Figure 5-3 on page 5-7 (safety zones); City of Coronado, Community Development Department, 2004, <https://www.coronado.ca.us/cms/one.aspx?pagelid=1619276>, accessed June 28, 2019, (zoning).
Prepared By: Ricondo & Associates, Inc., November 2019.

Exhibit 4-9
Parcels Potentially Subject to Displacement of Incompatible Nonresidential Land Uses

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Scale of Impact – Residential Development

Approximately 84.7 percent of the single-family residential-zoned area and 96.2 percent of multiple-family-zoned land area in the city of Coronado is outside the ALUCP safety zones and would not be subject to ALUCP policies and standards.⁹⁰ Although most of the land in Coronado is developed, as it is in the safety zones, it is likely that opportunities for redevelopment or reuse of buildings exist in the portion of the residential-zoned areas outside the safety zones. Thus, opportunities would remain for new housing development in other parts of Coronado. Importantly, however, Coronado has no potential for expansion through annexation. Thus, without rezoning to allow higher residential densities, the city has a finite capacity for additional housing development. Thus, it must be recognized that implementation of the proposed ALUCP would reduce the total housing capacity of the city by 36 dwelling units.

In 2010, the city had 9,634 dwelling units.⁹¹ As discussed in Section 4.2.2.1, the Housing Element of the General Plan notes that the R-1A zone is expected to experience some minor redevelopment in the future but little net increase in housing units.⁹² The Housing Element projects a need for 50 additional housing units through April of 2021 (an increase of approximately 0.5 percent of the 2010 housing stock). The accounting period for the RHNA target of 50 units began in 2010. As of April 2012, 27 housing units credited toward the RHNA goal had been built, resulting in a net target of 23 units needed by 2021.⁹³ Seventeen housing opportunity sites with a practical capacity of 49 units, all in the R-4 Multiple-Family Residential zone, were identified for meeting the additional housing needs.⁹⁴ As all sites are outside the ALUCP safety zones, development on those sites would not be restricted by implementation of the proposed ALUCP.

Implementation of the ALUCP would potentially prevent a maximum of 36 housing units from being developed, which equates to 0.37 percent of the 2010 housing stock.⁹⁵ Given the speculative nature of the potential housing displacement, the small number of housing units involved in the context of the total number of housing units in the city, and the absence of any impact on designated housing opportunity sites, the effect of the ALUCP on residential development is considered less than significant.

By limiting the compatibility of development of new housing in the safety zones, implementation of the ALUCP may indirectly increase residential development pressures in other locations zoned for residential use.⁹⁶ Any potential indirect effect that may arise from such potential development is speculative and uncertain from a timing and

⁹⁰ Calculations by Ricondo & Associates, Inc., March 2018. See Table 4-4 in Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019.

⁹¹ *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 30.

⁹² *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 45.

⁹³ *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, p. 76.

⁹⁴ *City of Coronado 2013-2021 Housing Element*, adopted February 19, 2013, pp. 77-81. The housing sites inventory did not consider potentially available land in the R-3 – Multiple-Family Residential zone, although it acknowledged that opportunities existed in the R-3 zone for additional units.

⁹⁵ This includes 28 single-family units that could otherwise be developed subdivided lots and eight multiple-family units that could otherwise be developed on lots with excess development capacity based on existing Coronado zoning. See Sections 4.2.4.1 and 4.2.4.2, respectively.

⁹⁶ This potential outcome would depend on whether the City of Coronado implements the ALUCP. Based on state law, local agencies are authorized to amend their land use plans and regulations to fully implement the ALUCP or to overrule the ALUCP and leave their land use plans and regulations unchanged. They may also decide to implement parts of the ALUCP and overrule other parts [California Public Utilities Code §§ 21676(a) and 21676.5].

location standpoint and, therefore, any further analysis necessarily must occur at the specific project level when and if development is proposed.

Scale of Impact – Commercial Development

Approximately 96 percent of the commercially zoned area in Coronado is outside the safety zones.⁹⁷ Thus, ample opportunities would remain for the accommodation of any displaced commercial development in other parts of Coronado after implementation of the proposed ALUCP.

By limiting the commercial development expansion in the safety zones, implementation of the ALUCP may indirectly increase commercial development pressures in other locations zoned for commercial use.⁹⁸ Any potential indirect effect that may arise from such potential development is speculative and uncertain from a timing and location standpoint and, therefore, any further analysis necessarily must occur at the specific project level when and if development is proposed.

Scale of Impact – Hotel, Motel, Resort Development

Approximately 52 percent of the H-M-zoned land in Coronado is within the proposed ALUCP safety zones.⁹⁹ Although the proportion of H-M-zoned land within the safety zones is large, the amount of potential development that could be displaced is relatively small. All of the affected area is on Hotel del Coronado property. Based on the analysis in Appendix B, implementation of the proposed ALUCP could potentially result in the displacement of 38,023 square feet of additional development on the Hotel del Coronado property. This amounts to 3.8 percent of the total potential gross floor area of the Hotel del Coronado (996,586 square feet), a reduction in the potential FAR from 0.81 to 0.78.¹⁰⁰

An additional consideration is that the Coronado Zoning Code would allow the expansion of buildings on the Hotel del Coronado site to a maximum FAR of 1.8.¹⁰¹ Thus, according to existing zoning, the building floor area could be allowed to expand to 2,204,832 square feet – an increase of 1,246,269 square feet over the Amended Master Plan. For development of this magnitude to be possible, it might be necessary to clear the site and sacrifice many of the open spaces on the property. Given the historic status of the Hotel del Coronado, the presence of a geologic fault zone, and the location of the property in the Coastal Zone, it is difficult to envision maximum development of the site as a realistic possibility. Nonetheless, based on current zoning, the Hotel del Coronado site has additional development capacity, some of which could be tapped in the long-range future without implementation of the proposed ALUCP.

⁹⁷ Calculations by Ricondo & Associates, Inc., March 2018. See Table 4-4 in Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019.

⁹⁸ This potential outcome would depend on whether the City of Coronado implements the ALUCP. Based on state law, local agencies are authorized to amend their land use plans and regulations to fully implement the ALUCP or to overrule the ALUCP and leave their land use plans and regulations unchanged. They may also decide to implement parts of the ALUCP and overrule other parts [California Public Utilities Code §§ 21676(a) and 21676.5].

⁹⁹ Calculations by Ricondo & Associates, Inc., March 2018. See Table 4-4 in Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019.

¹⁰⁰ Appendix B, *Revised Analysis of Potentially Displaced Development – Hotel del Coronado*, Table B-3.

¹⁰¹ City of Coronado, Coronado Municipal Code, Title 86, Zoning, § 86.32.110. A special use permit is required for development exceeding a FAR of 1.8.

By limiting the compatibility of hotel/resort development expansion in the safety zones, implementation of the ALUCP may indirectly increase hotel/resort development pressures in other H-M-zoned areas.¹⁰² Any potential indirect effect that may arise from such potential development is speculative and uncertain from a timing and location standpoint and, therefore, any further analysis necessarily must occur at the specific project level when and if development is proposed.

In conclusion, given the range of potential displacement that could be caused by implementation of the proposed ALUCP and the relatively limited areas of H-M-zoned land outside the safety zones, the potential impact of the proposed ALUCP on hotel, motel, and resort development is considered significant.

Scale of Impact – Incompatible Nonresidential Development

As discussed in Section 4.2.4 and summarized in Table 4-11, a considerable amount of land – 36 parcels totaling 445,714 square feet – would become unavailable for the development of incompatible nonresidential development with implementation of the proposed ALUCP.

While the ALUCP limitation on incompatible nonresidential land uses in the safety zones conflicts with the requirements of Coronado zoning, the limitations on some of those incompatible land uses is consistent with the policies of the General Plan Noise Element. All of the incompatible uses allowed in the R-1A – Single-Family and R-3 – Multiple-Family residential zoning districts (schools and places of religious assembly) are considered by the Noise Element as “normally unacceptable” in areas exposed to noise above 60 dB CNEL.¹⁰³ These same uses are also allowed in the C – Commercial zoning district. As depicted on Exhibit 4-2, the safety zones (CZ, APZ I, and APZ II) all lie entirely within the 65 dB CNEL contour. Thus, the proposed ALUCP limitation on incompatible nonresidential uses in the safety zones would be consistent with the policy set forth in the Noise Element of the General Plan.

The Area of Potential Impact (the area within the safety zones and 65 dB CNEL contour) is fully developed with urban land uses and has no signs of disinvestment or land use change. Thus, the potential redevelopment of land in the Area of Potential Impact for incompatible nonresidential land uses, without implementation of the ALUCP, is speculative, as is the potential impact of the proposed ALUCP on limiting this development.

Most of the incompatible nonresidential uses that would be considered incompatible in the proposed ALUCP safety zones are institutional or public service uses, which are either subject to limited development demand or priced out of the local real estate market. The numbers of these uses that currently occur in Coronado are as follows:¹⁰⁴

- Child day care centers, nurseries, preschools (not including in-home facilities) – 5
- K-12 schools – 10
- Trade schools – 1
- Colleges, universities – 0
- Places of religious assembly – 10

¹⁰² This potential outcome would depend on whether the City of Coronado implements the ALUCP. Based on state law, local agencies are authorized to amend their land use plans and regulations to fully implement the ALUCP or to overrule the ALUCP and leave their land use plans and regulations unchanged. They may also decide to implement parts of the ALUCP and overrule other parts [California Public Utilities Code §§ 21676(a) and 21676.5].

¹⁰³ See Table 4-2, Noise Sensitivity of Land Use – City of Coronado Noise Element.

¹⁰⁴ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan, CEQA Initial Study*, April 2019, Appendix A, Attachment A.

■ Places of public/fraternal assembly – 5

According to the displacement analysis, three of these uses – (1) trade schools; (2) child day care centers, nurseries, and preschools; and (3) places of public/fraternal assembly – could be subject to relatively high levels of displacement, but they occur only infrequently in Coronado. Trade schools are subject to the highest amount of potential displacement (445,714 square feet of property and 23,579 square feet of existing floor area), but only one such school is currently established in Coronado. Only five examples of the other two uses with the next highest amounts of potential displacement – child day care centers, nurseries, and preschools (424,212 square feet of property and 23,579 square feet of floor area) and places of public/fraternal assembly (207,101 square feet of property and 23,579 square feet of floor area) – currently occur anywhere in Coronado. Thus, the potential impact of the proposed ALUCP on these incompatible nonresidential uses is considered less than significant.

Two of the remaining incompatible institutional uses – K-12 schools and places of religious assembly – are more numerous in Coronado but are subject to low levels of potential displacement. Ten K-12 schools and 10 places of religious assembly are currently in Coronado. These uses could be subject to displacement on 54,719 square feet of property and 23,579 square feet of floor area.

The development of three incompatible commercial/industrial land uses would be subject to potential displacement – hotels and motels; light manufacturing of textiles, clothing, and precision instruments; and theaters. Two parcels totaling 22,605 square feet would become unavailable for the development of these uses. In addition, 23,759 square feet of existing floor area would become unavailable for the development of theaters. Given the small amount of property involved and the size of areas zoned for commercial and hotel-motel use outside the safety zones where these small amounts of development could be accommodated, this impact is considered less than significant.

4.2.5 MITIGATION MEASURES

Although the proposed ALUCP would be consistent with the strategic vision of the City's General Plan, which broadly relates to the preservation of the existing character of the city, the proposed ALUCP would conflict with applicable City zoning in the Area of Potential Impact. Implementation of the proposed ALUCP would require greater restrictions on the density and intensity of development and the designation of specific land use types as incompatible within certain safety zones and noise contours. The impact of the proposed ALUCP on the City of Coronado may lead to potentially significant impacts on land use and planning, specifically related to areas zoned by the City for H-M – Hotel-Motel.

While the proposed ALUCP conflicts with the Coronado Zoning Code in some respects, the proposed ALUCP policies and standards reflect the legislative mandate to which the ALUC is subject, which requires the ALUCP to achieve consistency with the AICUZ study. They also reflect guidance provided in the Caltrans Handbook.¹⁰⁵ Thus, any mitigation involving revisions to the ALUCP to relieve those conflicts would be contrary to the project goals and objectives of the ALUCP, as stated in Section 2.2 of this EIR.

As provided in state law, the responsibility to resolve the conflicts rests with the City of Coronado. The law provides that the City can amend its land use regulations to achieve consistency with the ALUCP or overrule the ALUCP, subject to making findings that the City's current land use plans and regulations fulfill the objectives of the ALUC

¹⁰⁵ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-3 – 3-11, 3-26 – 3-36, 3-47 – 3-48, 4-1 – 4-46.

statute.¹⁰⁶ The City also has the authority to make General Plan and zoning code amendments to allow for any new development that may be displaced from within the ALUCP noise contours and safety zones. This could be achieved, for example, by increasing the allowable residential density or nonresidential development intensity in selected areas outside the ALUCP safety zones. These potential measures, however, are outside the responsibility and control of the ALUC. Thus, it is not possible for the ALUC either to implement these measures or to legally impose them.¹⁰⁷

In conclusion, no reasonable or feasible mitigation measures are available to the ALUC.

4.2.6 SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED IF PROPOSED PROJECT IS IMPLEMENTED

The potentially significant impacts discussed in Section 4.2.4 would be unavoidable if the proposed ALUCP is adopted by the ALUC and implemented by the City of Coronado. The potential impacts, which particularly relate to areas zoned H-M – Hotel-Motel, stem directly from the objectives of the proposed ALUCP, discussed in Section 2.2 of this EIR, in particular the following:

- Protect public safety by:
 - Limiting new risk-sensitive land uses within safety zones;
 - Avoiding an increase in existing land use incompatibility within the safety zones;

As discussed in Section 4.2.5, the City may be able to mitigate these impacts, but that is at the City's discretion, and the ALUC has no authority to require the City to mitigate these impacts. The ALUC lacks the ability to mitigate the impacts without revising the ALUCP in a way that would compromise achievement of the project objectives of the proposed ALUCP. No reasonable or feasible mitigation measures are available to the ALUC.

