



June 12, 2024

**CEQA Initial Study - Environmental Checklist Form
(Based on the State CEQA Guidelines, Appendix G)**

The following discussion of potential environmental effects was completed in accordance with Section 15063 of the CEQA Guidelines to determine if the proposed project may have a significant effect on the environment.

1. Title: Amendments to the City of Coronado Historic Preservation Program

2. Lead agency name and address:
City of Coronado
Community Development Department
1825 Strand Way
Coronado, CA 92118

3. a. Contact: Tricia Olsen, Community Development Department
b. Phone number: (619) 522-7329
c. E-mail: tolsen@coronado.ca.us

4. Project location:

The city of Coronado ("City") is located within the county of San Diego, surrounded by San Diego Bay to the north and east and the Pacific Ocean to the west, and bordered by the city of San Diego to the north and east, National City and Chula Vista to the east, Imperial Beach to the south, and Naval Air Station North Island (NASNI) to the southeast. The City is connected to the mainland by a natural land bridge, called the Silver Strand, that extends southerly a distance of approximately 9 miles to the city of Imperial Beach. This land bridge separates the Pacific Ocean on the west from the bay located to the east. The City's limits extend from NASNI south along the Silver Strand to the city of Imperial Beach. The City is also connected to downtown San Diego by the two-mile-long San Diego-Coronado Bay Bridge (State Route 75). Figure 1 shows the City's regional location, Figures 2-1 through 2-3 show the project location on USGS maps, and Figure 3 shows the project location on an aerial photograph.

5. Project Applicant name and address:

City of Coronado
Community Development Department
1825 Strand Way
Coronado, CA 92118

