City College Facilities Master Plan

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Draft Program Environmental Impact Report

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Lead Agency:

San Diego Community College District
1450 Frazee Road, Suite 500
San Diego, CA 92108

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
µPa	micro-Pascals
AAM	annual arithmetic mean
AB	Assembly Bill
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
ADT	average daily trips
AFY	acre-feet per year
AIA	Airport Influence Area
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
ASCE	American Society of Civil Engineers
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
ASTM	American Society for Testing and Materials
Attainment Plan	2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County
Basin Plan	Water Quality Control Plan for the San Diego Basin
bmp	best management practice
BTU	British thermal unit
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code

Acronyms and Abbreviations (cont.)

CFG Code	California Fish and Game Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHRIS	California Historical Resources Information System
City	City of San Diego
City College	San Diego City College
CNEL	Community Noise Equivalent Level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
County	County of San Diego
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CRPR	California Rare Plant Rank
CSU	California State University
CWA	Clean Water Act
CWUIC	California Wildland Urban Interface Code
dB	decibel
dBA	A-weighted decibels
District	San Diego Community College District
DOC	California Department of Conservation
DPM	diesel particulate matter
DSA	Division of the State Architect
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EO	Executive Order
EUI	energy usage intensity
EV	electric vehicle
FAA	Federal Aviation Administration
FCI	Facilities Condition Index
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FIRM	Flood Insurance Rate Map
FMP	City College Facilities Master Plan
FTA	Federal Transit Administration

Acronyms and Abbreviations (cont.)

g/L	grams per liter
GHG	greenhouse gas
GSF	gross square foot/feet
GWP	global warming potential
HA	hydrologic area
HABS	Historic American Buildings Survey
HALS	Historic American Landscapes Survey
HELIX	HELIX Environmental Planning
HFC	hydrofluorocarbon
HMBP	Hazardous Materials Business Plan
HRA	health risk assessment
HSA	hydrologic subarea
HU	hydrologic unit
HVAC	heating, ventilation, and air conditioning
Hz	Hertz
I-	Interstate
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
kBTU	kilo British Thermal Units
km	kilometer
KPI	Key Performance Indicator
kWh	kilowatt hour
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LEED	Leadership in Energy and Environmental Design
LEED-NC	LEED for New Construction
L_{EQ}	time-averaged noise level
LID	low impact development
LLG	Linscott, Law & Greenspan Engineers
LTS	less than significant impact
LTSM	less than significant impact with mitigation
L_V	vibration velocity level
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MHPA	Multi-Habitat Planning Area
MMT	million metric tons
MOU	Memorandum of Understanding
mph	miles per hour
MPO	Metropolitan Planning Organization

Acronyms and Abbreviations (cont.)

MRZ	mineral resource zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MT	metric ton
MTS	Metropolitan Transit System
MW	megawatt
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscaping Ordinance
MWh	megawatt hours
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCCP	Natural Communities Conservation Planning
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Determination
NOP	Notice of Preparation
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSLU	noise-sensitive land use
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OITC	Outdoor-Indoor Sound Transmission Class
OPR	Governor's Office of Planning and Research
PEIR	Program Environmental Impact Report
PFC	perfluorocarbon
PG&E	Pacific Gas & Electric
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
PM_{10}	coarse particulate matter, 10 microns or less in diameter
$PM_{2.5}$	fine particulate matter, 2.5 microns or less in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
project	City College Facilities Master Plan

Acronyms and Abbreviations (cont.)

PUD	City of San Diego Public Utilities Department
PV	photovoltaic
RAQS	2022 Revision to the Regional Air Quality Strategy for San Diego County
RCRA	Resource Conservation and Recovery Act
RHNA	Regional Housing Needs Assessment
ROG	reactive organic gas
ROW	right-of-way
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	San Diego Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SCH	State Clearinghouse
SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego County Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDNHM	San Diego Natural History Museum
SDUSD	San Diego Unified School District
SF	square foot/feet
SF_6	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plan
SO_2	sulfur dioxide
SO_X	sulfur oxides
SoCalGas	Southern California Gas
SPL	sound pressure level
SR	State Route
STC	Sound Transmission Class
SU	significant and unavoidable impact
SWIS	Solid Waste Information System
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board

Acronyms and Abbreviations (cont.)

TAC	toxic air contaminant
TAZ	traffic analysis zone
TCA	traditionally and culturally affiliated
TIS	Transportation Impact Study
TMDL	Total Maximum Daily Load
TPA	Transit Priority Area
TSM	Transportation Study Manual
USACE	U.S. Army Corps of Engineers
USC	United States Code
USDOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VdB	vibration velocity in decibels
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WMA	Watershed Management Area
WPCP	Water Pollution Control Plan
WQIP	Water Quality Improvement Plan
WQTR	Water Quality Technical Report
WUI	Wildland Urban Interface
ZEV	zero emission vehicle

EXECUTIVE SUMMARY

ES.1 Overview

This Program Environmental Impact Report (PEIR) has been prepared to evaluate the potential environmental impacts associated with the City College Facilities Master Plan (FMP; project) in accordance with the California Environmental Quality Act (CEQA). The FMP proposes a series of physical improvements across the campus that would accommodate anticipated enrollment increases and assist the San Diego Community College District (District) in meeting its educational and programming goals for San Diego City College (City College).

The District serves as the Lead Agency for the City College FMP PEIR. The District is governed by the Board of Trustees, which has the principal responsibility for approving campus planning documents and contracts for construction of new campus development. In compliance with CEQA, the purpose of this PEIR is to provide the District Board of Trustees and the general public with information concerning the potential environmental impacts associated with implementation of future projects identified in the FMP. This PEIR assesses impacts that would result from FMP implementation, presents mitigation measures that would avoid or reduce impacts deemed to be significant, and provides analysis of alternatives that would reduce or avoid significant environmental impacts. The PEIR provides an opportunity to consider both the programmatic effects of the FMP and provide the project-specific analysis of near-term projects needed for the District and responsible agencies to consider in issuing permits and approvals required for campus projects. Once certified, this PEIR would serve as the programmatic environmental document for the campus, enabling future projects to tier from the analysis in accordance with the subsequent review standards of CEQA.

ES.2 Project Background

The City College FMP describes the current status of the campus, summarizes its needs and goals, and outlines the common vision and purpose for its future. The FMP was approved on October 13, 2022, alongside an updated Educational Plan for 2022-2029. The FMP describes physical improvements required to achieve the strategic goals of the Educational Plan and to accommodate student growth. The designs and concepts presented in the FMP are conceptual and intended to serve as a framework for the future detailed design of campus improvements as funding becomes available.

ES.2.1 Measure HH Funding

On November 5, 2024, San Diego voters approved Measure HH, authorizing the District to issue $3.5 billion in bonds for District facility upgrades. Based on the campus facility needs and potential improvements described in the master plan for each District campus, certain projects have been prioritized to move forward with initial funding from Measure HH bond sales. Three of these projects would be constructed at City College in the near term. Future bond sales authorized by Measure HH would fund additional improvements described in the FMP as well as the master plans for the other District campuses.

ES.2.2 Campus Population Growth

For the purposes of this PEIR, a 1.5 percent annual growth rate has been selected to ensure that the environmental analysis accounts for reasonably foreseeable changes in on-campus enrollment over the next 20 years. This growth rate reflects the potential for attracting and accommodating additional students in on-campus courses through implementation of planned improvements to campus facilities, academic offerings, and student services, while also providing a conservative approach for environmental analysis and ensuring that the PEIR addresses potential impacts associated with continued on-campus enrollment growth. Applying a growth rate of 1.5 percent growth in the on-campus population per year, 8,856 on-campus students are anticipated to attend City College in 2045, an increase of 2,281 on-campus students compared to baseline (Fall 2025) conditions.

Employee growth is anticipated to maintain the current student-to-staff ratio, which reflects established operational standards for delivering academic programs and student services at City College. Approximately 2,225 employees would be required in 2045, representing an increase of 573 employees compared to baseline conditions.

ES.3 Project Summary

ES.3.1 Project Location

City College is located in the northeast corner of the downtown community of the City of San Diego (City) in San Diego County (County), California. Downtown is generally bounded by San Diego Bay to the west and southwest and Interstate (I-) 5 to the north and east from Little Italy to the Coronado Bridge. City College is located in the northeast subdistrict of the East Village neighborhood of downtown, which is characterized by high-density residential development mixed with institutional uses, smaller hotels, and retail.

The City College campus consists of 40 buildings totaling approximately 1,344,512 gross square feet (GSF) across 44 acres with North Campus and South Campus separated by Park Boulevard and Russ Boulevard. San Diego High School is nestled between these two areas to the northeast. North Campus is bounded by I-5 on the north, Russ Boulevard on the south, Park Boulevard on the east, and State Route (SR) 163 on the west. South Campus is bounded by Russ Boulevard on the north, C Street and Broadway on the south, I-5 on the east, and Park Boulevard and 15th Street on the west. There are numerous vehicular access points to City College from these adjacent roadways.

ES.3.2 Project Objectives

The fundamental purpose of the FMP is to guide the orderly and coordinated development of the City College campus to achieve District and campus program goals. The following project objectives have been identified for the purposes of CEQA:

1. Provide the facilities and infrastructure needed to accommodate projected enrollment through 2045.

2. Accommodate a diverse array of students and improve educational access for low-income and at-risk students, including single parents, foster youth, student veterans, and justice-impacted students, by providing affordable, on-campus housing and other supportive service programs.

3. Provide state-of-the-art general education, transfer, and career technical programs by using innovative technologies, teaching approaches, and instructional delivery systems.

4. Enhance City College as a "Unified Campus" with community gathering spaces, welcoming gateways, and a distinct campus identity.

5. Develop new campus facilities for programs currently relying upon facilities rated "Poor" or "Critical" on the Facility Condition Index.

6. Remove occupied building(s) from potentially active fault zones and reconstruct campus facilities outside of fault setbacks.

7. Improve campus accessibility and safety, including through the provision of wayfinding features, safe pedestrian routes, and sufficient parking for the campus population.

8. Physically connect City College to its surroundings in ways that promote community involvement while clearly distinguishing between welcomed public use and the established academic setting.

9. Incorporate sustainability features in future campus development and programming to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

10. Minimize the loss of instructional space and interruptions to campus activities during construction.

ES.3.3 Project Description

The FMP recommends a series of physical improvements across the City College campus and adjacent public rights-of-way. The projects would generally demolish existing aging facilities on the campus and replace them with more modern facilities that would accommodate existing programming. The FMP is conceptual in nature and describes potential projects for the campus that would assist City College in meeting its educational and programming goals. Specific project designs, building footprints, architectural details, circulation and parking improvements, infrastructure alignments, and operational characteristics are expected to be refined during future planning and design phases. Based on the concepts presented in the FMP, the improvements total approximately 366,800 GSF of new construction and include 680 parking spaces. These projects would require demolition of 148,262 GSF of existing buildings, resulting in a net increase of 218,538 GSF of campus building space. Final project sequencing, timing, and construction phasing would depend on funding availability, operational considerations, and District priorities.

The Building A Expansion, Performing Arts Center, and North Campus Athletic Fields projects are anticipated to be designed and constructed in the near term and further detail regarding these projects is available to inform a project-level analysis. Therefore, additional detail regarding these projects is provided below. No specific timing or phasing is identified for the remaining projects or campus-wide improvements. Specific long-term projects identified for development under the FMP include the following:

- North Campus Athletic Complex (new building and parking structure, replace tennis courts)
- New mixed-use classroom/office building and parking structure on North Campus
- Replacement of East Village Middle College High School building
- Building R faculty office addition
- New student commons and café building attached to parking structure south of Building R
- Maintenance and Operations offices, storage, and parking
- Seeds@City classrooms and offices
- Exterior amphitheater

Campus-wide improvements related to utility infrastructure and circulation are also part of the FMP and could be implemented in coordination with the projects listed above or undertaken as campus-wide efforts. Interior renovations, continued maintenance, and other minor construction could also occur throughout existing campus buildings.

ES.3.3.1 Near-Term Projects

Building A Expansion

A new addition to Building A is proposed to replace the existing 32,399-GSF D Building, which contains the campus bookstore and dining facilities adjacent to Gorton Quad. The proposed building would be approximately 110,000 GSF and would accommodate a mix of student support, administrative, dining, and campus-serving functions. The Building A expansion would be designed in coordination with the existing Building A facilities, similar to the existing integration with D Building. Reconfiguration of landscape and hardscape throughout Gorton Quad would occur as part of the Building A Expansion project to accommodate revised circulation patterns to the proposed building entries while also providing new outdoor gathering areas.

Performing Arts Center

Saville Theatre is proposed to be replaced with an expanded and upgraded building including theater space and new dance and music rooms. The existing 10,000-GSF theater would be demolished and an approximately 20,000-GSF Performing Arts Center, inclusive of a new theater, would be constructed. The new Performing Arts Center would have a street-level lobby space, a widened proscenium arch in the theater, connection to a future exterior amphitheater, and rooms for dance and music programming.

North Campus Athletic Fields

Near-term improvements to athletic facilities on North Campus would include the addition of sand volleyball facilities and renovations of existing softball and soccer fields. North of the existing tennis courts, new sand volleyball courts are proposed.

Improvements to the Betty Hock Softball Field would include rotation of the field to the optimal north-northeast direction and construction of new dugouts, an announcer's booth, a backstop, batting cages, and bullpens. A new 1,800-GSF field house would also be constructed adjacent to both the softball field and volleyball courts, containing restrooms and storage rooms. Lighting would also be installed at the softball field and volleyball courts to allow evening usage. Light poles would be up to 80 feet in height and lights would result in approximately 50 foot-candles.

Improvements to the soccer field, which is separated from the rest of North Campus by a freeway on/off ramp and accessible via a concrete underpass, would include a walk-jog path, a new 1,800-GSF field house containing restrooms and storage space, and a 200-GSF announcer's booth. The existing 918-GSF field house would be demolished. The soccer field would be replaced in its entirety, including new irrigation and a widened configuration to meet standard collegiate soccer pitch dimensions. Consistent with lighting described above, light poles up to 80 feet in height with lights resulting in approximately 50 foot-candles would be installed at the soccer field to allow evening usage.

ES.4 Summary of Environmental Effects and Mitigation Measures

This PEIR examines the potential environmental effects of the proposed FMP, including the near-term projects, considering information related to existing site conditions, analyses of the types and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid potential environmental impacts. Table ES-1, *Summary of Impacts and Mitigation Measures*, provides a summary of the environmental impacts that could result from implementation of the FMP at the program-level and project-level, feasible mitigation measures that would reduce or avoid the significant impacts, and conclusions as to whether the significant impacts have been mitigated below a level of significance. In addition, Table ES-1 provides a summary of cumulative impacts that could result with project implementation. Impacts related to agricultural and forestry resources and mineral resources were determined to not present a potentially significant environmental impact and are discussed further in Section 4.0, *Effects Found Not to be Significant*.

Table ES-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Aesthetics			
Scenic Vistas	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Scenic Resources	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Conflict with Scenic Quality Regulations	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Light and Glare	**Program-Level** Significant (construction) Less than Significant (operation) **Project-Level** Significant (construction) Less than Significant (operation) **Cumulative** Not cumulatively considerable	**Program-Level** AES-1 Exterior Lighting AES-2 Glare Reduction **Project-Level** AES-1 Exterior Lighting AES-2 Glare Reduction **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Air Quality			
Air Quality Plans	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Air Quality Standards	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Sensitive Receptors	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Odors	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Biological Resources			
Special-Status Species	**Program-Level** Significant (direct and indirect)	**Program-Level** BIO-1 Raptor Nest Avoidance BIO-2 Nesting Bird Avoidance	**Program-Level** Less than Significant

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
	Project-Level Significant (direct and indirect) **Cumulative** Not cumulatively considerable	**Project-Level** BIO-1 Raptor Nest Avoidance BIO-2 Nesting Bird Avoidance **Cumulative** No mitigation is required.	**Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Sensitive Habitats	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wetlands	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wildlife Corridors	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Local Policies or Ordinances	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Conservation Plans	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Cultural Resources			
Historic Resources	**Program-Level** Significant	**Program-Level** CUL-1 Project-Level Historic Properties Project Impact Analysis CUL-2 HABS or HALS Documentation for Historic Resources CUL-3 Relocation of a Historical Resource CUL-4 Interpretation/Commemoration of a Historical Resource	**Program-Level** Significant and Unavoidable
	Project-level ***Building A Expansion:*** Significant	**Project-level** ***Building A Expansion:*** CUL-2 HABS or HALS Documentation for Historic Resources CUL-3 Relocation of a Historical Resource CUL-4 Interpretation/Commemoration of a Historical Resource	**Project-level** ***Building A Expansion:*** Significant and Unavoidable
	Performing Arts Center: Significant	***Performing Arts Center:*** CUL-2 HABS or HALS Documentation for Historic Resources CUL-3 Relocation of a Historical Resource CUL-4 Interpretation/Commemoration of a Historical Resource	***Performing Arts Center:*** Significant and Unavoidable
	North Campus Athletic Fields: No Impact	***North Campus Athletic Fields:*** No mitigation is required.	***North Campus Athletic Fields:*** No Impact

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
	Cumulative Cumulatively considerable	**Cumulative** CUL-1 Project-Level Historic Properties Project Impact Analysis CUL-2 HABS or HALS Documentation for Historic Resources CUL-3 Relocation of a Historical Resource CUL-4 Interpretation/Commemoration of a Historical Resource	**Cumulative** Cumulatively considerable
Archaeological Resources	**Program-Level** Significant **Project-level** ***Building A Expansion:*** Significant ***Performing Arts Center:*** Less than Significant ***North Campus Athletic Fields:*** Significant **Cumulative** Not cumulatively considerable	**Program-Level** CUL-5 Cultural Resources Monitoring Program **Project-level** ***Building A Expansion:*** CUL-5 Cultural Resources Monitoring Program ***Performing Arts Center:*** No mitigation is required. ***North Campus Athletic Fields:*** CUL-5 Cultural Resources Monitoring Program **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-level** ***Building A Expansion:*** Less than Significant ***Performing Arts Center:*** Less than Significant ***North Campus Athletic Fields:*** Less than Significant **Cumulative** Not cumulatively considerable
Human Remains	**Program-Level** Significant **Project-Level** Significant **Cumulative** Not cumulatively considerable	**Program-Level** CUL-6 Procedure for Inadvertent Discovery of Human Remains **Project-Level** CUL-6 Procedure for Inadvertent Discovery of Human Remains **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Energy			
Energy Consumption	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Energy Plans	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Geology and Soils			
Seismic Hazards	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Soil Erosion	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Ground Instability	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Expansive Soil	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Septic Tanks	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable
Paleontological Resources	**Program-Level** Significant **Project-Level** Significant **Cumulative** Not cumulatively considerable	**Program-Level** GEO-1 Initial Project Review GEO-2 Monitoring GEO-3 Treatment of Fossil Discoveries GEO-4 Inadvertent Fossil Discoveries **Project-Level** GEO-1 Initial Project Review GEO-2 Monitoring (if applicable) GEO-3 Treatment of Fossil Discoveries (if applicable) GEO-4 Inadvertent Fossil Discoveries **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Greenhouse Gas Emissions			
Greenhouse Gas Emissions	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Greenhouse Gas Emission Reduction Plans	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Hazards and Hazardous Materials			
Transport, Use, Disposal of Hazardous Materials	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Accidental Release of Hazardous Materials	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Hazards to Schools	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Listed Hazardous Materials Sites	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Airport Hazards	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Emergency Response and Evacuation Plans	**Program-Level** Significant **Project-Level** Significant **Cumulative** Not cumulatively considerable	**Program-Level** TRA-1 On-Campus Construction Traffic Management Plan **Project-Level** TRA-1 On-Campus Construction Traffic Management Plan **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wildland Fires	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Hydrology and Water Quality			
Water Quality Standards	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Groundwater Supplies and Recharge	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Drainage Patterns	**Program-Level** Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	**Program-Level** HYD-1 Project-Specific Hydraulic Assessment for Projects within Flood Hazard Areas **Project-Level** No mitigation is required. **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Inundation	**Program-Level** Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	**Program-Level** HYD-1 Project-Specific Hydraulic Assessment for Projects within Flood Hazard Areas **Project-Level** No mitigation is required. **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Water Quality and Groundwater Management Plans	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Land Use and Planning			
Community Division	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable
Land Use Plans, Policies, and Regulations	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** No Impact **Project-Level** No Impact **Cumulative** Not cumulatively considerable
Noise			
Increase in Ambient Noise Levels	**Program-Level** Significant **Project-Level** ***Building A Expansion:*** Significant (construction) Less than Significant (operation) ***Performing Arts Center:*** Significant	**Program-Level** NOI-1 Construction Noise Screening NOI-2 Outdoor Amplification Equipment Noise Assessment NOI-3 Stationary Noise Source Assessment **Project-Level** ***Building A Expansion***: NOI-1 Construction Noise Screening ***Performing Arts Center***: NOI-1 Construction Noise Screening NOI-3 Stationary Noise Source Assessment	**Program-Level** Less than Significant **Project-Level** ***Building A Expansion***: Less than Significant ***Performing Arts Center***: Less than Significant

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
	North Campus Athletic Fields: Less than Significant **Cumulative** Not cumulatively considerable	***North Campus Athletic Fields***: No mitigation is required. **Cumulative** No mitigation is required.	***North Campus Athletic Fields***: Less than Significant **Cumulative** Not cumulatively considerable
Ground-Borne Vibration	**Program-Level** Significant **Project-Level** ***Building A Expansion:*** Significant (construction) Less than Significant (operation) ***Performing Arts Center:*** Significant (construction) Less than Significant (operation) ***North Campus Athletic Fields:*** Less than Significant **Cumulative** Not cumulatively considerable	**Program-Level** NOI-4 Construction Vibration Screening and Monitoring **Project-Level** ***Building A Expansion***: NOI-4 Construction Vibration Screening and Monitoring ***Performing Arts Center***: NOI-4 Construction Vibration Screening and Monitoring ***North Campus Athletic Fields***: No mitigation is required. **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** ***Building A Expansion***: Less than Significant ***Performing Arts Center***: Less than Significant ***North Campus Athletic Fields***: Less than Significant **Cumulative** Not cumulatively considerable
Airport Noise Exposure	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Population and Housing			
Population Growth	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Housing Displacement	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Public Services			
Fire Protection	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Police Protection	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Schools	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Parks	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Other Public Services	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Recreation			
Use of Existing Recreational Facilities	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Expansion of Recreational Facilities	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Transportation			
Circulation Programs, Plans, Ordinances, and Policies	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Vehicle Miles Traveled	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Hazardous Design Feature	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Emergency Access	**Program-Level** Significant **Project-Level** Significant **Cumulative** Not cumulatively considerable	**Program-Level** TRA-1 On-Campus Construction Traffic Management Plan **Project-Level** TRA-1 On-Campus Construction Traffic Management Plan **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Tribal Cultural Resources			
Tribal Cultural Resources	**Program-Level** Significant **Project-Level** ***Building A Expansion:*** Significant ***Performing Arts Center:*** Significant	**Program-Level** CUL-5 Cultural Resources Monitoring Program CUL-6 Procedure for Inadvertent Discovery of Human Remains **Project-Level** ***Building A Expansion***: CUL-5 Cultural Resources Monitoring Program CUL-6 Procedure for Inadvertent Discovery of Human Remains ***Performing Arts Center***: CUL-6 Procedure for Inadvertent Discovery of Human Remains	**Program-Level** Less than Significant **Project-Level** ***Building A Expansion***: Less than Significant ***Performing Arts Center***: Less than Significant

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
	North Campus Athletic Fields: Significant **Cumulative** Not cumulatively considerable	***North Campus Athletic Fields***: CUL-5 Cultural Resources Monitoring Program CUL-6 Procedure for Inadvertent Discovery of Human Remains **Cumulative** No mitigation is required.	***North Campus Athletic Fields***: Less than Significant **Cumulative** Not cumulatively considerable
Utilities and Service Systems			
Relocation or Construction of Utilities	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Water Supplies	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wastewater Treatment	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Solid Waste Generation	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

Environmental Topic	Impact Conclusion Prior to Mitigation	Mitigation Measure(s)	Impact Significance After Mitigation
Solid Waste Regulations	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wildfire			
Emergency Plans	**Program-Level** Significant **Project-Level** Significant **Cumulative** Not cumulatively considerable	**Program-Level** TRA-1 On-Campus Construction Traffic Management Plan **Project-Level** TRA-1 On-Campus Construction Traffic Management Plan **Cumulative** No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Wildfire Risks	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Infrastructure Installation	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable
Runoff, Post-Fire Slope Instability, or Drainage Risks	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable	No mitigation is required.	**Program-Level** Less than Significant **Project-Level** Less than Significant **Cumulative** Not cumulatively considerable

ES.5 Project Alternatives

The following alternatives are analyzed in detail in Section 6.0, *Project Alternatives*, of this PEIR. The objective of the alternatives analysis is to consider a reasonable range of potentially feasible alternatives to foster informed decision-making and public participation in the environmental review process. The alternatives considered to the proposed project are summarized below, followed by a discussion of the environmentally superior alternative.

ES.5.1 Alternatives Evaluated in Detail

ES.5.1.1 No Project Alternative – Near-Term Projects Only

CEQA Guidelines Section 15126.6(e) requires evaluation of a "no project" alternative to consider what would be reasonably expected to occur if the project were not approved. A no project alternative that results in no new campus development is not reasonably foreseeable, in part due to funding obligations for the bonds that have already been sold or are authorized to be sold under Measure HH. Further, as bond sales authorized by Measure HH have occurred, the District is obligated to use those funds for projects or purposes listed in the Measure HH ballot measure and/or subsequent bond sale. Without additional funding beyond the bond sales authorized by Measure HH, the long-term projects identified in the approved FMP would not be constructed. Therefore, under this No Project Alternative, only the near-term projects would be implemented: Building A Expansion, Performing Arts Center, and North Campus Athletic Fields. These projects total approximately 133,800 GSF of new construction and 43,317 GSF of demolition, resulting in a net increase of 90,483 GSF of campus building space compared to the net increase of 221,438 GSF anticipated with the project. Under this alternative, no new parking structures would be constructed.

With this alternative, campus operations would continue as they do under baseline conditions. No new buildings or other improvements planned in the FMP and requiring discretionary approval by the District other than the near-term projects would be constructed. However, minor and ongoing maintenance of existing facilities and infrastructure that do not require District discretion or environmental review could continue. Such projects could involve replacement of broken equipment or features, repainting, or movement of campus functions between existing spaces.

As student growth is anticipated to continue as a result of increases in the regional population and demand for community college courses rather than in connection with upgraded facilities or new programming, the growth in student enrollment considered as part of the project in this PEIR could continue; however, some of this growth may instead be accommodated through online enrollment. Under this alternative, the ability for students to enroll in on-campus courses could be limited by the use of existing facilities, which would remain generally in their existing conditions, and the near-term project facilities.

ES.5.1.2 Historic District Preservation Alternative

The Historic District Preservation Alternative would not include alterations to the San Diego City College Campus Expansion Historic District and its contributing resources identified as having the potential to be affected by future projects under the FMP (refer to Section 3.4, *Cultural Resources*). The five contributing buildings for the historic district are: the Creative Arts building (Building C), Saville Theatre, Building D, Academic Success Center (Building L), and Facilities & Student Affairs (Building M). The three

contributing structures/plazas are the pedestrian stairs and walkway leading to Building C, Curran Plaza, and Gorton Quad. Repairs to these resources that maintain the integrity of the historic district and its character-defining features could continue.

Avoidance of the contributing resources to the San Diego City College Campus Expansion Historic District would exclude the Building A Expansion and Performing Arts Center projects in the near-term and the projects within Gorton Quad in the long-term. While elimination of these two near-term projects was considered infeasible for the purposes of the No Project Alternative, it is assumed that for the purposes of protecting historic resources the District could decide that the Measure HH bond funds would instead be used for other FMP projects listed in the bond measure that are currently unfunded (Instruction and Fitness Center; Parking Structure and Tennis Courts; Classroom, Office, and Parking Structure; Faculty Office Addition; Parking Structure, Student Café, and Student Commons; and Amphitheater). The Parking Structure, Student Café, and Student Commons project proposed in the Library and Arts district of campus would be adjacent to the Creative Arts and Saville Theatre (Building C) and may require a shift in footprint or other alterations to avoid impacts to these resources but is assumed to continue as a long-term project for the purpose of this alternative. The remaining improvements total approximately 195,800 GSF of new construction and 16,698 GSF of demolition, resulting in a net increase of 179,102 GSF of campus building space compared to a net increase of 218,538 GSF anticipated with the project. Under this alternative, the total parking spaces created and on-campus student enrollment growth could remain the same as proposed with the project.

ES.5.2 Comparative Environmental Analysis

Detailed analysis of each alternative is provided in Section 6.0, *Project Alternatives*, of this PEIR. Table ES-2, *Comparison of Project and Alternatives Impacts*, provides a comparative summary of the project and alternatives with the purpose of highlighting whether each alternative would result in a similar, greater, or lesser impact than the project.

Table ES-2
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Issue Areas with Potential for Significant Impacts under the Project	Facilities Master Plan (Project)	Alternatives	
		No Project Alternative (Near-Term Projects Only)	Historic District Preservation Alternative
Aesthetics			
Light and Glare	LTSM	LTSM<	LTSM<
Biological Resources			
Special-Status Species	LTSM	LTSM<	LTSM<
Cultural Resources			
Historic Resources	SU	SU<	LTS<
Archaeological Resources	LTSM	LTSM<	LTSM<
Human Remains	LTSM	LTSM<	LTSM<
Geology and Soils			
Paleontological Resources	LTSM	LTSM<	LTSM<
Hazards and Hazardous Materials			
Emergency Response and Evacuation Plans	LTSM	LTSM<	LTSM<
Hydrology and Water Quality			
Drainage Patterns	LTSM	LTS<	LTSM=

Issue Areas with Potential for Significant Impacts under the Project	Facilities Master Plan (Project)	Alternatives	
		No Project Alternative (Near-Term Projects Only)	Historic District Preservation Alternative
Inundation	LTSM	LTS<	LTSM=
Noise			
Increase in Ambient Noise Levels	LTSM	LTSM<	LTSM<
Ground-Borne Vibration	LTSM	LTSM<	LTSM<
Transportation			
Emergency Access	LTSM	LTSM<	LTSM<
Tribal Cultural Resources			
Tribal Cultural Resources	LTSM	LTSM<	LTSM<
Wildfire			
Emergency Plans	LTSM	LTSM<	LTSM<

SU = significant and unavoidable impact; LTSM = less than significant impact with mitigation; LTS = less than significant impact
< represents reduced impact relative to the project
= represents same/similar impacts relative to the project

ES.5.3 Environmentally Superior Alternative

An EIR is required to identify an environmentally superior alternative among the alternatives analyzed. The environmentally superior alternative is typically the alternative having the fewest significant environmental impacts or having the greatest ability to avoid or substantially reduce significant environmental impacts associated with the project. If the No Project Alternative is identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) also requires that the EIR identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives, the Historic District Preservation Alternative is identified as the Environmentally Superior Alternative. The Historic District Preservation Alternative would eliminate the project's significant and unavoidable impact associated with historic resources. The significant but mitigated impacts related to hydrology and water quality would remain similar to the impacts of the project while the severity of the remaining impacts that were determined to be less than significant with mitigation under this alternative would be reduced compared to the impacts of the project due to the reduction in construction. Out of the ten stated objectives, the Historic District Preservation Alternative would be able to fulfill three objectives, partially fulfill four objectives, and not fulfill three objectives.

ES.6 Areas of Known Controversy and Issues to be Resolved

CEQA Guidelines Section 15123 requires that an executive summary of an EIR include areas of controversy known to the Lead Agency, including issues raised by other public agencies and/or the public. A Notice of Preparation (NOP) was circulated to solicit agency and public comments on the scope and content of the environmental analysis with a comment period from December 5, 2025, through January 5, 2026. Comments received during the NOP public scoping period were considered during the preparation of this PEIR. Comments addressed topics including cultural resources, transportation, and tribal cultural resources. A copy of the NOP and comments received during the NOP review period are contained in Appendix A to the PEIR.

An EIR is an informational document intended to inform the public agency decision makers and the public of the significant effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The issues to be resolved by the decision makers for the proposed project include the choice among alternatives and whether or how to mitigate the significant effects. Table ES-1 identifies potential environmental effects of the proposed FMP at the program-level and project-level as well as feasible mitigation measures that could reduce or avoid the identified environmental impacts. Section ES.5, *Project Alternatives*, above describes potential alternatives to the project that avoid or reduce environmental impacts associated with implementation of the project.

The District Board of Trustees must decide how to reduce significant and unavoidable environmental impacts of the project to the maximum extent feasible while achieving project objectives, through the adoption of mitigation measures and/or alternatives to the project identified in this PEIR. In approving the project or an alternative, the District Board of Trustees would be required to certify the Final PEIR, determine whether and how to mitigate significant impacts, and adopt associated Findings and a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15091 for the significant and unavoidable cultural resources (historic resources) impact identified in the PEIR. In addition, the Board of Trustees must determine if the potentially significant impacts associated with aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, transportation, tribal cultural resources, and wildfire have been mitigated below a level of significance. Lastly, the decision makers must determine whether the project alternatives would substantially reduce significant effects while still meeting key objectives of the project.

1.0 INTRODUCTION

This Program Environmental Impact Report (PEIR) has been prepared to evaluate the potential environmental impacts associated with the City College Facilities Master Plan (FMP; project) in accordance with the California Environmental Quality Act (CEQA). The FMP proposes a series of physical improvements across the campus that would accommodate anticipated enrollment increases and assist the San Diego Community College District (District) in meeting its educational and programming goals for San Diego City College (City College). Refer to Section 2.0, *Project Description*, for further discussion of the proposed project site and specific project components.

The District serves as the Lead Agency for the City College FMP PEIR. The District is governed by the Board of Trustees, which has the principal responsibility for approving campus planning documents and contracts for construction of new campus development. The purpose, scope, and organization of the PEIR are described below along with an overview of the environmental review process and information on responsible and trustee agencies.

1.1 Purpose of the PEIR

In compliance with CEQA, the purpose of this PEIR is to provide the District Board of Trustees and the general public with information concerning the potential environmental impacts associated with implementation of future projects identified in the FMP. This PEIR assesses impacts that would result from project implementation, presents mitigation measures that would avoid or reduce impacts deemed to be significant, and provides analysis of alternatives that would reduce or avoid significant environmental impacts. The PEIR provides an opportunity to consider both the programmatic effects of the FMP and the project-specific information needed for the District and responsible agencies to consider in issuing permits or approvals required for campus projects. Once certified, this PEIR would serve as the programmatic environmental document for the campus, enabling future projects to tier from the analysis in accordance with the subsequent review standards of CEQA.

As a public higher education provider, the District is subject to Public Resources Code (PRC) Section 21080.09, which specifies how CEQA applies to long range development plans and approval of campus projects. According to PRC Section 21080.09:

- A “long range development plan” is defined as a physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education.

- The selection of a location for a particular campus and the approval of a long range development plan are subject to CEQA and require the preparation of an Environmental Impact Report (EIR). Environmental effects relating to changes in enrollment levels shall be considered in the EIR, though enrollment or changes in enrollment by themselves do not constitute a project under CEQA.

- Approval of a project on a campus is subject to CEQA but may be addressed in a tiered environmental analysis based on a long range development plan EIR.

Preparation of this PEIR satisfies the requirements of PRC Section 21080.09 for the District to consider the environmental impact of academic and enrollment plans in addition to providing the environmental analysis required by CEQA for physical construction projects anticipated to occur on campus. The Lead Agency (i.e., the District) is required to consider the information in this PEIR, along with other relevant information, in making its decisions on approval of projects implemented under the FMP.

1.2 Scope and Intended Use of the PEIR

The FMP is a planning framework and conceptual land use plan that would guide the physical development of the campus. While it identifies potential projects to be undertaken on campus, it is not an implementation plan and its adoption does not constitute a commitment to specific project designs, construction schedules, or funding priorities. Rather, the FMP describes potential projects for the campus that would assist City College in meeting its educational and programming goals. Except for those projects specifically analyzed at the project level in this PEIR as described below, each development proposal undertaken as part of implementing the FMP must be approved individually at the appropriate level within the District and the approval must comply with CEQA. Therefore, this is a PEIR, as defined in CEQA Guidelines Section 15168, that evaluates the effects of implementing the FMP at a program level.

As provided in CEQA Guidelines Section 15168(a), a PEIR may be prepared for a series of actions that can be characterized as one large project and are related geographically, as logical parts in a chain of contemplated actions, in connection with the issuance of plans that govern the conduct of a continuing program, or as activities carried out under the same authority with similar environmental effects. The advantages of a PEIR are described in CEQA Guidelines Section 15168(b) and include the ability to provide a more exhaustive consideration of project effects, alternatives, and cumulative effects than might be possible in a project-specific EIR; to avoid duplication of basic policy considerations; and to provide the Lead Agency with the ability to consider broad program-wide policies and mitigation measures.

Three projects included in the FMP have identified funding from Measure HH and are in the early stages of the design process. Therefore, in addition to the program-level analysis of implementing the FMP as a whole, this PEIR analyzes these three near-term projects as specific development proposals at the project level. It is intended that the near-term projects would implement applicable mitigation measures identified within the project-level analysis while the program-level analysis and identified mitigation framework would be used for other future projects that require review for consistency with this PEIR. Those future projects considered at the program level may require additional or supplemental environmental review and analysis prior to approval and implementation in accordance with PRC Section 21166 and CEQA Guidelines Sections 15162 through 15164 and 15168.

1.3 Organization of the PEIR

This PEIR contains the information required to be included in an EIR by CEQA Guidelines Sections 15122 through 15131. In summary, the content and format of this PEIR are as follows:

- **Executive Summary.** Summarizes the proposed project, impacts of the project, proposed mitigation measures, alternatives considered and their resulting impacts, and issues to be resolved by the Board of Trustees.

- **Section 1.0, Introduction.** Provides an overview of the purpose, scope, and organization of the PEIR; the environmental review process; and information for responsible and trustee agencies.

- **Section 2.0, Project Description.** Includes a detailed discussion of the proposed project, including project objectives, anticipated growth, project characteristics, anticipated construction activities, and a description of future implementation actions.

- **Section 3.0, Environmental Analysis.** Contains the analysis of project effects to each environmental issue area, including a description of the existing setting, an overview of applicable regulations, the thresholds of significance, environmental impact analysis, and proposed mitigation measures, where applicable. The impact analysis in each environmental issue section is provided at the program-level for the FMP, at the project-level for the near-term projects, and for cumulative development.

- **Section 4.0, Effects Found Not to be Significant.** Provides a discussion of the potential environmental effects found not to be significant during initial scoping for the PEIR and briefly describes why those impacts would not be significant and, therefore, do not require a detailed evaluation in this PEIR. This section fulfills the requirements of CEQA Guidelines 15128. Other effects found not to be significant are summarized in the applicable portions of Section 3.0.

- **Section 5.0, Other CEQA Considerations.** Provides discussion of additional topics required by CEQA Guidelines Section 15126, including significant and unavoidable impacts, significant and irreversible effects, and growth-inducing effects.

- **Section 6.0, Project Alternatives.** Describes and evaluates alternatives to the proposed project that could reduce or avoid its significant environmental effects in accordance with CEQA Guidelines Section 15126.6.

- **Section 7.0, PEIR Preparers.** Identifies the persons who authored or participated in preparing this PEIR pursuant to CEQA Guidelines Section 15129.

- **Section 8.0, References.** Provides a list of reference materials used in preparation of this PEIR.

Technical studies supporting the analysis in this PEIR are summarized in the relevant portions of Section 3 and are appended in full to the PEIR, as follows:

- Appendix A – Notice of Preparation
- Appendix B – Air Quality and Greenhouse Gas Emissions Technical Report
- Appendix C – Biological Resources Technical Report
- Appendix D – Archaeological Technical Report
- Appendix E – Historic Resources Survey Report
- Appendix F – Geology and Soils Technical Study
- Appendix G – Paleontological Resources Technical Report
- Appendix H – Noise Technical Report
- Appendix I – Vehicle Miles Traveled Analysis

1.4 Environmental Review Process

1.4.1 Notice of Preparation

In response to its decision to prepare a PEIR, District staff prepared a Notice of Preparation (NOP) in compliance with CEQA Guidelines Section 15082 soliciting input on the scope and contents of the PEIR. The NOP was mailed to a distribution list consisting of relevant local agencies and submitted to the State Clearinghouse (SCH) for distribution to responsible, trustee, and other relevant state agencies. The NOP was also published in the San Diego Union Tribune newspaper and was made available electronically on the District Planning, Design, and Construction website. The 30-day comment period on the NOP commenced on December 5, 2025 and concluded on January 5, 2026. The NOP is provided in Appendix A of this PEIR, along with written comments received during the scoping period.

The District received two comment letters during the 30-day NOP comment period (Appendix A): one from the Native American Heritage Commission (NAHC) and one from the California Department of Transportation (Caltrans). The comment letter from the NAHC provided general information regarding the CEQA process, Assembly Bill (AB) 52, and Senate Bill (SB) 18, as well as NAHC recommendations regarding cultural resource assessments. The Caltrans comment letter noted that a Traffic Impact Study should be provided, outlined strategies to reduce vehicle miles traveled (VMT), and described Caltrans policies related to safety, complete streets, hydrology, and other review procedures that may apply to activities within Caltrans' right-of-way (ROW) as part of encroachment permit approval. Comments received during the scoping process have been taken into consideration during the preparation of this PEIR. Specific information related to the topics raised in these comments is provided in Sections 3.4, *Cultural Resources*, 3.15, *Transportation*, and 3.16, *Tribal Cultural Resources*.

1.4.2 Public Review of the Draft PEIR

Pursuant to CEQA Guidelines Section 15105, the Draft PEIR will be available for review and comment by the public and public agencies for a period of 45 days. The Notice of Availability for the Draft PEIR has been distributed in accordance with CEQA Guidelines Section 15087. Interested agencies and members of the public are invited to provide comments to the District on the analysis and content of the Draft PEIR. Public review of the Draft PEIR is intended to focus "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204).

Electronic comments are preferred and can be sent via email to SDCCDMeasureHH@sdccd.edu with the "Draft PEIR Comments for City College FMP" in the subject line. Electronic comments are preferred; however, written comments may also be submitted by mail to the following address, provided they are postmarked no later than the close of the public review period:

San Diego Community College District
Attn: City College FMP
1450 Frazee Road, Suite 500
San Diego, California 92108

The Draft PEIR and related technical studies are available for review during the public review period on the District's Planning, Design, and Construction website under the heading "Environmental Notices" at: https://www.sdccd.edu/departments/operations/construction/index.aspx.

Physical copies of the Draft PEIR are available for review at the following locations during typical hours of operation:

- District Planning, Design, and Construction Office at 1450 Frazee Road, Suite 500, San Diego, California 92108
- City College Library (Building R): 1313 Park Boulevard, San Diego, California 92101
- San Diego Central Library: 330 Park Boulevard, San Diego, California 92101

1.4.3 Publication of the Final PEIR

Following the public review period, the District, as Lead Agency, will provide responses to comments received on the Draft PEIR raising significant environmental issues per CEQA Guidelines Section 15088. Detailed responses to the comments received during public review will be provided in the Final PEIR along with a Mitigation Monitoring and Reporting Program. Findings of Fact and a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unmitigable will also be prepared as part of the PEIR finalization process.

The culmination of the environmental review process will be a public hearing on the proposed FMP and its Final PEIR. The Final PEIR will need to be certified by the District Board of Trustees as having been prepared in compliance with CEQA prior to making decisions related to the projects included in the FMP. As the FMP and individual projects are approved, the District Board of Trustees will also adopt all feasible mitigation measures identified in the PEIR and apply them as conditions of project approval.

A Lead Agency must file a Notice of Determination (NOD) with the County Clerk and SCH within five working days after approval of a project for which an EIR is prepared (PRC Section 21152). The NOD must be posted for 30 days and retained by the Lead Agency for 12 months. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

1.5 Responsible and Trustee Agencies

Under CEQA, state and local agencies other than the Lead Agency that have discretionary authority over a project, or aspects of a project, are considered responsible agencies. Federal agencies are not responsible agencies under CEQA. A trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California and would be affected by a project. The analysis and findings in this PEIR reflect the independent judgment of the District as the Lead Agency for the project; however, responsible and trustee agencies may use this PEIR to fulfill their environmental review obligations under CEQA when issuing permits or other approvals for the project.

No other public agency has discretionary authority over the FMP; however, some future projects implemented under the FMP may require discretionary approval from other public agencies. Other state and local public agencies that may have discretionary authority over future projects could include the City of San Diego (City), California Department of Fish and Wildlife (CDFW), Caltrans, San Diego County Air Pollution Control District (SDAPCD), and San Diego Regional Water Quality Control Board (RWQCB).