4.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

An EIR must discuss any potentially significant effects on the environment that would be irreversible if the proposed project were implemented.¹⁰⁸ Specifically, an EIR must discuss whether:

[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.¹⁰⁹

The proposed project is a land use planning document; therefore, no significant irreversible environmental changes would result from adoption and implementation of the proposed ALUCP. As discussed throughout this EIR, the proposed ALUCP would not entail any new development, construction, or changes to the existing land uses or the environment. Therefore, the proposed project would not require the commitment or use of any nonrenewable

¹⁰⁶ California Public Utilities Code §§ 21676(a) and 21676.5.

¹⁰⁷ California Code of Regulations § 15126.4(a)(5).

¹⁰⁸ California Public Resources Code, § 21100(b)(2)(B).

¹⁰⁹ California Code of Regulations, Title 14, § 15126.2(c).

resources. Accordingly, the proposed ALUCP would not result in significant irreversible environmental changes stemming from the use of nonrenewable resources or the irretrievable commitments of resources.

4.4 GROWTH-INDUCING IMPACTS

An EIR must discuss the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."¹¹⁰ Projects that may "encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively," also are considered to be growth-inducing.¹¹¹ However, an EIR is not required to make a detailed analysis of a proposed project's effects on growth. A general analysis is sufficient in light of the numerous and complex variables that determine whether and how a proposed project may induce growth. "[T]he particular growth that can be attributed to a project can be very difficult to predict, given the large number of variables at play, including uncertainty about the nature, extent and location of growth and the effect of other contributors to growth besides the project."¹¹² Notably, an EIR is not required to forecast and mitigate development described as induced growth because such issues are best left to the proponents of any resulting/subsequent development.

The proposed ALUCP does not directly facilitate growth as it does not contain any growth accommodating features (e.g., infrastructure such as roads or utilities). Further, the proposed project would not directly necessitate the construction of growth-accommodating facilities, as planning documents do not directly attract residential or nonresidential growth. That is, the proposed ALUCP is not a development project that would necessitate the construction of additional development. For example, while a residential community may facilitate the construction of commercial areas to support the residents' needs, a regulatory land use plan does not, by its nature, necessitate the construction of growth-accommodating facilities.

The proposed ALUCP may indirectly displace future land uses from certain areas within the ALUCP Area of Potential Impact, potentially setting in motion a chain of events that could potentially induce growth in areas outside of the Area of Potential Impact. There are a range of potential outcomes that could occur with implementation of the proposed ALUCP.

1. The future development potentially displaced from the Area of Potential Impact would never occur with or without implementation of the ALUCP
2. The future development potentially displaced from the Area of Potential Impact would be unavoidable – it would have occurred without implementation of the ALUCP but would not occur with implementation of the ALUCP
3. The future development potentially displaced from the Area of Potential Impact would occur outside the Area of Potential Impact in other parts of the city of Coronado
4. The future development potentially displaced from the Area of Potential Impact would occur elsewhere, scattered throughout the metro area
5. Various combinations of the four previous outcomes could occur

¹¹⁰ California Code of Regulations, Title 14, § 15162.2(d); California Public Resources Code, § 21100(b)(5).

¹¹¹ California Code of Regulations, Title 14, § 15162.2(d); California Public Resources Code, § 21100(b)(5).

¹¹² Kostka, Stephen L. and Michael H. Zischke, *Practice Under the California Environmental Quality Act* (October 2006). Oakland, CA: Continuing Education of the Bar-California, pp. 683 - 684

In short, it is not possible to predict how the real estate market and local developers would respond to potential displacement of development. Thus, while it is possible that the development displaced by implementation of the ALUCP may occur in other areas, it is impossible to predict where that development would occur or the extent of growth-inducing impact it may have. Because the development that would be displaced is allowed in other parts of the city under existing land use plans and regulations, it is anticipated that implementation of the proposed ALUCP would result in less than significant growth-inducing impacts.

4.5 CUMULATIVE IMPACTS

Based on the analysis in this EIR, the proposed ALUCP would lead to significant impacts on land use and planning, particularly with respect to areas zoned H-M – Hotel-Motel. The impacts are related to the potential displacement of future development that would be caused by implementation of the proposed ALUCP. Less than significant impacts are anticipated on all other CEQA environmental categories, as summarized in Table 4-1.

This section considers the potential for the impacts of the proposed ALUCP, in combination with the impacts of other projects, to become cumulatively significant. The City of Coronado’s website was searched for past projects and planned future projects that could combine with the impacts of the ALUCP to create cumulatively significant environment impacts.¹¹³ Planned changes at NASNI were also considered. Two recent ordinances and three current planning efforts of potential relevance were found: Ordinance 2062, adopted October 4, 2016, implementing the residential standards improvement program; Ordinance 2088, adopted December 18, 2018, amending the Historic Resources Code; regional planning for sea level rise; the planned conversion from C-2A to CMV-22B aircraft at NASNI; and the Regional Housing Needs Assessment (RHNA) update process.

4.5.1 ORDINANCE 2062 – RESIDENTIAL STANDARDS IMPROVEMENT PROGRAM

This ordinance amended the Zoning Code by adding design standards for residential development. The additional standards are intended to ensure light and air for properties adjacent to those that are undergoing development or expansion by limiting building heights and mass. The standards also adjusted residential yard and building setback requirements. Standards for burying utilities were also established for new construction and for substantial building modifications. Other standards address the placement of mechanical equipment; the design of dormers, roof decks and balconies; and the design and placement of fences, walls and hedges.¹¹⁴ These zoning amendments would not alter the effect of the proposed policies and standards of the ALUCP on potential residential development and would not lead to cumulative impacts on residential development.

4.5.2 ORDINANCE 2088 – AMENDED HISTORIC RESOURCES CODE

This ordinance amended some of the criteria for buildings to qualify as historic resources and modified administrative processes related to applying for historic resource designation. Certain editorial revisions were also made.¹¹⁵ The amendments to the Historic Resources Code would not change the relationship of the Code to the

¹¹³ City Council meeting agendas through June 4, 2019 and Planning Commission meeting agendas through May 28, 2019 were reviewed.

¹¹⁴ Ordinance No. 2062, An Ordinance of the City Council of the City of Coronado, California, Amending Portions of the Coronado Municipal Code to Implement the Recommendations of the Residential Improvement Standards Program (RSIP-3) ..., adopted October 4, 2016; Coronado Municipal Code, RSIP-3, Proposed Revisions, June 27, 2016, (Revised by City Council September 20, 2016).

¹¹⁵ Ordinance No. 2088, An Ordinance of the City Council of the City of Coronado, California, Amending Portions of Chapters 84.10 And 84.20 of the Coronado Municipal Code Related to the Historic Preservation Program, Agenda, City of Coronado City Council, December 18, 2018, pp. 95 - 111.

ALUCP, nor would the amendments interact with the proposed policies and standards of the ALUCP to create cumulative impacts.

4.5.3 REGIONAL PLANNING FOR RISING SEA LEVELS

The City of Coronado has been coordinating with other San Diego Bay area governments and stakeholders in studying the potential impact of rising sea levels on the local natural and built environment. The City of Coronado was represented on the Steering Committee and Technical Advisory Committee that participated in the preparation of an adaptation strategy document in 2012.¹¹⁶

The adaptation strategy report included a vulnerability assessment for various sectors of the natural and built environment and identified ten adaptation strategies. The adaptation strategy report also identified a series of targeted strategies for each sector of the natural and built environment for which vulnerability assessments were undertaken. With respect to building stock, the report identifies two areas in Coronado as being at risk by the year 2100 – the Coronado Cays and all housing on the east side of 1st Street.¹¹⁷ The report identifies the following seven strategies for addressing the risk of flooding and inundation of the building stock, as prioritized by the project's Stakeholder Working Group and the Technical Advisory Committee.¹¹⁸

1. In areas vulnerable to projected SLR [sea-level rise]-related flooding and in the existing 100-year floodplain, consider strengthening floodplain management regulations through participation in the FEMA [Federal Emergency Management Agency] Community Rating System or through incorporation of more flood resistant building code provisions.
2. Work with FEMA to improve Flood Insurance Rate Maps (FIRMs) and create additional maps that include future sea level rise.
3. Create financial incentives for buildings constructed to higher standards.
4. Create a real estate disclosure statement that requires more explicit statements regarding future risks.
5. Develop, enhance and distribute outreach and education materials for building owners and tenants in flood prone areas.
6. Gather more specific elevation data creating a better understanding of current base floor building elevations.
7. In areas vulnerable to projected SLR-related flooding that are not in the existing 100-year floodplain, consider applying NFIP [National Flood Insurance Program] minimum requirements to new development.

Section 5 of the adaptation strategy report includes several management practices and engineering techniques that can be used in different situations to adapt to sea level rise.

At this point, no specific regulations or development standards related to sea level rise have been adopted by the City of Coronado. Neither the comprehensive strategies nor the targeted strategies related to the building stock would interact with the proposed policies and standards of the ALUCP to create cumulative impacts.

¹¹⁶ ICLEI Local Governments for Sustainability, *Sea Level Rise Adaptation Strategy for San Diego Bay*, January 2012. Prepared for the project's Public Agency Steering Committee, with the support of The San Diego Foundation.

¹¹⁷ ICLEI Local Governments for Sustainability, *Sea Level Rise Adaptation Strategy for San Diego Bay*, January 2012, p. 47.

¹¹⁸ ICLEI Local Governments for Sustainability, *Sea Level Rise Adaptation Strategy for San Diego Bay*, January 2012, p. 48.

4.5.4 CMV-22B CONVERSION AT NASNI

The U.S. Navy is planning a conversion from C-2A Greyhound fixed-wing aircraft to CMV-22B Osprey tilt-rotor aircraft, starting in 2020 and finishing by 2028. The Environmental Assessment (EA)¹¹⁹ for the proposed project evaluated two action alternatives. Alternative 1 would increase the aircraft based at NASNI from 10 C-2As to 23 CMV-22Bs. Alternative 2 would increase the number of based CMV-22Bs to 18 aircraft.¹²⁰ The EA concluded that no significant environmental impacts would occur with either of the two alternatives.¹²¹ No changes to the AICUZ study, prepared in 2011, would be required.¹²²

The planned aircraft conversion at NASNI would not interact with the policies and standards of the ALUCP to create cumulative impacts.

4.5.5 REGIONAL HOUSING NEEDS ASSESSMENT UPDATE PROCESS

The San Diego Association of Governments (SANDAG) is in the process of updating the Regional Housing Needs Assessment (RHNA) for the 6th Housing Element Cycle (2021 – 2029). The ultimate objective of that process is to allocate the region's needed housing units for the period, as determined by the State Department of Housing and Community Development (HCD), among the local governments throughout the region. Local governments are then required to update their housing elements with the goal of achieving their RHNA allocations.

In July of 2018, HCD determined the San Diego region would need to plan for 171,685 housing units during the 6th cycle (2021-2029). SANDAG, the council of governments for the San Diego region, is responsible for developing a methodology for allocating the regional housing need among the region's 19 jurisdictions.¹²³

SANDAG began the process in December of 2018. In July of 2019, SANDAG released the draft RHNA methodology for public comment. The SANDAG Board approved the draft methodology on September 6, 2019 and submitted it to HCD for review. HCD has 60 days to review the draft methodology and provide comments to SANDAG. SANDAG anticipates adopting a final methodology late in 2019, when it will post on its website a draft allocation of the number and types of housing units for each jurisdiction. The draft allocation will be distributed to the local jurisdictions and HCD for an additional 45-day review. SANDAG will consider any comments received on the draft allocation and adopt a final methodology and allocation. After adoption, SANDAG will incorporate the RHNA allocations into its 2021 regional transportation plan. Local governments will update their housing elements to provide for achieving the new RHNA allocations.¹²⁴ .¹²⁵

¹¹⁹ Department of Defense, Department of the Navy, *Finding of No Significant Impact for the Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers – Naval Air Station North Island, California, and Naval Station Norfolk, Virginia*, November 15, 2018.

¹²⁰ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-1.

¹²¹ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, pp. ES-5 – ES-13.

¹²² Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-6.

¹²³ SANDAG, Draft 6th Cycle Regional Housing Needs Assessment Methodology, September 6, 2019, p. 2.

¹²⁴ SANDAG, Draft 6th Cycle Regional Housing Needs Assessment Methodology, September 6, 2019, p. 2.

¹²⁵ <https://www.sandag.org/index.asp?classid=12&subclassid=116&projectid=189&fuseaction=projects.detail> Accessed November 1, 2019.

The City of Coronado submitted comments to SANDAG on the draft RHNA methodology.¹²⁶ The City noted that based on the draft RHNA methodology, it would be allocated a housing need of 1,001 dwelling units. The City expressed concerns with the practicality of that requirement. It also raised several specific concerns with the RHNA methodology, which, the City believes, results in an undue burden being assigned to Coronado.

As presented in Section 4.2.4 and summarized in Table 4-10, the implementation of the proposed ALUCP could result in the displacement of 28 single-family and 8 multiple-family housing units. While this potential impact is small relative to the total housing supply in Coronado (0.37 percent), a substantial increase in the City's RHNA allocation would increase the importance of this increment of potential housing capacity. It is difficult to envision how the City could reasonably plan for additional single-family housing development in the ALUCP Area of Potential Impact even without adoption and implementation of the ALUCP.¹²⁷ On the other hand, an increase in the multiple-family housing supply in the Area of Potential Impact, if only by 8 units, would be reasonable and possible to achieve if the proposed ALUCP is not implemented.¹²⁸

Until the final RHNA methodology and Coronado's RHNA allocation are known, the potential contribution of the ALUCP to cumulative impacts on housing development cannot be determined. Nonetheless, given the potential for a substantial increase in Coronado's RHNA allocation, it is possible that implementation of the ALUCP could interact with the updated RHNA allocation and the updated Housing Element to create cumulative impacts.

4.5.6 CUMULATIVE IMPACTS – SUMMARY

The environmental impacts of the proposed ALUCP would not interact with four of the five other projects reviewed in Section 4.5 to cause significant cumulative impacts. No cumulatively significant impacts would arise from the proposed ALUCP in combination with Coronado Ordinance 2062 (residential standards improvement program), Coronado Ordinance 2088 (amended historic resources code), regional planning for rising sea levels, or the NASNI conversion from the C-2A to the CMV-22B aircraft.

