5/16/2025

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) INITIAL STUDY CHECKLIST

CITY OF NATIONAL CITY
Community Development Department – Planning Division
1243 National City Boulevard
National City, CA 91950

1. **PROJECT TITLE/PROJECT #:** 2025-02 GPA, ZC, ZV – General Plan Amendment and Zone Change for a property located at 3040 East 16th Street and neighboring parcels to change the zoning from RS-2 (Small Lot Residential) to MXC-1 (Minor Mixed Use Corridor).

2. **LEAD AGENCY:** City of National City
Community Development Department – Planning Division
1243 National City Boulevard
National City, CA 91950

Contact: Martin Reeder, AICP –Asst. Director of Community Development
Phone: (619) 336-4313

3. **PROJECT LOCATION:** 3040, 3042, 3102, and 3106 East 16th Street and 1540 Harbison Avenue, National City, CA 91950

4. **PROJECT PROPONENT:** Sushmitha Kudari

5. **ZONING DESIGNATION:** Small Lot Residential (RS-2)

6. **PROJECT DESCRIPTION:** The applicant is proposing to develop the property at 3040 East 16th Street with a five-unit multi-family residential building. The proposed development requires the existing single-family zoning to be changed to a zone that permits multi-family dwellings. This requires a General Plan land use designation change from Low Density Residential to Low Mixed-Use and a zone change from RS-2 (Small Lot Residential) to MXC-1 (Minor Mixed Use Corridor). For consistency with the existing development pattern and zoning in the area, the applicant has included five neighboring properties with this request. While not affecting the content of this Initial Study, the applicant is also applying for a Zone Variance for less than required street frontage. The MXC-1 zone requires a minimum of 75 percent of the building frontage be constructed within 10 feet of the front property line. However, due to the narrow width of the property (66 feet) and the requirement for a 20-foot driveway width, this would not be possible; therefore the applicant is requesting the variance.

The current residential density in the area proposed to be rezoned is six units per acre. There are 14 existing units on the subject properties where 21 would be allowed under the current RS-2 zoning (not including additional or bonus units permitted by state code). With the expected additional five units, the expected short term residential density would be eight units per acre, which is still less than what the area is currently zoned for. All of the subject properties were previously zoned Limited Commercial (CL). This zoning allowed up to 22.7 units per acre, but was supplanted by the RS-2 zone in 2011 as part of a General Plan and Land Use Code update at that time.

The southern half of the East 16th Street properties are adjacent to East 17th Street, which is a paper street and

not improved (it appears as a dirt road). Therefore, no emergency access is available from East 17th Street. As a result, any development on the 16th Street properties located more than 150 feet from the street would require a Fire Department turnaround. This necessitates a minimum lot width of 70 feet, where all the lots on 16th Street are no wider than 66 feet. As such, only the front 150 feet of each property is developable without combining lots and redeveloping existing structures, effectively halving the allowable density of the lots.

Due to topography, cost, and intervening structures, the likelihood of East 17th Street being improved is next to zero. The only caveat would be as part of a community or specific plan being created that would allow for reconfiguration of the properties abutting East 17th Street and a wholistic development plan being implemented .

This Initial Study is related to the General Plan Land Use designation and Zone change portion of the project only.

7. SURROUNDING LAND USES AND SETTING: The project site is mostly surrounded by low-medium density residential uses at approximately half the allowable density in the RS-2 zone (9 units per acre). There are a handful of properties occupied by commercial uses within the area, including a liquor store, a preschool, a small office building, and a utility substation. Three of the noted commercial properties are in the RS-2 zone and are considered legal nonconforming. If the zone is changed, these properties would be considered conforming and would also comply with the maximum floor area ratio requirement of the MXC-1 zone.

8. OTHER AGENCIES WHOSE APPROVAL MAY BE REQUIRED (AND PERMITS NEEDED): N/A

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" or is "Potentially Significant Unless Mitigated," as indicated by the checklist on the following pages.

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

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 the mitigation measures described on an attached sheet have been added to the project. **A MITIGATED NEGATIVE DECLARATION** will be prepared. ☐

I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required. ☐

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

Signature	Date
	May 15, 2025
Printed Name: Martin Reeder, AICP	Title: Asst. Director of Community Development

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 the project. A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards.

2. All answers must take account of the whole action involved. Answers should address 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, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence than 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 w/ Mitigation Incorporated" applied where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less then Significant Impact". The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

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).