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2.0 PROJECT DESCRIPTION

2.1 Project Background

The San Diego Community College District is a community college district serving the City of San Diego (City) in central San Diego County (County). The District includes three credit colleges (San Diego City College, Mesa College, and Miramar College) and the state's only free-standing noncredit college (San Diego College of Continuing Education). The District is the third largest public community college district in California, serving approximately 90,000 students annually across these colleges.

City College is a public, two-year community college administered by the District. City College offers 250 majors and certificate programs across its five Schools: Arts, Humanities, Communication, and Telecommunication; Business, IT, Cosmetology, Engineering, and Trades; Health, Exercise Science, Nutrition, and Athletics; Mathematics, Sciences, and Nursing Education; and Behavioral and Social Science, Consumer and Family Studies.

2.1.1 City College Facilities Master Plan 2022 Overview

The FMP for City College describes the current status of the campus, summarizes its needs and goals, and outlines the common vision and purpose for its future. The FMP was approved on October 13, 2022, alongside an updated Educational Plan for 2022-2029. The FMP describes physical improvements required to achieve the strategic goals of the Educational Plan and to accommodate student growth. The designs and concepts presented in the FMP are conceptual and intended to serve as a framework for the future detailed design of campus improvements as funding becomes available.

2.1.2 Measure HH Funding

On November 5, 2024, San Diego voters approved Measure HH, authorizing the District to issue $3.5 billion in bonds for District facility upgrades. Based on the campus facility needs and potential improvements described in the master plan for each District campus, certain projects have been prioritized to move forward with initial funding from Measure HH bond sales. Three of these projects would be constructed at City College in the near term. Future bond sales authorized by Measure HH would fund additional improvements described in the FMP as well as the master plans for the other District campuses.

2.1.3 Campus Population Growth

The FMP establishes planning assumptions for future campus development based on projected enrollment and staffing needs. While the FMP identifies a maximum enrollment of 25,000 students based on enrollment projections first established in 2005, current enrollment and historic growth rates from 1973 through 2023 (approximately 1.4 percent per year on average; District 2024) do not demonstrate that reaching enrollment of 25,000 on-campus students is reasonably foreseeable within the next 20 years. This is particularly true as the addition of more online and hybrid course offerings in recent years has decreased the number of students who enroll in on-site courses. As of Fall 2025, 6,575 students were enrolled in on-site courses at City College. An additional 11,022 students were enrolled in either off-site programs (i.e., high school courses receiving District credits) or online courses. Students participating in off-site and online courses register online; some students may visit the campus one to

two times per semester, typically prior to on-campus courses starting and outside of peak on-campus hours. As these students do not regularly attend the physical City College campus, use campus facilities, or generate daily trips to campus, their enrollment does not contribute to campuswide operational impacts. Accordingly, under CEQA, these activities do not result in a direct physical change or a reasonably foreseeable indirect physical change in the environment and are not analyzed further. Thus, the environmental analysis in this PEIR focuses on the on-campus student population.

Although historic enrollment growth at the campus has averaged approximately 1.4 percent per year, this rate may not fully reflect future conditions. For purposes of this PEIR, a 1.5 percent annual growth rate has been selected to ensure that the environmental analysis accounts for reasonably foreseeable changes in enrollment and campus development over the next 20 years. This growth rate reflects the potential for attracting and accommodating additional students in on-campus courses through implementation of planned improvements to campus facilities, academic offerings, and student services, while also providing a conservative approach for environmental analysis and ensuring that the PEIR addresses potential impacts associated with continued on-campus enrollment growth. Applying an annual on-campus population growth rate of 1.5 percent, 8,856 on-campus students are anticipated to attend City College in 2045, an increase of 2,281 on-campus students compared to baseline (Fall 2025) conditions.

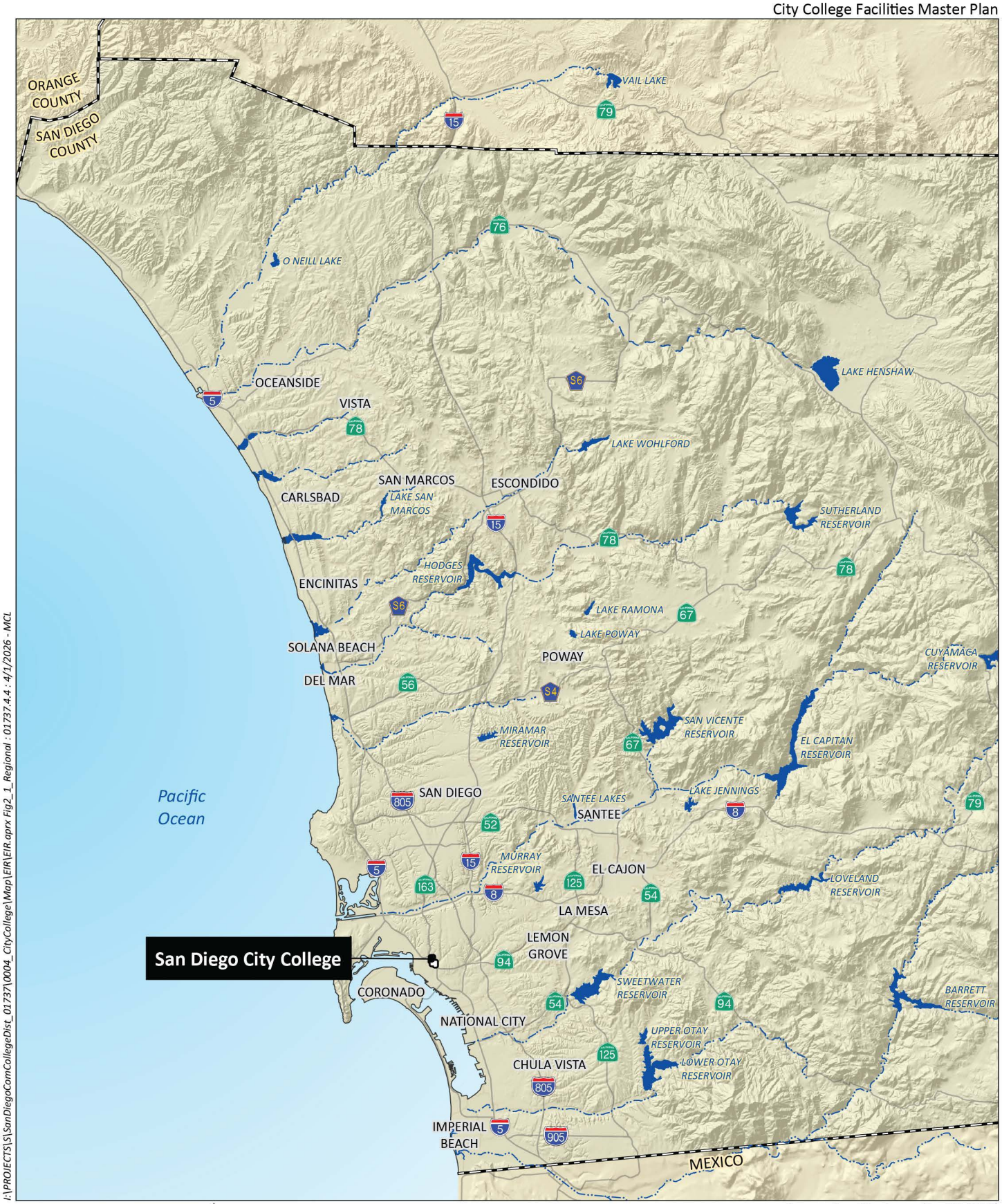
Employee growth is anticipated to maintain the current student-to-staff ratio, which reflects established operational standards for delivering academic programs and student services at City College. There were 1,652 total City College employees in July 2025 (District 2025). Assuming a proportional number of employees is required to serve the future student population, approximately 2,225 employees would be required in 2045. This represents an increase of 573 employees compared to baseline conditions.

2.2 Project Location and Setting

City College is located in the northeast corner of downtown San Diego. Downtown is generally bounded by San Diego Bay to the west and southwest and Interstate (I-) 5 to the north and east from Little Italy to the Coronado Bridge. Refer to Figure 2-1, *Regional Location*. City College is located in the northeast subdistrict of the East Village neighborhood of downtown, which is characterized by high-density residential development mixed with institutional uses, smaller hotels, and retail.

The City College campus consists of 40 buildings totaling approximately 1,344,512 gross square feet (GSF) across 44 acres with North Campus and South Campus separated by Park Boulevard and Russ Boulevard. San Diego High School is nestled between these two areas to the northeast. North Campus is bounded by I-5 on the north, Russ Boulevard on the south, Park Boulevard on the east, and State Route (SR) 163 on the west. South Campus is bounded by Russ Boulevard on the north, C Street and Broadway on the south, I-5 on the east, and Park Boulevard and 15th Street on the west. Refer to Figure 2-2, *Campus Boundary*.

Given the number of roadways adjacent to and within campus as well as surrounding highways, there are numerous vehicular access points to City College. Parking facilities contain 1,738 stalls and are generally located along the periphery of campus to encourage pedestrian movement across campus, although the high volume of vehicular traffic on roadways through campus presents pedestrian safety challenges. City College is also accessible via public transit. The City College Trolley station is located southwest of the Park Boulevard/C Street intersection and is served by the Blue, Orange, and Silver lines. Numerous bus lines also have stops at this location and/or along Broadway.



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0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 2-1



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Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Campus Boundary

Figure 2-2

2.3 Project Objectives

The fundamental purpose of the FMP is to guide the orderly and coordinated development of the City College campus to achieve District and campus program goals. The following project objectives have been identified for the purposes of CEQA:

1. Provide the facilities and infrastructure needed to accommodate projected enrollment through 2045.

2. Accommodate a diverse array of students and improve educational access for low-income and at-risk students, including single parents, foster youth, student veterans, and justice-impacted students, by providing affordable, on-campus housing and other supportive service programs.

3. Provide state-of-the-art general education, transfer, and career technical programs by using innovative technologies, teaching approaches, and instructional delivery systems.

4. Enhance City College as a "Unified Campus" with community gathering spaces, welcoming gateways, and a distinct campus identity.

5. Develop new campus facilities for programs currently relying upon facilities rated "Poor" or "Critical" on the Facility Condition Index.

6. Remove occupied building(s) from potentially active fault zones and reconstruct campus facilities outside of fault setbacks.

7. Improve campus accessibility and safety, including through the provision of wayfinding features, safe pedestrian routes, and sufficient parking for the campus population.

8. Physically connect City College to its surroundings in ways that promote community involvement while clearly distinguishing between welcomed public use and the established academic setting.

9. Incorporate sustainability features in future campus development and programming to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

10. Minimize the loss of instructional space and interruptions to campus activities during construction.

2.4 Project Components

The FMP is a planning framework and conceptual land use plan that guides campus development. It identifies potential projects support City College's educational and programming goals but does not commit the District to specific project designs, construction schedules, or funding priorities. Specific project designs, building footprints, architectural details, circulation and parking improvements, infrastructure alignments, and operational characteristics would be refined during future planning and design phases, along with final programming, departmental assignments, and internal space allocations.

Based on the concepts presented in the FMP, the following sections describe potential campus-wide improvements, near-term projects, and long-term projects. Adjustments to the specific details of the projects described below are anticipated to occur throughout future planning and design phases of individual development projects. These projects would remain within the scope of the project covered by the PEIR provided such refinements remain within the general development envelope and land use assumptions evaluated in this PEIR. References to the "program-level" components and associated analyses refer to the FMP as a whole, including campus-wide improvements, near-term and long-term projects, and potential on-campus enrollment growth. References to the "project-level" components and analyses refer to the three near-term projects described in Section 2.4.3 below.

2.4.1 Master Plan Overview

Based on current campus challenges and anticipated growth, the FMP recommends a series of improvements across the City College campus. The campus is generally assigned the following land uses, although in providing an integrated campus, some areas may overlap:

- Academic: Academically-oriented buildings, which could include classrooms or other student spaces, office and faculty/staff spaces, assembly spaces, lobbies, dining facilities, lockers, or bookstores.

- Housing: Encompasses all associated facilities for student housing, such as dining, assembly, recreation, or spaces of inhabitation.

- Parking Structure: Represents above-ground, below-grade, or a combination of structure types.

- Seeds: Outdoor planting and farm space specific to the Seeds@City sustainable agriculture program.

- Other: Represents third-party or otherwise leasable space, which are areas of opportunity for collaboration in future development.

As noted above, the FMP is conceptual in nature and future refinements to exact building designs would occur during future project planning and implementation phases. The improvements described below total approximately 366,800 GSF of new construction and include 680 parking spaces. These projects would require demolition of 148,262 GSF of existing buildings, resulting in a net increase of 218,538 GSF of campus building space. Refer to Figure 2-3, *FMP Project Locations*, for an overview of proposed locations for these improvements. While recommendations are described individually in the following sections, the intention of the FMP is to develop a campus that works holistically and seamlessly to achieve campus goals. The exact architectural programming and design of each project would be developed during project implementation in coordination with user groups.

While the FMP was developed alongside the 2022-2029 Educational Plan for City College, it is not anticipated that all improvements recommended by the FMP would be constructed within this time period. Section 2.4.3 below describes projects from the FMP that are anticipated to be constructed in the near term as they have identified funding and are in the design process. No specific timing or phasing is identified for the remaining campus-wide improvements and long-term projects described in Sections 2.4.2 and 2.4.4, respectively. These improvements would be designed and implemented as funding is available and program needs are reprioritized.



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0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

FMP Project Locations

Figure 2-3

2.4.2 Campus-Wide Improvements

The FMP identifies categories of campus-wide projects that would improve circulation and utilities across campus consistent with the vision of the FMP. These improvements could be incorporated into specific projects or as holistic campus improvement programs.

Related to utilities, campus-wide infrastructure improvements may include replacement, relocation, or upgrade of existing utility, drainage, circulation, accessibility, safety, and technology systems to support future campus development, primarily with construction of new facilities. The campus utility plant supplies heating and cooling to campus buildings and would be upgraded as needed to provide sufficient capacity to continue serving new building demand. As part of the campus goals to become more sustainable, ongoing improvements would occur for water demand efficiency, waste management, power generation, telecommunication infrastructure, and outdoor lighting.

Pedestrian improvements across campus may include crosswalk alterations, curb bulbouts, fire lane enhancements, and bridges across roadways. New campus signage, art, and wayfinding signage would also be incorporated across the campus. In addition to the specific parking structure improvements described below, campus parking improvements may also include new or adjusted surface parking facilities intended to support campus operations and evolving transportation needs. Final parking counts and configurations, or re-configurations necessitated by development projects, would be determined during future project design and implementation.

Interior renovations to accommodate programming adjustments, enhance technology, upgrade mechanical systems, or improve building accessibility could occur throughout existing campus buildings. Minor construction would also occur to repurpose existing exterior areas for outdoor classrooms, study areas, or leisure seating.

2.4.3 Near-Term Projects

The Building A Expansion, Performing Arts Center, and North Campus Athletic Fields projects described below are anticipated to be constructed in the near term as they have identified funding and are in the design process. These three projects are collectively considered the “project-level” components and analyzed in more detail throughout the PEIR. Refer to Section 3.0, *Environmental Analysis*, for further detail. As noted in Section 2.4.3.4, below, the Affordable Student Housing project has been separately evaluated and approved, and is not included in the analysis of project-level components.

2.4.3.1 Building A Expansion

A new addition to Building A is proposed to replace the existing 32,399-GSF D Building, which contains the campus bookstore and dining facilities adjacent to Gorton Quad. The proposed building would be approximately 110,000 GSF and would accommodate a mix of student support, administrative, dining, and campus-serving functions. The Building A expansion would be designed in coordination with the existing Building A facilities, similar to the existing integration with D Building. Reconfiguration of landscape and hardscape throughout Gorton Quad would occur as part of the Building A Expansion project to accommodate revised circulation patterns to the proposed building entries while also providing new outdoor gathering areas.

2.4.3.2 Performing Arts Center

Saville Theatre is proposed to be replaced with an expanded and upgraded building including theater space and new dance and music rooms. The existing 10,000-GSF theater would be demolished and an approximately 20,000-GSF Performing Arts Center, inclusive of a new theater, would be constructed. The new Performing Arts Center would have a street-level lobby space, a widened proscenium arch in the theater, connection to a future exterior amphitheater, and rooms for dance and music programming.

2.4.3.3 North Campus Athletic Fields

Near-term improvements to athletic facilities on North Campus would include the addition of sand volleyball facilities and renovations of existing softball and soccer fields. North of the existing tennis courts, new sand volleyball courts are proposed.

Improvements to the Betty Hock Softball Field would include rotation of the field to the optimal north-northeast direction and construction of new dugouts, an announcer's booth, a backstop, batting cages, and bullpens. A new 1,800-GSF field house would also be constructed adjacent to both the softball field and volleyball courts, containing restrooms and storage rooms. Lighting would also be installed at the softball field and volleyball courts to allow evening usage. Light poles would be up to 80 feet in height and lights would result in approximately 50 foot-candles.

Improvements to the soccer field, which is separated from the rest of North Campus by a freeway on/off ramp and accessible via a concrete underpass, would include a walk-jog path, a new 1,800-GSF field house containing restrooms and storage space, and a 200-GSF announcer's booth. The existing 918-GSF field house would be demolished. The soccer field would be replaced in its entirety, including new irrigation and a widened configuration to meet standard collegiate soccer pitch dimensions. Consistent with lighting described above, light poles up to 80 feet in height with lights resulting in approximately 50 foot-candles would be installed at the soccer field to allow evening usage.

2.4.3.4 Affordable Student Housing

The District Board of Trustees approved a Development Agreement for the area northeast of the C Street/16th Street intersection to be developed with a 797-bed affordable student housing building with associated student amenities and outdoor use areas in November 2024, also referred to as 16th and C in Section 2.4.4.5 below. A subsequent revision to the development proposal includes installation of a linear generator within the parking area north of the Science Building (Building S) to provide electrical load flexibility. While this project would be constructed on campus in the near term, no further project-level analysis for impacts associated with developing this site is provided in this PEIR as the Affordable Student Housing project has previously undergone environmental review under CEQA and a Notice of Exemption was approved along with approval of the Development Agreement on November 7, 2024.

2.4.4 Long-Term Projects

The following long-term improvements are described within five campus planning areas as organized in the FMP. Individual project locations within these planning areas are shown on Figure 2-3. While some components described below are interconnected, the FMP components are described geographically or as distinct projects for clarity; however, this organization is not intended to convey that development of each campus area would occur as a single project or at a specific time. The District may undertake future

projects that incorporate multiple components at once, or that implement only portions of the projects described below at a given time.

2.4.4.1 North Campus Part I

The primary improvements proposed in the long-term for the athletics portion of North Campus are a new instruction and fitness center and a new parking structure with associated tennis courts. Other alterations proposed in this area include the addition of trees along Park Boulevard as well as the freeway on/off ramp. At the intersection of Park Boulevard and the freeway on/off ramp, a widened pedestrian walkway would be incorporated with the updated landscaping. Associated lighting and signage improvements relative to the soccer field underpass may also be incorporated.

Instruction and Fitness Center

To provide space for improved and expanded athletics facilities, the area between the existing softball field and would be demolished. This includes demolition of the 11,894-GSF handball court building, 3,886-GSF Fitness Center (Building P-2), tennis courts, and surrounding surface parking.

The primary new structure proposed in this area is an approximately 37,000-GSF instruction and fitness center building that would provide practice and training areas, classrooms, suites, meeting rooms, and conference rooms. Between this facility and the existing Athletics, Exercise Science, and Health building (Building P), a plaza would be provided for athletic programming. A new digital marquee to advertise events is proposed on or near this building.

Parking Structure and Tennis Courts

Tennis courts would be constructed atop a new 500-space, multi-level parking structure. The parking garage would be accessible to vehicles via a driveway on Park Boulevard leading to a small surface lot with loading areas and the parking garage. A pedestrian connection (stairs and/or ramp) from the parking garage to the softball field level would also be constructed. A new approximately 5,000-GSF locker room facility would be constructed at the lower softball field level west of the proposed parking structure.

2.4.4.2 North Campus Part II

Urban Discovery Academy currently leases the existing building south of the Harry West Gym (Building P-3) and no change to the existing structure is proposed. The following improvements would occur in the surface parking area south of this building.

Classroom, Office, and Parking Structure

Existing surface parking and landscaped areas south of the existing building are proposed for replacement with an approximately 105,000-GSF classroom and office building above two levels of parking. The parking portion of the building would have approximately 80 parking spaces as well as secure bicycle storage. It would be accessible via the two existing curb cuts on Russ Boulevard and could provide access to separate levels of parking for different user groups (City College and Urban Discovery Academy or new tenant). Trees along Park Boulevard are also proposed to continue the landscaping improvements along this roadway described above.

A bridge connecting the new building to Gorton Quad across Park Boulevard is proposed to increase connectivity between North Campus and South Campus. The height of the newly proposed building at the south end of North Campus would allow for adequate vehicular clearance on Park Boulevard below, while increasing pedestrian safety by separating people from the road. A connection to San Diego High School is also possible, if desired by San Diego High School.

At the eastern side of the proposed pedestrian bridge, Russ Boulevard is proposed to be closed for public vehicular access. A vehicle turnaround would be provided and maintenance access would be maintained. In place of the existing roadway, new green space would be provided in connection with the academic lawn to the south.

2.4.4.3 Gorton Quad

Gorton Quad generally provides community-oriented services as a major campus entry and connector of North Campus and South Campus. Improvements to Gorton Quad would occur as part of the Building A Expansion project in the near team (refer to Section 2.4.3.1), while long-term improvements involve removing existing facilities (Building M) from fault lines within this area. As described in Section 2.4.4.2 above, a pedestrian bridge across Park Boulevard would improve connectivity from North Campus to South Campus. A pedestrian bridge would also be constructed across B Street, connecting Gorton Quad with the library level of the Learning Resource Center (Building R).

A small extension to Gorton Quad is proposed in the northwest corner to incorporate additional green space created by the Russ Boulevard reconfiguration. Columns and new trees along Park Boulevard may also be added to differentiate campus from adjacent development.

East Village Middle College High School

Demolition of the existing 8,602-GSF East Village Middle College High School building is proposed. An approximately 20,000 GSF building, including a dedicated outdoor classroom space, would be constructed in its place for continued East Village Middle College High School programming. This building would also have a rooftop green terrace and café accessible from Gorton Quad.

Maintenance/Operations and Seeds@City Buildings

The 80,563-GSF Student Affairs building (Building M) is proposed for demolition based on geologic risks. Outside of established setbacks from fault lines, this area would be redeveloped with an approximately 13,000 GSF building for Maintenance and Operations offices and Seeds@City classrooms and offices as well as an 8,000-GSF building for Maintenance and Operations storage and parking. Seeds@City terraces would be provided between these buildings and outdoor classroom space would be provided on the rooftop of the storage building.

2.4.4.4 Library and Arts

In the Library and Arts area, surface parking would be eliminated and replaced with mixed-purpose buildings and outdoor use areas described below. The pedestrian bridge connecting to Gorton Quad described above would improve access to these buildings from the areas north of B Street. Consistent with Gorton Quad improvements along Park Boulevard, trees would be planted and columns could be added along the western edge of the academic lawn west of Building R. A raised and widened crosswalk across B Street is also proposed to slow traffic and improve pedestrian safety.

Faculty Office Addition

Building R would remain but with an approximately 5,000-GSF addition for new faculty offices constructed on the west side along with a reconfigured entrance to this building from the academic lawn to accommodate the addition. The remainder of the academic lawn would remain in place except for the addition of digital marquee signage to existing fencing near the Park Boulevard/C Street intersection.

Parking Structure, Student Café, and Student Commons

On the south side of Building R, the existing surface parking lot would be replaced with an approximately 40,000-GSF, multi-story structure containing vehicle parking, secure bicycle storage, a student café, and student commons. The parking portion of the building is estimated to provide 100 parking spaces.

Amphitheater

The surface parking and landscape areas between Building R and Building C (including the near-term Saville Theatre replacement) would be improved with an exterior amphitheater seating approximately 900 individuals and a tree canopy with potential for Seeds@City to expand planting into this area.

2.4.4.5 16th and C

The FMP describes development of the City block northeast of the C Street/16th Street intersection with a 600-bed affordable student housing tower, an office building, private development, and a recreation area. As described in Section 2.4.3.4, since approval of the FMP, the District Board of Trustees approved development of this site with a 797-bed affordable student housing building with associated student amenities and outdoor use areas. Given environmental review under CEQA for that project has been completed and no further office building or private development in this area under the FMP is anticipated, no further analysis for the 16th and C site is provided in this PEIR.

2.4.5 Development Characteristics

Pursuant to Government Code Section 53094, local City zoning and development regulations are not applicable to community college projects that enhance the District's ability to provide classroom education. As such, the FMP provides the applicable land use guidance for development within the City College campus.

The District Design Guidelines and Standards Manual provides District policy for design professionals and construction teams during the planning and design phases of renovation and construction projects in the District. It outlines design approach, space allocation, physical environment, materials, and system requirements. Building design and construction requirements of the California Building Code (CBC) apply to development in the District and are referenced throughout the District Design Guidelines and Standards Manual. Proposed variations to the District Guidelines and Standards are required to be submitted in writing to the District Architect for review and written approval prior to depicting such variations in design documents.

2.4.5.1 Sustainability Features

The Design Guidelines and Standards Manual provides District sustainability levels that are designed to recognize, measure, and promote sustainable practices across District campuses and facilities. All District projects, including new construction, major renovations, and modernization efforts, are required to incorporate the principles outlined in the sustainability levels and meet applicable local, state, and District-adopted sustainability policies. The Design Guidelines and Standards Manual provides a tiered rating system that encourages environmentally responsible design, construction, and operations, across the following categories: integrated project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation. Based on the points accumulated in each of these categories, projects and buildings earn a District sustainability rating.

In addition to the rating system for individual projects, some District-adopted sustainability standards apply to campus-wide development. These include requirements for each campus to facilitate and maintain an ongoing waste recycling program, use renewable woods, use low-emitting carpet cushion materials and backing certified by the Carpet and Rug Institute's Green Label Plus Program, and incorporate District Facilities Services program of green cleaning materials and techniques.

2.5 Master Plan Implementation

The FMP is a plan to guide campus development for the next approximately 20 years. Development projects would be brought forward individually to implement the FMP over time, and although the FMP and associated environmental analysis in this PEIR make informed estimations on the size and timing of potential future projects, these details may shift over time due to changes in resources and campus priorities. Each future campus development process would be required to undergo the District's project development process.

As project concepts envisioned in the FMP are prioritized and funded, further refinement of the plans occurs through the schematic design, design development, and construction document processes. Input gathered from campus users is considered in developing the proposed programming included in these plans. Utility demands are projected during project design to confirm that existing utility capacity is available to serve the development in combination with existing campus or adjacent development, or to identify improvements that would be required. Once construction documents are finalized with specifications, the building plans are reviewed and approved by the Division of the State Architect (DSA) for fire/life safety, accessibility, and structural code compliance.

Future projects would also require CEQA review. As described in Section 1.0, *Introduction*, one purpose of this PEIR is to provide a comprehensive, program-level analysis of potential environmental impacts associated with implementation of the FMP that may be relied upon for future tiered environmental review. As noted in CEQA Guidelines Section 15168(c), future projects would be evaluated in light of the PEIR to determine whether they are within the scope of the PEIR. Factors that are considered in making this determination may include the proposed land use, overall development density and intensity, physical location, and planned infrastructure. Future projects that are determined to be within the scope of the PEIR may use a written checklist or similar documentation to demonstrate that potential environmental effects were within the scope of the PEIR and determine the applicable mitigation measures. If a future project is determined to be outside of the scope of the PEIR, or would result in new

or more severe environmental effects than those analyzed in the PEIR, additional CEQA review may be required.

Each future development project would be subject to approval by the District Board of Trustees and/or the Chancellor, as appropriate. The Board of Trustees delegates authority for certain CEQA review and design decisions to the Executive Vice Chancellor of Operations, Enterprise Services, and Facilities. Approval by the Board of Trustees is anticipated for the long-term projects evaluated in this PEIR, whereas smaller maintenance, renovation, or replacement projects may be approved by the Executive Vice Chancellor depending on their associated contract value. Additional campus development projects not identified in the FMP would require Board of Trustees approval.

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3.0 ENVIRONMENTAL ANALYSIS

This section of the PEIR analyzes the potential environmental impacts that may occur as a result of project implementation. Sections 3.1 through 3.18 evaluate the environmental issues identified during the scoping process as having the potential for significant impacts and requiring further evaluation. The two environmental issue areas excluded from further analysis in this PEIR are Agriculture and Forestry Resources and Mineral Resources. These two subjects are discussed briefly in Section 4.0, *Effects Found Not to be Significant*. The environmental topics addressed in this section of the PEIR include:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Level of Analysis

As noted in Section 2.0, *Project Description,* different levels of detail exist for the various facilities and improvements that would occur on campus under the FMP. In general, there is more information available regarding the Building A Expansion, Performing Arts Center, and North Campus Athletic Fields projects, and less detail and certainty with respect to the long-term and campus-wide projects that may occur through buildout of the FMP over the next approximately 20 years. As a result, this PEIR assesses potential environmental impacts at different levels depending on the available information.

Program-Level

For each environmental issue area, potential impacts first are analyzed on a program-level basis for the FMP as a whole, including anticipated on-campus population growth where relevant. This program-level analysis takes a broader perspective based on the anticipated locations and types of the proposed campus facilities and related improvements. Those long-term projects or campus-wide improvements for which only a program-level analysis has been completed may require additional or supplemental environmental review and analysis prior to approval and implementation in accordance with Public Resources Code (PRC) Section 21166 and CEQA Guidelines Sections 15162 through 15164 and 15168.

Project-Level

Potential impacts are also analyzed on a project-level basis for the near-term projects for which there is sufficient information known about the proposed construction and operational activities (refer to Section 2.4.3). This analysis is more detailed and focused as it is intended to fully assess potential environmental impacts associated with the near-term projects. In accordance with CEQA, the near-term projects for which a project-level analysis has been completed within this PEIR would be subject to approval and implementation following certification of this PEIR.

Overview of the Environmental Analysis

Each of the following environmental analysis sections provides the environmental setting, regulatory framework, significance thresholds, program-level and project-level impact analysis, mitigation measures (if required), and cumulative impact analysis related to the environmental topic. The format of the discussion in each section is standardized as much as possible for ease of review. The subheadings are described in greater detail below.

Environmental Setting

According to Section 15125 of the CEQA Guidelines, an Environmental Impact Report (EIR) must include a description of the existing physical environmental conditions in the vicinity of the project site to provide the "baseline condition" against which project-related impacts are compared. The baseline condition is generally considered the physical condition that exists when the Notice of Preparation (NOP) is published. The NOP for the project was published on December 5, 2025, and the baseline conditions contained in this PEIR are generally taken from the Fall 2025 semester. However, the CEQA Guidelines and applicable case law recognize that the date for establishing an environmental baseline is not always rigid as physical environmental conditions may vary over time. Therefore, the use of environmental baselines that differ from the date of the NOP can be reasonable and appropriate when conducting environmental analyses, as is the case in some sections of this PEIR.

Regulatory Framework

The Regulatory Framework subsection provides a summary of regulations, plans, policies, and laws that are relevant to each issue area at the federal, state, regional, District, and local levels. It is important to note that a community college district is afforded unique discretion when developing educational facilities. When developing a facility that furthers its educational objectives, a community college district may take action (a two-thirds vote) pursuant to Government Code Section 53094 to exempt a proposed project from the zoning ordinances of the jurisdiction in which the project is located. Therefore, the majority of District projects are not subject to local City of San Diego (City) land use or development regulations. Where such local regulations are discussed in this subsection, their relevance to the environmental issue area or thresholds of significance is also described. In general, such regulations may be used for background information or for the purpose of analysis in the absence of similar District-specific regulations; however, their use as guidance in establishing thresholds of significance for the purposes of this CEQA analysis does not change the applicability of such regulations to future District actions.

Thresholds of Significance

Thresholds of significance addressed in this PEIR are based on Appendix G of the CEQA Guidelines. The District has not adopted agency-specific CEQA Guidelines or associated thresholds of significance. In some cases, standards were developed specifically for this analysis or were taken from other agencies or entities. Some standards of significance are quantitative, while others are qualitative. Where additional regulations, standards of other agencies, or other guidance are used to determine the level of significance of impacts, these factors are described below the listed thresholds of significance from CEQA Guidelines Appendix G.

Impact Analysis

As previously described, the impact analysis in this PEIR is provided at the program level for the overall FMP and at the project level for select near-term projects. Refer to the discussion of Level of Analysis above for further explanation of the program-level and project-level analysis. Separate discussion of the specific near-term projects is provided within this subsection where the determination of significance or applicability of mitigation varies between the program-level analysis and project-level analysis or between the different near-term projects. Where the impact of the near-term projects does not differ from that of the program-level components or between the different near-term projects, the discussion may be combined or summarized collectively under the following subheadings.

Impact Discussion. As required by CEQA Guidelines Section 15126.2(a), project-related direct, indirect, cumulative, short-term (temporary), and long-term (permanent) effects on the environment are considered in this PEIR. The environmental changes identified throughout this PEIR are referred to as "effects" or "impacts" interchangeably. Direct impacts are those that would occur directly as a result of the proposed project. Indirect impacts represent secondary effects that would result from project implementation. Cumulative impacts are described further in the introduction to the cumulative impact analysis provided below. Where mandatory compliance with applicable regulations would avoid a significant environmental impact, the applicable regulatory criteria (laws, policies, regulations) and project-required implementing actions (if any) are also described.

Level of Significance Prior to Mitigation. A summarized impact statement is provided following the analysis for each threshold, specifying the program-level impact and impact for each near-term project where applicable. Where the impact discussion indicates an adverse environmental effect would occur, the impact is considered to be significant prior to mitigation. Where no impact or a less than significant impact is identified, no mitigation is required and the remaining subheadings are omitted.

Mitigation Measures. Where the analysis demonstrates that a physical adverse environmental effect could occur without undue speculation and after mandatory compliance with regulatory criteria, feasible mitigation measure(s) are recommended that could reduce or avoid the significant effect. Mitigation measure(s) must be fully enforceable, have an essential nexus to a legitimate governmental interest, and be "roughly proportional" to the impacts of the project. This section then specifies if the program-level mitigation measures apply to each of the near-term projects.

Level of Significance After Mitigation. Where mitigation measures were identified as applicable at either the program or project level, this subsection describes the level of impact significance after the implementation of those mitigation measures. In most cases, implementation of the mitigation measure(s) would reduce the adverse environmental impacts below a level of significance. If feasible mitigation is not available, the PEIR provides a discussion of the reasons why it is infeasible to further reduce the impact in support of a significant and unavoidable impact determination.

For the historic resources impact identified as significant and unavoidable, the District would be required to adopt a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093 if the Board of Trustees decides to approve the project despite its significant impact(s) to the environment. The Statement of Overriding Considerations would list the specific economic, legal, social, technological, and other benefits of the project, supported by substantial evidence in the project's administrative record, that outweigh the significant and unavoidable environmental impact to historic resources identified in the PEIR.

Cumulative Impact Analysis

CEQA requires that an EIR contain an assessment of the cumulative impacts that may be associated with a proposed project in addition to its project-specific impacts. As defined in CEQA Guidelines Section 15355:

> *'Cumulative Impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *a) The individual effects may be changes resulting from a single project or a number of separate projects.*
>
> *b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.*

In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion is guided by the standards of practicality and reasonableness.

In addition, Section 15130(a) of the CEQA Guidelines requires that EIRs discuss the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Therefore, the discussion of cumulative impacts in an EIR first evaluates whether the impacts of the project will be significant when considered in combination with past, present and future reasonably foreseeable projects. If a potentially significant cumulative impact would occur, the EIR considers whether the project would make a cumulatively considerable contribution to that cumulative impact. The CEQA Guidelines indicate that where a lead agency is examining a project with an incremental effect that is not cumulatively considerable, it need not consider the effect significant but shall briefly describe the basis for its conclusion. As further clarified by CEQA Guidelines Section 15065, "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.

The cumulative analysis contained in this PEIR assumes that all mitigation measures identified in the preceding impact discussion to mitigate potential impacts of the project are adopted. Therefore, the cumulative impact discussion analyzes whether, after adoption of the identified mitigation measures, the remaining impacts of the project in combination with the impacts of related projects would cause a significant cumulative impact or whether the project would have a cumulatively considerable contribution to an existing or anticipated cumulative impact.

Two approaches for cumulative impact analysis are provided in CEQA Guidelines Section 15130(b) and are referred to herein as the "list method" and the "projections method." The list method evaluates cumulative impacts based on a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency. The projections method bases the cumulative impact analysis on a summary of projections contained in an

adopted planning document that describes or evaluates conditions contributing to the cumulative effect.

Based on the long-term nature of the proposed FMP projects, this PEIR primarily uses the projections method for cumulative analysis. In some instances, there may be individual reasonably foreseeable projects with characteristics unique to the environmental issue being analyzed that deserve specific consideration; however, specific locations and components of projects that could be implemented in the region throughout the next 20 years are largely unknown. Therefore, the projections method is considered relevant for identifying potential development over this time period that could contribute to cumulative impacts when combined with the proposed campus projects.

Past and present projects are considered part of the baseline when evaluating project impacts. The District is in the process of analyzing master plan frameworks for each of its four campuses and would implement the proposed projects in addition to continuing to construct previously approved campus facilities. In progress development at City College includes the Affordable Student Housing project described further in Section 2.4.3.4, which is anticipated to be completed in mid-2028. Similar to the FMP, the master plans for Mesa College and Miramar College anticipate the replacement and expansion of existing facilities within their current campus boundaries and the accommodation of increasing on-campus enrollment at a rate of 1.5 percent per year. Modernization and expansion of existing College of Continuing Education facilities would occur on its seven existing campuses while a new property at 5322 El Cajon Boulevard would serve as an additional eighth campus for the College of Continuing Education.

Regarding off-campus development, consideration of projects that could be implemented under adopted land use plans, such as the City of San Diego General Plan and Downtown Community Plan, is considered sufficient to account for cumulative impacts from future reasonably foreseeable projects. Therefore, the projections method is the primary approach taken in the following sections, especially where the geographic scope of cumulative analysis is regional or citywide.

The appropriate geographic scope for cumulative impact analysis varies depending upon the specific environmental issue area being analyzed. The geographic scope defines the study area within which projects may contribute to a specific cumulative impact. For some issue areas, the cumulative study area may address regional or area-wide conditions, while for other issue areas the potential for cumulative impacts is limited to localized effects. The geographic scope of analysis for each environmental issue area is also described within the cumulative impact analysis.

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3.1 Aesthetics

This section addresses the potential aesthetics impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to aesthetics are also addressed.

3.1.1 Environmental Setting

3.1.1.1 Campus Visual Character

Landform

Elevations across the approximately 44-acre campus range from approximately 60 feet above mean sea level (AMSL) along the southeastern boundary of the project site, to a maximum of approximately 170 feet AMSL in the northernmost portion of the project site. This elevation change occurs gradually across the campus and the majority of campus appears flat with gentle slopes. The most noticeable slopes occur on North Campus where athletic fields occur downslope from the developed area surrounding the Handball Court building and the surrounding freeway segments and on/off ramps, including Interstate (I-) 5 on the north and State Route (SR) 163 on the west. South Campus is bounded by Russ Boulevard on the north, C Street and Broadway on the south, I-5 on the east, and Park Boulevard and 15th Street on the west. The elevated segments of I-5 along the eastern side of South Campus are dominant visual features that separate the project site from the community to the east as an elevated barrier, though underpasses provide east-west access at the ground level of campus.

Vegetation

The project site occurs in a highly urbanized area with minimal vegetation outside of landscaped areas, which primarily occur along freeway and roadway rights-of-way (ROWs) in the project vicinity. On-campus trees and open space are primarily focused along the Park Boulevard corridor. Landscaping is also integrated throughout the campus with small plazas, shaded walkways, and gathering areas between the campus buildings. As discussed further in Section 3.3, *Biological Resources*, no sensitive vegetation communities were identified on the campus or in the surrounding 100-foot buffer area, though planted Torrey Pine (*Pinus torreyana* ssp. *torreyana*) trees occur on campus.

Development

The City College campus is comprised of a mix of low to mid-rise academic buildings, athletic fields, and landscaped open spaces that together create a cohesive urban college environment. The existing campus is comprised of 40 buildings totaling approximately 1,344,512 gross square feet (GSF). A majority of the structures on the City College campus are modern concrete or steel-frame buildings with large windows and neutral exterior palettes dominated by light gray concrete, metal panels, and glass. North Campus is comprised of athletic fields and low-rise structures such as fields houses and the gym, while South Campus includes taller and more compact development comprised of mid-rise academic buildings. Various landscape features physically and visually connect the campus buildings.

3.1.1.2 Adjacent Land Uses

The campus is located within the downtown neighborhood of the City of San Diego (City), which encompasses approximately 1,500 acres and is bound by I-5 on the north and east and San Diego Bay on

the south and west. Specifically, the campus is located within the Northeast subdistrict of the East Village neighborhood of downtown, which is characterized by high-density residential development mixed with institutional uses, smaller hotels, and retail uses. Development immediately surrounding the campus is comprised of dense low- to high-rise development to the south and west comprised of a variety of architectural styles, including more modern development featuring glass and metal structures in addition to older brick structures.

The planned land uses that surround North Campus include I-5 and Existing Park/Open Space associated with Balboa Park to the north, Employment/Residential Mixed-Use to the south, Residential Emphasis to the west, and Public/Civil and Existing Park/Open Space associated with San Diego High School to the east. Planned land uses that surround South Campus include Public/Civil and Existing Park/Open Space associated with San Diego High School to the north, Neighborhood Mixed-Use Center and Employment/Residential Mixed-Use to the south, Residential Emphases to the west, and I-5 to the east.

3.1.1.3 Visual Resources

As discussed in the Downtown Community Plan (City 2006a), views and vistas of the San Diego Bay, Balboa Park, Coronado Bridge, parks, and landmark buildings are significant downtown assets. Distant views and a sense of expansiveness provide balance with the high development intensities that occur and are planned within the downtown area. The Downtown Community Plan designates view corridors and outlines design criteria to preserve and reinforce existing views of the water or of landmark buildings and establish new views as redevelopment along the San Diego Bay waterfront occurs. Downtown Community Plan policies related to views focus on streets and other public spaces, rather than on private views from buildings. There are no view corridors identified on or adjacent to the City College campus in the Downtown Community Plan. The nearest view corridors to the campus provide westerly views towards San Diego Bay and are identified along Broadway beginning at the intersection of Broadway and Park Boulevard, along Beech Street beginning at the intersection of Beech Street and 6th Avenue, and along Ash Street beginning at the intersection of Ash Street and 6th Avenue.

Distant and obscured views of the San Diego Bay and the Coronado Bridge are available from select areas of campus at higher elevations and from select roadways when looking towards the south and the west between mid and high-rise development located south of the City College campus. For example, the Coronado Bridge and San Diego Bay can be viewed at the intersection of 15th Street and C Street directly south of the Arts and Humanities Building (Building AH), and at the intersections of 14th Street and C Street and 13th Street and C Street south of the Learning Resource Center (Building R). While the San Diego Bay and Coronado Bridge are visual resources, the intermittent views available from these locations adjacent to campus are not significant viewpoints as the overall landscape is dominated by structures along the roadways. In contrast, the view corridors described above occur in closer proximity to the visual resources and are surrounded by structures that step back to allow expanded westerly and southerly views.

3.1.1.4 State Scenic Highways

The State Scenic Highway System includes a list of highways that are designated as scenic highways by the state or are eligible for that designation. The nearest designated state scenic highway to the campus is the portion of SR 163 through the west side of Balboa Park, which was designated due to its unique location through Balboa Park (City 2012). This portion of the designated state scenic highway terminates at I-5, approximately 600 feet northwest of the project site. Additionally, the northern edge of North

Campus and the eastern edge of South Campus are located adjacent to I-5, which is an eligible state scenic highway (California Department of Transportation [Caltrans] 2018). The campus is located in the viewshed of these designated or eligible state scenic highways, though views of the campus are not the reason for their designation or eligibility.

3.1.1.5 Light and Glare

Lighting effects are generally associated with the use of artificial light during the evening and nighttime hours. Generally, there are two primary sources of light: light emanating from building interiors passing through windows and light from exterior sources (i.e., street lighting, building illumination, security lighting, parking lot lighting, and landscape lighting). Light introduction can be a nuisance to adjacent residential areas, diminish the view of the clear night sky, and, if uncontrolled, can cause disturbances. Land uses such as residences and hotels are considered light-sensitive, since occupants have expectations of privacy during evening hours and may be subject to disturbance by bright light sources. Light spill is typically defined as the presence of unwanted light on properties adjacent to the property being illuminated. With respect to lighting, the degree of illumination may vary widely depending on the amount of light generated, height of the light source, presence of barriers or obstructions, type of light source, and weather conditions.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light by highly polished surfaces such as window glass or reflective materials and, to a lesser degree, from broad expanses of light-colored surfaces. Perceived glare is the unwanted and potentially objectionable sensation observed by a person as they look directly into the light source of a luminaire. Daytime glare generation is common in urban areas and is typically associated with buildings with exterior facades largely or entirely comprised of highly reflective glass. Glare can also be produced during evening and nighttime hours by the reflection of artificial light sources such as automobile headlights. Glare-sensitive land uses include residences, hotels, transportation corridors, and aircraft landing corridors.