The ongoing RHNA update and the subsequent required update to the Coronado Housing Element, however, could possibly interact with the housing and residential land use impacts of the proposed ALUCP to create significant cumulative impacts. Until the RHNA process is completed, it is not possible to determine whether cumulatively significant impacts would arise. As discussed in Section 4.2.5, Mitigation Measures, the ALUC would be unable to mitigate any cumulative impacts on housing or residential land use given its statutory obligations to achieve consistency with the AICUZ study and reflect the guidance provided in the Caltrans Handbook. The City of Coronado could conceivably mitigate the cumulative impacts through zoning amendments increasing the allowable residential density in parts of the city outside the proposed ALUCP noise and safety zones. These potential measures, however, are outside the responsibility and control of the ALUC. Thus, it is not possible for the ALUC either to implement or to legally impose these measures.

¹²⁶ Richard Bailey, Mayor, City of Coronado, Re: SANDAG RHNA Methodology, letter to SANDAG Board of Directors, September 4, 2019.

¹²⁷ Reasons for the speculative nature of potential single-family housing development in the proposed ALUCP safety zones were discussed in Section 4.2.4. In most cases, the large homes on the affected lots would have to be demolished to allow subdivided lots to be configured to accommodate additional development. Housing conditions in this area are excellent and housing values are very high, indicating that the area is unlikely to be attractive for substantial redevelopment. Given the high property values within the Area of Potential Impact, it is difficult to envision how low- and moderate-income housing could be feasible in the area.

¹²⁸ As discussed in Section 4.2.4, four R-3-zoned lots in the safety zones are developed at less than the maximum density permitted in the R-3 – Multiple-Family zone. Given the attractiveness of the neighborhood and the high value of housing in Coronado, it is reasonable to assume that the property owners may be interested in redeveloping the properties to maximize the number of housing units.

5. ALTERNATIVES

5.1 INTRODUCTION

In addition to analyzing the direct, indirect, and cumulative environmental impacts of the proposed Airport Land Use Compatibility Plan (ALUCP), California Environmental Quality Act (CEQA) requires discussion and consideration of a reasonable range of alternatives to the proposed project. When identifying reasonable alternatives, the lead agency should consider whether the alternative would: (1) meet the basic project objectives; (2) be feasible; and (3) avoid potentially significant environmental impacts.¹ After identifying the reasonable range of alternatives, the Environmental Impact Report (EIR) must evaluate the comparative merits of the alternatives.²

To be feasible, an alternative must be "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors."³ In the case of the proposed ALUCP, state law requires that the ALUCP be consistent with the noise and safety standards of the Air Installations Compatible Use Zones (AICUZ)⁴ and that the Airport Land Use Commission (ALUC) be guided in the preparation of the ALUCP by the information in the *California Airport Land Use Planning Handbook* (the Caltrans Handbook), prepared by the California Department of Transportation, Division of Aeronautics (Caltrans).⁵ No feasible alternatives were identified that could meet the project objectives and lessen the environmental impact of the proposed ALUCP while fully complying with the ALUC's statutory obligations. For purposes of this EIR, two alternatives that would lessen environmental impacts while partially complying with the ALUC's statutory obligations were identified. As required by CEQA, the no-project alternative is also evaluated in this section.⁶

The three alternatives evaluated in the EIR include:

- Alternative 1, the No-Project Alternative;
- Alternative 2, the adoption of an ALUCP without the proposed limits on increases in density of residential development and the intensity of nonresidential development;
- Alternative 3, the application of ALUCP noise and safety policies only to parcels that are sited completely within the noise contours and/or safety zones.

These three alternatives would result in reduced environmental impacts compared with the proposed ALUCP. Due to the nature of the ALUCP, there are no alternative locations for the proposed project, so this EIR does not evaluate alternative locations.⁷

¹ California Code of Regulations, Title 14, § 15126.6(c).

² California Code of Regulations, Title 14, § 15126.6(c).

³ California Code of Regulations, Title 14, § 15364 and § 15126.6 (f)(1).

⁴ California Public Utilities Code, § 21675(b).

⁵ California Public Utilities Code, § 21674.7. The latest version of the Caltrans Handbook was published in October 2011.

⁶ California Code of Regulations, Title 14, § 15126.6(e)(1).

⁷ California Code of Regulations, Title 14, § 15126.6(f)(2).

5.2 SIGNIFICANT IMPACTS OF PROPOSED ALUCP

Table 5-1 is a reproduction of Table 4-11 from Section 4.2.4.7 of this EIR. It summarizes the amount of potentially displaced development with implementation of the proposed ALUCP. As discussed in Section 4.2.4.4, the potential displacement of hotel/resort gross floor area is considered a potentially significant impact. The other displacement effects are considered less than significant.

TABLE 5-1 SUMMARY OF POTENTIALLY DISPLACED DEVELOPMENT WITH ALUCP

| LAND USE | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) ¹ | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² |
|---|----------------|-----------------------------------|---|--|
| Potential Displacement of Residential Development and Nonresidential Expansion | | | | |
| Single-Family Residential | 28 | – | – | – |
| Multiple-Family Residential | 8 | – | – | – |
| Commercial | – | 3,850 to 25,550 | – | – |
| Resort | – | 38,023 ³ | – | – |
| Potential Displacement of Incompatible Nonresidential Land Uses | | | | |
| Child Day Care Centers, Nurseries, Preschools ⁴ | – | – | 23,759 ⁵ | 424,212 |
| K-12 Schools ⁴ | – | – | 23,759 ⁵ | 54,719 |
| Trade Schools ⁴ | – | – | 23,759 ⁵ | 445,714 |
| Colleges and Universities (classrooms) ⁴ | – | – | 23,759 ⁵ | 0 |
| Places of Religious Assembly ⁴ | – | – | 23,759 ⁵ | 54,719 |
| Places of Public/Fraternal Assembly | – | – | 23,759 ⁵ | 207,101 |
| Hotels, Motels | – | – | 0 | 22,605 |
| Light Manufacturing (textiles, clothing, precision instruments) | – | – | 0 | 22,605 |
| Theaters | – | – | 23,759 ⁵ | 22,605 |
| Totals | 36 | 41,873 to 63,573 | 0 to 23,759⁶ | 0 to 445,714⁶ |

NOTES:

- 1 Includes only leasable floor area on the upper floors of two commercial buildings, one of which is on a parcel that is considered potentially developable and is also considered in the column to the right.
- 2 Includes the total parcel area subject to potential displacement, rather than estimated floor area of potentially displaced development.
- 3 This is considered the practical maximum amount of potential gross floor area displacement assuming that the Hotel del Coronado remains substantially as-is, in conformance with the 2011 Amended Master Plan. Based on current zoning, which allows a maximum FAR of 1.8, complete redevelopment of the Hotel del Coronado property could yield a gross floor area of 2,204,832 square feet, 1,246,269 square feet more than proposed in the 2011 Amended Master Plan. This maximum level of development is unlikely because of numerous site constraints, including the three-story maximum height limit in the H-M zone, the historic status of the main hotel building and other accessory buildings, the property's location in the Coastal zone, and the geologic fault on the property.
- 4 The Noise Element of the General Plan considers these uses as "normally unacceptable" in areas exposed to noise above 65 dB CNEL. All parts of Coronado within the NASNI safety zones are also within the 65 dB CNEL contour.
- 5 Includes 20,479 square feet of floor area on the upper floors of Coronado Plaza (map ID 43 on Exhibit 4-9) and 3,280 square feet of floor area on the second floor of the building at the corner of Loma and Orange Avenues (map ID 42 on Exhibit 4-9).
- 6 The data in these columns includes many of the same parcels, so the data cannot be validly summed. The "totals" represent the total leasable area or parcel area involved for each type of displaced development noted in the corresponding column.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-3.

5.3 OBJECTIVES OF PROPOSED ALUCP

The proposed ALUCP is intended to promote compatibility between NASNI and surrounding land uses for the protection of public health, safety, and welfare in areas around the Airport, to the extent that these areas are not already devoted to incompatible uses. The goals of the airport land use compatibility policies, as described in Section 2.2, are to:

1. Promote the compatibility of land uses within noise contours by:
 - a) Limiting new noise-sensitive development within the 65 decibel (dB) Community Noise Equivalent Level (CNEL) and higher noise contours to avoid an increase in existing land use incompatibility;
 - b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards.
2. Protect public safety by:
 - a) Limiting new risk-sensitive land uses within safety zones;
 - b) Avoiding an increase in existing land use incompatibility within the safety zones.
3. Protect NASNI airspace and the safety of flight by:
 - a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards;
 - b) Limiting potential hazards to flight within the airspace protection boundary.
4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the Airport Influence Area (AIA).

The alternatives discussed in the following sections are evaluated in terms of their environmental impacts and their ability to achieve these project objectives.

5.4 ALTERNATIVE 1 – NO PROJECT

CEQA requires evaluation of a no-project alternative to enable decision makers to compare the impacts of the proposed project with the impacts of continuing to operate under the status quo.⁸ The no-project alternative analysis must discuss the existing conditions at the time the notice of preparation is published and assess what "would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans."⁹

Where the proposed project is the "revision of an existing land use or regulatory plan ..., the 'no project' alternative will be the continuation of the existing plan ...into the future" and the "projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."¹⁰

5.4.1 DESCRIPTION OF ALTERNATIVE 1

Because an ALUCP has never been adopted for NASNI, the No-Project Alternative involves the continued applicability of the existing local agency land use planning and regulatory framework.

⁸ California Code of Regulations, Title 14, § 15126.6(e)(1).

⁹ California Code of Regulations, Title 14, § 15126.6(e)(2).

¹⁰ California Code of Regulations, Title 14, § 15126.6(e)(3)(A).

5.4.2 ENVIRONMENTAL IMPACTS OF ALTERNATIVE 1

Under Alternative 1, the No-Project Alternative, all environmental impacts described in the Initial Study¹¹ and in Section 4.2.4 of this EIR would be avoided.

5.4.3 ATTAINMENT OF PROJECT OBJECTIVES

The No-Project Alternative would fail to meet most project objectives and could only partially achieve one of the project objectives identified in Subsection 5.3, as summarized in **Table 5-2**.

While the No-Project Alternative would partially achieve Objective 4, related to the promotion of awareness of aircraft overflights among prospective buyers of new housing, it would fail to achieve the other objectives. Other major shortcomings include:

- Failure of the ALUC to achieve its statutory mandate to establish an ALUCP for NASNI¹²
- Failure to reflect the most recent AICUZ study for NASNI in an ALUCP¹³
- Failure to consider the noise compatibility guidance in the 2011 Caltrans Handbook¹⁴
- Failure to consider the safety compatibility guidance in the 2011 Caltrans Handbook¹⁵
- Failure to apply guidance from the 2011 Caltrans Handbook for the avoidance of potential hazards to flight¹⁶
- Failure to reflect the overflight notification guidance in the 2011 Caltrans Handbook¹⁷

In conclusion, the No-Project Alternative would fail to fully meet all of the project objectives identified in Section 5.3 and would fail to consider the guidance in the Caltrans Handbook. Most importantly, the No-Project Alternative would fail to comply with state laws mandating the adoption of an ALUCP for NASNI¹⁸ and that the ALUCP is consistent with the noise and safety policies of the AICUZ prepared for NASNI.¹⁹

¹¹ Appendix A, *Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study*, April 2019, Section 4, Environmental Impacts.

¹² California Public Utilities Code, §§ 21675(a) and (b).

¹³ California Public Utilities Code, § 21675(b).

¹⁴ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-2 – 3-5, 3-47 – 3-48, 4-1 – 4-12, 4-46.

¹⁵ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-11 – 3-12, 3-47 – 3-48, 4-15 – 4-34, 4-41 – 4-43.

¹⁶ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-28 – 3-36, 3-47 – 3-48, 4-34 – 4-41.

¹⁷ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-8 – 3-11, 3-47 – 3-48, 4-13 – 4-15.

¹⁸ California Public Utilities Code § 21675(a).

¹⁹ California Public Utilities Code § 21675(b).

TABLE 5-2 OBJECTIVES OF PROPOSED ALUCP ACHIEVED BY ALTERNATIVE 1 – NO PROJECT

| OBJECTIVES OF PROPOSED ALUCP | ACHIEVED BY ALTERNATIVE 1 |
|---|---|
| 1. Promote the compatibility of land uses within noise contours by: | |
| a. Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility | No. The Noise Element of the General Plan describes single-family and multiple-family dwellings, schools, churches, libraries, parks and playgrounds as “clearly unacceptable” at noise levels above 75 dB CNEL. Mobile homes, auditoriums, and concert halls are considered “clearly unacceptable” above 70 dB CNEL. Land uses considered “normally unacceptable” include schools, churches, libraries, auditoriums, and concert halls above 60 dB CNEL, single-family and multiple-family dwellings, schools, churches, libraries, parks and playgrounds above 65 dB CNEL, and high-rise residences, hotels, motels, golf courses, and riding stables above 70 dB CNEL. ¹ No land use regulations implementing these provisions have been adopted by the City of Coronado. |
| b. Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards | No. Although the implementation section of the Noise Element calls for the establishment of building code requirements ensuring adequate sound insulation for uses considered “normally unacceptable” in noise exposure areas, ² no such regulations have been adopted by the City of Coronado. |
| 2. Protect public safety by: | |
| a. Limiting new risk-sensitive land uses within safety zones | No. The Safety Element of the Coronado General Plan includes a policy stating that “the most current ‘Air Installations Compatible Use Zones Study’ ... will be consulted by the City prior to approval of any discretionary land use permit or approval that would modify the use, density or intensity of development permitted for a property in said Compatible Use Zones.” ³ No corresponding land use regulations have been adopted by the City of Coronado. |
| b. Avoiding an increase in existing land use incompatibility within the safety zones | No. See discussion of Safety Element of General Plan, above. |
| 3. Protect NASNI airspace and the safety of flight by: | |
| a. Limiting the height of new structures and objects within the airspace protection boundary per FAA standards | No. While the federal Part 77 regulations and state law enforcing FAA airspace determinations ²⁰ would remain in effect, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Thus, compliance with the federal regulations in the airspace protection area is less than complete. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process in their project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review. |
| b. Limiting potential hazards to flight within the airspace protection boundary | No. As noted above, while the federal Part 77 regulations and state law enforcing FAA airspace determinations ²¹ would remain in effect, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process into their project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review. In addition, other potential hazards to flight would be less likely to be identified, including sources of glare; lighting that can interfere with vision or be confused with airport identification and navigational lighting; dust, water vapor, and smoke; thermal plumes; electromagnetic interference with communications, radar, and navigational signals; and bird attractants. |
| 4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA | Partially. Without the AIA established in the proposed ALUCP, the buyer awareness measures of the state real estate law would apply to an area within two statute miles of NASNI, ⁴ and within other areas covered by the AIAs for San Diego International Airport, NOLF Imperial Beach, and Brown Field Municipal Airport. These combined areas are considerably smaller than the AIA in the proposed ALUCP. |

NOTES:

- 1 *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), Figure 2.
- 2 *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L15.
- 3 *City of Coronado General Plan*, Chapter K, Safety Element, February 15, 2005, p. II-K22.
- 4 “If there is not an available current airport influence map, a written disclosure of an airport located within two statute miles of the subject property shall satisfy this disclosure requirement.” California Department of Real Estate, *Disclosures in Real Property Transactions*, 2005, p.9.