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g. general plans, zoning ordinances). References 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 in 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 project's environmental effects in whichever 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.

ISSUES with Supporting Documentation & Sources

I – AESTHETICS - Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista? (Sources: 1, 2, 3)	☐	☐	☐	X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (Sources: 1, 2, 3)	☐	☐	☐	X
c) Substantially degrade the existing visual character or quality of the site and its surroundings? (Sources: 1, 2, 3)	☐	☐	☐	X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime Views in the area? (Sources: 1, 2, 3)	☐	☐	☐	X

The project area is comprised of six properties, four of which are developed. The six properties are surrounded by other existing urban development. There are no scenic vistas or resources in the area that would be affected by the project. The vacant property has a handful of mature invasive pepper trees, which are required to be preserved and, if removed, replaced by equal size and quality trees; therefore, no impact.

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 & 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:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (Sources: 1, 2, 3)	☐	☐	☐	X

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? (Sources: 1, 2, 3)	☐	☐	☐	X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? (Sources: 1, 2, 3)	☐	☐	☐	X
d) Result in the loss of forest land or conversion of forest land to non-forest use? (Sources: 1, 2, 3)	☐	☐	☐	X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (Sources: 1, 2, 3)	☐	☐	☐	X

The City of National City does not contain farmland or agricultural resources, forest land, nor any land zoned for agricultural use. As such, approval of this project will have no impact on such lands or resources.

III – AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan? (Sources: 1, 2, 3)	☐	☐	☐	X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Sources: 1, 2, 3)	☐	☐	☐	X
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Sources: 1, 2, 3, 4)	☐	☐	☐	X
d) Expose sensitive receptors to substantial pollutant concentrations? (Sources: 1, 2, 3)	☐	☐	☐	X
• e) Create objectionable odors affecting a substantial number of people? (Sources: 1, 2, 3)	☐	☐	☐	X

The City does not have any applicable air quality plan or standards that would apply in this case. Air quality is under the purview of the San Diego County Air Pollution Control District. The County of San Diego and National City are in attainment for all California Clean Air Act (CCAA) pollutants with the exception of ozone. Approval of this project will not conflict with or obstruct the implementation of the San Diego County Regional Air Quality Strategy (RAQS) to manage air quality in our region. The prescribed density of the project area (all six parcels) would allow up to 112 residential units if completely redeveloped. The two

vacant parcels total approximately 0.7 acres, which would allow up to 32 units. With the development limitations on the properties, only five units are expected to be constructed in the short term, which would not trigger any threshold for a focused traffic study or traffic impact analysis. Additionally, the potential traffic generated by the maximum residential development on these six properties (112) would generate less traffic than what is on the properties currently; therefore no impact.

IV – BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Sources: 5)	☐	☐	☐	X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Sources: 6)	☐	☐	☐	X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? (Sources: 5, 6)	☐	☐	☐	X
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? (Sources: 5)	☐	☐	☐	X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Sources: 1)	☐	☐	☐	X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? (Sources: 1)	☐	☐	☐	X

Four of the six properties are developed and disturbed residential or commercial properties, which do not have habitat of any kind. The vacant lot (3040 East 16th Street) is currently devoid of permanent vegetation, save for a handful of mature invasive pepper trees, which will be preserved or replaced by equal quality specimens.

There are no adopted habitat conservation plans within the City of National City and no riparian or wetland habitats identified; therefore, no impact.

V – CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5? (Sources: 3, 7)	☐	☐	☐	X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? (Sources: 3, 7)	☐	☐	☐	X
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Sources: 3)	☐	☐	☐	X
d) Disturb any human remains, including those interred outside of formal cemeteries? (Sources: 3)	☐	☐	☐	X

No historical or archaeological resources as defined in Section 15064.5 are known to exist on the proposed project site. However, there is one previously recorded cultural resource within a half-mile radius of the project area and two previously recorded historical structures within a half-mile radius of the project area. Even with the number of cultural resources recorded within a half-mile radius of the project area, there is a very low likelihood of encountering unrecorded cultural resources within the project area at such time as any construction takes place. Four of the six properties are developed and disturbed residential or commercial properties. The vacant lot (3040 East 16th Street) was previously developed with a single-family residence, which was demolished in 1977; therefore, no impact.