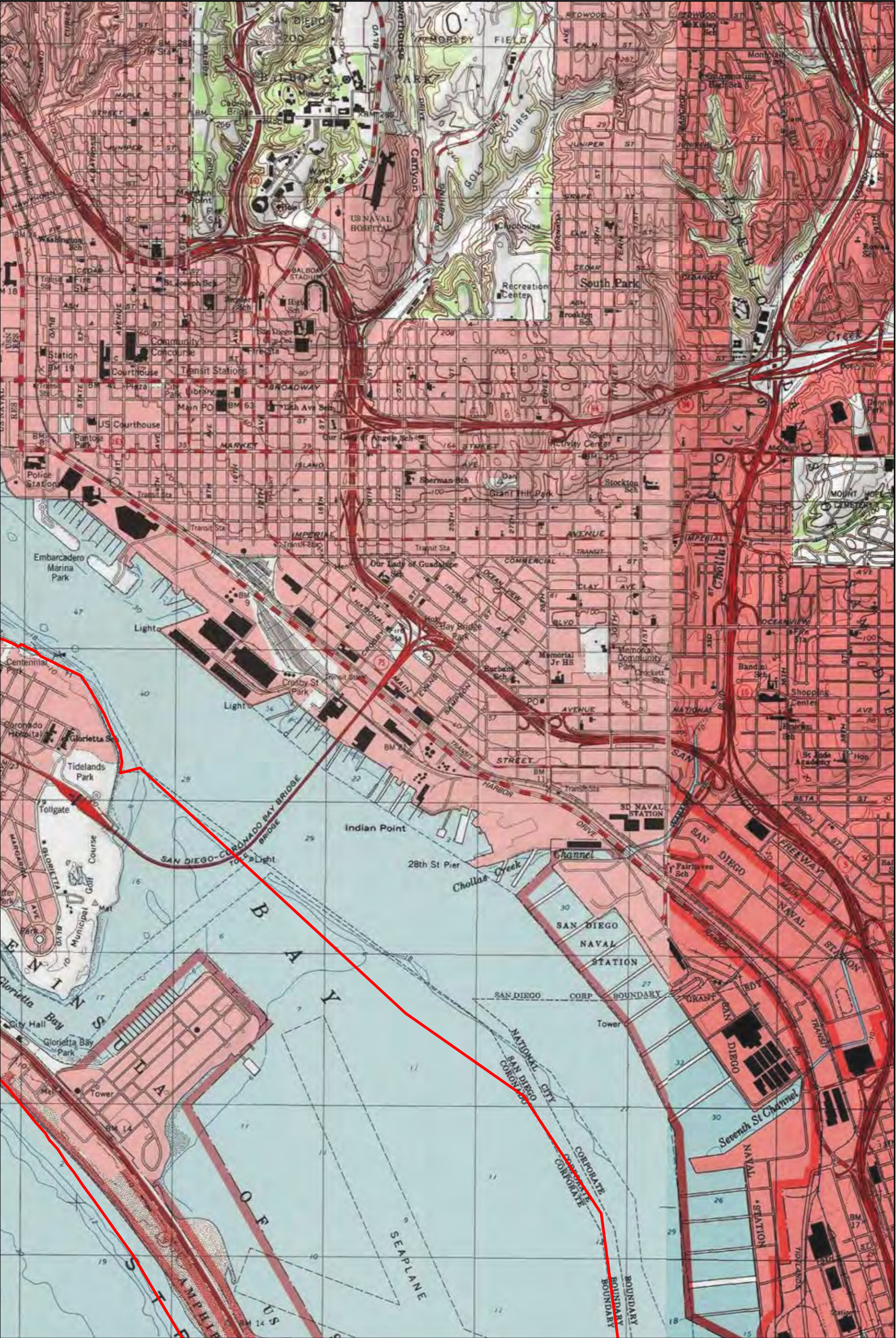


Project Boundary



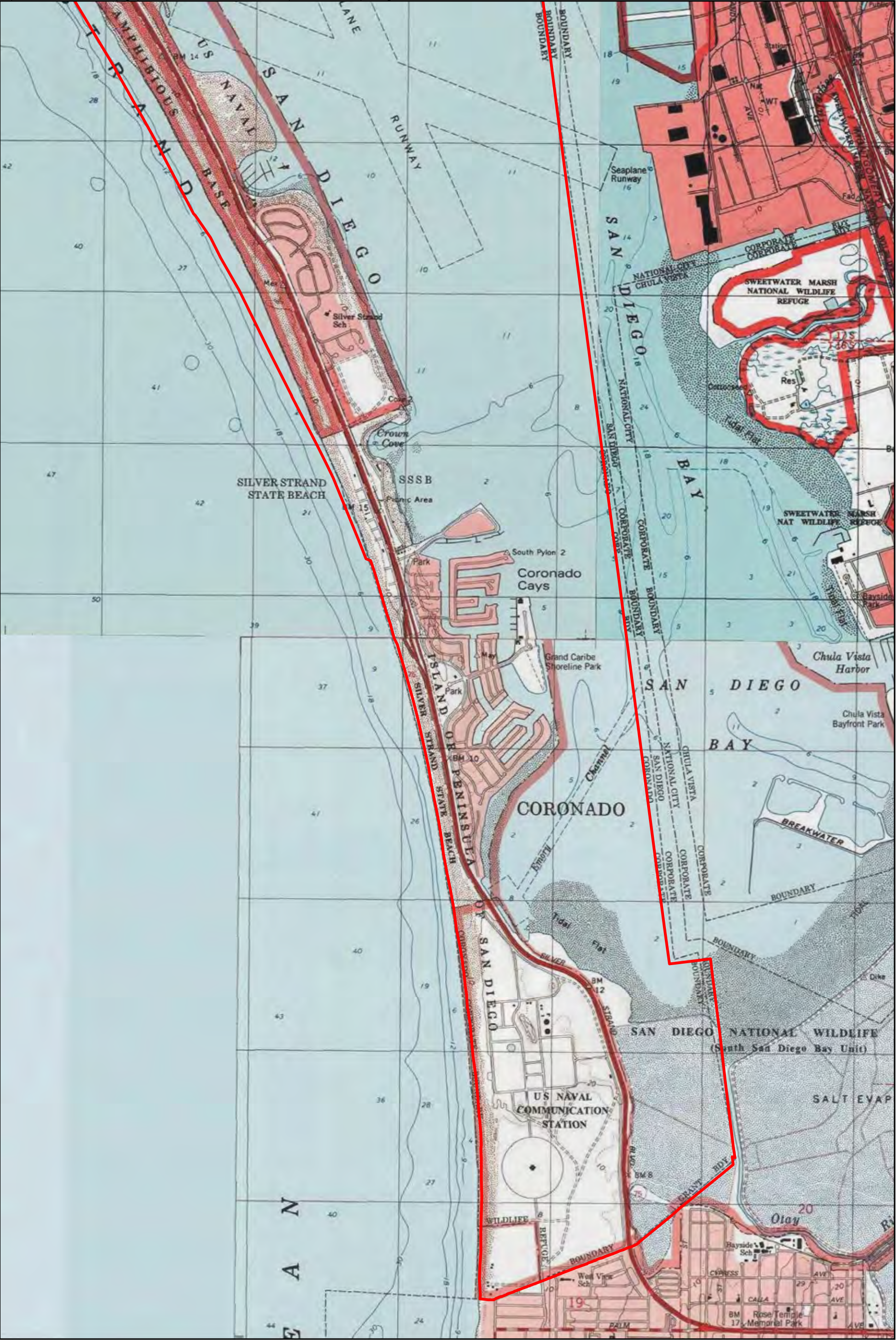
 Project Boundary

FIGURE 2-1
Project Location on USGS Map



 Project Boundary

FIGURE 2-2
Project Location on USGS Map



 Project Boundary

FIGURE 2-3
Project Location on USGS Map

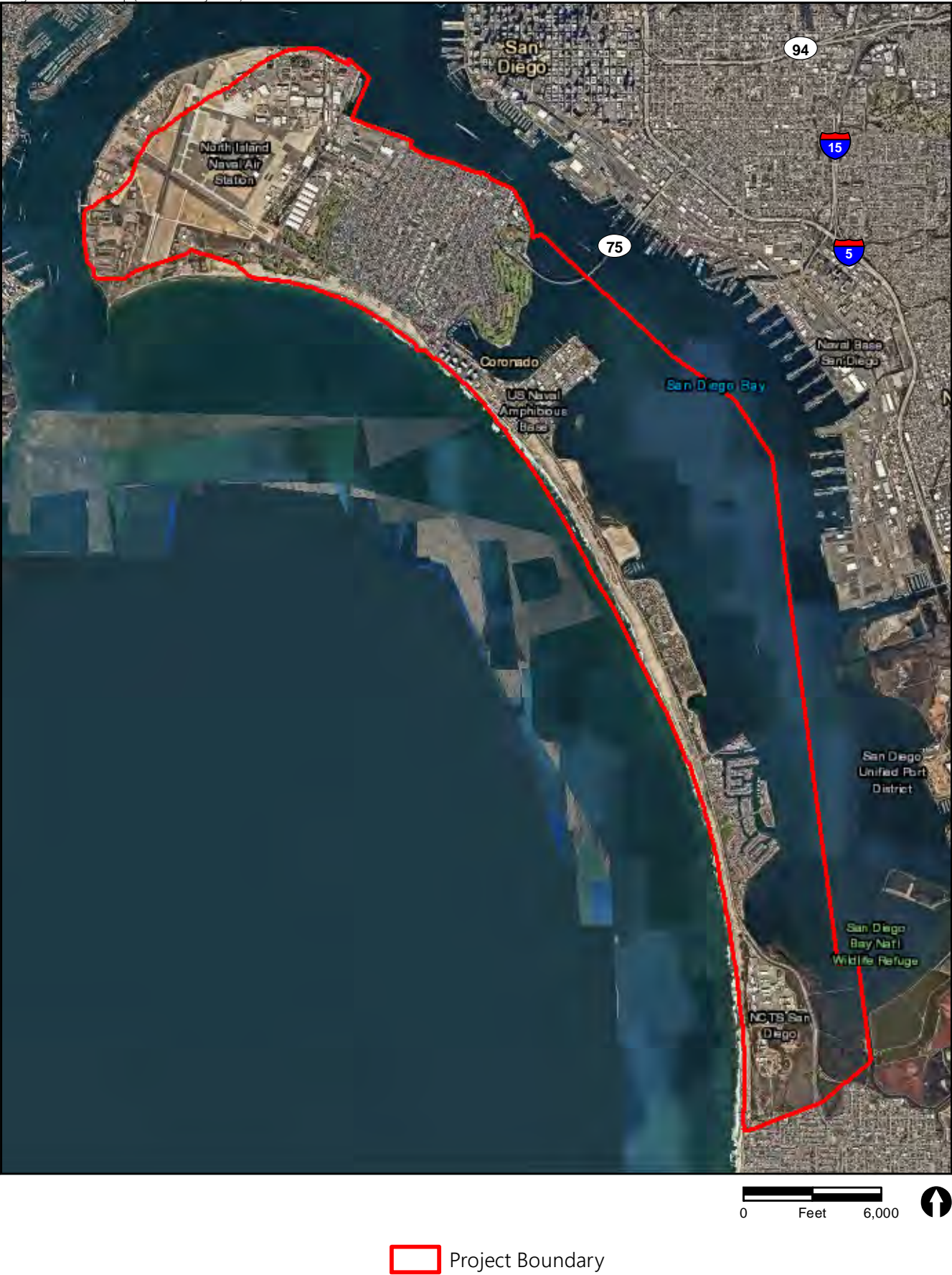


FIGURE 3
Project Location on Aerial Photograph

6. Description of project:

The project includes adoption of an Ordinance amending Title 84 of the Coronado Municipal Code (CMC) and adoption of a Historic Context Statement and Historic Resources Inventory (hereinafter referred to as the Historic Property Survey). Specifically, the project would update CMC Chapter 84.10, Historic Resource Code (City of Coronado 2018), to provide updated criteria for the City's definition and determination of historical significance. Multiple sections of the Historic Resource Code could be revised to identify a potentially historic structure as one that is 50 or more years old, revised from structures 75 years or older. Additionally, amendments to the CMC would remove structures referred to in the Historic Resources Inventory as a Tier 3 property from further historic review.