SOURCE: Ricondo & Associates, Inc., November 2019.

²⁰ California Public Utilities Code, §§ 21657, 21659(b).

²¹ California Public Utilities Code, §§ 21657, 21659(b).

5.5 ALTERNATIVE 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES

This alternative was identified based on discussions with the Working Group²² during the preparation of the proposed ALUCP policies and standards and based on scoping comments received from the City of Coronado. Alternative 2 would eliminate the limits on increases in existing residential density (number of dwelling units per acre) and existing nonresidential intensity (gross floor area) in the safety zones. Thus, this alternative would enable increases in existing residential density and nonresidential gross floor area up to the maximums allowed under current zoning.²³ This alternative would not change the ALUCP standards limiting the development of new, incompatible nonresidential land uses in the safety zones. The noise airspace, and overflight policies and standards of the proposed ALUCP also would remain unchanged.

This alternative was developed recognizing that most of the displacement impacts attributable to the proposed ALUCP would be caused by the limits on increases in residential density and nonresidential floor area. Thus, Alternative 2 would reduce, but not fully eliminate, the environmental displacement impacts of the proposed ALUCP.

5.5.1 ENVIRONMENTAL IMPACTS OF ALTERNATIVE 2

As indicated in **Table 5-3**, this alternative would eliminate the potential displacement of new single-family and multiple-family residential units in areas currently zoned residential and the expansion of nonresidential floor area in existing development.

TABLE 5-3 COMPARISON OF LAND USE IMPACTS OF PROPOSED ALUCP AND ALTERNATIVE 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES

| LAND USE | PROPOSED ALUCP POTENTIAL DEVELOPMENT DISPLACEMENT | | ALTERNATIVE 2 POTENTIAL DEVELOPMENT DISPLACEMENT | |
|-----------------------------|--|--------------------------------------|---|--------------------------------------|
| | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) |
| Single-Family Residential | 28 | – | 0 | – |
| Multiple-Family Residential | 8 | – | 0 | – |
| Commercial | – | 3,850 to 25,550 | – | 0 |
| Resort | – | 38,023 ¹ | – | 0 |
| Totals | 36 | 41,873 to 63,573 | 0 | 0 |

NOTE:

1 This is considered the practical maximum amount of potential gross floor area displacement assuming that the Hotel del Coronado remains substantially as-is, in conformance with the 2011 Amended Master Plan. Based on current zoning, which allows a maximum floor area ratio (FAR) of 1.8, complete redevelopment of the Hotel del Coronado property could yield a gross floor area of 2,204,832 square feet, 1,246,269 square feet more than proposed in the 2011 Amended Master Plan. This maximum level of development is unlikely because of numerous site constraints, including the three-story maximum height limit in the H-M zone, the historic status of the main hotel building and other accessory buildings, the property's location in the Coastal zone, and the geologic fault on the property.

SOURCE: Ricondo & Associates, Inc., November 2019.

As indicated in **Table 5-4**, the potential displacement of new incompatible nonresidential land uses with implementation of the proposed ALUCP would remain unchanged with Alternative 2.

²² See Section 2.3 of this EIR for a discussion of the NASNI ALUCP Working Group.

²³ Changes in General Plan land use designations and rezonings to increase residential density and nonresidential intensity above the maximums allowed under current zoning would continue to be considered incompatible.

TABLE 5-4 COMPARISON OF INCOMPATIBLE NONRESIDENTIAL LAND USE DISPLACEMENT WITH PROPOSED ALUCP AND ALTERNATIVE 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES

| LAND USE | DISPLACEMENT WITH PROPOSED ALUCP | | DISPLACEMENT WITH ALTERNATIVE 2 | |
|---|---|--|--|--|
| | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) ¹ | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² |
| Child Day Care Centers, Nurseries, Preschools ³ | 23,759 ⁴ | 424,212 | 23,759 ⁴ | 424,212 |
| K-12 Schools ³ | 23,759 ⁴ | 54,719 | 23,759 ⁴ | 54,719 |
| Trade Schools ³ | 23,759 ⁴ | 445,714 | 23,759 ⁴ | 445,714 |
| Colleges and Universities (classrooms) ³ | 23,759 ⁴ | 0 | 23,759 ⁴ | 0 |
| Places of Religious Assembly ³ | 23,759 ⁴ | 54,719 | 23,759 ⁴ | 54,719 |
| Places of Public/Fraternal Assembly | 23,759 ⁴ | 207,101 | 23,759 ⁴ | 207,101 |
| Hotels, Motels | 0 | 22,605 | 0 | 22,605 |
| Light Manufacturing (textiles, clothing, precision instruments) | 0 | 22,605 ⁶ | 0 | 22,605 |
| Theaters | 23,759 ⁵ | 22,605 | 23,759 ⁵ | 22,605 |
| Totals | 0 to 23,759⁵ | 0 to 445,714⁵ | 0 to 23,759⁵ | 0 to 445,714⁵ |

NOTES:

- 1 Includes only leasable floor area on the upper floors of two commercial buildings, one of which is on a parcel that is considered potentially developable and is also considered in the column to the right.
- 2 Includes the total parcel area subject to potential displacement, rather than estimated floor area of potentially displaced development.
- 3 The Noise Element of the General Plan considers these uses as “normally unacceptable” in areas exposed to noise above 65 dB CNEL. All parts of Coronado within the NASNI safety zones are also within the 65 dB CNEL contour.
- 5 Includes 20,479 square feet of floor area on the upper floors of Coronado Plaza (map ID 43 on Exhibit 4-9) and 3,280 square feet of floor area on the second floor of the building at the corner of Loma and Orange Avenues (map ID 42 on Exhibit 4-9).
- 6 The data listed in these columns includes many of the same parcels, so the data cannot be validly summed. The “totals” represent the total leasable area or parcel area involved for each measure of displaced development noted in the corresponding column.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-3.

5.5.2 ATTAINMENT OF PROJECT OBJECTIVES

Alternative 2 would accomplish some of the objectives of the proposed ALUCP, as summarized in **Table 5-5**. This Alternative would fail to achieve Objective 1(a), limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours; Objective 2(a), limiting new risk-sensitive land uses within safety zones; and Objective 2(b), avoiding an increase in land use incompatibility in the safety zones. By allowing residential development up to the maximum density permitted by current zoning, implementation of Alternative 2 would enable up to 36 additional dwelling units within the noise contours and safety zones.

Alternative 2 would also fail to achieve Objective 2(b) by allowing the expansion of nonresidential development to the maximum allowed by current zoning. This could result in an increase of up to 25,550 square feet of commercial development and 38,023 square feet of hotel/resort development (all at the Hotel del Coronado) within the safety zones.

TABLE 5-5 OBJECTIVES OF PROPOSED ALUCP ACHIEVED BY ALTERNATIVE 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES

| OBJECTIVES OF PROPOSED ALUCP | ACHIEVED BY ALTERNATIVE 2 |
|---|--|
| 1. Promote the compatibility of land uses within noise contours by: | |
| a) Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility | No. While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), it would allow the potential development of up to 36 new residential units in those areas. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and PUC § 21674.7. |
| b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards | Yes. The noise level reduction standards of the proposed ALUCP would be unchanged with Alternative 2. |
| 2. Protect public safety by: | |
| a) Limiting new risk-sensitive land uses within safety zones | No. While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), the potential development of up to 36 new residential units in those areas would be possible. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and PUC § 21674.7. |
| b) Avoiding an increase in existing land use incompatibility within the safety zones | No. While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses in the safety zones, the potential development of up to 36 new residential units and 41,873 to 63,573 square feet of nonresidential development expansion in those areas would be possible. Given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development would occur with this alternative. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and PUC § 21674.7. |
| 3. Protect NASNI airspace and the safety of flight by: | |
| a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards | Yes. The airspace protection policies and standards of the proposed ALUCP would be unchanged with Alternative 2. |
| b) Limiting potential hazards to flight within the airspace protection boundary | Yes. The flight safety policies and standards of the proposed ALUCP would be unchanged with Alternative 2. |
| 4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA | |
| | Yes. The overflight notification policy of the proposed ALUCP would be unchanged with Alternative 2. |

SOURCE: Ricondo & Associates, Inc., November 2019.

A serious shortcoming of Alternative 2 relates to the maximum development intensity permitted in the H-M – Hotel-Motel zoning district. Current zoning allows a maximum floor area ratio (FAR) of 1.8.²⁴ The proposed FAR of the Hotel del Coronado after implementation of the 2011 Amended Master Plan is 0.78. As discussed in Appendix B, substantial obstacles exist that would limit the site from being developed to that level of intensity,

²⁴ FAR is the ratio of building floor area to lot area.

especially as long as the historic hotel buildings are preserved.²⁵ If, however, the Hotel del Coronado property was ever completely redeveloped, the existing zoning would allow development to a much greater intensity than would otherwise be possible. Implementation of Alternative 2 would remove any safeguards against this eventuality.

Importantly, this Alternative would conflict with the AICUZ recommendation that local agencies “not take actions that would make an existing land use compatibility (or incompatibility) situation worse (for example by allowing increased densities in redevelopment of currently low density incompatible land uses).”²⁶ Alternative 2 also fails in meeting the legal requirement that the ALUCP be consistent with the noise and safety standards of the AICUZ.²⁷ This Alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP which requires consistency with the AICUZ noise and safety standards.²⁸

5.6 ALTERNATIVE 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES

The boundaries of the proposed ALUCP noise contours and safety zones split many parcels. Thirty-seven parcels with more than 50 percent of their area within the safety zones or 65 dB CNEL contour are partially outside any safety zone or noise contour. A proposed ALUCP policy states that new or reconstructed buildings would be subject to the standards of the safety zone and/or noise contour in which the greatest proportion of habitable space, for a residential building, or gross floor area, for a nonresidential building, is located.

Alternative 3 would apply the noise and safety standards of each noise contour range and safety zone only to parcels that are sited completely within a given noise contour range and/or safety zone. Parcels that are split by those boundaries would have to comply with the standards of the less restrictive noise contour range or safety zone. Thus, a parcel split by the 70 dB CNEL contour would have to comply with the standards of the 65 to 70 dB CNEL range. Parcels split between APZ I and APZ II would have to comply with the standards of the APZ II safety zone. Parcels that are split by the 65 dB CNEL contour would not be subject to any noise standards. Parcels that are partially inside a safety zone and partially outside any other safety zone would not be subject to any safety standards. This alternative is based on suggestions made by City of Coronado staff at Working Group meetings during the ALUCP planning process.

5.6.1 ENVIRONMENTAL IMPACTS OF ALTERNATIVE 3

In the R-1A – Single-Family zoning district, this alternative would effectively remove five parcels split by the Clear Zone (and partially outside any other safety zone) and 12 parcels split by the APZ I boundary (and partially outside any other safety zone) from the ALUCP safety zones. None of these parcels are large enough to be subdivided to

²⁵ Those obstacles include the maximum 3-story height limit in the H-M zoning district, the historic status of the Hotel del Coronado, public beach access requirements, and the fault zone no-build area. See Appendix B, *Revised Analysis of Potentially Displaced Development—Hotel del Coronado*, p. B-5.

²⁶ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

²⁷ California Public Utilities Code § 21675(b).

²⁸ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

accommodate additional dwelling units. The alternative would remove three parcels zoned R-3 – Multiple-Family Residential split by the APZ I boundary (and partially outside any other safety zone), as indicated on Exhibit 4-6. One of these parcels has additional development capacity of two units. Two C – Commercial-zoned properties split by the APZ I boundary (and partially outside any other safety zone), as depicted on Exhibit 4-8, have additional development capacity. One H-M – Hotel-Motel-zoned property (the Hotel del Coronado) split by the APZ I boundary (and partially outside any other safety zone), as depicted on Exhibit 4-2 and Exhibit B-2 in Appendix B, has additional development capacity.

Fourteen parcels that are split by the 65 dB CNEL contour (and that are outside any other noise contour) would not be subject to the sound attenuation requirements of the proposed ALUCP under Alternative 3.

Table 5-6 compares the impact of the proposed ALUCP on the potential displacement of dwelling units and nonresidential expansion with the impact of Alternative 3. The number of potentially displaced housing units with Alternative 3 would decrease from 36 to 2. The amount of potentially displaced nonresidential floor area expansion would decrease to zero with this alternative.

TABLE 5-6 COMPARISON OF LAND USE IMPACTS OF PROPOSED ALUCP AND ALTERNATIVE 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES

| LAND USE | PROPOSED ALUCP POTENTIAL DEVELOPMENT DISPLACEMENT | | ALTERNATIVE 3 POTENTIAL DEVELOPMENT DISPLACEMENT | |
|-----------------------------|--|-----------------------------------|---|-----------------------------------|
| | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) | DWELLING UNITS | EXPANDED GROSS FLOOR AREA (SQ FT) |
| Single-Family Residential | 28 | – | 28 | – |
| Multiple-Family Residential | 8 | – | 6 | – |
| Commercial | – | 3,850 to 25,550 | – | 0 |
| Resort | – | 38,023 ¹ | – | 0 |
| Totals | 36 | 41,873 to 63,573 | 34 | 0 |

NOTE:

1 This is considered the practical maximum amount of potential gross floor area displacement assuming that the Hotel del Coronado remains substantially as-is, in conformance with the 2011 Amended Master Plan. Based on current zoning, which allows a maximum floor area ratio (FAR) of 1.8, complete redevelopment of the Hotel del Coronado property could yield a gross floor area of 2,204,832 square feet, 1,246,269 square feet more than proposed in the 2011 Amended Master Plan. This maximum level of development is unlikely because of numerous site constraints, including the three-story maximum height limit in the H-M zone, the historic status of the main hotel building and other accessory buildings, the property’s location in the Coastal zone, and the geologic fault on the property.