VI – GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Expose people or structures to 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. (Sources: 8)	☐	☐	X	☐
ii) Strong seismic ground shaking? (Sources: 8)	☐	☐	X	☐
iii) Seismic-related ground failure, including liquefaction? (Sources: 8)	☐	☐	☐	X
iv) Landslides? (Sources: 8)	☐	☐	☐	X
b) Result in substantial soil erosion or the loss of topsoil? (Sources: 2, 8)	☐	☐	☐	X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? (Sources: 8)	☐	☐	☐	X

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? (Sources: 8)	☐	☐	☐	X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water? (Sources: 8)	☐	☐	☐	X

California Geological Survey information indicates that, while within a half-mile of a quaternary fault (part of La Nacion Fault Zone), the site is not located within an Alquist-Priolo Special Studies Zone, and there are no known active or potentially active faults that intercept the project site; therefore, the potential for ground rupture at this site is considered low. The nearest active fault to the site is the La Nacion Fault, located approximately a mile to the northeast. Accordingly, the site is not considered to possess a significantly greater seismic risk than that of the surrounding area in general. The site is not within an area susceptible to landslides and not within a fault zone, slide prone area or an area susceptible to liquefaction; therefore there is no impact or increased exposure to landslides due to the proposed project.

It should be recognized that Southern California is an area that is subject to some degree of seismic risk and that it is generally not considered economically feasible nor technologically practical to build structures that are totally resistant to earthquake-related hazards. Construction in accordance with the minimum requirements of the Uniform Building Code should minimize damage due to seismic events. Due to the number and nature of the active and non-active fault lines within the southern California region, it cannot be known when earthquakes will occur; therefore, there is a less than significant impact.

Any future design and construction would require conformance with City's stormwater ordinance and grading regulations. Therefore, there is no impact or increased substantial erosion due to the proposed project.

The existing developed parcels are connected to traditional sewer laterals, which connect with the existing sewer system that serves the City. Any future design and construction would connect to the same system. There would be no use of septic tanks or alternative waste water disposal systems; therefore, no impact.

VII – GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Sources: 1, 9, 10)	☐	☐	☐	X
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Sources: 1,9, 10)	☐	☐	☐	X

GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects contributes substantially to the phenomenon of global climate change and its associated environmental impacts and as such is addressed only as a cumulative impact. With the development limitations on the properties, only five units are expected to be constructed in the short term; therefore no impact. However, any future construction of the density likely in a currently developed area, and with six individually small properties, would occur over a short construction duration and would consist primarily of emissions from equipment exhaust. There would also be long-term regional emissions associated with project-related new vehicular trips and indirect source emissions, such as energy usage.

The construction of five units in the short term would not create noticeable GHG emissions (30 ADT increase). Additionally, the potential traffic generated by the maximum residential development on these six properties (112) would generate less traffic than what is on the properties currently; therefore no impact.

California has adopted several policies and regulations for the purpose of reducing GHG emissions. On December 11, 2008, CARB adopted the AB 32 Scoping Plan to achieve the goals of AB 32 that establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The proposed project is subject to compliance with AB 32, which is designed to reduce statewide GHG emissions to 1990 levels by 2020. In April 2015, Executive Order B-30-15 was signed, which established a new GHG emissions reduction target of 40% below 1990 levels by 2030.

In addition, in 2024 the City of National City adopted its Climate Action Plan and associated targets to reduce GHG emissions by 40 percent below 2018 levels by 2030 and 80 percent of 2018 levels by 2050. Some of the primary provisions of the Climate Action Plan are to promote greater density and infill development, water conservation, energy efficiency, and waste reduction strategies. The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG emissions, as contained in the Climate Action Plan. Based on the above, therefore no impact.

VIII – HAZARDS & HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Sources: 1)	☐	☐	☐	X
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? (Sources: 1)	☐	☐	☐	X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? (Sources: 1)	☐	☐	☐	X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (Sources: 1)	☐	☐	☐	X
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 for people residing or working in the project area? (Sources: 1)	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area? (Sources: 1)	☐	☐	☐	X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Sources: 1)	☐	☐	☐	X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? (Sources: 1)	☐	☐	☐	X

The existing project area is developed with 14 residential units on six properties, as well as a liquor store and a preschool. No transport, use, or disposal of hazardous materials is expected, due to no additional construction at this time other than five residential units on a currently vacant property. At such time as the vacant lot is developed, the five additional residences would still be consistent with the currently prescribed density of the RS-2 zone, although more density would be permitted through changing to the MXC-1 zone. However, with the limitations on density due to Fire Department access, no additional units are realistically expected. Therefore, there will not be any reasonably foreseeable upset or accident condition involving the release of hazardous materials into the environment.