The primary sources of light on campus and in the project vicinity include building lighting, street lamps, parking lot and similar security lighting, and headlights from vehicles traveling around the campus. City College offers evening classes and programming; therefore, light is emitted during the evening on campus under existing conditions. Similar existing sources of light and glare occur within the campus vicinity and include safety-oriented exterior and interior lighting sources produced from surrounding commercial and residential development. Car headlights, street lighting, and traffic signals are also present along roadways adjacent to campus. Campus buildings as well as surrounding development are not substantial sources of glare as structures are primarily finished with stucco or similar non-reflective materials. Glass is used in relatively small areas for windows or natural light and is not a substantial source of glare under existing conditions.

3.1.2 Regulatory Framework

A summary of state, District, and local regulations that pertain to aesthetics is provided below. No federal or regional regulations regarding aesthetics apply to the project.

3.1.2.1 State

California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California Legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. The designation of a highway as scenic is based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the travelers' enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

3.1.2.2 District

District Design Guidelines and Standards Manual

The 2025 District Design Guide and Standards Manual (District 2025) was prepared for use by the design professionals and construction teams during the planning and design phases of renovation and construction projects for the District. It outlines the design approach, space allocation, physical environment, materials, and system requirements, and provides technical standards that the design and construction teams will be expected to meet or exceed. The general criteria and standards provided in this manual apply to all campuses within the District, and specific requirements related to each campus are provided in individual campus guidelines and during the design process. Requirements related to aesthetics are outlined below.

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines Standard Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

Development of the District's Sustainability Plan included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. Each goal includes a Key Performance Indicator (KPI). These goals have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects, and include the following related to aesthetics.

Health and Wellbeing Goal 1. Design spaces that reduce stress, maintain emotional well-being, and promote recovery (e.g. social services, biophilic design, wellness spaces). **KPI:** Access to views, fresh air, natural light/materials, plants, flexibility, places to grow things, meditate, reset, affirming.

General Specifications

Section 2.2, of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with

the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs.

The General Specifications section includes specifications for the design and construction of buildings and structures on District properties that relate to maintaining aesthetic value and minimizing glare. This includes specifications for window shade devices that must provide solar control, glare reduction, and energy efficiency while maintaining visibility and natural daylighting; designing classrooms to minimize glare on whiteboards; and utilizing glare-resistant projection screens.

This section also requires contractors for District projects to prepare mock-ups, which are physical assemblies of construction elements designed to establish quality standards for site work, interior finishes, and exterior finishes. They serve as full-scale representations to verify material selection, assess workmanship, and ensure compliance with design intent prior to full-scale installation. Mock-ups are required for the following construction elements:

1. Site Work: Concrete finishes, paving, hardscapes.
2. Interior Finishes: Paint, wall finishes, flooring.
3. Exterior Finishes: Masonry, stucco, cladding, glazing systems.

3.1.2.3 Local (Non-Regulatory)

The District is not subject to municipal land use planning documents or development regulations in the zoning ordinance. However, as the City College campus is located adjacent to surrounding communities within the City, this analysis considers the aesthetics discussion contained in the City's General Plan and the Downtown Community Plan as well as the policies in the City's Land Development Code for informational purposes and community context.

City of San Diego General Plan

The City of San Diego General Plan (City 2024) includes a Citywide urban design strategy, goals, and policies regarding the physical features that define the character of a neighborhood or community. These goals complement the goals for pedestrian-oriented and walkable villages articulated in the City of Villages strategy upon which the General Plan is based.

Urban Design Element

The Urban Design Element of the General Plan establishes a set of design principles on which its policies are based and on which future public and private development physical design decisions can be based. Policies within this element generally direct growth into transit-oriented mixed-use and commercial areas, preserve and protect natural landforms and features, design streets to improve walkability, bicycling, and transit integration, and utilize sustainable building methods.

Conservation Element

The Conservation Element guides the sustainable management of the City's natural resources, with sections on open space and landform preservation, wetlands, and the urban forest. Policies call for the conservation of landforms, canyon lands, and open spaces that define the City's urban form, serve as core biological areas and wildlife linkages, or are wetland habitats. Policies related to wetlands require a watershed planning approach that preserves and enhances wetlands, and policies related to urban

forestry call for the planting of large canopy shade trees where appropriate and with consideration of habitat and water conservation goals, as well as the retention of significant and mature trees.

City of San Diego Land Development Code

The City's Land Development Code is a portion of the San Diego Municipal Code that contains numerous provisions to guide the design of development throughout the City. Through zoning and development standards, such as specified maximum building heights, maximum lot coverage, minimum and maximum floor-area-ratios, and yard setbacks, the Land Development Code provides restrictions on land development and design that affect visual quality and provide for consistent visual character among specific land use designations.

The Land Development Code also contains development restrictions and guidelines to protect and enhance Environmentally Sensitive Lands. Steep hillsides are defined as those with natural gradients equal to or in excess of 25 percent with a minimum elevation differential of 50 feet, or a natural gradient of 200 percent with a minimum elevation differential of 10 feet. San Diego Municipal Code Section 142.0101 et seq. contains grading regulations to address (among other things) landform preservation and requires that all grading be designed and performed in conformance with applicable City Council policies and the standards established in the Land Development Manual.

Downtown Community Plan

The Downtown Community Plan was adopted in April 2006 and contains guiding principles to ensure that intense development is complemented with livability through strategies such as the development of new parks and Neighborhood Centers, and emphasis on the public realm. The vision within the Downtown Community Plan is for downtown to contain a lively mix of uses in an array of unique neighborhoods, a refurbished waterfront, and a walkable system of streets. The Downtown Community Plan includes goals to link open spaces with new public parks and plazas, with Park Boulevard as the main "green link" connection between downtown and Balboa Park. The Downtown Community Plan additionally explores the idea of the construction of "lids" over I-5 to re-establish access to Balboa Park with new open space areas. Policies within the Downtown Community Plan regarding aesthetics that are relevant to the City College include the following (refer to Section 3.1.1.3 for a description of the view corridor locations):

Policy 5.1-P-4 Encourage City College and San Diego High to respect and continue street right-of-way alignments and not place buildings in those view corridors.

3.1.3 Thresholds of Significance

Thresholds used to evaluate potential aesthetics impacts are based on CEQA Guidelines Appendix G. A significant aesthetics impact could occur if implementation of the proposed project would:

1. Have a substantial effect on a scenic vista;

2. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway;

3. 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, conflict with an applicable zoning and other regulations governing scenic quality; or

4. Create new source of substantial light and glare, which would adversely affect day and nighttime views in the area.

3.1.4 Impact Analysis

3.1.4.1 Scenic Vistas

Threshold 1: Would the project have a substantial adverse effect on a scenic vista?

Impact Discussion

Program-Level

As discussed in the Downtown Community Plan (City 2006a), views and vistas of the San Diego Bay, Coronado Bridge, Balboa Park, parks, and landmark buildings are downtown assets. The Downtown Community Plan designates view corridors and outlines design criteria to preserve and reinforce existing views of these resources. View policies focus on streets and public spaces, rather than on private views from buildings. There are no view corridors identified in the Downtown Community Plan on the roadway segments adjacent to City College campus as existing development interrupts westerly and southerly views towards the San Diego Bay from these locations in the northeast corner of downtown. The nearest view corridors to the campus are west-facing view corridors designated along Broadway beginning at the intersection of Broadway and Park Boulevard (located approximately 390 feet south of South Campus), along Beech Street beginning at the intersection of Beech Street and 6th Avenue (located approximately 0.27 mile west of North Campus), and along Ash Street beginning at the intersection of Ash Street and 6th Avenue (located approximately 0.26 mile west of North Campus). Therefore, no conflict with Downtown Community Plan Policy 5.1-P-4, which encourages City College to maintain these corridors, would occur. In addition, there are distant views of the Coronado Bridge and San Diego Bay available from to the south and the west at select areas of higher elevation on campus and at street intersections through existing mid and high-rise development as discussed in Section 3.1.1.3. However, although views of these visual resources are visible from select locations on campus and at public intersections along the southern edge of South Campus, they are distant and somewhat obstructed; therefore, they are not within the roadways designated as view corridors within the Downtown Community Plan.

Proposed improvements implemented under the FMP would occur within the existing developed campus footprint and would replace or modernize existing facilities without expanding into visually sensitive areas. Although some new or renovated buildings may alter on-campus views, the structures which would be constructed in accordance with the FMP would not be of a height that is greater than the existing development on campus. As such, new development on the campus would not obstruct views from land uses in the surrounding area, and views of the Coronado Bridge and San Diego Bay would continue to be intermittently available but interrupted by surrounding buildings from areas surrounding campus. Therefore, implementation of the FMP would not have a substantial adverse effect on a scenic vista.

Project-Level

The near-term projects would be developed within the boundaries of the developed City College campus. As discussed in the program-level analysis above, there are no designated view corridors identified in the Downtown Community Plan in the vicinity of the campus though occasional views of the Coronado Bridge and San Diego Bay are available. However, none of the near-term projects would be of a height that is greater than the adjacent buildings on campus that they would replace. As such, development of the near-term projects would not obstruct views from land uses in the surrounding area. Therefore, implementation of the near-term projects would not have a substantial adverse effect on a scenic vista.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not have a substantial adverse effect on a scenic vista. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.1.4.2 Scenic Resources

Threshold 2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact Discussion

Program-Level

The nearest designated state scenic highways to the campus include the portion of SR 163 through the west side of Balboa Park, which is located just northwest of the project site across I-5. Additionally, North Campus is located south of I-5 and South Campus is located approximately west of I-5, which is an eligible state scenic highway (Caltrans 2018). The designated segment of SR 163 lies lower than adjacent vegetated slopes that define the character of the state scenic highway. While traveling southbound on this segment of SR 163, some upper portions of downtown buildings are visible above these hillsides and associated trees; however, expansive views of the skyline are not available and the dominant views are of natural lands adjacent to the highway and occasional overpasses. Views available towards the City College campus from the portion of SR 163 that is designated as a scenic highway are mostly obstructed due to distance and intervening development associated with the downtown area and the I-5 overpasses where SR 163 terminates. As such, development on the City College campus under the FMP would not impede the existing views of Balboa Park along this portion of SR 163 which contribute to its scenic highway designation.

Should the portion of I-5 adjacent to the northern and eastern edges of campus become officially designated, future development under the FMP could be visible from a designated state scenic highway. However, as discussed under Section 3.1.4.1 above, although some new or renovated buildings may alter views of the campus, the structures which would be constructed in accordance with the FMP would not be of a height that is greater than the existing development on campus such that existing views would be blocked or the intensity of development would substantially increase over existing conditions. Other downtown development to the south and west of the project site would continue to have greater height and density, thereby impeding the potential for unobstructed views of San Diego Bay from I-5 with or without future campus development. Development proposed under the FMP would

occur within the existing developed campus and would not remove or alter natural scenic features such as prominent rock formations or mature tree stands that contribute to a potentially eligible scenic highway setting. While some trees would be removed or replaced as part of projects implemented under the FMP, these changes would occur in an already developed environment and would not affect resources that contribute to the eligibility of I-5 as a designated state scenic highway. Refer to Section 3.4, *Cultural Resources*, for discussion of impacts to historic buildings on campus, which are not visible from a designated or eligible state scenic highway due to intervening development surrounding their central locations on campus. Therefore, implementation of the FMP would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Project-Level

The near-term projects are proposed within the City College campus and would not be visible from the portion of SR 163 that is designated scenic highway as discussed in the program-level analysis above. In addition, the near-term projects would not remove or alter natural scenic features such as prominent rock formations or mature tree stands that contribute to a scenic highway setting. While some trees would be removed or replaced as part of the near-term projects, these changes would occur in an already developed environment and would not affect resources visible from a designated state scenic highway. Refer to Section 3.4, *Cultural Resources*, for further discussion of impacts to historic buildings on campus; however, the two buildings contributing to the City College Campus Expansion Historic District (Building D and Saville Theatre) occur outside of the viewshed of a designated or eligible state scenic highway. Therefore, implementation of the near-term projects would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.1.4.3 Conflict with Scenic Quality Regulations

Threshold 3: In nonurbanized areas, would the project 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?

Impact Discussion

Program-Level

The City College campus is located in a developed area that meets the criteria of an "urbanized area" as defined in Public Resources Code (PRC) Section 21071, which defines the term "urbanized area" for the purposes of CEQA to mean an incorporated city that has a population of at least 100,000 persons or has a population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. According to data from the

U.S. Census Bureau, the population of the City in 2024 was 1,404,452 people (U.S. Census Bureau 2024). Thus, under CEQA, the project site would be considered within an urbanized area as defined by PRC Section 21071, with an applicable threshold for evaluation of visual character and quality impacts based on consistency with applicable zoning and other regulations governing scenic quality. As discussed above, the City's zoning and land use regulations related to scenic quality would not apply to District development on campus; therefore, this analysis still considers the visual character of the campus surroundings as the District aims to provide development that is compatible with surrounding land uses.

The City's zoning and land use regulations related to scenic quality would not apply to District owned properties such as City College; however, as described in Section 3.1.4.1, there would be no conflict with the Downtown Community Plan policy encouraging City College to maintain view corridors through the downtown area. Instead, the District relies on the comprehensive design standards and sustainability frameworks within the Design Guidelines and Standards Manual to guide development on the City College campus, which includes, but is not limited to, guidelines for building materials, color palettes, and specifications for lighting fixtures. During the design phase of projects implemented under the FMP, the contractor would be required to submit project mock-ups for approval by the District Architect which include the specific project's design intent, colors, textures, and craftsmanship. As such, future campus development projects would be constructed with high aesthetic quality and would be designed to be cohesive with surrounding campus development.

The campus is in a developed portion of the downtown community and is surrounded by multi-family residences, commercial development, and major transportation corridors. Existing public views of the site are defined by a mix of low to mid-rise academic buildings, parking structures, and other institutional facilities that establish an urban visual character. The projects implemented under the FMP would include modernization, replacement, and infill development within the existing City College campus which would result in visual changes. However, the height, scale, and visual quality of the projects implemented under the FMP would generally remain consistent with the height, scale, and visual quality of the existing campus built environment, which is compatible with existing and allowable surrounding commercial and residential development. Future projects would comply with the aesthetic requirements for on-campus structures outlined in the Design Guidelines and Standards Manual and would be designed to complement existing campus buildings in exterior finishes. Therefore, implementation of the FMP would not conflict with applicable zoning and other regulations governing scenic quality.

Project-Level

As outlined in the program-level analysis above, under CEQA, the City College campus, including the near-term project sites, would be within an urbanized area as defined by PRC Section 21071, with an applicable threshold for evaluation of visual character and quality impacts based on consistency with applicable zoning and other regulations governing scenic quality. The height, scale, and visual quality of each of the near-term projects would generally remain consistent with the height, scale, and visual quality of the existing campus built environment. The Building A Expansion project and Performing Arts Center project would each replace existing structures with expanded and upgraded buildings that would remain generally consistent with the scale and height of surrounding structures. The design of each new building may be in a more modern style but would take into account the surrounding campus buildings and provide complementary building finishes. The North Campus Athletic Fields project would include the addition of sand volleyball facilities and renovation of the existing fields, an expanded field house near the soccer fields, and a new field house near the softball field. This development would be

consistent with the existing character and scale of athletics-related development on North Campus under existing conditions. Further, each of the near-term projects would be required to comply with the aesthetic requirements outlined in the Design Guidelines and Standards Manual and summarized above. During the design phase of each of the near-term projects, the contractor would be required to submit project mock-ups for approval by the District Architect which include the specific project's design intent, colors, textures, and craftsmanship. Therefore, implementation of the near-term projects would not conflict with applicable zoning and other regulations governing scenic quality.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with applicable zoning and other regulations governing scenic quality. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.1.4.4 Light and Glare

Threshold 4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Discussion

Program-Level

During implementation of the FMP, nighttime construction could occasionally be required in specific circumstances, such as to accommodate concrete pours during lower temperature hours or to reduce temporary conflicts with traffic or operation of nearby uses. Although nighttime construction would require additional sources of lighting to be present, nighttime construction work would be limited to a few nights of work for those activities needing to occur during nighttime hours for an individual project. As this introduction of lighting during nighttime construction would be temporary and short-term, construction of projects implemented under the FMP would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Future development under the FMP would continue the installation and use of the types of lighting sources that occur on campus under existing conditions, including interior and exterior lighting for new buildings, new parking lot and security lighting, and new lighting for exterior athletic facilities. Existing streetlights and vehicle lights are also present along the roadways that intersect or are adjacent to the project site. Future projects would be required to comply with the aesthetic requirements outlined in the Design Guidelines and Standards Manual, which includes specifications for lighting fixtures and requires a review classroom lighting to minimize glare. These specifications, as well as goals in the Sustainability Levels framework to maximize daylight penetration, focus on providing a well-lit interior building environment without excessive glare but do not address the potential effects of exterior lighting on surrounding on- or off-campus uses. All projects proposed under the FMP would be reviewed by the District Architect during the design phase, which would include a review of the project's lighting components and project materials for consistency with the Design Guidelines and Standards Manual. However, even with implementation of these District design policies, there is the potential for sources of light and glare generated by the projects implemented under the FMP to result in light spillover or create new sources of glare that affect adjacent land uses.

Project-Level

For the North Campus Athletic Fields project, lighting would be included on the new sand volleyball courts, in addition to lighting on the existing softball field and the existing soccer field. The light poles would be a maximum height of 80 feet and would cast 50-footcandle levels. In addition, the Building A Expansion project and Performing Arts Center project would require the installation of standard building and security lighting along the outside of the proposed buildings. The lighting for each of the near-term projects would be designed and constructed in accordance with the requirements outlined in the District Design Guidelines and Standards Manual. However, even with implementation of these District design policies, without additional design considerations, there is the potential for sources of light and glare generated by the near-term projects to result in adverse light and glare effects on adjacent land uses.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, could create a new source of substantial light or glare which would adversely affect day or nighttime views in the area during operation. **Program-level and project-level impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

AES-1 **Exterior Lighting**. Prior to project approval, architectural plans, including detailed lighting plans and fixture specifications, shall be submitted for review and approval by the District Architect. The lighting plans must demonstrate the following to the satisfaction of the District Architect:

- Outdoor lighting fixtures shall be directed or shielded such that light does not fall onto surrounding properties or create glare hazards within public rights-of-way.
- All outdoor lighting shall be turned off between 11:00 p.m. and 6:00 a.m. except:
    - Outdoor lighting used for security purposes or to illuminate walkways, roadways, and parking lots; and
    - Outdoor lighting used to illuminate recreational activities shall be equipped with automatic timing devices, used while recreational events are in progress, and shielded to minimize light pollution.

AES-2 **Glare Reduction.** Prior to project approval, a project mock-up and materials board shall be submitted for review and approval by the District Architect. The primary building materials shall minimize glare and include non-reflective or matte surfaces for building facades. Windows or other glass treatments shall be glazed, insulated, or otherwise architecturally treated to minimize sunlight reflection to off-site properties and public rights-of-way. Projects that include development or alteration of parking areas shall be designed to shield direct glare from vehicle headlights from residential or other light-sensitive uses through the physical project design or through shielding mechanisms such as landscaping or physical barriers.

Project-Level

Mitigation measures AES-1 and AES-2 would apply to each of the near-term projects.

Level of Significance After Mitigation

Implementation of mitigation measures AES-1 and AES-2 would reduce program and project-level impacts related to the creation of light or glare to a level that is **less than significant**.

3.1.5 Cumulative Impact Analysis

The geographic scope for the aesthetics cumulative impact analysis includes the City College campus and the surrounding Downtown Community Plan area.

3.1.5.1 Scenic Vistas

Cumulative development projects proposed in the downtown community could result in significant cumulative impacts to scenic vistas. The Environmental Impact Report (EIR) prepared for the Downtown Community Plan (City 2006b) concluded that buildout of the East Village sub-district would have a significant and unavoidable impact on views of San Diego Bay and the San Diego Coronado Bay Bridge due to increased building heights. However, as discussed in Section 3.1.4.1 above, the FMP, including the near-term projects, would not have a significant impact related to scenic vistas as development would not occur between existing public view points and these scenic resources because existing high-rise development blocks such views under existing conditions. In addition, the views of Coronado Bridge and the San Diego Bay that are currently available from taller development and at intersections between existing mid and high-rise development would continue to be available. In addition, future development would occur within the boundaries of the City College campus, would not substantially increase building height beyond that of existing buildings on the campus. Therefore, the project **would not have a cumulatively considerable contribution** to the significant cumulative impact related to scenic vistas.

3.1.5.2 Scenic Resources

The EIR prepared for the Downtown Community Plan concluded that as there are no designated scenic resources within the downtown planning area, the Downtown Community Plan would not significantly impact scenic resources. As discussed under Section 3.1.4.2, implementation of the FMP would have less than significant impacts related to scenic resources within a scenic highway as projects are proposed within the City College campus boundary, which would not be visible from a designated scenic highway (SR 163) due to intervening development and distance. Although future projects implemented under the FMP could be visible from a scenic highway should I-5 become officially designated, development on campus would not be of a height that is greater than the existing development in the surrounding area and would not remove or alter natural scenic features such as prominent rock formations or mature tree stands that contribute to a scenic highway setting. Therefore, cumulative impacts related to scenic resources would be **less than significant**.

3.1.5.3 Conflict with Scenic Quality Regulations

The scenic quality of the surrounding communities is currently regulated by the City of San Diego General Plan and Downtown Community Plan along with their implementing development regulations.

Although cumulative development projects would be required to comply with local policies related to scenic quality, deviations could be permitted by the City. Therefore, cumulative development in the Downtown Community Plan area could result in significant cumulative impacts to scenic quality. However, the FMP, including the near-term projects, would not have a significant impact related to conflicts with scenic quality regulations, as discussed in Section 3.1.4.3 above. The FMP does not propose a densification of the campus that would substantially increase building heights and contribute to the overall change in visual character of the Downtown Community Plan area. The projects proposed under the FMP would occur within the boundaries of the City College campus and individual projects would be required to comply with the aesthetic guidelines adopted by the District. Therefore, the contribution of the FMP to cumulative scenic quality impacts **would not be cumulatively considerable**.

3.1.5.4 Light and Glare

Cumulative impacts related to light and glare could occur if future projects proposed in an area would add individual light sources or reflective surfaces that together combine to adversely affect daytime or nighttime views. Development projects within the Downtown Community Plan area would be required to comply with San Diego Municipal Code policies related to the reduction of light and glare, which require shielding of light from neighboring properties and most lighting types to be turned off between 11:00 p.m. and 6:00 a.m. As such, through regulatory and policy compliance, development proposed in the Downtown Community Plan area would not create substantial light or glare. As discussed in Section 3.1.4.4 above, projects implemented under the FMP would also result in less than significant impacts related to light and glare with implementation of mitigation measures AES-1 and AES-2. Therefore, cumulative impacts related to light and glare would be **less than significant**.

3.2 Air Quality

This section addresses the potential air quality impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to air quality are also addressed. This section relies on the information and analysis in the Air Quality and Greenhouse Gas Emissions Technical Report (HELIX Environmental Planning, Inc. [HELIX] 2026), provided as Appendix B to the PEIR.

3.2.1 Environmental Setting

The project site is located within the San Diego Air Basin (SDAB) which is comprised of all of the County of San Diego (County). Air quality in the SDAB is regulated by the U.S. Environmental Protection Agency (USEPA) at the federal level, by the California Air Resources Board (CARB) at the state level, and by the San Diego County Air Pollution Control District (SDAPCD) at the regional level.

3.2.1.1 Air Pollutants of Concern

Criteria Pollutants

Criteria pollutants are defined by state and federal law as a risk to the health and welfare of the public. In general, criteria air pollutants include the following compounds:

- Ozone
- Carbon monoxide (CO)
- Nitrogen dioxide (NO_2)
- Particulate matter (PM), which is further subdivided:
  - Coarse PM, 10 microns or less in diameter (PM_{10})
  - Fine PM, 2.5 microns or less in diameter ($PM_{2.5}$)
- Sulfur dioxide (SO_2)
- Lead

Criteria pollutants can be emitted directly from sources (primary pollutants; e.g., CO, SO_2, PM_{10}, $PM_{2.5}$, and lead), or they may be formed through chemical and photochemical reactions of precursor pollutants in the atmosphere (secondary pollutants; e.g., ozone, NO_2, PM_{10}, and $PM_{2.5}$). PM_{10} and $PM_{2.5}$ can be both primary and secondary pollutants. The principal precursor pollutants of concern are reactive organic gases ([ROGs] also known as volatile organic compounds [VOCs])[1] and nitrogen oxides (NO_X), which react to form ozone.

Descriptions of sources and general health effects for each of the criteria air pollutants are shown in Table 3.2-1, *Common Sources and Human Health Effects of Criteria Air Pollutants*. Specific adverse health effects on individuals or population groups induced by criteria pollutant emissions are highly dependent on a multitude of interconnected variables such as cumulative concentrations, local meteorology and atmospheric conditions, and the number and characteristics of exposed individuals

[1] CARB defines and uses the term ROGs while the USEPA defines and uses the term VOCs. The compounds included in the lists of ROGs and VOCs and the methods of calculation are slightly different. However, for the purposes of estimating criteria pollutant precursor emissions, the two terms are often used interchangeably.

(e.g., age, gender). Criteria pollutant precursors (ROG and NO_X) affect air quality on a regional scale, typically after a significant delay and distance from the pollutant source emissions. Health effects related to ozone and NO_2 are, therefore, the product of emissions generated by numerous sources throughout a region.

Emissions of criteria pollutants from vehicles traveling to or from the project site (mobile emissions) are distributed nonuniformly in location and time throughout the region, wherever the vehicles may travel. As such, specific health effects from these criteria pollutant emissions cannot be meaningfully correlated to the incremental contribution from the project.

Table 3.2-1
COMMON SOURCES AND HUMAN HEALTH EFFECTS OF CRITERIA AIR POLLUTANTS

Pollutant	Major Human-Made Sources	Human Health Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuel is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO_2)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to climate change and nutrient overloading, which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O_3)	Formed by a chemical reaction between reactive organic gases (ROGs) and nitrogen oxides (NO_X) in the presence of sunlight. Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM_{10} and $PM_{2.5}$)	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and other sources.	Increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO_2)	A colorless, nonflammable gas formed when fuel containing sulfur is burned, when gasoline is extracted from oil, or when metal is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant. Aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid, which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.
Lead	Metallic element emitted from metal refineries, smelters, battery manufacturers, iron and steel producers, use of leaded fuels by racing and aircraft industries.	Anemia, high blood pressure, brain and kidney damage, neurological disorders, cancer, lowered IQ. Affects animals, plants, and aquatic ecosystems.

Source: CARB 2026a; USEPA 2026

Toxic Air Contaminants

California Health and Safety Code Section 39655(a) defines a toxic air contaminant (TAC) as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (CAA) (42 U.S. Code Section 7412[b]) is a TAC. Under state law, the California Environmental Protection Agency (CalEPA), acting through CARB, is authorized to identify a substance as a TAC if it determines the substance is an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is referred to as diesel particulate matter (DPM). Almost all DPM is 10 microns or less in diameter, and 90 percent of DPM is less than 2.5 microns in diameter (CARB 2026b). Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung. In 1998, CARB identified DPM as a TAC based on published evidence of a relationship between diesel exhaust exposure and lung cancer and other adverse health effects. DPM has a notable effect on California's population; it is estimated that about 70 percent of total known cancer risk related to air toxins in California is attributable to DPM (CARB 2026b).

3.2.1.2 Climate and Meteorology

The climate in southern California, including the SDAB, is controlled largely by the large-scale meteorological condition that dominates the west coast of the U.S.: a seasonally semi-permanent high-pressure cell centered over the northeastern Pacific Ocean, called the Pacific high, which keeps most storms from affecting the California coast. Areas within 30 miles of the coast in the San Diego region, including the project site, experience moderate temperatures and comfortable humidity.

Due to its climate, the SDAB experiences frequent temperature inversions (temperature increases as altitude increases, which is the opposite of general patterns). Temperature inversions prevent air close to the ground from mixing with the air above it. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere, creating a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light, daytime winds, predominantly from the west, further aggravate the condition by driving the air pollutants inland, toward the foothills. During the fall and winter, air quality problems are created due to CO and NO_2 emissions. High NO_2 levels usually occur during autumn or winter, on days with summer-like conditions.

The predominant wind direction in the vicinity of the project site is from the northwest and the average wind speed is approximately 6.5 miles per hour (mph; Iowa Environmental Mesonet 2025). The annual average maximum temperature in the project area is approximately 69.6 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56.4°F. Total precipitation in the project area averages 9.84 inches annually (Iowa Environmental Mesonet 2026).

3.2.1.3 Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65 years of age,

children under 14 years of age, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis (CARB 2005; OEHHA 2015). Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers.

The closest existing sensitive receptors to the project site are the single- and multi-family residences to the south of South Campus, separated from campus by C Street. Additional sensitive receptors include hotels located southwest of South Campus across Park Boulevard, south of South Campus across Russ Boulevard, and west of North Campus across 11th Avenue. Within the project site, the Early Childhood Education Center, high schools, and future Affordable Student Housing are considered sensitive receptors.

3.2.1.4 Existing Regional Air Quality

Attainment Designations

Attainment designations are discussed further in Section 3.2.2.2 below. In short, regions are designated as being in attainment or nonattainment for each criteria air pollutant based on whether they achieve the relevant federal or state air quality standards. The SDAB is classified as a nonattainment area under the National Ambient Air Quality Standards (NAAQS) for ozone (8-hour) and as a nonattainment area under the California Ambient Air Quality Standards (CAAQS) for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5}$. The SDAB is an attainment area for all other criteria pollutants.

Monitored Air Quality

The SDAPCD operates a network of ambient air monitoring stations throughout the San Diego region. The purpose of the monitoring stations is to measure ambient concentrations of criteria air pollutants and determine whether the ambient air quality meets state and federal standards. The nearest ambient monitoring station to the project site is the Sherman Elementary School monitoring station located approximately 0.5 mile southeast of the project site. Data at this monitoring site are collected for ozone, $PM_{2.5}$, and NO_2. Air quality monitoring data for CO and PM_{10} were obtained from the SDAPCD Annual Air Quality Monitoring Network Plan (SDAPCD 2025a) and represent countywide concentrations. Air quality data for the years 2022 through 2024 are shown in Table 3.2-2, *Air Quality Monitoring Data*.

Table 3.2-2
AIR QUALITY MONITORING DATA

Pollutant Standard	2022	2023	2024
Ozone (O_3) – Sherman Elementary School			
Maximum concentration 1-hour period (ppm)	0.087	0.081	0.083
Maximum concentration 8-hour period (ppm)	0.063	0.070	0.067
Days above 1-hour state standard (>0.09 ppm)	0	0	0
Days above 8-hour state/federal standard (>0.070 ppm)	0	0	0
Carbon Monoxide (CO) – Countywide			
Maximum 8-hour concentration (ppm)	1.2	2.1	2.8
Days above federal standard (>9.0 ppm)	0	0	0

Pollutant Standard	2022	2023	2024
Respirable Particulate Matter (PM_{10}) – Countywide			
Maximum 24-hour concentration (µg/m^3)	243	175	152
Days above federal standard (>150 µg/m^3)	3	1	0[1]
Fine Particulate Matter ($PM_{2.5}$) – Sherman Elementary School			
Maximum 24-hour concentration (µg/m^3)	18.9	27.8	37.0
Measured Days above 24-hour federal standard (>35 µg/m^3)	0	0	1
Annual average (µg/m^3)	8.8	8.9	9.6
Exceed federal annual standard (>9.0 µg/m^3)	No	No	Yes
Exceed state annual standard (>12 µg/m^3)	No	No	No
Nitrogen Dioxide (NO_2) – Sherman Elementary School			
Maximum 1-hour concentration (ppm)	0.054	0.054	0.049
Days above state 1-hour standard (>0.18 ppm)	0	0	0
Days above federal 1-hour standard (>0.100 ppm)	0	0	0
Annual average (ppm)	0.010	0.009	0.010
Exceed annual federal standard (>0.053 ppm)	No	No	No
Exceed annual state standard (>0.030 ppm)	No	No	No

Source: CARB 2025; SDAPCD 2025a

[1] While the reported maximum 24-hour concentration exceeds 150 µg/m^3, SDACPD reports no daily exceedance for 2024.

ppb = parts per billion; ppm = parts per million; µg/m^3 = micrograms per cubic meter

As shown in Table 3.2-2, monitoring data at the Sherman Elementary School station reported no exceedances of the 1-hour state ozone standard or the 8-hour state or federal ozone standard from 2022 to 2024. The Sherman Elementary School station reported that the federal and state standard for $PM_{2.5}$ was not exceeded in 2022 or 2023 but was exceeded once in 2024. No exceedances of the state or federal standards for NO_2 occurred at the Sherman Elementary School monitoring station from 2022 to 2024 (CARB 2025). Countywide data shows exceedances of the 24-hour PM_{10} standard in 2022 and 2023 and no exceedances of the CO standards for the sample period (SDAPCD 2025a).

Existing Campus Air Quality

Emissions associated with the existing development on the project site were estimated using the California Emissions Estimator Model (CalEEMod) and associated adjustment factors published by CARB as further described in Section 3.2.4.2. Existing emissions at the project site occur in association with the on-site uses, specifically mobile source emissions from vehicle trips to and from the campus; area source emissions generated by maintenance equipment, landscape equipment, and use of products that contain solvents; and energy source emissions from natural gas usage. Table 3.2-3, *Existing Daily Operational Emissions,* shows the model-calculated pollutant emissions associated with the existing uses at the project site modeled for the FMP buildout year (2045). While the baseline year considered in this PEIR is 2025, the 2045 model year used in these calculations provides emissions that can be compared with project-related emissions at buildout to demonstrate what would occur if the FMP were not implemented and existing campus facilities continued operations in the year 2045 without changes. CalEEMod output files for the existing condition are included in Appendix A, *Existing Campus CalEEMod Output*, of Appendix B to the PEIR.

Table 3.2-3
EXISTING DAILY OPERATIONAL EMISSIONS

Category	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Mobile	16.7	10.3	124.0	0.4	40.1	10.3
Area	31.2	--	58.3	<0.1	0.1	0.1
Energy	0.3	4.8	4.0	<0.1	0.4	0.4
Total Maximum Daily Emissions	**48.2**	**15.1**	**186.3**	**0.4**	**40.6**	**10.7**

Source: HELIX 2026
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

3.2.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to air quality is provided below.

3.2.2.1 Federal

Federal Clean Air Act

Air quality is defined by ambient air concentrations of specific pollutants identified by the USEPA to be of concern with respect to health and welfare of the general public. The USEPA is responsible for enforcing the federal CAA of 1970 and its 1977 and 1990 Amendments. The federal CAA required the USEPA to establish NAAQS, which identify concentrations of pollutants in the ambient air below which no adverse effects on the public health and welfare are anticipated. In response, the USEPA established both primary and secondary standards for designated criteria pollutants. Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and the public welfare from air pollutants in the atmosphere. Table 3.2-4, *Ambient Air Quality Standards*, shows the federal and state ambient air quality standards for these pollutants.

Table 3.2-4
AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	–
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	Same as Primary
PM_{10}	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	AAM	20 µg/m^3	–	Same as Primary
$PM_{2.5}$	24 Hour	–	35 µg/m^3	Same as Primary
	AAM	12 µg/m^3	9.0 µg/m^3 [(3)]	15.0 µg/m^3
CO	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	–
	8 Hour	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	–
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)	–	–
NO_2	1 Hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	–
	AAM	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary

Pollutant	Averaging Time	California Standards	Federal Standards Primary[1]	Federal Standards Secondary[2]
SO_2	1 Hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	–
	3 Hour	–	–	0.5 ppm (1,300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	–	–
Lead	30-day Avg.	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary
	Rolling 3-month Avg.	–	0.15 µg/m^3	Same as Primary
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per km – visibility ≥ 10 miles (0.07 per km – ≥30 miles for Lake Tahoe)	No Federal Standards	No Federal Standards
Sulfates	24 Hour	25 µg/m^3	No Federal Standards	No Federal Standards
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	No Federal Standards	No Federal Standards
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)	No Federal Standards	No Federal Standards

Source: CARB 2024; USEPA 2025

[1] National Primary Standards: The levels of air quality necessary, within an adequate margin of safety, to protect public health.

[2] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[3] On February 7, 2024, the USEPA announced a final rule to lower the annual arithmetic mean (AAM) primary NAAQS for $PM_{2.5}$ from 12.0 µg/m^3 to 9.0 µg/m^3. The CAAQS has not been lowered; therefore, the more stringent NAAQS applies.

O_3 = ozone; ppm = parts per million; µg/m^3 = micrograms per cubic meter; PM_{10} = particulate matter with a diameter of 10 microns or less; AAM = Annual Arithmetic Mean; $PM_{2.5}$ = fine particulate matter; CO = carbon monoxide; mg/m^3 = milligrams per cubic meter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide; km = kilometer; – = No Standard

The USEPA has classified air basins (or portions thereof) as being in "attainment," "nonattainment," "maintenance," or "unclassified" for each criteria air pollutant, based on whether the NAAQS have been achieved. Upon attainment of a standard for which an area was previously designated nonattainment, the area is classified as a maintenance area. If an area is designated unclassified, it is because inadequate air quality data were available as a basis for a nonattainment or attainment designation. The project site is located within the SDAB and, as such, is in an area designated as a Severe-15 nonattainment area for the 8-hour NAAQS for ozone (USEPA 2025). The SDAB is an attainment area or unclassifiable for the NAAQS for all other criteria pollutants (SDAPCD 2026). Table 3.2-5, *San Diego Air Basin Attainment Status*, lists the federal and state attainment status of the SDAB for the criteria pollutants.

Table 3.2-5
SAN DIEGO AIR BASIN ATTAINMENT STATUS

Criteria Pollutant	Federal Designation	State Designation
Ozone (1-hour)	Attainment[1]	Nonattainment
Ozone (8-hour)	Nonattainment	Nonattainment
CO	Attainment	Attainment
PM_{10}	Unclassifiable[2]	Nonattainment
$PM_{2.5}$	Attainment	Nonattainment[3]
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	(No federal standard)	Attainment
Hydrogen Sulfide	(No federal standard)	Unclassified
Visibility	(No federal standard)	Unclassified

Source: SDAPCD 2026; USEPA 2025

[1] The federal 1-hour standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] At the time of designation, if the available data does not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

[3] CARB has not reclassified the region to attainment yet due to (1) incomplete data, and (2) the use of non-California Approved Samplers. While data collected does meet the requirements for designation of attainment with federal $PM_{2.5}$ standards, the data completeness requirements for state $PM_{2.5}$ standards substantially exceed federal requirements and mandates, and have historically not been feasible for most air districts to adhere to given local resources. SDAPCD has begun replacing most regional filter-based $PM_{2.5}$ monitors as they reach the end of their useful life with continuous $PM_{2.5}$ air monitors to ensure collected data meets stringent completeness requirements in the future. SDAPCD anticipates these new monitors will be approved as "California Approved Samplers" monitors once CARB reviews the list of approved monitors, which has not been updated since 2013.

CO = carbon monoxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; NO_2 = nitrogen dioxide; SO_2 = sulfur dioxide

3.2.2.2 State

California Clean Air Act

The federal CAA allows states to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards. CARB has established the more stringent CAAQS for the six criteria pollutants through the California CAA of 1988 and has established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles (refer to Table 3.2-4). Similar to the NAAQS, areas that do not meet the CAAQS for a particular pollutant are designated “nonattainment” areas for that pollutant. As shown in Table 3.2-5, the SDAB is currently classified as a nonattainment area under the CAAQS for ozone (8-hour and 1-hour), PM_{10}, and $PM_{2.5}$. The SDAB is an attainment area for the CAAQS for all other criteria pollutants (SDAPCD 2026).

State Implementation Plan

The federal CAA requires areas with unhealthy levels of criteria pollutants to develop plans, known as State Implementation Plans (SIPs). SIPs are comprehensive plans that describe how an area will attain the NAAQS. The 1990 amendments to the federal CAA set deadlines for attainment based on the severity of an area’s air pollution problem. SIPs are not single documents – they are a compilation of

new and previously submitted plans, programs (e.g., monitoring, modeling, permitting), district rules, state regulations, and federal controls. Many of California's SIPs rely on a core set of control strategies, including emission standards for cars and heavy trucks, fuel regulations, and limits on emissions from consumer products. State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB forwards the SIP revisions to the USEPA for approval and publication in the Federal Register. The Code of Federal Regulations Title 40, Chapter I, Part 52, Subpart F, Section 52.220 lists all of the items that are included in the California SIP (CARB 2026c). At any one time, several California submittals are pending USEPA approval.

Mobile sources are regulated by the USEPA and CARB, and the emissions reduction strategies related to mobile sources are considered in the local air quality plans. Public Laws 119-15, 119-16, and 119-17 were enacted by U.S. Congress in May 2025 and were signed into law in June 2025, which nullified various USEPA rules regarding California advanced clean car and truck emissions standards. Specifically, these Public Laws disapproved preemption waivers previously approved by the USEPA for the Advanced Clean Cars, California's Advanced Clean Trucks, Zero-Emission Airport Shuttle, and Omnibus Low NO_x regulations. Accordingly, these regulations are preempted by the federal CAA, meaning that California can no longer enforce or attempt to enforce the regulations and that estimated emissions reductions attributed to the regulations cannot be used for development of the California SIP or conformity determinations.

3.2.2.3 Regional

Attainment Plan and Regional Air Quality Strategy

The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The current regional air quality plan for attainment of the NAAQS in the County is SDAPCD's *2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County* (Attainment Plan; SDAPCD 2020). The Attainment Plan, which would be a revision to the SIP, outlines SDAPCD's plans and control measures designed to attain the NAAQS for ozone. The current regional air quality plan for attainment of the CAAQS is SDAPCD's *2022 Revision to the Regional Air Quality Strategy for San Diego County* (RAQS; SDAPCD 2023). The RAQS was initially adopted in 1992 and identifies measures to reduce emissions from sources regulated by the SDAPCD, primarily stationary sources such as industrial operations and manufacturing facilities. The RAQS is periodically updated to reflect updated information on air quality, emission trends, and new feasible control measures (SDAPCD 2023). These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on stationary sources to attain the NAAQS and CAAQS.

The Attainment Plan and RAQS rely on information from CARB and SANDAG, including mobile and area source emissions, as well as information regarding projected growth in the County, to project future emissions and then determine from that the strategies necessary for the reduction of emissions through regulatory controls. CARB mobile source emission projections and SANDAG growth projections are based on population and vehicle trends and land use plans developed by the cities and by the County.

San Diego County Air Pollution Control District Rules and Regulations

SDAPCD adopts rules to regulate pollutant emissions from various sources in the County. The rules also establish procedures for SDAPCD permitting, fees, and hearings. The SDAPCD rules most relevant to the project are described below.

Rule 50 (Visible Emissions)

Particulate matter pollution impacts the environment by decreasing visibility (haze). These particles vary greatly in shape, size, and chemical composition, and come from a variety of natural and manmade sources. Some haze-causing particles are directly emitted to the air such as windblown dust and soot. Others are formed in the air from the chemical transformation of gaseous pollutants (e.g., sulfates, nitrates, organic carbon particles) which are the major constituents of $PM_{2.5}$. These fine particles, caused largely by combustion of fuel, can travel hundreds of miles causing visibility impairment.

Visibility reduction is probably the most apparent symptom of air pollution. Visibility degradation is caused by the absorption and scattering of light by particles and gases in the atmosphere before it reaches the observer. As the number of fine particles increases, more light is absorbed and scattered, resulting in less clarity, color, and visual range. Light absorption by gases and particles is sometimes the cause of discolorations in the atmosphere but usually does not contribute very significantly to visibility degradation. Scattering by particulates impairs visibility much more readily. SDAPCD Rule 50 (Visible Emissions) sets emission limits based on the apparent density or opacity of the emissions using the Ringelmann scale (SDAPCD 1997).

Rule 51 (Nuisance)

SDAPCD Rule 51 (Nuisance) states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause or have a natural tendency to cause injury or damage to business or property. The provisions of the rule do not apply to odors emanating from agricultural operations in the growing of crops or raising of fowls or animals (SDAPCD 1976).

Rule 55 (Fugitive Dust Control)

SDAPCD Rule 55 (Fugitive Dust Control) requires action be taken to limit dust from construction and demolition activities from leaving the property line. Similar to Rule 50 (Visible Emissions), Rule 55 (Fugitive Dust Control) places limits on the amount of visible dust emissions in the atmosphere beyond the property line. It further stipulates that visible dust on roadways as a result of track-out/carry-out shall be minimized through implementation of control measures and removed at the conclusion of each workday using street sweepers (SDAPCD 2009).