To inform the proposed Historic Resource Code amendments, a Historic Property Survey (Dudek 2023) was prepared. The historic context study area is depicted on Figure 4. The study area for the historic resources inventory and property survey is depicted on Figure 5. The Historic Property Survey was focused on the City's historic core and excludes NASNI, the U.S. Navy Amphibious Base, Port of San Diego property, state or federally owned property located within the city limits, and other sections of the City, such as the Coronado Cays. The Historic Property Survey evaluated properties under CMC Section 84.10.030, Criterion C to identify whether structures possess distinctive characteristics of an architectural style that have not been substantially altered (CMC Section 84.10.030(C)). While Criterion C is only one of the five criteria cited in CMC Section 84.10.030, Criterion C served as the basis of the Historic Property Survey as it was the most readily identifiable criterion that could be accomplished with reasonable effort, and because it was a criterion applied in nearly all—97 percent—of Historic Designation determinations. The purpose of the Historic Property Survey was to provide an architectural evaluation of properties, in an effort to identify potentially architecturally significant resources and reduce the number of properties that would be required to go through an in-depth historical review process based on the City's current Determination of Historic Significance. The Historic Property Survey defined three tiers relative to whether they may meet the Criterion C significance related to original architectural appearance, as follows:

- Tier 1 - Unaltered or minimally altered from historic condition and potentially eligible for City designation under Criterion C.
- Tier 2 - Recognizable as a particular architectural style but based on observation and/or construction history are more than "unaltered or minimally altered" from historic condition and do not appear to be eligible for historic designation under Criterion C.
- Tier 3 - Substantially altered properties that retain little to no elements of a particular architectural style and, based on observation and/or construction history, are not eligible for historic designation under Criterion C.

The Historic Property Survey identified a total of 989 structures built in 1948 or earlier that were assigned to the Tier 3 category. Another 708 structures built between 1949 to 1970 were identified as Tier 3 properties. Amendments to the CMC would remove structures referred to in the Historic Property Survey as a Tier 3 property from further historic review. Refer to Figure 6 for the location of Tier 3 properties as defined by the survey.

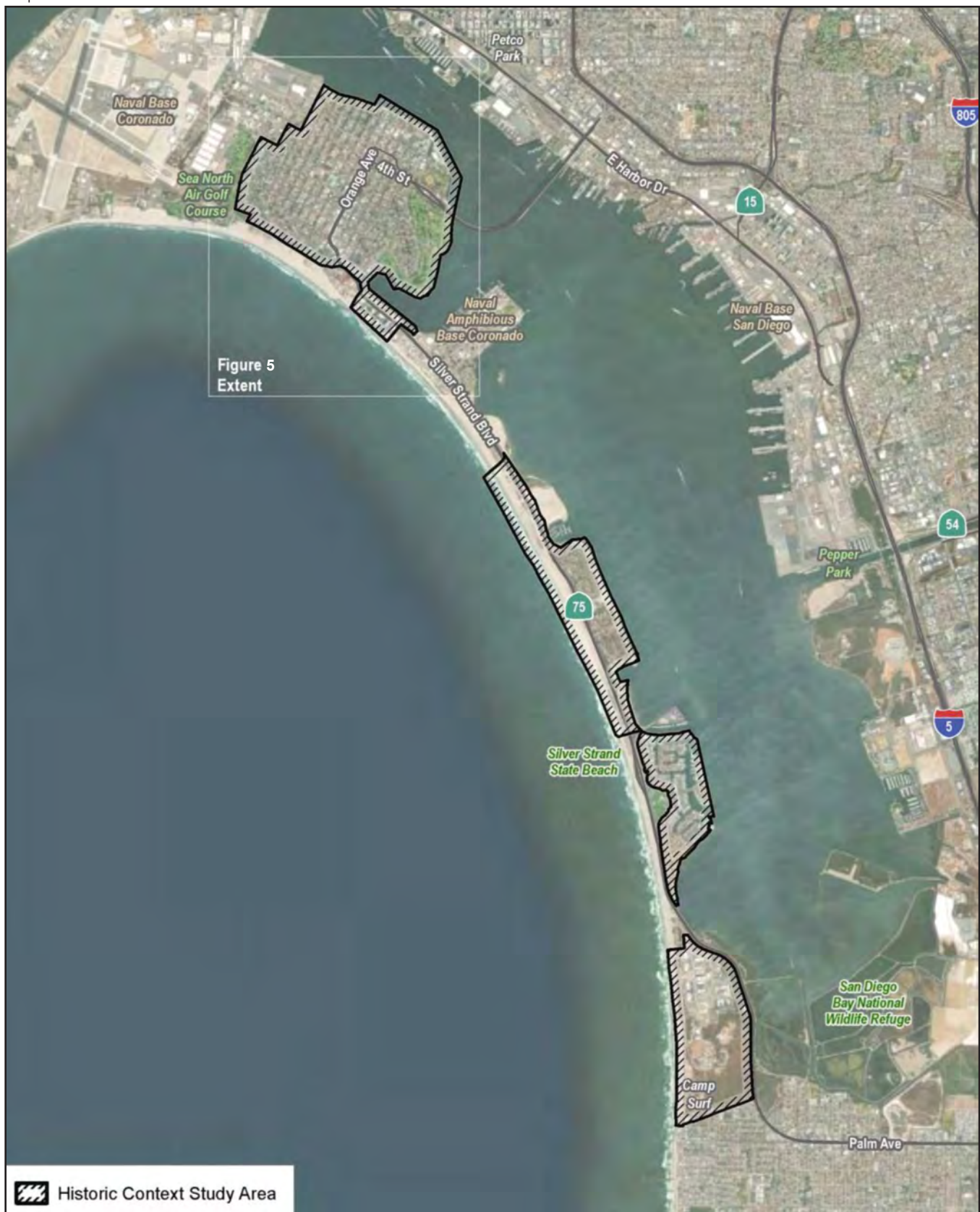


FIGURE 4
Historic Context Study Area



FIGURE 5
Historic Property Survey Area



FIGURE 6
Tier 3 Properties

Future Discretionary Actions

Discretionary actions are those actions taken by an agency that call for the exercise of judgment in deciding whether to approve or how to carry out a project. Implementation of the Historic Preservation Program could include the following discretionary actions:

- Adoption of an Ordinance amending Title 84 of the CMC to modify the City's current Determination of Historic Significance Review age threshold from 75- to 50- years, and exclude properties identified as Tier 3 from qualifying for historic designation under CMC Section 84.10.030(C).

7. Surrounding land uses and setting (Briefly describe the project's surroundings):

Land uses surrounding the study area include military uses (the NASNI to the north and the U.S. Navy Amphibious Base to the south), the Coronado Cays (residential) and Coronado Shores (beach and open space) to the south; the Pacific Ocean to the west, and the San Diego Bay to the northeast and east.

