REVISED NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE EAST HARBOR ISLAND REDEVELOPMENT/TOPGOLF PROJECT AND PORT MASTER PLAN AMENDMENT

EXTENDED PUBLIC REVIEW. PLEASE RESUBMIT COMMENTS.

PROJECT TITLE: East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment

APPLICANT: Topgolf, USA; Avis Rent A Car System, LLC; Enterprise Mobility; The Hertz Corporation; and the San Diego Unified Port District

LOCATION: The Project area consists of approximately 43 acres of land generally bounded to the north by North Harbor Drive and the San Diego International Airport, to the west by Harbor Island Drive, to the south by Liberator Way and the East Basin portion of San Diego Bay, and to the east by the Convair Lagoon portion of San Diego Bay.

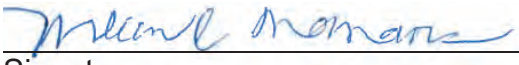
REFERENCE: California Code of Regulations, Title 14, Sections 15082(a), 15103, 15375

DATE: December 15, 2023

The San Diego Unified Port District (District) will be the lead agency in preparing an Environmental Impact Report (EIR) for the proposed East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment (Project). The District is soliciting input and feedback from various agencies, stakeholders, and the public pertaining to the scope and content of the environmental information that will be included in the EIR. For agencies with jurisdiction over affected resources or approval authority for the Project, the District seeks information that is relevant to your statutory responsibilities in connection with this Project. An agency may need to use the Project's EIR when considering permits or other approvals for the Project. The Project description, location, and its possible environmental effects are contained in the attached materials.

Due to the time limits mandated by state law, comments must be sent at the earliest possible date but no later than 30 days after the issuance of this notice. **The comment period has been extended for an additional minimum of 30 days. Comments previously submitted via email should be resubmitted. Comments regarding environmental concerns will be accepted until 5:00 p.m. on January 16, 2024,** via mail to San Diego Unified Port District, Development Services Department, Attn: Megan Hamilton, Senior Planner, 3165 Pacific Highway, San Diego, California 92101, or email to EHITopgolf@portofsandiego.org.

For questions regarding this Revised Notice of Preparation, please contact the Development Services Department at (619) 686-6419.



December 15, 2023

Signature

Date

Wileen C. Manaois

Director, Development Services Department

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

REVISED NOTICE OF PREPARATION
of a
DRAFT ENVIRONMENTAL IMPACT REPORT
for the
EAST HARBOR ISLAND REDEVELOPMENT/TOPGOLF PROJECT
and
PORT MASTER PLAN AMENDMENT
(UPD #EIR 2023-134)

Publication of this Notice of Preparation (NOP) initiates the San Diego Unified Port District's (District's) compliance with the California Environmental Quality Act (CEQA) for the proposed East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment (Project). The NOP is the first step in the Environmental Impact Report (EIR) process. It describes the Project and is distributed to responsible agencies, trustee agencies, cooperating federal agencies, and the general public. As stated in CEQA Guidelines (Guidelines), Section 15375, the purpose of the NOP is "to solicit guidance from those agencies as to the scope and content of the environmental information to be included in the EIR." The District is the CEQA lead agency, and Topgolf, USA (Topgolf); Avis Rent A Car System, LLC (Avis); Enterprise Mobility (Enterprise); The Hertz Corporation (Hertz); and the District are the applicants/proponents.

The NOP provides information describing the Project, its location, and its probable environmental effects to those who may wish to comment regarding the scope and content of the information to be included in the Draft EIR. The District encourages responsible and trustee agencies, the California Office of Planning and Research, interested parties, and the general public to provide their comments to the District so that the District can ensure that the Draft EIR meets their needs. The District has also prepared a Draft Initial Study for the Project, which is attached to this NOP.

Project Location

The Project area is approximately 43 acres of land generally bounded to the north by North Harbor Drive and the San Diego International Airport, to the west by Harbor Island Drive, to the south by Liberator Way and the East Basin portion of San Diego Bay, and to

the east by the Convair Lagoon portion of San Diego Bay (Figure 1, Regional Location, and Figure 2, Project Area). A portion of the Project area is planned for redevelopment (East Harbor Island redevelopment area).

Existing Conditions

The Project area is currently occupied by the San Diego Harbor Police headquarters; Avis, Enterprise, and Hertz rental car companies; and San Diego International Airport. Existing structures include several one- and two-story buildings, various shade structures, parking lots, fencing, and walkway pavement. Much of the Project area shoreline is covered with riprap. Topographically, the East Harbor Island redevelopment area is relatively level with a gentle gradient down to San Diego Bay.

Land Use

The Project is within the East Harbor Island Subdistrict of Planning District 2 of the Port Master Plan (PMP). The majority of the existing land use designation is Industrial Business Park, which permits a range of industrial and business uses sited in developments that emphasize clustering of buildings, extensive landscaping, and shared open space. There is also a small amount of Open Space and Harbor Services land use designations.

Project Description Summary

The Project proposes to redevelop portions of East Harbor Island. Project components include a PMP Amendment (PMPA), demolition and removal of existing structures and improvements, realignment of Liberator Way, the redevelopment of approximately 10 acres for the Topgolf entertainment complex, public realm improvements, and future redevelopment of adjacent parcels. The existing San Diego Harbor Police headquarters located on the western side of East Harbor Island would remain in place. Refer to Figure 2.

Demolition

The Project would include the demolition of three rental car facilities: Hertz, Enterprise, and Avis. Specifically, demolition of the approximate 12.2-acre Hertz facility at 3202 North Harbor Drive would include the removal of all buildings and canopies, an aboveground storage tank, two aboveground oil tanks, three underground fuel storage tanks, associated fuel piping and dispensers, paving surfaces, and all associated structural components. Demolition of the approximate 7.1-acre Enterprise facility, located at 3280 North Harbor Drive, would include the removal of the customer service maintenance building; fleet fueling canopy, including all structures, equipment, facilities, and utility lines serving the fuel/wash building; and underground fuel storage tanks and related piping. Demolition of the approximate 8.8-acre Avis facility located at 3180 North Harbor Drive

would include the complete removal of an existing storage building, a maintenance building, a security kiosk, an office building and associated canopy, fuel dispensers and related equipment, aboveground storage tanks, paving surfaces, and all associated structural components.

Liberator Way Realignment

The realignment of Liberator Way would accommodate both vehicular and pedestrian traffic. The newly realigned street would include a 66-foot right-of-way with a 40-foot street width, including space for parallel parking on either side of the roadway, and 8 feet of sidewalk on the northern side of the street. A minimum 9-foot parkway would be established on both sides of the bike/sidewalk, separating the roadway from the sidewalk, and would include drought-tolerant, enhanced landscaping and street trees. The streetscape would include street lighting, crosswalks at Liberator Way and Harbor Island Drive, benches, and trash receptacles.

Topgolf Entertainment Complex

Topgolf proposes to redevelop approximately 10 acres of the East Harbor Island redevelopment area (Topgolf Project) with a 70,700-gross-square-foot visitor-serving attraction with associated restaurant and retail uses. The proposed three-level building has a maximum height of approximately 50 feet. The building would include 102 hitting bays, which would face east toward a 4.5-acre artificial turf outfield enclosed by a polyester barrier netting system suspended on poles that would range between 90 and 170 feet in height. Patrons would hit golf balls from the hitting bays toward 10 lighted target areas in the outfield area. Hitting bays would include high-top and lounge seating with television screens and include overhead speakers providing amplified music. The complex would also include a full-service restaurant, a bar, lounges, a rooftop entertainment area including a sky patio, a corporate/event meeting space, and a family entertainment area with games.

Vehicular access to the Topgolf entertainment complex from the east would be off North Harbor Drive via Liberator Way and from the west off Harbor Island Drive via Liberator Way. Pedestrians would access the Topgolf entertainment complex via a 60-foot-wide walkway connecting an existing multi-use pathway adjacent to North Harbor Drive and a proposed sidewalk adjacent to Liberator Way. The parking lot would include approximately 293 parking stalls, including Americans with Disabilities Act parking stalls and electric vehicle stalls. Overflow parking would be made available to Topgolf through future development of the adjacent parcels.

Public Realm Improvements

Public realm improvements are proposed on approximately 10.8 acres as contemplated in the Draft Port Master Plan Update (PMPU). The park/plaza area could include a 15- to 20-foot-wide waterside promenade, a step-down area, a water-based hand launched, non-motorized watercraft launch area, a water-based transfer point, and other health and wellness features. Landscaping would integrate drought-tolerant species, including those native to the San Diego County Coastal Zone.

Adjacent Parcels Use

Future development of adjacent parcels, west of the Topgolf Project site, as a result of the land use designation changing from Industrial Business Park to Commercial Recreation is not known at this time.

Port Master Plan Amendment

The Project would require a PMPA to change the land use designations from Industrial Business Park, Open Space, and Harbor Services to Commercial Recreation and Park/Plaza (Figure 2) to allow for overnight accommodation uses including hotels, restaurants, retail, entertainment attractions, a convention center, recreational vehicle parks, specialty shopping, pleasure craft marinas, water-dependent educational and recreational program facilities and activities, dock and dine facilities, and sportfishing, as well as an array of active and passive recreational uses, including a shoreline promenade, and to add the East Harbor Island Redevelopment/Topgolf Project to the PMP's Project List for Planning District 2 per Section 30711 of the California Coastal Act. As noted below, if the PMPU is certified prior to approval of the Project, no PMPA would be required.

The Project would also involve subsequent issuance of Coastal Development Permit(s) and associated real estate agreement(s).

Port Master Plan Update

As a separate and unrelated action, the District is in the process of updating its certified PMP. The District has circulated for public review a PMPU Draft Program EIR (PMPU Draft PEIR) and is now preparing the PMPU Final PEIR and Draft PMPU. The District anticipates seeking Board of Port Commissioners (Board) certification of the PMPU Final PEIR and approval of the PMPU in 2024. Following approval of the PMPU, the District will seek certification of the PMPU by the California Coastal Commission (CCC). The CCC-certified PMPU must be adopted by the Board and then returned to the CCC for final acceptance (collectively called the "certified PMPU"). The EIR for this Project will analyze the Project's consistency with both the existing PMP and the Draft PMPU.

Environmental Considerations

The Draft EIR will address the following potential Project-related and cumulative environmental effects as described in the Initial Study prepared for the Project (attached):

- Aesthetics
- Air quality
- Biological resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology and water quality
- Land use and planning
- Noise
- Public services
- Transportation
- Tribal Cultural Resources
- Utilities and service systems

The Draft EIR will also address other potential impacts identified during the NOP process, identify feasible mitigation measures and a reasonable range of alternatives, and include the other additional mandatory sections required by CEQA. The Environmental Initial Study Checklist is attached.

NOP Comments

This Revised NOP is available for an extended 30-day public review period that ends at 5:00 p.m. on January 16, 2024. Comments previously submitted via email should be resubmitted. The NOP is available for public review online at: https://www.portofsandiego.org/public-records/port-updates/notices-disclosures/ceqacoastal-act-notices?page=0. Written comments regarding the scope and content of the environmental information that should be included in the EIR and other environmental concerns should be emailed to EHITopgolf@portofsandiego.org or mailed to:

San Diego Unified Port District
Development Services Department
Attn: Megan Hamilton, Senior Planner
3165 Pacific Highway
San Diego, California 92101

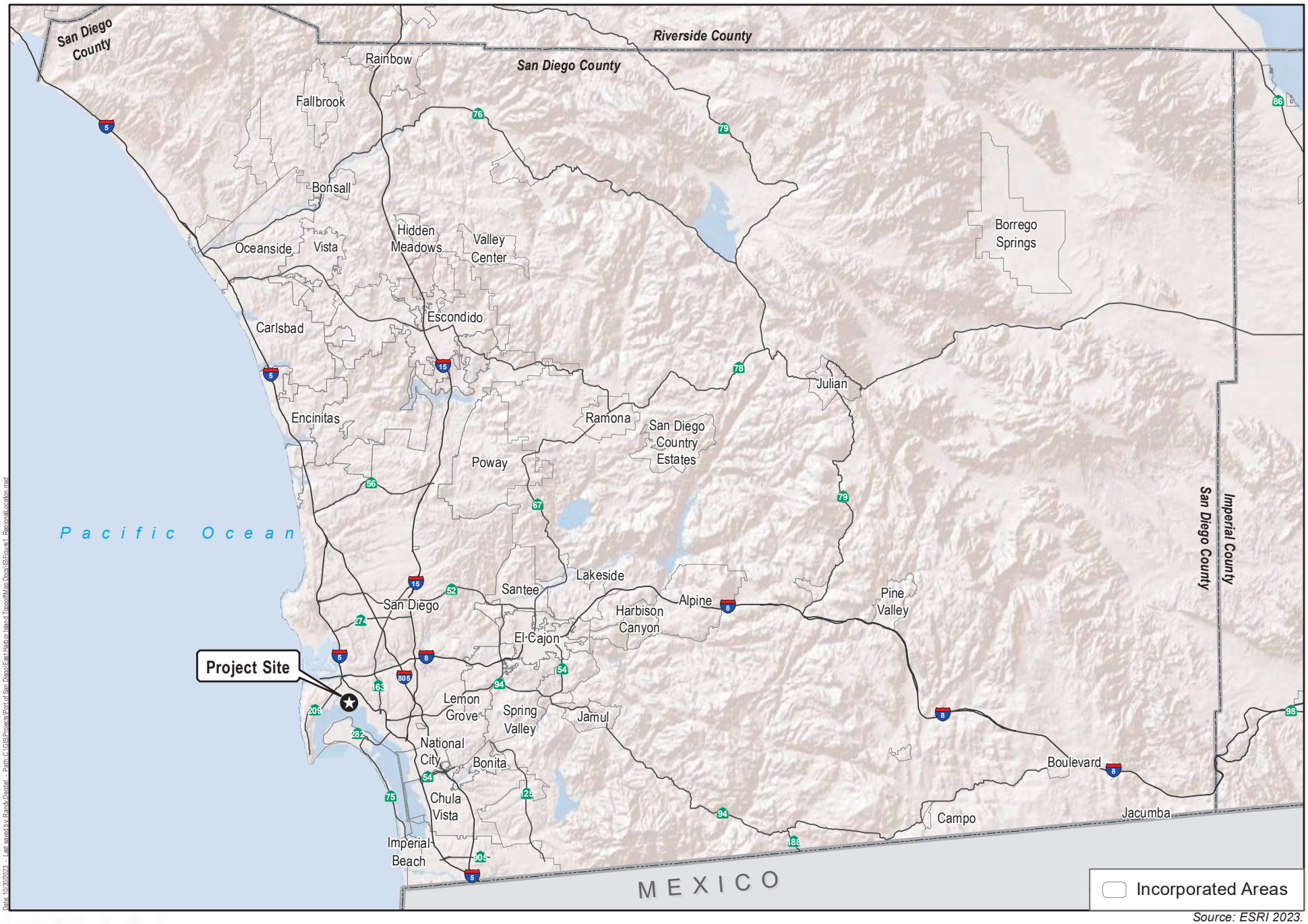
The District, as the CEQA lead agency, will review the public comments received during the scoping period to determine what issues should be addressed in the EIR. Other opportunities for the public to comment on the potential environmental effects of the Project are as follows:

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

For questions regarding this Revised NOP, please contact the District Development Services Department at (619) 686-6419.

Attachments

Figure 1: Regional Location
Figure 2: Project Area
Figure 3a: Topgolf Project Profile
Figure 3b: Topgolf Project Elevations
Environmental Initial Study Checklist



Source: ESRI 2023.

Harris & Associates

N

0 5 10

Miles

Figure 1

Regional Location

East Harbor Island Redevelopment/Topgolf Project

This page intentionally left blank.



Path: C:\GIS\Projects\City of Perris\Perris Valley Industrial Project\Map Docs\NOP

Source: Port of San Diego 2023.