The project is not expected to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste in general, and is not within one-quarter mile of an existing or proposed school. The site is already mostly developed and future development would be residential in nature. The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As a result the project would not create a significant hazard to the public or the environment. Therefore, there would be no impact.

There is no adopted emergency response plan or emergency evacuation plan in the City, although there are local considerations that are included as appendices to the Unified San Diego County Emergency Services Organization approved Annex Q of the Operational Area Emergency Plan. The project does not conflict with any of the considerations or plans in the Area Emergency Plan, thus no conflict.

The site is not on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; There are no airports or airstrips in the vicinity; the project would not interfere with an adopted emergency response plan or emergency evacuation plan; and the project is not adjacent to any wildlands or land subject to wildland fires; therefore there would not be any significant risk of loss, injury or death involving wildfires. Therefore, there is no impact.

IX – HYDROLOGY / WATER QUALITY

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements? (Sources: 1)	☐	☐	☐	X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? (Sources: 1)	☐	☐	☐	X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site? (Sources: 1, 3, 6, 7)	☐	☐	☐	X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Sources: 1, 3)	☐	☐	☐	X
e) 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? (Sources: 1)	☐	☐	☐	X
f) Otherwise substantially degrade water quality? (Sources: 1)				

	☐	☐	☐	X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map? (Sources: 1)	☐	☐	☐	X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? (Sources: 1)	☐	☐	☐	X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? (Sources: 1)	☐	☐	☐	X
j) Inundation by seiche, tsunami, or mudflow? (Sources: 1)	☐	☐	☐	X

The project area is comprised of six properties, four of which are developed, and one previously disturbed/developed. At such time as the five-unit apartment project is proposed, the project will be subject to water quality and discharge requirements through the City's Jurisdictional Runoff Management Plan (JRMP). Future design of the potential five-unit apartment project, and any other future development, will require compliance with all storm water handling, storage, drainage, and hydromodification regulations. The property is not located within a 100-year flood hazard area or an area influenced by any levee or dam failure, seiche, tsunami, or mudflow; therefore, no impact.

X – LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community? (Sources: 1, 2, 3)	☐	☐	☐	X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? (Sources: 1, 2, 6)	☐	☐	☐	X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan? (Sources: 1, 2)	☐	☐	☐	X

The site is surrounded by existing mixed density residential development, including apartment buildings as dense or denser than what would be permitted by any potential rezoning. The existing density already allows for up to 21 units and only five would be constructed under potential short term future conditions. This is less than what the area is currently zoned for. In the event that the properties to be rezoned are all developed at their maximum allowable density, this would result in 112 units (98 new units). Given that the back halves of the 16th Street properties (five of the six properties) are practically undevelopable, the expected maximum density would be in the neighborhood of 30 units, which is less than the average density of the area (there are six apartment buildings located to the south and east of the project area. Because of the mixed and multi-family nature of the area, there would be no impact to an established community.

There are no applicable habitat conservation plan or natural community conservation plans in the City, therefore no impact.

XI – MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (Sources: 1)	☐	☐	☐	X
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? (Sources: 1)	☐	☐	☐	X

The project site is located completely within an urbanized area and surrounded by development. The site contains no known mineral resources on the proposed project site or delineated on a local plan for the site; therefore, there is no impact to mineral resources.

XII – NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Sources: 1, 2, 3)	☐	☐	☐	X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? (Sources: 1, 2, 3)	☐	☐	☐	X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? (Sources: 1)	☐	☐	☐	X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? (Sources: 1, 2, 3)	☐	☐	☐	X
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 expose people residing or working in the project area to excessive noise levels? (Sources: 1, 2, 3)	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels? (Sources: 1, 2, 3)	☐	☐	☐	X

The proposed project area is in an urbanized area and is a residential use in an area of mostly residential development. No construction is proposed at this time, although rezoning of the property will likely lead to the construction of five new residentials in the near future. Any new units themselves are not expected to generate any additional ambient noise in this area. Furthermore, any development is subject to the limitations contained in the City's Noise Ordinance; therefore, no impacts are expected.