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

No approvals from other public agencies are required for the project.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES
☒

NO
☐

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission's Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality. The City initiated consultation with Native American tribes on June 12, 2024 and consultation is ongoing.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

June 12, 2024

Date

Tricia Olsen

Printed Name

Senior Planner

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a projects environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS -- Except as provided in Public Resources Code §21099 -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Less than Significant Impact: A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and to individual visual resources.

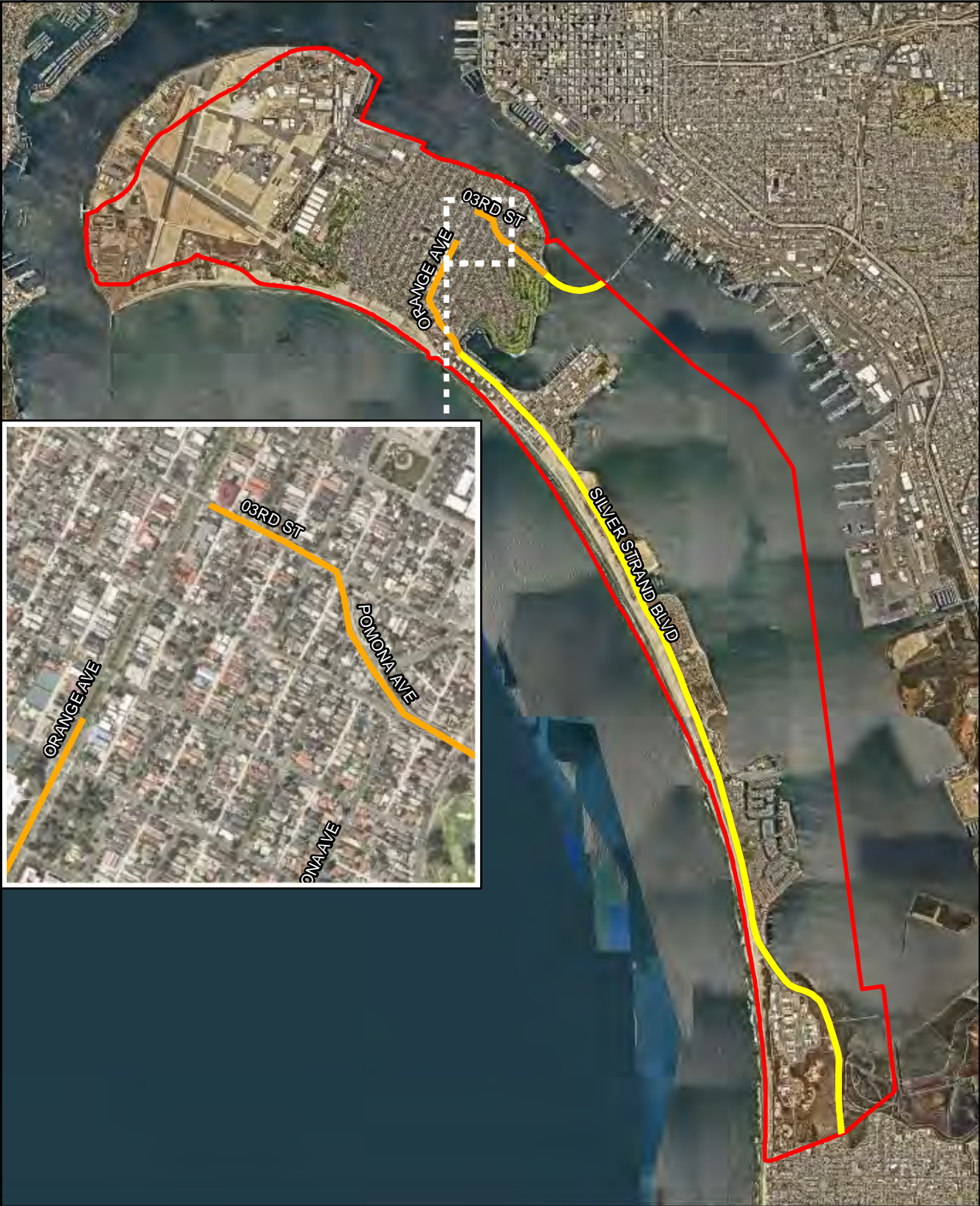
Approval of the project would not result in any new development or specific construction activity that could directly or indirectly have a substantial adverse effect on a scenic vista. The project would amend the types of properties that would be subject to the City's historic review process. The removal of Tier 3 properties from the City's historic review process could result in these structures being altered for renovations or removed for new residential construction. However, Tier 3 properties are defined as those that have been heavily altered and retain little to no elements of a particular architectural style. Therefore, these properties have already been altered beyond historical significance and further changes to such properties would not represent a change to a visual resource. Further alteration or removal of Tier 3 structures would therefore not result in a significant impact to a scenic vista. Implementation of the project would result in less than significant impacts related to scenic vistas.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: In 1974, the Silver Strand and Coronado Bay Bridge was designated a Scenic Highway by the State of California, shown in Figure 7 below. The City created the Scenic Highway Element of the General Plan to preserve, protect, and enhance the numerous views from the San Diego – Coronado Bay Bridge and Silver Strand corridor. Views include salt ponds, salt marshes, fresh vernal pools, beaches, San Diego Bay, the Pacific Ocean, Point Loma, Glorietta Bay, and the Hotel Del Coronado. In addition, wilderness areas and natural landscaping are major components of the Silver Strand's valuable scenic resources (City of Coronado 1999).



 Project Boundary

CA State Scenic Highways

 Officially Designated

 Eligible

 0 Feet 6,000



FIGURE 7
Scenic Resources

A Scenic Corridor is defined by the State of California Department of Transportation as “a band of visible land along and generally adjacent to but outside of the highway right-of-way having scenic, historical or aesthetic characteristic.” It is often described as “the-view-from-the-road.” A scenic highway is made up of the scenic corridor, the road itself and the right-of-way. Two sections of State Highway 75 comprise the scenic highway. They include the Silver Strand, from the Imperial Beach city limits to Pomona Avenue, and the San Diego – Coronado Bay Bridge.

The State of California and the U.S. Navy own the majority of lands on either side of the Silver Strand portion of Scenic highway 75. Beach and bayside property owned by the state and Navy is also utilized as public parks. Private land ownership is represented by the Coronado Cays development that was built subject to environmental and architectural review by the City of Coronado.

Approval of the project would not result in any new development or specific construction activity that could directly or indirectly have a substantial adverse effect on a scenic resource within a scenic corridor. The project would amend the types of properties that would be subject to the City’s historic review process. The project would not have the potential to adversely affect a scenic resource within a scenic corridor because no physical development is proposed. While the removal of Tier 3 properties from the historic review process could result in the removal or alteration of historic structures located within a scenic corridor, Tier 3 properties are defined as those that have been heavily altered and retain little to no elements of a particular architectural style. Therefore, these properties have already been altered beyond visual historical significance. Additional alteration or removal of Tier 3 structures would therefore not result in a significant impact to scenic resources within a state scenic highway. Further, the proposed ordinance amendments would not change regulations for properties along the Silver Strand where the majority of the officially designated scenic highway is located. The survey area depicted on Figure 5 is limited to the City’s historic core. Additionally, future development within a designated scenic corridor (S-H Overlay) would be subject to CMC Chapter 86.44 requiring consistency with specific design elements. Implementation of the project would result in less than significant impacts related to state scenic highways.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less than Significant Impact: According to Appendix G of the CEQA Guidelines, potential aesthetic impacts are evaluated differently based on whether a project is in a non-urbanized or urban area. Per this threshold, projects located in non-urbanized areas would result in a significant aesthetic impact if the project substantially degraded the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points).