SOURCE: Ricondo & Associates, Inc., November 2019.

Two parcels that could potentially accommodate new incompatible nonresidential land uses are split by the APZ I boundary and would be essentially removed from the safety zone under Alternative 3. The affected properties, Parcels 21 and 42, are depicted on Exhibit 4-8. Parcel 21 is 8,846 square feet in area; Parcel 42 is 10,566 square feet in area. The existing building on Parcel 42 has 3,280 square feet of potentially leasable area on the upper floor.²⁹

Table 5-7 compares the potential nonresidential land use displacement with the ALUCP and with Alternative 3. The potential displacement of new nonresidential floor area would be reduced by 3,280 square feet. The parcel area subject to the potential displacement of child day care centers, nurseries, preschools, and trade schools would be reduced by 31,451 square feet. The parcel area subject to the displacement of hotels and motels, light

²⁹ Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-2.

manufacturing, and theaters would be reduced by 22,605 square feet. The parcel area subject to the displacement of places of public/fraternal assembly would be reduced by 12,039 square feet. The parcel area involved in the potential displacement of K-12 schools and places of religious assembly would not change.

TABLE 5-7 COMPARISON OF INCOMPATIBLE NONRESIDENTIAL LAND USE DISPLACEMENT WITH PROPOSED ALUCP AND ALTERNATIVE 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES

| LAND USE | DISPLACEMENT WITH PROPOSED ALUCP | | DISPLACEMENT WITH ALTERNATIVE 3 | |
|---|---|--|--|--|
| | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) ¹ | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² | NEW INCOMPATIBLE NONRESIDENTIAL FLOOR AREA (SQ FT) | NEW INCOMPATIBLE NONRESIDENTIAL PARCEL AREA (SQ FT) ² |
| Child Day Care Centers, Nurseries, Preschools ³ | 23,759 ⁴ | 424,212 | 20,479 | 392,761 |
| K-12 Schools ³ | 23,759 ⁴ | 54,719 | 20,479 | 54,719 |
| Trade Schools ³ | 23,759 ⁴ | 445,714 | 20,479 | 414,263 |
| Colleges and Universities (classrooms) ³ | 23,759 ⁴ | 0 | 20,479 | 0 |
| Places of Religious Assembly ³ | 23,759 ⁴ | 54,719 | 20,479 | 54,719 |
| Places of Public/Fraternal Assembly | 23,759 ⁴ | 207,101 | 20,479 | 195,062 |
| Hotels, Motels | 0 | 22,605 | 0 | 0 |
| Light Manufacturing (textiles, clothing, precision instruments) | 0 | 22,605 | 0 | 0 |
| Theaters | 23,759 ⁵ | 22,605 | 20,479 | 0 |
| Totals | 0 to 23,759⁵ | 0 to 445,714⁵ | 0 to 20,479⁵ | 0 to 414,263⁵ |

NOTES:

- 1 Includes only leasable floor area on the upper floors of two commercial buildings, one of which is on a parcel that is considered potentially developable and is also considered in the column to the right.
- 2 Includes the total parcel area subject to potential displacement, rather than estimated floor area of potentially displaced development.
- 3 The Noise Element of the General Plan considers these uses as “normally unacceptable” in areas exposed to noise above 65 dB CNEL. All parts of Coronado within the NASNI safety zones are also within the 65 dB CNEL contour.
- 4 Includes 20,479 square feet of floor area on the upper floors of Coronado Plaza (map ID 43 on Exhibit 4-9) and 3,280 square feet of floor area on the second floor of the building at the corner of Loma and Orange Avenues (map ID 42 on Exhibit 4-9).
- 5 The data listed in these columns includes many of the same parcels, so the data cannot be validly summed. The “totals” represent the total leasable area or parcel area involved for each measure of displaced development noted in the corresponding column.

SOURCE: Appendix D, *Corrections to Initial Study Analysis of Potentially Displaced Development*, Table D-3.

5.6.2 ATTAINMENT OF PROJECT OBJECTIVES

Alternative 3 would accomplish some of the objectives of the proposed ALUCP, as summarized in **Table 5-8** (Objectives 3(a), 3(b), and 4). This alternative would fail to achieve Objective 1(a), limiting new noise-sensitive development within the 65 dB CNEL contour; Objective 1(b), ensuring that new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards; Objective 2(a), limiting new risk-sensitive land uses within safety zones; and Objective 2(b), avoiding an increase in land use incompatibility in the safety zones.

TABLE 5-8 OBJECTIVES OF PROPOSED ALUCP ACHIEVED BY ALTERNATIVE 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES

| OBJECTIVES OF PROPOSED ALUCP | ACHIEVED BY ALTERNATIVE 3 |
|---|--|
| 1. Promote the compatibility of land uses within noise contours by: | |
| a) Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility | No. While implementation of Alternative 3 would limit the development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), an additional 2 multiple-family residential units could be developed in those areas compared with the proposed ALUCP. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and PUC § 21674.7. |
| b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards | No. By effectively removing approximately 14 residential-zoned lots from within the 65 dB CNEL contour, Alternative 3 would increase the number of noise-sensitive land uses that could be expanded without being treated to reduce interior sound levels per the proposed ALUCP, including reconstructed homes and accessory dwelling units. ¹ This alternative also implicitly reduces the size of the AICUZ noise contours by removing split parcels from complying with standards of the higher noise contour range. This makes this alternative inconsistent with the standards of the AICUZ and PUC § 21674.7. |
| 2. Protect public safety by: | |
| a) Limiting new risk-sensitive land uses within safety zones | No. By effectively removing 17 properties in the safety zones, Alternative 3 would increase the number of risk-sensitive land uses that could potentially be developed within the safety zones. As indicated in Table 5-6, two additional multiple-family residential units could potentially be developed. As indicated in Table 5-7, an additional 3,280 square feet of leasable area in existing buildings and 31,451 square feet of land area would become available for the development of new incompatible nonresidential land uses. This alternative also implicitly reduces the size of the safety zones by removing split parcels from the need to comply with standards of the more restrictive safety zone. This makes this alternative inconsistent with the standards of the AICUZ and PUC § 21674.7 . |
| b) Avoiding an increase in existing land use incompatibility within the safety zones | No. By effectively removing 17 properties in the safety zones, Alternative 3 would increase the number of properties where existing incompatible development could be expanded. An additional 2 new multiple-family residential units and 41,873 to 63,573 square feet of nonresidential development expansion could occur. Given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development would occur with this alternative. This alternative also implicitly reduces the size of the safety zones by removing split parcels from the need to comply with standards of the more restrictive safety zone, potentially allowing the development of 2 more multiple-family residential units than the proposed ALUCP. This makes this alternative inconsistent with the standards of the AICUZ and PUC § 21674.7. |
| 3. Protect NASNI airspace and the safety of flight by: | |
| a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards | Yes. The airspace protection policies and standards of the proposed ALUCP would be unchanged with Alternative 3. |
| b) Limiting potential hazards to flight within the airspace protection boundary | Yes. The flight safety policies and standards of the proposed ALUCP would be unchanged with Alternative 3. |
| 4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA | |
| | Yes. The overflight notification policy of the proposed ALUCP would be unchanged with Alternative 3. |

NOTE:

¹ In addition, homes on these lots that are expanded by 50 percent or more of their original habitable area and partially reconstructed homes involving 50 percent or more of their original habitable area would not be subject to the sound attenuation treatment standards. The interior sound level standards applying within the 65 dB CNEL and higher contours are presented in Section 2, Project Description, Table 2-2, Standards for Noise and Safety Compatibility.

SOURCE: Ricondo & Associates, Inc., November 2019.

Alternative 3 would fail to achieve Objective 1(a) by enabling the development of two additional multiple-family residential units in the portion of the safety zones within the 65 dB CNEL.

This Alternative would fail to achieve Objective 1(b) because approximately 14 residential-zoned properties would be effectively removed from the 65 dB CNEL contour. The existing homes and multiple-family buildings on these properties could be expanded by 50 percent more than their original habitable area without the enlarged portion of the buildings being treated to reduce interior sound levels. Similarly, accessory dwelling units could also be built on these properties without sound attenuation treatment.

This Alternative would fail to achieve Objective 2(a). By effectively removing 17 properties in the safety zones, two additional multiple-family dwellings could potentially be developed. An additional 3,280 square feet of leasable area in existing buildings and 31,451 square feet of land area also would become available for the development of new risk-sensitive land uses.

This Alternative also would fail to achieve Objective 2(b) by effectively removing from the safety zones properties zoned C – Commercial and H-M – Hotel-Motel. This could result in an increase of up to 25,550 square feet of commercial development and 38,023 square feet of hotel/resort development (all at the Hotel del Coronado) compared with the proposed ALUCP.

As with Alternative 2, a potentially serious shortcoming of Alternative 3 relates to the maximum development intensity permitted in the H-M – Hotel-Motel zoning district. Current zoning allows a maximum FAR of 1.8.³⁰ The proposed FAR of the Hotel del Coronado, after implementation of the 2011 Amended Master Plan is 0.78. As discussed in Appendix B, substantial obstacles exist that would limit the site from being developed to that level of intensity, especially as long as the historic hotel buildings are preserved.³¹ If, however, the Hotel del Coronado property was ever completely redeveloped, the existing zoning would allow development to a much greater intensity than would otherwise be possible. By effectively removing the property from the safety zones, implementation of Alternative 3 would remove any safeguards against this eventuality.

Importantly, this Alternative would conflict with the AICUZ study. As noted in Table 5-7, it would essentially reduce the size of the noise contours and the safety zones. In addition, it would conflict with the AICUZ recommendation that local agencies “not take actions that would make an existing land use compatibility (or incompatibility) situation worse (for example by allowing increased densities in redevelopment of currently low density incompatible land uses).”³² Both of these conditions would cause Alternative 3 to fail in meeting the legal requirement that the ALUCP be consistent with the noise and safety standards of the AICUZ.³³ In failing to be consistent with the AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.³⁴

³⁰ FAR is the ratio of building floor area to lot area.

³¹ Those obstacles include the maximum 3-story height limit in the H-M zoning district, the historic status of the Hotel del Coronado, public beach access requirements, and the fault zone no-build area. See Appendix B, *Revised Analysis of Potentially Displaced Development—Hotel del Coronado*, p. B-5.

³² The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

³³ California Public Utilities Code § 21675(b).

³⁴ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47

5.7 OTHER ALTERNATIVES CONSIDERED AND REJECTED

While various approaches to proposed ALUCP policies and standards were discussed by the Working Group during the ALUCP planning process, only those reviewed in the previous section (Alternatives 2 and 3) involved policy alternatives that could reduce the environmental impacts of the Proposed Project. Other issues discussed in Working Group meetings involved variations in administrative procedures, such as the ALUC project review process and coordination of ALUC review with the FAA's OE/AAA review process, the appropriate description and implementation of sound attenuation standards, and criteria for determining when certain land uses and building features could cause potential hazards to flight.³⁵

Two other alternatives that were not specifically considered during the ALUCP planning process merit discussion.

5.7.1 ELIMINATION OF SOUND ATTENUATION STANDARDS

Some members of the Working Group expressed concern with including sound attenuation standards in the ALUCP for new and expanded residential units and other noise-sensitive land uses within the 65 dB CNEL and higher noise contours. Consideration of this policy alternative in the EIR was rejected for two reasons: (1) it would directly conflict with Objective 1(b) of the proposed ALUCP and with the AICUZ³⁶ (and, by implication, with Public Utilities Code Section 21674.7), and (2) it would not reduce the environmental impacts of the proposed ALUCP.

As documented in Section 4 of the EIR, impacts of the proposed ALUCP relate to policies that would make certain kinds of future development incompatible. With local government implementation of the ALUCP, development of those incompatible uses would not be permissible in the safety zones or 65 dB CNEL and higher noise contours. Implementation of the sound attenuation standards, on the other hand, would not prevent the development of any future land uses.³⁷ Those standards would only require that sound attenuation measures be incorporated into new buildings, as described in ALUCP Table 4, Standards for Noise and Safety Compatibility.³⁸

5.7.2 ADOPTION OF AICUZ NOISE AND SAFETY COMPATIBILITY GUIDELINES

This alternative would involve the wholesale adoption of the AICUZ noise and safety compatibility guidelines as the compatibility standards of the proposed ALUCP. Those guidelines are presented in Tables C-1 (noise compatibility) and C-2 (safety) in the AICUZ study.³⁹ Both sets of guidelines are intended to guide new development in undeveloped areas around airports.

Highlights of the AICUZ noise compatibility guidelines are as follows:

- Residential uses, transient lodging (including hotels), nursing homes, and outdoor music shells and amphitheatres are considered incompatible in areas exposed to noise above 65 dB CNEL

– 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

³⁵ San Diego County Regional Airport Authority, Airport Land Use Commission, Working Group meeting notes, March 2016 to August 2017.

³⁶ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

³⁷ See the discussion of residential sound attenuation measures in Section 4.2.4 of this EIR.

³⁸ ALUCP Table 4 is reproduced as Table 2-2 in Section 2 of this EIR.

³⁹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, Table C-1, pp. C-1 – C-5, Table C-2, pp. C-6 – C-10.

- Nature exhibits and places of public assembly are considered incompatible in areas exposed to noise above 70 dB CNEL
- Many uses are considered incompatible in areas exposed to noise above 75 dB CNEL, including:
 - Hospitals and other medical services
 - Educational services
 - Most cultural, recreational, and entertainment uses
 - Resorts and group camps
 - Livestock farming and animal breeding

Highlights of the AICUZ safety compatibility guidelines are as follows:

- Within the Clear Zone, all structures and all land uses would be considered incompatible
- Within APZ-I, residential uses, transient lodgings (including hotels), retail commercial, eating and drinking establishments, professional offices, government and educational services, places of public assembly, resorts and group camps, and some manufacturing uses would be considered incompatible
- Within APZ II, the guidelines are less restrictive than in APZ I. Single-family residential uses, at densities of up to two dwelling units per acre, retail trade, professional and governmental offices would be considered compatible. Other uses considered incompatible in APZ I would also be incompatible in APZ II.