Harris & Associates

N

0 375 750

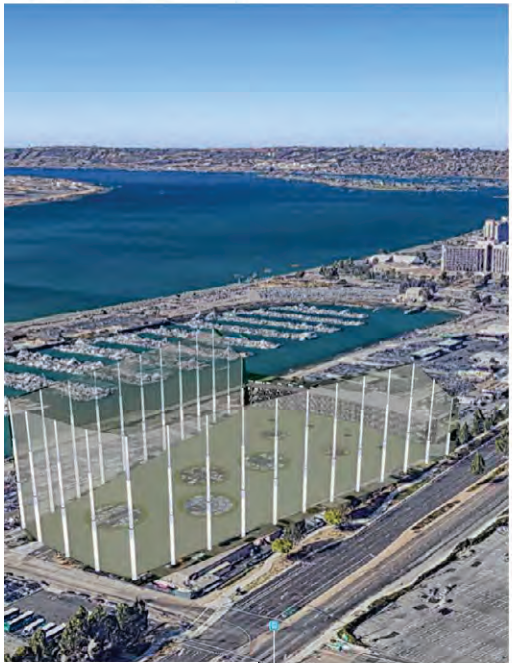
Feet

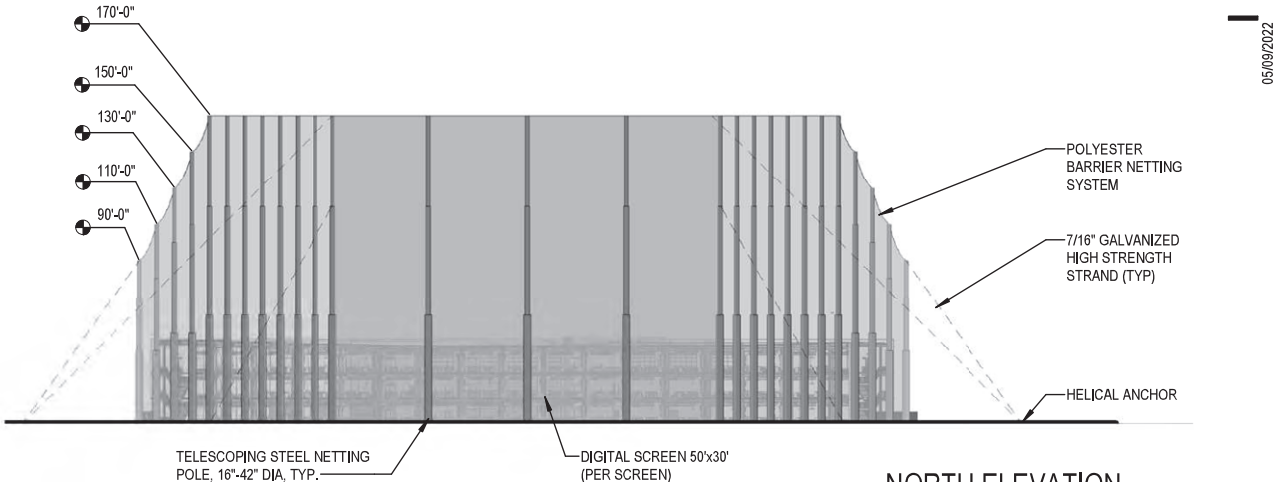
Figure 2

Project Area

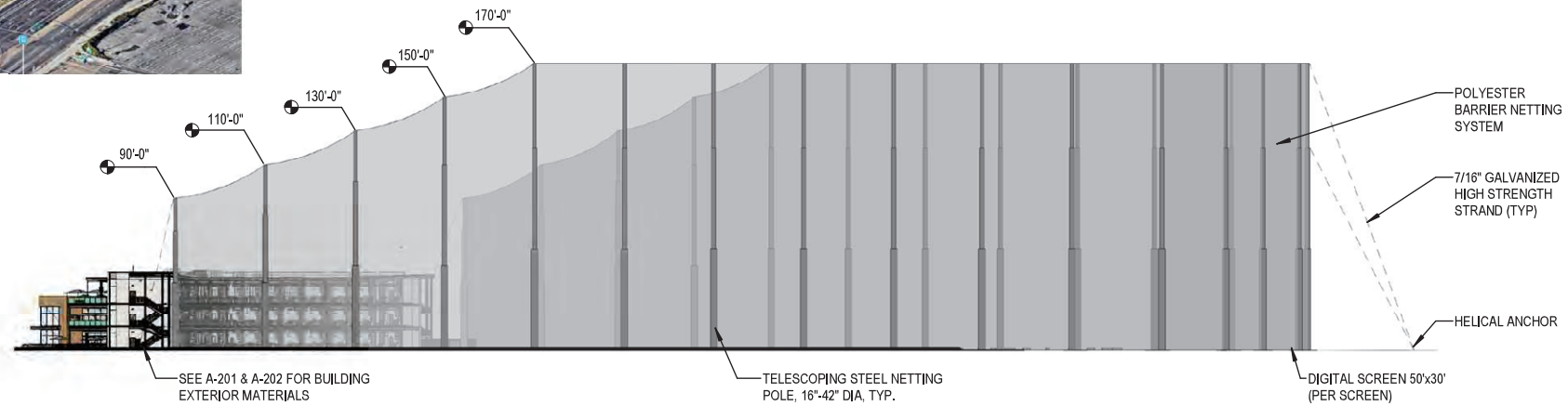
East Harbor Island Redevelopment/Topgolf Project

This page intentionally left blank.





02 NORTH ELEVATION
SCALE: 1/64" = 1'-0"



01 EAST ELEVATION
SCALE: 1/64" = 1'-0"

05/09/2022

The outfield spans just over 4.5 acres and includes 10 underground targets for golfers to hit into. The outfield is surrounded by a polyester barrier netting system suspended on poles that range between 90’ and 170’ in height from the building’s FFE.

Source: Port of San Diego 2023.

Figure 3a

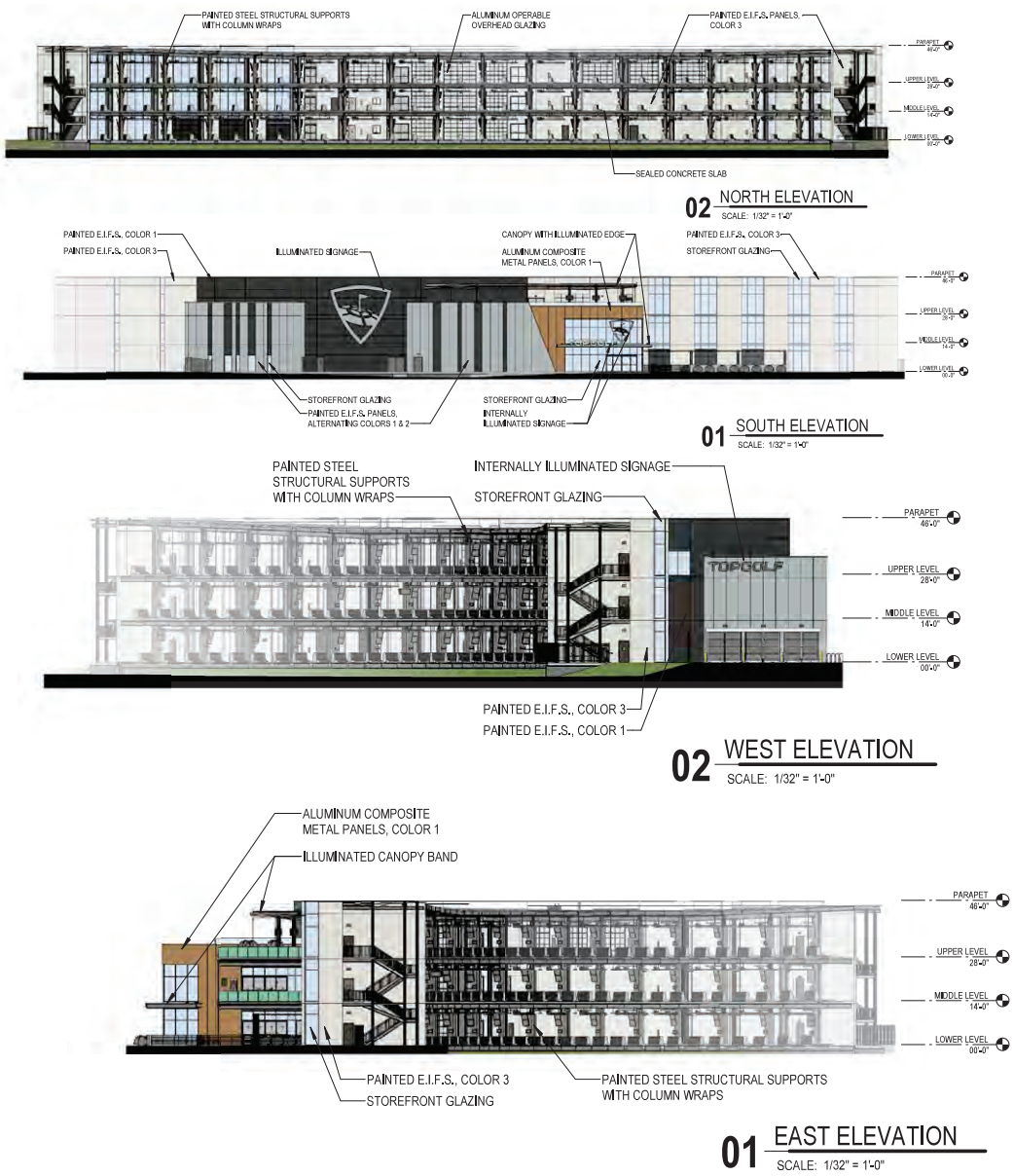
Topgolf Project Profile

East Harbor Island Redevelopment/Topgolf Project

Harris & Associates

Path: C:\GIS\Projects\City of Perris\Perris Valley Industrial Project\Map Docs\NOP

This page intentionally left blank.



In total, the building stands 46'-0" in height. The building is clad with storefront glazing, colored EFIS and composite metal panels.

Source: Port of San Diego 2023.

Figure 3b

Topgolf Project Elevations

East Harbor Island Redevelopment/Topgolf Project

Harris & Associates

Path: C:\GIS\Projects\City of Perris\Perris Valley Industrial Project\Map Docs\NOP

This page intentionally left blank.

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

January 16, 2024

Board of Port Commissioners
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101

Re: Coastal Commission Comments on NOP for East Harbor Island Redevelopment/Topgolf Project

Dear Chairman Rafael Castellanos and Commissioners:

Coastal Commission (Commission) staff appreciates the opportunity to review and provide the following comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the East Harbor Island Redevelopment/Topgolf Project which was emailed to Commission staff on November 17, 2023. The project includes the demolition of unoccupied rental car facilities and associated structures; realignment of Liberator Way; redevelopment of approximately 10 acres for a 50 ft. tall, 70,700 sq. ft. golf driving range complex (Topgolf) surrounded by 170 ft. tall netting, and associated restaurant and retail uses and parking; and 10.8 acres of public realm improvements including a 15-20 ft. public promenade and water-based transfer point.

Standard of Review

The proposed project will require an amendment to the certified Port Master Plan followed by the issuance of a coastal development permit by the San Diego Unified Port District, which will be appealable to the Commission.

California Code of Regulations Title 14, Section 13636 calls for port master plan amendments to be certified in the same manner as port master plans. Section 30711 of the Coastal Act (Pub. Resources Code, Div. 20) states, in part, that a port master plan shall include all of the following: (1) the proposed uses of land and water areas, where known; (2) the projected design and location of port land areas, water areas, berthing, and navigation ways and systems intended to serve commercial traffic within the area of jurisdiction of the port governing body; (3) an estimate of the effect of development on habitat areas and the marine environment, a review of existing water quality, habitat areas, and quantitative and qualitative biological inventories, and proposals to minimize and mitigate any substantial adverse impact; (4) proposed projects listed as appealable in Section 30715 in sufficient detail to be able to determine their consistency with the policies of Chapter 3 (commencing with Section 30200) of the Coastal Act; and (5) provisions for adequate public hearings and public participation in port planning and development decisions. Section 30711 further requires a port

master plan to contain information in sufficient detail to allow the Commission to determine its adequacy and conformity with the Coastal Act. Section 30700 of the Coastal Act states that Chapter 8 shall govern those portions of the San Diego Unified Port District, excluding any wetland, estuary, or existing recreation area indicated in Part IV of the Coastal Plan. The entire water area under the jurisdiction of the Port of San Diego is governed by Chapter 3 policies because San Diego Bay is mapped as an estuary and wetland in Part IV of the Coastal Plan, and on the maps adopted by the Commission pursuant to Section 30710 of the Act. Section 30714 provides that the Commission shall certify a PMP if it conforms with and carries out the policies of Chapter 8 of the Coastal Act or, where a PMP provides for any of the developments listed as appealable to the Commission pursuant to Section 30715 of the Coastal Act, then that portion of the PMP must also be consistent with the Chapter 3 policies of the Coastal Act. Section 30716 requires that an amendment to a PMP meet the same standards of review.

Finally, a unique provision with the review of Port Master Plans, and any subsequent amendments, is that the Commission may not adopt suggested modifications to them, as is provided for in the review of local coastal programs. (§ 30714.) Therefore, port master plans and subsequent amendments must be either approved or denied as submitted. Thus, it is critical that our offices closely coordinate to ensure the final plan is consistent with Chapter 8, and where applicable Chapter 3 of the Coastal Act.

Need for a Port Master Plan Amendment (PMPA)

The NOP indicates that no PMPA would be required if the Port Master Plan Update is certified prior to the approval of the project. However, a PMPA is required for the reasons identified above regardless of the PMPU, unless the PMPU is revised to incorporate the subject project, including adding it to the project list.

Birds and Bats

Commission staff is concerned that the proposed project will impact avian and bat species given that the site is located on the Pacific Flyway for migrating birds, and in close proximity to the California least tern nesting site at the San Diego International Airport and San Diego Bay. Please evaluate impacts to these species from the associated lighting, noise, and netting, including obstructions to movement and foraging, as well as entanglement. Alternatives should be evaluated that would avoid adverse impacts, including an alternative that does not include nets (i.e., uses virtual simulators instead of nets).

Lighting

Commission staff is also concerned that the lighting for the proposed project, if consistent with other Topgolf facilities, would cause significant visual and

biological impacts; instead, lighting should be designed consistent with other recent projects in the Port and San Diego Coastal Zone and be the minimum necessary, not exceed a correlated temperature of 3,000 kelvins, and be shielded and directed downward to reduce light trespass, glare and impacts on biological species.

Bulk and Scale

The project site lies between Harbor Drive, a major coastal accessway, and San Diego Bay and future development should open up public views to the bay from Harbor Drive. We are concerned that the bulk and scale of the proposed development would instead wall off scenic public views of the bay and Harbor Drive. Alternatives should be evaluated that would minimize the bulk/scale of the buildings and provide view corridors of the bay.

Lower-Cost Visitor Serving Facilities

Lower-cost visitor and recreational facilities should be provided as part of the project. Given its location on public tidelands, the small fraction of the public who participate in golf activities, and the high cost typical of Topgolf facilities, how will members of the general public be guaranteed adequate access to the 10 acres dedicated to the golf complex? How will the Port ensure that adequate parking remains available and affordable for members of the public wishing to visit the shoreline? What free or lower-cost visitor serving uses or facilities will be provided? What bike and pedestrian facilities will be provided to ensure public access to and along the shoreline?

Public Realm Improvements

The project description indicates that the project “could” include public realm improvements. These components should be required as a condition of approval for any project to be completed prior to the commercial improvements.

Public Trust Consistency

Please include a discussion of how the project could be found consistent with the public trust since golf is not a traditional use encouraged by the public trust.

Please note that these comments have been submitted on the part of staff and the Commission itself would be the ultimate decision-making body. These comments are based on the information that has been presented to us thus far and are not binding; the Commission and staff may have further comments or identify additional issues over time. We look forward to continuing our coordination with Port staff on this project. If you have any questions or require further clarification, please do not hesitate to contact me at Melody.Lasiter@coastal.ca.gov.

Sincerely,



Melody Lasiter
Coastal Program Analyst
California Coastal Commission

CC (via email):

Dr. Kate Huckelbridge, California Coastal Commission
Karl Schwing, California Coastal Commission
Diana Lilly, California Coastal Commission
Kanani Leslie, California Coastal Commission

From: Megan Hamilton
To: Hart, Leslie@Wildlife
Cc: Wilkins, Eric@Wildlife
Subject: RE: East Harbor Island Redevelopment/Topgolf Project In-Water Construction Inquiry
Date: Wednesday, November 29, 2023 12:00:00 PM
Attachments: image001.jpg

No problem Leslie.
I will make a note to share any additional information with you regarding potential in-water work for the East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment, as it becomes available.
Regards,

Megan Hamilton
Senior Planner
Development Services
(619) 380-0765

From: Hart, Leslie@Wildlife <Leslie.Hart@Wildlife.ca.gov>
Sent: Wednesday, November 29, 2023 10:48 AM
To: Megan Hamilton <mhamilton@portofsandiego.org>
Cc: Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>
Subject: RE: East Harbor Island Redevelopment/Topgolf Project In-Water Construction Inquiry

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Megan,

Thank you for your response and providing this information regarding the East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment. As the project progresses, I would greatly appreciate receiving updates regarding any proposed in-water construction.