Projects located in urbanized areas would result in a significant aesthetic impact if a project would conflict with applicable zoning and other regulations governing scenic quality. Because the project is located within an urbanized area, the latter criterion is applied for analyzing potential effects of the project on aesthetic resources. The City’s General Plan Community Design Element contains design goals for various areas of the City and details requirements for design review. The design requirements and standards outlined in Title 86, Zoning would not be affected by the project. Future residential alterations would continue to be subject to design review and applicable zoning standards. Therefore, the project

would not conflict with applicable zoning or other regulations governing scenic quality and impacts would be less than significant.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could create a new source of substantial light or glare which could adversely affect day or nighttime views in the area. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to create a new substantial light or glare which would adversely affect day or nighttime view in the area because no physical development is proposed. No Impact would occur.

II. AGRICULTURE AND FORESTRY RESOURCES -- In determining whether impacts to agricultural resources are Significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (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 in Forest Protocols adopted by the California Air Resources Board. -- Would the project:

- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The State of California Farmland Mapping and Monitoring Program indicates that there is no Prime Farmland, Unique Farmland or Farmland of Statewide Importance within the City and no properties are zoned for agricultural use. There is no designated forest land or timberland within the project area.

The City is largely built out and the small amounts of undeveloped land within the City are not utilized for agricultural production. The California Department of Conservation "California Important Farmland Finder" classifies the City as primarily "urban and built up land" with small portions of "other land" located along the Silver Strand (California Department of Conservation 2022). Further, approval of the project would not result in any new development or specific construction activity that could directly or indirectly result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The project would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to adversely affect farmland conversion because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: None of the parcels within the City are zoned for agricultural use or subject to a Williamson Act contract. Therefore, the project would not conflict with existing zoning for agricultural use or a Williamson Act Contract. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: None of the parcels within the City are zoned as forest land as defined in Public Resources Code §12220(g), timberland as defined by Public Resources Code §4526, or timberland zoned Timberland Production as defined by Government Code §51104(g). No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The City does not contain any forest land as defined by Public Resources Code §12220(g). Therefore, the project would not result in the loss of forest land or convert forest land to non-forest use. No impact would occur.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: There are no agricultural uses or forestlands within the City or surrounding area. Therefore, the project would not result in the conversion of farmland to a non-agricultural use or convert forestland to a non-forest use. No impact would occur.

III. 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:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Project consistency is based on whether the project would conflict with or obstruct implementation of the Regional Air Quality Standards (RAQS) and/or applicable portions of the SIP, which would lead to increases in the frequency or severity of existing air quality violations. The RAQS is the applicable regional air quality plan that sets forth the San Diego County Air Pollution Control District's (SDAPCD) strategies for achieving the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS). The San Diego Air Basin (SDAB) is designated a non-attainment area for the federal and state ozone standard. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the standards for ozone. The two pollutants addressed in the RAQS are reactive organic gases (ROG) and oxides of nitrogen (NO_x), which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions and, by extension, to maintaining and improving air quality. The RAQS was most recently updated in 2022.

The growth projections used by the SDAPCD to develop the RAQS emissions budgets are based on the population, vehicle trends, and land use plans developed in general plans and used by the San Diego Association of Governments (SANDAG) in the development of the regional transportation plans and sustainable communities strategy. As such, projects that propose development that is consistent with the growth anticipated by SANDAG and/or the General Plan would not conflict with the RAQS. In the event that a project would propose development that is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the project would exceed the growth projections used in the RAQS for the specific subregional area.

Approval of the project would not result in any new development or specific construction activity that could directly or indirectly conflict with or obstruct implementation of the SDAPCD RAQS and applicable portion of the SIPs. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to conflict with or obstruct implementation of the SDAPCD RAQS and SIPs because no physical development is proposed. Therefore, no impact related to implementation of regional air quality plans and State Implementation Plans would occur due to implementation of the project.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Both the state and the federal government have established health-based ambient air quality standards for the following criteria air pollutants: ozone (O₃); carbon monoxide (CO); NO_x; sulfur oxides (SO_x); particulate matter up to 10 microns in diameter (PM₁₀); particulate matter up to 2.5 microns in diameter (PM_{2.5}); and lead (Pb). Ozone is formed by a photochemical reaction between NO_x and ROG. The net increase in pollutant emissions of a project determines the impact on regional air quality.

The region is classified as an attainment area for all criterion pollutants except ozone, PM₁₀, and PM_{2.5}. The SDAB is a non-attainment area for the 8-hour federal and state ozone standards. Ozone is not emitted directly but is a result of atmospheric activity on precursors. NO_x and ROG are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone. PM_{2.5} includes fine particles that are found in smoke and haze and are emitted from all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM₁₀ includes both fine and coarse dust particles, and sources include crushing or grinding operations and dust from paved or unpaved roads.

Air quality impacts can result from the construction and operation of a project which results in emissions above air quality standards. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development or local effects stemming from sensitive receivers being placed close to roadways or stationary sources.

Approval of the project would not result in any new development or specific construction activity that could directly or indirectly generate substantial air quality emissions that could exceed air quality thresholds established by the SDAPCD. The project would amend the types of properties that would be subject to the City’s historic review process. The project would not have the potential to generate air quality emissions that would exceed air quality thresholds established by the SDAPCD because no physical development is proposed. No impact would occur.

c) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Air quality regulators typically define sensitive receptors as schools (preschool–12th grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Residential uses can also be considered sensitive receptors. Approval of the project would not result in any new development or specific construction activity that could expose sensitive receptors to substantial pollutant concentrations. The project would amend the types of properties that would be subject to the City’s historic review process. The project would not have the potential to expose sensitive receptors to substantial pollutant concentrations because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Individual responses to odors are highly variable and can result in various effects, including psychological (i.e., irritation, anger, or anxiety) and physiological (i.e., circulatory and respiratory effects, nausea, vomiting, and headache). Generally, the impact of an odor results from a variety of interacting factors such as frequency, duration, offensiveness, location, and sensory perception. The project does not include heavy industrial or agricultural uses that are typically associated with odor complaints. Approval of the project would not result in any new development or specific construction activity that could result in odors that could adversely affect a substantial number of people. The project would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to result in emissions and odors because no physical development is proposed. No impact would occur.

IV. BIOLOGICAL RESOURCES -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could directly or indirectly affect any special status species. The project would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to adversely affect sensitive species because no physical development is proposed, and the code amendments would not affect implementation of local, State or Federal regulations in place that offer protections for sensitive species. No impact would occur.