Any associated construction in the future on the project site would create temporary noise impacts. Modern construction equipment, properly used and maintained, should not exceed the noise limits contained in the City's Noise Ordinance. All noise generated by the project would be required to comply with the City's Noise

Ordinance and be limited to specific hours of operation. No significant impact from the project would occur.

The proposed project site is not located within an airport land use plan or within two miles of a public use airport or private airstrip; therefore, there is no impact to those people working on the project site.

XIII – POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Induce substantial 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)? (Sources: 1, 2, 3, 14)	☐	☐	☐	X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere? (Sources: 1, 2, 3)	☐	☐	☐	X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? (Sources: 1, 2, 3)	☐	☐	☐	X

The property is currently zoned for a residential density of nine units per acre. The current actual residential density is six units per acre. There are 14 existing units on the subject properties where 21 would be allowed (not including additional or bonus units permitted by state code). With the expected additional five units, the expected short term residential density would be eight units per acre, which is still less than what the area is currently zoned for.

Because the southern half of the East 16th Street properties are not developable without providing Fire Department turnaround (which is not feasible under the current scenario) or improving East 17th Street (which is also unlikely due to the reasons outlined in the project description), the maximum density would not result in substantial population growth. In the event that the properties to be rezoned are all developed at their maximum allowable density, which would result in 112 units (98 new units), this would not be considered to be substantial population growth, in that the average people per household in the City is 3.122, more than County average of 2.74. Extrapolated to account for up to 98 additional units, this would be a potential total of 306 additional residents (assuming these would be new residents moving in to the City), an increase of a half percent of today's current population of approximately 55, 236; therefore no impact.

In the unlikely event that all residential properties rezoned are converted to purely commercial land use, the total number of units removed would be 14. This would equate to a potential displacement of 44 residents, which would not be considered a substantial number (0.8% of the current population); therefore no impact.

XIV – PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance				

objectives for any of the public services:

Fire protection? (Sources: 1, 3)	☐	☐	☐	X
Police protection? (Sources: 1, 3)	☐	☐	☐	X
Schools? (Sources: 1, 3)	☐	☐	☐	X
Parks? (Sources: 1, 3)	☐	☐	☐	X
Other public facilities? (Sources: 1, 3)	☐	☐	☐	X

The proposed project would not result in any impacts to public services, as no construction is proposed beyond the existing City limits and within an established neighborhood. Additionally, only two lots are vacant, with one being currently developable. Any redevelopment would replace existing uses and not have a significant effect on existing volumes of calls for service. The project site is currently and will continue to be served by the National City Fire and Police Departments. The closest Fire Station is approximately one-and-a-half miles away on East 4th Street, and the Police Station at 12th Street and National City Boulevard is approximately two miles away. Typical response time for this area would not be adversely impacted, as plans do not involve changes to public streets adjacent to the site. Any potential development of new residential or commercial uses will generate impact fees specifically slated for public services that will supplement any additional requirements brought about by said development; therefore, there is no impact. Park and school fees will also be paid as part of potential development to offset any increase in need generated by the project, thus no impact.

XV – RECREATION

	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Sources: 1, 2, 3)	☐	☐	☐	X
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? (Sources: 1, 2, 3)	☐	☐	☐	X

There are two parks (El Toyon and Las Palmas) within a mile of the project, which are currently underutilized and able to accommodate potential use by the potential addition of five new families that could be expected in the near term. Any future development would be subject to park fees to offset any increase in need generated by the project. Therefore, there would be no impact.

XVI – TRANSPORTATION AND TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit? (Sources: 1, 2, 3, 4, 15)	☐	☐	☐	X
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways? (Sources: 1, 2, 3)	☐	☐	☐	X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? (Sources: 1, 2, 3, 15)	☐	☐	☐	X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Sources: 1, 2, 3)	☐	☐	☐	X
e) Result in inadequate emergency access? (Sources: 1, 2, 3)	☐	☐	☐	X
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities? (Sources: 1, 2, 3)	☐	☐	☐	X

There are no plans, ordinances, or policies that measure circulation system current effectiveness or performance, thus no impact. There is also no congestion management program that the project would conflict with.

This segment of East 16th Street (Euclid Avenue to Harbison Avenue) has a project 2030 ADT (Average Daily Trip) rate of 8,300 and a capacity of 10,000 ADT. In 2030, the segment is expected to operate at a Level of Service (LOS) of D. According to trip generation rates published by the San Diego Association of Governments (SANDAG), five new units could be expected to generate another 30 vehicle trips per day, which would not exceed the proposed (2030) maximum capacity; therefore, no impact.