Potential noise and safety compatibility standards for this alternative are presented in **Table 5-9**. The potential standards reflect AICUZ land use compatibility guidance in a format similar to that of Table 4, Standards for Noise and Safety Compatibility, in the proposed ALUCP (which is reproduced as Table 2-2 in Section 2 of this EIR).

Based on the standards in Table 5-9, all existing land uses in the safety zones, except for parks in APZ I and II, would be incompatible. These include all residential uses in all safety zones; commercial, eating and drinking, hotel, and professional service uses in APZ I; resort uses in APZ II; and park uses in the Clear Zone.

With adoption of the AICUZ noise and safety compatibility guidelines, the ALUCP would have to include policies and standards for proposed modifications, expansions, and reconstruction of these existing incompatible land uses. These policies and standards could conceivably be similar to those in the proposed ALUCP. This alternative would also require standards for proposed land use changes and land redevelopment. These would require that reconstructed land uses and redeveloped lots would have to comply with the land use compatibility standards of Table 5-9. As existing land uses are removed and proposed for redevelopment, adherence to this standard would result in the gradual transition of the neighborhoods in the safety zones from residential (and commercial and resort) to low-intensity nonresidential land uses that would be compatible in those areas. Such a transition would likely reach a tipping point where disinvestment in the extensive residential area would start to occur, followed by urban blight. If land use conversion in the safety zones became widespread, the result would be a loss of housing units in Coronado. Thus, the adverse impacts of this alternative would be far greater than the environmental impacts of the proposed ALUCP.

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TABLE 5-9 (1 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY WITH APPLICATION OF AICUZ NOISE AND SAFETY COMPATIBILITY GUIDELINES

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 dB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|--|--|----|-------|--------|---|--|
| 10 Residences and Lodging | | | | | | |
| 111 | Single-Family including accessory dwelling units; Supportive housing; Transitional housing | | | 45 | 45 | APZ II: Maximum density of 1-2 dwelling units per acre, in addition to an accessory dwelling unit; interior noise must perform to 45 dB CNEL. Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 112, 113, 12 | Multi-Family; Group quarters; Bed and breakfast inn | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 13, 14, 15, 19 | Residential Hotel; Mobile home park; Hotel/motel | | | | 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL in sleeping areas. |
| 20-30 Manufacturing | | | | | | |
| 23, 28, 29, 31, 35, 3999 | Manufacturing: Apparel; Chemicals; Hazardous materials; Petroleum; Rubber; Plastic; Precision instruments | | | | | |
| 21, 22, 32-34 | Manufacturing: Food; Metals; Stone, clay, and glass; Textiles | | | 50 | | APZ II: Maximum FAR of 0.56; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 24-27, 39 | Manufacturing: Furniture and fixtures; Lumber and wood products; Paper; Printing and publishing; Miscellaneous manufacturing | | 50 | 50 | | APZ I: Maximum FAR of 0.28. APZ II: Maximum FAR of 0.56. APZ I/II: For public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 40 Transportation, Communication, and Utilities | | | | | | |
| 41-46, 49 | Auto parking; Boat launch ramp; Vehicle, freight, equipment storage | | 50 | 50 | | APZ I: Maximum FAR of 0.28; no passenger facilities. APZ II: Maximum FAR of 0.56. APZ I/II: For public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |

TABLE 5-9 (2 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY WITH APPLICATION OF AICUZ NOISE AND SAFETY COMPATIBILITY GUIDELINES

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ | |
|-------------------------|---|----|-------|--------|---|--|--|
| 47, 48 | Communication: Telephone, radio, television; Utilities: Electrical, including wind and solar farms; Gas; Water; Wastewater | | 50 | 50 | | <p>APZ I: Maximum FAR of 0.28; no aboveground transmission lines.</p> <p>APZ II: Maximum FAR of 0.56.</p> <p>APZ I/II: For public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.</p> | |
| 485 | Refuse Disposal: Sanitary landfill, solid waste/recycling center ⁵ | | | | | | |
| 50 | Trade | | | | | | |
| 51, 52, 55 | Wholesale Trade; Retail Trade – building materials and hardware, automotive, marine craft aircraft | | 50 | 50 | | <p>APZ I: Maximum FAR of 0.12 to 0.28, depending on land use.</p> <p>APZ II: Maximum FAR of 0.28 to 0.56, depending on land use.</p> <p>APZ I/II: For public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.</p> | |
| 53-54, 56-57, 59 | Retail trade - shopping centers, food, apparel, furniture and home furnishings, other retail trade | | | 50 | | <p>APZ II: Maximum FAR of 0.16 to 0.56, depending on land use; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.</p> | |
| 58 | Retail trade—eating and drinking establishments | | | | | | |
| 60 | Services | | | | | | |
| 61, 62, 63, 65, 67, 69 | Office: Finance, insurance, real estate; Services: Personal/professional/government; Research & Development | | | 50 | | <p>APZ II: Maximum FAR of 0.22 to 0.24 depending on land use; for new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.</p> | |
| 6242, 637, 64, 66 | Cemetery; Warehousing/storage (not including hazardous materials); Repair, including auto, electronics, furniture; Contract construction services | | 50 | 50 | | <p>APZ I: Maximum FAR of 0.11 to 1.0 depending on land use.</p> <p>APZ II: Maximum FAR of 0.22 to 2.0 depending on land use.</p> <p>APZ I/II: For public reception and office areas of new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.</p> | |

TABLE 5-9 (3 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY WITH APPLICATION OF AICUZ NOISE AND SAFETY COMPATIBILITY GUIDELINES

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|----------------------------|---|-----|-----------|-----------|---|---|
| 6379 | Warehousing/storage of hazardous materials | Red | | | Green | |
| 651, 6513, 6516 | Medical Services; Hospital; Congregate care/nursing/convalescent facility; Large residential care facility | Red | | | Yellow 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 68 | Day care; Nursery school; Elementary, middle/junior high, and high school; College/university | Red | | | Yellow 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 6911, 6994 | Indoor Public Assembly: Religious, fraternal | Red | | | Yellow 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 70 | Culture, Entertainment, and Recreation | | | | | |
| 71 | Library; Museum; Art gallery; Planetarium; Aquarium | Red | | | Yellow 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 723 | Indoor Entertainment Assembly: Auditorium, concert hall, theater | Red | | | Yellow 45 | Inside 65 dB CNEL: Interior noise must perform to 45 dB CNEL. |
| 721, 722 | Outdoor Assembly: Amphitheater, music shell; Spectator sports arena, stadium | Red | | | | |
| 7123, 7124, 741, 743, 744, | Outdoor Participant Sports: Golf course, tennis court, riding stable, water recreation; Botanical garden; Zoo | Red | Yellow | Green | | APZ I: Maximum FAR of 0.11. APZ II: Maximum FAR of 0.22. APZ I/II: No clubhouse, indoor meeting place, or auditorium. |
| 73 | Amusement park; Golf driving range; Go-cart track; Miniature golf course | Red | | Green | | |
| 742, 7414, 7415, 7417, 79 | Athletic club; Gym; Fitness facility; Bowling alley; Recreation center; Skating rink | Red | Yellow 50 | Yellow 50 | Green | APZ I: Maximum FAR of 0.11. APZ II: Maximum FAR of 0.22. APZ I/II: No clubhouse, indoor meeting place, or auditorium; for new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated. |
| 76 | Park | Red | Yellow | Green | | APZ I: Maximum FAR of 0.11. APZ II: Maximum FAR of 0.22. APZ I/II: No clubhouse, indoor meeting place, or auditorium. |
| 749, 752 | Campground | Red | | | Yellow 45 | Inside 65 dB CNEL: In new or reconstructed portions of buildings, interior noise must perform to 45 dB CNEL in sleeping areas. |

TABLE 5-9 (4 OF 4) STANDARDS FOR NOISE AND SAFETY COMPATIBILITY WITH APPLICATION OF AICUZ NOISE AND SAFETY COMPATIBILITY GUIDELINES

| SLUCM ² CODE | LAND USE TYPE ¹ | CZ | APZ I | APZ II | INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES | STANDARDS ⁴ |
|-------------------------|------------------------------------|----|-------|--------|---|---|
| 751 | Resort | | | 0 | 45 | Inside 65 dB CNEL: In new or reconstructed portions of buildings, interior noise must perform to 45 dB CNEL in sleeping areas. |
| 80 | Resource Production and Extraction | | | | | |
| 81-85, 89 | Agriculture, aquaculture, mining | | 45 | 45 | 45 | APZ I: Maximum FAR of 0.28. APZ II: Maximum FAR of 0.56. APZ I/II: No activity which attracts concentrations of birds, produces smoke or glare, or involves explosives. APZ I/II, inside 65 dB CNEL: For new or reconstructed portions of residential buildings, interior noise must perform to sound level indicated. |

KEY TO TABLE 5-9:

| | |
|--------|--|
| | Compatible land use. Not subject to any noise or safety standards |
| | Compatible land use if the indicated standards are met |
| | Incompatible land use |
| 45, 50 | Maximum interior sound level (in dB CNEL) from exterior noise sources with windows and doors closed. Interior sound level in new, reconstructed, or expanded portion of building, or in certain parts of building as described in the Standards columns, must perform to the level indicated. It is the responsibility of the project sponsor to demonstrate that the building, as designed, can achieve the interior sound level. This may be accomplished by the certification of an appropriately licensed design professional (engineer, architect, or acoustician with building design experience). The degree of acoustical treatment that is required will vary based on building design and the noise exposure level to which the building is exposed. |

NOTES TO TABLE 5-9:

- The reuse of any land use for an incompatible use per this table is inconsistent with this ALUCP.
- Standard Land Use Coding Manual, Urban Renewal Administration and Bureau of Public Roads, U.S. Department of Commerce, 1965. The SLUCM is a comprehensive land use classification system defined with a hierarchical set of codes. The most detailed level of classification uses 4 digits (say, 6911 for "churches, synagogues, and temples"), the next most detailed level uses three digits (691 for "religious activities"), a more generalized level uses two digits (69 for "miscellaneous services"), and the most generalized level uses one digit (6 for "services"). In this land use compatibility table, the generalized two-digit SLUCM codes have been used where possible. The standards applicable to each two-digit level of land uses apply to all of the more detailed land uses (using three-digit and four-digit codes) within the two-digit category, unless a more detailed SLUCM Code is used elsewhere in the table. For example, in the second row of the "Transportation, Communication and Utilities" category, SLUCM Codes 47 and 48 include communications and utilities land uses. In the third row, however, SLUCM Code 485, refuse disposal, is called out as a distinct land use for purposes of land use compatibility. Thus, SLUCM Code 48, in the second row, should be interpreted as including all uses described in the SLUCM under the "48 code," except for Code 485.
- Community Noise Equivalent Level
- Per ALUCP Section 5.1.6 Reconstruction of Existing Nonresidential Uses, gross floor area includes vested development.
- While refuse disposal and related uses are not noise-sensitive, they are considered incompatible within the 65 dB CNEL contour because of their tendency to attract birds, a potential hazard to flight. These uses are considered incompatible throughout the Airspace Protection Area, which includes all areas within the 65 dB CNEL contour. See ALUCP Section 5.2.5.6 Wildlife Attractants.

SOURCE: San Diego County Airport Land Use Commission. Adapted from Table C-1, Suggested Land Use Compatibility in Noise Zones, and Table C-2, Suggested Land Use Compatibility in Accident Zones, in the 2011 AICUZ (The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, pages C-1 - C-10.)

The AICUZ study says nothing about the need for the City of Coronado to promote the conversion of existing incompatible land uses to compatible land uses. In fact, the AICUZ study recognizes that the City of Coronado should focus on planning and development policies that would avoid worsening land use incompatibility. “[W]hen land is already developed the focus is often on redevelopment and infill. From this AICUZ study’s perspective, local governments should encourage fair disclosure to the public of the noise and APZ situation, and not take actions that would make an existing land use compatibility (or incompatibility) situation worse (for example by allowing increased densities in redevelopment of currently low-density incompatible land uses).”⁴⁰

Furthermore, state law does not invest ALUCs with the responsibility of planning for the conversion of existing incompatible land uses to compatible land uses. ALUCs are responsible for establishing land use compatibility planning policies for new development. As stated in the Public Utilities Code, “It is the purpose of this article to protect public health, safety, and welfare by ensuring ... the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.”⁴¹

While this alternative would meet the objectives of the proposed ALUCP, as stated in Section 5.3, it is difficult to envision how the City of Coronado could reasonably implement it. It would also result in greater environmental impacts than the proposed ALUCP. Thus, adoption of the AICUZ noise and safety compatibility guidelines fails as a reasonable alternative deserving further study – it is infeasible, and it would not avoid potentially significant environmental impacts.⁴²

5.8 SUMMARY OF ALTERNATIVES

Table 5-10 compares the alternatives, based on the environmental impacts attributable to each and the degree to which each alternative achieves the objectives of the proposed project.

As explained in Section 4.2.4.7, Impacts on Land Use and Planning – Summary and Conclusions, only the potential impacts limiting the expansion of hotel/resort floor area are considered significant. The other impacts are considered less than significant either because of the small amount of land involved relative to similarly zoned land outside the safety zones or because of the scarcity of the land uses that could be affected by the reduced availability of land to accommodate their future development.⁴³

- **Alternative 1, No Project.** This Alternative would avoid all environmental impacts but would fail to achieve most objectives of the proposed ALUCP, partially achieving only Objective 4. It would also fail in meeting the legal requirements that the ALUCP be consistent with the noise and safety standards of the AICUZ⁴⁴ and that the ALUC adopt an ALUCP for NASNI.⁴⁵
- **Alternative 2, Elimination of Limits on Increases in Density and Intensity in Safety Zones.** This Alternative would reduce environmental impacts by allowing the potential development of 36 new residential units and the

⁴⁰ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, p. 7-3.

⁴¹ California Public Utilities Code § 21670(a)(2).

⁴² California Code of Regulations, Title 14, § 15126.6(c).

⁴³ These include various incompatible institutional and public service uses.