- 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 Wildlife or US Fish and Wildlife Service?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could directly or indirectly affect any special status species. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have

the potential to adversely affect riparian habitat or other sensitive natural communities because no physical development is proposed, and the code amendments would not affect implementation of local, state or federal regulations in place that offer protections for sensitive natural communities and riparian habitats. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could have a substantial adverse effect on state or federally protected wetlands. The project would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to adversely affect a wetland because no physical development is proposed. No impact would occur.

- d) Interfere substantially with the movement of any native resident or migratory Fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that interfere with movement of wildlife movement and corridors, or impede the use of native wildlife nursery sites. The project would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to interfere with wildlife movement and corridors or impede the use of native wildlife nursery sites because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not conflict with any local policies or ordinances for biological resources. Approval of the project would not result in any new development or specific construction activity that could conflict with local policies or ordinances for biological resources. The project consists of an amendment to the Historic Resource Code (Title 84 of the CMC) which would modify the types of properties within the City that are subject to a historic review. The project would not have the potential to conflict with any local policies or ordinances that protect biological resources because no physical

development is proposed, and the code amendments would not affect implementation of local regulations in place that protect biological resources. No impact would occur.

- f) Conflict with the provisions of an adopted Habitat Conservation Plan, or other approved local, regional, or state habitat conservation plan?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The City is part of the San Diego Multiple Species Conservation Program (MSCP) and currently has a Draft Subarea Plan. However, approval of the project would not result in any new development or specific construction activity that could conflict with the MSCP. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to conflict with the MSCP because no physical development is proposed, and the code amendments would not affect implementation of the MSCP. No impact would occur.

V. CULTURAL RESOURCES -- Would the project:

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

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: CEQA Guidelines Section 15064.5b states that a project may have a significant effect on the environment when a project may cause a substantial adverse change in the significance of an historical resource. A substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1)).

Impairment of an historical resource is further explained to include the following:

- A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA." (CEQA Guidelines Section 15064.5(b)(2).

The project consists of an amendment to Title 84 of the CMC updating the historic threshold from 75 years to 50 years to be consistent with CEQA Guidelines, as well as the exclusion of Tier 3 properties identified in the historic resource survey from historical review requirements.

As a result, the project would narrow down “potentially historic” properties in the City to only include properties identified as Tier 1 and 2 which are at least 50 years old. Tier 1 properties are those that were identified as either being unaltered or minimally altered from their historic condition and therefore retain historic integrity. Tier 2 properties are those that exceeded the integrity thresholds under Tier 3 as being Altered Beyond Recognition but failed to rise to the level of integrity under Tier 1. In other words, Tier 2 properties retain enough distinctive characteristics to be recognizable as an architectural style but did not rise to the level to be considered unaltered or minimally altered as per the City’s designation requirements. Tier 3 properties exhibit obvious substantial alterations such that they display little to no connection to the time in which they were originally constructed and as a result, are unlikely to retain enough integrity to be associated with any other City designation criteria.

With the approval of the project, the City would require a determination of historic significance application to be filed in association with any future project that includes demolition of original features visible from the street right-of-way of any structure that is 50 or more years old and not identified as a Tier 3 property in the Historic Property Survey. Tier 3 structures would be excluded from further historic review and processed ministerially.

As part of the Historic Property Survey, the Tier system was developed based on integrity and architectural distinctiveness required for a property to be locally designated under Criterion C of CMC 84.10.030 which states, “a resource may be designated a historic resource by the City’s Historic Resource Commission, if it meets two or more of the criteria set forth in this section *and*, additionally, must be at least 50 years old or have achieved historic significance within the past 50 years.” The criteria include:

- A) It exemplifies or reflects special elements of the City’s military, cultural, social, economic, political, aesthetic, or engineering history;
- B) It is identified with a person(s) or an event(s) significant in local, state or national history;
- C) It possesses distinctive characteristics of an architectural style, and has not been substantially altered;
- D) It is representative of the notable work of a builder, designer, architect, artisan or landscape professional;
- E) It has been listed on or formally determined eligible for the California Register, as set forth in Section 5024.1 of the California Public Resources Code (as amended from time to time);
- F) In the case of Historic Districts, at least 75 percent of the buildings within the proposed district (excluding accessory buildings) shall be contributing resources. (Ord. 2088 § 2 (Exh. A), 2018; Ord. 2029 § 1, 2011; Ord. 2018 § 4 (Att. C), 2010)

The Historic Property Survey assessed properties based only on their architectural characteristics and they were not evaluated with regards to the City’s other designation criteria. While it is unlikely that Tier 3 properties would retain enough integrity to be associated with any other City designation criteria, some Tier 3 properties could be potentially historically significant pursuant to CEQA Guidelines section 15064.5a Criterion 3a – historical resources associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage, and 3b – historical resources that are associated with the lives of persons important in our past.

With approval of the project, it is possible that potentially historic resources pursuant to CEQA Guidelines Section 15064.5a Criterion 3a and Criterion 3b would be excluded from historic review due to the exclusion of Tier 3 properties from historical review requirements. As a result, impacts related to historical resources would be potentially significant. This issue will be evaluated in further detail in a focused EIR.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could cause an adverse change in the significance of an archaeological resource. The project would amend the types of properties that would be subject to the City's historic review process. The project would not impact archaeological resources because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could disturb human remains. The project would amend the types of properties that would be subject to the City's historic review process. The project would not disturb human remains because no physical development is proposed. No impact would occur.

VI. ENERGY -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in wasteful, inefficient, or unnecessary consumption of energy resources because no physical development is proposed. No Impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could conflict with or obstruct a state or local plan for renewable energy. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to conflict with plans for renewable energy or energy efficiency because no physical development is proposed. No impact would occur.

VII. GEOLOGY AND SOILS -- Would the project:

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

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in adverse effects from earthquake or fault ruptures. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in adverse effects from earthquakes or fault ruptures because no physical development is proposed. Therefore, implementation of the project would result in no impacts related to earthquakes and fault ruptures.

- ii. Strong seismic ground shaking?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in adverse effects from seismic ground shaking. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in adverse effects from seismic ground shaking because no physical development is proposed. Therefore, implementation of the project would result in no impacts related to seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in adverse effects from seismic-related ground failure and liquefaction. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in adverse effects from seismic-related ground failure and liquefaction because no physical development is proposed. Therefore, implementation of the project would result in no impacts related to seismic-related ground failure and liquefaction.

iv. Landslides?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in adverse effects from landslides. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in adverse effects from landslides because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in substantial soil erosion or the loss of topsoil. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in substantial soil erosion or the loss of topsoil because no physical development is proposed. No impact would occur.

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 an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could be located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in an on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to result in adverse effects from landslides, lateral spreading, subsidence, liquefaction or collapse because no physical development is proposed. No impact would occur.

- 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could be located on expansive soil. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to be located on expansive soil because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to directly or indirectly destroy a unique paleontological

resource or site or unique geologic feature because no physical development is proposed. No impact would occur.