Thank you,
Leslie

Leslie Hart
Environmental Scientist
California Department of Fish and Wildlife
Marine Region - Environmental Review and Water Quality Project
3030 Old Ranch Parkway, Suite 400, Seal Beach, CA 90740
Leslie.Hart@wildlife.ca.gov
www.wildlife.ca.gov

Every Californian should conserve water. Find out how at:

SaveOurWater_Logo

SaveOurWater.com · Drought.CA.gov

From: Megan Hamilton <mhamilton@portofsandiego.org>
Sent: Monday, November 27, 2023 1:30 PM
To: Hart, Leslie@Wildlife <Leslie.Hart@Wildlife.ca.gov>
Cc: Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>
Subject: RE: East Harbor Island Redevelopment/Topgolf Project In-Water Construction Inquiry

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Hello Leslie,
The proposed Port Master Plan Amendment to change the land use designation at East Harbor Island from Industrial Business Park to Commercial Recreation would allow for the uses cited below. However, for this particular project, there is no in-water work proposed for things like marinas or dock and dine facilities. All new facilities constructed would be landside.
However, there could be some in-water work associated with revetment/rip rap repair and stormwater outlet replacement/upgrades. Details of repairs/replacement are not known at this time. More details will become known as surveys and technical studies are completed as part of the EIR process.
It is anticipated that most, if not all, repair/replacement work could be done from the land. However, it is possible that some repair/replacement work may also be necessary from the water, likely via a barge.
Hopefully, this information suffices for now. I am happy to keep you informed as the project progresses.
Thank you,

Megan Hamilton
Senior Planner
Development Services
(619) 380-0765

From: Hart, Leslie@Wildlife <Leslie.Hart@Wildlife.ca.gov>
Sent: Monday, November 27, 2023 12:26 PM
To: Megan Hamilton <mhamilton@portofsandiego.org>
Cc: Wilkins, Eric@Wildlife <Eric.Wilkins@wildlife.ca.gov>
Subject: East Harbor Island Redevelopment/Topgolf Project In-Water Construction Inquiry

CAUTION: This email originated from outside of the organization. Do not click links or open

attachments unless you recognize the sender and know the content is safe.

Good afternoon Ms. Hamilton,

The Department of Fish and Wildlife's Marine Region is in process of reviewing the East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment Notice of Preparation (NOP) of a Draft EIR, SCH #2023110463.

The NOP mentions that the Project would require a Port Master Plan Amendment that would include pleasure craft marinas, water-dependent educational and recreational program facilities and activities, dock and dine facilities, sportfishing, and a shoreline promenade. Will there be any in-water construction, or any construction below knee-high water, for this Project? If so, I would greatly appreciate additional information regarding the Project's in-water construction plans. I would also be open to scheduling a meeting for further discussion to understand what the in-water construction entails.

Thank you,
Leslie

Leslie Hart
Environmental Scientist
California Department of Fish and Wildlife
Marine Region - Environmental Review and Water Quality Project
3030 Old Ranch Parkway, Suite 400, Seal Beach, CA 90740
Leslie.Hart@wildlife.ca.gov
www.wildlife.ca.gov

Every Californian should conserve water. Find out how at:

SaveOurWater_Logo

SaveOurWater.com · Drought.CA.gov

DocuSign Envelope ID: D1FA1805-8E2C-4B62-934C-9C1AB4CD03B5

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 18, 2023

Megan Hamilton
San Diego Unified Port District
3165 Pacific Highway
San Diego, CA 92101
mhamilton@portofsandiego.org

Dear Megan Hamilton:

SUBJECT: EAST HARBOR ISLAND REDEVELOPMENT/TOPGOLF PROJECT AND PORT MASTER PLAN AMENDMENT (PROJECT), NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT (NOP), SCH #2023110463

The California Department of Fish and Wildlife (CDFW) received a NOP from the Port of San Diego for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

DocuSign Envelope ID: D1FA1805-8E2C-4B62-934C-9C1AB4CD03B5

PROJECT DESCRIPTION SUMMARY

Proponent: San Diego Unified Port District (Port)

Objective: The objective of the Project is to redevelop portions of East Harbor Island. Project activities include demolition of several existing structures, street realignment, construction of a 10-acre Topgolf complex, and future redevelopment of adjacent parcels. The Project also includes a Port Master Plan Amendment (PMPA) to change the land use designation from Industrial Business Park, Open Space, and NA Harbor Services to Commercial Recreation and Park/Plaza.

Location: The 43-acre Project site is located on the eastern section of Harbor Island in San Diego Bay. The site is bounded to the north by North Harbor Drive and the San Diego International Airport, to the west by Harbor Island Drive, to the south by Liberator Way and the East Basin of San Diego Bay, and to the east by the Convair Lagoon portion of San Diego Bay. The Project site is mostly developed currently, including several buildings, rental car companies, and San Diego International Airport facilities proposed for demolition. The existing San Diego Harbor Police facilities will remain.

Biological Setting: The San Diego Bay shoreline is located within the Pacific Flyway. Although the terrestrial portion of the Project area is largely developed, the shoreline and ornamental vegetation provides important stopover habitat for migratory species and shorebirds. San Diego Bay waters support many resident and migratory fish and special status wildlife, such as seabirds, marine mammals, and sea turtles. Important marine plants such as eelgrass (*Zostera marina*) support those fish and wildlife species and may be present throughout shallow coastal environments in San Diego Bay. Eelgrass is important as fish nursery habitat and supports juvenile and adult fish. San Diego Bay waters also support commercially and recreationally important fish and invertebrate species such as California halibut (*Paralichthys californium*), California spiny lobster (*Panulirus interruptus*), and the important forage fish Northern anchovy (*Engraulis mordax*).

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below for the public record, to assist the Port in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources.

Comment #1: California Least Terns

The Project proposes to install 170' poles to support safety netting for the Topgolf facility. Raptors are known to utilize elevated perching sites as vantage points for hunting and observing potential prey. It is estimated that line-of-sight for some raptor species can reach a distance of up to 1 mile (Vance et al., 2000). The Initial Study indicates that there is a California least tern (*Sternula antillarum browni*, least tern) nesting site within 0.5 mile of the Project site. Least terns are listed as endangered under both the California

DocuSign Envelope ID: D1FA1805-8E2C-4B62-934C-9C1AB4CD03B5

Endangered Species Act (CESA) and the federal Endangered Species Act (ESA) and are also fully protected under FGC section 3511(b)(6). As a fully protected species, take cannot be authorized for least tern and impacts must be fully avoided. Installation of poles that act as raptor perches could be detrimental to the nearby least tern colony, as raptors may prey on vulnerable least tern chicks. The Initial Study indicates that further analysis will be included in the EIR. CDFW recommends that the analysis include specific measures to ensure that raptors do not use the poles as perches, including methodology supported by scientific literature. The measures should ensure that impacts to least tern are fully avoided by the Project and by future operation of the facilities.

Comment #2: Bird Entanglement

The installation of golf netting poses the potential risk of entanglement for migratory birds along the Pacific Flyway. Migrating birds, including waterfowl and shorebirds, are susceptible to entanglement in man-made structures. The installation of golf netting may increase the likelihood of entanglement incidents, particularly during migration seasons when large numbers of birds fly through the area, as well as periods of low visibility such as during fog. There have been several incidents of bird entanglement in Topgolf netting throughout the country (WKMG, 2019; Miami Herald, 2023). CDFW requests that the EIR discuss in detail the netting design, mesh size, and gauge, as well as provide evidence that the netting does not pose an entanglement risk. The assessment should include mitigation measures to minimize the risk of bird entanglement, as well as monitoring and management protocols to assess mitigation success upon completion of the Project. CDFW should be notified immediately if any wildlife species become entangled in the golf netting.

Comment #3: Night Lighting

The Initial Study indicates that the Topgolf complex will have evening operation hours, and that a lighting plan will be prepared to evaluate the potential biological impacts. Night lighting may negatively impact bird and bat behavior by causing disorientation, disruption of migration patterns, collisions with structures, altered feeding habits, and increasing the likelihood for entanglement in golf netting. The indirect impacts can lead to reduced fitness, population declines, and direct mortality of individuals. The lighting study should, at a minimum, include details such as lighting design, lighting intensity and spectrum, use of motion sensors and timers, specific light operation schedule, incorporation of vegetation or other visual barriers between light and wildlife, and education and monitoring protocols. Mitigation measures should incorporate science-based approaches to minimizing wildlife impacts from night lighting.

Comment #4: Potential Marine Construction

Per communication with the San Diego Port Unified District, there could be some in-water work associated with the Project's proposed revetment/riprap repair and stormwater outlet replacement/upgrades. CDFW's Marine Region recommends that any planned in-water work for the Project should be fully described in the Draft EIR, including the purpose and need of the construction and a description of all marine habitats and species that may be

DocuSign Envelope ID: D1FA1805-8E2C-4B62-934C-9C1AB4CD03B5

impacted by the Project's activities. CDFW's Marine Region recommends consulting with us prior to the release of the DEIR if any in-water work is planned.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP to assist the Port in identifying and mitigating Project impacts on biological resources.

Questions and further coordination on terrestrial issues should be directed to Jessie Lane, Environmental Scientist, at Jessie.Lane@wildlife.ca.gov. Questions and further coordination on marine issues should be directed to Leslie Hart, Marine Environmental Scientist, at Leslie.Hart@wildlife.ca.gov.

Sincerely,

DocuSigned by:
David Mayer
D700B4520375406...

David Mayer
Environmental Program Manager
South Coast Region

DocuSign Envelope ID: D1FA1805-8E2C-4B62-934C-9C1AB4CD03B5

ec: CDFW
Cindy Hailey, San Diego – Cindy.Hailey@wildlife.ca.gov
Eric Wilkins, San Luis Obispo – Eric.Wilkins@wildlife.ca.gov
CEQA Program Coordinator, Sacramento

OPR
State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov

References

Miami Herald. 2023. Huge bird stuck in net closes Topgolf for hours. https://www.miamiherald.com/news/nation-world/national/article280353029.html#storylink=cpy

San Diego Audubon. 2023. Lights Out, San Diego! https://www.sandiegoaudubon.org/what-we-do/lights-out-san-diego-english.html

Vance A. Tucker, Alice E. Tucker, Kathy Akers, James H. Enderson; Curved Flight Paths and Sideways Vision in Peregrine Falcons (Falco Peregrinus). J Exp Biol 15 December 2000; 203 (24): 3755–3763. doi: https://doi.org/10.1242/jeb.203.24.3755

WKMG Orlando. 2019. Hawk tangled in Topgolf net released after treatment for minor injuries. https://www.clickorlando.com/news/2019/11/20/hawk-tangled-in-topgolf-netting-being-evaluated-after-rescue/

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 709-5152 | FAX (619) 688-4299 TTY 711
www.dot.ca.gov

December 11, 2023

11-SD-5
PM 17.2
East Harbor Island Redevelopment & Port Master Plan Amendment
NOP SCH#2023110463

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

Dear Ms. Megan Hamilton:

Thank you for including the California Department of Transportation (Caltrans) in the review process of the East Harbor Island Redevelopment and Port Master Plan Amendment project located near Interstate 5 (I-5). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Traffic Analysis

- A Vehicle Miles of Travel (VMT) based Traffic Impact Study (TIS) should be provided for this project. Please use the Governor's Office of Planning and Research Guidance to identify VMT related impacts.[1]

- The TIS may also need to identify the proposed project's near-term and long-term safety or operational issues, on or adjacent to any existing or proposed State facilities.

[1] California Governor's Office of Planning and Research (OPR) 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Complete Streets
Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network.

Early coordination with Caltrans, in locations that may affect both Caltrans and the Port of San Diego or other lead agencies, is encouraged.

Noise
The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5.

Right-of-Way
Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

Any work performed within Caltrans' Right of Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide approved final environmental documents for this project, corresponding technical studies, and necessary regulatory and resource agency permits, specifically, the California Environmental Quality Act determination or exemption.

If you have any questions or concerns, please contact Roger Sanchez, LDR Coordinator, at (619) 987-1043 or by e-mail sent to roger.sanchez-rangel@dot.ca.gov.

Sincerely,

Kimberly Dodson

Kimberly Dodson
Acting Branch Chief
Local Development Review

Governor's Office of Planning & Research
Dec 08 2023
STATE CLEARINGHOUSE

From: Frost, Erik@DOC
To: ehitopgolf@portofsandiego.org
Cc: OLRA@DOC; OPR State Clearinghouse
Subject: East Harbor Island Redevelopment/Topgolf Project (SCH 2023110463) - CGS comments
Date: Friday, December 8, 2023 9:30:14 AM

Attn: Megan Hamilton,

The California Geological Survey (CGS) has received a Notice of Preparation for a Draft Environmental Impact Report (DEIR) for the East Harbor Island Redevelopment/Topgolf Project. This email conveys the following recommendations from CGS concerning geologic issues related to the project area:

1. Surface Fault Rupture
   The project area is intersected by a zone of required investigation for surface fault rupture associated with the Rose Canyon Fault Zone.
   This potential hazard should be addressed in the DEIR. Additional information is available here:
   https://maps.conservation.ca.gov/cgs/EQZApp/app/
   https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

If you have any comments or questions, please feel free to call or email.

Erik

Dr. Erik Frost
Senior Engineering Geologist | Seismic Hazards Program
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814
(916) 205-8255
erik.frost@conservation.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION

RECEIVED
NOV 27 2023
San Diego Unified Port District
Development Services Department

November 21, 2023

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

Re: 2023110463, East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment, San Diego County

Dear Ms. Hamilton:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Laurena Bolden
Serrano

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Vacant

EXECUTIVE SECRETARY
Raymond C. Hitchcock
Miwok, Nisenan

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- **a.** A brief description of the project.
- **b.** The lead agency contact information.
- **c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- **d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).

- **a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- **a.** Alternatives to the project.
- **b.** Recommended mitigation measures.
- **c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- **a.** Type of environmental review necessary.
- **b.** Significance of the tribal cultural resources.
- **c.** Significance of the project's impacts on tribal cultural resources.
- **d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- **a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
- **b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:

a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or

b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

a. Avoidance and preservation of the resources in place, including, but not limited to:

i. Planning and construction to avoid the resources and protect the cultural and natural context.

ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:

i. Protecting the cultural character and integrity of the resource.

ii. Protecting the traditional use of the resource.

iii. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.

b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Pricilla.Torres-Fuentes@nahc.ca.gov.

Sincerely,

Pricilla Torres-Fuentes

Pricilla Torres-Fuentes
Cultural Resources Analyst

cc: State Clearinghouse

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

January 9, 2024

Ms Megan Hamilton
San Diego Unified Port District
Development Services Department
3165 Pacific Highway
San Diego, California 92101

RE: East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment – Notice of Preparation of Draft Environmental Impact Report

Dear Ms Hamilton:

As both the operator of San Diego International Airport (SDIA) and the Airport Land Use Commission (ALUC) for San Diego County, the San Diego County Regional Airport Authority (SDCRAA) appreciates the opportunity to provide the following comments on the project indicated above.

Coordination with Airport to Avoid Airspace Impacts

Because of the project proximity and the potential airspace impacts to SDIA, SDCRAA requests that the project sponsor continuously coordinate with SDIA operations and Air Traffic Control Tower staff on the construction phasing to ensure no adverse flight procedure impacts occur to SDIA operations and adequate notice is given to airport users, particularly in conditions of limited visibility such as marine layer fog.

Project Description

Please provide the following information and necessary details that require further evaluation:

- Hours of operation of the proposed land uses
- Site plans which depict vehicle and pedestrian access to the project as well as the precise locations of all netting support poles and outdoor lights with height callouts and indications of each directional orientation of all outdoor lights
- Engineering details on the precise improvements and realignment of Liberator Way, including a construction schedule disclosing duration of any closures

- Indication of whether or not temporary cranes will be involved in the construction of each component of the project: building, netting support poles, and outdoor lights
- Determinations from the Federal Aviation Administration (FAA) regarding each cardinal point of the building, each pole or lighting standard, and—if applicable—construction crane heights at their respective site locations based on the FAA Obstruction Evaluation/Airport Airspace Analysis process per electronic filings of FAA Form 7460-1

Aesthetics

As acknowledged by the Initial Study, the project's lighting could create a potentially significant source of glare, and based on the orientation of that lighting, it could constitute a source of distracting and confusing lighting to pilot and air traffic controller vision, particularly on aircraft approach to Runway 27. Full disclosure of all lighting details should be provided for consideration. To the extent possible, all outdoor lighting should prevent offsite light trespass by being shielded and directed away from the airport runway orientation and air traffic control tower.

Biological Resources

SDIA maintains nesting habitat on airport property for the endangered California least tern, which is monitored by state and federal wildlife agencies, and additional foraging habitat for this species exists within the project vicinity along San Diego Bay. Project lighting should be directed away from habitat, and potential perch locations of birds predatory to the least tern within the project site must be avoided or mitigated to the extent possible.

Noise and Hazards/Hazardous Materials

As acknowledged by the Initial Study, the project site is located the 60-65 decibel Community Noise Equivalent Level (dB CNEL) of the SDIA Airport Land Use Compatibility Plan (ALUCP) adopted by SDCRAA in its capacity as the ALUC for San Diego County. Because the Port District has not integrated the land use compatibility standards of the SDIA ALUCP into the Port Master Plan and received a determination of consistency of the Port Master Plan with the ALUCP from the ALUC, the project must be referred to SDCRAA as the ALUC for a consistency determination with the ALUCP. The application for consistency determination will require copies of the aforesaid FAA determinations for both the building and

construction cranes (if applicable) with details addressing the outdoor lighting as indicated in comments above.