Rule 67.0.1 (Architectural Coatings)

Effective January 1, 2022, SDAPCD Rule 67.0.1 (Architectural Coatings) establishes standards for the VOC content of architectural coatings by coating category. It requires general flat and non-flat coatings (e.g., paint) to have 50 grams per liter (g/L) or less VOC content and traffic marking coatings to have 100 g/L or less VOC content (SDAPCD 2021).

Rule 1200 (Toxic Air Contaminants - New Source Review)

Effective February 13, 2025, SDAPCD Rule 1200 (Toxic Air Contaminants - New Source Review) establishes how SDAPCD evaluates and limits health risks from toxic air contaminants emitted by new, modified, or relocated stationary sources. It requires facilities seeking permits to conduct a health risk assessment and install Toxics Best Available Control Technology when necessary to ensure cancer and non-cancer risks stay below SDAPCD-defined thresholds (SDAPCD 2025b).

3.2.2.4 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and Sustainability Levels. Development of the District's Sustainability Plan included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. These goals, which each have respective Key Performance Indicators (KPIs), have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects and include the following related to air quality.

Materials Impact Goal 2. Provide healthy environment that does not abuse material resources and improves health. **KPI:** Maintain optimal CO_2 and VOC levels. Use materials that are low-carbon, recycled, or responsibly sourced.

Design Guides and Standards

Section 2.1 of the District Design Guidelines and Standards Manual outlines general procedures and standards for new construction and building modifications on District campuses. This section specifies that interior finishes on all renovations or new construction on District properties much use composite wood products which meet CARB Phase 2 requirements, and that all adhesives, sealants, paints, and coatings must meet or exceed South Coast Air Quality Management District (SCAQMD) Rule 1113 VOC content limits. The SCAQMD Rule 1113 limits for building envelope coating (50 g/L) and traffic coatings (100 g/L) are equivalent to the SDAPCD Rule 67.0.1 requirements for general flat and non-flat coatings and traffic marking coatings outlined in Section 3.2.2.3 above).

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. Related to air quality, the District standard is for all new equipment to be all-electric and not use natural gas for functions that can instead be served by electric equipment, such as building and water heating. Natural gas may be used in select instances where electric alternatives are not available or would not serve the intended purpose, subject to prior approval by the District Architect.

3.2.2.5 Local (Non-Regulatory)

While the District is not subject to local zoning regulations or land use planning documents, the campus is located adjacent to properties within the City of San Diego's (City's) jurisdiction and could involve construction work within City rights-of way (ROWs), which would be subject to the San Diego Municipal Code section below.

San Diego Municipal Code

The San Diego Municipal Code addresses the release of air contaminants in Section 142.0710 (Air Contaminant Regulations), which states:

> Air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling, shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

3.2.3 Thresholds of Significance

Thresholds used to evaluate potential air quality impacts are based on CEQA Guidelines Appendix G. A significant air quality impact could occur if implementation of the proposed project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; or
4. Result in emissions (such as those leading to odors) adversely affecting a substantial number of people.

Appendix G of the CEQA Guidelines states that the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the above determinations. Therefore, to determine whether a project would result in a cumulatively considerable net increase of PM_{10}, $PM_{2.5}$, or ozone precursors (NO_X and VOCs), project emissions can be evaluated in comparison with the quantitative emission thresholds established by the SDAPCD. As part of its air quality permitting process, the SDAPCD has established thresholds in Rules 20.2 and 20.3 for the preparation of Air Quality Impact Assessments. In the absence of SDAPCD adopted thresholds for VOCs, the City's screening threshold is used in this analysis (City 2022).

The screening criteria were developed by SDAPCD with the purpose of attaining the NAAQS and CAAQS. Therefore, for CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to regional air quality. The screening thresholds are included in Table 3.2-6, *Screening-Level Thresholds for Air Quality Impact Analysis*.

Table 3.2-6
SCREENING-LEVEL THRESHOLDS FOR AIR QUALITY IMPACT ANALYSIS

Pollutant	Emissions		
	Pounds per Hour	Pounds per Day	Tons per Year
Respirable Particulate Matter (PM_{10})	--	100	15
Fine Particulate Matter ($PM_{2.5}$)	--	67	10
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	--	3.2	0.6
Volatile Organic Compounds (VOC)	--	137	15

Source: SDAPCD 2019; City 2022

3.2.4 Impact Analysis

3.2.4.1 Air Quality Plans

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact Discussion

Program-Level

The SDAPCD is required, pursuant to the federal CAA, to reduce emissions of criteria pollutants for which the SDAB is in nonattainment. Strategies to achieve these emissions reductions are developed in the Attainment Plan, RAQS, and SIP, prepared by the SDAPCD for the region. The Attainment Plan, RAQS, and SIP are based on SANDAG population projections, as well as land use designations and population projections included in general plans for cities and the County. Regional population growth is typically associated with the construction of residential units or large employment centers.

Projects that propose development that is consistent with the growth anticipated by SANDAG would be consistent with the Attainment Plan and RAQS. If a project proposes development that is less intensive than anticipated within the applicable general plan or land use assumptions used by SANDAG to develop its projections, the project would likewise be consistent with the Attainment Plan and RAQS. If a project proposes development that is more emissions-intensive than that anticipated in the applicable general plan or growth projections upon which the Attainment Plan and RAQS are based, the project could conflict with the Attainment Plan and RAQS and may have a potentially significant impact on air quality. This situation would warrant further analysis to determine whether the project and the surrounding projects exceed the growth projections used in the Attainment Plan and RAQS for the specific subregional area.

The purpose of the proposed FMP is to implement campus wide improvements to modernize existing facilities, improve programming, and accommodate on-campus student enrollment growth anticipated through 2045 within the existing City College campus. The project would accommodate regional growth that is projected through 2045 (refer to Section 3.12, *Population and Housing*) and would include land uses that are generally consistent with the existing campus land use types. Therefore, the project would

not increase the regional population beyond SANDAG's growth forecasts. The RAQS and Attainment Plan rely on the same information from the SANDAG growth forecast to develop emission inventories and emission reduction strategies that are included in the attainment demonstration for the air basin. Because the project would not generate population growth beyond the levels assumed for the region, the project would not conflict with population growth projections for the region and would, therefore, be consistent with the RAQS and Attainment Plan. In addition, as detailed in Section 3.2.4.2, below, the project would not exceed daily screening level thresholds for emissions of ozone precursors or criteria air pollutants.

Project-Level

As individual components of the FMP described in the program-level analysis above, the near-term projects would be consistent with the existing campus land use types and would not generate population growth beyond the levels assumed for the region. As such, the near-term projects would not conflict with population projections for the region and would, therefore, be consistent with the RAQS and Attainment Plan. In addition, as detailed in Section 3.2.4.2, below, the near-term projects would not exceed daily screening level thresholds for emissions of ozone precursors or criteria air pollutants.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with or obstruct implementation of the applicable air quality plan. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.2.4.2 Air Quality Standards

Threshold 2: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Impact Discussion

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SDAB. As discussed in Section 3.2.1.4, the region is a federal and/or state nonattainment area for ozone, PM_{10}, and $PM_{2.5}$. Implementation of the FMP would generate criteria pollutants and ozone precursors sporadically during construction activities and on an ongoing basis during campus operation. To determine whether the project would result in a cumulatively considerable net increase in criteria pollutants that would violate an air quality standard or contribute substantially to an existing or projected air quality violation, the near-term project construction emissions and the FMP buildout operational emissions are evaluated in comparison with the quantitative screening thresholds discussed in Section 3.2.3 and shown in Table 3.2-6.

Criteria pollutant and precursor emissions were calculated using CalEEMod, Version 2022.1. CalEEMod is a computer model used to estimate emissions resulting from land development projects throughout California. CalEEMod was developed by the California Air Pollution Control Officers Association (CAPCOA) in collaboration with California air quality management and pollution control districts (CAPCOA 2022).

In brief, CalEEMod is a computer model that estimates criteria air pollutant and greenhouse gas (GHG) emissions from mobile (i.e., vehicular) sources, area sources (fireplaces, woodstoves, and landscape maintenance equipment), energy use (electricity and natural gas used in space heating, ventilation, and cooling; lighting; and plug-in appliances), water use and wastewater generation, solid waste disposal, and stationary sources. In various places, the user can input additional information and/or override the default assumptions to account for project- or location-specific parameters. For the assessment of air quality impacts, the inputs focus on mobile, area, and energy (natural gas). Default parameters were not changed unless otherwise noted in Section 4.1 of Appendix B to the PEIR.

Program-Level

Construction Emissions

Construction of the projects proposed under the FMP would be similar in scale and construction intensity, would require similar types of construction activity, and would utilize similar types of construction equipment to the near-term projects, the maximum daily emissions for which are presented in the project-level analysis below. Construction input data for emissions modeling using CalEEMod include, but are not limited to, (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; (3) areas to be excavated and graded; and (4) volumes of materials to be exported from and imported to the project site. The analysis assessed maximum daily emissions from individual construction activities associated with implementation of the near-term projects, which are each expected to include demolition, site preparation, grading, utility undergrounding, building construction, architectural coating, and paving, similar to future FMP projects. Construction would also occur in accordance with SDAPCD Rules 55 and 67.0.1, which would limit PM emissions from ground disturbance and VOC emissions from coating application; the modeled construction emissions assume compliance with these rules. The District anticipates that grading would be balanced on-site for future projects, and as such the model did not include import or export during construction.

The quantity, duration, and intensity of construction activity influence the amount of construction emissions and related pollutant concentrations that occur at any one time. As such, the emission forecasts prepared for the near-term projects reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction activity is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions from future project construction could be less than those forecasted in future years as a more modern and cleaner-burning construction equipment fleet mix than assumed in CalEEMod becomes available.

As shown in the project-level analysis below, even if the maximum day of emissions associated with each of the three near-term projects occurred on the same day, the screening thresholds would not be exceeded. Simultaneous construction of these three projects is a reasonably conservative scenario for the intensity of concurrent construction that may occur on campus during implementation of the FMP. The use of equipment for minor renovations or other maintenance projects would be less intensive than for the near-term or long-term redevelopment projects. As the criteria pollutant and precursor emissions associated with construction of each of the near-term projects would be below the applicable screening thresholds, even with concurrent construction, it can be assumed that future construction activities required for buildout of the FMP also would not exceed these screening thresholds.

Operational Emissions

The net increase in operational emissions associated with full buildout of the FMP (operational year 2045) over existing conditions (refer to Table 3.2-3) was estimated using CalEEMod. Model inputs for mobile sources were based on the projected 2045 City College on-campus enrollment of 8,856 students, resulting in an estimate of 10,184 average daily trips (ADT; Linscott, Law & Greenspan Engineers [LLG] 2026a). As new buildings would typically be all-electric, natural gas demand at buildout of the FMP was assumed to decrease proportionally with the demolition of existing buildings based on the rate of natural gas per square foot used from March 2024 to February 2025. Operational emissions calculations and model outputs are provided in Appendix C, *FMP Full Buildout CalEEMod Output*, of Appendix B to the PEIR. Table 3.2-7, *Net Daily Operational Emissions at Buildout*, presents a summary of the net increase in daily operational emissions for the project in comparison with the daily thresholds provided in Table 3.2-6.

Table 3.2-7
NET DAILY OPERATIONAL EMISSIONS AT BUILDOUT

Category	Pollutant Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Mobile	22.5	13.9	167.0	0.5	54.0	13.8
Area	39.8	--	78.0	<0.1	0.1	0.1
Energy	0.2	4.3	3.6	<0.1	0.3	0.3
Total Daily Emissions[1]	**62.5**	**18.2**	**250.3**	**0.5**	**54.5**	**14.2**
Existing Daily Emissions (Table 3.2-3)	48.2	15.1	186.3	0.4	40.6	10.7
Net Daily Emissions[1]	**14.3**	**3.1**	**64.0**	**0.1**	**13.9**	**3.5**
Screening Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026

[1] Totals and differences may not compute due to rounding.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3.2-7, the net increase in emissions of all criteria pollutants and ozone precursors associated with operation of the project would be below the daily screening thresholds.

Project-Level

Construction Emissions

The near-term project construction emissions were estimated using CalEEMod based on the proposed construction schedules for these projects. Emissions estimated for construction assume conformance with SDAPCD Rules 55 and 67.0.1, specifically watering exposed areas twice per day, limiting vehicle speeds on unpaved on-site roads, and limiting the VOC content of architectural coatings to 50 g/L for building coatings and 100 g/L for parking lot markings.

The results of the emissions calculations for construction of each of the near-term projects are shown in Table 3.2-8, *Maximum Daily Construction Emissions*. The data are presented as the maximum anticipated daily emissions for each of the near-term projects. As certain phases of construction would occur concurrently for the near-term projects and could similarly occur concurrently during future

construction, the combined maximum daily emissions are additionally presented and compared to the applicable screening thresholds as a conservative construction scenario. The complete CalEEMod outputs are provided in Appendix B, *Near-Term Construction CalEEMod Output*, of Appendix B to the PEIR.

Table 3.2-8
MAXIMUM DAILY CONSTRUCTION EMISSIONS

Year	Pollutant Emissions (pounds per day)					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Building A Expansion						
2027	2.3	21.4	19.7	<0.1	2.1	1.0
2028	3.1	27.5	29.0	<0.1	9.0	5.0
2029	1.1	9.2	14.8	<0.1	0.8	0.4
2030	8.0	8.0	9.4	<0.1	0.4	0.3
Building A Expansion Maximum Daily Emissions	***8.0***	***27.5***	***29.0***	***<0.1***	***9.0***	***5.0***
Performing Arts Center						
2027	0.5	4.5	6.1	<0.1	0.6	0.2
2028	1.0	8.5	9.9	<0.1	2.5	1.4
2029	3.8	8.2	8.0	<0.1	0.4	0.3
Performing Arts Center Maximum Daily Emissions	***3.8***	***8.5***	***9.9***	***<0.1***	***2.5***	***1.4***
North Campus Athletic Fields						
2026	2.3	20.8	19.6	<0.1	1.0	0.8
2027	3.1	28.1	28.9	<0.1	9.0	5.1
North Campus Athletic Fields Maximum Daily Emissions	***3.1***	***28.1***	***28.9***	***<0.1***	***9.0***	***5.1***
Combined Maximum Daily Emissions[1]	**14.9**	**64.1**	**67.8**	**<0.1**	**20.5**	**11.5**
Screening Threshold	*137*	*250*	*550*	*250*	*100*	*67*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2026

[1] Combined maximum daily emissions are presented without regard for construction year to represent the maximum daily emissions anticipated to be generated by simultaneous construction projects during FMP implementation.

VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter

As shown in Table 3.2-8, the near-term project's combined short-term construction-related criteria pollutant and precursor emissions would be below the screening thresholds during concurrent construction.

Operational Emissions

Operational emissions from the near-term projects proposed under the FMP are accounted for in the emissions calculated for the full buildout of the FMP and provided in Table 3.2-7 above, which demonstrates that the net increase in operational emissions would be below the applicable thresholds. The incremental change in pollutant and precursor emissions as each near-term project becomes operational would be minimal as these projects would replace similar uses with new but expanded facilities. As shown in Table 3.2-7, mobile sources contribute the most to daily emissions and campus-related trips; however, trip generation would not be affected by the near-term projects. The increase in building area proposed by the near-term projects would result in a slight increase in area emissions as

these are proportional to building square footage. While the expanded buildings would likely require more energy, they would remove the use of natural gas which contributes to air pollutant and precursor emissions.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.2.4.3 Sensitive Receptors

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact Discussion

Program-Level

Construction

Implementation of the FMP would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles. These vehicles and equipment could generate the TAC DPM. CARB has declared that DPM from diesel engine exhaust is a TAC, and OEHHA has determined that chronic exposure to DPM can cause carcinogenic and non-carcinogenic health effects. For this reason, although other pollutants would be generated from project construction, DPM is the primary pollutant of concern.

The dose (of TAC) to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance in the environment and the extent of exposure a person has to the substance; a longer exposure period to a fixed quantity of emissions would result in higher health risks. Current models and methodologies for conducting cancer health risk assessments (HRAs) are associated with longer-term exposure periods (typically 30 years for individual residents based on guidance from OEHHA) and are best suited for evaluation of long-duration TAC emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of construction activities. Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime (OEHHA 2015). In addition, concentrations of mobile-source DPM emissions disperse rapidly and are typically reduced by 70 percent at approximately 500 feet (CARB 2005).

Generation of DPM from construction projects typically occurs in a localized area (e.g., at the project site) for a short period of time. Because construction activities and subsequent emissions vary depending on the construction activity, the construction-related emissions to which nearby receptors are exposed would also vary throughout the construction period. During some equipment-intensive activities, such as site preparation or grading, construction-related emissions would be higher than during other, less equipment-intensive activities, such as building construction. Considering the short duration when intensive off-road diesel equipment would be used on the campus, the highly dispersive

nature of DPM, and the fact that construction activities would occur at various locations throughout the campus (not concentrated near any single receptor for extended periods), construction projects implemented under the FMP would not expose sensitive receptors to substantial DPM concentrations.

Operation

Potential impacts to sensitive receptors during project operation are analyzed for CO hotspots and exposure to land uses that typically generate TACs.

CO Hotspots

Vehicle exhaust is the primary source of CO. In an urban setting, the highest CO concentrations are generally found within close proximity to congested intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (i.e., congested intersection) increases. The increased trips associated with future increases in on-campus enrollment have the potential of contributing to localized "hot spots" of CO off-site. Because CO is a byproduct of incomplete combustion, exhaust emissions are worse when fossil-fueled vehicles are operated inefficiently, such as in stop-and-go traffic or through heavily congested intersections.

The SDAPCD has not adopted quantitative screening criteria for when an intersection or road segment might generate CO hotspots. However, the volume of vehicles required to result in a CO hotspot is very high. For example, the Bay Area Air District's screening criteria for CO hotspots is intersections with more than 44,000 vehicles per hour, or intersections with 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway; Bay Area Air District 2023). Based on the Local Mobility Analysis prepared for the FMP, the project is estimated to generate a net increase of approximately 2,623 ADT (LLG 2026). The addition of these trips to nearby intersections would not be of a quantity to generate a CO hotspot given roadway segments near the project site are projected to carry up to 14,407 vehicles per day in 2045 (LLG 2026) and do not include roadway types where vertical and/or horizontal mixing is substantially limited.

Sensitive Receptors

CARB siting recommendations within the *Air Quality and Land Use Handbook* suggest a detailed health risk assessment should be conducted for sensitive receptors within 1,000 feet of a warehouse distribution center, within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet of a typical gas dispensing facilities, within 300 feet of a dry cleaning facility that uses perchloroethylene, or 500 feet of a freeway or urban road with 100,000 or more vehicles per day (CARB 2005). The FMP includes academic, recreational, and parking uses and would not construct these types of sources or represent a substantial source of TACs. No new generators or other utility equipment that would generate substantial TACs are proposed by the FMP. Continued operation of existing equipment and future replacements of existing equipment generating TACs, primarily within the Central Utility Plant, would be subject to SDAPCD permitting requirements, including Rule 1200, which ensures that emissions of TACs do not result in unacceptable health risks. As such, the project would not expose sensitive receptors to substantial pollutant concentrations.

Project-Level

Construction

Implementation of the near-term projects would result in the use of heavy-duty construction equipment, haul trucks, on-site generators, and construction worker vehicles which could generate the TAC DPM. However, as detailed further in the program-level analysis above, based on the short duration when intensive off-road diesel equipment would be used during construction of the near-term projects, the highly dispersive nature of DPM, and the fact that construction activities would occur at various locations (not concentrated near any single receptor for extended periods), construction of the near-term projects would not expose sensitive receptors to substantial DPM concentrations.

Operation

As discussed under the program-level analysis above, buildout of the FMP would not result in the generation of CO hotspots as the addition of campus-related trips to nearby intersections would not exceed screening criteria established by the Bay Area Air District. As such, the near-term projects, which would not directly generate additional vehicle trips, would not result in CO hotspots.

The near-term projects include recreational, academic, and administrative land uses and would not include the land use types or other equipment that generate substantial TACs as described under the program-level analysis above. As such, the near-term projects would not expose sensitive receptors to substantial pollutant concentrations.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not expose sensitive receptors to substantial pollutant concentrations. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.2.4.4 Odors

Threshold 4: Would the project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact Discussion

Program-Level

California Health and Safety Code Sections 41700 and 41705, and SDAPCD Rule 51 prohibit emissions from any source whatsoever in such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to the public health or damage to property. An unreasonable odor discernible at the property line of the project site is considered a significant odor impact.

Implementation of the FMP could produce temporary odors during proposed construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, odors emitted during construction would be temporary, short-term, and intermittent in nature, as they would cease upon the completion of the respective phase of

construction. Accordingly, the FMP would not create objectionable odors affecting a substantial number of people during construction.

According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting activities, refineries, landfills, dairies, and fiberglass molding operations (SCAQMD 1993). The FMP, involving academic, recreational, and parking uses, would not include these odor-generating land uses. Although the FMP would include outdoor planting and farm space for the sustainable agriculture program offered at the City College, it would not involve livestock raising that generates the most substantial agricultural odors and would not be of a scale to produce odor at the property line or elicit odor complaints off-site. The FMP would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Project-Level

The near-term projects could produce odors during construction activities from construction equipment exhaust, application of asphalt, and/or the application of architectural coatings. However, odors emitted during construction would be temporary, short-term, and intermittent in nature, and would cease upon the completion of the respective phase of construction. In addition, the near-term projects proposed under the FMP would not include the land uses associated with odor complaints as described in the program-level analysis above. The near-term projects would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.2.5 Cumulative Impact Analysis

The geographic scope for the air quality plans and air quality standards cumulative analysis is the SDAB. It is appropriate to consider the entire air basin for these thresholds as pollutant emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. Potential impacts to sensitive receptors and odor generation are more localized, and a cumulative impact for these thresholds could occur if concurrent construction or operations would generate substantial pollutants or odorous emissions that would combine to affect neighboring land uses in the immediate vicinity.

3.2.5.1 Air Quality Plans

A metric for assessing a project's cumulative impact with respect to air quality is whether it is consistent with the assumptions underlying an adopted local, regional, or statewide plan, or a related planning document on air quality. Cumulative development projects proposed within the SDAB could propose general plan amendments or land use or zoning changes that result in development that is not accounted for in the growth assumptions that inform the SDAB air quality plans, resulting in a significant cumulative impact. However, as discussed above, implementation of the FMP, including the near-term projects, would not generate emissions that are unaccounted for in regional planning documents. As

such, the contribution of the FMP, including the near-term projects, to the significant cumulative impact **would not be cumulatively considerable**.

3.2.5.2 Air Quality Standards

The SDAB is classified as a nonattainment area under the NAAQS for ozone (8-hour) and as a nonattainment area under the CAAQS for ozone (1-hour and 8-hour), PM_{10}, and $PM_{2.5.}$ The nonattainment status of regional pollutants is a result of past and present development within the SDAB, and this regional impact is cumulative in nature rather than attributable to any one source. Cumulative projects throughout the air basin generate construction and operational emissions of PM and the ozone precursors VOC and NO_X that contribute to significant cumulative air quality impacts. The thresholds of significance established by the SDAPCD (refer to Table 3.2-6) are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions of the SDAB. These thresholds are designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards. As described in Section 3.2.4.2 above, emissions during construction and operation of projects implemented under the FMP would not generate emissions that would violate these thresholds or contribute substantially to an existing or projected air quality violation. As such, the contribution of the FMP, including the near-term projects, to the significant cumulative impact for air quality standards in the SDAB **would not be cumulatively considerable**.

3.2.5.3 Sensitive Receptors

Cumulative development projects could result in significant impacts to sensitive receptors during construction and operation. Although construction of these cumulative development projects would likely be short term and involve construction activities at various locations throughout the project vicinity, it is unknown at this time the scale and nature of these construction activities. In addition, cumulative development projects could result in an increase in trips which contribute to a CO hotspot and could locate sensitive receptors within the CARB siting recommendations within the *Air Quality and Land Use Handbook*. Although cumulative discretionary development projects involving the type of development would likely be required to conduct a Health Risk Assessment and incorporate mitigation measures to reduce these potential impacts to sensitive receptors, cumulative impacts are considered significant. However, as discussed above, implementation of the FMP, including the near-term projects, would not expose sensitive receptors to substantial pollutant concentrations during either construction or operation. Therefore, the FMP would **not result in a cumulatively considerable contribution** to impacts to sensitive receptors.

3.2.5.4 Odors

Cumulative development projects that are proposed on neighboring properties to the City College campus could produce odors similar to the project during construction and operation. Construction odors would be temporary and short term, and even if multiple construction projects occur in close proximity to each other, the respective odorous emissions would cease at the conclusion of construction. Once operational, cumulative development projects near the City College campus are not anticipated to propose land uses typically associated with odor complaints as defined in the SCAQMD CEQA Air Quality Handbook, as the parcels that neighbor the City College campus are not zoned for these types of uses. As discussed above, implementation of the FMP, including the near-term projects,

would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people during construction or operations. Therefore, cumulative impacts related to the production of odors or other emissions would be **less than significant**.

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3.3 Biological Resources

This section addresses the potential biological resources impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to biological resources are also addressed. This section relies on the information and analysis in the project's Biological Resources Technical Report (HELIX 2026), provided as Appendix C to the PEIR.

3.3.1 Environmental Setting

The biological study area described in the Biological Resources Technical Report includes the City College property boundary plus a 100-foot buffer, totaling approximately 73.9 acres. The project site occurs within the boundary of the City of San Diego's (City's) Multiple Species Conservation Program (MSCP; City 1998) Subarea Plan but is outside of, and not directly adjacent to, the City's Multi-Habitat Planning Area (MHPA). The nearest MHPA is approximately 0.5 mile northeast of the project site, within Balboa Park. The project site does not contain lands identified as critical habitat by the U.S Fish and Wildlife Service (USFWS) and is located outside of the Coastal Zone.

The project site consists of buildings, including classrooms and offices, roads, and parking lots associated with City College. The surrounding area is also developed with urban uses such as residential developments, commercial buildings, roads, and freeways. The biological study area is gently sloping and ranges in elevation from approximately 170 feet above mean sea level (AMSL) in the west to 60 feet AMSL in the south. Two soil types were mapped in the biological study area: Urban land (Ur) and made land (Md). Neither of these are considered hydric soils. A HELIX biologist conducted a biological constraints assessment of the biological study area on February 26, 2025, the results of which are described below.

3.3.1.1 Vegetation and Land Cover

One land use type was mapped in the biological study area during the site assessment: developed land. Developed land includes areas of development and redevelopment (locations of existing manufactured structures), roadways, parking lots, pedestrian paths, horticultural open spaces, landscape buffers and courtyards, plazas, gardens, and recreation fields on the campus. Developed land occupies the entire 73.9 acre biological study area. No sensitive habitats or vegetation communities were mapped on-site.

3.3.1.2 Observed Plant and Animal Species

A total of 52 plant species were observed in the biological study area during the site assessment, of which 45 (87 percent) are non-native species, most of which have been planted as ornamental landscaping. A total of 23 animal species were observed or otherwise detected in the biological study area, including 22 birds and 1 mammal. The complete list of plant and animal species observed are provided in Appendices A and B, respectively, of the Biological Resources Technical Report provided as Appendix C to the PEIR.

Special-Status Plant Species

Sensitive plant species, also known as special-status species, are considered uncommon or limited in that they (1) are only found in the San Diego region, (2) are a local representative of a species or

association of species not otherwise found in the region, or (3) are severely depleted within their ranges or within the region. Special-status plants include those that are listed as threatened or endangered by the USFWS or California Department of Fish and Wildlife (CDFW), and those afforded a California Rare Plant Rank (CRPR) designation of 1 or 2 by the California Native Plant Society. CRPR 3 and 4 species are considered watch list species. They are not afforded special status or recognition by the USFWS or CDFW but may be considered sensitive by local jurisdictions.

One special-status plant species was observed during the biological survey conducted on campus: Torrey Pine (*Pinus torreyana* ssp. *torreyana*), which has a California Native Plant Society designation of 1B.2, and is City MSCP Covered and designated as City MSCP Narrow Endemic. No additional special-status plant species which were not observed but have the potential to occur in the project vicinity were identified as having moderate or high potential to occur within the biological study area; the species evaluated for their potential to occur are discussed in Appendix C of Appendix C to the PEIR.

Special-Status Animal Species

Special-status animal species include those that have been afforded special status and/or recognition by the USFWS, CDFW, and/or the City. In general, the principal reason an individual taxon (species or subspecies) is given such recognition is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in many cases from habitat loss.

One special-status animal species was observed during the biological survey: Cooper's Hawk (*Astur cooperii*), which has a CDFW designation of Watch List and is a MSCP Covered species. In addition, a total of twenty special-status animal species were analyzed for their potential to occur within the biological study area (see Appendix D of Appendix C to the PEIR); however, no species were found to have high or moderate potential to occur.

3.3.1.3 Aquatic Resources

Potentially jurisdictional resources do not occur on campus and wetland vegetation communities were not mapped within the biological study area. No wetland or non-wetland features were observed on campus; therefore, no waters subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), or CDFW occur on-site.

3.3.1.4 Wildlife Corridors

Wildlife corridors connect otherwise isolated pieces of habitat and allow for the movement and dispersal of plants and animals. Local wildlife corridors allow animals access to resources such as food, water, and shelter within the framework of their daily routine. Regional corridors provide these functions over a larger scale and link two or more large habitat areas, allowing the dispersal of organisms and the consequent mixing of genes between populations. A corridor is a specific route that is used for the movement and migration of species and may be different from a linkage in that it represents a smaller or narrower avenue for movement. A linkage is an area of land that supports or contributes to the long-term movement of animals and genetic exchange by providing live-in habitat that connects to other habitat areas. Many linkages occur as stepping-stone linkages, which are made up of a fragmented archipelago arrangement of habitat over a linear distance. The biological study area is not identified as a regional wildlife corridor or linkage in the MSCP and no natural habitat occurs within or adjacent to the campus such that it is expected to serve as a wildlife corridor.

3.3.2 Regulatory Framework

A summary of federal, state, District, and local regulations that pertain to biological resources is provided below. There are no regional regulations that would be applicable to the project.

3.3.2.1 Federal

Federal Endangered Species Act

Administered by the USFWS, the Federal Endangered Species Act (FESA) provides the legal framework for the listing and protection of species (and their habitats) that are identified as being endangered or threatened with extinction. Actions that jeopardize endangered or threatened species and the habitats upon which they rely are considered a "take" under the FESA. Section 9(a) of the FESA defines take as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." "Harm" and "harass" are further defined in federal regulations and case law to include actions that adversely impair or disrupt a listed species' behavioral patterns.

The USFWS designates critical habitat for endangered and threatened species. Critical habitat is defined as areas of land that are considered necessary for endangered or threatened species to recover. The goal is to restore healthy populations of listed species within their native habitats, so they can be removed from the list of threatened or endangered species. Once an area is designated as critical habitat pursuant to the FESA, all federal agencies must consult with the USFWS to ensure that any action they authorize, fund, or carry out is not likely to result in destruction or adverse modification of the critical habitat. No designated critical habitat occurs on or adjacent to the campus.

Sections 7 and 10(a) of the FESA regulate actions that could jeopardize endangered or threatened species. Section 7 describes a process of federal interagency consultation for use when federal actions may adversely affect listed species. In this case, take can be authorized via a letter of biological opinion issued by USFWS for non-marine related listed species issues. A Section 7 consultation (formal or informal) is required when there is a nexus between endangered species' use of a site and impacts to USACE jurisdictional areas, or to other areas for which a federal action is required. Section 7 consultations with the USFWS are initiated by the federal agency that will be taking a federal action on a project (e.g., USACE initiates the consultation if they are reviewing a 404 application that results in impacts to occupied listed species habitat). Section 10(a) allows issuance of permits for incidental take of endangered or threatened species with preparation of a Habitat Conservation Plan when there is no federal nexus. The term "incidental" applies if the taking of a listed species is incidental to, and not the purpose of, an otherwise lawful activity. A Habitat Conservation Plan demonstrating how the take would be minimized and how the project would be completed in a manner that would ensure the species' survival must be submitted for issuance of Section 10(a) permits.

Migratory Bird Treaty Act

All migratory bird species that are native to the U.S. or its territories are protected under the federal Migratory Bird Treaty Act (MBTA), as amended under the Migratory Bird Treaty Reform Act of 2004 (Federal Register Doc. 05-5127). The MBTA is generally protective of migratory birds but does not stipulate the type of protection required. In common practice, the MBTA is used to place restrictions on disturbance of active bird nests during the nesting season (generally February 15 to August 31). In addition, the USFWS commonly places restrictions on disturbances allowed near active raptor nests.

Clean Water Act

The USACE regulates impacts to waters of the U.S. under Section 404 of the Clean Water Act (CWA). The purpose of the CWA is to restore and maintain the chemical, physical, and biological integrity of all waters of the U.S. A federal CWA Section 404 Permit would be required for a project to place fill in waters of the U.S. Projects impacting waters of the U.S. could be permitted on an individual basis or be covered under one of several approved nationwide permits. Individual permits are assessed individually based on the type of action, amount of fill, and other factors. Individual permits typically require substantial time (often longer than one year) to review and approve, while nationwide permits are pre-approved if a project meets appropriate conditions.

A CWA Section 401 Water Quality Certification administered by the RWQCB must be issued prior to issuance of a Section 404 Permit. The RWQCB reviews projects for consistency with the achievement of water quality objectives and the reasonable protection of beneficial uses designated in the applicable Water Quality Control Plan. Collectively, wetland and water resources regulated by the State Water Resources Control Board (SWRCB) and RWQCB are referred to as waters of the state, and these resources may or may not include waters of the U.S.

3.3.2.2 State

California Endangered Species Act

Similar to the FESA, the California Endangered Species Act (CESA) of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code [CFG Code] Section 2050 et seq.). The CESA established that it is state policy to conserve, protect, restore, and enhance state endangered species and their habitats. Under state law, plant and animal species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. The CESA authorizes that private entities may "take" plant or wildlife species listed as endangered or threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the CDFW certifies that the incidental take is consistent with the CESA (CFG Code Section 2080.1[a]). For state-only listed species, CFG Code Section 2081 authorizes the CDFW to issue an Incidental Take Permit for state-listed threatened and endangered species if specific criteria are met.

Native Plant Protection Act

The Native Plant Protection Act (Sections 1900-1913 of the CFG Code) directs the CDFW to carry out the state legislature's intent to "…preserve, protect, and enhance endangered or rare native plants of this state." The Native Plant Protection Act gives the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take.

California Fish and Game Code

The CFG Code provides specific protection and listing for several types of biological resources. Pursuant to CFG Code Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the CFG Code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by CFG Code Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. CFG Code Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations can require that

construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

Under CFG Code Sections 1600 et. seq., CDFW regulates activities that would divert or obstruct the natural flow of or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. Such activities require a Streambed Alteration Agreement issued by CDFW with any necessary mitigation to ensure the protection of the state's fish and wildlife resources. The CDFW has jurisdiction over riparian habitats associated with watercourses.

CFG Code Section 2800 et. seq., known as the Natural Community Conservation Planning Act, is intended to conserve, protect, restore, and enhance natural communities. It promotes the protection of natural communities at the ecosystem scale while accommodating compatible land uses. CDFW is the principal state agency implementing the Natural Community Conservation Planning program. Natural Community Conservation Plans developed in accordance with this program provide for comprehensive management and conservation of multiple wildlife species and identify and provide for the regional or area-wide protection and perpetuation of natural wildlife diversity while allowing compatible and appropriate development and growth.

3.3.2.3 District

District Design Guidelines and Standards Manual

General Specifications

Section 2.2, of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to biological resources are anticipated to apply to future projects.

Temporary Tree and Plant Protection

This general specification addresses pre-construction requirements related to tree protection. It requires the contractor to (1) submit the project construction schedule (pursuant to the project's Submittal Requirements) including the time frame for work near existing plant material; (2) provide the transplanting and tree removal schedule including tree transplants and locations; and (3) obtain approval by the Landscape Architect prior to the start of transplanting work and construction near restricted areas. The contractor is additionally required to submit proposed methods for tree and plant protection for approval by the District, including the proposed methods, materials, and schedule for root pruning, construction pruning, aeration, and subsequent tree fertilization.

Tree Protection

The District's Tree Protection general specification requires contractors to protect existing trees during construction by installing fencing at least ten feet beyond the dripline, providing weekly irrigation, and ensuring any damaged roots are clean-cut, inspected, and immediately covered. If branches obstruct work, they must be cleanly pruned only after consulting a certified arborist. When construction activities

compromise a tree's stability, such as causing significant root-zone loss, the District's licensed arborist would determine whether removal is necessary, and the contractor would be responsible for carrying out the removal. Contractors are also responsible for removing and replacing any tree whose trunk or major branches are damaged by equipment with a replacement of equal size and value.

3.3.2.4 Local (Non-Regulatory)

While the District is not subject to local zoning or land use planning documents, the campus is located adjacent to the City's right-of-way (ROW) and could affect street trees within the City ROW; therefore, a summary of City policies related to street tree planting and preservation is provided below. In addition, although the City College campus is not included within the City's MSCP and as such its policies are not applicable to the campus, the MSCP was considered during the preparation of the FMP biological resources analysis due to its applicability to the surrounding region.

City of San Diego Multiple Species Conservation Plan

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City, implement their portions of the MSCP through Subarea Plans (SAPs), which describe specific implementing mechanisms. The City's MSCP SAP was approved in March 1997. The MSCP SAP is a plan and process for the issuance of permits under the FESA and CESA and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP SAP is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City signed an Implementing Agreement with USFWS and CDFW. The Implementing Agreement serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and SAP. The Implementing Agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP. The campus is within the City but is not included within the City's MSCP, nor is the District an enrolled agency in the Natural Communities Conservation Planning (NCCP) program. Preserve areas designated by the City's MSCP (i.e., MHPA) are not located on City College property. The nearest MHPA is approximately 0.5 mile northeast of the biological study area, in Balboa Park.

City of San Diego Public Tree Protection Policy

The City's Public Tree Protection Policy (Council Policy 900-19) establishes rules to safeguard trees located in public ROWs, City-owned parks and open spaces, and certain private lands under open-space easements. Under this policy, all public trees within the City that are classified as trees (defined as having a single trunk or can be trained into distinctive multi-trunks versus branches) and that have a caliper of at least eight inches measured at four feet above the ground surface, shall be considered as potentially qualifying under this tree protection policy. The policy allows property owners to voluntarily designate trees on private property for protection status, which can be recorded as a deed restriction, and emphasizes maintaining the City's "Community Forest" through planting, maintenance, and regulated removal. While protected trees are generally preserved, the policy permits removal when a tree poses a public safety hazard and reasonable corrective measures have been exhausted. The Public

Tree Protection Policy utilizes the City's Tree Advisory Board, which advises on urban forestry practices and helps identify heritage or landmark trees. The policy additionally establishes penalties for the unauthorized removal or damage of protected public trees.

City of San Diego Planting of Trees on City Streets Policy

The City's Planting of Trees on City Streets Policy (Council Policy 200-05) establishes guidelines for planting, maintaining, and removing street trees within the City's jurisdiction. It assigns the Parks and Recreation Department responsibility for approving tree species and planting locations based on the City's Landscape Technical Manual, waives permit fees for street-tree planting, and places responsibilities for routine care, such as watering and fertilizing, on adjacent property owners unless a maintenance assessment district exists. The policy encourages adding and replacing trees in public ROW when funding is available and outlines conditions for tree removal, such as when a tree is dead or poses safety concerns. The policy states that street trees shall be removed at public expense if they meet any one of the following criteria: (1) the tree is dead; (2) the tree is a hazard; or (3) the tree is damaging public improvements. The policy additionally states that a no-fee permit to remove a street tree at private expense shall be issued if both of these criteria are met: (1) the owner of the fronting property requests the permit from the City; and (2) the tree is not part of a uniform street tree planting or a significant neighborhood asset. The Parks and Recreation Department has authorized the Development Services Department to issue the No Fee Permit, which is required for all street tree planting, pruning, and removal.

San Diego Municipal Code Article 2 Division 6: Street Planting

Article 2, Division 6 of the San Diego Municipal Code establishes the City's rules for planting, maintaining, protecting, and removing trees and other vegetation within public ROWs, defining "street" broadly to include public streets, alleys, lanes, and parkways. Its purpose is to safeguard public health, safety, welfare, and overall quality of life by regulating how the City's "Community Forest" is managed, ensuring orderly planting, preventing damage to public infrastructure, and preserving the aesthetic and environmental value of street trees. The division grants the City's Parks and Recreation Department authority over all such vegetation and outlines definitions, responsibilities, and restrictions to ensure consistent stewardship of greenery in public spaces. A permit from the Parks and Recreation Director is required prior to the planting or the removal or pruning of any tree, palm, shrub or plant within the City's jurisdiction.

3.3.3 Thresholds of Significance

Thresholds used to evaluate potential biological resources impacts are based on CEQA Guidelines Appendix G. A significant biological resources impact could occur if implementation of the proposed project would:

1. 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 CDFW or USFWS;

2. 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 CDFW or USFWS;

3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

4. 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;

5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or

6. Conflict with provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.3.4 Impact Analysis

3.3.4.1 Special-Status Species

Threshold 1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

Impact Discussion

Program-Level

As discussed under Section 3.3.1.2 above, one special-status plant species (Torrey pine) and one special-status animal species (Cooper's hawk) were observed within the biological study area. No additional sensitive plant or animal species that were not observed during surveys have high or moderate potential to occur on campus or use habitat on or near projects implemented under the FMP. Torrey pine is believed to have been planted on campus due to its size and location within developed habitat; therefore, impacts to these individuals would not be considered significant. It is not anticipated that implementation of the FMP would result in significant adverse effects to listed plant species, given that improvements would occur within the footprint of the developed campus where sensitive plant species do not occur.

Cooper's hawk was recorded flying over the campus and could utilize mature trees located on or near anticipated development areas. Implementation of the FMP could affect mature trees that could be used by Cooper's hawk for nesting. In addition, implementation of the FMP has the potential to affect other species of nesting birds, as some species nest in developed areas. Red-tailed hawk (*Buteo jamaicensis;* not a listed species), another raptor species, was observed on campus in addition to Cooper's hawk. Nests and eggs of raptors and other nesting birds are protected under the federal MBTA and CFG Code. Therefore, construction activities such as grubbing, trimming, or clearing of trees or vegetation during the breeding season of these species have the potential to result in adverse effects to raptors and other nesting birds, including Cooper's hawk.

Indirect impacts could occur during construction as well as post-construction operations. While there were no sensitive habitats mapped within the biological study area buffer surrounding campus, potential indirect impacts from the implementation of the FMP may include decreased water quality

(e.g., through sedimentation, contaminants, or fuel release) or noise generation. Water quality in off-site riparian areas could be adversely affected by potential surface runoff and sedimentation during construction due to the use of petroleum products (i.e., fuels, oils, lubricants) and erosion of cleared land. However, the District would be required to minimize effects to water quality during and after construction through adherence to a Stormwater Pollution Prevention Plan (SWPPP) or Water Quality Management Plan (refer to Section 3.9.4.3) for the ground-disturbing projects implemented under the FMP.

Construction-related noise from activities such as clearing, grubbing, and grading within approximately 500 feet of a nest could additionally result in temporary indirect impacts to wildlife. Breeding birds may temporarily or permanently leave their territories to avoid disturbances from construction activities, which could lead to reduced reproductive success and increased mortality. Construction noise generation has the potential to have an indirect adverse effect on state or federally listed species, including nesting raptors.

Project-Level

As discussed in the program-level analysis above, it is not anticipated that implementation of the FMP, including the near-term projects, would result in adverse effects to listed plant species, given improvements would occur within the developed campus. However, as Cooper's hawk was recorded flying over the campus and mature trees that could be used for nesting by Cooper's hawk or other protected species occur around each of the near-term project locations, the near-term projects could adversely affect nesting of these species.

In addition, as discussed above, implementation of the near-term projects could result in indirect impacts related to water quality and construction noise. The District would be required to minimize water quality effects during and after construction of the near-term projects through implementation of SWPPPs or Water Quality Management Plans. However, construction noise generated within approximately 500 feet of a nest during the breeding season has the potential to adversely affect nesting birds or raptors.

Level of Significance Prior to Mitigation

Program-Level

Direct impacts to an active Cooper's hawk nest or nesting birds and raptors protected under the MBTA and CFG Code would be considered potentially significant. Nesting raptors, including Cooper's Hawk, may also be susceptible to disturbance from construction activity, and indirect impacts from construction noise within 500 feet of an active nest would be potentially significant. Indirect impacts from decreased water quality would be less than significant with adherence to applicable water quality regulations. Overall, the **program-level impact would be significant prior to mitigation**.