VIII. GREENHOUSE GAS EMISSIONS -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

Approval of the project would not result in any new development or specific construction activity that could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. The project would amend the types of properties that would be subject to the City’s historic review process. The project would not have the potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Executive Order (EO) S-3-05 and EO B-30-15 established GHG emission reduction targets for the state, and AB 32 launched the CARB Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target, which the state has achieved. As required by Senate Bill

(SB) 32, CARB's 2017 Climate Change Scoping Plan outlines reduction measures needed to achieve the interim 2030 target. AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan was adopted in December 2022. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279.

The project would not conflict with statewide goals to reduce GHG emissions as required by SB 32 and the 2017 Scoping Plan. Approval of the project would not result in any new development or specific construction activity that could conflict with plans and policies adopted for the purpose of reducing greenhouse gas emissions. The project would amend the types of properties that would be subject to the City's historic review process. The project would not have the potential to generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment because no physical development is proposed. No impact would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials. The project would amend the types of properties that would be subject to the City's historic review process. The project would not create a significant hazard to the public or environment through transport, storage, use, or disposal of hazardous materials because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could 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. The project would amend the types of properties that would be subject to the City's historic review process. The project would not create a hazard involving the release of hazardous materials into the environment because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The project would amend the types of properties that would be subject to the City's historic review process. The project would not emit hazardous emissions or materials within one-quarter mile of an existing or proposed school because no physical development is proposed. No impact would occur.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could create be located on a site which is included on a list of hazardous materials sites or is otherwise known to have been subject to a release of hazardous substances. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in development or specific construction activity that could be located on a site which is included on a list of hazardous materials sites or is otherwise known to have been subject to a release of hazardous substances because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in a safety hazard or excessive aircraft related noise for people residing or working in the project area. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in a safety hazard or excessive noise for people residing or working in the project area because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would amend the types of properties that would be subject to the City's historic review process. The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in exposure of people or structures to wildland fire hazards because no physical development is proposed. No impact would occur.

X. HYDROLOGY AND WATER QUALITY -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. The project would amend the types of properties that would be subject to the City's historic review process. The project would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project would amend the types of properties that would be subject to the City's historic review process. The project would not decrease groundwater supplies, interfere with groundwater recharge, or impede sustainable groundwater management of the basin because no physical development is proposed. No impact would occur.

- 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 surface, in a manner which would:

- (i) result in substantial erosion or siltation on- or off-site;

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in substantial erosion or siltation on- or off-site. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in substantial erosion or siltation on- or off-site because no physical development is proposed. No impact would occur.

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. The project would amend the types of properties that would be subject to the City's historic review process. The project would not increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide additional sources of polluted runoff. The project would amend the types of properties that would be subject to the City's historic review process. The project would not create runoff water which would exceed the capacity of existing or planned stormwater drainage systems, or provide additional sources of polluted runoff because no physical development is proposed. No impact would occur.

- (iv) impede or redirect flood flows?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could impede or redirect flood flows. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in development that would impede or redirect flood flows because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could risk release of pollutants due to project inundation in a flood hazard, tsunami, or seiche zone. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in development that would risk release of pollutants due to project inundation because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The project would amend the types of properties that would be subject to the City's historic review process. The project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan because no physical development is proposed. No impact would occur.

XI. LAND USE AND PLANNING -- Would the project:

a) Physically divide an established community?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could physically divide an established community. The project would amend the types of properties that would be subject to the City's historic review process. The project would not physically divide an established community because no physical development is proposed. No impact would occur.

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?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact: The project would amend the Historic Resource Code (Title 84 of the CMC) to eliminate Tier 3 properties from further historic review which, although unlikely, could result in significant impacts to property that could be historically significant due to their association with people places or events (Criterion A and B of CMC 84.10.030). Eliminating Tier 3 properties from further historic review could conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, specifically related to historic resources. Based on the Local Coastal Program Land Use Plan (City of Coronado 2005), example policies that the project could conflict with include, but are not limited to, the following:

City of Coronado General Plan

- Land Use Element Goal 5: That preservation of historic structures and neighborhoods should be encouraged.
- Housing Element Goal 4: To encourage the conservation and maintenance of its housing stock, neighborhoods, and history.
 - ✓ Policy 4.4: Provide incentives to rehabilitate and preserve historic housing.
 - ✓ Policy 4.5: Educate the public concerning the community's history and historic structures.

City of Coronado Local Coastal Program

- Designate and encourage the rehabilitation, preservation and viability of the community's historic and architecturally significant structures.

As a result of proposed amendments to the CMC, the project would cause a potentially significant environmental impact due to conflicts with plans and/or policies adopted for the purpose of protecting historic resources. This issue will be evaluated in further detail in a focused EIR.

XII. MINERAL RESOURCES -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could 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. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the loss of availability of known mineral resources of value to the region and the state because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the loss of availability of a locally-important mineral resource recover site because no physical development is proposed. No impact would occur.

XIII. NOISE -- Would the project result in:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could generate a temporary or permanent increase in ambient noise levels in the vicinity of

the project in excess of standards established in the local general plan and noise ordinance. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in an increase in ambient noise levels because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could generate excessive groundborne vibration or groundborne noise levels. The project would amend the types of properties that would be subject to the City's historic review process. The project would not generate excessive groundborne vibration or groundborne noise levels because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that would expose people residing or working in the project area to excessive airport related noise levels. The project would amend the types of properties that would be subject to the City's historic review process. The project would not expose people to excessive airport related noise levels because no physical development is proposed. No impact would occur.

XIV. POPULATION AND HOUSING -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could induce substantial unplanned population growth in the area either directly or indirectly. The project would amend the types of properties that would be subject to the City's historic review process. The project would not induce substantial unplanned population growth in the area as no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could displace substantial numbers of existing people or housing. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the displacement of substantial numbers of existing people or housing because no physical development is proposed. No impact would occur.

XV. PUBLIC SERVICES

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

- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

i. Fire protection?

No Impact: Approval of the project would not result in any new development or specific construction activity that could require new or expanded fire protection facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the need for new or expanded fire protection facilities because no physical development is proposed. No impact would occur.

ii. Police protection?

No Impact: Approval of the project would not result in any new development or specific construction activity that could require new or expanded police protection facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the need for new or expanded police protection facilities because no physical development is proposed. No impact would occur.

iii. Schools?

No Impact: Approval of the project would not result in any new development or specific construction activity that could require new or expanded school facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the need for new or expanded school facilities because no physical development is proposed. No impact would occur.

iv. Parks?

No Impact: Approval of the project would not result in any new development or specific construction activity that could require new or expanded park facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the need for new or expanded park facilities because no physical development is proposed. No impact would occur.

v. Other public Facilities?

No Impact: Approval of the project would not result in any new development or specific construction activity that could require new or expanded public facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the need for new or expanded public facilities because no physical development is proposed. No impact would occur.

XVI. RECREATION

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

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could increase the use of existing neighborhood and regional parks or other recreational facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not increase the use of existing neighborhood and regional parks or other recreational facilities because no physical development is proposed. No impact would occur.