Transportation

Vehicle Trips Generated: As a new entertainment and recreational attraction, the project will generate new vehicle trips that will likely increase traffic along Harbor Drive and nearby streets and intersections within the project vicinity. Those specific street segments and intersections should be disclosed and analyzed in a traffic impact analysis to include addressing how the new trips contribute to cumulatively considerable traffic impacts in the local setting given the existing traffic conditions on Harbor Drive and related nearby streets. Specifically, the following intersections should be evaluated in the traffic analysis:

- Harbor Island Drive/new driveway
- Harbor Island Drive/North Harbor Drive
- Liberator Way/North Harbor Drive
- Crosswind Way/North Harbor Drive
- West Laurel Street/North Harbor Drive
- West Laurel Street/Pacific Highway
- Grape Street/North Harbor Drive
- Hawthorn Street/North Harbor Drive

Parking: The project description indicates that the project will provide 293 parking spaces. The origin and statistical validity of this figure to serve the project should be disclosed. Considering the project location in proximity to the greater downtown area and SDIA, both of which have a significant base of lodging tourists who use only hotel courtesy shuttles, taxis, or rideshare vehicles rather than personal vehicles, it is reasonable to conclude that a substantial portion of trips generated by the project will also use taxis and rideshare vehicles that require only pick-up and drop-off zones on project property rather than dedicated parking spaces.

These circumstances suggest that the proposed 293 parking spaces may be considerably more than necessary to support the project. This concern is particularly important to SDIA since airport leases of existing parking spaces within the project site may be potentially displaced, necessitating replacements elsewhere within a high-demand parking environment which is already constrained by ongoing airport construction with existing limited and now further reduced parking capacity.

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Additionally, the access control to parking spaces dedicated to serve the project spaces should be disclosed. The presence of presumably free parking for the project within the high-demand parking environment of SDIA could inappropriately incentivize and attract airport patrons to use parking which should be reserved only for the project. Attracting airport users for parking would have adverse parking revenue impacts to SDIA and other private parking providers in the vicinity and would generate additional pedestrian or taxi and rideshare vehicle trips unrelated to project use which should be disclosed and analyzed as part of project impacts.

Again, SDCRAA appreciates the opportunity to provide comments on the project and reiterates a request for continued coordination with staff throughout the project timeline to ensure SDIA and San Diego County ALUC concerns are addressed. Thank you for your consideration of these comments, and SDCRAA looks forward to reviewing the responses and analysis of the concerns identified in this letter. Please contact Sjohnna Knack, Director of Planning, Noise, and Environmental Affairs, at sknack@san.org or (619) 400-2639 to further discuss any concerns in this letter or answer any questions.

Sincerely,



Angela Shafer-Payne
Vice President/Chief Development Officer

ASP/eg

January 16, 2024

San Diego Unified Port District, Development Services Department
Attn: Megan Hamilton
Senior Planner (EHITopgolf@portofsandiego.org)
3165 Pacific Hwy
San Diego, CA 92101

Re: Comments – CEQA Scoping for East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment (UPD #EIR 2023-134)

Dear Ms. Hamilton,

On behalf of San Diego Coastkeeper ("Coastkeeper"), please accept the following comments regarding the Revised Notice of Preparation ("NOP") for the Draft Environmental Impact Report ("DEIR") for the East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment (UPD #EIR 2023-134) ("Project").

San Diego Coastkeeper works to protect and restore the waters of the San Diego region through water quality monitoring, advocacy, education, community engagement, and enforcement.

In order to fulfill the legal requirements of the California Environmental Quality Act ("CEQA"), the EIR should, among other things, (a) identify a reasonable range of alternatives that includes a "no project" alterative; (b) analyze the broad range of environmental impacts caused by the expansive project; and (c) include measures to mitigate significant environmental impacts of the project, as described below.

In light of the foregoing, Coastkeeper offers the following comments:

Public Trust and Coastal Act Conflicts:

While the NOP identifies numerous potentially significant environmental impacts warranting an EIR requirement, it fails to consider the lack of compliance with State regulations in the Coastal Act and Public Trust Doctrine. The Topgolf Project proposes to utilize 9.37 acres within the 42.98-acre project area of East Harbor Island (see NOP Figure 2). East Harbor Island ("EHI") constitutes public trust tidelands that the State of California has granted to the Port District of San Diego ("District"). The State Lands Commission implements the public trust doctrine through its application of the Coastal Act, which sets forth guidelines for managing new development within the District's jurisdiction.

The core purpose of the public trust doctrine is to protect the public's right to use California's waterways for navigation, fishing, boating, natural habitat protection and other water-oriented activities. The Public Trust provides that tide and submerged lands and the beds of lakes, streams and other navigable waterways are to be held in trust by the State for the benefit of the people of California.[1] Notably, the U.S. Supreme Court has long held that of the most important public uses encompassed within the tidelands trust is the preservation of those lands in their natural state so that they may serve as ecological units for scientific study, as open space, and as environments which provide food and habitat for birds and marine life, and which favorably affect the scenery and climate of the area.[2] The recreational and ecological values at stake in the proposed project area—public access to open waterways and preservation of natural marine habitats—are clearly among the purposes that public trust aims to protect.

The EIR should assess environmental factors with potential significant impacts in light of the public trust standards. For instance, the Project proposes to fence-off 4.5 acres of tidelands from general public recreational space and serve only as a repository for golf balls. This represents a significant loss of potential public open space that should be considered a Potentially Significant Impact for "Recreation."

The NOP fails to mention several conflicts between the proposed project and governing regulations in the Coastal Act pertaining to new development on coastal/public trust tidelands. Coastkeeper and other environmental groups have identified several provisions to be addressed in the EIR, including but not limited to the following:

- Coastal areas suited for **water-oriented recreational activities**[3] [. . .] shall be protected for such uses. Cal. Coastal Act § 30220;
- All port-related developments shall **give highest priority to the use of existing land space within harbors for port purposes**, as well as, provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible. Cal. Coastal Act § 30708;
- **Scenic and visual qualities** of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to **protect views to and along the ocean and scenic coastal areas**, to minimize the alteration of natural land forms, **to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas**." Cal. Coastal Act § 30251.

These guiding principles strongly suggest that the Project is inappropriate for its proposed location. A golf driving range is neither coastal-dependent or oriented, serves no relevant port purposes, and would adversely impact scenic coastal views and habitats. The Project would effectively privatize ten acres of prime coastal tidelands, with 170-foot-high netting no less,

---

[1] Cal. State Lands Commission, Public Engagement, https://www.slc.ca.gov/public-engagement/.

[2] *See Marks v. Whitney*, 6 Cal. 3d 251, 259–60 (1971).

[3] This includes coastal areas suited for both contact and non-contact water recreation (activities involving proximity to water where ingestion of water is reasonably possible, such as picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities). Water Quality Control Plan for the San Diego Basin (San Diego Basin Plan) at p.2-8.

excluding the general public from this space, for corporate profit. The inconsistencies between the Coastal Act and the proposed development must be assessed in the EIR.

Hydrology/Water Quality:

The NOP acknowledges the construction phase of the Project would likely result in substantial additional sources of polluted runoff. The IS notes that construction of the Project will require bulldozers, scrapers, backhoes, earthmovers, haul trucks, and generators. It will also require the cleaning and maintenance, and associated industrial materials such hydraulic oils, degreasers, and other cleaning agents. "Pollutants associated with these construction activities that could result in water quality impacts include soils/sediment, debris, fuels, and other fluids associated with the equipment used for construction."[4] Suspended sediment in surface waters can cause harm to aquatic organisms by abrasion of surface membranes, interference with respiration, and sensory perception, and reduces photosynthesis in and survival of aquatic flora by limiting the transmittance of light.[5] Suspended and settleable solids are also deleterious to benthic organisms and may cause the formation of anaerobic conditions in surface waters.[6] Therefore, the EIR must thoroughly assess and mitigate potential impacts to Hydrology and Water Quality from the Project's construction.

The IS fails to discuss the water quality impacts of the completed Project. Topgolf's outfields are commonly artificial turf. Recent scientific studies of artificial turf have found that it has significant impacts, including release of toxic chemicals including lead, perfluoroalkyl and polyfluoroalkyl substances (the forever chemicals known as "PFAS"), and microplastics.[7] Due to the location of the Project, during every rain event, these chemicals and others are extremely likely to enter San Diego Bay. These molecules then enter the food chains in the ocean, "and they're in our system, they're in our blood, they're in our muscles."[8]

Synthetic turf is one of the hottest possible surface materials, can be hotter than asphalt, and thus adds to the urban heat effect.[9] This will only worsen with climate change. Research by the National Toxicology Program shows that high heat can cause chemicals to leach out of the crumb rubber base of synthetic turf, thereby exacerbating the chemical pollutant impact of artificial turf. These leached chemicals are known to cause cell death in humans.[10] Therefore, the EIR must assess the impacts of the chemical and heat pollution caused by the completed project, and identify mitigation measures to minimize these impacts.

---

[4] IS at 33.
[5] San Diego Basin Plan at 3-31.
[6] *Id.*
[7] Shreya Agrawal, *Once it was hailed as a drought fix — but now California's moving to restrict synthetic turf over health concerns*, Cal Matters, Oct. 18, 2023, https://calmatters.org/environment/2023/10/california-synthetic-turf-pfas/ (updated Oct. 23, 2023).
[8] *Id.,* quoting Sylvia Earle, a marine life advocate and former chief scientist at the National Oceanic and Atmospheric Administration.
[9] *Id.*
[10] National Toxicology Program, Synthetic Turf/Recycled Tire Crumb Rubber Research Overview, https://ntp.niehs.nih.gov/whatwestudy/topics/syntheticturf (last updated Dec. 1, 2023).

The Project would also alter the current landscape and hydrology through the addition of a Topgolf entertainment complex and other associated facilities, which has the potential to affect drainage patterns, water quality, and cause additional pollutants to be discharged off site. Hence, the NOP correctly identifies that a Drainage Memorandum must be prepared and that further analysis is warranted in the EIR.

Biological Resources:

The Initial Study ("IS") correctly identifies that the proposed project could have significant impacts to all of the categories of biological resources. San Diego Bay hundreds of species of birds, over 100 species of marine fishes, over 45 species of algae, eleven federal/state threatened or endangered species and 50 special status species, in additional to a multitude of other flora and fauna. The sediments, oils, PFAS and other chemicals, microplastics, and heat pollution generated by the Project will negatively impact these biological resources.

As noted in the Port Master Plan Update ("PMPU") Conflicts Section below, there remains a serious omission in the NOP/IS of any reference to the biological resources policies and principles embedded in the public trust doctrine and Coastal Act—both of which are foundational to the PMP and PMPU. Accordingly, this omission suggests an even greater threat to the proposed project's impact on biological resources.

Coastkeeper requests the EIR thoroughly assess and mitigate the noise and light pollution associated with the proposed Project. This includes consideration of the impacts resulting from the land use designation change from Industrial Business Park to Commercial Recreation. Powerful floodlights from the driving range are very likely to have a significant impact on biotic behavior of the adjacent marine ecosystem. Topgolf facilities amplify music through a stereo system. Furthermore, Topgolf facilities are often open until at least midnight, extending the disruptive noise and light pollution deep into the night.

Aesthetics:

The EIR requires a thorough viewshed and aesthetics analysis. Fencing off 4.5 acres of prime coastal tidelands with 170-foot-high netting will substantially alter scenic vistas of open water and San Diego Bay. The proposed 4.5 acres of turf and target "holes" would have no scenic context to the rest of the adjacent shoreline, which adversely impacts public access and connection to the coastal environment.

Energy/Greenhouse Gas Emissions:

The EIR must assess and mitigate GHG emissions and energy consumption resulting from the Project. While the IS identified potentially significant impact from increased GHG emissions associated with construction and operation, it failed to address the possibility of even greater impacts due to the EHI land use change.

The NOP also notes that the increased GHG emissions associated with the Project would conflict with the District's Climate Action Plan. Non-compliance with the CAP not only

contributes to increased GHGs, but creates potential civil liability for the District. Therefore, CAP measures pertaining to the Project should be thoroughly addressed in the EIR to ensure compliance.

Port Master Plan Update (PMPU) Conflicts:

There are several new updates to the Port Master Plan that directly relate to new development in the Project area. For instance, one objective is to identify each water and land use's functional dependency to the water in accordance with the Coastal Act (WLU Objective 1.2).

Coastkeeper urges the District to follow its own policies in the soon-to-be-adopted Port Master Plan Update ("PMPU"), including but not limited to the following:

- Development adjacent to habitat areas occupied by threatened or endangered species shall be in compliance with the federal and California Endangered Species Acts and shall be implemented to protect the health and survival of the species. ECO Policy 1.1.7;
- Development above the water or adjacent to sensitive habitat areas should use ecologically sensitive lighting that is shielded and directed away from the water or sensitive habitat areas, sensor activated, and of the lowest possible color temperature that also meets public safety requirements. ECO Policy 1.1.10;
- Science-based management practices shall be used on Tidelands to guide water, sediment, and natural resource decisions, which includes a suite of programs, conditions, or criteria to protect and enhance ecosystems including restoring and creating wetlands, establishing new mitigation banks for eelgrass, wetlands, or other sensitive habitat types, and enhancing fisheries. ECO Policy 1.1.12;
- Strive to achieve a net increase of wetland habitat acreage from baseline conditions throughout the Bay. ECO Policy 1.1.14;
- The District shall prioritize the use of nature-based solutions composed of natural or sustainable materials that increase shoreline biodiversity and coastal resiliency, including but not limited to living shorelines and wetland and coastal habitat restoration, where feasible and applicable. ECO Policy 1.1.17;
- The District shall maximize habitat connectivity and continuity for intertidal and subtidal habitats within the Bay particularly for those areas that provide habitat and nursery areas for estuarine and marine species. ECO Policy 1.1.21;
- The District shall pursue opportunities to create, preserve, enhance or restore intertidal and subtidal habitats in areas that have historically been impacted by development. ECO Policy 1.1.23.

The EIR must assess the scope of the Topgolf project in light of these policies. This parcel represents a unique opportunity to improve the quality of public access to the San Diego waterfront—an area which has become increasingly walled off with private development. For instance, Coastkeeper requests a consideration of constructed wetlands and a return to natural conditions as an alternative to the project. Along with being more closely aligned with State and local regulations and guiding principles, this alternative could promote other benefits such as water quality improvements, carbon sequestration, climate resiliency, ecosystem benefits, and aesthetic appeal.

The first goal under the Water and Land Use Element of the PMPU is to balance the District's responsibilities under the Port Act with Coastal Act responsibilities and priorities. The implementation policies for this goal outline the types of water and land uses that support the five Public Trust uses: Commerce, Environmental Stewardship, Fisheries, Navigation, and Recreation. While "golf course" is listed as an allowable use under "Recreation," it is listed as neither "coastal-dependent" nor "coastal-related" (PMPU at 55). The only justification noted is for "coastal-enhancement," which is not a formal Coastal Act category.

While we disagree that golf courses should even be listed in the PMPU as an allowable recreational land use, the Project should nonetheless be excluded from this category. The PMPU defines "golf course" as "the grounds where the game of golf is played." (PMPU at 393). The NOP describes the Topgolf project as an "entertainment complex." Not to mention, the future redevelopment of adjacent parcels as a result of the land use designation change from Industrial Business Park to Commercial Recreation is still unknown.

Hazards:

Errant golf balls that escape the Topgolf facility over, through, and/or around the safety netting will occur. Not only do these golf balls introduce plastics into the environment,[11] it presents a serious safety issue as the Project is proposed immediately adjacent to the Bay and the extremely high-traffic North Harbor Drive. This stretch of road is the primary point of access to and from the San Diego International Airport, the busiest single runway airport in the world. Thus, the Project's location presents a recipe for disaster, and Coastkeeper strongly encourages the Port to thoroughly assess the multiple threats to public safety and environmental health in the EIR.

Alternative Measures:

An EIR must analyze a "reasonable range of alternatives to the project," with an emphasis on alternatives which "offer substantial environmental advantages over the project proposal."[12] The purpose of analyzing alternatives is to assess options for attaining the basic objectives of the project while avoiding or substantially lessening environmental impacts and to evaluate the comparative merits of each alternative.[13] Specifically, "[t]he range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" in order to "permit a reasoned choice"[14] and "foster informed decision-making and public participation."[15]

---

[11] Daniel Potter, *Teens tackle an unlikely source of plastic pollution: wayward golf balls*, Monterrey Bay Aquarium, Jun. 26, 2017, https://www.montereybayaquarium.org/stories/teens-tackle-an-unlikely-source-of-plastic-pollution-wayward-golf-balls.

[12] *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal. 3d 553, 566 (1990); California Native Plant Society v. City of Santa Cruz, 177 Cal. App. 4th 957, 982-83 (2009).

[13] 14 CCR § 15126.6

[14] Id. § 15126.6(c), (f).