Project-Level

The near-term projects proposed under the FMP could result in an adverse direct effect on Cooper's hawk or other nesting birds and raptors protected under the MBTA and CFG Code, and adverse indirect effects to nesting raptors from construction noise within 500 feet of an active nest. These **project-level impacts would be significant prior to mitigation**. Similar to the FMP program-level analysis above,

indirect impacts from decreased water quality would be less than significant at the project level with adherence to applicable water quality regulations.

Mitigation Measures

Program-Level

BIO-1 Raptor Nest Avoidance. To avoid potential impacts to active raptor nests, if construction commences during the raptor nesting season (generally January 15 through July 31), pre-construction surveys for such nests shall be performed by a qualified biologist within 500 feet of proposed construction activities no more than seven days before the initiation of construction. Construction activities within 500 feet of an identified active raptor nest shall not commence during the breeding season until a qualified biologist determines that the nest is no longer active or appropriate avoidance measures have been implemented. Trees with inactive nests can be removed outside of the breeding season without causing an impact.

BIO-2 Nesting Bird Avoidance. Grubbing, trimming, or clearing of vegetation shall occur outside of the general avian breeding season, which is typically February 15 through August 31. If grubbing, trimming, or clearing cannot feasibly occur outside of the general avian breeding season, a qualified biologist shall perform a pre-construction nesting bird survey no more than seven days before the commencement of vegetation clearing or grubbing to determine if active bird nests are present in the affected areas. Should an active bird nest be located, the project biologist shall direct vegetation clearing away from the nest until it has been determined by the project biologist that the young have fledged, or the nest has failed. If there are no nesting birds (including nest building or other breeding/nesting behavior) within the proposed impact area, clearing, grubbing, grading, and tree removal shall be allowed to proceed.

Project-Level

The near-term projects proposed under the FMP would be required to implement mitigation measures BIO-1 and BIO-2.

Level of Significance After Mitigation

Implementation of mitigation measures BIO-1 and BIO-2 would reduce program-level and project-level impacts to nesting raptors and nesting birds protected by the MBTA to a level that is **less than significant**.

3.3.4.2 Sensitive Habitats

Threshold 2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

Impact Discussion

Program-Level

As discussed under Section 3.3.1.1, the entirety of the biological study area was mapped as developed land and no sensitive vegetation communities or riparian habitats occur within or adjacent to campus. Since no riparian habitat or sensitive vegetation communities occur within the biological study area, implementation of the FMP would not have a substantial adverse effect on riparian habitat or other sensitive natural communities.

Project-Level

As stated under the program-level analysis above, the entirety of the biological study area was mapped as developed land and no sensitive vegetation communities occur. As the near-term projects proposed under the FMP would occur within the biological study area, the near-term projects would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.3.4.3 Wetlands

Threshold 3: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact Discussion

Program-Level

As discussed under Section 3.3.1.3 above, potentially jurisdictional resources do not occur on campus and wetland vegetation communities were not mapped within the biological study area. As no federally protected wetlands occur within the biological study area, implementation of the FMP would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA through direct removal, filling, hydrological interruption, or other means.

Project-Level

As stated under the program-level analysis above, no federally protected wetlands occur within the biological study area. As the near-term projects proposed under the FMP would occur within the

biological study area, the near-term projects would not result in a substantial adverse effect on federally protected wetlands.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA**. Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.3.4.4 Wildlife Corridors

Threshold 4: Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Discussion

Program-Level

The biological study area is not identified as a regional wildlife corridor or linkage in the MSCP. No natural habitat occurs within or adjacent to the campus and the campus is entirely surrounded by urban development. Therefore, the City College campus and the surrounding area do not provide habitat connectivity or act as a wildlife corridor or linkage. Therefore, implementation of the FMP would not interfere substantially with the movement of native species or with established corridors, or impede the use of native wildlife nursery sites.

Project-Level

As stated under the program-level analysis above, the biological study area is not identified as a regional wildlife corridor or linkage and does not provide habitat connectivity. As the near-term projects would occur in small portions of previously developed land within the biological study area, implementation of the near-term projects would not interfere substantially with the movement of native species or with established corridors, or impede the use of native wildlife nursery sites.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not 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. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.3.4.5 Local Policies or Ordinances

Threshold 5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Discussion

Program-Level

The District has two policies regarding trees: the Temporary Tree and Plant Protection Construction Schedule Policy and the Tree Protection Policy, further described under Section 3.3.2.3. Each project implemented under the FMP would be required to follow these standard policies for tree protection during construction. The FMP includes planting of new trees along Park Boulevard, most of which would occur on campus; however, some planting may extend into City ROW. For project activities within the roadways adjacent to campus and under the City's jurisdiction, the City's tree protection policies would apply to trees meeting the designation criteria outlined in Council Policy 900-19, and would require permit approval from the City prior to pruning or removal of a qualifying tree within the City's ROW. In addition, project activities involving tree planting or removal within the City's jurisdiction would be required to comply with San Diego Municipal Code Article 2 Division 6 (Street Planting), which would require a permit from the City prior to the planting or removal/pruning within the City's ROW. With adherence to applicable District and City tree regulations, no conflicts with local policies protecting biological resources are expected to occur with the implementation of the FMP.

Project-Level

As discussed above, projects implemented under the FMP, including the near-term projects, would be required to comply with the District's tree planting and protection policies. In addition, if the near-term projects extend into the City's ROW and would affect street trees, they would be required to comply with the applicable City tree preservation/street tree policies described above. With compliance with these District and local policies, the near-term projects would not result in conflicts with local policies protecting biological resources.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.3.4.6 Conservation Plans

Threshold 6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact Discussion

Program-Level

The City College campus is not included within the City's MSCP, nor is the District an enrolled agency in the NCCP program. Thus, the MSCP is not applicable to District projects carried out on campus. However, the MSCP was considered during the preparation of the project's biological resources analysis due to its applicability to the surrounding region. Where appropriate, the District's analysis of biological impacts reflects the standards established by the MSCP, including species and vegetation communities' sensitivities. The FMP does not propose development that would directly or indirectly affect the biological resources occurring on MHPA lands; therefore, implementation of the FMP would not conflict with the City's MSCP or the NCCP program.

Project-Level

As discussed in the program-level analysis above, the FMP, including the near-term projects, does not propose development that would directly or indirectly affect the biological resources occurring on MHPA lands, and no conflict with the City's MSCP or the NCCP program would occur.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.3.5 Cumulative Impact Analysis

The geographic scope for the biological resources cumulative analysis is San Diego County. In 1991, the State of California passed the NCCP Act, providing for the long-term, regional conservation of natural vegetation and wildlife diversity. The MSCP Plan is the framework NCCP plan for southwestern San Diego County. The USFWS and CDFW jointly adopted the MSCP Plan in 1997. As part of that approval process, a Joint Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) was prepared, which addressed the cumulative impacts to biological resources from growth in the San Diego region. While the City College campus is not a part of the MSCP planning effort or a formal part of the MSCP study area and the District is not an enrolled agency in the NCCP program, the Final MSCP Plan (City 1998) and its associated Joint EIR/EIS (City and USFWS 1996) were considered in the cumulative analysis below as they address regionwide biological resources impacts from development.

3.3.5.1 Special-Status Species

As described in the Joint EIR/EIS prepared for the MSCP Plan, implementation of the MSCP Plan would result in cumulatively significant direct impacts to its 85 covered species; however, assembly and

management of the MHPA would reduce these cumulative impacts below a level of significance (City and USFWS 1996). Biological surveys conducted on campus found two MSCP-covered species in the biological study area (Torrey pine [planted/not naturally occurring] and Cooper's hawk). No other MSCP-covered species are considered to have high or moderate potential to occur on campus. Of the 85 species covered in the MSCP Plan, the FMP would potentially contribute to impacts to two of those species (Torrey pine and Cooper's hawk). With implementation of mitigation measures BIO-1 and BIO-2, incremental impacts to special-status species associated with the FMP **would not be cumulatively considerable**.

3.3.5.2 Sensitive Habitats

Cumulative development projects within or adjacent to areas containing sensitive habitat have the potential to result in the cumulative loss of sensitive habitats or natural communities. Implementation of the FMP, including the near-term projects, would not contribute to the loss of native vegetation communities in the San Diego region as the campus is entirely comprised of developed land. As such, FMP impacts related to sensitive habitats **would not be cumulatively considerable**.

3.3.5.3 Wetlands

Cumulative development projects within or adjacent to wetlands have the potential to result in the cumulative loss of wetlands. Implementation of the FMP, including the near-term projects, would not result in impacts to wetlands as potentially jurisdictional resources and wetland vegetation communities do not occur on or adjacent to campus. Therefore, FMP impacts related to federally protected wetlands **would not be cumulatively considerable**.

3.3.5.4 Wildlife Corridors

Cumulative development projects occurring within existing wildlife corridors and inhibiting movement through these areas have the potential to result in the cumulative loss of wildlife corridors and associated breeding areas. As discussed under Section 3.3.4.4, the biological study area is not identified as a regional wildlife corridor and no natural habitat occurs within or adjacent to the campus. Therefore, implementation of the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to impacts related to wildlife corridors.

3.3.5.5 Local Policies or Ordinances

Implementation of the FMP, including the near-term projects, would be required to comply with the District's tree planting and preservation policies, and, where applicable, the City's tree policies. Cumulative development projects would also be required to comply with the applicable local policies protecting biological resources. Compliance with these local policies would ensure that development does not result in the cumulative loss of local biological resources such as trees. Therefore, cumulative impacts related to conflicts with local policies or ordinances would be **less than significant**.

3.3.5.6 Conservation Plans

As part of the MSCP planning process, lands were identified for assembly into a comprehensive preserve for the conservation of biological resources. That preserve is referred to as the MHPA and was cooperatively designed by the participating jurisdictions and special districts in the MSCP study area in partnership with the wildlife agencies (CDFW and USFWS), property owners, and representatives from

private industry and environmental groups. The MHPA conserves vacant land, including habitat and other vacant lands that contribute to the preserve design. As noted above, implementation of the MSCP Plan would result in cumulatively significant direct impacts to the 85 covered species (City and USFWS 1996). Assembly and management of the MHPA as part of the MSCP and other NCCP plans would reduce these cumulative impacts to less than significant levels. Cumulative indirect impacts to native vegetation communities associated with edge effects and increased development pressure outside the MHPA were not considered significant due to the measures in the plans that address these effects. As discussed in Section 3.3.4.6, the FMP, including the near-term projects, does not propose development that would directly or indirectly affect the biological resources occurring on MHPA lands, and no conflict with the City's MSCP or the NCCP program would occur. As such, the FMP contribution to significant cumulative impacts related to the MSCP **would not be cumulatively considerable**.

3.4 Cultural Resources

This section addresses the potential cultural resources impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to cultural resources are also addressed. This section relies on the information and analyses in the Archaeological Technical Report (HELIX 2026a) and Historic Resources Survey Report (HELIX 2026b), provided as Appendix D and Appendix E to the PEIR, respectively.

3.4.1 Environmental Setting

Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, and/or scientific importance. Significant cultural resources are designated as "historical resources," and are defined per Public Resources Code (PRC) 21084.1 and CEQA Guidelines Section 15064.5. For the purposes of this PEIR, discussion of historical resources is divided between built environment or historic resources, which consist of historic buildings, structures, objects, or sites, and archaeological resources, which refers to prehistoric or historic archaeological resources or human remains.

Cultural resources cannot be adequately evaluated without first taking into consideration the historic context(s) with which they are associated. The cultural history in San Diego County (County) presented below is based on documentation from both the archaeological and ethnographic records and represents a continuous human occupation in the region spanning the last 10,000 years. While this information comes from the scientific reconstructions of the past, it does not necessarily represent how the Kumeyaay see themselves. While the material culture of the Kumeyaay is contained in the archaeological record, their history, beliefs and legends have persevered and are retained in the songs and stories passed down through the generations. It is important to note that Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas. More detailed historic contexts are provided in the Archaeological Technical Report and Historic Resources Survey Report, provided as Appendix D and Appendix E to the PEIR, respectively.

3.4.1.1 Prehistoric Period

Prior to historic and modern activities, the project vicinity would have consisted of grassland communities and coastal sage scrub on the mesa, with stands of riparian vegetation within major drainages such as along the San Clemente, Rose, and Tecolote canyons. The riparian community would have consisted of plants such as sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), coast live oak (*Quercus agrifolia*), and willow (*Salix* spp.). Major wildlife species found in this environment prehistorically were coyote (*Canis latrans*), mule deer (*Odocoileus hemionus*), grizzly bear (*Ursus arctos*), mountain lion (*Puma concolor*), rabbit (*Sylvilagus audubonii*), jackrabbit (*Lepus californicus*), and various rodents, the most notable of which are the valley pocket gopher (*Thomomys bottae*), California ground squirrel (*Spermophilus beecheyi*), and dusky footed woodrat (*Neotoma fuscipes*). Acorns and grass seeds were staple vegetal food resources in the Late Prehistoric Period in southern California. Rabbits, jackrabbits, and rodents were important to the prehistoric diet as well; deer were somewhat less significant for food but were an important source of leather, bone, and antler. In addition, many of the plant species naturally occurring in the project vicinity are known to have been used by native populations for medicine, tools, ceremonial, and other uses.

3.4.1.2 Ethnohistoric Period

The Ethnohistoric Period, sometimes referred to as the ethnographic present, commenced with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. The founding of Mission San Diego de Alcalá in 1769 brought about profound changes in the lives of the Kumeyaay people. Many of the coastal Kumeyaay died from introduced diseases or were brought into the mission system. Earliest accounts of Native American life in what is now San Diego were recorded as a means to salvage scientific knowledge of native lifeways. These accounts were often based on limited interviews or biased data collection techniques. Later researchers and local Native Americans began to uncover and make public significant contributions in the understanding of native culture and language. These studies have continued to the present day and involve archaeologists and ethnographers working in conjunction with Native Americans to address the continued cultural significance of sites and landscapes across the County. The Kumeyaay are the Most Likely Descendants for all Native American human remains found in the City of San Diego (City).

The project site is located within the traditional territory of the Kumeyaay, also known as Ipai, Tipai, or Diegueño (named for Mission San Diego de Alcalá). At the time of Spanish contact, Yuman-speaking Kumeyaay bands occupied southern San Diego and southwestern Imperial counties and northern Baja California. The Kumeyaay are a group of exogamous, patrilineal territorial bands that lived in semisedentary, politically autonomous villages or rancherias. Most rancherias were the seat of a clan, although it is thought that, aboriginally, some clans had more than one rancheria and some rancherias contained more than one clan. Several sources indicate that large Kumeyaay villages or rancherias were located in river valleys and along the shoreline of coastal estuaries. They subsisted on a hunting and foraging economy, exploiting the region's diverse ecology throughout the year; coastal bands exploited marine resources while inland bands might move from the desert, ripe with agave and small game, to the acorn- and pine nut-rich mountains in the fall.

At the time of Spanish colonization in the late 1700s, several major Kumeyaay villages were located in proximity to the project site. To the north, was the village of *Cosoy*, located approximately 3.7 miles to the northwest of the project site, along the south side of the San Diego River near the location of the San Diego Presidio and the first location of the Mission de Alcalá. Another nearby village to the north was the village of *Jamo* (Rinconada) located approximately 6.7 miles to the northwest of the project site, along the west side of Rose Canyon, where the Rose Canyon drainage enters into Mission Bay. These village locations were documented as inhabited at the inception of Spanish colonization when they were visited by the Spanish during the Portolá expedition in 1769. A third nearby village to the north was the village of *Nipaquay,* located upriver along the north side of the San Diego River, at the second and final location of the San Diego Mission de Alcalá, approximately 5.2 miles to the northeast of the project site. A fourth nearby village, indicated to also be located along the lower San Diego River, was the village of *Sinyeweche* to the east of the village of *Nipaquay*. To the south, the village of *Ehpaa* (Las Chollas) was located at the mouth of Las Chollas Creek, along San Diego Bay, approximately 2.7 miles southeast of the project site.

The presence of some of these Kumeyaay villages at or near the locations of early Spanish facilities (e.g., *Cosoy* and *Nipaquay*) was not accidental. The Spaniards chose these locations because there were native villages present in proximity. Some native speakers referred to river valleys as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast. It is likely that the Kumeyaay people used the San Diego River valley and other significant east-west trending water courses as travel corridors from interior coastal plain areas to and from villages located along and at the

mouth of the river, such as *Cosoy, Jamo, Nipaguay*, and *Sinyeweche,* as well as other villages along the coast to the north and south of the river and the project site, including *Ystagua*, *Onap*, *Peñasquitos*, *Pawai/Pawaii/Paguay*, *Apusquel*, and *Chiap*.

Archaeological Record

Archaeological evidence indicates that the earliest well-documented prehistoric occupation in the San Diego region dates to the San Dieguito Tradition, beginning more than 9,000 years ago. This tradition is generally characterized by a subsistence emphasis on hunting, with diagnostic artifacts including elongated bifaces, scrapers, crescentics, and leaf-shaped projectile points.

The San Dieguito Tradition was followed by occupations during the Archaic Period (circa 8600–1300 Before Present), represented locally by the La Jolla complex along the coast and the Pauma complex inland. These complexes are part of the Encinitas Tradition and Early Milling Stone Horizon and reflect a shift toward a more generalized subsistence economy with an increased emphasis on plant resources, particularly seeds, as well as shellfish and small game. Archaic Period sites are most common along the coast, near estuaries, and in near-coastal valleys, and are less frequent in inland foothill areas. Artifact assemblages from this period are dominated by milling implements such as manos and metates, along with cobble tools and a range of other stone, bone, and ornamental artifacts.

The Late Prehistoric Period (circa 1500 Before Present to Common Era 1769) is marked by notable changes in technology, subsistence, and social organization, including higher population densities. In the County, this period is represented by the San Luis Rey complex in the north and the Cuyamaca complex in the south. Late Prehistoric assemblages commonly include arrow points, pottery (notably Tizon Brownware), milling tools, and mortars and pestles. Subsistence strategies emphasized acorns and grass seeds, supplemented by small game, with larger game, fish, and shellfish playing secondary roles except in coastal settings. Settlement patterns are interpreted as seasonally occupied villages supported by a central-based collecting strategy.

3.4.1.3 Historic Period

There are three general eras in California history: the Spanish, Mexican, and American periods.

Spanish Period

While Juan Rodríguez Cabrillo visited San Diego briefly in 1542, the beginning of the historic period in the San Diego area is generally given as 1769. In the mid-eighteenth century, Spain had escalated its involvement in California from exploration to colonization and, in that year, a Spanish expedition headed by Gaspar de Portolá and Junípero Serra established the Royal Presidio of San Diego. A small pueblo, now known as Old Town San Diego, developed below the presidio. Portolá then traveled north from San Diego seeking suitable locations to establish military presidios and religious missions to extend the Spanish Empire into Alta California.

Initially, both a mission and a military presidio were located on Presidio Hill overlooking the San Diego River. The Mission San Diego de Alcalá was constructed in its current location five years later. The missions and presidios stood, literally and figuratively, as symbols of Spanish colonialism, importing new systems of labor, demographics, settlement, and economies to the area. Cattle ranching, animal husbandry, and agriculture were the main pursuits of the missions.

Mexican Period

Although Mexico gained its independence from Spain in 1821, Spanish patterns of culture and influence remained for a time. The missions continued to operate as they had in the past, and laws governing the distribution of land were also retained in the 1820s. Following secularization of the missions in 1834, large ranchos were granted to prominent and well-connected individuals, ushering in the Rancho Era, with the society making a transition from one dominated by the church and the military to a more civilian population, with people living on ranchos or in pueblos. With the numerous new ranchos in private hands, cattle ranching expanded and prevailed over agricultural activities. These ranches put new pressures on California's native populations, as grants were made for inland areas still occupied by the Kumeyaay, forcing them to acculturate or relocate farther into the backcountry. In rare instances, former mission neophytes were able to organize pueblos and attempt to live within the new confines of Mexican governance and culture. The most successful of these was the Pueblo of San Pasqual, located inland along the San Dieguito River Valley, founded by Kumeyaay who were no longer able to live at the Mission San Diego de Alcalá.

Land was also granted to pueblos with locally elected town councils. In 1833, San Diego submitted a petition to Governor Figueroa asking for formal recognition as a pueblo and, in 1834, was granted permission to establish a municipal government. However, partially due to the establishment of the ranchos in the backcountry areas and the subsequent population shift to the ranchos, the pueblo's population shrunk from nearly 500 people in 1834 to 150 people in 1841. Consequently, the town council was replaced by a justice of the peace in 1838. A few years later, in 1845, the town was allowed a governor-appointed sub-prefect, Santiago Arguello, who commissioned a survey of the pueblo lands; the resulting map was signed by Governor Pio Pico in 1846, establishing the pueblo as over 48,000 acres of land.

American Period

American governance began in 1848, when Mexico signed the Treaty of Guadalupe Hidalgo, ceding California to the United States at the conclusion of the Mexican-American War. An influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors, including the discovery of gold in the state in 1848, the end of the Civil War, the availability of free land through passage of the Homestead Act, and, later, the importance of the County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in American and European populations quickly overwhelmed many of the Spanish and Mexican cultural traditions and greatly increased the rate of population decline among Native American communities.

While the American system required that the newly acquired land be surveyed prior to settlement, the Treaty of Guadalupe Hidalgo bound the United States to honor the land claims of Mexican citizens who were granted ownership of ranchos by the Mexican government. The Land Act of 1851 established a board of commissioners to review land grant claims and land patents for the land grants were issued throughout the following years. In 1874, San Diego received a land patent for 47,323 acres, which was slightly less than the size of the original pueblo lands, due to 1,233 acres within Point Loma being assigned as a military reservation.

In the early years of the American Period, Old Town remained the center of civic life in the area; however, the San Diego River was prone to major floods and, in the 1870s, downtown San Diego, then known as Horton's Addition, became the urban center. The San Diego River, however, remained a main

source of water for the growing town. While the first attempt to build a dike to route the San Diego River into what was then known as "False Bay" (now known as Mission Bay) occurred in the 1850s, it was not until the 1870s that a more permanent channel was constructed.

In the late 1860s, Alonzo Horton began the development of New San Diego and began the shift of commerce and government centers from Old Town (San Diego pueblo) to New Town (now downtown). Development from downtown San Diego initially began to spread eastward, in part, by following natural transportation corridors. The 1880s saw "boom and bust" cycles that brought thousands of people to the County. During this period hotels, boarding houses, and rental cottages were constructed downtown to accommodate many of the working class laborers and skilled tradesmen and their families that had come to the newly developing city. However, by the end of the decade, many of the newcomers had left, although some remained to form the foundations of small communities based on dry farming, orchards, dairies, and livestock ranching. During the late nineteenth and early twentieth centuries, rural areas of the County developed small agricultural communities centered on one-room schoolhouses. Such rural farming communities consisted of individuals and families tied together through geographical boundaries, a common schoolhouse, and a church.

After the economic slowdown of the 1890s, residential, commercial, and industrial use expanded in the City. While the project site was removed from the central commercial area of downtown San Diego, by the turn of the century the project site had been divided into developed blocks and contained primarily sparse residential development.

Balboa Park, located immediately to the north, had been granted in 1868, but remained primarily wild land until the 1890s when it began to be transformed into a designed landscape. In 1902, a landscape architect, Samuel Parsons, was hired to prepare a comprehensive plan for the public park. Funds were raised for his plan, planting development continued, and by 1910 the parkland began to look much as it does today. The name "Balboa" was selected during a naming contest in honor of the famous Spanish explorer Vasco Núñez de Balboa. The continued development of Balboa Park owes much to the two world fairs of the early twentieth century, the Panama-California Exposition of 1915-1916, and the California Pacific International Exposition of 1935-36. These two events marked the beginning and the continued development of Balboa Park's cultural center that exists today.

During the last decades of the nineteenth century and into the early twentieth, Native American villages or camps were located within undeveloped areas east of the City. In the 1880s, there were references to an "Indian Camp" in the vicinity of 12th and M Streets, Third and Beech Streets, and 27th and K Streets. From approximately 1860 to 1890, a large encampment composed of Native Americans from Baja California occupied the mesas and canyons east of the current campus, and a large ranchera was located northeast of the campus, near the intersection of Florida and Pershing Drives. As the City developed and expanded, these communities were pushed eastward, until they ultimately settled in areas such as Lakeside, El Cajon, and the Jamacha area.

By the late 1940s, the area containing the project site consisted of a mix of homes, apartments, and small businesses. Multi-story apartment buildings were constructed and numerous automobile repair businesses were established in the area. Other businesses, such as grocery stores, furniture shops, and a sign studio, opened in the area as well. By the 1960s, the area was noted to suffer from "dreary" and "blighted" vacant properties with dilapidated structures.

3.4.1.4 Campus History

The District was established in 1914, when the first two-year postsecondary course of study was established in San Diego and classes were taught in San Diego High School. In 1953 and 1954, the block between Russ Boulevard and A Street, from 14th to 15th Streets, was purchased as the first parcel of land that would become the City College campus over the following decades. Six historic contexts have been identified for the evaluation of built resources on the City College campus. The contexts are organized chronologically and capture major patterns and trends in the campus' development history that are expressed in its extant built resources. Within some contexts are one or more themes that provide a focus related to a particular property type. The full historic context statement for City College is provided in Appendix E to the PEIR. In summary, the contexts and themes associated with the campus are as follows:

- **History of the San Diego Community College District.** The District, formally established in 1972, consists of three credit-granting institutions and a continuing education center, the oldest of which is City College, which opened in 1914. The others consist of Mesa College, which opened in 1962; Miramar College, which opened in 1969; and the Educational Cultural Complex, which opened in 1976. This context describes the history of the District, starting with the opening of San Diego Junior College in 1914, through the modern day.

- **Early Settlement and Development in Linda Vista and Clairemont.** Modern-day downtown San Diego dates to the late nineteenth century, when the area experienced a population boom due to the efforts of boosters such as Alonzo E. Horton. The population of the downtown area decreased as the expansion of freeways allowed for the growth of suburban neighborhoods and commercial centers. The 1960s saw the redevelopment of the downtown area, with the new Civic Concourse spurring new development in the area.

- **Campus Development.** The San Diego City College campus consists of approximately 26 buildings/structures, nearly half of which were built between 1956 and 1980. A total of 13 extant buildings and three extant structures/plazas are 40 years of age or older, with most being built in the 1970s due to the City College Expansion Project. The remaining buildings/structures were built between the 1990s and 2020s, with most built in the 2010s.

- **Social and Cultural Development.** This context discusses the social and cultural development of City College. First, the Civil Rights Movement and the subsequent rise of student activism and prominent student groups on campus is discussed, followed by a discussion of the creation of City College's ethnic studies program and student support services.

- **Architecture and Design.** This context provides an overview of the predominant architectural styles, International (circa 1925-1965; Buildings A and T), Brutalism (circa 1950-1970; Buildings D, L, and M), Post-and-Beam (circa 1950-1970; Buildings C, D, L, and M, and Saville Theatre), which are found on the City College campus. For each style, a list of character-defining features is presented to help in both identification and to help guide the evaluation of buildings and structures that may have significance for embodying the characteristics of a specific architectural style and/or form.

- **Architects.** Original building plans and other District records indicate that two different architecture firms designed the extant buildings and structures at City College that were

constructed between 1956 and 1985 (40 years of age or older). The firms include the following: Frank L. Hope & Associates and Richard J. Lareau & Associates.

3.4.1.5 Archaeological Resources

Records Search

HELIX conducted a record search of the California Historical Resources Information System (CHRIS) for the project site and a surrounding 0.5-mile radius at the South Coastal Information Center (SCIC) on February 18, 2025. The records search indicated that 385 cultural resources have been previously recorded within the 0.5-mile search radius, 12 of which are located within 250 feet of the project site and are shown in Table 3.4-1, *Previously Recorded Resources Within 250 Feet of the Project Site*. Of these resources, four are recorded within the project site and are discussed further below.

Table 3.4-1
PREVIOUSLY RECORDED RESOURCES WITHIN 250 FEET OF THE PROJECT SITE

Resource Number (P-37-)	Resource Number (CA-SDI-)	Age and Resources Present	Description	Recorder, Date
021191	---	Historic-era Building	The Frances Apartments	USD, 1980
021193	---	Historic-era Building	The Davies Motor Co.	USD, 1980
021195	---	Historic-era Building	Broadway Manor/St. Anthony Apartment Hotel	USD, 1980
021439	---	Historic-era Building	1037 15th Ave	Tinsley, 2001; USD, 1980
021440	---	Historic-era Building	1055 15th Ave	USD, 1980
021441	---	Historic-era Building	1065 15th Ave	USD, 1980
030181[1]	---	Historic-era Building	The Marks residence and associated artifacts	Alter, 2006; Robbins-Wade and Meriwether, 2010
031747[1]	---	Historic-era Building	The Aldrich Apartments and associated artifacts	Alter, 2006; Robbins-Wade et al., 2011
032128[1]	20360	Historic-era Site	Structural remains, historic artifacts	Meriwether et al., 2011
033557[1]	---	Historic-era Structure	Highway 395, constructed in the 1910s, and modified throughout the twentieth century	Tift, 2013; ASM, 2015; Chasteene, 2017; Foglia and Keckeisen, 2017; Stringer-Bowsher, 2018; ASM, 2021
035131	21739	Historic-era Site	Historic refuse deposit	Serr, 2015
037011	---	Historic-era Building	1425 and 1431 C Street	Crawford, 2015

Source: HELIX 2026a
[1] Overlaps project site.

P-37-030181

Recorded in 2006, P-37-030181 consists of the Stephen B. and Fannie Marks Residence, a Victorian Cottage built in 1893. At the time of recordation, the structure was evaluated for eligibility for inclusion on the California Register of Historic Resources (CRHR). It was determined that the structure was eligible for inclusion on the CRHR under Criterion C, as it was a rare example of a middle-class Victorian Cottage. In 2010, as part of the Marks Move-Off project, the residence was moved to a new location at 2644 Island Avenue. During the move, two features, a cistern and a brick wall, were encountered. Artifacts dating from the 1910s and 1920s were recovered from the cistern, including glass jars and bottles, ceramics, marbles, wood, and an automobile tire. Following documentation, the resource was destroyed.

P-37-031747

P-37-031747, recorded in 2006, consists of the Aldrich Apartment Building and Storefronts, a three-story, wood frame, rectangular commercial and multi-family residential building constructed in a Beaux Arts style. At the time of recordation, the building was evaluated for inclusion on the CRHR. Given that the building was not historically or architecturally significant, was not associated with important events or individuals, and did not embody the distinctive characteristics of a type, period, or method of construction, it was determined that the structure was not eligible for listing on the CRHR. As such, the research potential for the building was exhausted by recordation. The area containing the building was graded in 2011 as part of the City College General Purpose Classroom project, which included the existing Mathematics & Social Sciences building (Building MS) and adjacent parking structure. During the monitoring program implemented for this grading, artifacts dating between 1880 and 1930 were recovered from the area where the building had been located. A variety of glass bottles and bottle fragments, ceramic bottles and artifacts, a doorknob, ceramic insulators, and an electrical cleat were collected. Based on the assemblage, it was determined that the artifacts did not represent a significant archaeological resource, and the mitigation measures, consisting of the preparation of the report and curation of the artifacts, have been fulfilled.

P-37-032128 (CA-SDI-20360)

Recorded by Affinis in 2011 during monitoring for the City College Business and Humanities Building project, P-37-032128 (CA-SDI-20360) is comprised of a retaining wall parallel to 16th Street, a basement from a demolished building of unknown age, and a variety of historic artifacts. The retaining wall was constructed from concrete blocks and rebar, while the basement was located behind the retaining wall and was constructed from concrete blocks on a concrete slab. No artifacts were found within the basement but it was noted to have been filled with burned construction material, such as lumber and metal. A concentration of historic artifacts, mainly comprised of glass and ceramics, was observed behind the retaining wall and collected during the monitoring program.

P-37-033557 (Highway 395)

P-37-033557 is the historic-era alignment of Highway 395. By 1935, U.S. Highway 395 was part of a series of roads that connected communities in the U.S. from Mexico to Canada. The first route of what would become U.S. Highway 395 ran through Mission Valley, up Murphy Canyon, and into Poway as a wagon road in the late nineteenth century. In the first decades of the twentieth century, a survey to improve the road was conducted, and the route was extended from downtown San Diego at Broadway and 5th Street, up Murphy Canyon and east of Miramar to Bernardo. From there, it serviced northern

communities, such as Richland, San Marcos, Buena, Vista, and Bonsall. By 1935, the route had been altered first to follow modern-day India Street, and then to follow what would later become Park Boulevard. A major U.S. Highway 395 realignment between 1947 and 1950 was the predecessor route to Interstate (I-) 15, which consumed large portions of that alignment in the 1960s through 1980s. This realignment, completed downtown by 1948, began at Broadway and 10th Avenue, before following the current alignment of State Route (SR) 163.

Portions of Highway 395 (P-37-033557) have been recommended eligible for the National Register of Historic Places (NRHP) and CRHR under criterion A/1 due to its importance as a transportation corridor; however, only the segments of the highway with specific character defining features are eligible for listing. The character defining features include: road segments that follow the alignments from 1935 to 1968; two-lane, undivided highway; 24- to 30-foot roadbeds; where extant, original paving materials (such as concrete, gravel pavement, or asphalt); and historic viewshed or natural and cultural topography.

The 1935-1947 and 1948-1950 alignments of Highway 395 are mapped as being within the project site. While these segments follow the alignments from 1935 to 1968, they are not two-lane undivided highways, and neither the original paving materials nor historic viewshed are extant. Neither the 1935-1947 nor 1948-1950 alignments of the highway have been physically documented within or adjacent to the project site. As noted above, these segments of the highway followed Park Boulevard and 10th Avenue, respectively. As such, the segment of the highway recorded within the project site is mismapped and does not occur on campus.

Pedestrian Survey

A pedestrian survey of the project site was conducted on February 27, 2025, by HELIX staff archaeologist James Turner, with Kumeyaay Native American monitor Javier Dominguez from Red Tail Monitoring & Research. As most of the project site is heavily developed, the survey focused on areas of open ground and the sports fields on North Campus. Reconnaissance methodologies and transects spaced less than five meters apart were utilized in these areas, with the transects increasing in distance to approximately 10 meters apart in the sports fields. No archaeological resources were observed during the field survey.

3.4.1.6 Built Environment Resources

HELIX prepared a campus-wide historic context statement and conducted a historic resource survey of all buildings, structures, sites, objects, districts, and landscapes on the campus in 2025 for buildings and structures that were constructed through 1985. While the age threshold for listing of historic resources is typically 50 years, the scope of the survey included buildings and structures constructed through 1985 to provide a look-ahead at resources that may become eligible in the next 10 to 15 years. While this PEIR evaluates campus growth over a 20-year horizon, the historic resources survey focused on buildings and structures constructed through 1985 to avoid premature evaluation of more recent resources that do not yet have sufficient historical perspective for evaluation of such resources in historic context. As described in Section 3.4.1.4, six distinct contexts were identified for the campus, though these are not intended to be restrictive as a resource may be significant under multiple contexts and/or themes. For example, a particular resource may be significant as representing important trends in campus planning and design while also being an excellent example of a particular architectural style. In summary, one resource was determined eligible for listing in the CRHR and is therefore considered a historical resource for the purposes of CEQA: San Diego City College Campus Expansion Historic District.

San Diego City College Campus Expansion Historic District

The San Diego City College campus underwent a significant expansion in the 1970s. All of the buildings constructed between 1970 and 1977 were designed by Frank L. Hope & Associates. The San Diego City College Campus Expansion Historic District consists of five contributing buildings (Buildings C, D, L, and M, and Saville Theatre) and three contributing structures/plazas (Building C stairs/walkway, Curran Plaza, and Gorton Quad), which are summarized in Table 3.4-2, *Contributors to the San Diego City College Campus Expansion Historic District*. Three of the buildings added during the campus expansion period are no longer extant: the former Student Center (Building S), Child Development Center (Building F), and Evening Admin Building (Building E). The two original buildings from 1956 (Buildings A and T) are still extant, but predate the expansion period, have been significantly modified, and are therefore not contributing buildings. The Central Plant (Building U) was constructed to resemble the architectural style of surrounding buildings but was constructed in 2011, outside of the expansion period.

Table 3.4-2
CONTRIBUTORS TO THE SAN DIEGO CITY COLLEGE CAMPUS EXPANSION HISTORIC DISTRICT

Building Identifier	Year Constructed	Current Name	Style
L	1970	Academic Success Center	Brutalist in a Post-and-Beam form
C	1971	Creative Arts	Brutalist in a Post-and-Beam form
SAV	1971	Saville Theatre	Brutalist in a Post-and-Beam form
M	1976	Student Affairs	Brutalist in a Post-and-Beam form
D	1977	City Commons (altered)	Post-and-Beam expressed in Brutalist materials
-	1971	Pedestrian Steps/Walkway from C Street	N/A
-	1973	Curran Plaza	N/A
-	1977	Gorton Quad	N/A

Source: HELIX 2026b

Four of the five contributing buildings express a Brutalist style in a Post-and-Beam form. The final building (Building D) conveys more of a Post-and-Beam style expressed in Brutalist materials. Consistent with the key character-defining features of Brutalism, the Brutalist style buildings feature angular and rectangular forms with unpainted brick and exposed, smooth concrete dominating visible elevations. The buildings also have character-defining features of Post-and-Beam form, including horizontal massing, flat roofs with deep overhangs, floor-to-ceiling glass, repetitive façade geometry, and minimal use of solid load-bearing walls. Shared characteristics of both styles are demonstrated in the absence of applied decoration and the direct expression of the structural system (in the brick and concrete typical of Brutalism rather than the typical wood or steel frames expected of Post-and-Beam). The Post-and-Beam influence of horizontal massing in the one- and two-story buildings diminishes the monumental massing that characterizes many other Brutalist buildings. As a result of thoughtful design, the buildings taken together as a whole feature a unified design vocabulary and cohesive material finishes. Because of the combination of styles, the buildings express less organic and less monumental characteristics than is expected from stand-alone examples of either architectural style.

Curran Plaza, which is atop the B Street overpass, links the portions of campus north and south of B Street. Gorton Quad is accessed via the main campus pedestrian entrance walkway from Park Boulevard (formerly 12th Street) and is surrounded on three sides by Buildings M and D. The stairs and walkway

leading from C Street to Building C provide a main pedestrian entrance to the campus from the south. All three of these structures retain sufficient integrity to convey their historical character.

Lastly, the period of campus expansion was also a time of political, social, and cultural activism. Both students and faculty engaged in activities related to these themes on campus and elsewhere in the City. The District and City College made significant changes to course offerings, departments, degree programs, and facilities in response to the social and cultural movements of the time. The eligible historic district includes both interior and exterior learning and gathering buildings and spaces where these activities and academic changes occurred and were significant to the history of City College and the City. The historic district conveys the character and significance of City College during a major expansion period, which included political, social, and cultural activism and change, and represents a significant concentration and linkage of buildings and spaces united aesthetically by architectural design. Therefore, the San Diego City College Campus Expansion Historic District possesses local significance and is recommended eligible to be listed in the CRHR as a historic district under Criterion 1, Education and Social History, and under Criterion 3, Architecture. The period of significance is from 1970 to 1977.

Character-Defining Features

Character-defining features are the visual and physical qualities that give a building its distinctive identity and that relate it to an area or period of significance. These features may include the overall building shape, its materials, craftsmanship, decorative details and features, and aspects of its site and environment. For the San Diego City College Campus Expansion Historic District, the character-defining features are identified as:

- Five buildings and three structures
- Building arrangements, footprints, volumes, and heights
- Strong stylistic unity of Buildings C, D, L, M, and Saville Theatre that all express a Brutalist style in a Post-and-Beam form designed by master architect Frank L. Hope & Associates.
- Unified design vocabulary and cohesive material finishes
    - Brutalist details including angular and rectangular forms, unpainted brick and exposed, smooth concrete dominating visible elevations
    - Post-and-Beam details including horizontal massing, flat roofs with deep overhangs, floor-to-ceiling glass, repetitive façade geometry, and minimal use of solid load bearing walls
- Related structures – Curran Plaza, Gorton Quad, and the pedestrian stairs and walkway from C Street

3.4.2 Regulatory Framework

A summary of federal, state, and local regulations that pertain to cultural resources is provided below. No regional or District regulations regarding cultural resources apply to the project.

3.4.2.1 Federal

National Historic Preservation Act of 1966

The National Historic Preservation Act (NHPA) of 1966 (16 United States Code [USC] 470), declared a national policy of historic preservation and instituted a multifaceted program, administered by the Secretary of the Interior, to encourage the achievement of preservation goals at the federal, state, and local levels. The NHPA authorized the creation of the NRHP, established the position of State Historic Preservation Officer and provided for the designation of State Review Boards, set up a mechanism to certify local governments to carry out the purposes of the NHPA, assisted Native American tribes in preserving their cultural heritage, and created the Advisory Council on Historic Preservation.

Section 106

Section 106 of the NHPA states that federal agencies with direct or indirect jurisdiction over federally funded, assisted, or licensed undertakings must take into account the effect of the undertaking on any historic property that is included in or eligible for inclusion in the NRHP and that the Advisory Council on Historic Preservation must be afforded an opportunity to comment on such undertakings through a process outlined in 36 Code of Federal Regulations (CFR) Part 800. The Section 106 process involves the identification of historic properties within the area of potential effect, the determination of whether the undertaking will cause an adverse effect on historic properties, and the resolution of those adverse effects through consultation with parties to the Section 106 review process, most prominently including the California State Historic Preservation Officer and Native American tribes.

National Register of Historic Places

The NRHP was established by the NHPA as "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (36 CFR Part 60.2). The NRHP is the official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture. Properties can be significant at the local, state, or national level. To qualify for listing in the NRHP, properties generally must be at least 50 years old, possess historic significance, and retain physical integrity. To be eligible for listing in the NRHP, a property must be considered significant under one or more of the NRHP criteria, which include:

- Criterion A: associated with events that have made a significant contribution to the broad patterns of our history;
- Criterion B: associated with the lives of persons significant in our past;
- Criterion C: embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; and/or
- Criterion D: has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting these criteria, a property must retain historic integrity, which is defined as the "ability of a property to convey its significance." To assess integrity, the National Park Service recognizes

seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities:

1) Location – the place where the historic property was constructed or the place where the historic event occurred;

2) Design – the combination of elements that create the form, plan, space, structure, and style of a property;

3) Setting – the physical environment of a historic property;

4) Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property;

5) Workmanship – the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;

6) Feeling – a property's expression of the aesthetic or historic sense of a particular period of time; and

7) Association – the direct link between an important historic event or person and a historic property.

3.4.2.2 State

California Environmental Quality Act

The CEQA Guidelines (Section 15064.5) address determining the significance of impacts to archaeological and historic resources. Cultural resources are defined as buildings, sites, structures, or objects, each of which may have historical, architectural, archaeological, cultural, and/or scientific importance (California Office of Historic Preservation 1995). Significant resources are designated as "historical resources," and are defined per PRC Section 21084.1 and CEQA Guidelines Section 15064.5 as follows:

- Resource(s) listed or determined eligible by the State Historical Resources Commission for listing in the CRHR (CEQA Guidelines Section 15064.5[a][1]);

- Resource(s) either listed in the NRHP or in a "local register of historical resources" or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the PRC, unless "the preponderance of evidence demonstrates that it is not historically or culturally significant" (CEQA Guidelines Section 15064.5[a][2]); or

- Resources determined by the Lead Agency to meet the Criteria for listing on the CRHR (CEQA Guidelines Section 15064.5[a][3]).

It is important to note under CEQA Guidelines Section 15064.5(a)(4), a resource may also be considered an "historical resource" for the purposes of CEQA at the discretion of the lead agency, despite ineligibility recommendations.

For listing in the CRHR, a historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2) It is associated with the lives of persons important to local, California, or national history;

3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values;

4) It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation.

All resources nominated for listing must have integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. A resource must also be judged with reference to the particular criteria under which it is proposed for nomination.

California Register of Historic Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). Certain properties, including those listed in or formally determined eligible for listing in the NRHP, and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historic resources surveys, or designated by local landmarks programs may be nominated for inclusion in the CRHR.

A resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled after the NRHP criteria:

- Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

- Criterion 2: It is associated with the lives of persons important to local, California, or national history;

- Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; and/or

- Criterion 4: It has yielded or has the potential to yield information important to the prehistory or history of the local area, California, or the nation (PRC Section 5024.1[c]).

Under CEQA Guidelines Section 15064.5(a)(4), a resource may also be considered a "historical resource" for the purposes of CEQA at the discretion of the lead agency.

Significant resources must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Resource integrity, which is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance, is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. In an archaeological deposit, integrity is assessed with reference to the preservation of material constituents and their culturally and historically meaningful spatial relationships. A resource must also be judged with reference to the particular CRHR/NRHP criteria under which it is proposed for eligibility.