No change in road design is proposed which would cause a safety risk or hinder emergency access. Potential development would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, as there are no such activities existing or planned in this area; therefore, no impact.

With regard to Vehicle Miles Traveled (VMT), the project would screen out of VMT analysis related to CEQA, as the potential traffic generated by the maximum residential development on these six properties (112) would generate less traffic than what is on the properties currently. This is due to a preschool/childcare and liquor store on two of the properties. The liquor store (neighborhood market) in particular generates a

significant amount of traffic. Redevelopment to a mixed use style of development would also screen out, as the minimum project size would need to be five acres, where the total of all six properties in this case is 2.3 acres.

XVII – UTILITIES AND SERVICE SYSTEMS Would the project:	**Potentially Significant Impact**	**Less Than Significant w/ Mitigation Incorporation**	**Less Than Significant Impact**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? (Sources: 1, 11)	☐	☐	☐	**X**
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Sources: 1, 12)	☐	☐	☐	**X**
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? (Sources: 1, 12)	☐	☐	☐	**X**
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed? (Sources: 1, 12)	☐	☐	☐	**X**
e) 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? (Sources: 1, 12)	☐	☐	☐	**X**
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? (Sources: 1, 12)	☐	☐	☐	**X**
g) Comply with federal, state, and local statutes and regulations related to solid waste? (Sources: 1, 12)	☐	☐	☐	**X**

Any potential project would be designed and constructed using Best Management Practices (BMPs) to appropriately handle wastewater and not exceed wastewater treatment requirements of the San Diego Regional Water Quality Control Board; therefore, there is no impact.

The existing property is located within an urbanized area and served by existing water facilities. There is an existing 16-inch PVC water main in the East 16th Street right-of-way that services the property. Also, all necessary improvements would be included with potential development and project approval and construction would be undertaken in accordance with the National Pollutant Discharge Elimination System (NPDES) regulations; therefore, there would be no impact.

The existing area is served by EDCO, the local waste collection and recycle company. EDCO has a contract with the City to handle City residents' waste disposal and recycling needs. According to EDCO staff, the company utilizes several landfill sites for the disposal of waste collected in National City, with the most common being Otay Mesa, Sycamore, and Miramar Landfills, with an additional 12, 26 and 9 years of capacity remaining respectively; therefore, there is a less than significant impact. There are two other landfill sites in San Diego County – the Ramona landfill, which is full, and Borrego Springs landfill, which has an additional 30 years capacity remaining. In addition, potential development be required to comply with all

federal, state, and local statues and regulations related to solid waste.

XVIII – MANDATORY FINDINGS of SIGNIFICANCE	Potentially Significant Impact	Less Than Significant w/ Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory? (Sources: 1)	☐	☐	☐	X
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)? (Sources: 1)	☐	☐	☐	X
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? (Sources: 1)	☐	☐	☐	X

Discussion: No significant impacts to the environment as a result of this project have been identified. Approval of the project is not expected to have any significant impacts, either long-term or short-term, nor will it cause substantial adverse effect on human beings, either directly or indirectly.

REFERENCE SOURCES:

Reference #	Document Title	Available for Review at:
1	National City General Plan	National City Planning Division 1243 National City Boulevard National City, CA 91950
2	City of National City Municipal Code	https://library.municode.com/ca/national_city/codes/code_of_ordinances?nodeId=CD_ORD_TIT18ZO
3	Case File 2024-18 GPA, ZC, ZV	National City Planning Division
4	SANDAG trip generation by land use	www.sandag.org
5	US Fish and Wildlife Service	https://www.fws.gov/
6	US Fish and Wildlife Wetland Mapper System	https://www.fws.gov/wetlands/data/mapper.html
7	South Coastal Information Center (SCIC) cultural resources records search	National City Planning Division
8	California Department of Conservation	http://maps.conservation.ca.gov/cgs/fam/
9	City of National City Climate Action Plan	National City Planning Division
10	Environmental Protection Agency	https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator
11	Comments received from National City Fire Department	National City Planning Division
12	California Integrated Waste Management Board	http://www.ciwmb.ca.gov/
13	Environmental Protection Agency	https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator
14	San Diego Association of Governments	https://www.sandag.org
15	DATA USA (National City)	https://datausa.io/