[15] 14 CCR § 15126.6(a). *See also Laurel Heights Improvement Assn. v. Regents of University of California*, 47 Cal. 3d 376, 406- 07 (1988).

Coastkeeper echoes comments made by SWIA and requests the EIR consider golf simulators as a potential project alternative. Simulators are highly efficient and effective alternative to the current driving range, allow for real-time feedback on the golfer's swing, and can emulate hundreds of actual golf courses – presumably Topgolf could recreate the San Diego Bay and City of San Diego skyline as one of the virtual images.

The EIR must also analyze a "no project" alternative. This includes assessment of the gains and losses associated with relocating the project to another appropriate site. As previously noted, the loss to public trust protected tidelands and marine biodiversity should be carefully weighed against the feasibility of relocating the project to a site better suited for a driving range. The location of the Project, adjacent to a public walkway and immediately on the waterfront, would be better suited for activities such as rentals of small watercraft, kayaks, paddle boards, etc. Coastkeeper is unaware of any option for something like this on Harbor Island, despite multiple hotels and other attractions on the peninsula. The conversion of a what is currently a large parking lot also offers tremendous potential for ballfields or a sports complex for youth or public use in an area deficient of such resources.

Thank you for your consideration of our comments.

Sincerely,

Patrick McDonough
Senior Attorney
San Diego Coastkeeper

From:	Bill Tippets
To:	EHI/Topgolf
Cc:	Mike McCoy; Andrew Meyer; Jim Peugh; Lisa Ross; Pam Heatherington; Diane Coombs; Cathy Handzel; Patrick McDonough; Padmapriya Jagannathan; Lesley Handa; Bill Tippets; Don Wood
Subject:	Topgolf Notice of Preparation of an EIR
Date:	Thursday, December 14, 2023 8:58:42 AM
Attachments:	Topgolf_Joint NOP Comments_13Dec.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Ms. Hamilton:

On behalf of our six organizations, please include in the project record the attached letter that identifies many potential impacts which the referenced action may have on public tidelands and waters that the Port manages in trust for the public on behalf of the State Lands Commission.

Our organizations have long histories of working with the Port when its plans and projects are proposed that could negatively impact - or support - the conservation and management of natural resources of San Diego Bay's tidelands and waters.

We have serious concerns that the proposed Topgolf project and Port Master Plan amendment will create inappropriate and unmitigatable impacts to those resources and strongly recommend that a less impactive project be selected.

Regards,

Bill Tippets
619-822-4323

"*However beautiful the strategy, you should occasionally look at the results*"
Winston Churchill

SDWC

Southwest Wetlands Interpretive Association
PO Box 575
Imperial Beach, CA 91933

13 December 2023

San Diego Unified Port District, Development Services Department
Attn: Megan Hamilton, Senior Planner (EHITopgolf@portofsandiego.org)
3165 Pacific Hwy
San Diego, CA 92101

(submitted 14 December 2023 via email to EHITopgolf@portofsandiego.org

Subject: Notice of Preparation for East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment

Dear Ms. Hamilton:

Our organizations have extensive histories working on coastal issues, including participation in the review and processing of Port District of San Diego (Port District) planning documents and individual projects. The coastal zone and especially the public trust tidelands that are managed by the Port District are extremely valuable and threatened resources. Historical development, and more recent development proposals, threaten to further reduce bay and wetland habitat types and/or restrict restoration and enhancement that could ameliorate some of the historical and potential future losses. Those losses will likely be exacerbated by the threats from from sea level rise. We support planning that will implement a long-term sustainable vision - and

reality - for the public trust tidelands (and waters) managed by the Port District. When considering development proposals public tidelands (and waters), the Port District must strike a reasonable balance between development and conservation of tideland habitats. The proposed project fails to do that.

Our comments on the proposed Topgolf project highlight several areas of potentially significant environmental impact and identify inconsistencies and conflicts with the Port's public trust lands/waters doctrine and coastal act responsibilities. In addition to its numerous potential environmental impacts, it would enable a specific development activity that appears to serve a very limited segment of the public, commits 4.5 acres of public trust/coastal lands to a golf ball range outfield (with no public access), and has no coastal-dependent, coastal-oriented, or even coastal-associated purpose.

The NOP identifies numerous potentially significant environmental impacts and concludes that an Environmental Impact Report (EIR) must be prepared. That conclusion is fully justified in light of the plethora of potential impacts, and it is unclear whether most of them can be effectively minimized and fully mitigated. However, the NOP also states: "Future development of adjacent parcels, west of the Topgolf Project site, as a result of the land use designation changing from Industrial Business Park to Commercial Recreation is not known at this time." That statement appears to summarily dismiss the potential environmental ramifications from the land use changes as needing substantive evaluation in the environmental documents. Converting the site from industrial to commercial recreation (predominantly hotel/visitor serving) uses could have vastly different, and likely more intense, consequences on environmental factors (from Aesthetics to Wildfire). Because this project is proceeding under the existing Port Master Plan (PMP) and independently from the PMP Update (PMPU), this NOP and Initial Study should include a requirement that, at a minimum, a "programmatic" level analysis of that land use designation change for the East Harbor Island Subdistrict - as was done for the PMPU. That is in addition to the site-specific Topgolf development project analysis.

Our comments also address issues raised at the project's December 7th Scoping meeting. Pursuant to CEQA (Section 15083 Early Public Consultation), issues that can be raised during scoping include the range of actions, alternatives, and mitigation measures.

Public Trust and Coastal Act Conflicts

A serious flaw in the proposed action is that consistency and conformance with State policies and principles in the Coastal Act and Public Trust Doctrine are not identified as potentially significant impacts, nor are they addressed. As stated on the State Lands Commission website (https://www.slc.ca.gov/public-engagement/): "The public's right to use California's waterways for navigation, fishing, boating, natural habitat protection and other water-oriented activities is protected by the Common Law doctrine of the Public Trust. Historically, the Public Trust has referred to the basic right of the public to use its waterways to engage in "commerce, navigation, and fisheries." More recently, the doctrine has been broadened by various landmark court decisions to include the right to swim, boat, and engage in other forms of water recreation, and even to preserve lands in their natural state in order to protect scenic and wildlife habitat values." and "Uses that do not protect or promote Public Trust values, are not water-dependent or oriented and exclude rather than facilitate public access and use are not consistent with the trust under which the lands are held."

Regarding the Coastal Act (https://www.coastal.ca.gov/laws/) and particularly the Ports section (Chapter 8), several key guiding policies must be addressed. The Coastal Act, Chapter 3 Article 3 (Recreation) emphasizes and focuses on **coastal recreation and water-dependent recreation** (our emphasis); that is, activities which are dependent on the coastal/trust lands and that are not suitable outside of those lands. Additionally, Chapter 8 Article 2 states "All port-related developments shall be located, designed, and constructed so as to:...(c) Give highest priority to the use of existing land space within harbors for port purposes, including, but not limited to, navigational facilities, shipping industries, and necessary support and access facilities.
(d) Provide for other beneficial uses consistent with the public trust, including, but not limited to, recreation and wildlife habitat uses, to the extent feasible."

These policies and guiding principles strongly suggest that a golf driving range is neither coastal-dependent or oriented, would restrict public access, and serves no relevant Port purposes. Therefore, the project as proposed directly conflicts with and will cause significant environmental impacts with regard to the public trust lands and coastal act. It cannot be mitigated and the Port District has no justification for overriding those fundamental policies and principles in an effort to approve the project and amend the Port Master Plan or process it via

the PMPU. We agree that some development on these tidelands may be appropriate, but the proposed project is not reasonable and appropriate. Failure to provide a complete evaluation of these issues and their impacts represents a serious omission in the NOP/IS that must be addressed in the EIR.

Environmental Initial Study Checklist

Project Area and Proposed Project Description

Page 2. The NOP identifies the project area as East Harbor Island (42.98 acres), within which the Topgolf project proposes to utilize 9.37 acres. The project is proposing several land use designation changes/redevelopment and a specific development project. The land use designation requires a PMP Amendment (with an appropriate level of analysis) as well as a project-specific analysis of the Topgolf development. As stated previously, the NOP/IS should include the requirement for a "programmatic" level analysis of the proposed land use designation changes in addition to the project specific level analysis for the Topgolf development proposal.

The sections that evaluate the environmental factors are not consistent in how they evaluate the full "project" - both the land use designation change (PMP Amendment) as well as the specific Topgolf development. For example, the sections on Aesthetics, Air Quality, Energy, GHGs and other factors do not specifically refer to the total project (EHI or East Harbor Island land use designation change and Topgolf), even though the potential impacts from the new land use designation could be extensive and significant. However, other sections specifically reference EHI in toto (e.g., Biological Resources, Geology and Soils, Hydrology and Water Quality, Land Use and Planning). Because this project may precede the PMPU, whose Programmatic EIR does analyze the land use designation change to commercial recreation, this project's EIR must prepare its environmental analyses at the level that is comparable to the PMPU (i.e., the programmatic level analysis) for the general land use designation change. And prepare the project-level analysis for the Topgolf component.

Because the project appears to conflict with the public trust doctrine, which the Port District administers for trust tidelands that are managed in trust for the State Lands Commission, Item

10 of the Information Sheet should add the State Lands Commission as a state agency whose permission (or a finding regarding the Topgolf project's consistency) is required.

Page 11. The list of environmental factors potentially affected strongly suggests that the Topgolf project will have significant impacts. It is doubtful that the possible mitigation measures described in the IS will be able to reduce the impacts to less than significant, particularly for but not limited to Aesthetics, Biological Resources, GHGs and Transportation. Also, because the project would fence-off 4.5 acres of tidelands from general public recreational space, and serve only as a repository for golf balls, this represents a significant loss of potential public open space that should be considered as a significant effect and the IS should check this as a Potentially Significant Impact for "Recreation."

Pages 14-15. Fencing off 4.5 acres of prime coastal tidelands that are adjacent to one of the less developed/constrained shorelines with netting on poles up to 170 feet high would create an unmitigatable visual/scenic impact. The 4.5 acres of turf and target "holes" would have no scenic/visual context to the rest of the adjacent shoreline. Combined with nighttime lighting, those 4.5 acres would add nothing to the coastal tidelands aesthetics, only degrade them.

Also, this section makes no reference to the other aspects of the land use designation changes and their potential impacts. As stated previously, the EIR must evaluate the entirety of the "project", including the general land use designation change – at the programmatic level – as well as the specific Topgolf project at the project-level.

Pages 20-22. The IS correctly identifies that the proposed project could have significant impacts to all of the categories of biological resources. Missing in the brief discussion of potential conflicts with applicable policies protecting biological resources is any reference to the biological resources policies and principles embedded in the public trust doctrine and coastal act, both of which are foundational to the PMP and PMPU. As noted previously, this is a serious omission in the NOP/IS.

Potentially significant impacts to avian species from the Topgolf project would be likely due to entanglement with netting on poles up to 170 feet high; additionally, the presence of powerful lights will attract birds, making the netting even more of a threat. We request that the EIR

collect all relevant studies on netting and lighting on birds and other animals (e.g., bats), including data for all operating Topgolf facilities as part of the bird strike/entanglement/attraction impact analysis. Also, the analysis must identify whether the data sets/studies used appropriate collection and analytical methods.

Page 25. The discussion of impacts to Energy fails to raise or provide any assessment of potential impacts from the EHI land use designation change. The discussion appears only to address potential impacts from the Topgolf project, which is inadequate.

Page 29. Similar to the concern raised in the preceding comment on Energy, this discussion fails to raise or provide any assessment of potential impacts from the EHI land use change impacts on GHGs, which is inadequate.

Pages 30-33. The potential hazards from lighting are not adequately identified. Night lighting of the large outfield would presumably be at both ground level and well-above ground level so that golfers can follow their golf balls. The amount of lighting may pose a distraction and hazard to aircraft that land at the nearby airport runway. The lighting will significantly increase illumination in a relatively non-lighted part of the bay and could also conflict with efforts to lessen “dark sky” impacts.

Pages 33-35. This section identifies many potential impacts to Hydrology and Water Quality from the EHI and Topgolf project. Is the Topgolf’s 4.5 acres of outfield/driving range going to be artificial turf or vegetated/grass? Recent scientific studies of artificial turf have found that it has significant impacts, including release of toxic chemicals and heat absorption, adding to the urban heat effect (https://calmatters.org/environment/2023/10/california-synthetic-turf-pfas/; https://environmentaldefence.ca/2022/03/31/plastic-grass-isnt-green-the-problem-with-artificial-turf/). These issues must be fully evaluated in the EIR.

Page 36. The NOP/IS fails to reference and address public trust doctrine and coastal act policies and principles in regards to the proposed project’s potential impacts to Land Use and Planning. As noted in previous comments, the Topgolf project appears to conflict with those policies and principles because it fails to evaluate consistency with the public trust (tidelands) doctrine/policies, has little relevance to port activities, and is not a coastal-dependent or oriented activity.

Page 43. Locating a golf driving range facility with a 4.5 acre outfield as a Recreational Resource within the coastal zone and public trust tidelands is inconsistent with those land designations. A golf driving range can – and should - be located outside of those lands, which are extremely limited in extent and essential to providing coastal-dependent recreational activities. This issue must be fully evaluated in the EIR.

Page 44. The project, which has been more clearly described in the Board's December 5, 2023 Meeting Agenda (Action Item 1) could create several hundred surface parking spaces and promote more vehicle use at a time when all government and special purpose agencies are working to reduce vehicle use. During the December 5 Board meeting, the project proponents stated that the project could increase visitor use by 500,000. Combined with the "Entertainment Center that is being proposed by the Port, these projects were stated to potentially add 1,000,000 new visitors to the EHI (https://www.sandiegouniontribune.com/business/story/2023-12-05/topgolf-lease-commitment-flagship-san-diego-bay?utm_id=120768&sfmc_id=443565). In an area where traffic/transportation is already greatly compromised, the project will significantly add to an already unsustainable infrastructure system and does not appear to facilitate alternatives to vehicle use.

In addition, the land use change could allow another hotel to be developed on the western side of the project site, with unspecified additional visitor use. The potential for additional impacts on transportation should be included in the programmatic analysis of the land use change.

Pages 51-52. The Mandatory Findings of Significance concludes that the EHI/Topgolf project has potentially significant impacts to numerous environmental factors and that an EIR is required. We fully concur. As stated throughout this comment letter, the NOP/IS fails to raise and adequately discuss conflicts and inconsistencies of the Topgolf project with the public trust doctrine and coastal act. It is also not consistent with the Port District Act as a Port-related activity.

Project Alternatives. Given the significant potential changes associated with the land use designation change and the specific project (Topgolf) and resulting environmental impacts, the

EIR must include a range of reasonable alternatives. Changing the land use designation from industrial to commercial recreational use is consistent with what is proposed in the PMPU. The Topgolf project, as we have shown, poses a multitude of potentially significant environmental impacts, and it is not clear whether those can be avoided or adequately mitigated to less than significant. We request that the EIR include a golfing alternative that removes the 4.5 acre outfield with its netting and lighting and utilizes golf simulators instead of the current driving range. Golf simulators are a highly efficient and effective alternative to the current driving range, allow for real-time feedback on the golfer's swing, and can emulate hundreds of actual golf courses – presumably Topgolf could recreate the San Diego Bay and City of San Diego skyline as one of the virtual images. In addition, we request that as part of that alternative, 4.5 acres of the currently designated adjoining "park/plaza" open space be relocated to the former golf "outfield" area and that a minimum of 4.5 acres of the identified open space be dedicated to natural habitat creation/enhancement (e.g., intertidal beach, wetlands, dune and shoreline upland transitional habitat).

Our contact for this letter is Bill Tippets (billtippets@gmail.com). Please include this comment letter into the project's administrative file and ensure that the EIR fully addresses each of the concerns raised.

Sincerely,

Mike McCoy President, SWIA	Bill Tippets Board Member, SWIA	James A. Peugh Conservation Chair, SD Audubon
Lisa Ross Chair, Sierra Club SD Chapter	Pamela Heatherington Director, ECO SD	Diane Coombs Chair, SD Waterfront Coalition

Cathy Handzel

President, Dark Sky SD Chapter

Cc: SWIA Board

From:	PamO
To:	Megan Hamilton
Subject:	RE: RESUBMIT COMMENTS: REVISED Notice of Preparation of an Environmental Impact Report for the proposed East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment
Date:	Friday, December 15, 2023 8:15:42 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I suggested you add a couple really good mini golf courses. GOOD courses. San Diego is severely lacking!

From: Megan Hamilton <mhamilton@portofsandiego.org>
Sent: Thursday, December 14, 2023 5:03 PM
To: Megan Hamilton <mhamilton@portofsandiego.org>
Subject: RESUBMIT COMMENTS: REVISED Notice of Preparation of an Environmental Impact Report for the proposed East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment

Hello,
We are aware that you submitted comments on the NOP.
Can you please resubmit your comments?
Unfortunately, due to technical issues with the email address we provided, the comments were not received. The problem with the email address has now been fixed.
A Revised NOP extends the comment due date to 5:00pm Tuesday January 16, 2024.
Apologies for the inconvenience!