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

<input type="checkbox"/> Potentially Significant Impact	<input type="checkbox"/> Less than Significant Impact
<input type="checkbox"/> Less Than Significant With Mitigation Incorporated	<input checked="" type="checkbox"/> No Impact

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could require the construction or expansion of recreational facilities. The project would amend

the types of properties that would be subject to the City's historic review process. The project would not require the construction or expansion of recreational facilities because no physical development is proposed. No impact would occur.

XVII. TRANSPORTATION -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities because no physical development is proposed, and the code amendments would not conflict with programs, plans, ordinances or policies addressing the circulation system. No impact would occur.

- b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Section 15064.3 of the CEQA Guidelines describes specific considerations for evaluating a project's transportation impacts. Generally, vehicle miles traveled is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel. The criteria for analyzing transportation impacts are:

- (1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
- (2) Transportation Projects. Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.

- (3) **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
- (4) **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.

Per the applicable guidance cited above, transportation projects that are presumed to have a less than significant impact on transportation are not required to conduct a VMT analysis. The project does not propose any development and consists of an amendment to the Historic Resource Code (Title 84 of the CMC) which would modify the types of properties within the City that are subject to a historic review. The project would not increase vehicle trips because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not increase hazards due to geometric design features or incompatible uses. The project would amend the types of properties that would be subject to the City's historic review process. The project would not increase hazards due to geometric design features or incompatible uses because no physical development is proposed. No impact would occur.

- d) Result in inadequate emergency access?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in inadequate emergency access. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in inadequate emergency access because no physical development is proposed. No impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:

a) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074 as either a site, feature, place, or 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 §5020.1(k), or

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

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 §5020.1(k)?

No Impact: Public Resources Code §5020.1(k) refers to historical resources that are officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution. No properties that are listed as historic by the State or the City of Coronado would be affected by the project. Proposed changes to Title 84 of the CMC would not remove any protections for existing State or locally designated historic resources.

Approval of the project would not result in any new development or specific construction activity that could cause an adverse change in the significance of a tribal cultural resource. The proposed amendments to the CMC would not impact tribal cultural resources because no physical development is proposed. Furthermore, historic resources are existing buildings, structures, and properties that are typically located in areas that are developed and where earth disturbing activities have previously occurred; therefore, the potential for discovery of Native American cultural resources would be low. No impact would occur.

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 §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?

No Impact: The proposed amendments to Title 84 of the CMC would affect how the City regulates historic, built-environment structures and would not have any effect on existing protections or regulations as it pertains to Tribal Cultural Resources. Nonetheless, the City initiated consultation with California

Native American tribes traditionally and culturally affiliated with the City consistent with the requirements of AB 52 on June 12, 2024.

XIX. UTILITIES AND SERVICE SYSTEMS -- Would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in the relocation or construction of new or expanded utility facilities. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in the relocation or construction of new or expanded utility facilities because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in insufficient water supplies to serve the project area. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in insufficient water supplies serving the project area because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could result in inadequate wastewater capacity. The project would amend the types of properties that would be subject to the City's historic review process. The project would not result in insufficient wastewater capacity because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not result in any new development or specific construction activity that could 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. The project would amend the types of properties that would be subject to the City's historic review process. The project would not generate waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or impair the attainment of solid waste reduction goals, because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would comply with federal, state, and local management and reduction of statutes and regulations related to solid waste. The project would amend the types of properties that would be subject to the City's historic review process. The project would comply with solid waste management and reduction statutes and regulations because no physical development is proposed. No impact would occur.

XX. WILDFIRE -- If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not impair an adopted emergency response plan or emergency evacuation plan. The project would amend the types of properties that would be subject to the City's historic review process. The project would not impair an adopted emergency response plan or emergency evacuation plan because no physical development is proposed. The project would not alter any established emergency vehicle routes. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The project would amend the types of properties that would be subject to the City's historic review process. The project would not expose occupants to pollutant concentration from a wildfire or the uncontrolled spread of a wildfire because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not require the installation or maintenance of infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The project would amend the types of properties that would be subject to the City's historic review process. The project would not require the installation or maintenance of infrastructure that may exacerbate fire risk because no physical development is proposed. No impact would occur.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Approval of the project would not expose people or structures to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability or drainage changes. The project would amend the types of properties that would be subject to the City's historic review process. The project would not expose people or structures to wildfire risks because no physical development is proposed. No impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially

reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact. Implementation of the project does not have the potential to result in significant impacts to biological resources as discussed in Section IV of this Initial Study. The project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. The project would have the potential to impact historical resources as discussed in Section V.a) of this Initial Study. The project would potentially eliminate important examples of major periods of California history.

As a result of this evaluation, there is substantial evidence that significant effects associated with this project would result. Potentially significant impacts of the project will be addressed in a Focused 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)?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Potentially Significant Impact. A cumulative impact may be significant if a project's incremental effect, though individually limited, is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. In addition to the projects impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. The project would amend the types of properties that would be subject to the City's historic review process. The project does not propose any physical development. However, the adoption of the project would result in potentially significant impacts to historical resources. The Historic Resource Code amendment would apply throughout the City and would exclude Tier 3 properties from historic review. As a result, the project could result in a cumulative loss of potentially historic properties as discussed in Section V.a) of this Initial Study. Therefore, the project's contribution to a potential cumulative impact would be potentially significant. Potentially significant impacts of the project will be addressed in a Focused EIR.

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

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact. The project would not have a significant impact related to any issue areas that could result in adverse effects to human beings either directly or indirectly. Impacts related to air quality and noise would be less than significant. No impacts would occur related to air quality, noise, hazards and hazardous materials, hydrology and water quality, and geology and soil and fire hazards because the project would not result in any physical development. Therefore, the project would not cause substantial adverse effects on human beings, either directly or indirectly, and the project has been determined not to meet this Mandatory Findings of Significance.

XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

California, State of

2022 Farmland Mapping and Monitoring Program. Department of Conservation

Coronado, City of

1999 General Plan, Scenic Highway Element. October.
[https://www.coronado.ca.us/DocumentCenter/View/1057/General-Plan-PDF?bidId=.](https://www.coronado.ca.us/DocumentCenter/View/1057/General-Plan-PDF?bidId=)

2005 Local Coastal Program Land Use Plan.
[https://www.coronado.ca.us/DocumentCenter/View/1060/Local-Coastal-Program-Land-Use-Plan-PDF?bidId=.](https://www.coronado.ca.us/DocumentCenter/View/1060/Local-Coastal-Program-Land-Use-Plan-PDF?bidId=)

2018 City of Coronado Historic Resource Code, Chapter 84.10.
[https://www.codepublishing.com/CA/Coronado/#!/Coronado84/Coronado8410.html#84.10.](https://www.codepublishing.com/CA/Coronado/#!/Coronado84/Coronado8410.html#84.10)

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2023 Historic Context Statement and Historic Resources Inventory, City of Coronado, November.