3.4.2.3 Local (Non-Regulatory)

Pursuant to Government Code Section 53094, local City zoning and development regulations are not applicable to FMP development as implementation of the FMP would facilitate the education of community college students. While not subject to local regulations of the City, the District may consider aspects of local plans and policies for the communities surrounding the campus when it is appropriate and feasible. Relative to historical resources, City regulations regarding the evaluation, designation, and preservation of historical resources do not apply to FMP development undertaken by the District. However, localized guidance from the City relative to identification and evaluation of such resources provides relevant guidance for the District in the absence of campus-specific guidelines for identification of locally significant historic resources. As such, the City's Historical Resources Regulations and related guidance are summarized below.

San Diego Historical Resources Regulations

The purpose of the City's Historical Resources Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures, historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of historical resources. It is further the intent of these regulations to protect the educational, cultural, economic, and general welfare of the public, while employing regulations that are consistent with sound historical preservation principles, and the rights of private property owners. For development projects regulated by the City, these regulations apply to proposed development when the following historical resources are present on the site: designated historical resources, historical buildings, historical districts, historical landscapes, historical objects, historical structures, important archaeological sites, and traditional cultural properties.

City of San Diego Historical Resource Guidelines

The purpose and intent of the City's Historical Resources Guidelines, located in the City's Land Development Manual, are to protect, preserve, and, where damaged, restore the historical resources of San Diego. These guidelines are designed to implement the City's Historical Resources Regulations in compliance with applicable local, state, and federal policies and mandates, including, but not limited to, the City's General Plan, CEQA, and Section 106 of the NHPA. The intent of the Historical Resources Guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation, and development. The Historical Resources

Guidelines state that if a project will potentially impact a resource 45 years or older, the resource's significance must be determined, even if it is not listed in or previously considered eligible for the CRHR or a local register (Land Development Manual Section II.D.5).

To be designated as historic and potentially listed in the San Diego Register of Historic Resources, one or more of the following criteria must be met:

A. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;

B. Is identified with persons or events significant in local, state, or national history;

C. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;

D. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;

E. Is listed, or has been determined eligible by the National Park Service for listing on the NRHP, or is listed or has been determined eligible by the California State Office of Historic Preservation for listing on the CRHR; and/or

F. Is a finite group of resources related to one another in a clearly distinguishable way, or is a geographically definable area or neighborhood, containing improvements that have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

In addition to meeting one or more of the above criteria, a San Diego Register of Historic Resources-eligible resource must also retain sufficient integrity to convey its significance. Although the San Diego Municipal Code uses a 45-year threshold to review resources that may be adversely affected by development, a resource need not be 45 years of age to be eligible for listing on the San Diego Register of Historic Resources.

Eligible resources, which may include an improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object, are designated to the San Diego Register of Historic Resources by the City's Historical Resources Board at a publicly noticed hearing.

City of San Diego Historic Districts

The City's historic preservation program provides for the designation of individually significant resources as well as historic districts (Land Development Manual Section II.D.5). A historic district is defined by the San Diego Municipal Code as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects that are united historically, geographically, or aesthetically by plan or physical development and that have a special character, historical interest, cultural or aesthetic value, or that represent one or more architectural periods or styles in the history and development of the City" (San Diego Municipal Code Section 113.0103).

3.4.3 Thresholds of Significance

Thresholds used to evaluate potential cultural resources impacts are based on CEQA Guidelines Appendix G. A significant cultural resources impact could occur if implementation of the proposed project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

3. Disturb any human remains, including those interred outside of formal cemeteries.

While historical resources are broadly defined under CEQA Guidelines Section 15064.5 to include multiple resource types, for clarity of this impact analysis, built environment historical resources are addressed under Threshold 1 in Section 3.4.4.1 and archaeological historical resources are addressed under Threshold 2 in Section 3.4.4.2. Tribal cultural resources, which can also be considered historical resources under CEQA, are addressed in Section 3.16, *Tribal Cultural Resources*.

3.4.4 Impact Analysis

3.4.4.1 Historic Resources

Threshold 1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact Discussion

Program-Level

As described above in Section 3.4.1.6, the San Diego City College Campus Expansion Historic District is considered a historical resource under CEQA. As such, alteration, demolition, or incompatible development involving the buildings and structures in the historic district could result in substantial adverse changes to a historical resource. Changes to other campus buildings or features that have not been identified as eligible as historic resources or contributors to this historic district would not result in a direct, adverse change to the significance of historical resources. However, new construction or renovation projects adjacent to a historic resource could also indirectly affect their integrity by altering their setting, feeling, and/or association.

Projects implemented under the FMP with potential to affect historic resources would generally fall into one of three categories: (1) minor alterations, (2) alterations to character-defining features, or (3) new construction adjacent to historical resources. The following evaluates these three categories by determining the potential for each type of activity to affect the integrity and character-defining features of historical resources.

This analysis is based on a review of campus buildings and structures constructed prior to 1985, which have sufficient historical perspective to allow for evaluation of potential significance under CEQA. Buildings and structures constructed after 1985 were not evaluated to avoid premature determinations

of historical significance. The identification and evaluation of buildings and structures that age into potential eligibility during the 20-year planning horizon would occur as part of the future, project-specific CEQA review. At the time individual campus projects are proposed, buildings and structures that have reached 45 years of age would be evaluated for potential historical significance consistent with CEQA Guidelines Section 15064.5 and applicable professional standards.

Minor Alterations

Projects involving routine maintenance, minor system upgrades, changes to secondary spaces (i.e. restrooms or storage spaces), or changes to spaces that as an existing condition contain no character-defining features are assumed not to result in adverse changes to the character-defining features of a historical resource.

Alterations to Character-Defining Features

A project that requires either extensive alteration (such that the resource would no longer convey its historic significance) or demolition of a historic resource would result in a substantial adverse change to that resource. Such projects may also include renovation activities that require alterations involving character-defining features, result in a change of use, or are additions that may be incompatible with the resource. These project types have the potential to directly alter the significance of a historical resource.

Projects Adjacent to a Historical Resource

New construction adjacent to a historical resource also has the potential to indirectly affect a historical resource if such new construction is incompatible with the historical resource in terms of bulk, scale, massing, height, and/or style such that the setting, feeling, and/or association of the historical resource is impaired. Implementation of projects adjacent to the historic district or its contributing resources have the potential to indirectly alter the significance of a historical resource.

Project-Level

Building A Expansion

The Building A Expansion project would replace the existing Building D, which contains the campus bookstore and dining facilities adjacent to Gorton Quad, with a new building that would be approximately 110,000 gross square feet (GSF), or approximately 3.5 times larger than the existing Building D. The new addition would be coordinated with the existing Building A facilities, similar to the existing integration with Building D. As the existing Building D and surrounding Gorton Quad are contributing resources to the San Diego City College Campus Expansion Historic District that is recommended eligible for CRHR listing, demolition or other alterations to these existing resources would be considered substantial adverse changes to a historical resource. As the Building A Expansion project would involve the demolition of Building D and reconfiguration of Gorton Quad, it would be categorized as a project that alters character-defining features of a historical resource.

Performing Arts Center

Saville Theatre is proposed to be demolished and replaced with an expanded (approximate doubling of building area) and upgraded building including theater space and new dance and music rooms. As the

existing Saville Theatre is a contributing resource to the San Diego City College Campus Expansion Historic District that is recommended eligible for CRHR listing, demolition or other alterations would result in a substantial adverse change to a historical resource. This project would be categorized as a project that alters character-defining features of a historical resource.

North Campus Athletic Fields

Near-term improvements to athletic facilities on North Campus would include the addition of sand volleyball facilities and renovations of existing softball and soccer fields, including new support buildings. The fields and associated facilities within North Campus were not identified as historical resources and do not contribute to the eligible San Diego City College Campus Expansion Historic District. Further, this area is separated from such resources by Park Boulevard and would not result in indirect effects. Therefore, the North Campus Athletic Fields project does not have the potential to result in a substantial adverse change to a historical resource.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP has the potential to cause a substantial adverse change in the significance of a historical resource directly through alterations to character defining features or indirectly via construction adjacent to a historical resource. **Program-level impacts would be significant prior to mitigation**.

Project-Level

Building A Expansion

Implementation of the Building A Expansion project has the potential to cause a substantial adverse change in the significance of a historical resource directly through the demolition of the existing Building D and other alteration to the surrounding Gorton Quad. **Building A Expansion project impacts would be significant prior to mitigation**.

Performing Arts Center

Implementation of the Performing Arts Center project has the potential to cause a substantial adverse change in the significance of a historical resource through the demolition of the existing Saville Theatre. **Performing Arts Center project impacts would be significant prior to mitigation**.

North Campus Athletic Fields

The North Campus Athletic Fields project would not cause a substantial adverse change in the significance of a historical resource. **No impact would occur at the project level**. No mitigation is required.

Mitigation Measures

Program-Level

To mitigate future potential adverse impacts to historical resources located on the City College campus, the following mitigation measures apply to proposed alterations, additions, demolitions, and/or construction involving any of these resources: Creative Arts (Building C), Saville Theatre, City Commons (Building D), Academic Success Center (Building L), and Student Affairs (Building M); Gorton Quad; the pedestrian stairs and walkway leading to Building C; and Curran Plaza. This includes projects that require the temporary removal of character-defining features, for which District should ensure the safe removal, storage, and reinstallation of the feature(s).

CUL-1 Project-level Historic Properties Project Impacts Analysis. During initial project planning for projects that may result in changes to a historical resource, including but not limited to the Creative Arts (Building C), Saville Theatre, City Commons (Building D), Academic Success Center (Building L), and Student Affairs (Building M) buildings; Gorton Quad; the pedestrian stairs and walkway leading to Building C; and Curran Plaza, the project plans shall be reviewed by a qualified architectural historian (meeting the Secretary of the Interior's Professional Qualifications Standards for Architectural History) for the potential to affect character-defining features of that resource as defined in Section 6.2.1.1 of the Historic Resources Survey Report. If the architectural historian determines that the minor changes to an eligible historic resource would result in no permanent changes to the character-defining features of the resource, no further analysis or mitigation measures are required for minor renovation projects.

For projects that may involve altering character-defining features, either directly or indirectly, a Project Impacts Analysis shall be prepared by a qualified architectural historian during the project design phase to identify potential direct and indirect impacts, as defined by CEQA, utilizing the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). If the Project Impacts Analysis concludes that the project meets the Standards, no further analysis or mitigation measures are required.

If the Project Impacts Analysis concludes that the project, as designed, does not comply with the Standards, it shall be further reviewed by the same qualified architectural historian to determine if the resource would retain its overall eligibility as a historical resource, even if the project does not strictly comply with the Standards. Examples of such projects might include changes to major interior spaces that require the loss or removal of important character-defining features, or large building additions that alter a secondary façade.

The District shall also evaluate if the project can be redesigned to meet the Standards. If such project changes are determined by the District to be feasible, changes shall be incorporated into the project to the satisfaction of the qualified architectural historian and documented in the Project Impacts Analysis or a subsequent memorandum. If such changes are incorporated and the project complies with the Standards, no further analysis or mitigation measures are required.

If the project cannot be redesigned to meet the Standards, the District shall implement mitigation measure CUL-2 to document the resource and shall consider the feasibility of mitigation measures CUL-3 and CUL-4 for the project.

CUL-2 HABS or HALS Documentation for Historic Resources. The District shall commission the preparation of Historic American Buildings Survey (HABS) or Historic American Landscapes Survey (HALS) Level II documentation by a qualified architectural historian for any historical resource that would be impacted by the project. Documentation of the existing conditions shall be undertaken prior to the commencement of construction in accordance with the Level II documentation procedures. Level II documentation shall include select existing drawings, photographs, and a written history and resource description. The HABS or HALS documentation shall be submitted to the City College campus archive and to the San Diego History Center and/or to the SCIC at San Diego State University, which is the CHRIS Information Center for San Diego County.

CUL-3 Relocation of a Historical Resource. If a project would result in the unavoidable demolition or removal of a historical resource, then the District, in consultation with a qualified architectural historian, shall consider relocating the resource to an appropriate receiver site, if any such site is available, and relocation is feasible (i.e., buildings and structures of a suitable size). The receiver site shall constitute an appropriate historic setting for the relocated historical resource(s) as determined by a qualified architectural historian. For historic district contributors, the receiver site shall fall within the historic district boundaries to retain the associative qualities between the contributor and the historic district within which it is located.

CUL-4 Interpretation/Commemoration of a Historical Resource. If a project would substantially alter a historical resource, then the District, in consultation with a qualified architectural historian, shall prepare interpretive and/or commemorative materials of the building or structure. Interpretive displays in the public areas of significant buildings, landscapes, and sites shall be installed as deemed appropriate and feasible by the District.

Project-Level

Building A Expansion

The Building A Expansion project would result in demolition of a contributing building to a historic resource and would conflict with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, mitigation measure CUL-2 would apply and the District would consider the feasibility of additional mitigation measures CUL-3 and CUL-4.

Performing Arts Center

The Performing Arts Center project would result in demolition of a contributing building to a historic resource and would conflict with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, mitigation measure CUL-2 would apply and the District would consider the feasibility of additional mitigation measures CUL-3 and CUL-4.

Level of Significance After Mitigation

Program-Level

Mitigation measures CUL-1 through CUL-4 would reduce potential impacts on historic resources to the extent feasible; however, impacts would remain significant after mitigation for future projects that do not comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties as

determined under mitigation measure CUL-1. As defined in CEQA Guidelines Section 15126.4(b)(2), "in some circumstances, documentation of a historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur." However, documentation of a historical resource through these methods can still serve to reduce the effect of the demolition of the resource, even though it does not mitigate the effects to the point where clearly no significant effect on the environment would occur. As CEQA requires that all feasible mitigation be undertaken even if it does not mitigate below a level of significance and "[i]n this context, recordation serves a legitimate archival purpose" (California Office of Historic Preservation 1999). Therefore, while mitigation measures CUL-1 through CUL-4 would reduce potential impacts on historic resources to the extent feasible, **program-level impacts would remain significant and unavoidable**.

Project-Level

Building A Expansion

Even with the implementation of all feasible mitigation measures, the **Building A Expansion project impacts would remain significant and unavoidable**.

Performing Arts Center

Even with the implementation of all feasible mitigation measures, the **Performing Arts Center impacts would remain significant and unavoidable**.

3.4.4.2 Archaeological Resources

Threshold 2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact Discussion

Program-Level

As described above in Section 3.4.1.5, 12 archaeological resources have been previously recorded within or within 250 feet of the project site, though no additional archaeological resources were identified within the project site during the field survey. The recorded resources within the project site were noted to consist of artifacts dating to the late nineteenth and early twentieth centuries, before they were destroyed during prior campus construction work. These archaeological resources (P-37-030181, P37-031747, and P 37-032128) were recommended not eligible to be listed on the CRHR and therefore not considered significant under CEQA during their discovery and recordation. Therefore, no archaeological resources within the project site were identified as historical resources per CEQA Guidelines Section 15064.5, and implementation of the FMP would not result in an effect to known archaeological resources.

However, given the presence of archaeological resources within the project vicinity and the development history of the project area, with most of the buildings being constructed in the latter half of the twentieth century, there is the potential for subsurface deposits to be present below existing buildings. Therefore, an archaeological sensitivity analysis was performed for the project site and the project site was classified as having a low or moderate sensitivity for cultural resources as shown on

Figure 3.4-1, *Archaeological Resource Sensitivity*. In general, areas that have been disturbed by the construction of new buildings or parking lots over the last 50 years have been categorized as low sensitivity while areas containing original campus buildings or areas that have not undergone extensive grading have been designated as moderate sensitivity.

It is unlikely that there would be an inadvertent discovery of archaeological resources during ground disturbance in the areas with a low sensitivity for cultural resources. Therefore, projects constructed within the low sensitivity areas mapped in Figure 3.4-1 would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Due to dense vegetation or hardscaping causing poor ground surface visibility during the survey, the alluvial nature of the project area, historic uses of the project site, and previous historic-era archaeological discoveries within the site, approximately half of the project site has been designated as having a moderate sensitivity for archaeological resources (refer to Figure 3.4-1). Ground-disturbing activities associated with the implementation of the FMP within the moderate sensitivity areas that require clearing, trenching, and/or grading, have the potential to damage or destroy archaeological resources that may be present on or below the ground surface. Adverse effects to significant or unique archaeological resources may result in a loss of valuable information that could be gained from the resources or prevent potentially eligible sites from being listed on a register of cultural resources. As such, projects requiring ground disturbance in moderate sensitivity areas could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines.

Project-Level

Building A Expansion

The Building A Expansion project would occur within low and moderate sensitivity areas (Figure 3.4-1) for archaeological resources, with the moderate sensitivity area underlying existing Building D that would be demolished. Therefore, ground-disturbing activities (such as clearing, grading, or trenching) associated with this project have the potential to cause an adverse change in the significance of archaeological resources which may be present on or below the ground surface.

Performing Arts Center

The Performing Arts Center project would be constructed in a low sensitivity area (Figure 3.4-1) for archaeological resources. As such, this near-term project, requiring ground disturbance only in a low sensitivity area, would not cause a substantial adverse change in the significance of an archaeological resource.

North Campus Athletic Fields

Portions of the North Campus Fields project affecting the softball and soccer fields would occur in moderate sensitivity areas (Figure 3.4-1) for archaeological resources, with improvements to the upper parking and tennis areas occurring in low sensitivity areas. Therefore, ground-disturbing activities (such as clearing, grading, or trenching) have the potential to cause an adverse change in the significance of archaeological resources which may be present on or below the ground surface in areas with a moderate sensitivity.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP has the potential to cause a substantial adverse change in the significance of archaeological resources due to ground disturbing activities for projects within moderate sensitivity areas. **Program-level impacts would be significant prior to mitigation**.

Project-Level

Building A Expansion

The Building A Expansion project's ground disturbing activities in moderate sensitivity areas have the potential to cause a substantial adverse change in the significance of archaeological resources. **Building A Expansion project impacts would be significant prior to mitigation**.

Performing Arts Center

The Performing Arts Center project's ground disturbing activities in low sensitivity area do not have the potential to cause a substantial adverse change in the significance of archaeological resources. **Performing Arts Center project impacts would be less than significant.** No mitigation is required for this project.

North Campus Athletic Fields

The North Campus Athletic Fields project's ground disturbing activities in moderate sensitivity area have the potential cause a substantial adverse change in the significance of archaeological resources. **North Campus Athletic Fields project impacts would be significant prior to mitigation.**

Mitigation Measures

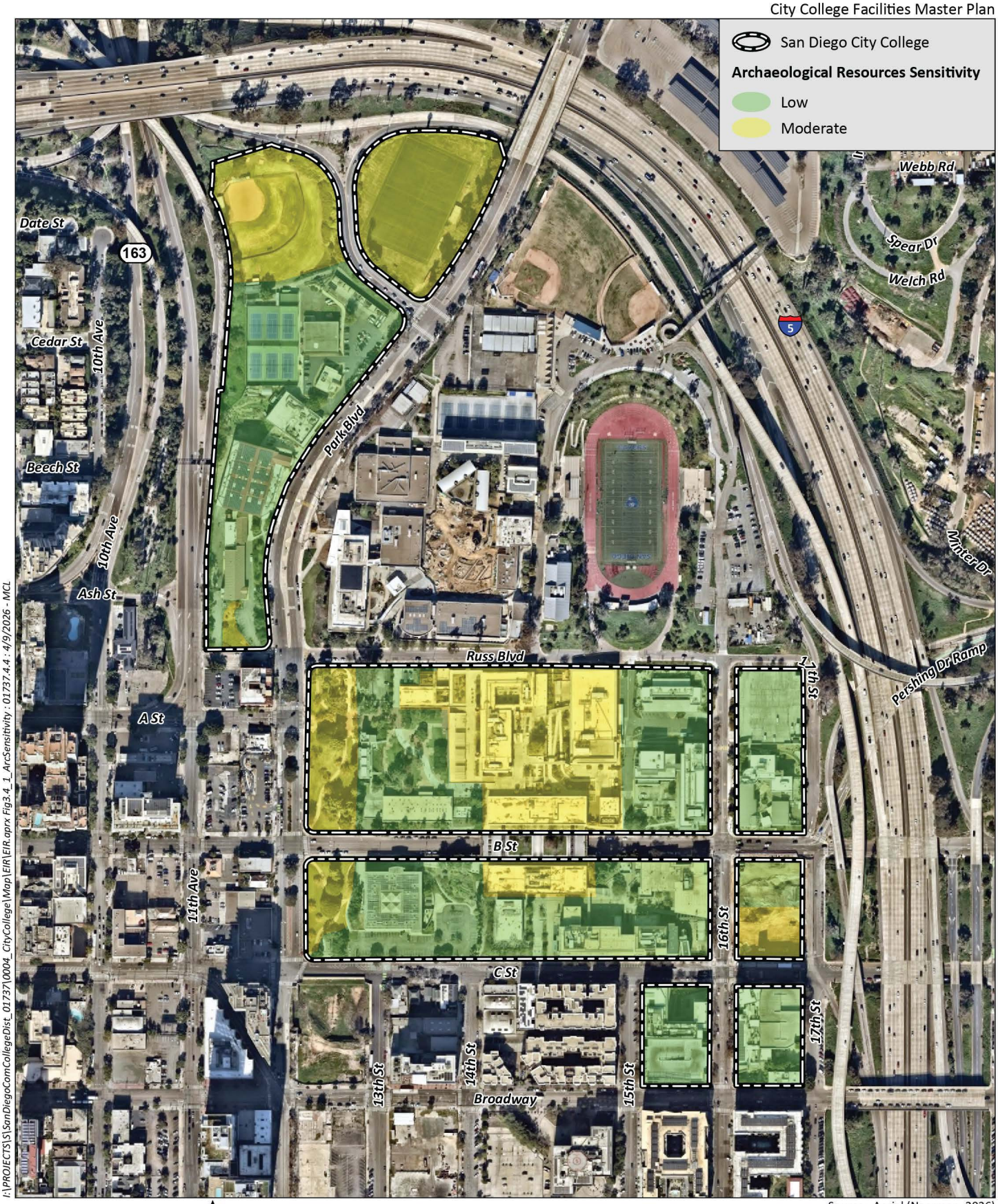
Program-Level

CUL-5 Cultural Resources Monitoring Program. If ground disturbance is proposed within a moderate sensitivity area (PEIR Figure 3.4-1), a cultural resources monitoring program shall be implemented.

1) The District shall retain a qualified Project archaeologist and Native American monitor associated with a tribe that is traditionally and culturally affiliated (TCA) with the project area ("TCA Tribe") to implement the monitoring program, as described below. The qualified Project archaeologist shall meet the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-39).

2) The qualified Project archaeologist and a Native American monitor shall attend the pre-grading meeting with the grading contractors to explain and coordinate the requirements of the monitoring program.

3) The monitoring program shall require that during the initial grubbing, site grading, excavation, trenching, or disturbance of the ground surface, an archaeological monitor, overseen by the qualified Project archaeologist, and a Native American monitor shall be



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Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Archaeological Resource Sensitivity

Figure 3.4-1

on site full-time. The frequency of inspections shall depend on the rate of excavation, the materials excavated, and discoveries of archaeological resources or of tribal cultural resources as defined in California PRC Section 21074. Archaeological and Native American monitoring may be discontinued when the depth of grading or soil conditions no longer retain the potential to contain cultural deposits. The qualified Project archaeologist, in consultation with the Native American representative, shall be responsible for determining the duration and frequency of monitoring.

4) If unevaluated potentially significant cultural resources are discovered, construction activities shall be diverted away from the discovery until significance evaluation can be conducted and the appropriate preservation or treatment actions can be taken. All cultural material collected during monitoring and appropriate for curation shall be processed and curated at a San Diego County facility that meets federal standards per 36 CFR Part 79 unless, in the case of Native American cultural material, other appropriate treatment measures such as the reburial of recovered cultural material are agreed upon by the District and the TCA Tribe.

5) After the completion of monitoring, an appropriate report summarizing the monitoring program shall be prepared. If no significant cultural resources are discovered, a brief letter shall be prepared and submitted to the District and the SCIC. If significant cultural resources are discovered, a technical report with the results of the monitoring and data recovery or treatment (including the interpretation of the data within the research context), as applicable, shall be prepared and submitted to the District and SCIC.

Project-Level

Building A Expansion

Mitigation measure CUL-5 would apply to construction of the near-term Building A Expansion project occurring in moderate sensitivity areas.

North Campus Athletic Fields

Mitigation measure CUL-5 would apply to construction of the near-term North Campus Athletic Fields project occurring moderate sensitivity areas.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measure CUL-5 would reduce program-level impacts to archaeological resources to a level that is **less than significant**.

Project-Level

Building A Expansion

Implementation of mitigation measure CUL-5 would reduce project-level impacts to archaeological resources to a level that is **less than significant**.

North Campus Athletic Fields

Implementation of mitigation measure CUL-5 would reduce project-level impacts to archaeological resources to a level that is **less than significant**.

3.4.4.3 Human Remains

Threshold 3: Would the project disturb any human remains, including those interred outside of formal cemeteries pursuant to Section 15064.5?

Impact Discussion

Program-Level

Human burials have occurred outside of formal cemeteries within the County, usually associated with prehistoric or precontact archaeological resource sites. As such, while low, the potential exists for unknown burials to be present within the project area, and ground-disturbing activities associated with the implementation of the project could have the potential to disturb human remains.

Project-Level

The near-term projects would occur in low and moderate sensitivity areas for archaeological resources. While human remains are typically associated with archaeological resource sites and are therefore not anticipated to be disturbed during construction of the near-term projects, especially in low archaeological sensitivity areas, the potential exists for unknown burials to be present within the project sites. Therefore, ground-disturbing activities have the potential to unintentionally disturb human remains.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, has the potential to disturb human remains due to ground disturbing activities. **Program-level and project-level impacts would be significant prior to mitigation.**

Mitigation Measures

Program-Level

CUL-6 Procedure for Inadvertent Discovery of Human Remains. As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or their authorized representative, shall immediately notify the San Diego County Medical Examiner's office. Determination of whether the remains are human shall be conducted by a forensic anthropologist on-site and in situ where they were discovered, unless the forensic anthropologist and the Native American representative agree to remove the remains to an off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner's office has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would

be protected, and consultation and treatment could occur as prescribed by law. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains in accordance with California PRC Section 5097.98. The Native American remains shall be kept in situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor.

Project-Level

Mitigation measure CUL-6 would apply to the construction of the near-term projects proposed under the FMP.

Level of Significance After Mitigation

Implementation of mitigation measures CUL-6 would reduce program-level and project-level impacts to human remains to a level that is **less than significant**.

3.4.5 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to cultural resources is the San Diego County region as cumulative projects in the County have the potential to result in cumulative losses of historical and/or archaeological resources contributing to the historic context of the County.

3.4.5.1 Historic Resources

Cumulative projects could involve the physical demolition, destruction, relocation, or alteration of eligible historical resources or their immediate surroundings. These projects would be subject to applicable federal, state, and local regulations; however, even with regulatory compliance, individual historical resources still could be affected or degraded as a result of new development or redevelopment associated with cumulative projects. Therefore, a significant cumulative impact could occur related to the loss of historic resources in the San Diego region. For projects under the FMP, although mitigation measures CUL-1 through CUL-4 would be applied, impacts would remain significant and unavoidable after mitigation for future projects that do not comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Therefore, the project's contribution to the significant cumulative historic resources impact **would be cumulatively considerable**.

3.4.5.2 Archaeological Resources

Cumulative projects could involve ground disturbing activities which have the potential to disturb archaeological resources. These projects would be subject to applicable federal, state, and local regulations; however, even with regulatory compliance, the loss of archaeological resources on a regional level may not be adequately mitigated through compliance with these regulations. Therefore, a significant cumulative impact associated with archaeological resources would occur. However, for projects under the FMP, the implementation of mitigation measure CUL-5 would reduce impacts to archaeological resources to a less than significant level. Therefore, the project's contribution to the significant cumulative archaeological resources impact **would not be cumulatively considerable**.

3.4.5.3 Human Remains

As discussed in Section 3.4.4.3, human burials have occurred outside of formal cemeteries within the County. Therefore, the potential exists for unknown burials to be present throughout the County where cumulative projects could require excavation at depths that could potentially expose or damage human remains. However, these projects would be required to comply with California Health and Safety Code Section 7050.5 and California PRC Section 5097.98, which outline applicable protocols for the accidental discovery of human remains during construction activities, similar to the procedure outlined for the FMP projects in mitigation measure CUL-6. With the implementation of similar mitigation measures and adherence to state regulations, cumulative impacts to human remains would be **less than significant**.

3.5 Energy

This section addresses the potential energy impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to energy are also addressed.

3.5.1 Environmental Setting

3.5.1.1 Existing Energy Consumption and Generation

Units of Measure

The units of energy used in this section are the British thermal units (BTU), kilowatt hour (kWh), therms, and gallons. A BTU is the quantity of heat required to raise the temperature of one pound of water one degree Fahrenheit (°F) at sea level. A kWh is a unit of electrical energy, and one kWh is equivalent to approximately 3,413 BTU, taking into account initial conversion losses (i.e., from one type of energy, such as chemical, to another type of energy, such as mechanical) and transmission losses. Natural gas consumption is described typically in terms of cubic feet or therms; one cubic foot of natural gas is equivalent to approximately 1,050 BTU, and one therm represents 100,000 BTU. One gallon of gasoline/diesel is equivalent to approximately 125,000/139,000 BTU, respectively, taking into account energy consumed in the refining process.

Electricity

State and Regional

According to the U.S. Energy Information Administration (EIA), California used approximately 245,717,145 megawatt hours (MWh) of electricity in 2024 (EIA 2025a). Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building.

San Diego Gas & Electric (SDG&E) provides electric service to 3.7 million customers across a 4,100-square-mile service area that includes San Diego County (County) and southern Orange County (SDG&E 2025a). SDG&E provides electricity to the campus and would continue to do so for the proposed project. According to SDG&E, its customers consumed approximately 4.4 billion kWh of electricity in 2025 (SDG&E 2025b).

SDG&E receives electric power from a variety of sources. According to the California Public Utilities Commission's (CPUC's) 2024 California Renewables Portfolio Standard Annual Report, 48 percent of SDG&E's power came from eligible renewable energy sources in 2023, including biomass/waste, geothermal, small hydroelectric, solar, and wind sources (CPUC 2024). Baseline electricity consumption is forecasted to grow at a rate of approximately 1.7 percent annually through 2040 in California (California Energy Commission [CEC] 2024a).

City College

City College currently receives electricity from SDG&E, in addition to a 650-kilowatt hydrogen fuel cell grid located on the City College campus between Building A and Russ Boulevard and solar photovoltaic (PV) panels rated approximately one-megawatt (MW; District 2023). Electricity on the City College

campus is utilized for interior and exterior lighting, heating, ventilation, and air conditioning (HVAC) systems, computer and office equipment, refrigeration and cooking equipment in dining facilities, electric vehicle (EV) charging stations, and additional building operations such as security systems and elevators. According to energy bills for the period of March 2024 to February 2025, the yearly electricity consumption on the campus was approximately 8.5 million kWh. The District is in the process of installing a linear generator on campus to provide electrical load flexibility.

Natural Gas

State and Regional

According to the EIA, California used approximately 1,938,982 million cubic feet of natural gas in 2024 (EIA 2026). CPUC regulates natural gas utility service for approximately 10.8 million customers who receive natural gas from Pacific Gas & Electric (PG&E), Southern California Gas (SoCalGas), SDG&E, Southwest Gas, and several smaller natural gas utilities or independent storage operators (CPUC 2026a). SDG&E provides natural gas service to the counties of San Diego and Orange, including the City College campus. SDG&E is a wholesale customer of SoCalGas and currently receives all of its natural gas from the SoCalGas system (CPUC 2026b).

The majority of natural gas used in California is sourced from out-of-state natural gas basins. The state does not receive liquefied natural gas supplies. Biogas, including gas from wastewater treatment plants and dairy farms, has recently begun to be used, and the state has been encouraging its development and expansion. Natural gas from out-of-state production basins is delivered to California via the interstate natural gas pipeline system. This gas is then delivered from SoCalGas and PG&E via the statewide network to local transmission and distribution pipelines, or local storage fields (CPUC 2026b).

Statewide natural gas demand is expected to decrease at an annual average rate of 1.1 percent through 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, and SB 350 goals to decrease the use of non-renewable energy sources such as natural gas. Other factors that contribute to the downward trend are tighter standards created by revised Title 24 codes and standards, renewable electricity goals, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (California Gas and Electric Utilities 2022).

City College

City College currently receives natural gas from SDG&E. Natural gas is currently used on campus for the heating of buildings and water, other mechanical processes, and in laboratories. According to energy bills for the period of March 2024 to February 2025, the yearly natural gas consumption on the campus was approximately 17.9 million kilo British Thermal Units (kBTU).

Petroleum

State and Regional

According to the EIA, California used approximately 649 million barrels of petroleum in 2023, with the majority (555 million barrels) used for the transportation sector (EIA 2025b). This total annual consumption equates to a daily use of approximately 1.8 million barrels of petroleum. There are 42 U.S.

gallons in a barrel; therefore, California consumes approximately 76 million gallons of petroleum per day and 26 billion gallons of petroleum annually.

Petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel (diesel fuel and fuel oils), liquefied petroleum gases, and jet fuel. In 2024, it was estimated that retail gasoline sales in San Diego County totaled 1.1 billion gallons annually, which was the third highest amount consumed among counties in California behind Los Angeles County (3 billion gallons) and Orange County (1.15 billion gallons; CEC 2024b). The retail sales of diesel fuel in 2024 were estimated to be 113 million gallons in 2024 in San Diego County, which ranked as the sixth largest consumer out of counties in California behind Los Angeles, San Bernardino, Kern, Riverside, and San Joaquin counties (CEC 2024b)

Petroleum currently accounts for the majority of California's transportation energy consumption. However, technological advances, market trends, consumer behavior, and government policies could result in significant changes in fuel consumption by type and in total. At the federal and state levels, various policies, rules, and regulations have been enacted to improve vehicle fuel efficiency, promote the development and use of alternative fuels, reduce transportation-source air pollutants and greenhouse gas (GHG) emissions, and reduce vehicle miles traveled (VMT).

City College

On the City College campus, petroleum use is associated with gasoline used for on-campus landscaping equipment, the District vehicle fleet, and student, faculty, and staff commuter vehicle trips to and from the campus. The District is currently in the process of purchasing electric landscaping equipment to replace their gasoline powered equipment. In addition, the City College campus currently has EV charging stations located at the P200 Parking Structure (south of Building MS) on the first level to promote the use of alternative fuels and decrease petroleum consumption.

3.5.2 Regulatory Framework

A summary of federal, state, and District regulations that pertain to energy is provided below. No regional or local regulations related to energy apply to the project.

This section focuses primarily on policies, regulations, and laws that directly pertain to the regulation of energy resources. Many regulations and programs that target the reduction of pollutant or GHG emissions are expected to achieve co-benefits in the form of reduced demand for energy-related resources and enhanced efficiencies related to energy consumption. For example, programs that regulate fuel efficiency are relevant to both emissions and energy consumption. Refer to Section 3.2.2 and Section 3.7.2 for additional federal and state regulations related to energy.

3.5.2.1 Federal

At the federal level, the U.S. Department of Transportation (USDOT), the U.S. Department of Energy, and the U.S. Environmental Protection Agency (USEPA) are three agencies with significant influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through the establishment and enforcement of fuel economy standards for automobiles and light trucks, funding energy-related research and development projects, and funding transportation infrastructure improvements. Major relevant federal energy-related laws and plans are discussed below.

Federal Energy Policy and Conservation Act

First enacted in 1975, the Federal Energy Policy and Conservation Act established fuel economy standards for on-road motor vehicles in the U.S. The National Highway Traffic and Safety Administration, which is part of USDOT, is responsible for establishing additional vehicle standards and revising the existing standards under the Energy Policy and Conservation Act. Current standards require a combined passenger car and light-duty truck average fuel economy of 49 miles per gallon by 2026 (National Highway Traffic and Safety Administration 2022). Heavy-duty vehicles (i.e., vehicles and trucks over 8,500 pounds gross vehicle weight) are not currently subject to fuel economy standards. Fuel economy is determined based on each manufacturer's average fuel economy for their fleet of vehicles available for sale in the U.S. On the basis of information gathered under the program, USDOT is authorized to assess penalties for noncompliance. Over its nearly 40-year history, this regulatory program has resulted in vastly improved fuel economy throughout the U.S. vehicle fleet.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 set increased fuel economy standards for motor vehicles as well as a renewable fuel standard, building energy efficiency standards, and appliance and lighting efficiency standards. The lighting efficiency standards required increasing levels of energy efficiency, ultimately requiring light bulbs by 2020 to consume 60 percent less energy and effectively phasing out the incandescent lightbulb.

Under the Energy Independence and Security Act, USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume of renewable fuel. The renewable fuels program was expanded to include diesel fuel in addition to gasoline. The Energy Independence and Security Act also required the USEPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces. Additional provisions of the Energy Independence and Security Act address energy savings in government and public institutions, research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green" jobs.

Intermodal Surface Transportation Efficiency Act of 1991

The Intermodal Surface Transportation Efficiency Act of 1991 promoted the development of inter-modal transportation systems to maximize mobility, as well as to address national and local interests in air quality and energy. It contained factors that Metropolitan Planning Organizations (MPOs) were required to address in developing transportation plans and programs, including some energy-related factors. To meet the new requirements, MPOs adopted explicit policies defining the social, economic, energy, and environmental values that were to guide transportation decisions in that metropolitan area. The planning process for specific projects would then address these policies. Another requirement was to consider the consistency of transportation planning with federal, state, and local energy goals. Through this requirement, energy consumption was expected to become a decision criterion, along with cost and other values that determine the best transportation solution. The Transportation Equity Act for the 21st Century builds upon the initiatives established in the Intermodal Surface Transportation Efficiency Act legislation and authorizes continued and additional highway, highway safety, transit, and other efficient surface transportation programs.

3.5.2.2 State

Renewable Portfolio Standard

Senate Bill 1078

Senate Bill (SB) 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable energy generation by the utilities equivalent to at least one percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently revised as described below.

Senate Bill 1368

SB 1368 (September 2006) required the CEC to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local, publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission.

Executive Order S-14-08

Executive Order (EO) S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency, through collaboration with the CEC and California Department of Fish and Wildlife (CDFW; formerly the California Department of Fish and Game), was directed to lead this effort.

Executive Order S-21-09 and Senate Bill X1-2

EO S-21-09 (September 2009) directed the California Air Resources Board (CARB) to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs or impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1-2 expanded the RPS by establishing a renewable energy target for the total electricity sold to retail customers in California per year of 20 percent by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, PV, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 MW or less), digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

Senate Bill 350

SB 350 (October 2015, Clean Energy and Pollution Reduction Act) further expanded the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year being from renewable sources by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Regarding mobile sources, SB 350 establishes California Public Utilities Code Section 740.12, which involves a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for the achievement of the state's 2030 and 2050 GHG emission reduction targets.

Senate Bill 100

SB 100 (2018) increased the renewable energy standards set forth in SB 350, establishing that of the total electricity sold to retail customers in California per year, 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California by 2045. This bill also requires that the achievement of 100 percent zero-carbon electricity resources does not increase carbon emissions elsewhere in the western grid and that the achievement does not occur through resource shuffling.

Senate Bill 1020

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources:90 percent by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045.

California Energy Code

California Code of Regulations (CCR) Title 24, Part 6 regulations, California's Energy Efficiency Standards for Residential and Non-residential Buildings, were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. Energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space or water heating) results in GHG emissions. The Title 24 standards are updated approximately every three years to allow consideration and possible incorporation of new energy efficiency technologies and methods. The Building Energy Efficiency Standards focus on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. These include standards for on-site solar PV (solar panels) and battery storage systems, electric-ready requirements, indoor air quality requirements, and requirements for EV charging (CEC 2025).

The standards are divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the standards are tailored to local conditions. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that are basically a recipe or a checklist compliance approach.

California Green Building Standards Code

The California Green Building Standards Code (CALGreen; CCR Title 24, Part 11) is a code with mandatory requirements for all non-residential buildings (including industrial buildings) and residential buildings for which no other state agency has the authority to adopt green building standards. CALGreen also contains voluntary measures (i.e., Tier 1, Tier 2) that exceed minimum regulatory requirements. As is the case for the California Energy Code, CALGreen is updated every three years.

The development of CALGreen is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. In short, the code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction.

CALGreen contains requirements for storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation, and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

Assembly Bill 1109

Enacted in 2007, Assembly Bill (AB) 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting in order to reduce electricity consumption by 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.

CEQA Guidelines Appendix F

CEQA Guidelines Appendix F, *Energy Conservation*, provides guidance for Environmental Impact Reports (EIRs) regarding potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing the inefficient, wasteful, and unnecessary consumption of energy. In addition, though not described as thresholds for determining the significance of impacts, CEQA Guidelines Appendix F seeks inclusion of information in an EIR addressing the following topics:

- The project's energy requirements and its energy-use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed.

- The effects of the project on local and regional energy supplies and on requirements for additional capacity.

- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

3.5.2.3 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the District Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

The District's sustainability framework includes goals in carbon reduction, energy efficiency, water conservation, climate resilience, materials management, indoor and outdoor environmental quality, health and wellness, and community engagement. The Sustainability Plan outlines tangible actions that align with long-term sustainability goals. The district also emphasizes education and outreach, community awareness events, and campus-wide sustainability initiatives. The Sustainability Plan incorporates the California Community Colleges Chancellor's Office's comprehensive Climate Action and Sustainability Framework, which includes goals in the following areas: Greenhouse Gas Emissions Reduction; Green Buildings; Energy Efficiency; Water Conservation; Waste Reduction; Sustainable Purchasing and Procurement; Transportation; and Food Systems. Goals related to energy include the following:

Green Buildings

- 2025 Benchmark: Establish energy usage intensity (EUI) scores for each building.
- 2030 Goal: Reduce natural gas usage in buildings by 30%.
- 2035 Goal: Achieve a 75% reduction in natural gas usage.

Energy Efficiency

- 2025 Benchmark: Establish EUI scores.
- 2030 Goal: Decrease EUI by 25%.
- 2035 Goal: Decrease EUI by 40%.

Development of the District's Sustainability Plan also included workshops in which feedback provided by students, faculty, and staff was used to identify key themes to guide the development of the goals for the Sustainability Plan. These goals, which include an associated Key Performance Indicator (KPI) have been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects. The following are related to energy.

Energy Goal 1: Maximize the amount of on-site renewable energy generation. **KPI:** Solar Panels installed on every new building.

Energy Goal 2: Carbon Reduction. **KPI:** Build all electric facilities. No natural gas. **KPI:** Utilize all electric vehicles for SDCCD facilities use.

Energy Goal 3: Decrease Energy Consumption. **KPI:** Meter each building. **KPI:** Utilize cool roofs. **KPI:** Utilize natural daylight. i.e. skylights.

SDCCD Sustainability Levels

The District's Sustainability Levels are designed to recognize, measure, and promote sustainable practices across District campuses and facilities. They provide a tiered rating system that encourages environmentally responsible design, construction, and operations. All District capital projects, including new construction, major renovations, and modernization, are required to incorporate the principles outlined in the District Sustainability Levels and meet applicable local, state, and District-adopted sustainability policies. District-adopted sustainability standards include the following:

1. Each campus shall facilitate and maintain an ongoing waste recycling program that establishes where facilities on campus will handle recycled materials including paper, cardboard, glass, plastics, and metal.

2. Renewable woods shall be specified and detailed.

3. The designer shall specify the Carpet and Rug Institute's Green Label Plus Program. All carpet cushion installed in the building shall have low emitting materials and backing.

4. The District's Facilities Services have adopted a program of Green cleaning materials and techniques.

The District's Sustainability Levels include categories with specific requirements that each have an assigned point value. The categories include project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation. A scorecard is filled out based on the requirements the project achieves, which determines the sustainability level for the project from the following:

- Baseline/ Sagebrush (Baseline Sustainability) – Meets the District's minimum sustainability standards, with basic energy and water conservation measures.

- Certified/ Coast Live Oak (Sustainable Performance) – Demonstrates significant sustainable strategies.

- Silver/ Torrey Pine (High-Performance Green Building) – Meets advanced sustainable quality benchmarks.

- Gold/ Redwood (Leadership in Sustainability) – Implements innovative sustainability strategies.

- Platinum/ Sequoia (Exemplar of Sustainability) – Sets model for sustainable education facilities.

All final programming documents must contain a section related to sustainability. The conceptual design for new building projects must have sustainable features that achieve the Certified/Coastal Live Oak level at a minimum. Conceptual design schemes for major renovation projects should have sustainable features and may be required to achieve a Certified/Coastal Live Oak level; however, this is determined on a case-by-case basis based on the feasibility of incorporating such features into a renovation project.

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following specifications are related to energy.

Heating, Ventilation, and Air Conditioning

This section includes the following energy efficiency standards for HVAC systems installed on District properties. Specific requirements are included in the areas of system components for energy efficiency, fan and motor efficiency, optimized airflow and exhaust placement, thermostat placement considerations, control system integration, and economizer requirements.