Megan Hamilton
Senior Planner
Development Services
(619) 380-0765

Email-Logo

connect:

Port administration offices are open Monday-Thursday
and every other Friday from 8am-5pm.

From: info@generation3development.com
To: EHI/Topgolf
Subject: Fwd: Public Comments re NOP
Date: Friday, December 15, 2023 6:40:13 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

-------- Original Message --------

Subject: Public Comments re NOP
Date:2023-12-05 11:24 AM
From:info@generation3development.com
To:EHITopgolf@portofsandiego.org

Attention: Megan Hamilton

Thank you for the opportunity to comment on the Notice of Preparation of the Draft EIR for the Topgolf Project.

I am a live-aboard tenant at Safe Harbor Sunroad Marina, located a few hundred yards across the channel separating the Topgolf site from the marina.

I encourage the Port to consider, and the EIR to address, these concerns:

1. **Light intrusion on the marina:**
2. **target area lighting:** what is the type, height, intensity, orientation and hours of operation of target area lighting? Since the hitting bays are east-facing, are the lights west-facing?
3. **illumination**: signage, canopy edge/ band per figure 3b: Same concerns as item 1 A above.
4. **storefront glazing**: what will be done to reduce the impact of reflected glare from sunlight? Trees / landscaping, for example.
5. **digital screen** 50’ x 30’ figure 3a: does the screen face inward toward the facility or outward toward the marina? What will be projected on the screen? What is the type, height, intensity, orientation and hours of operation of the digital screen?
6. **rooftop entertainment area and sky patio:** what are the operating hours

of these uses? How will these uses be lit?

1. **Noise intrusion on the marina:** the Environmental Initial Study Checklist identifies the environmental impact of noise as "significant" and "excessive" (page 38, 4.13) The NOP identifies overhead speakers, amplified music, a rooftop entertainment area and a sky patio as anticipated features. Please consider whether the facility would have any less appeal, or generate any less income, in the absence of amplified music. Ideally, the project would respect the fact that the location is the waterfront, not the Gaslamp.

1. **Scale of 170' height barrier netting relative to surroundings:** the barrier net is the equivalent of a 17-story building; is completely out of scale with all nearby uses; and is extremely imposing in its visual impact. Given that the average apex (the highest point the ball travels into the air) of Professional Golf Association (PGA) tour players is 100 feet in height, why does the barrier need to be 70% taller in height? There must be a factor of safety less than 70% which would be prudent, given that facility users are unlikely to hit golf balls as high as professionals do.

1. **Impact of other proposed uses:** what is the location of the water-based hand-launched non-motorized watercraft launch area and water-based transfer point? What is a "transfer point"?

1. **Impact on housing:** the Environmental Initial Study Checklist 4.21 Mandatory Findings page 52 indicates "no impact on housing". I encourage the Port to consider, and the EIR to address, the outlook that the nearby boats which marina tenants live aboard are 'housing" whose occupants will be substantially impacted by the concerns above.

Thank you for your consideration of these concerns.

Steve Codraro

619-997-5056

info@generation3development.com

This page intentionally left blank.

DRAFT

Environmental Initial Study Checklist

East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment

November 2023

Prepared for:

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

Prepared by:

600 B Street, Suite 2000
San Diego, California 92101
(619) 236-1778
Ryan Binns, PMP, ENV SP

This page intentionally left blank.

Table of Contents

Section 1 Introduction 1

1.1 Initial Study Information Sheet 1

Section 2 Project Description 9

2.1 Project Description 9

Section 3 Environmental Factors Potentially Affected 11

Section 4 Environmental Initial Study Checklist 13

4.1 Aesthetics 14
4.2 Agriculture and Forestry Resources 16
4.3 Air Quality 18
4.4 Biological Resources 20
4.5 Cultural Resources 23
4.6 Energy 25
4.7 Geology and Soils 26
4.8 Greenhouse Gas Emissions 29
4.9 Hazards and Hazardous Materials 30
4.10 Hydrology and Water Quality 33
4.11 Land Use and Planning 36
4.12 Mineral Resources 37
4.13 Noise 38
4.14 Population and Housing 40
4.15 Public Services 41
4.16 Recreation 43
4.17 Transportation 44
4.18 Tribal Cultural Resources 46
4.19 Utilities and Service Systems 47
4.20 Wildfire 49
4.21 Mandatory Findings of Significance 51

Section 5 References 53

Section 6 California Department of Fish and Wildlife Fee Determination 55

Section 7 Preparers 57

Figures

Figure 1. Regional Location 5
Figure 2. Project Area 7

This page intentionally left blank.

Acronyms and Abbreviations

CEQA	California Environmental Quality Act
District	San Diego Unified Port District
EHI	East Harbor Island
EIR	Environmental Impact Report
FHSZ	Fire Hazard Safety Zone
GHG	greenhouse gas
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NASNI	Naval Air Station North Island
PM_{10}	particulate matter of 10 microns in diameter or smaller
$PM_{2.5}$	particulate matter of 2.5 microns in diameter or smaller
PMP	Port Master Plan
PMPA	Port Master Plan Amendment
PMPU	Port Master Plan Update
Project	East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment
SDIA	San Diego International Airport
VHFHSZ	Very High Fire Hazard Severity Zone

This page intentionally left blank.

Section 1 Introduction

This Environmental Initial Study Checklist addresses the environmental impacts associated with the implementation of the proposed East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment (Project). This Environmental Initial Study Checklist has been prepared in accordance with the California Environmental Quality Act of 1970 (CEQA), as amended, the CEQA Guidelines, and the San Diego Unified Port District's (District's) CEQA Guidelines.

1.1 Initial Study Information Sheet

1. Project title:

East Harbor Island Redevelopment/Topgolf Project and Port Master Plan Amendment

2. Lead agency name and address:

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

3. Contact person and phone number:

Megan Hamilton
Senior Planner, Development Services Department
(619) 380-0765

4. Project location:

East Harbor Island, San Diego, California

5. Project Applicant's and Proponent's name and address:

Topgolf, USA (Topgolf), 8750 North Central Expressway, Suite 1200, Dallas, Texas, 75231; Avis Rent A Car System, LLC (Avis), 15820 Internaional Boulevard, Tukwila, Washington, 98188; Enterprise Mobility (Enterprise), 333 City Boulevard West, Suite 1115, Orange, California, 92868; The Hertz Corporation (Hertz), 8501 Williams Road, Estero, Florida, 33928; and the District, 3165 Pacific Highway, San Diego, California, 92101

6. Port Master Plan designations:

Land Use: Industrial Business Park, Open Space, Harbor Services

7. Zoning designation:

Pursuant to Section 19 of the Port Act, zoning does not apply within the District's jurisdiction.

8. Description of Project:

Please see Section 2, Project Description, for a detailed description of the Project, as well as the Project Description Summary in the Project's Notice of Preparation of a Draft Environmental Impact Report.

9. Surrounding Land Uses and Setting:

The Project area is approximately 43 acres of land generally bounded to the north by North Harbor Drive and the San Diego International Airport (SDIA), to the west by Harbor Island Drive, to the south by Liberator Way and the East Basin portion of San Diego Bay, and to the east by the Convair Lagoon portion of San Diego Bay (Figure 1, Regional Location, and Figure 2, Project Area).

The Project area is currently occupied by the San Diego Harbor Police headquarters; Avis, Enterprise, and Hertz rental car companies; and SDIA. Existing structures include several one- and two-story buildings, various shade structures, parking lots, fencing, and walkway pavement. Much of the Project area's shoreline is covered with riprap. Topographically, the East Harbor Island (EHI) redevelopment area is relatively level with a gentle gradient down to San Diego Bay.

The Project area is within the East Harbor Island Subdistrict of Planning District 2 of the Port Master Plan (PMP). The existing land use designation for the Project site is Industrial Business Park (and a small amount of Open Space and Harbor Services), which permits a range of industrial and business uses sited in developments that emphasize clustering of buildings, extensive landscaping, and shared open space.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

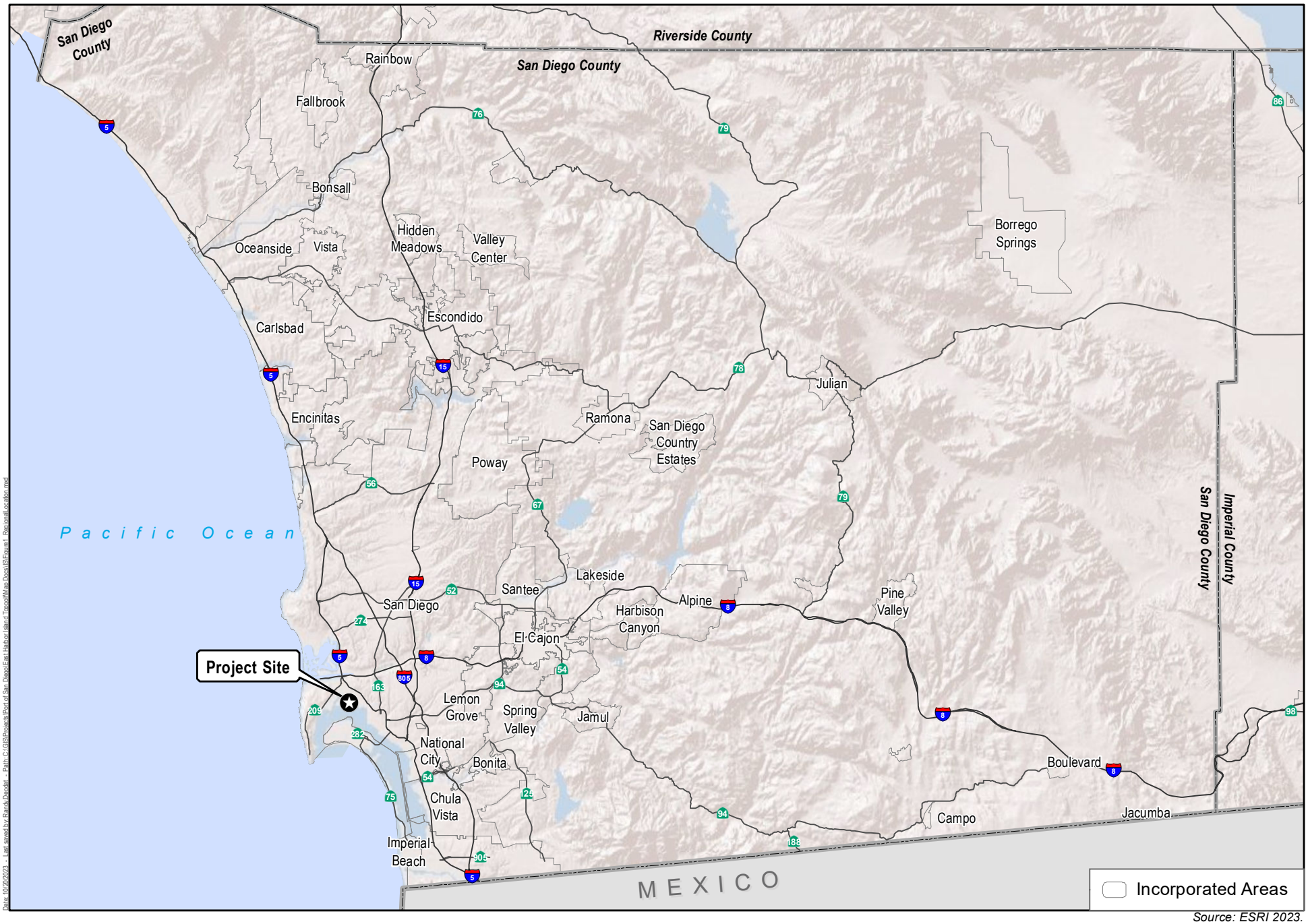
California Coastal Commission
Federal Aviation Administration
City of San Diego

11. Have California Native American Tribes traditionally and culturally affiliated with the Project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has this consultation begun?

Pursuant to California Public Resources Code, Section 21080.3.1 (Assembly Bill 52), California Native American Tribes traditionally and culturally affiliated with a project site

can request notification of projects in their traditional cultural territory. At this time, no Native American Tribes have requested consultation for projects subject to CEQA within the District's jurisdiction. However, in accordance with Assembly Bill 52, formal Tribal consultation will be conducted for the Project.

This page intentionally left blank.



Source: ESRI 2023.

Harris & Associates

N

0 5 10

Miles

Figure 1

Regional Location

East Harbor Island Redevelopment/Topgolf Project

This page intentionally left blank.



Path: C:\GIS\Projects\City of Perris\Perris Valley Industrial Project\Map Docs\NOP

Source: Port of San Diego 2023.

Harris & Associates

N

0 375 750

Feet

Figure 2

Project Area

East Harbor Island Redevelopment/Topgolf Project

This page intentionally left blank.

Section 2 Project Description

2.1 Project Description

The Project would redevelop portions of East Harbor Island. Project components include a Port Master Plan Amendment (PMPA), demolition and removal of existing structures and improvements, realignment of Liberator Way, redevelopment of approximately 10 acres for the Topgolf entertainment complex, public realm improvements, and future redevelopment of adjacent parcels. The existing San Diego Harbor Police headquarters located on the western side of East Harbor Island would remain in place. A PMPA would be required to change the land use designation of the Project area from Industrial Business Park, Open Space, and Harbor Services to Commercial Recreation and Park/Plaza to allow for overnight accommodation uses including hotels, restaurants, a convention center, recreational vehicle parks, specialty shopping, pleasure craft marinas, water-dependent educational and recreational program facilities and activities, dock and dine facilities, and sportfishing, as well as an array of active and passive recreational uses, including a shoreline promenade, and to add the East Harbor Island Redevelopment/Topgolf Project to the PMP's Project List for Planning District 2 per Section 30711 of the California Coastal Act. For complete Project details, please refer to the Project Description Summary in the Notice of Preparation for the Project.

This page intentionally left blank.

Section 3 Environmental Factors Potentially Affected

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

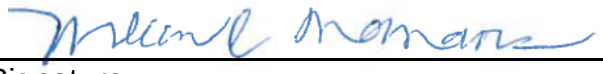
☒Aesthetics	☐ Agriculture/Forestry Resources	☒ Air Quality
☒ Biological Resources	☐ Cultural Resources	☒ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☒ Hydrology/Water Quality	☒ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☒ Public Services
☐ Recreation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

On the basis of this initial evaluation:

- ☐ I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the Project MAY have a significant effect on the environment, and an environmental impact report is required.

☐ I find that the Project MAY have a "potential impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.



Signature

November 17, 2023
Date

Wileen C. Manaois
Director, Development Services

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

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

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

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

4.1 Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☒	☐	☐	☐
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☒	☐	☐	☐
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☒	☐	☐	☐

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

Potentially Significant Impact. The Project proposes the construction of a Topgolf entertainment complex and the redevelopment of adjacent parcels, which may impact views of scenic vistas. The Project is located in the East Basin Industrial Subarea of the certified PMP Planning District 2 (Harbor Island/Lindbergh Field) adjacent to the San Diego Bay and in the Draft Port Master Plan Update (PMPU) Planning District 2, Harbor Island, East Harbor Island Subdistrict, which identify scenic vistas. The new Topgolf entertainment complex and associated facilities could have a potential impact on existing views. Project elements that would have the potential to create view impacts include the Topgolf entertainment complex, including the outfield netting and poles that would extend up to 170 feet. Visual simulations will be prepared to assess the potential visual impact of the Topgolf entertainment complex component. Visual simulations will be prepared, and further analysis will be provided in the EIR.

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

Potentially Significant Impact. State Route 163 is designated as a state scenic highway and is located approximately 3 miles to the east of the Project area. In addition, the San Diego–Coronado Bay Bridge (State Route 75) is a California State-designated scenic highway and is located approximately 3.2 miles southeast of the Project area. The EHI redevelopment has the potential to damage scenic resources. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. Implementation of the Project could conflict with applicable regulations that govern scenic quality and affect the visual character of the area. The Project's current land use designation under the PMP is Industrial Business Park, Open Space, and Harbor Services. The Project would require a PMPA to change the land use designation to Commercial Recreation and Park/Plaza. Under the Draft PMPU, the Project's proposed land use designations would be Commercial Recreation, Institutional/Roadway, and Recreation Open Space. Further analysis will be provided to discuss the land use designation changes under the existing PMP and Draft PMPU in the EIR.

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

Potentially Significant Impact. The Topgolf entertainment complex's proposed nighttime operation hours and lights could create a new source of substantial light or glare that would affect day and nighttime views in the area. A lighting plan will be prepared to evaluate the Topgolf Project's potential to result in impacts related to light trespass and glare. Therefore, further analysis will be provided in the EIR.