⁴⁴ California Public Utilities Code § 21675(b).

⁴⁵ California Public Utilities Code § 21670.3, § 21675.

expansion of nonresidential floor area within the safety zones. By enabling this potential development, however, Alternative 2 would fail to achieve Objective 1(a), limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility; Objective 2(a), limiting new risk-sensitive land uses within safety zones; and Objective 2(b), avoiding an increase in existing land use incompatibility within the safety zones. A serious shortcoming of this Alternative relates to the maximum development intensity permitted in the H-M – Hotel-Motel zoning district – a maximum floor area ratio (FAR) of 1.8. The proposed floor area of the Hotel del Coronado, after implementation of the 2011 Amended Master Plan is 0.78. Substantial obstacles limit the site from being developed to the maximum intensity allowed by zoning as long as the historic hotel buildings are preserved. If, however, the property is ever completely redeveloped, the existing zoning would allow development to a much greater intensity than would otherwise be possible. Implementation of Alternative 2 would remove any safeguards against this eventuality. Significantly, Alternative 2 would fail in meeting the legal requirement that the ALUCP be consistent with the noise and safety standards of the AICUZ.⁴⁶ In failing to be consistent with the AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.⁴⁷

- **Alternative 3, Application of ALUCP Noise and Safety Standards Only to Parcels Sited Completely Inside Noise Contours or Safety Zones.** This Alternative has fewer environmental impacts than the proposed ALUCP and more than Alternative 2. By essentially reducing the area within the 65 dB CNEL contour and the safety zones, it would fail to achieve Objective 1(a), limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility; Objective 1(b), ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards; Objective 2(a), limiting new risk-sensitive land uses within safety zones; and Objective 2(b), avoiding an increase in existing land use incompatibility within the safety zones. As with Alternative 2, a serious shortcoming of this Alternative relates to the effective removal of the Hotel del Coronado property from the safety zones (APZ I and APZ II). Implementation of Alternative 3 would remove any safeguards against the risk, however slight, of substantial increases in development density on this property in the future. Significantly, Alternative 3 would fail in meeting the legal requirement that the ALUCP be consistent with the noise and safety standards of the AICUZ.⁴⁸ In failing to be consistent with the AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.⁴⁹

⁴⁶ California Public Utilities Code § 21675(b).

⁴⁷ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

⁴⁸ California Public Utilities Code § 21675(b).

⁴⁹ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

TABLE 5-10 (1 OF 4) SUMMARY OF PROPOSED ALUCP AND ALTERNATIVES – IMPACTS AND ACHIEVEMENT OF PROJECT OBJECTIVES

| MEASURES OF IMPACT & PROJECT OBJECTIVES | PROPOSED ALUCP | ALTERNATIVES | | |
|---|-----------------|----------------|--|--|
| | | 1 – NO PROJECT | 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES | 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES |
| Potential Impacts | | | | |
| Potential Future Residential Displacement (dwelling units) | 36 | 0 | 0 | 34 |
| Potential Displacement of Expanded Commercial Floor Area (square feet) | 3,850 to 25,550 | 0 | 0 | 0 |
| Potential Displacement of Expanded Hotel/Resort Floor Area (square feet) | 38,023 | 0 | 0 | 0 |
| Maximum Land Area Rendered Unavailable for Incompatible Nonresidential Use (square feet) | 445,714 | 0 | 445,714 | 414,263 |
| Maximum Existing Floor Area Rendered Unavailable for Incompatible Nonresidential Use (square feet) | 23,759 | 0 | 23,759 | 20,479 |
| Achievement of Project Objectives | | | | |
| 1. Promote the compatibility of land uses within noise contours by: | | | | |
| a) Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility | Yes | No | No. While Alternative 2 would limit development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), the potential development of up to 36 new residential units in those areas would be possible. By failing to limit the increase in land use incompatibility, this Alternative would also conflict with the AICUZ and PUC § 21674.7. | No. While implementation of Alternative 3 would limit the development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), an additional 2 multiple-family residential units could be developed in those areas compared with the proposed ALUCP. By failing to limit the increase in land use incompatibility, this Alternative would also conflict with the AICUZ and PUC § 21674.7. |

TABLE 5-10 (2 OF 4) SUMMARY OF PROPOSED ALUCP AND ALTERNATIVES – IMPACTS AND ACHIEVEMENT OF PROJECT OBJECTIVES

| MEASURES OF IMPACT & PROJECT OBJECTIVES | PROPOSED ALUCP | ALTERNATIVES | | |
|---|----------------|----------------|---|--|
| | | 1 – NO PROJECT | 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES | 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES |
| b) Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards | Yes | No | Yes | No. By effectively removing approximately 14 residential-zoned lots from within the 65 dB CNEL contour, Alternative 3 would increase the number of noise-sensitive land uses that could be expanded without being treated to reduce interior sound levels per the proposed ALUCP. ¹ This Alternative also implicitly reduces the size of the AICUZ noise contours by removing split parcels from the need to comply with standards of the higher noise contour range. This makes this Alternative inconsistent with the standards of the AICUZ and PUC § 21674.7. |
| 2. Protect public safety by: | | | | |
| a) Limiting new risk-sensitive land uses within safety zones | Yes | No | No. By allowing residential development up to the maximum permitted by current zoning, up to 36 new dwelling units could be built in the safety zones. By failing to limit the increase in land use incompatibility, this Alternative would also conflict with the AICUZ and PUC § 21674.7. | No. By effectively reducing the number of properties in the safety zones, Alternative 3 would increase the number of risk-sensitive land uses that could potentially be developed within the safety zones. Two additional multiple-family residential units could potentially be developed, and an additional 3,280 square feet of leasable area in existing buildings and 31,451 square feet of land area would become available for the development of new risk-sensitive land uses. This Alternative also implicitly reduces the size of the safety zones by removing split parcels from the need to comply with standards of the more restrictive safety zone. This makes this Alternative inconsistent with the standards of the AICUZ and PUC § 21674.7. |

TABLE 5-10 (3 OF 4) SUMMARY OF PROPOSED ALUCP AND ALTERNATIVES – IMPACTS AND ACHIEVEMENT OF PROJECT OBJECTIVES

| MEASURES OF IMPACT & PROJECT OBJECTIVES | PROPOSED ALUCP | ALTERNATIVES | | |
|--|----------------|--|--|---|
| | | 1 – NO PROJECT | 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES | 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES |
| a) Avoiding an increase in existing land use incompatibility within the safety zones | Yes | No | No. While Alternative 2 would limit development of new incompatible nonresidential land uses, the potential development of up to 36 residential units and new dwellings and the 41,873 to 63,573 square feet of nonresidential development expansion in those areas would be possible. Also, given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development is possible. By failing to limit the increase in land use incompatibility, this Alternative would also conflict with the AICUZ and PUC § 21674.7. | No. By effectively reducing the number of properties in the safety zones, Alternative 3 would increase the number of properties where existing incompatible development could be expanded. An additional 2 new multiple-family residential units and 41,873 to 63,573 square feet of nonresidential development expansion could occur. Given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development would occur with this Alternative. This Alternative also implicitly reduces the size of the safety zones by removing split parcels from the need to comply with standards of the more restrictive safety zone. This makes this Alternative inconsistent with the standards of the AICUZ and PUC § 21674.7. |
| 3. Protect NASNI airspace and the safety of flight by: | | | | |
| a) Limiting the height of new structures and objects within the airspace protection boundary per FAA standards | Yes | No. While the Federal Part 77 regulations and state law enforcing FAA airspace determinations ⁵⁰ would remain in effect, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Thus, compliance with the Federal regulations in the airspace protection area is less than complete. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process in their project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review | Yes | Yes |

⁵⁰ California Public Utilities Code, §§ 21657, 21659(b).

TABLE 5-10 (4 OF 4) SUMMARY OF PROPOSED ALUCP AND ALTERNATIVES – IMPACTS AND ACHIEVEMENT OF PROJECT OBJECTIVES

| MEASURES OF IMPACT & PROJECT OBJECTIVES | PROPOSED ALUCP | ALTERNATIVES | | |
|---|----------------|--|---|--|
| | | 1 – NO PROJECT | 2 – ELIMINATION OF LIMITS ON INCREASES IN DENSITY AND INTENSITY IN SAFETY ZONES | 3 – APPLICATION OF ALUCP NOISE AND SAFETY STANDARDS ONLY TO PARCELS SITED COMPLETELY INSIDE NOISE CONTOURS OR SAFETY ZONES |
| b) Limiting potential hazards to flight within the airspace protection boundary | Yes | No. As noted above, while the Federal Part 77 regulations and state law enforcing FAA airspace determinations ⁵¹ would remain in effect, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process in their project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review. In addition, other potential hazards to flight would be less likely to be identified and avoided. | Yes | Yes |
| 4. Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA | Yes | Partially. Without the AIA established in the proposed ALUCP, the buyer awareness measures of the state real estate law would apply to a much smaller area (within two statute miles of NASNI) and within other small areas covered by the AIAs of other airports. | Yes | Yes |

SOURCE: Ricondo & Associates, Inc., November 2019.

⁵¹ California Public Utilities Code, §§ 21657, 21659(b).

5.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The CEQA Guidelines require that the “environmentally superior” alternative be discussed in the EIR.⁵² This is the alternative that would cause the least environmental impact.

Alternative 1, No Project, is the alternative resulting in the least environmental impact. Alternative 1, however, would fail to fully achieve all of the project objectives. It also conflicts with the statutory mandate of the ALUC to adopt an ALUCP for NASNI.⁵³ Alternative 1, therefore, is unsuitable for implementation.

The CEQA Guidelines state that, “[i]f the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”⁵⁴ Alternative 2, Elimination of Limits on Increases in Density and Intensity in Safety Zones, is the next best alternative, in terms of environmental impact. This Alternative would eliminate the displacement of any potential housing development and nonresidential development expansion from the safety zones. As discussed in Section 5.5.2, however, the elimination of those impacts would result in the failure of Alternative 2 to achieve Objectives 1(a), 2(a), and 2(b).⁵⁵ By allowing development up to the maximum density and intensity permitted by current zoning, implementation of Alternative 2 would enable up to 36 new dwelling units and 41,873 to 63,573 square feet of nonresidential development expansion within the safety zones. A serious shortcoming of Alternative 2 relates to the maximum development intensity permitted in the H-M – Hotel-Motel zoning district. Current zoning allows a maximum FAR of 1.8.⁵⁶ The proposed FAR of the Hotel del Coronado, after implementation of the 2011 Amended Master Plan, is 0.78. If the Hotel del Coronado property was ever completely redeveloped, the existing zoning would allow development to a much greater intensity than provided for in the 2011 Amended Master Plan. Implementation of Alternative 2 would remove any safeguards against this eventuality.

Importantly, Alternative 2 would conflict with the AICUZ recommendation that local agencies “not take actions that would make an existing land use compatibility (or incompatibility) situation worse (for example by allowing increased densities in redevelopment of currently low density incompatible land uses).”⁵⁷ This condition would cause Alternative 2 to fail in meeting the legal requirement that the ALUCP be consistent with the noise and safety standards of the AICUZ.⁵⁸ In failing to be consistent with the AICUZ, this alternative would also fail to comply with the Public Utilities Code section requiring that the ALUC be guided by the Caltrans Handbook in preparing its ALUCP.⁵⁹

⁵² Association of Environmental Professionals, *2019 California Environmental Quality Act (CEQA) Statute and Guidelines*, § 15126.6(e)(2), p. 197.

⁵³ California Public Utilities Code, §§ 21675(a) and (b).

⁵⁴ Association of Environmental Professionals, *2019 California Environmental Quality Act (CEQA) Statute and Guidelines*, § 15126.6(e)(2), p. 197.

⁵⁵ Objective 1(a): Promote the noise compatibility of land uses within noise contours by limiting new noise-sensitive development within the 65 decibel (dB) Community Noise Equivalent Level (CNEL).

Objective 2(a): Protect public safety by limiting new risk-sensitive land uses within safety zones.

Objective 2(b): Protect public safety by avoiding an increase in existing land use incompatibility within the safety zones.

⁵⁶ FAR is the ratio of building floor area to lot area.

⁵⁷ The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, p. 7-3.

⁵⁸ California Public Utilities Code § 21675(b).

⁵⁹ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48.

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6. PREPARERS AND ORGANIZATIONS AND PERSONS CONSULTED

6.1 PREPARERS

Ricondo & Associates, Inc.