Site Furnishings

This section directs projects implemented on District properties to provide solar-powered aluminum umbrellas equipped with integrated PV panels capable of charging mobile devices in outdoor environments. The system must support at least three dual USB charging ports for use with phones, tablets, and laptops. Umbrellas should be compatible with standard outdoor table configurations (e.g., carousel-style) and be available in a range of durable, weather-resistant finishes and color options.

Electric Power Generation

This section states that the District is committed to implementing clean, resilient, and code compliant energy systems in support of California's energy goals, District sustainability objectives, and long-term operational efficiency. This section additionally establishes the minimum requirements for the design, installation, and integration of PV systems and battery energy storage systems on new construction and major modernization projects within the District. The District has committed to providing 1 MW of PV generation capacity at Mesa College, City College, and Miramar College.

District Board Policies and Administrative Procedures

Board Policy 6970: Green Building Policy and Major Renovation Standards. The Board of Trustees has established a Green Building Policy and Major Renovation Standards to provide District students, faculty and staff with working and learning environments that are healthy, thermally, visually, and acoustically comfortable; energy efficient; material efficient; water efficient; easy to maintain and operate; safe and secure and sited in an environmentally responsible manner. In accordance with this Board Policy, the District selects architects, engineers and other professionals who have demonstrated expertise in sustainable design and are Leadership in Energy and Environmental Design (LEED) accredited as deemed appropriate.

Administrative Procedure 6970: Green Buildings. The purpose of this procedure is to provide guidance for implementing District policies and standards for the design and construction of green buildings and renovations. Efficient energy use and efficiently designed buildings are central to resource sustainability efforts of the District, City, and state. Energy conservation in building design 1) reduces the operating costs of the District, 2) reduces the carbon footprint of the District, and 3) provides environmental education. This Administrative Procedure goes on to outline criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED for New Construction (LEED-NC) gold rating, and requiring that at least 5 percent of a project's total energy is generated on site from renewable sources.

3.5.3 Thresholds of Significance

Thresholds used to evaluate potential energy impacts are based on CEQA Guidelines Appendix G. A significant energy impact could occur if implementation of the proposed project would:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or

2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.4 Impact Analysis

3.5.4.1 Energy Consumption

Threshold 1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact Discussion

Program-Level

Electricity

During construction of projects implemented under the FMP, temporary electric power would be provided by SDG&E for as-necessary lighting and electronic equipment (including use for computers, HVAC within construction trailers), and electrically powered hand tools. In the context of regional electricity demand, the electricity used for construction activities would be temporary and minimal. It also would be used on an as-needed basis and, therefore, would not be wasteful, inefficient, or unnecessary.

Once projects implemented under the FMP become operational, electricity would be used in a similar manner compared to existing conditions, which includes electricity for interior and exterior lighting, HVAC systems, computer and office equipment, refrigeration and cooking equipment in dining halls, EV charging stations, and additional building operations such as security systems and elevators. As discussed in Section 3.5.1.1, the City College campus used approximately 8.5 million kWh of electricity in the one-year period between March 2024 and February 2025. Based on the existing on-campus building area, this yearly electricity usage equates to an electricity consumption rate of approximately 6.33 kWh per gross square foot (GSF) of building area. To estimate the electricity that would be required for full buildout of the FMP, this consumption rate was applied to the total building area that would comprise

the City College campus in 2045 with implementation of the FMP. In accordance with District policies, future buildings constructed as part of the FMP would typically be all-electric (would not use natural gas unless required by specific, limited functions). Therefore, the natural gas use for the newly proposed buildings was converted to the equivalent energy in electricity and added to the electricity use that was calculated using the District energy consumption rates. These calculations estimate that the electricity consumed during full buildout of the FMP would be approximately 12.7 million kWh per year.

The projects implemented under the FMP would be required to comply with all federal, state, and District policies related to energy conservation. The District currently implements green building standards in campus facilities in accordance with Board Policy 6970 (Green Building Policy and Major Renovation Standards) and Administrative Procedure 6970 (Green Buildings) as outlined in Section 3.5.2.3. Board Policy 6970 requires the District to select architects, engineers and other professionals who have demonstrated expertise in sustainable design and are accredited. Administrative Procedure 6970 provides guidance for implementing District policies and standards for the design and construction of green buildings and renovations and outlines criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least five percent of a project's total energy is generated on site from renewable sources. The District has additionally developed the Sustainability Levels, which provide a tiered rating system that encourages environmentally responsible design, construction, and operations. This system applies to new construction, major renovations, and modernization projects. The Sustainability Levels framework identifies incentives for energy and carbon performance standards, including energy efficiency greater than Title 24 requirements, integration of on-site renewable energy sources and battery storage.

While implementation of the FMP would increase the overall demand for electricity at City College, the replacement or renovation of older, less efficient buildings with new construction to current, more stringent energy codes would make electricity use more efficient. With adherence to state building codes that regulate energy efficiency and implementation of the District policies related to energy conservation outlined above, implementation of the FMP would not result in the wasteful, inefficient, or unnecessary consumption of electricity during project construction or operation.

Natural Gas

Natural gas is not anticipated to be required during construction of projects under the FMP. Fuels used for construction would primarily consist of diesel and gasoline, which are discussed below. Any minor amount of natural gas that may be consumed as a result of project construction activities would be temporary and negligible and would not occur in a wasteful manner.

The District Design Guidelines and Standards Manual includes policies related to building electrification, including a goal to achieve a 75 percent reduction in natural gas usage by 2035 and to build new facilities with no natural gas connections. The District standard is for all new buildings to be all-electric and not use natural gas for processes that can rely instead on electricity, such as building or water heating. Natural gas would only be used in limited, function-specific instances where electric alternatives are not feasible, subject to prior approval by the District Architect. As discussed in Section 3.5.1.1, the City College campus used approximately 17.9 million kBTU of natural gas in the one-year period from March 2024 to February 2025. Based on the existing on-campus building area, this yearly natural gas usage equates to a natural gas consumption rate of approximately 13.3 kBTU per GSF of building area.

Assuming demolition of existing buildings planned under the FMP removes natural gas at this rate, it was estimated that the natural gas consumed during full buildout of the FMP would be approximately 15.9 million kBTU per year. This would represent a decrease of approximately two million kBTU of natural gas compared to existing conditions. Further, the older buildings on campus are generally those planned for demolition; therefore, it is likely that natural gas use would actually be reduced beyond this level as these buildings are typically more reliant on natural gas under existing conditions. As building and water heating equipment requires replacement, these sources of natural gas consumption would also be replaced with electric equivalents, thereby reducing natural gas consumption beyond the levels noted with demolition of existing buildings. Overall, the FMP is anticipated to reduce natural gas over the buildout period through building replacements with all-electric construction and replacement of gas-powered equipment. Therefore, implementation of the FMP would not result in the wasteful, inefficient, or unnecessary consumption of natural gas during project construction or operation.

Petroleum

Petroleum-based fuels, including gasoline and diesel, would be the primary source of energy during construction. Fuel consumed by construction equipment would be the primary source of energy consumption during construction, while the transportation of construction materials and construction workers would also use fuel resources. Heavy-duty construction equipment associated with construction activities, as well as haul trucks involved in moving dirt around the project site, are anticipated to rely on diesel fuel. Construction workers would travel to and from the project site throughout the duration of construction projects. It is assumed that construction workers would travel to and from the project site mainly in gasoline-powered vehicles.

The projects implemented under the FMP would be required to comply with CARB's Airborne Toxics Control Measure, which restricts heavy-duty diesel vehicle idling time to no more than five minutes. Furthermore, the construction practices used on campus would be typical and would not require specialized construction equipment or otherwise present unusual circumstances in which substantial amounts of fuel would be required. In addition, given the high cost of fuel, contractors and the District have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of these resources during construction. Therefore, petroleum use during construction of the projects under the FMP would be temporary and would not be wasteful or inefficient.

The majority of fuel consumption during operation of the proposed projects under the FMP would be used by vehicles traveling to and from the City College campus for student, faculty, and staff commutes. Although the amount of vehicle trips is expected to increase during buildout of the FMP as a result of regional growth and could result in an increase in petroleum use, over the lifetime of the proposed FMP projects, the fuel efficiency of the vehicles used by students, faculty, and staff is expected to increase. This is largely due to increasing statewide fuel economy standards and an anticipated shift in the statewide vehicle fleet to increased numbers of EVs. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California. Buildout of the FMP would support the implementation of these efforts with the installation of EV charging infrastructure in new parking facilities. Overall, these practices are consistent with state transportation energy and emissions policies, including CARB vehicle standards and statewide electrification goals.

In addition, petroleum would be utilized to power the District fleet. However, the District is currently purchasing zero-emission vehicles for maintenance and facilities staff as the fleet requires replacement, which would reduce the amount of petroleum consumed by District vehicles over time compared to existing conditions. While the FMP would result in the consumption of petroleum-based fuels during operations, implementation of the FMP would not result in the wasteful, inefficient, or unnecessary consumption of petroleum-based energy resources.

Project-Level

Construction of the near-term projects would primarily require the use of electricity and petroleum as described in the program-level analysis above. However, each of the near-term projects would use these resources temporarily and, as discussed further for the program-level above, their use would not occur in a wasteful or inefficient manner.

Once the near-term projects become operational, they would each be required to comply with the District policies related to energy efficiency and conservation outlined in the program-level analysis above. Specifically, the Performing Arts and Administration and Parking Structure project would construct EV charging stations within the parking structure. In addition, the buildings constructed by the near-term projects would be required to include sustainable features outlined in the District's Sustainability Levels that achieve the Certified/Coastal Live Oak level at a minimum (see Section 3.5.2.3 for additional information regarding this program). Further, construction of the near-term projects would be required to comply with Administrative Procedure 6970, which is discussed in Section 3.5.4.2 below. Based on the land uses proposed for the Building A Expansion, Performing Arts Center, and North Campus Athletic Fields projects, none of the near-term projects are anticipated to be constructed with natural gas connections and would be all-electric. However, as discussed in the program-level analysis above, natural gas may be used in select instances where electricity would not serve the intended use and with prior approval by the District Architect. Should certain components of the near-term projects require the use of natural gas, the amount would be minimal and necessary as it would be limited to the functions that cannot operate with electricity use alone. The near-term projects would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

As discussed at the program-level above, the majority of fuel consumption during operation of the FMP would be the result of vehicles traveling to and from the City College campus for student, faculty, and staff commutes. The near-term projects would not cause a direct increase in vehicle trips involving the use of gasoline and would be constructed within a transit priority area where alternatives to single-occupancy vehicle travel are available. With implementation of District policies related to energy efficiency and conservation, implementation of the near-term projects would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.5.4.2 Energy Plans

Threshold 2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Discussion

Program-Level

The projects proposed under the FMP would comply with applicable energy standards and regulations during construction and would be built and operated in accordance with applicable building regulations in effect at the time of construction. These regulations would include CALGreen, which contains requirements for construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation, and the California Energy Code, which includes standards for on-site solar PV panels and battery storage systems, electric-ready requirements, indoor air quality requirements, and requirements for EV charging.

The District has outlined various policies which implement the renewable energy and energy efficiency guidance within the Community Colleges Board of Governors' Climate Action and Sustainability Framework. At the District level, projects implemented under the FMP involving new construction, major renovations, and modernization, are required to incorporate the principles outlined in the District Sustainability Levels. Within the categories of project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation, the Sustainability Levels framework outlines specific implementation methods which would be applied to these projects as feasible. Each project implemented under the FMP would be required to achieve a Certified/Coastal Live Oak level, which demonstrates significant sustainable strategies. See Section 3.5.2.3 for additional information. Specific implementation methods which would relate to energy include all electric construction, energy modeling analysis to inform selection of project energy systems, demonstrating energy savings up to 20 percent greater than Title 24 baseline standards, and generating at least 20 percent of the project's annual energy demand through on-site renewable energy sources such as PV systems or wind turbines.

In addition, projects implemented under the FMP would be required to comply with Administrative Procedure 6970 (Green Buildings), which establishes criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least five percent of a project's total energy is generated on site from renewable sources. In addition, projects implemented under the FMP which involve parking facilities would install EV charging stations, and new buildings would be all-electric to the extent feasible.

In addition, the City College campus currently hosts a 650-kilowatt hydrogen fuel cell grid and PV panels rated approximately one-MW that generate renewable energy on-campus. The District has previously used programs intended to increase renewable energy generation, such as power purchase agreements for solar panels on other campuses. While no specific renewable energy facilities are part of the FMP, the District would continue to evaluate the feasibility of incorporating such technology on campus as it is available and economically feasible. As such, implementation of the FMP would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Project-Level

The near-term projects would be required to comply with the state and District requirements for energy efficiency outlined in the program-level analysis above. Each of the buildings constructed by the near-term projects would be required to comply with CALGreen and California Energy Code requirements, include sustainable features outlined in the District's Sustainability Levels, and achieve the goals and requirements outlined in Administrative Procedure 6970 (Green Buildings). In addition, each of the near-term projects is anticipated to be all-electric. However, should the near-term projects require the use of natural gas for specific functions, the amount would be minimal and would not result in conflicts with a state or local plan for renewable energy or energy efficiency. Therefore, implementation of the near-term projects would not conflict or obstruct the implementation of state energy efficiency plans, the Community Colleges Board of Governors' Climate Action and Sustainability Framework, or the District guidance related to energy efficiency.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.5.5 Cumulative Impact Analysis

The geographic scope for projects that may have a potential cumulative impact related to energy are projects occurring within the areas served by the project's energy service provider (SDG&E).

3.5.5.1 Energy Consumption

Potential cumulative impacts related to energy consumption could result if the proposed FMP, in combination with past, present, and future projects, would result in the wasteful or inefficient use of energy. This could result from development that would not incorporate sufficient building energy efficiency features, not achieve building energy efficiency standards, or would result in the wasteful or unnecessary use of energy during construction or operations. Projects that would mostly include construction, such as transportation infrastructure, could also contribute to a cumulative impact; however, the impact of these projects would be limited because they would typically not involve ongoing, substantial energy use. Similar to the proposed FMP projects, cumulative development projects would be subject to applicable state energy efficiency regulations, such as CALGreen and California Energy Code energy efficiency standards. Future development would be required to meet increasingly stringent building standards as they are set forth by the state. As discussed above, the implementation of the FMP, including the near-term projects, would not result in the wasteful or inefficient use of energy. Therefore, the cumulative impact related to the wasteful or inefficient use of energy from the proposed FMP, in combination with cumulative projects, would be **less than significant**.

3.5.5.2 Energy Plans

Cumulative development projects would be required to comply with increasingly stringent building standards set forth by the state, such as CALGreen and the California Energy Code, in addition to local energy efficiency requirements such as the City's Climate Action Plan (CAP), where applicable. These regulations also direct the provision of renewable energy on new construction, typically in the form of solar PV systems. Similarly, the project would be required to comply with District policies and state

requirements for increasing energy efficiency. Therefore, the cumulative impact from the proposed FMP, in combination with cumulative projects, would be **less than significant**.

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3.6 Geology and Soils

This section addresses the potential geology and soils impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to geology and soils are also addressed. This section relies on the information and analysis in the Geology and Soils Technical Study prepared by Ninyo & Moore (2025), and the Paleontological Resources Technical Report prepared by the San Diego Natural History Museum (SDNHM) Department of PaleoServices (2026) provided as Appendix F and Appendix G, respectively, to the PEIR.

3.6.1 Environmental Setting

3.6.1.1 Geologic Setting

The project site is situated in the San Diego County (County) coastal section of the Peninsular Ranges Geomorphic Province (Province). This Province encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin on the north to the southern tip of Baja California on the south. The Province varies in width from approximately 30 to 100 miles. In general, the Province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the southern California batholith. In the coastal plain portion of the Province where the project site is located, Quaternary-age sedimentary deposits overlie Tertiary- and Cretaceous-age sedimentary units.

The Province is traversed by a group of sub-parallel faults and fault zones trending roughly northwest. Several of these faults are considered active faults, including the Elsinore, San Jacinto, and San Andreas fault systems located northeast of the project site. The Coronado Bank, San Diego Trough, and San Clemente faults are also active faults located west of the project site. Strands of the Rose Canyon fault zone, the nearest active fault system to the project site, are mapped across the western portion of South Campus near the existing Gorton Quad and Buildings D, A, M, L, R, and C. Major tectonic activity associated with these regional fault systems primarily consists of right-lateral, strike-slip movement. See Section 3.6.1.2 below for additional discussion of faulting and seismicity in the project area.

Soils and Fill Materials

The soil units mapped on the campus include Urban Land and Made Land, both of which are considered to have no agricultural use and low to moderate erosion potential. Based on a review of geologic maps, reviews of on-site and nearby geotechnical reports, and a site survey, soils underlying the project site are generally anticipated to consist of fill materials, alluvium, old paralic deposits (also referred to as Bay Point Formation), and materials of the San Diego Formation. The characteristics of these soil types and their locations on campus are described below.

Artificial Fill

Artificial fill associated with original and ongoing campus development is present across the project site. As encountered in borings performed at the site, the fill materials are generally various shades of brown, loose to dense silty and clayey sand with lesser amounts of clay. Contaminants such as burn ash have been encountered within artificial fill at the project site and, where identified, were generally removed

during development. The thickness of fill material is anticipated to vary across the project site and range from surface-level layers up to approximately 16 feet in depth.

Alluvium

Although not mapped within the project site, alluvium has been encountered in borings, particularly in the southeastern portion of the project site. The alluvium encountered in borings was described as loose to medium dense, friable sand with gravel and cobbles and ranged up to approximately 12 feet in thickness. The alluvium is assumed to be associated with alluvial flow from Powerhouse Canyon northwest of the project site.

Old Paralic Deposits

Quaternary-age old paralic deposits (also referred to as the Bay Point Formation) are mapped as underlying the southern portion of North Campus and southern, western, and eastern portions of South Campus. These deposit materials consist of poorly sorted, moderately permeable, reddish brown, interfingered strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. The old paralic deposits encountered in borings at the project site generally consist of dense to very dense, silty sand, clayey sand, poorly graded sand, and poorly graded gravel with cobbles.

San Diego Formation

Materials of the Pliocene-age San Diego Formation are mapped as underlying the northern portions of North Campus and northern and central portions of South Campus and are anticipated to underlie the southern portion of the project site at depth. The San Diego Formation generally consists of mostly brown and yellowish brown, weakly to strongly cemented, silty to clayey sandstone. Layers of siltstone, gravel, and cobbles have been encountered within the on-site San Diego Formation materials.

Groundwater

Data from boring logs and groundwater monitoring wells within the project area indicate that groundwater is present beneath the project site at elevations ranging from approximately -3 feet above mean sea level (AMSL) to approximately 10 feet AMSL. Elevations across the project site range from approximately 60 feet AMSL to 170 feet AMSL; therefore, groundwater occurs at least 50 feet below ground surface across campus. Groundwater depths and flow directions can vary due to tidal influence, seasonal variations, construction dewatering, lithology, and other factors though groundwater is expected to follow the topographic gradient and flow of the project site, generally towards the south.

According to the State Water Resources Control Board (SWRCB) Water Quality Control Plan for the San Diego Basin (The Basin Plan), the site is located within the Lindbergh Hydrologic Subarea (HSA) within the San Diego Mesa Hydrologic Area (HA) within the Pueblo San Diego Hydrologic Unit (HU). This HA has been exempted by the Regional Water Quality Control Board (RWQCB) from the municipal drinking water use designation. See Section 3.9, *Hydrology and Water Quality*, for additional information.

3.6.1.2 Geologic Hazards

Faulting and Seismicity

The project site is located in a seismically active area with the potential for strong ground motion at the project site. The Rose Canyon fault zone, the nearest active fault zone to the project site, consists of predominantly right-lateral strike-slip faults that extend south-southeast through the County. In the downtown area of the City of San Diego (City), active strands within the Rose Canyon fault zone include the generally north-south trending Coronado Fault, San Diego Fault, and Downtown Graben. These fault splays are designated active by the State of California, meaning they exhibit evidence of ground displacement during Holocene time, which includes the last 11,000 years. Therefore, these faults constitute a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Studies Zone).

In the eastern portion of downtown San Diego, where the project site occurs, the Downtown Graben active strand consists of parallel faults that offset Holocene-age sediments. As shown on Figure 3.6-1, *Earthquake Fault Zones*, two of these faults traverse the western portion of South Campus, generally between Park Boulevard and 14th Street and north of C Street.

Per the City of San Diego Safety Study, Geologic Hazards and Faults (City 2008), the campus is predominantly mapped within hazard category 13, the Downtown Special Fault Zone, and hazard category 11, an active Alquist-Priolo fault zone. Areas of hazard category 12, which is defined as potentially active, inactive, presumed inactive, or activity unknown fault zones, are mapped along two of the on-site faults, within the hazard category 11 zone. However, as described previously, these two faults, associated with the Downtown Graben active strand, are considered active based on the State of California Earthquake Fault Zone classification.

Landslides

Landslides have not been mapped on or adjacent to the project site and evidence of landsliding was not observed on aerial photographs or during the site survey. Although the project site is located within an area mapped as being generally susceptible to landslides, the geologic units underlying the project site are not considered susceptible to landsliding. The potential for landsliding or slope instability on campus is considered low, with the northern portion of the site (northwest of Park Boulevard) mapped as being least susceptible to landslides.

Liquefaction and Seismically Induced Settlement

Liquefaction is the phenomenon in which ground shaking of sufficient duration results in the loss of grain-to-grain contact due to rapid rise in pore water pressure, which eventually causes the soil to behave as a fluid for a short period of time. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, groundwater level, degree of saturation, and both intensity and duration of ground shaking. Liquefaction typically occurs when loosely deposited, saturated granular soils located below the water table with clay contents of less than 15 percent, liquid limit of less than 35 percent, and natural moisture content greater than 90 percent of the liquid limit undergo rapid loss of shear strength due to development of excess pore pressure during strong earthquake-induced ground shaking. Liquefaction is known to generally occur in saturated or near saturated, cohesionless soils at depths shallower than 50 feet below grade.

Based on the relatively dense nature of the underlying materials and the absence of a shallow groundwater table, the risk for liquefaction at the project site is low. A review of previous geotechnical evaluations of the project site showed that seismically induced settlements have been known to occur at the site in areas where loose to medium dense, undocumented fill and alluvium were encountered which indicate seismic settlements up to approximately 1.25 inches.

Soil Expansion

Soil expansion generally results from the presence of specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Shrinking or swelling of foundation soils can lead to damage to slabs, foundations, and other engineered structures, including tilting and cracking. The expansion potential of a soil is determined through laboratory testing to determine if the expansion index of a soil is very low to very high. Clayey fill soils and old paralic deposits which occur at the project site are considered to be moderately expansive.

3.6.1.3 Paleontological Resources

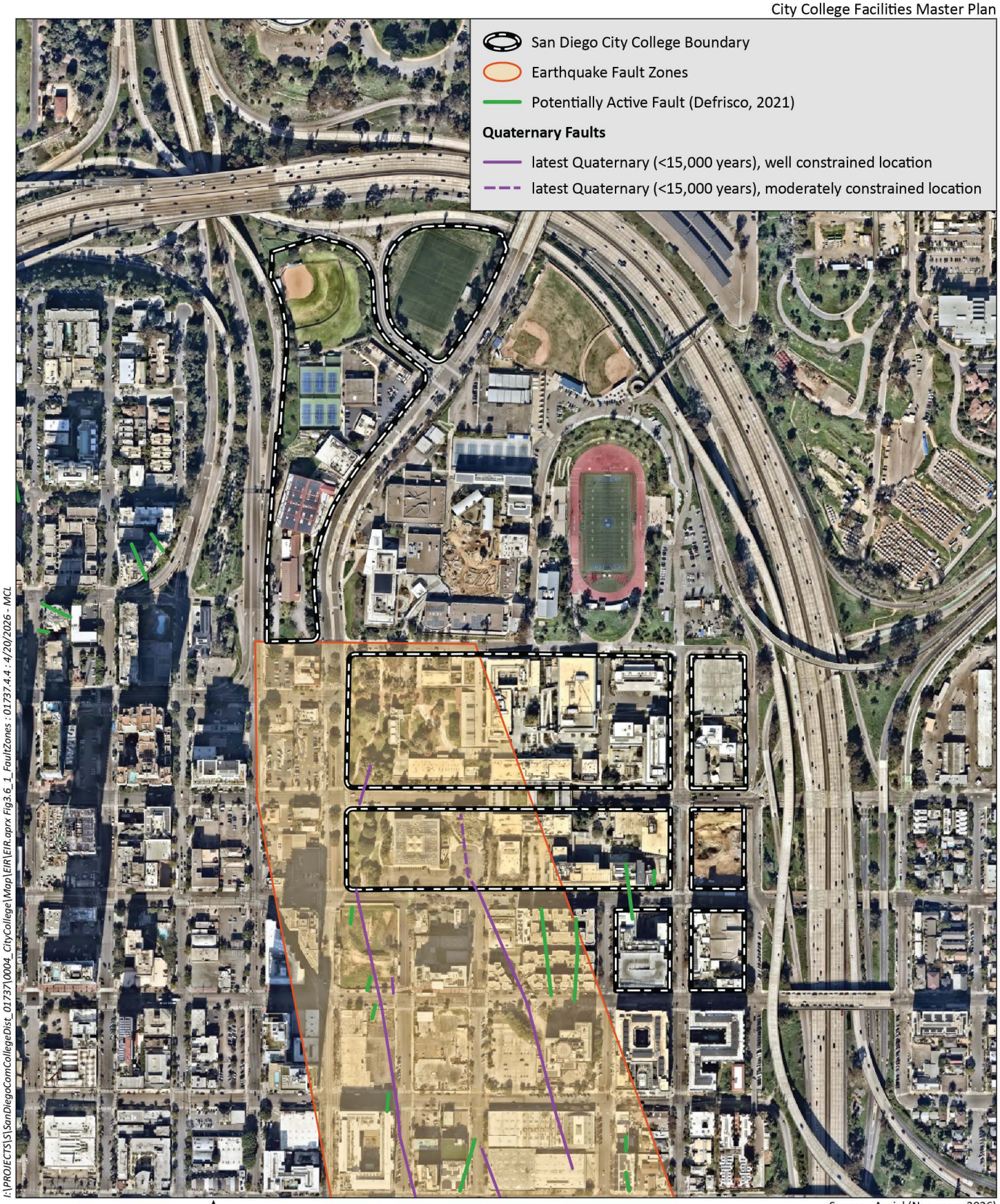
Paleontological resources (fossils) are the remains of indications of ancient, non-human organisms and, as such, are scarce, non-renewable natural resources. Fossil remains such as bones, teeth, shells, and leaves are found in geologic deposits (rock formations) where they were originally buried. As a result, the potential for fossils in an area can be predicted based on known relationships between geologic formations and fossil occurrences. Although typically it is assumed that fossils must be older than approximately 11,700 years, organic remains older than recorded human history and/or older than middle Holocene (about 5,000 radiocarbon years) can also be considered to represent fossils.

The campus is underlain by late Pleistocene-age (approximately 120,000 years old) old paralic deposits, Unit 6 (equivalent to the Bay Point Formation) and strata of the Pliocene- to early Pleistocene-age (approximately 4 to 1.5 million years old) San Diego Formation. The Bay Point Formation is mapped at the surface within the southern half of the City College campus, including nearly all of the campus south of B Street, while the San Diego Formation is anticipated to underlie the entire campus (either at the surface, as indicated on geologic maps in the northern half of the campus, or in the subsurface in the southern half of the campus where it is overlain by the Bay Point Formation).

As discussed above, the project site contains the Bay Point Formation and San Diego Formation which are assigned a high paleontological resource sensitivity based on the documented occurrence of diverse marine invertebrate and vertebrate fossil assemblages preserved within these geologic units. A search of the SDNHM paleontological collections database identified 312 fossil localities within a one-mile radius of the project site, five of which are located within the project site. The SDNHM identified 156 fossil localities from the San Diego Formation, along with nine localities tentatively assigned to the San Diego Formation, 147 fossil localities from the Bay Point Formation within a one-mile radius of the project site. The additional material identified on the project site (artificial fill and alluvium) are assigned no/zero to low paleontological resource sensitivity.

3.6.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to geology and soils is provided below.



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Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Earthquake Fault Zones

Figure 3.6-1

3.6.2.1 Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act of 1977 (Public Law 95-124) established the National Earthquake Hazards Reduction Program, which is coordinated through the Federal Emergency Management Agency (FEMA), the U.S. Geological Survey (USGS), the National Science Foundation, and the National Institute of Standards and Technology. The purpose of this program is to establish measures for earthquake hazards reduction and promote the adoption of earthquake hazards reduction measures by federal, state, and local governments; national standards and model code organizations; architects and engineers; building owners; and others with a role in planning and constructing buildings, structures, and lifelines through (1) grants, contracts, cooperative agreements, and technical assistance; (2) development of standards, guidelines, and voluntary consensus codes for earthquake hazards reduction for buildings, structures, and lifelines; and (3) development and maintenance of a repository of information, including technical data, on seismic risk and hazards reduction. The National Earthquake Hazards Reduction Program is intended to improve the understanding of earthquakes and their effects on communities, buildings, structures, and lifelines through interdisciplinary research that involves engineering, natural sciences, and social, economic, and decisions sciences.

Disaster Mitigation Act of 2000

The Federal Disaster Mitigation Act of 2000 (Public Law 106-390) provides the legal basis for FEMA mitigation planning requirements for state, local, and tribal governments as a condition of mitigation grant assistance. This act amended the Robert T. Stafford Disaster Relief and Emergency Assistance Act by repealing the previous mitigation planning provisions and replacing them with a new set of requirements that emphasizes the need for state, local, and tribal entities to closely coordinate mitigation planning and implementation efforts. The requirement for a state mitigation plan is continued as a condition of disaster assistance, adding incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two levels of state plans. This act also established a new requirement for local mitigation plans and authorized up to seven percent of Hazard Mitigation Grand Program funds to be available to a state for the development of state, local, and tribal mitigation plans.

International Building Code

The International Building Code (IBC) is one of the International Codes published by the International Code Council and forms the basis for the California Building Code (CBC), as well as most of the state building codes in the U.S. The IBC assigns buildings risk categories and design requirements based on the intended use of a facility. The IBC has been adopted by the California Legislature to address specific building conditions and structural requirements for California, as well as provide guidance on foundation design and structural engineering practices for different soil types.

U.S. Geological Survey Landslide Hazards Program

The USGS Landslide Hazard Program provides information on landslide hazards, including information on current landslides, landslide reporting, real-time monitoring of landslide areas, mapping of landslides through the National Landslide Hazards Map, local landslide information, landslide education, and research.

3.6.2.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code [PRC] Sections 2621-2630, Division 2 Chapter 7.5) was passed in 1972 to mitigate the hazard of surface faulting to structures intended for human occupancy. The purpose of this act is to prevent the construction of buildings used for human occupancy on the surface trace of active faults. The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. The act requires the State Geologist to establish regulatory zones, known as "Earthquake Fault Zones," around the surface traces of active faults and to issue appropriate maps. Local agencies must regulate most development projects within these zones. Before a project can be permitted, cities and counties must require a geologic investigation to demonstrate that proposed buildings for human occupancy would not be constructed across active faults. An evaluation and written report of a specific site must be prepared by a licensed geologist. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back from the fault (typically 50-foot setbacks are required).

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 directs the California Department of Conservation (DOC), California Geological Survey (CGS) to identify and map areas prone to liquefaction, earthquake-induced landslides, and amplified ground shaking. The purpose of the Seismic Hazards Mapping Act is to minimize loss of life and property through the identification, evaluation, and mitigation of seismic hazards. Staff geologists gather existing geological, geophysical, and geotechnical data from numerous sources to produce the Seismic Hazard Zone Maps. They integrate and interpret these data regionally to evaluate the severity of seismic hazards and designate Zones of Required Investigation for those areas prone to liquefaction and earthquake-induced landslides. Cities and counties are then required to use the Seismic Hazard Zone Maps in their land use planning and building permit processes. The Seismic Hazards Mapping Act requires that site-specific geotechnical investigations be conducted within the Zones of Required Investigation to identify and evaluate seismic hazards (i.e., liquefaction and earthquake-induced landslides) and formulate mitigation or recommendations to reduce these hazards prior to permitting most developments designed for human occupancy.

Special Publication 117A

The CGS prepared the Guidelines for Evaluating and Mitigating Seismic Hazards in California (Special Publication 117A) in 2008, revising the 1997 edition of this publication. Special Publication 117A constitutes the guidelines for evaluating seismic hazards other than surface fault-rupture and for recommending mitigation measures as required by PRC Section 2695(a). The objectives of Special Publication 117A are to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigation and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act.

California Geologic Survey Note 48 Requirements

CGS Note 48 is a checklist used by CGS to evaluate engineering geology and seismology reports prepared for public schools, hospitals, skilled nursing facilities, and essential services buildings under the CBC. It

outlines the required components of these reports, including assessments of faulting, landslides, liquefaction, and other geologic hazards, and ensures they meet regulatory standards prior to approval by agencies such as the Division of the State Architect (DSA) for schools.

California Building Standards Code

California building standards are published in California Code of Regulations (CCR) Title 24, also known as the California Building Standards Code. The California Building Standards Code, which applies to all applications for building permits, consists of 11 parts that contain administrative regulations for the California Building Standards Commission and for all state agencies that implement or enforce building standards. Local agencies must ensure development complies with the California Building Standards Code. Cities and counties can also adopt additional building standards that are more stringent than the California Building Standards Code. Title 24, Part 2, the CBC, is based upon the IBC, as described below.

California Building Code

The CBC, Part 2 of the California Building Standards Code, is included in CCR Title 24. The CBC incorporates the IBC, a model building code adopted across the U.S. Through the CBC, the state provides a minimum standard for building design and construction. The CBC contains specific requirements for seismic safety, foundations, retaining walls, and site demolition. The CBC also includes provisions for grading, including drainage and erosion control. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with a specified probability of occurring at a site.

Chapter 16, Structural Design, of the CBC requires that structural designs be based on geologic information for seismic parameters, soil characteristics, and site geology. Chapter 18, Soils and Foundations, defines the criteria for preparation of a geotechnical report. It also sets requirements for excavations and fills, foundations, and retaining structures with regard to expansive soils; design measures to address liquefaction potential, if warranted; subgrade bearing capacity; seismic design parameters; and waterproofing and damp proofing foundations. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials.

3.6.2.3 Regional

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan was prepared to comply with the Disaster Mitigation Act of 2000 and increase disaster planning funding for the region. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdiction coordination. The Multi-Jurisdictional Hazard Mitigation Plan identifies coastal storms/erosion/tsunamis, dam failure, earthquakes, and landslides among the top hazards in the County due to the potential loss of life, injuries, and damage to property, as well as the potential for associated disruptions of public services.

3.6.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, Design Guides and Standards, outlines general procedures and standards for new construction and building modifications on District campuses.

Building Programming Standards

The Building Related Programming section states that building additions on District properties require that the existing portion of the building be surveyed to determine compliance (or noncompliance) with the Americans with Disabilities Act (ADA) and CBC (seismic related design), and the determine the presence or absence of toxic substances such as asbestos or lead-based paint.

Stormwater Management

The Stormwater Management section of the Design Guides and Standards includes requirements for compliance with SWRCB permits. Specifically, this section requires projects that would disturb less than one acre to prepare a Water Pollution Control Plan (WPCP) to manage sediment, materials, waste, and other pollutants in stormwater. Further, this section states that projects which would disturb more than one acre are subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit for stormwater discharges associated with construction and land disturbance activities (Order WQ 2022-0057-DWQ NPDES No. CAS000002). A Stormwater Pollution Prevention Plan (SWPPP) identifying site-specific best management practices (BMPs) must be developed to meet Construction General Permit requirements based on the project's risk level.

General Specifications

Section 2.2, of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to geology and soils are anticipated to apply to future projects.

Geotechnical Requirements

The Geotechnical Requirements section of the General Specifications states that a project-specific geotechnical and seismic report is required for all new construction and must undergo DOC review as part of the DSA approval process and adhere to Note 48 requirements. Specific requirements for the geotechnical and seismic report are outlined for areas such as earthwork specifications and documentation, stormwater infiltration, subsurface conditions, foundations and structural support, expansive soils and corrosive materials, slab and pavement support, geologic and fault evaluation, seismic response and hazard mitigation, and overall documentation.

Earthwork Requirements

The Earthwork Requirements section of the General Specifications states that earthwork and grading design shall follow the recommendations provided in the project-specific geotechnical report, which serves as the basis for all site preparation, excavation, fill, and slope stability strategies. The geotechnical report shall guide the design team in determining suitable excavation methods, compaction requirements, allowable bearing pressures, and subgrade preparation for both structural and non-structural areas. All grading activities shall account for site-specific soil conditions and be coordinated with the geotechnical engineer of record. The Earthwork Requirements also include specifications for cut and fill operations, reuse of native soils, slopes, grading, and drainage design.

3.6.2.5 Local (Non-Regulatory)

While the District is not subject to local zoning or land use planning documents, the campus is located adjacent to the City's right-of-way (ROW) and could require work within these areas. City plans and policies also provide relevant background information that is considered in the project impact analysis given the geologic setting for the project is consistent with that in the surrounding portions of the City. Therefore, a summary of City policies related to geologic hazards and grading is provided below.

City of San Diego Seismic Safety Study

The City's Seismic Safety Study Geologic Hazards and Faults maps document the known and suspected geologic hazards and faults in the City. The maps show potential hazards and rates them by relative risk, on a scale from nominal to high. The Seismic Safety Study is intended to serve as a tool to determine the level of geotechnical review to be required by the City for planning, development, or building permits. While the District is not required to follow the City's guidance for further site-specific geotechnical investigations, these generalized maps provide guidance on geologic hazards within the project site.

City of San Diego Land Development Code

The City's Land Development Code sets forth the regulations that apply to the development of land in the City, and comprises Chapters 11, 12, 13, 14, and 15 of the San Diego Municipal Code. Per San Diego Municipal Code Section 129.0602, grading permits are required for any grading within open space easements or City-owned open space; any grading required for the restoration of unauthorized grading; any grading within the Special Flood Hazard Area; any grading in accordance with a Grading Permit required as a condition of a development permit to assure compliance with the development permit conditions; and other specific grading activities based on factors such as slopes, total graded area, or proposed fill content.

San Diego Municipal Code Paleontological Regulations

San Diego Municipal Code Section 142.0151 establishes the following paleontological resources requirements for grading activities:

a) Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

(1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or

(2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or

(3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Land Development Code Section 142.0151(a), all grading in the area of discovery is required to cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the City's General Grading Guidelines for Paleontological Resources.

3.6.3 Thresholds of Significance

Thresholds used to evaluate potential geology and soils impacts are based on CEQA Guidelines Appendix G. A significant geology and soils impact could occur if implementation of the proposed project would:

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

    a. 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;

    b. Strong seismic ground shaking;

    c. Seismic-related ground failure, including liquefaction; or

    d. Landslides;

2. Result in substantial soil erosion or the loss of topsoil;

3. 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;

4. 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;

5. 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; or

6. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

To determine the potential for the project to result in impacts to paleontological resources, the District considered the City's adopted paleontological significance thresholds as appropriate guidance to the evaluation of paleontological resource impacts given the presence of geologic units on campus

consistent with surrounding areas of the City. Two site-specific adjustments to these thresholds were incorporated. As no geologic units assigned a moderate paleontological resource sensitivity are present within the project site, the associated threshold is omitted from the project-specific thresholds. The City also typically uses a 10-foot depth threshold; however, fossils have been recovered in near-surface exposures in the project vicinity so the depth threshold established by the District is based on the depth of artificial fill. Based on the City's guidelines and site-specific adjustments, potential impacts to paleontological resources would be considered significant if the project would:

- Require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit below the depths of documented or undocumented artificial fill or, where this information cannot be determined, more than two feet below grade; or

- Require grading within 100 feet of a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site.

3.6.4 Impact Analysis

3.6.4.1 Seismic Hazards

Threshold 1: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

Impact Discussion

Program-Level

Ground Rupture

Ground surface rupture due to active faulting is possible at the project site due to the presence of active faults associated with the Rose Canyon fault zone described in Section 3.6.1.2 above. Specifically, two Downtown Graben faults traverse the western portion of South Campus near the existing Gorton Quad and Buildings D, A, M, L, R, and C. These faults are associated with a State of California Earthquake Fault Zone (formerly known as a Alquist-Priolo Fault Zone). In addition, the entirety of the project site is located within the City of San Diego Downtown Special Studies Zone for faults. Accordingly, surface fault rupture risk at the site is considered high. Additionally, lurching or cracking of the ground surface as a result of nearby seismic events along other faults is possible.

Due to the fault hazard zones mapped across the site, site-specific fault hazard studies per CGS Special Publication 42 would be required for new structures proposed for human occupancy under the FMP. The potential risk to such future structures would be required to be assessed as part of a comprehensive geotechnical and fault hazard evaluation performed prior to project development and in accordance with CBC Chapter 18A and CGS Note 48, which includes requirements for geotechnical evaluation of public school sites. Conformance to building construction standards and minimum building setbacks for seismic safety within the CBC and the Alquist-Priolo Earthquake Fault Zoning Act would avoid exposure to ground rupture for structures constructed under the FMP. The removal of Building M from the 50-foot buffer surrounding these faults would be considered a beneficial effect of the project. With conformance to applicable CGS and CBC regulations as required by the District Design Guidelines and

Standards, future projects implemented under the FMP would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

Ground Shaking

As discussed in Section 3.6.1.1, strands of the Rose Canyon fault zone are mapped across the western portion of South Campus. Considering the proximity of campus facilities to the Rose Canyon fault zone, which is capable of producing a maximum moment magnitude of 6.9, future buildings constructed under the FMP have a high potential for experiencing strong ground motion. The risk and associated design recommendations for strong ground motion would be required to be evaluated for new structures implemented under the FMP in accordance with CBC Chapter 18A and CGS Note 48. In accordance with Chapter 20 of the American Society of Civil Engineers (ASCE) Publication 7-22 for the Minimum Design Loads and Associated Criteria for Building and Other Structures, the campus classification is Site Class C. However, further evaluation of the Site Class and associated requirements for building construction would be performed as part of the comprehensive geotechnical study prepared for each individual project implemented under the FMP. Project design and construction performed in accordance with the requirements of Chapter 16 of the CBC and the ASCE 7-22 Standard can be expected to avoid risks due to ground shaking for future projects implemented under the FMP.

Ground Failure and Liquefaction

Based on the presence of relatively dense materials and the absence of shallow groundwater at the project site, soils underlying the project site are not considered susceptible to liquefaction. Geotechnical evaluations have previously identified the potential for seismically induced settlements up to approximately 1.25 inches. While liquefaction is not anticipated to be a risk to future development projects, both liquefaction and seismically induced settlement potential would be evaluated as part of the comprehensive geotechnical evaluation performed prior to individual project development under the FMP in accordance with CBC Chapter 18A and CGS Note 48. This evaluation would determine the level of hazard for liquefaction and seismic settlement within the specific project location and, if applicable, provide structural design techniques that are required to be incorporated into the design of the project according to the District Design Guidelines and Standards. Construction methods to reduce hazards from liquefaction and seismic settlement may include, but are not limited to, in-situ ground modification, removal of settlement-sensitive layers and replacement with compacted fill, or support of structures with piles to sufficient depths to avoid damage as a result of liquefaction or seismic settlement. Implementation of the FMP would not directly or indirectly cause substantial adverse effects related to ground failure or liquefaction.

Landslides

As discussed further in Section 3.6.1.2 above, a review of geologic literature, aerial photos, and topographic maps did not indicate the presence of mapped landslides on or adjacent to the project site. The potential for future projects implemented under the FMP to be affected by landslides is therefore considered low, and implementation of the FMP would not directly or indirectly cause substantial adverse effects related to landslides.

Project-Level

Ground Rupture

The near-term projects proposed under the FMP are each within the Downtown Special Fault Zone. The Building A Expansion Project and the Performing Arts Center project sites are additionally each underlain by an active State of California Earthquake Fault Zone. However, with conformance to applicable CGS and CBC regulations for site-specific fault hazard studies, the near-term projects implemented under the FMP would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault.

Ground Shaking

Strands of the Rose Canyon fault zone are mapped across the western portion of South Campus, which includes the Building A Expansion project and the Performing Arts Center project locations. Considering the proximity of all of the near-term projects to the Rose Canyon fault, which is capable of producing a maximum moment magnitude of 6.9, the near-term projects have a high potential for experiencing strong ground motion. As discussed further in the program-level analysis above, the risk and appropriate design recommendations for strong ground motion would be required to be evaluated prior to the issuance of building permits for each of the near-term projects in accordance with Chapter 16 of the CBC and the ASCE 7-22 Standard. Therefore, adherence to applicable CBC and ASCE standards would ensure that the near-term projects would not cause substantial adverse effects associated with ground shaking.