4.2 Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

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

No Impact. According to the California Department of Conservation's San Diego County Important Farmland Finder, the Project area is classified as "Urban and Built-Up Land," which does not contain agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2023a). There is no potential for any actions to convert Farmland resources to non-agricultural uses. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. The Project area is not zoned for agricultural use, nor is there a Williamson Act contract for the site (DOC 2023b). Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. The Project area is classified as "Urban and Built-Up Land" and is not zoned as forest land, timberlands, or timberland zoned Timberland Production (DOC 2023a). No land that has been zoned as forest land or timberland exists within the boundaries of the Project site. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. As discussed under question 4.2(c), no land that has been zoned as forest land or timberland exists within the boundaries of the Project. Implementation of any of the Project elements would not result in a loss of forest land or the conversion of forest land to other uses. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. See question 4.2(a). Implementation of the Project would have no impact on agriculture and/or forestry resources. No agricultural land, forest land, or timberland exists on or in the vicinity of the Project area. The Project would not involve changes to the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

4.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard)?	☒	☐	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☒	☐	☐	☐

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

Potentially Significant Impact. Pursuant to the federal and state Clean Air Acts, the San Diego County Air Pollution Control District is required to reduce emissions of criteria pollutants for which San Diego County is in non-attainment (i.e., ozone, particulate matter of 10 microns in diameter or smaller [PM_{10}], and particulate matter of 2.5 microns in diameter or smaller [$PM_{2.5}$]). The Regional Air Quality Strategy projects future emissions and determines the strategies necessary for the reduction of stationary source emissions through regulatory controls to attain the California Ambient Air Quality Standards for ozone. The federal Clean Air Act also mandates that the state submit and implement a State Implementation Plan for local areas not meeting those standards. California Air Resources Board mobile source emission projections and San Diego Association of Governments growth projections are based on population and vehicle trends and land use plans developed by local agencies. Construction and operation activities associated with the implementation of the Project may conflict with the Regional Air Quality Strategy and State Implementation Plan and might have a potentially significant impact on air quality because emissions would exceed those estimated for the existing PMP and Draft PMPU. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. The San Diego Air Basin is in non-attainment status for ozone (8-hour standard) at the federal and state level, and for ozone (1-hour standard), PM_{10}, and $PM_{2.5}$ at the state level. Implementation of the Project could result in a cumulatively

considerable net increase in these criteria pollutants. Therefore, further analysis will be provided in the EIR.

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

Potentially Significant Impact. Sensitive receptors include land uses where exposure to pollutants could result in health-related risks to individuals more susceptible to air pollution, such as children, older adults, and individuals with a pre-existing respiratory illness and/or cardiovascular disease. Residential dwellings, schools, hospitals, playgrounds, and similar facilities are of primary concern because of the presence of individuals particularly sensitive to pollutants and the potential for increased and prolonged exposure of individuals to pollutants. Construction and operational activities associated with the Project may have the potential to expose nearby sensitive receptors, including the Sunroad Resort Marina directly south, to substantial pollutant concentrations. Therefore, further analysis will be provided in the EIR.

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

Potentially Significant Impact. According to the California Air Resources Board's Air Quality and Land Use Handbook (CARB 2005), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not include any uses identified by the California Air Resources Board as being associated with odors. However, odors may be generated from vehicles and equipment exhaust emissions. Therefore, this topic will be analyzed further in the EIR.

4.4 Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☒	☐	☐	☐
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☒	☐	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☒	☐	☐	☐
e. Conflict with any applicable policies protecting biological resources?	☒	☐	☐	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?	☒	☐	☐	☐

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

Potentially Significant Impact. Construction and operation activities of the EHI redevelopment area could result in a significant impact on special status species and upland habitat. To evaluate the Project's impacts to upland biological resources, a Biological Technical Report will be prepared in accordance with the standards of the District. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. Refer to question 4.4(a). The Project may impact identified sensitive natural communities. A Biological Technical Report and further analysis will be included in the EIR.

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

Potentially Significant Impact. The Project work assumes that some modifications of locations and capacity of storm drains would occur and that some shoreline access needs may be accommodated along the EHI redevelopment shoreline environment. The regulatory boundaries under the Clean Water Act and Rivers & Harbors Act will be identified to quantify federally regulated fills. Therefore, the Project may impact protected wetlands. Further analysis will be included in the EIR.

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

Potentially Significant Impact. The Project may impact the movement of wildlife species. The EHI redevelopment area is located within San Diego Bay, which falls within the Pacific Flyway, a major route of movement for millions of migratory birds. Additionally, a least tern nesting site is within 0.5 mile of the EHI redevelopment area. The Topgolf Project proposes to install a safety netting system with poles up to 170 feet in height, which could result in potential impacts to locally breeding and migratory birds. Further analysis will be included in the EIR.

e. Would the project conflict with any applicable policies protecting biological resources?

Potentially Significant Impact. The applicable local land use plans, policies, ordinances, or regulations of the District, adopted for the purpose of protecting biological resources, are the PMP, Draft PMPU, and San Diego Bay Integrated Natural Resources Management Plan related to upland habitat. Additionally, the District has established goals to protect, preserve, and enhance natural resources in San Diego Bay in Section II of the PMP, Planning Goals (Goal XI). The Project is located within the District's PMP Planning District 2. The PMP's conservation policies focus on protecting and restoring functional areas of high ecological value, none of which are located on or adjacent to the Project area. Additionally, the Project would comply with the Draft PMPU's policies related to safeguarding natural resources, specifically from Chapter 3.3, Ecology Element, and

related policies, including Policies 1.1.2 and 1.1.3 related to the protection of sensitive species. However, the Project has the potential to result in significant impacts on biological resources of the San Diego Bay. Therefore, the Project would potentially conflict with local policies or ordinances protecting biological resources. Further analysis will be provided in the EIR.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other applicable habitat conservation plan?

Potentially Significant Impact. As discussed above in Section 4.4(e), the Project has the potential to conflict with the District's plans, policies, ordinances, or regulations for the protection of biological resources. Therefore, further analysis will be provided in the EIR.

4.5 Cultural Resources

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

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

Less than Significant Impact. The Project site includes several one- and two-story buildings associated with the San Diego Harbor Police, rental car companies, and SDIA. The Project would result in the demolition of the Hertz, Enterprise, and Avis car rental facilities and the SDIA facilities. The San Diego Harbor Police headquarters is over 45 years old but will remain in place. The proposed realignment of Liberator Way would occur near the San Diego Harbor Police headquarters but will not hinder views of or impact the San Diego Harbor Police headquarters. The proposed rental car and SDIA facilities were determined to be less than 45 years old and would not be eligible as historical resources meeting the requirements for the California Register for Historic Resources and as defined by CEQA Guidelines, Section 15064.5. All structures to be demolished are less than 45 years old. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

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

Less than Significant Impact. The Project area is on Harbor Island, which was created in 1961 from harbor dredging and was developed shortly thereafter. Although archaeological sites are known to exist in greater San Diego County, no known archaeological resources exist on the Project area. Because Harbor Island is human-made, the possibility that archaeological sites exist is alleviated. Because the Project area is on dredged fill, there is very little to no potential for archaeological resources to be unearthed during construction activities. Therefore, impacts to archaeological resources would be less than significant, and no further discussion is warranted in the EIR.

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

Less than Significant Impact. There are no known cemeteries or burials on the Project area or within the immediate vicinity. Because the Project area is on dredged fill, there is very little to no potential to encounter buried human remains or unknown cemeteries in areas with little or no previous disturbance. In the unlikely event that human remains are found, the Project would follow proper procedures outlined in California Health and Safety Code, Section 7050.5, and CEQA Guidelines, Section 15064.5(e). No further discussion is warranted in the EIR.

4.6 Energy

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

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

Potentially Significant Impact. Implementation of the Project would result in energy consumption during construction and operation. Project demolition and construction would primarily consume diesel fuel through operation of heavy-duty construction equipment and debris hauling; gasoline associated with worker commutes; and minor amounts of electricity associated with operation of electrically powered construction equipment. Operation would create additional demands for fuel, electricity, and natural gas compared to existing conditions. An Energy Technical Memorandum will be prepared for the purpose of summarizing the potential energy use impacts related to the Project and to assess whether the Project would result in a wasteful consumption of energy. Further analysis will be included in the EIR.

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

Potentially Significant Impact. State and local renewable energy and energy efficiency plans that are applicable to the Project include California Title 24 Energy Efficiency Standards; the State of California Energy Action Plan, which contains required standards related to energy efficiency for buildings and renewable energy development; the District's Climate Action Plan, which includes strategies to reduce greenhouse gas (GHG) emissions; and San Diego Association of Government's Regional Energy Strategy, which establishes long-term energy goals in the region through 2050, including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. The Project's energy demand would be compared to the existing energy demand and to the District and state energy use reduction plans. Further analysis will be included in the EIR.

4.7 Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☒	☐	☐	☐
ii. Strong seismic ground shaking?	☒	☐	☐	☐
iii. Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Potentially Significant Impact. The Project area is located in a seismically active region of Southern California. The Elsinore, San Jacinto, and San Andreas Faults are active fault systems located northeast of the Project. The Coronado Bank, San Diego Trough, and San Clemente Faults are active faults located west of the Project. A strand of the Rose Canyon Fault Zone, the nearest active fault system, is mapped as traversing the eastern

portion of the Project area. There is a potential for ground surface rupture due to faulting at the Project area. In addition, lurching or cracking of the ground surface adjacent to the Project area because of nearby seismic events is possible. Further analysis will be discussed in the EIR

ii. Strong seismic ground shaking?

Potentially Significant Impact. As with all properties in the seismically active Southern California region, the Project area would be susceptible to ground shaking produced by local faults during earthquakes. Refer to question 4.7(a)(i). Further analysis will be included in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. The Project area has a high potential for liquefaction and seismically induced settlement based on the presence of shallow groundwater and underlying loose, unconsolidated sediments. Further analysis will be included in the EIR.

iv. Landslides?

Less than Significant Impact. Geologic mapping does not indicate the presence of mapped landslides on the Project area. Additionally, landslides were not observed on or adjacent to the Project area. Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Impacts would be less than significant, and no further discussion is warranted in the EIR.

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

Potentially Significant Impact. Implementation of the Project could have the potential to expose topsoil to erosion from water or wind resulting from construction or operational activities. Further analysis will be included in the EIR.

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

Potentially Significant Impact. The Project area is within an area mapped as being least susceptible to landslides. Additionally, based on the relatively flat topography of the Project area, landslides are not anticipated to impact the Project. However, there is high potential for liquefaction, seismically induced settlement, and lateral spreading at the Project area due to the shallow groundwater table, proximity to San Diego Bay, and the low density of the underlying granular subsurface materials. Further analysis will be included in the EIR.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Soils underlying the Project area are generally anticipated to consist of fill materials, bay deposits (also referred to as offshore marine deposits), and old paralic deposits. Implementation of the Project could adversely impact expansive soils. Further analysis of the Project's impacts will be included in the EIR.

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

No Impact. The Project would rely on the existing sanitary system and would not use septic tanks or alternative wastewater disposal systems. Further analysis is not warranted in the EIR.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. A geologic field reconnaissance of the EHI redevelopment area will be completed, as well as review of existing geotechnical reports to determine if any unique paleontological resources or unique geological features exist in the vicinity and therefore may be impacted. Further analysis will be included in the EIR.

4.8 Greenhouse Gas Emissions

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

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

Potentially Significant Impact. Implementation of the Project would generate GHG emissions, primarily associated with off- and on-road equipment use during construction activities and emissions generated by vehicular traffic and energy use, water use, and solid waste management practices during operation. GHG emissions from construction and operation activities could potentially, either directly or indirectly, have a significant impact on the environment. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. The District has enacted a variety of policies and plans to reduce GHG emissions as part of its Climate Action Plan, including the implementation of shore power, equipment and truck replacement/retrofits, vessel speed reductions, and the Clean Truck Program. Implementation of the Project could increase GHG emissions, which may conflict with plans, policies, or regulations that serve to reduce GHG emissions. Further analysis will be included in the EIR.

4.9 Hazards and Hazardous Materials

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

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

Potentially Significant Impact. The Project would use heavy equipment for construction activities. Construction-related hazardous materials would be used during Project construction, including fuel, solvents, paints, oils, and grease. Operation-related hazardous materials could include fuels, oils and lubricants, solvents and cleaners, and paints and thinners, which are all commonly used in the proposed land uses. The routine use or an accidental spill of hazardous materials could result in inadvertent releases, which could adversely affect workers, the public, and the environment during construction and operational activities. During construction activities, there is also the potential for hazardous materials to be identified during demolition, excavation, and grading activities throughout the EHI redevelopment area. Extensive demolition would occur with the three

rental car facilities, Hertz, Enterprise, and Avis, the SDIA facility, and the existing Liberator Way with the potential to encounter hazardous materials and hazardous soils. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. The Project would include the demolition of three rental car facilities, Hertz, Enterprise, and Avis, the SDIA facility, and the existing Liberator Way, including all associated underground and aboveground storage tanks. The presence of hazardous materials could create a significant hazard to the public or the environment if the hazardous materials were to be disrupted during demolition activities and released into the environment. Therefore, further analysis is warranted in the EIR.

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

Less than Significant Impact. No existing public schools have been identified within one-quarter mile of the Project area. The closest school to the Project area is High Tech Elementary School, approximately 2.6 miles to the west. As such, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

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

Potentially Significant Impact. The EHI redevelopment area may be located within a list of hazardous materials sites compiled pursuant to California Government Code, Section 65962.5. During demolition, construction and operational activities, the public could be exposed to significant hazards that would result in a potentially significant impact. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. The Project area is located within 2 miles of the SDIA and within the Airport Influence Area Review Area 1, which is the combination of the 60-decibel community noise equivalent level noise contour, the outer boundary of all safety zones, and the threshold siting surfaces. The Project area is located within the 60- to 65-

decibel noise contour area and is not located in the safety compatibility zone. If during construction and operational activities, people working in the area were exposed to excessive noise limits, this would result in a potentially significant impact. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. Development of the EHI redevelopment area could result in a change to emergency access, which could impair an adopted emergency response plan or emergency evacuation plan. Construction could result in the temporary closures of public roadways or driveways within City or District jurisdiction. Further analysis will be provided in the EIR.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less than Significant Impact. According to California Department of Forestry and Fire Protection's Fire Hazard Safety Zone (FHSZ) Map of San Diego County (CAL FIRE 2009), the Project is located in a local responsibility non-very high FHSZ. Compliance with all applicable existing laws, regulations, and policies would ensure that impacts associated with wildland fires remain less than significant. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

4.10 Hydrology and Water Quality

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

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Potentially Significant Impact. The Project would have the potential to result in substantial additional sources of polluted runoff, which could have short-term impacts on surface water quality through Project activities such as demolition, clearing, and grading or long-term impacts associated with Project operation.

The EHI redevelopment would involve various types of equipment such as bulldozers, scrapers, backhoes, and other earthmoving equipment; haul trucks; and generators. Pollutants associated with these construction activities that could result in water quality impacts include soils/sediment, debris, fuels, and other fluids associated with the equipment used for construction. The Project would also alter the current landscape through the addition of a Topgolf entertainment complex and other associated facilities,

operation of which has the potential to affect water quality and cause pollutants to be discharged off site.

These pollutants could impact water quality if they are washed off site by stormwater or non-stormwater or are blown or tracked off site to areas susceptible to wash off by stormwater or non-stormwater. Therefore, implementation of the Project could result in significant short-term impacts to water quality from uncontrolled sediment and pollutants in stormwater runoff from construction. A Drainage Memorandum will be prepared for the Project. and further analysis is warranted in the EIR.

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

Potentially Significant Impact. A Drainage Memorandum will be prepared to evaluate the EHI redevelopment's impact on groundwater supplies. Refer to question 4.10(a). Further analysis will be included in the EIR.

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

i. Result in substantial erosion or siltation on or offsite?

Potentially Significant Impact. Implementation of the EHI redevelopment would have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in siltation and/or erosion. Further analysis will be included in the EIR.

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

Potentially Significant Impact. Implementation of the EHI redevelopment would have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could result in flooding on or off site. Further analysis will be included in the EIR.

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

Potentially Significant Impact. Implementation of the EHI redevelopment would have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or a change in

drainage patterns could exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Further analysis will be included in the EIR.

iv. Impede or redirect flood flows?

Potentially Significant Impact. Implementation of the EHI redevelopment would have the potential to change surface runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns. An increase in the volume or rate of runoff or change in drainage patterns could impede or redirect flood flows. Further analysis will be included in the EIR.

d. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Potentially Significant Impact. Tsunamis are seismic sea waves generated by sudden movements of the sea floor caused by submarine earthquakes, landslides, or volcanic activity. Based on the Tsunami Inundation Map for the Point Loma Quadrangle (California Emergency Management Agency 2009), the southern boundary of the Project area is within a mapped tsunami inundation area. During construction, if the site were hit by a tsunami, there would be risk for the release of pollutants from the EHI redevelopment area. Therefore, further discussion is warranted in the EIR.