1917 Palomar Oaks Way, Suite 350
 Carlsbad, CA 92008

Stephen D. Culberson, Vice President

Francois T. Bijotat, Director

Patrick M. Hickman, AICP, ASLA, LEED-AP, Senior Consultant (no longer with the firm)

Mark R. Johnson, AICP, Director

Arya J. Moalemi, Senior Consultant

Kate E. Doughty, Consultant

San Diego County Regional Airport Authority

P.O. Box 82776
 San Diego, CA 92138-2776

Amy Gonzalez, General Counsel, Counsel Services

Ralph Redman, ENV SP, Manager, Airport Planning

Kim Sheredy, AICP, Senior Airport Planner

Ed Gowens, Senior Airport Planner

Garret Hollarn, Senior Airport Planner

Lori D. Ballance, Gatzke Dillon & Ballance LLP, Outside ALUC Counsel

6.2 ORGANIZATIONS AND PERSONS SENT NOTICE OF PREPARATION AND/OR CONSULTED

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|--|---------------------------|---|
| American Institute of Architects San Diego | NASNI ALUCP Working Group | John Ziebarth |
| Barrio Logan Planning Group | | Mark Steele, Chair |
| California Coastal Commission | | |
| California Department of Transportation, District 11 | | Cory Binns, Director |
| California Department of Transportation, Division of Aeronautics | | Bob Fiore, Associate Transportation Planner |

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|--|---------------------------|--|
| Chula Vista General Elementary School District | | Francisco Escobedo, Superintendent |
| City of Chula Vista | | The Honorable Mary Casillas Salas, Mayor |
| City of Chula Vista | NASNI ALUCP Working Group | Scott Donaghe, Principal Planner |
| City of Chula Vista | NASNI ALUCP Working Group | Michael Walker, Senior Planner |
| City of Chula Vista | | Kelly Broughton, Planning Director |
| City of Coronado | | The Honorable Richard Bailey, Mayor |
| City of Coronado | NASNI ALUCP Working Group | Jesse Brown, Senior Planner |
| City of Coronado | | Richard Grunow, Director, Community Development, Redevelopment Services, and Housing |
| City of Coronado | NASNI ALUCP Working Group | Blair King, City Manager |
| City of Coronado, City Council | | The Honorable Whitney Benzian, Councilmember |
| City of Coronado, City Council | | The Honorable Mike Donovan, Councilmember |
| City of Coronado, City Council | NASNI ALUCP Working Group | The Honorable Carrie Downey, Councilmember |
| City of Coronado, City Council | | The Honorable Marvin Heinze, Councilmember |
| City of Coronado, City Council | NASNI ALUCP Working Group | The Honorable Bill Sandke, Councilmember |
| City of Coronado Extension of Staff | NASNI ALUCP Working Group | Leslea Meyerhoff, Summit Environmental Group |
| City of Coronado, Legal Counsel | | Margaret Sohagi |
| City of Imperial Beach | | The Honorable Serge Dedina, Mayor |
| City of Imperial Beach | | Tyler Foltz, AICP, Assistant Director of Community Development |
| City of Imperial Beach | NASNI ALUCP Working Group | Jim Nakagawa, City Planner |
| City of Imperial Beach, City Council | | The Honorable Mark West, Councilmember |
| City of National City | NASNI ALUCP Working Group | Raymond Pe, Director, Planning |
| City of National City | | The Honorable Alejandra Sotelo-Solis, Mayor |
| City of San Diego | | The Honorable Kevin Faulconer, Mayor |
| City of San Diego | | Alex Frost, Senior Planner |
| City of San Diego | | Tait Galloway, Program Manager, Community Planning and Implementation |
| City of San Diego | | Mike Hansen, Director, Planning |
| City of San Diego | | Elyse Lowe, Director, Development Services |
| City of San Diego | NASNI ALUCP Working Group | Vickie White, Senior Planner |
| City of San Diego, City Council, District 2 | | The Honorable Jennifer Campbell, Councilmember, District 2 |
| City of San Diego, City Council, District 2, Office of Councilmember Jennifer Campbell | | Josh Coyne, Policy Advisor |
| City of San Diego, City Council, District 2, Office of Councilmember Jennifer Campbell | | Venus Molina, Chief of Staff |
| City of San Diego, City Council, District 3 | | The Honorable Chris Ward, Councilmember, District 3 |
| City of San Diego, City Council, District 3, Office of Councilmember Chris Ward | | Molly Chase, Chief of Staff |
| City of San Diego, City Council, District 7 | | The Honorable Scott Sherman, Councilmember, District 7 |

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|---|---------------------------|---|
| City of San Diego, City Council, District 7, Office of Councilmember Scott Sherman | NASNI ALUCP Working Group | Barrett Tetlow, Chief of Staff |
| City of San Diego, City Council, District 8 | | The Honorable Vivian Moreno, Councilmember, District 8 |
| City of San Diego, City Council, District 8, Office of Councilmember Vivian Moreno | | Travis Knowles, Chief of Staff |
| City of San Diego, Office of Mayor Kevin L. Faulconer | | Aimee Faucett, Chief of Staff |
| City of San Diego, Office of Mayor Kevin L. Faulconer | | Adrian Granada, Public Policy Manager |
| Civic San Diego | | Brad Richter, Deputy Director, Urban Division |
| Clairemont Community Planning Group | | Naveen Waney, Chair |
| Commercial Property Owner, APZ 1 | NASNI ALUCP Working Group | Mike Doemeny |
| Community Planners Committee | | David Moty, Chair |
| Coronado Chamber of Commerce | NASNI ALUCP Working Group | Sue Gillingham |
| Coronado Historical Association | NASNI ALUCP Working Group | Carrie O'Brien |
| Coronado MainStreet | NASNI ALUCP Working Group | Rita Sarich |
| Coronado Real Estate Association | NASNI ALUCP Working Group | Zach Todaro |
| Coronado Tourism Improvement District | NASNI ALUCP Working Group | Todd Little, Executive Director |
| Coronado Unified School District Board | NASNI ALUCP Working Group | Lou Smith |
| Coronado Unified School District | | Karl Mueller, Superintendent |
| County of San Diego | | Mark Wardlaw, Director, Planning |
| County of San Diego, Board of Supervisors, District 1 | | The Honorable Greg Cox, Supervisor, District 1 |
| County of San Diego, Board of Supervisors, District 1, Office of Supervisor Greg Cox | | Victor Avina, Policy Advisor |
| County of San Diego, Board of Supervisors, District 2 | | The Honorable Dianne Jacob, Supervisor, District 2 |
| County of San Diego, Board of Supervisors, District 2, Office of Supervisor Dianne Jacob | | Jeff Collins, Chief of Staff |
| County of San Diego, Board of Supervisors, District 4 | | The Honorable Nathan Fletcher, Supervisor, District 4 |
| County of San Diego, Board of Supervisors, District 4, Office of Supervisor Nathan Fletcher | | Paul Worlie, Chief of Staff |
| County of San Diego, Planning and Development Services, Advance Planning Division | NASNI ALUCP Working Group | Nick Koutoufidis, Group Program Manager |
| County of San Diego, Planning and Development Services, Advance Planning Division | | Eric Lardy, Chief |
| Downtown Community Planning Council | | Pat Stark |
| Greater Golden Hill Planning Committee | | David Swarens, Chair |
| Grossmont Union High School District | | Dr. Tim Glover, Superintendent |
| Grossmont-Cuyamaca Community College District | | Dr. Cindy Miles, Chancellor |
| Hotel del Coronado | NASNI ALUCP Working Group | Bill Dodds |
| Hotel del Coronado | NASNI ALUCP Working Group | David Watson |
| Hotel del Coronado Architect | NASNI ALUCP Working Group | Kathy Breedlove |
| Individual | | Susan Anderson |
| Individual | | Linda Austin |

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|----------------------------|---------------|---|
| Individual | | Felicia Bell |
| Individual | | Brent Bennitt |
| Individual | | Jim Besikof |
| Individual | | Dennis Buckovetz |
| Individual | | Liza Butler |
| Individual | | Paula Couture |
| Individual | | Eric Dawson |
| Individual | | Harlan M Durgin |
| Individual | | Carolyn Elledge |
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| Individual | | Jerry Griffith |
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| Individual | | Leslea Harvey |
| Individual | | Linda Heath |
| Individual | | Lauren Hendrickson |
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| Individual | | Martha Jordan |
| Individual | | Ed Lohlein |
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| Individual | | Ann Marie McGregor |
| Individual | | Lou Milioti |
| Individual | | Harold Nevin |
| Individual | | J O'Leary |
| Individual | | Marion Phelps |
| Individual | | N Rich |
| Individual | | Margaret Richardson |
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| Individual | | R Scofield |
| Individual | | Sondra Seeright |
| Individual | | John Sexton |
| Individual | | Al Sorensen |
| Individual | | Bob Spear |
| Individual | | Richard Spehn |
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| Individual | | Zachary Thornton |
| Individual | | Gloria Tierny |
| Individual | | Art Van Rooy |
| Individual | | Duane Weekly |
| Individual | | Sue Weekly |
| Individual | | Claudia Libensow |
| Individual | | Al Ovrom |
| Linda Vista Planning Group | | Noli Zosa, Chairman |
| Little Italy Association | | Marco LiMandri, Chief Executive Administrator |

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|---|---------------------------|---|
| Metropolitan Water District | | Jeffrey Kightlinger, General Manager |
| Midway-Pacific Highway Community Planning Group | | Cathy Kenton, Chairperson |
| Mission Valley Planning Group | | Jonathan P. Frankel, Chair |
| National General Elementary School District | | Leighangela Brady, Superintendent |
| Naval Air Station North Island | NASNI ALUCP Working Group | Anna Shepherd, Community Plans Liaison |
| Naval Base Coronado | | Jason Golumbskie-Jones, Environmental Director |
| Naval Base Coronado | | Captain Gary Mayes, Commanding Officer |
| Ocean Beach Planning Board | | Andrea Schlageter, Chair |
| Office of U.S. Senator Dianne Feinstein | | Senator Dianne Feinstein, Senator |
| Office of U.S. Senator Dianne Feinstein | | Bill Kratz |
| Office of U.S. Senator Kamala Harris | | Senator Kamala Harris, Senator |
| Office of U.S. Senator Kamala Harris | | Serena Hendle |
| Old Town Community Planning Committee | | Ann Dahlkamp, Chair |
| Peninsula Planning Board | | Robert Goldyn, Chair |
| Property Owner, APZ I | NASNI ALUCP Working Group | Peter Huntsman |
| Property Owner, APZ I | NASNI ALUCP Working Group | Tom Smisek |
| Property Owner, APZ I | NASNI ALUCP Working Group | Jim Zortman |
| Property Owner, APZ II | NASNI ALUCP Working Group | Jim Scanlon |
| Property Owner, Clear Zone | NASNI ALUCP Working Group | John Julius |
| Property Owner, Clear Zone | NASNI ALUCP Working Group | John O'Brien |
| Property Owner, Clear Zone | NASNI ALUCP Working Group | Angela Yates |
| Property Owner, Coronado Cays | NASNI ALUCP Working Group | Bob Dilworth |
| San Diego Community College District | | Dr. Constance Carroll, Chancellor |
| San Diego County Flood Control District | | Sara Agahi, Flood Control District Manager |
| San Diego Unified Port District | NASNI ALUCP Working Group | Jason Giffen, Assistant Vice President, Planning and Green Port |
| San Diego Unified Port District | NASNI ALUCP Working Group | Lesley Nishihira, Director of Planning |
| San Diego Unified Port District | | Lily Tsukayama, Assistant Planner |
| San Diego Unified Port District, Board of Port Commissioners | NASNI ALUCP Working Group | Garry Bonelli, Chairman |
| San Diego Unified School District | | Cindy Marten, Superintendent |
| SANDAG | | Hasan Ikhrata, Executive Director |
| Southeastern San Diego Planning Group | | Steve Veach, Chair |
| Southwestern Community College District | | Roberto Alcantar, Governing Board President |
| State of California, District 39, Office of Senator Toni Atkins | | Deanna Spehn |
| State of California, District 39, Office of Senator Toni Atkins | | |
| State of California, District 40, Office of Senator Ben Hueso | | |
| State of California, District 71, Office of Assemblymember Randy Voepel | | |
| State of California, District 78, Office of Assemblymember Todd Gloria | | Stephen Hill |
| State of California, District 78, Office of Assemblymember Todd Gloria | | Amy Sandoval |

| ORGANIZATION/AFFILIATION | WORKING GROUP | CONTACT PERSON |
|--|---------------------------|---|
| State of California, District 78, Office of Assemblymember Todd Gloria | | |
| State of California, District 79, Office of Assemblymember Dr. Shirley Weber | | |
| State of California, District 80, Office of Assemblymember Lorena Gonzalez | | |
| State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit | | Scott Morgan, Director |
| State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit | | |
| State of California, Native American Heritage Commission, Cultural and Environmental Department | | Steven Quinn, Associate Governmental Program Analyst |
| Sweetwater Union High School District | | Dr. Karen Janney, Superintendent |
| United States Navy | NASNI ALUCP Working Group | Roland Biehle |
| United States, District 50, Office of Representative Duncan Hunter | | |
| United States, District 51, Office of Representative Juan Vargas | | |
| United States, District 52, Office of Representative Scott Peters | | |
| United States, District 53, Office of Representative Susan Davis | | |
| University of California | | Office of the Secretary and Chief of Staff to the Regents |
| Uptown Planners | | Leo Wilson, Chair |
| Viejas Tribal Government | | Ray Teran, Resource Management |

7. REFERENCES AND ACROYNMS

7.1 REFERENCES

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7.3 ACRONYMS AND ABBREVIATIONS

| | |
|----------|---|
| AIA | Airport Influence Area |
| AICUZ | Air Installations Compatible Use Zones |
| ALUC | Airport Land Use Commission |
| ALUCP | Airport Land Use Compatibility Plan |
| APZ | Accident Potential Zone |
| BID | Business Improvement District |
| Caltrans | California Department of Transportation |
| CEQA | California Environmental Quality Act |
| CFR | Code of Federal Regulations |
| CNEL | Community Noise Equivalent Level |
| CPA | Community Planning Area |
| CTID | Coronado Tourism Improvement District |
| CZ | Clear Zone |
| dB | Decibel |
| DEIR | Draft Environmental Impact Report |
| DU | Dwelling Unit |
| EA | Environmental Assessment |
| EIR | Environmental Impact Report |
| FAA | Federal Aviation Administration |
| FAR | Floor Area Ratio |
| FEMA | Federal Emergency Management Agency |
| FIRM | Flood Insurance Rate Map |
| FIS | Flood Insurance Study |
| GFA | Gross Floor Area |
| HCD | Housing and Community Development |
| IS | Initial Study |
| K-12 | Kindergarten through 12th Grade |

| | |
|-----------|--|
| LCP | Local Coastal Program |
| MAD | Maintenance Assessment District |
| MSL | Mean Sea Level |
| NADEP | Naval Aviation Depot |
| NAS | Naval Air Station |
| NASNI | Naval Air Station North Island |
| NAVFAC SW | Naval Facilities Command Southwest |
| NFIP | National Flood Insurance Program |
| NOLF IB | Naval Outlying Landing Field Imperial Beach |
| NOP | Notice of Preparation |
| NTC | U.S. Naval Training Center |
| OACSP | Orange Avenue Corridor Specific Plan |
| OE/AAA | Obstruction Evaluation / Airport Airspace Analysis |
| PAR | Precision Approach Radar |
| PMP | Port Master Plan |
| RHNA | Regional Housing Needs Assessment |
| RSIP | Residential Improvement Standards Program |
| SANDAG | San Diego Association of Governments |
| SB | Senate Bill (State of California) |
| SDCRAA | San Diego County Regional Airport Authority |
| SDCWA | San Diego County Water Authority |
| SDIA | San Diego International Airport |
| SLR | Sea Level Rise |
| SLUCM | Standard Land Use Coding Manual |
| SOCAL | Southern California (as part of SOCAL Range Complex) |
| Sq Ft | Square Feet |
| SW | Southwest |

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