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

Potentially Significant Impact. The Project is located within the San Diego Bay Watershed Management Area. Specifically, the Project is located in the Pueblo Hydrologic Unit and is further located within the San Diego Mesa Hydrologic Area (SDRWQCB 2016). The major receiving water for the Project is the San Diego Bay.

Pollutants associated with construction and operational activities could result in water quality impacts. Implementation could result in significant short-term and long-term impacts to water quality from uncontrolled sediment and pollutants in stormwater runoff that could conflict with the policies of the San Diego Basin Plan. Therefore, further discussion is warranted in the EIR.

The Project is not located within a Groundwater Sustainability Agency Boundary, and therefore no sustainable groundwater management plan has been prepared for the Project. In addition, no groundwater would be withdrawn as part of the Project. Therefore, no impact would occur, and no further discussion is warranted in the EIR relevant to a sustainable groundwater management plan.

4.11 Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
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?	☒	☐	☐	☐

a. Would the project physically divide an established community?

No Impact. The EHI redevelopment area is currently developed with three rental car facilities, an SDIA facility, and Liberator Way. No component of the Project would introduce a barrier or division to, or otherwise result in a conflict with, the surrounding commercial or industrial development or any other established community. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

Potentially Significant Impact. The Project would require a PMPA to change the land use designation from Industrial Business Park, Open Space, and Harbor Services to Commercial Recreation and Park/Plaza. Further analysis will be included in the EIR.

The District is in the process of updating the PMP and has circulated a Draft PMPU and Draft Program EIR (PMPU Draft PEIR) for public review and comment. The District anticipates seeking certification of the PMPU Final PEIR and approval of the PMPU in 2024. If the PMPU is certified by the California Coastal Commission prior to approval of the Project, no PMPA would be required. The EIR will analyze the Project's consistency with both the existing PMP and the Draft PMPU.

In addition, the EIR will consider the physical effects of climate change on the Project, including an analysis on sea level rise. The sea level rise analysis will identify any areas of potential impacts due to potential future increases in mean sea level rise (temporary coastal flooding and permanent inundation) and whether the Project would exacerbate potential impacts on the environment resulting from sea level rise or associated events (e.g., coastal flooding, wave overtopping, erosion). Further analysis will be included in the EIR.

4.12 Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project area is not known to contain mineral resources that would be of value to the region or state. According to the Conservation Element of the City of San Diego's General Plan (City of San Diego 2008), the Project area is mapped as an area where no mineral deposits are present. No mineral resources would be lost as a result of the Project. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

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

No Impact. The Project area is not known to contain mineral resources that would be of value to the region or state. According to the Conservation Element of the City of San Diego's General Plan (City of San Diego 2008), the Project area is mapped as an area where no mineral deposits are present. No mineral resources would be lost as a result of the Project. Therefore, no impact would occur, and no further discussion is warranted in the EIR.

4.13 Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	☒	☐	☐	☐

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. The potential exists for the EHI redevelopment to result in significant noise impacts due to the proposed high-intensity construction activities, as well as noise emitted during operation such as active recreational uses, amplified music, and stationary sources, including heating, ventilation, and air conditioning equipment. Noise levels during EHI redevelopment construction and operation will be analyzed in the EIR. Further analysis will be included in the EIR.

b. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. The EHI redevelopment involves construction of new structures, demolition of existing structures, public realm improvements, and realignment of Liberator Way, which may cause excessive groundborne vibration. Project demolition and construction would have the potential to generate or expose persons and buildings to excessive groundborne vibration or groundborne noise in excess of established local or regional noise standards. Further analysis will be included in the EIR.

c. Would the project, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact. The Project area is located within 2 miles of the SDIA and Naval Air Station North Island (NASNI). However, the Project is not within the Overflight Notification Area Boundary or noise contours for the NASNI (SDCRAA 2020). Airport Influence Area boundaries around the SDIA have been adopted by San Diego County Regional Airport Authority in its Airport Land Use Compatibility Plan). The EHI redevelopment area is located within the Airport Influence Area Review Area 1, which is the combination of the 60-decibel community noise equivalent level noise contour, the outer boundary of all safety zones, and the threshold siting surfaces. The EHI redevelopment area is located within the 60- to 65-decibel noise contour area and is not located in the safety compatibility zone. During construction and operation, people could be exposed to excessive noise limits, which would result in a potentially significant impact. Further analysis will be provided in the EIR.

4.14 Population and Housing

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

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

No Impact. The Project does not include the addition of residential land uses and would not involve development that would directly or indirectly induce substantial population growth. In addition, the Project does not include the extension of roads or other infrastructure that would indirectly induce substantial population growth. Therefore, no impacts would occur, and no further discussion is warranted in the EIR.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project is located on the waterfront of San Diego Bay. There are no residences located within the vicinity of the Project that would be displaced. Therefore, no impacts would occur, and no further discussion is warranted in the EIR.

4.15 Public Services

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

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

Fire protection?

Potentially Significant Impact. Fire protection services are provided to the Project area by the San Diego Fire–Rescue Department Station 8 on 3974 Goldfinch Street, which is located 3.6 miles to the east. The EHI redevelopment proposes the demolition of surrounding structures and construction of a Topgolf entertainment complex, realignment of Liberator Way, and public realm improvements. This would result in an increase in operational capacity and number of employees. Therefore, the EHI redevelopment would increase demand for fire protection. Further analysis is warranted in the EIR.

Police protection?

Potentially Significant Impact. Law enforcement services are provided to the Project area by the Port of San Diego Harbor Police Department (land- and water-based police services) and the City of San Diego Police Department (land-based police services only). The Harbor Police are headquartered on 3380 North Harbor Drive, located in the northwest corner of the Project area. The closest City police station is the City of San Diego Police Department Police headquarters at 1401 Broadway, approximately 2.1 miles southeast of the Project area. The Project proposes redevelopment that would result in an increase

in operational capacity and number of employees using the site. Therefore, the EHI redevelopment would increase demand for police protection. Further analysis is warranted in the EIR.

Schools?

Less than Significant Impact. The Project would not create the demand for new school facilities. The Project does not include residential land uses and would not increase demand on schools. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

Parks?

Less than Significant Impact. The Project does not involve the construction of housing units that would create the demand for new public parks. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

Other public facilities?

Less than Significant Impact. The Project involves demolition of existing structures, realignment of Liberator Way, construction of a Topgolf entertainment complex, and public realm improvements, which would not create new demand for new public facilities. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

4.16 Recreation

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

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

Less than Significant Impact. The Project includes the construction of a Topgolf entertainment complex and public realm improvements, which would not result in the increased use or deterioration of existing public parks or recreational facilities. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less than Significant Impact. The Project does include recreational facilities. However, the Project is not a residential project that requires recreational facilities or necessitates the expansion of existing facilities. Therefore, impacts would be less than significant, and no further discussion is warranted in the EIR.

4.17 Transportation

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

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Potentially Significant Impact. The Project involves construction of a Topgolf entertainment complex, which would increase operational capacity and the number of employees in the Project area. The increase in traffic generated by the Topgolf Project could conflict with a program plan, ordinance, or policy addressing the circulation system. A Transportation Impact Study, Circulation and Parking Analysis, and a Local Mobility Analysis will be prepared. Further analysis will be included in the EIR.

b. Would the project or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. The Project involves construction of facilities, including a Topgolf entertainment complex, which would increase operational capacity and the number of employees. The increase in number of workers and visitors to the area during construction and operational activities, may result in a net increase in vehicle-miles traveled, which could be inconsistent with CEQA Guidelines, Section 15064.3(b). Further analysis will be included in the EIR.

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

Potentially Significant Impact. The Project involves the realignment of Liberator Way. A Circulation and Parking Analysis will be prepared to determine potential traffic hazards. Further analysis will be included in the EIR.

d. Would the project result in inadequate emergency access?

Potentially Significant Impact. Inadequate emergency access and egress can occur as a result of an incomplete or not fully interconnected roadway network, such as inadequate roadway widths, turning radii, dead-end or gated roads, one-way roads, single ingress and egress routes, or other factors. The Project involves the realignment of Liberator Way and the construction of Topgolf Project access driveways and internal circulation roads, which could impact access to emergency vehicles. In addition, implementation of the EHI redevelopment could have the potential to require lane or roadway closures during construction. Lane and roadway closures have the potential to limit emergency access to the Project area and/or existing development adjacent to the lane or roadway closure. Future development construction activities are required to provide notification to the Fire Marshal. The EHI redevelopment site plan, circulation network, and planned mobility facilities will be evaluated to determine if additional enhancements are necessary. Further analysis will be included in the EIR.

4.18 Tribal Cultural Resources

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

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

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

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

Potentially Significant Impact. A record search will be conducted during the EIR process to determine if any Tribal Cultural Resources are present within the Project area. Consultation with California Native American Tribes will be conducted during the EIR process. Therefore, further analysis will be provided in the EIR.

4.19 Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☒	☐	☐	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☒	☐	☐	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☒	☐	☐	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☒	☐	☐	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☒	☐	☐	☐

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. The EHI redevelopment would require connections to the existing water supply system, wastewater infrastructure, and existing stormwater infrastructure. Implementation may require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities to meet future demands, which could cause significant environmental effects. Therefore, further analysis will be provided in the EIR.

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

Potentially Significant Impact. The EHI redevelopment would result in an increase in water usage compared to the existing conditions. Further analysis will be provided in the EIR.

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

Potentially Significant Impact. The EHI redevelopment would result in an increase in wastewater generation over existing conditions. Further analysis will be provided in the EIR.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Potentially Significant Impact. Construction of the EHI redevelopment would require removal or demolition of existing structures and disposal of the subsequent debris. Non-hazardous construction trash and debris are anticipated to be sent to approved recycling facilities in accordance with the applicable local regulations and ordinances, such as the City of San Diego's Recycling Ordinance and Construction and Demolition Debris Deposit Ordinance, which requires recycling of a minimum of 65 percent of the construction waste generated for projects. Remaining non-hazardous construction trash and debris are anticipated to be disposed of at local landfills that have capacity in San Diego County. If generated, Resource Conservation and Recovery Act and non-Resource Conservation and Recovery Act hazardous waste would be transported under a waste manifest to an authorized hazardous waste Treatment, Storage, and Disposal Facility.

Operation of the EHI redevelopment is anticipated to result in new land uses and activities that would increase the total waste stream from that currently being generated. Therefore, impacts associated with solid waste could be potentially significant. The EIR would analyze the amount of solid waste anticipated to be generated during construction and operation of the EHI redevelopment in comparison to existing landfill facility capacity. Further analysis will be provided in the EIR.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact. The EHI redevelopment would result in an intensification of land uses that would generate solid waste during the demolition, construction, and operational phases. Therefore, impacts associated with solid waste could be potentially significant. Further analysis will be provided in the EIR.

4.20 Wildfire

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

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Applicable emergency response plan requirements are set forth by the County of San Diego Office of Emergency Services Operational Area Emergency Plan and other local police and fire departments within or adjacent to the Project area. The Office of Emergency Services coordinates emergency response at the local level in the event of a disaster, including fires. However, emergency response coordination is generally facilitated by the Operational Area Emergency Operations Center as well as other local responding agencies.

State law requires that all local jurisdictions identify Very High Fire Hazard Severity Zones (VHFHSZs) within their areas of responsibility per California Government Code, Sections 51175–51189. Inclusion within these zones is based on vegetation density, slope severity, and other relevant factors that contribute to fire severity. The Project area is within a local responsibility area and is designated by California Department of Forestry and Fire Protection as a non-VHFHSZ. Because the EHI redevelopment area is not located in or near lands classified as a VHFHSZ, no impacts associated with this topic area are anticipated to occur with implementation of the Project. Therefore, no further discussion is warranted in the EIR.

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

No Impact. According to California Department of Forestry and Fire Protection's FHSZ Map of San Diego County (2009), the Project is in a local responsibility non-VHFHSZ. No impacts associated with wildfires are anticipated to occur with implementation of the Project, and no further discussion is warranted in the EIR.

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

Less than Significant Impact. While the Project would require modifications to the existing infrastructure system (e.g., modifications to existing roads and utility systems), these modifications would be installed within an urbanized area where existing infrastructure already exists. Modifications to these existing systems are not anticipated to exacerbate fire risk during implementation of the Project, and no further discussion is warranted in the EIR.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. Downstream flooding and landslide activity generally occur in areas that lack vegetation and have steep slopes. The Project area is within an area mapped as having a low potential for landslides to occur and is relatively flat. Therefore, implementation of the Project is not anticipated to expose people or structures to landslide risks associated with post-wildfire events, and no further discussion is warranted in the EIR.

4.21 Mandatory Findings of Significance

Does the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Note: Authority cited: Sections 21083 and 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21093, 21094, 21095, and 21151, Public Resources Code; Sundstrom v. County of Mendocino,(1988) 202 Cal.App.3d 296; Leonoff v. Monterey Board of Supervisors, (1990) 222 Cal.App.3d 1337; Eureka Citizens for Responsible Govt. v. City of Eureka (2007) 147 Cal.App.4th 357; Protect the Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal.App.4th at 1109; San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002) 102 Cal.App.4th 656.

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

Potentially Significant Impact. Implementation of the Project could result in potential impacts on biological resources Therefore, further analysis of the Project's potential impacts is warranted in the EIR.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Potentially Significant Impact. CEQA Guidelines, Section 15130, requires a discussion of the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable," meaning that the project's incremental effects are considerable when

viewed in connection with the effects of past, current, and probable future projects. The cumulative impacts discussion does not need to provide as much detail as is provided in the analysis of project-specific impacts and should be guided by the standards of practicality and reasonableness.

As determined by this Initial Study, there may be potentially significant effects related to aesthetics, air quality, biological resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, Tribal Cultural Resources, and utilities and service systems. Therefore, the Project's potential contribution to cumulative impacts related to these resources will be discussed in the EIR.

Because the Project would have no impact on agriculture and forestry resources, cultural resources, mineral resources, population and housing, recreation, or wildfire, it was determined that the Project would have no potential to result in cumulative impacts related to these resource areas. Further discussion of the cumulative effect on these resources is not warranted in the EIR.

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

Potentially Significant Impact. Based on the analysis above, the Project has the potential to result in significant impacts on aesthetics, air quality, biological resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, Tribal Cultural Resources, and utilities and service systems. As such, the Project has the potential to result in environmental impacts that could cause substantial adverse effects on human beings, either directly or indirectly. Therefore, further discussion is warranted in the EIR.

Section 5 References

CARB (California Air Resources Board). 2005. Air Quality and Land Use Handbook.

CAL FIRE (California Department of Forestry and Fire Protection). 2009. Fire Hazard Safety Zone (FHSZ) Map of San Diego County.

California Emergency Management Agency. 2009. Tsunami Inundation Map for the Point Loma Quadrangle. June.

City of San Diego. 2008. City of San Diego General Plan Conservation Element. Accessed November 2023. https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/2012/ce120100.pdf.

DOC (California Department of Conservation). 2023a. California Important Farmland Finder. Accessed November 2023. https://maps.conservation.ca.gov/DLRP/CIFF/.

DOC. 2023b. San Diego County Williamson Act. Accessed November 2023. https://www.conservation.ca.gov/dlrp/wa.

SDCRAA (San Diego County Regional Airport Authority). 2020. Naval Air Station North Island Airport Land Use Compatibility Plan. Accessed November 2023. https://www.san.org/DesktopModules/Bring2mind/DMX/API/Entries/Download?EntryId=16157&Command=Core_Download&language=en-US&PortalId=0&TabId=807.

SDRWQCB (San Diego Regional Water Quality Control Board). 2016. Water Quality Control Plan for the San Diego Basin. Amended May 17. Accessed November 2023. https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/.

This page intentionally left blank.

Section 6 California Department of Fish and Wildlife Fee Determination

(California Fish and Game Code, Section 711.4, Statutes of 2006 – SB 1535)

☐ It is hereby found that this Project involves no potential for any adverse effect, either individually or cumulatively, on wildlife resources and that a "Certificate of Fee Exemption" shall be prepared for this Project.

☒ It is hereby found that this Project could potentially impact wildlife, individually or cumulatively, and therefore, fees in accordance with Section 711.4(d) of the California Fish and Game Code shall be paid to the County Clerk.

This page intentionally left blank.

Section 7 Preparers

San Diego Unified Port District – Lead Agency

Wileen Manaois, Director, Development Services

Megan Hamilton, Senior Planner, Development Services

Eyestone Environmental – Project Mangement Consultant

Ashley Wright, Principal Planner

Harris & Associates – CEQA Consultant

Ryan Binns, PMP, ENV SP, Senior Director and Quality Assurance/Quality Control

Kelsey Hawkins, Project Manager, Air Quality/GHG/Noise Analyst

Paige Rincon, Environmental Analyst

Esther Daigneault, Environmental Analyst

Sharon Toland, Senior Air Quality/GHG/Noise Specialist

Randy Deodat, GIS Specialist

Lindsey Messner, Technical Editor

Eija Blocker, Technical Editor

This page intentionally left blank.