Ground Failure and Liquefaction

Based on the presence of relatively dense materials and absence of shallow groundwater at the campus, soils underlying the near-term project sites are not considered susceptible to liquefaction. Geotechnical evaluation of the campus identified the potential for seismically induced settlements up to approximately 1.25 inches. Liquefaction and seismically induced settlement potential would be evaluated as part of a comprehensive geotechnical evaluation performed prior to issuance of building permits for each of the near-term projects in accordance with CBC Chapter 18A and CGS Note 48. Structural design and construction techniques would be incorporated as applicable. Implementation of the near-term projects under the FMP would not cause substantial adverse effects associated with ground failure or liquefaction.

Landslides

As discussed further under Section 3.6.1.2 above, a review of geologic literature, aerial photos and topographic maps did not indicate the presence of mapped landslides on the campus, and no other landslides were mapped adjacent to the campus. The potential for the near-term projects proposed under the FMP to result in impacts related to landslides is therefore considered low.

Level of Significance Prior to Mitigation

Given adherence to applicable building codes and incorporation of geotechnical study recommendations, future projects implemented under the FMP, including the near-term projects, would not result in substantial adverse effects related to ground rupture, ground shaking, ground failure, or landslides. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.6.4.2 Soil Erosion

Threshold 2: Would the project result in substantial soil erosion or the loss of topsoil?

Impact Discussion

Program-Level

Grading, excavation, demolition, and construction activities associated with the implementation of future projects under the FMP could remove existing stabilizing surfaces and expose topsoil, thereby increasing the potential for erosion. The soil units mapped on the campus include Urban Land and Made Land, which have low to moderate erosion potential. Graded or excavated areas would be stabilized through the installation of hardscape and landscaping once construction is completed; therefore, erosion potential would primarily be a concern during construction activities. Earth-disturbing activities associated with construction would be temporary and the potential for erosion effects would depend largely on the areas disturbed, the quantity of disturbance, and the length of time soils are subject to conditions resulting in erosion. As discussed further in Section 3.9, *Hydrology and Water Quality*, projects proposed under the FMP that would disturb more than one acre would be required to prepare and submit a Notice of Intent and a SWPPP to the RWQCB demonstrating compliance with the NPDES Construction General Permit. For future projects which would disturb less than one acre, the District Guidelines and Standards require a WPCP be developed to manage sediment, materials, waste, and other pollutants and prevent them from entering stormwater. Short-term erosion and sedimentation potential associated with construction activities would be addressed through conformance with the NPDES or WPCP, which require the development of erosion and sedimentation control plans based on individual project site characteristics. The erosion and sedimentation control plan developed for each project would identify the required BMPs to avoid erosion during construction. The final BMPs required during construction would be determined during preparation of a project-specific SWPPPs but would include standard measures such as dust control, waste management, and silt fencing installation. Further, projects implemented under the FMP would be required to comply with the Design Guidelines and Standards Manual which includes earthwork and grading design recommendations to reduce the potential for erosion. As such, with adherence to applicable NPDES permit and District requirements, FMP implementation would not result in substantial erosion or the loss of topsoil.

Project-Level

Implementation of the near-term projects under the FMP would require construction activities that would expose soils and increase the short-term potential for erosion. Once construction is completed, graded or excavated areas of these project sites would be stabilized through the installation of building foundations, hardscape, and landscaping similar to existing conditions. Therefore, there would be no long-term effect related to soil erosion.

The Building A Expansion and North Campus Athletic Fields projects are anticipated to disturb more than one acre each. Therefore, each of these near-term projects would be required to prepare and submit a Notice of Intent and a SWPPP to the RWQCB demonstrating compliance with the NPDES Construction General Permit as discussed in the program-level analysis above. The Performing Arts Center is anticipated to disturb less than one acre would therefore be required to prepare a WPCP. The project-specific SWPPP or WPCP, depending on the final disturbance area, would include site-specific BMP requirements, including dust control, waste management, and silt fencing installation to reduce erosion

potential. With adherence to applicable NPDES permit conditions as well as District requirements for earthwork and grading design and WPCP preparation, the near-term projects proposed under the FMP would not result in substantial erosion or the loss of topsoil.

Level of Significance Prior to Mitigation

With adherence to applicable NPDES permit conditions and District requirements, implementation of the FMP, including the near-term projects, would not result in substantial soil erosion or the loss of topsoil. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.6.4.3 Geologic Instability

Threshold 3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact Discussion

Program-Level

As discussed in Section 3.6.4.1 above, the geologic units underlying the campus are not considered susceptible to landsliding, lateral spreading, subsidence, or liquefaction. However, soils do exist on the campus that may be subject to seismic settlement. Specifically, the loose to medium dense, undocumented fill and alluvium located across campus are susceptible seismic settlements up to approximately 1.25 inches The degree of this hazard at specific project locations across campus would be evaluated in the design-level geotechnical evaluation required prior to individual project development in accordance with CBC Chapter 18A, CGS Note 48, and the District Design Guidelines and Standards Manual. If soil settlement is identified as a potential hazard on an individual project site, appropriate engineering measures would be incorporated during construction as recommended in the design-level geotechnical evaluation or by the project structural engineer. These could include removal and/or replacement of soils with engineered, compacted fill. The FMP would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of being located on an unstable geologic unit.

Project-Level

The near-term projects proposed under the FMP are not proposed on sites susceptible to landsliding, lateral spreading, subsidence, or liquefaction. However, soils do exist on the campus that may be subject to seismic settlement as discussed in the program-level analysis above. The degree of this hazard for each near-term project would be evaluated during the geotechnical evaluation in accordance with CBC Chapter 18A, CGS Note 48, and the District Design Guidelines and Standards Manual. Appropriate engineering measures would be recommended and incorporated into the near-term project construction specifications should soils susceptible to seismic settlement be detected. The near-term projects implemented under the FMP would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of being located on an unstable geologic unit.

Level of Significance Prior to Mitigation

With adherence to applicable recommendations in project-specific geotechnical evaluations, implementation of the FMP, including the near-term projects, would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse as a result of being located on a geologic unit or soil that is unstable. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.6.4.4 Expansive Soil

Threshold 4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact Discussion

Program-Level

The clayey fill soils and old paralic deposits on campus are considered moderately expansive. In addition, the artificial fill on the southeastern portion of campus may contain unsuitable expansive materials that may preclude its use as engineered fill. Soil conditions at future project locations would be further evaluated by geotechnical laboratory testing as part of the required design level geotechnical evaluation performed in accordance with CBC Chapter 18A and CGS Note 48. In addition, projects implemented under the FMP would be required to adhere to the Design Guidelines and Standards Manual, which includes requirements to identify expansive soils and provide treatment strategies as part of the project-specific geotechnical report required for District projects. Such treatment strategies may include the compaction of expansive soils or their removal and replacement with less expansive fill material. Therefore, although expansive soils may exist on the campus, compliance with the CBC, CGS, and District requirements for treatment of expansive soils would ensure that future projects implemented under the FMP would not create a substantial direct or indirect risk to life or property.

Project-Level

The near-term projects proposed under the FMP would be underlain by soils and earth materials expected to have a moderate expansion potential as is the case for the rest of campus. Soil conditions would be further evaluated by geotechnical laboratory testing as part of the design level geotechnical evaluation required for each of the near-term projects. As discussed in the program-level analysis above, this would occur in accordance with CBC Chapter 18A, CGS Note 48, and the Design Guidelines and Standards Manual. Compliance with applicable requirements for expansive soils would ensure that the near-term projects would not create a substantial direct or indirect risk to life or property.

Level of Significance Prior to Mitigation

With compliance with the CBC, CGS, and District requirements for expansive soils, implementation of the FMP, including the near-term projects, would not create substantial direct or indirect risks to life or property as a result of expansive soils. **Program-level and project level impacts would be less than significant**. No mitigation is required.

3.6.4.5 Septic Tanks

Threshold 5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact Discussion

Program-Level

Projects implemented under the FMP would rely on the existing sanitary sewer system within and in the vicinity of campus and would not use septic tanks or alternative wastewater disposal systems. Therefore, the future projects implemented under the FMP would not require soils capable of supporting the use of septic tanks or alternative wastewater disposal systems.

Project-Level

The near-term projects would connect to existing sewer facilities within and surrounding campus; no septic tanks or alternative wastewater disposal systems would be required.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the proposed near-term projects, would not require the use of septic tanks or alternative wastewater disposal systems. There would be **no program-level or project-level impact**. No mitigation is required.

3.6.4.6 Paleontological Resources

Threshold 6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact Discussion

Program-Level

The campus is primarily underlain by geologic units assigned high paleontological resource sensitivity (the Bay Point Formation or San Diego Formation), with some areas additionally underlain at the surface by unmapped geologic units assigned no paleontological resource sensitivity (previously placed fill deposits) or low paleontological resource sensitivity (unmapped Holocene-age alluvium). Excavation activities within previously undisturbed deposits of the Bay Point Formation and San Diego Formation have the potential to result in disturbance of paleontological resources. Refer to Figure 3.6-2, *Paleontological Sensitivity Areas*.

As described in Section 3.6.3 above, a site-specific threshold of significance was developed to assess potential paleontological resource impacts based on guidance from the City's significance determination thresholds. Potential impacts to paleontological resources would be considered significant if a project would require over 1,000 cubic yards of excavation in a high paleontological sensitivity geologic unit at depths below the location of no or low paleontological sensitivity geologic units (or below two feet where this information is unavailable), or if excavation would occur within 100 feet of a previously documented fossil collection locality.

Generally, demolition of existing campus facilities would not require disturbance of previously undisturbed bedrock deposits, as most earthwork associated with demolition is anticipated to affect previously placed artificial fill that was imported during original construction of such campus facilities. Interior renovations and most minor construction occurring at existing campus buildings would also be unlikely to result in disturbance to paleontological resources in previously undisturbed soils, though the specific details of each project would be evaluated on a case-by-case basis using the project specific thresholds. Construction of replacement facilities within the campus is anticipated to involve ground disturbing activities such as grading, excavation, trenching, and other work that would disturb soil units with high paleontological sensitivity. Therefore, implementation of the FMP has the potential to directly or indirectly destroy unique paleontological resources.

Project-Level

Building A Expansion

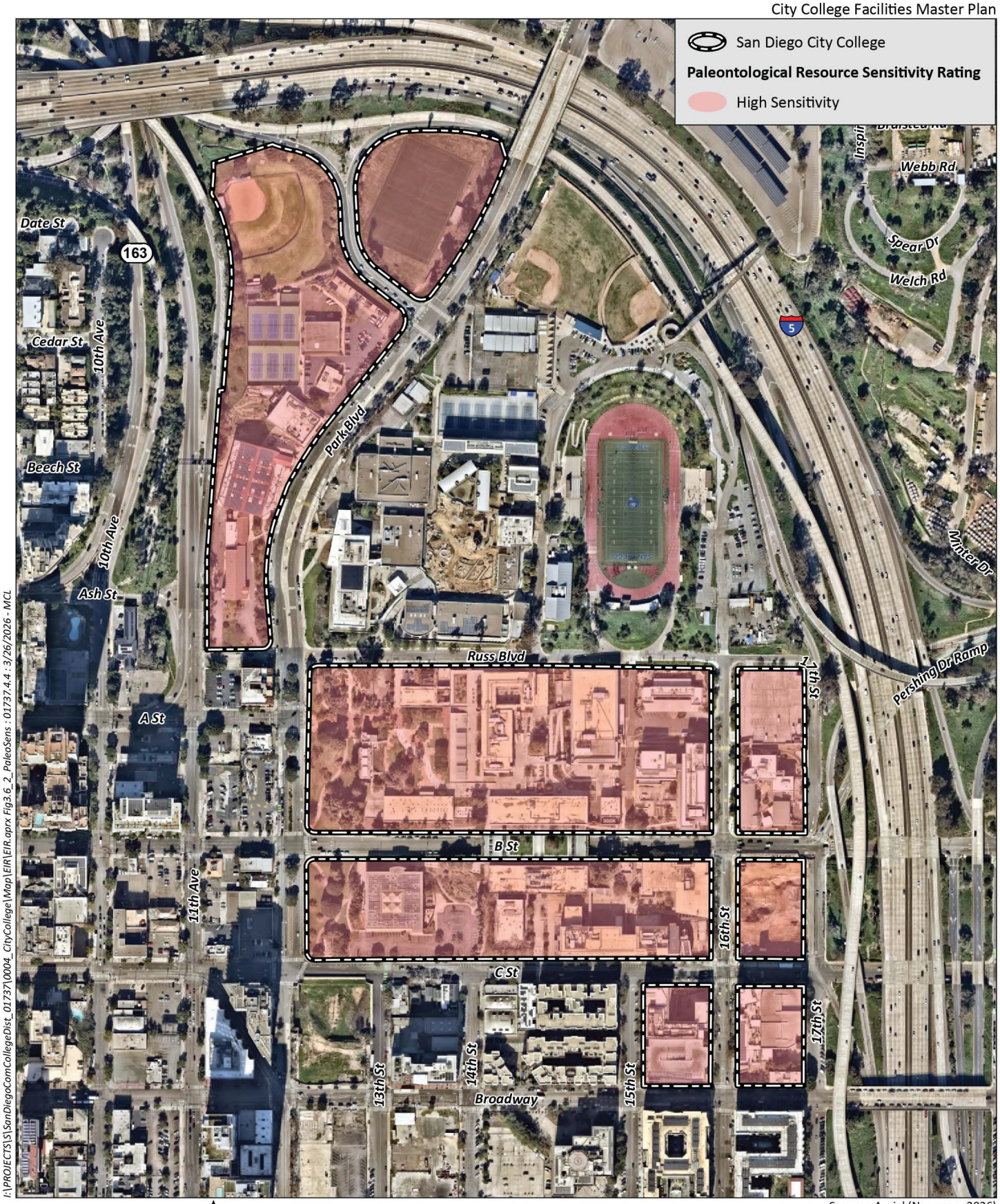
Existing Buildings A and D, where the Building A Expansion project would be constructed, are underlain by approximately 5 feet of undocumented artificial fill, which is in turn is underlain by strata of the San Diego Formation. Demolition of Building D and removal of site utilities are anticipated to primarily affect the upper layers of previously placed artificial fill, and are therefore considered unlikely to affect undisturbed deposits of the San Diego Formation. However, construction of the Building A Expansion project, including activities such as grading and utility replacement, are anticipated to affect previously undisturbed deposits of the San Diego Formation below existing artificial fill. Therefore, construction of the Building A Expansion project has the potential to disturb paleontological resources.

Performing Arts Center

The Performing Arts Center project site is underlain by strata of the San Diego Formation and previously placed artificial fill associated with facility construction. Demolition of the Saville Theatre and removal of site utilities are anticipated to primarily affect the upper layers of previously placed artificial fill and are therefore considered unlikely to affect previously undisturbed deposits of the San Diego Formation. However, construction of the new Performing Arts Center, including activities such as grading and utility replacement, are anticipated to affect previously undisturbed deposits of the San Diego Formation below existing artificial fill. Therefore, construction of the Performing Arts Center project has the potential to disturb paleontological resources.

North Campus Athletic Fields

The North Campus Athletic Fields project site is underlain by strata of the San Diego Formation and it is assumed that previously placed artificial fill associated with construction of the fields and facilities is likely present. Demolition and removal of existing landscaping/hardscaping and facilities are anticipated to primarily affect the upper layers of previously placed artificial fill and are therefore considered unlikely to affect previously undisturbed deposits of the San Diego Formation. However, excavation associated with construction of the new sand volleyball courts, athletic fields, and associated structures could affect previously undisturbed deposits of the San Diego Formation, depending on the depth and location of planned excavations and the presence of previously placed artificial fill. Therefore, construction of the North Campus Athletic Fields project has the potential to result in impacts to paleontological resources.



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0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Paleontological Sensitivity Areas

Figure 3.6-2

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, has the potential to disturb paleontological resources. **Program-level and project-level impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

The following mitigation measures apply to future FMP projects located in high paleontological resource sensitivity areas (refer to Figure 3.6-2).

GEO-1 Initial Project Review. Project grading plans shall be reviewed by the District or its Designated Representative(s) to determine the total cut volume associated with construction of the project. If available, a project-specific geotechnical investigation report shall be consulted to determine where and at what depths the Bay Point Formation or San Diego Formation would be impacted. In the absence of site-specific geotechnical data, it should be assumed that unweathered deposits of the Bay Point Formation or San Diego Formation are present at depths of 2 feet or more below existing grade. Finally, an updated paleontological records search shall be requested from the SDNHM to determine whether there are documented fossil collection localities present within or within 100 feet of the site.

Based on the results of the above review, one of the following scenarios shall apply:

- If the total cut volume exceeds 1,000 cubic yards and excavation would exceed the project-specific depth threshold determined above, implementation of GEO-2 and GEO-3 shall be required (provided below).
- If the total cut volume is less than 1,000 cubic yards and excavation would exceed the project-specific depth threshold determined above and the project occurs on or within 100 feet of an existing fossil locality, implementation of GEO-2 and GEO-3 shall be required (provided below).
- If the total cut volume exceeds 1,000 cubic yards and excavation would not exceed the project-specific depth threshold determined above (regardless of proximity to existing fossil localities), no additional mitigation is necessary.
- If the total cut volume is less than 1,000 cubic yards and the project does not occur on or within 100 feet of an existing fossil collection locality (regardless of excavation depth), no additional mitigation is necessary.

GEO-2 Monitoring. Prior to the commencement of construction, a qualified Project Paleontologist shall be retained by the District or its Designated Representative(s) to oversee the mitigation program (a Project Paleontologist is a person with a Ph.D. or Master's Degree in Paleontology or related field, and who has knowledge of San Diego County paleontology and documented experience in professional paleontological procedures and techniques). In addition, a regional fossil repository shall be designated to receive discovered fossils (because the project is in the County of San Diego, the recommended repository is the San Diego Natural History Museum).

The Project Paleontologist shall review available geotechnical data and project construction plans prior to the start of monitoring to determine precisely where and at what depths paleontological monitoring should occur.

The Project Paleontologist or a designated representative shall attend the Project pre-construction meeting to consult with the grading and excavation contractors and environmental and engineering staff concerning excavation schedules, paleontological monitoring requirements and field techniques, and safety issues.

A paleontological monitor (working under the direction of the Project Paleontologist) shall be on-site on a full-time basis during all earthwork impacting previously undisturbed deposits of the Bay Point Formation or San Diego Formation to inspect exposures for unearthed fossils. Monitoring should include testing for the presence of microfossils, which can be accomplished by collecting and screenwashing test samples of potentially fossil-bearing sediment, as deemed appropriate by the Project Paleontologist. Monitoring may be reduced or terminated at the discretion of the Project Paleontologist based on the results of initial monitoring.

GEO-3 Treatment of Fossil Discoveries. If fossils are discovered, the Project Paleontologist (or paleontological monitor) shall evaluate their significance, document, and recover them. In most cases, fossil recovery can be completed in a short period of time. However, some fossil specimens (e.g., a partial or complete large mammal skeleton) may require an extended salvage period. In these instances, the Project Paleontologist (or paleontological monitor) has the authority to temporarily direct, divert, or halt earthwork within 50 feet of the discovery site to allow recovery of fossil remains in a timely manner.

Fossil remains collected during monitoring and salvage shall be cleaned, repaired, sorted, identified, and catalogued as part of the mitigation program. Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall be deposited (as a donation) in the designated fossil repository. Fossils shall be deposited in the designated fossil repository within 90 days of completion of monitoring unless the Project Paleontologist determines that more time is required to prepare, stabilize, and/or curate the recovered fossils and communicates this revised timeline to the District and the designated fossil repository. Donation of the fossils shall be accompanied by financial support for initial specimen storage, provided by the District or its Designated Representative(s).

If fossils were discovered and salvaged during monitoring, an expanded summary report shall be prepared in place of the abbreviated summary report required under GEO-2. The report shall detail the results of the mitigation program, and shall include discussions of the methods used, stratigraphic section(s) exposed, recovered fossils and their significance, and an inventory list of catalogued fossils. The summary report shall be submitted to the designated fossil repository and to the District to signal completion of the mitigation program.

GEO-4 Inadvertent Fossil Discoveries. If fossils are discovered during construction when a paleontological monitor is not on site (i.e., during earthwork that was not anticipated to encounter paleontological resources), a 50-foot buffer shall be established around the discovery site and work shall cease in this area. The construction contractor shall contact the District and the District shall contact a qualified Project Paleontologist to evaluate the discovery and its significance. The Project Paleontologist shall recommend whether further mitigation (i.e.,

monitoring of remaining earthwork and treatment of the fossil discovery, as outlined in GEO-2 and GEO-3) is required. The Project Paleontologist shall document their recommendation in a memo submitted to the District, after which work may resume in the location of the discovery.

Project-Level

Mitigation measures GEO-1 and GEO-4 would apply to construction of the near-term projects proposed under the FMP. Depending on the results of initial project review in mitigation measure GEO-1, mitigation measures GEO-2, and GEO-3 may also be required.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measures GEO-1 through GEO-4 would reduce program-level impacts to paleontological resources to a level that is **less than significant**.

Project-Level

Implementation of mitigation measures GEO-1 through GEO-4, as applicable, would reduce project-level impacts to paleontological resources to a level that is **less than significant**.

3.6.5 Cumulative Impact Analysis

Impacts related to geology and soils are generally site-specific, as risks associated with geologic settings in one location do not result in associated geologic failure elsewhere. Therefore, the geographic area for the analysis of cumulative impacts related to geology and soils consists of properties adjacent to the City College campus, except for impacts related to erosion and paleontological resources. The geographic area for the cumulative impacts analysis related to erosion would be the HA for the project site (San Diego Mesa HA), while the geographic area for cumulative impacts related to the regional loss of paleontological resources would be the City.

3.6.5.1 Seismic Hazards

Cumulative development projects would be sited within an area subject to seismic activity similar to the project site. Some of the cumulative projects would locate structures where there is potential for adverse effects including risk of loss, injury, or death due to rupture of a known earthquake fault, strong seismic ground shaking, liquefaction, or landslides. However, projects that could be exposed to these geologic hazards would be required to prepare project-specific geotechnical and/or soil investigations, and potential hazards would be avoided through incorporation of site-specific recommendations for design and construction. Projects proposed adjacent to the campus would be within the City and therefore be required to comply with applicable San Diego Municipal Code requirements, in addition to CBC regulations. Compliance with site-specific recommendations and state and local regulations would avoid the potential for cumulative impacts concerning seismic hazards. As projects implemented under the FMP would also incorporate these geotechnical recommendations during construction of individual projects, cumulative impacts would be **less than significant**.

3.6.5.2 Soil Erosion

Similar to the proposed FMP, cumulative development projects could also involve construction activities that result in temporary soil erosion or loss of topsoil. However, like projects implemented under the FMP, cumulative projects which would disturb more than one acre would be required to prepare and submit a Notice of Intent and a SWPPP to the RWQCB demonstrating compliance with the NPDES Construction General Permit and implement BMPs outlined in the associated erosion and sedimentation control plan. For projects under one acre in the City, a WPCP with site-specific construction stormwater BMPs would be prepared and submitted to the City for approval. Once operational, graded or excavated areas would be stabilized through the installation of hardscape and landscaping similar to the FMP projects. As such, cumulative impacts related to soil erosion would be **less than significant**.

3.6.5.3 Geologic Instability

Similar to the proposed FMP, cumulative development projects would be required to adhere to applicable recommendations in project-specific geotechnical evaluations related to on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse risks as a result of being located on located on a geologic unit or soil that is unstable. Cumulative development could be sited within an area subject to geologic instability, but with implementation of applicable design recommendations to ensure no substantial impacts related to geologic instability occur, their impacts would be less than significant similar to the FMP. As such, cumulative impacts would be **less than significant**.

3.6.5.4 Expansive Soil

Cumulative development projects would be required to comply with the CBC, CGS, and local requirements for expansive soils, similar to the FMP, and would therefore not create substantial direct or indirect risks to life or property as a result of expansive soils. Therefore, cumulative impacts related to expansive soil would be **less than significant**.

3.6.5.5 Septic Tanks

Similar to projects proposed under the FMP, cumulative projects are anticipated to rely on the existing sanitary sewer system that serves the downtown San Diego area and would not use septic tanks or alternative wastewater disposal systems. Should cumulative projects require the use of septic tanks or alternative wastewater disposal systems, an analysis of on-site soils would be required to ensure that the specific site can adequately support these systems. As such, implementation of the FMP in combination with cumulative development would not require soils supporting septic tanks or alternative wastewater systems and cumulative impacts would be **less than significant**.

3.6.5.6 Paleontological Resources

As discussed in Section 3.6.4.6, the City College campus is underlain by geologic units with high paleontological sensitivity, and projects proposed in these areas would be required to follow the mitigation framework outlined in mitigation measures GEO-1 through GEO-4. Some cumulative projects could also require excavation at depths and within geologic units that could expose or damage paleontological resources. However, these projects would be required to comply with San Diego Municipal Code Section 142.0151 (Paleontological Regulations), which addresses potential impacts to paleontological resources through construction monitoring programs and treatment and/or curation requirements for discovered fossils similar to the mitigation framework outlined for the FMP. With the

implementation of such mitigation measures and adherence to City regulations, cumulative impacts to paleontological resources from the identified cumulative projects would be considered **less than significant**.

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3.7 Greenhouse Gas Emissions

This section addresses the potential greenhouse gas (GHG) emissions impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to GHG emissions are also addressed. This section relies on the information and analysis in the Air Quality and Greenhouse Gas Emissions Technical Report (HELIX 2026), provided as Appendix B to the PEIR.

3.7.1 Environmental Setting

3.7.1.1 Climate Change Overview

Global climate change refers to changes in average climatic conditions on Earth, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by atmospheric gases. These gases are commonly referred to as GHGs because they function similar to a greenhouse by letting sunlight in but preventing heat from escaping, thus warming the Earth's atmosphere.

GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with: (1) the burning of fossil fuels during motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition.

The National Aeronautics and Space Administration (NASA) temperature records show a decades-long trend of warming, indicating that 2024 was the warmest year on record since 1880, with global temperatures approximately 2.3 degrees Fahrenheit (°F; or about 1.28 degrees Celsius) warmer than the twentieth century baseline (1951 through 1980) and 2.65°F (1.47 degrees Celsius) warmer than the late nineteenth century (1850 through 1900) preindustrial average (NASA 2025). The 10 most recent years (2014 through 2024) have been the warmest on record (NASA 2025). GHG emissions from human activities are the most significant driver of observed climate change since the mid-twentieth century (United Nations Intergovernmental Panel on Climate Change [IPCC] 2014). The IPCC constructed several emission trajectories of GHGs needed to stabilize global temperatures and climate change impacts. The statistical models show a "high confidence" that the global temperature increase caused by anthropogenic GHG emissions could be kept to less than two degrees Celsius relative to pre-industrial levels if atmospheric concentrations are stabilized at about 450 parts per million (ppm) carbon dioxide equivalent (CO_2e) by the year 2100 (IPCC 2014).

3.7.1.2 Greenhouse Gases of Primary Concern

The GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Although water vapor is the most abundant and variable GHG in the atmosphere, it is not considered a pollutant; it maintains a climate necessary for life.

Carbon Dioxide. CO_2 is the most important and common anthropogenic GHG. CO_2 is an odorless, colorless GHG. Natural sources include the decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungi; evaporation from oceans; and volcanic outgassing. Anthropogenic sources of CO_2 include burning fuels, such as coal, oil, natural gas, and wood. Data from ice cores indicate that CO_2 concentrations remained steady prior to the current period of anthropogenic

influences for approximately 10,000 years. The atmospheric CO_2 concentration in 2010 was 390 ppm, 39 percent above the concentration at the start of the Industrial Revolution (about 280 ppm in 1750). As of February 2026, the CO_2 concentration exceeded 429 ppm, an approximately 53 percent increase since 1750 (National Oceanic and Atmospheric Administration [NOAA] 2026).

Methane. CH_4 is a gas and is the main component of natural gas used in homes. A natural source of CH_4 is the decay of organic matter. Geological deposits known as natural gas fields contain CH_4, which is extracted for fuel. Other sources are from the decay of organic material in landfills, fermentation of manure, and cattle digestion.

Nitrous Oxide. N_2O is produced by both natural and human-related sources. N_2O is emitted during agricultural and industrial activities, as well as during the combustion of fossil fuels and solid waste. Primary human-related sources of N_2O are agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuel, adipic (fatty) acid production, and nitric acid production.

Fluorocarbons. Fluorocarbons are gases formed synthetically by replacing all hydrogen atoms in CH_4 or ethane with chlorine and/or fluorine atoms. Chlorofluorocarbons are nontoxic, nonflammable, insoluble, and chemically nonreactive in the troposphere (the level of air at Earth's surface). Chlorofluorocarbons were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. They destroy stratospheric ozone; therefore, their production was stopped as required by the Montreal Protocol. PFCs and HFCs are synthetic gases used primarily to replace chlorofluorocarbons in similar types of uses while preventing ozone destruction; however, these gases have long atmospheric lifetimes.

Sulfur Hexafluoride. SF_6 is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Global Warming Potential

GHGs have long atmospheric lifetimes that range from one year to several thousand years. Long atmospheric lifetimes allow for GHG emissions to disperse around the globe. Because GHG emissions vary widely in the power of their climatic effects, climate scientists have established a unit called global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO_2. For example, because methane and N_2O are approximately 25 and 298 times more powerful than CO_2, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 25 and 298, respectively (CO_2 has a GWP of 1). CO_2e is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to quantify CO_2e.

To comply with international reporting standards under the United Nations Framework Convention on Climate Change, official emission estimates for California and the U.S. are reported using AR4 GWP values (IPCC 2007). By applying the GWP ratios, CO_2e emissions can be tabulated in metric tons (MT) per year. Typically, the GWP ratio corresponding to the warming potential of CO_2 over a 100-year period is used as a baseline. The atmospheric lifetime and GWP of selected GHGs are summarized in Table 3.7-1, *Global Warming Potentials and Atmospheric Lifetimes*. As shown in Table 3.7-1, the GWP for common GHGs ranges from 1 (CO_2) to 22,800 (SF_6).

Table 3.7-1
GLOBAL WARMING POTENTIALS AND ATMOSPHERIC LIFETIMES

Greenhouse Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO_2)	50-200	1
Methane (CH_4)	12	25
Nitrous Oxide (N_2O)	114	298
HFC-134a	14	1,430
PFC: Tetrafluoromethane (CF_4)	50,000	7,390
PFC: Hexafluoroethane (C_2F_6)	10,000	12,200
Sulfur Hexafluoride (SF_6)	3,200	22,800

Source: IPCC 2007
HFC = hydrofluorocarbon; PFC = perfluorocarbon

3.7.1.3 Greenhouse Gas Inventories

Worldwide and National Greenhouse Gas Inventory

In 2023, total anthropogenic GHG emissions worldwide were estimated at 50,800 million metric tons (MMT) of CO_2e emissions (Climate Watch 2023). The five largest emitting countries together account for about 52 percent of total global GHG emissions: China (26 percent), the U.S. (11 percent), India (8 percent), Brazil (4 percent), and Indonesia (3 percent). These countries also have the highest CO_2 emission levels (Climate Watch 2023).

Per the U.S. Environmental Protection Agency (USEPA) Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2022, total U.S. GHG emissions were approximately 6,343.2 MMT CO_2e in 2022 (USEPA 2024). The primary GHG emitted by human activities in the U.S. was CO_2, which represented approximately 79.7 percent of total GHG emissions (5,053 MMT CO_2e). The largest source of CO_2, and of overall GHG emissions, was fossil fuel combustion, which accounted for approximately 93 percent of gross CO_2 emissions in 2022 (4,699.4 MMT CO_2e). Relative to 1990, gross U.S. GHG emissions in 2022 were lower by 3.0 percent, down from a high of 15.2 percent above 1990 levels in 2007. Gross emissions increased from 2021 to 2022 by 0.2 percent (14.4 MMT CO_2e). Net emissions (i.e., including sinks) were 5,489 MMT CO_2e in 2022. Overall, net emissions increased by 1.3 percent from 2021 to 2022 and decreased by 16.7 percent from 2005 levels. Between 2021 and 2022, the increase in total GHG emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion across most end-use sectors due in part to increased energy use from the continued rebound of economic activity after the height of the COVID-19 pandemic (USEPA 2024).

State Greenhouse Gas Inventory

The California Air Resources Board (CARB) performed statewide GHG inventories for the years 1990 to 2023, as shown in Table 3.7-2, *California State GHG Emissions by Sector*. The inventory is divided into seven broad sectors of economic activity: agriculture, commercial and residential, electricity generation, high GWP, industrial, recycling and waste, and transportation (CARB 2026a). For comparison, the 1990 baseline inventory for AB 32 is also shown in Table 3.7-2 (CARB 2007).

Table 3.7-2
CALIFORNIA STATE GHG EMISSIONS BY SECTOR

Sector	Emissions (MMT CO_2e)			
	1990	2000	2010	2023
Agriculture	18.9 (4%)	32.3 (7%)	33.7 (8%)	29.2 (8%)
Commercial and Residential	44.1 (10%)	44.8 (10%)	46.3 (11%)	43.3 (12%)
Electricity Generation	110.5 (26%)	104.7 (23%)	90.3 (21%)	57.2 (16%)
High Global Warming Potential	-	6.6 (1%)	13.8 (3%)	21.4 (6%)
Industrial	105.3 (24%)	86.6 (19%)	82.4 (19%)	66.9 (19%)
Recycling and Waste	-	7.1 (2%)	7.9 (2%)	8.6 (2%)
Transportation	150.6 (35%)	176.5 (38%)	161.9 (37%)	133.7 (37%)
Unspecified Remaining	1.3 (<1%)	0.0 (0%)	0.0 (0%)	0.0 (0%)
Total	**430.7**	**458.7**	**436.2**	**360.4**

Source: CARB 2007; CARB 2026a
MMT = million metric tons; CO_2e = carbon dioxide equivalent

As shown in Table 3.7-2, statewide GHG source emissions totaled 430.7 MMT CO_2e in 1990, 458.7 MMT CO_2e in 2000, 436.2 MMT CO_2e in 2010, and 360.4 MMT CO_2e in 2023. Transportation-related emissions consistently contribute the most GHG emissions, followed by industrial and electricity generation emissions.

Existing Campus Greenhouse Gas Emissions

GHG emissions associated with existing campus development were estimated using the California Emissions Estimator Model (CalEEMod) as further described in Section 3.7.4.1. Emission sources were modeled based on the methodology outlined in Section 4.1 of Appendix B. Table 3.7-3, *Existing Operational GHG Emissions,* shows the model-calculated GHG emissions associated with the existing uses at the project site modeled for the FMP buildout year (2045). The model additionally included the 2045 adjustment factors published by CARB for the on-road vehicle (mobile source) exhaust emissions to account for legislative updates. CalEEMod output files for existing conditions are included in Appendix A, *Existing Campus CalEEMod Output*, of Appendix B to the PEIR.

Table 3.7-3
EXISTING OPERATIONAL GHG EMISSIONS

Emission Sources	Existing Emissions (MT CO_2e)
Mobile	4,970.2
Area	19.6
Energy	1,617.3
Water/Wastewater	20.2
Solid Waste	401.6
Refrigerants	0.6
TOTAL[1]	**7,029.5**

Source: HELIX 2026
[1] Totals may not sum due to rounding.
MT = metric tons; CO_2e = carbon dioxide equivalent

3.7.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to GHG emissions is provided below.

3.7.2.1 Federal

Federal Clean Air Act

The U.S. Supreme Court ruled on April 2, 2007, in *Massachusetts v. U.S. Environmental Protection Agency* that CO_2 is an air pollutant, as defined under the federal Clean Air Act (CAA), and that the USEPA has the authority to regulate emissions of GHGs. The USEPA then established the Endangerment Finding in 2009, concluding that GHGs (including CO_2, CH_4, N_2O, HFC, PFC, and SF_6) threaten the public health and welfare of the American people (USEPA 2026). This action was a prerequisite to finalizing the USEPA's GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the U.S. Department of Transportation's (USDOT's) National Highway Traffic Safety Administration.

On June 30, 2022, the U.S. Supreme Court decision published in *West Virginia v. U.S. Environmental Protection Agency* overturned the USEPA's Clean Power Plan rule which cited Section 111(d) of the federal CAA for authority to set limits on CO_2 emissions from existing coal- and natural-gas-fired power plants. The June 30, 2022 decision does not overturn the April 2, 2007 decision; however, it may limit the USEPA's authority to develop rules limiting GHG emissions without clear congressional authorization.

On February 12, 2026, the USEPA rescinded the 2009 Endangerment Finding, thus removing the federal obligation to regulate pollutants such as CO_2, CH_4, N_2O, HFC, PFC, and SF_6 that had previously been identified as potential threats to public health and welfare. Litigation remains ongoing; however, the recission may further restrict the USEPA's ability to implement existing and future regulations limiting GHG emissions. Regardless of these federal regulatory changes, California retains independent authority to establish goals for GHG emissions reduction and regulate GHG emissions from certain sources under state law, as described in Section 3.7.2.2, below.

Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards

The USEPA and the National Highway Traffic Safety Administration worked together on developing a national program of regulations to reduce GHG emissions and improve fuel economy of light-duty vehicles. The USEPA established the first-ever national GHG emissions standards under the federal CAA, and the National Highway Traffic Safety Administration established Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. On April 1, 2010, the USEPA and National Highway Traffic Safety Administration announced a joint Final Rulemaking that established standards for 2012 through 2016 model year vehicles. This was followed up on October 15, 2012, when the agencies issued a Final Rulemaking with standards for model years 2017 through 2025.

In December 2021, USEPA issued a new rule formally adopting standards previously proposed in August 2021 for model years 2023 and 2024 and finalizing more stringent standards than previously proposed for model years 2025 and 2026. The rule assumes a 17 percent electric vehicle (EV) market penetration by 2026. Although this is a departure from the National Highway Traffic Safety Administration CAFE standards, USEPA did coordinate with National Highway Traffic Safety

Administration during the development of the new standards. On March 20, 2024, USEPA announced new, more ambitious final standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027. The final standards build upon USEPA's final standards for federal GHG emissions standards for passenger cars and light trucks for model years 2023 through 2026 and leverages advances in clean car technology to result in benefits to Americans ranging from reducing climate pollution, to improving public health, to saving drivers money through reduced fuel and maintenance costs. The standards would phase in over model years 2027 through 2032.

3.7.2.2 State

Given the wide range of GHG-related policies enacted by the State of California, the statewide GHG emissions regulatory framework is summarized below by category: state climate change targets, renewable energy and energy procurement, mobile sources, solid waste, water, and other state regulations and goals. Refer to Section 3.5, *Energy*, for discussion of regulations related to building energy. The following describes executive orders (EOs), legislation, regulations, and other plans and policies that would directly or indirectly reduce GHG emissions and/or address climate change issues.

State Climate Change Targets

Executive Order S-3-05

On June 1, 2005, EO S-3-05 proclaimed that California is vulnerable to climate change impacts. It declared that increased temperatures could reduce snowpack in the Sierra Nevada mountain range, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To avoid or reduce climate change impacts, EO S-3-05 calls for a reduction in GHG emissions to year 2000 levels by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. EOs are not laws and can only provide the governor's direction to state agencies to act within their authority. Therefore, legislation is required to enact the goals of EO S-3-05 and establish frameworks for statewide implementation. AB 32, described below, mandated the 2020 GHG emissions reduction goal of EO S-3-05. The 2050 GHG emissions reduction goal of EO S-3-05 has not been enacted by any legislation and remains only a goal of the EO.

Assembly Bill 32 – Global Warming Solution Act of 2006

The California Global Warming Solutions Act of 2006 (AB 32 and Health and Safety Code Sections 38500, 38501, 28510, 38530, 38550, 38560, 38561-38565, 38570, 38571, 38574, 38580, 38590, 38592-38599), widely known as AB 32, requires that CARB develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB is directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill requires CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 enacted the year 2020 GHG emission goals of EO S-3-05.

Executive Order B-30-15

On April 29, 2015, EO B-30-15 established a California GHG emission reduction target of 40 percent below 1990 levels by 2030. The EO aligns California's GHG emission reduction targets with those of leading international governments, including the 28-nation European Union. The emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the goal established by

EO S-3-05 of reducing emissions 80 percent under 1990 levels by 2050. Senate Bill (SB) 32, described below, mandates the 2030 GHG emission reduction goals of EO B-30-15.

Senate Bill 32

SB 32 (Amendments to the California Global Warming Solutions Action of 2006) extends California's GHG reduction programs beyond 2020. SB 32 amended the Health and Safety Code to include Section 38566, which contains language to authorize CARB to achieve a statewide GHG emission reduction of at least 40 percent below 1990 levels by no later than December 31, 2030. SB 32 codified the targets established by EO B-30-15 for 2030, which set the next interim step in the state's continuing efforts to pursue the long-term target expressed in EO B-30-15 of 80 percent below 1990 emissions levels by 2050.

Assembly Bill 1279

Approved by Governor Newsom on September 16, 2022, AB 1279, *The California Climate Crisis Act*, declares it the policy of the state to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels. AB 1279 anticipates achieving these policies through direct GHG emissions reductions, removal of CO_2 from the atmosphere (carbon capture), and almost complete transition away from fossil fuels.

Senate Bill 905

SB 905, *Carbon sequestration: Carbon Capture, Removal, Utilization, and Storage Program*, also approved by Governor Newsom on September 16, 2022, requires CARB to establish a Carbon Capture, Removal, Utilization, and Storage Program to evaluate the efficacy, safety, and viability of carbon capture, utilization, or storage technologies and CO_2 removal technologies and facilitate the capture and sequestration of CO_2 from those technologies, where appropriate. SB 905 is an integral part of achieving the state policies mandated in AB 1279.

California Air Resources Board Scoping Plan

The Scoping Plan is a strategy CARB develops and updates at least once every five years, as required by AB 32. It lays out the transformations needed across society and the economy to reduce emissions and reach established climate targets. The current 2022 Scoping Plan is the third update to the original plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 mandate of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below a business as usual scenario. The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for using multiple tools to meet California's GHG emissions targets. The 2013 Scoping Plan assessed progress toward achieving the 2020 mandate and made the case for addressing short-lived climate pollutants. The 2017 Scoping Plan also assessed the progress toward achieving the 2020 limit and provided a technologically feasible and cost-effective path to achieving the SB 32 mandate of reducing GHGs by at least 40 percent below 1990 levels by 2030.

On December 15, 2022, CARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). 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 actions and outcomes in the plan would achieve significant reductions in fossil fuel combustion by deploying clean technologies and fuels; further reductions in short-lived climate pollutants; support for sustainable development; increased action on natural and working lands to reduce emissions and sequester carbon; and the capture and storage of carbon (CARB 2022).

Renewable Energy and Energy Procurement

Senate Bill 1078

SB 1078 (Sher) (September 2002) established the Renewable Portfolio Standard (RPS) program, which required an annual increase in renewable energy generation by the utilities equivalent to at least 1 percent of sales, with an aggregate goal of 20 percent by 2017. This goal was subsequently revised as described below.

Senate Bill 1368

SB 1368 (September 2006) required the California Energy Commission (CEC) to develop and adopt regulations for GHG emission performance standards for the long-term procurement of electricity by local, publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC).

Executive Order S-14-08

EO S-14-08 (November 2008) focused on the contribution of renewable energy sources to meet the electrical needs of California while reducing the GHG emissions from the electrical sector. This EO required that all retail suppliers of electricity in California serve 33 percent of their load with renewable energy by 2020. Furthermore, the EO directed state agencies to take appropriate actions to facilitate reaching this target. The California Natural Resources Agency (CNRA), through collaboration with the CEC and California Department of Fish and Wildlife (CDFW; formerly the California Department of Fish and Game), was directed to lead this effort.

Executive Order S-21-09 and Senate Bill X1-2

EO S-21-09 (September 2009) directed CARB to adopt a regulation consistent with the goal of EO S-14-08 by July 31, 2010. CARB was further directed to work with the CPUC and CEC to ensure that the regulation builds upon the RPS program and was applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB was to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs or impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB initially approved regulations to implement a Renewable Electricity Standard. However, this regulation was not finalized because of subsequent legislation (SB X1-2, Simitian, statutes of 2011) signed by Governor Brown in April 2011.

SB X1-2 expanded the RPS by establishing a renewable energy target for the total electricity sold to retail customers in California per year of 20 percent by December 31, 2013, and 33 percent by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation (30 megawatts [MWs] or less), digester gas, municipal solid waste conversion,

landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location.

SB X1-2 applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must meet the renewable energy goals previously listed.

Senate Bill 350

SB 350 (October 2015, Clean Energy and Pollution Reduction Act) further expanded the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year being from renewable sources by December 31, 2030. In addition, SB 350 included the goal to double the energy efficiency savings in electricity and natural gas final end uses (e.g., heating, cooling, lighting, or class of energy uses on which an energy-efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. Regarding mobile sources, SB 350 establishes California Public Utilities Code Section 740.12, which involves a statewide policy for widespread electrification of the transportation sector, recognizing that such electrification is required for the achievement of the state's 2030 and 2050 GHG emission reduction targets.

Senate Bill 100

SB 100 (2018) increased the renewable energy standards set forth in SB 350, establishing that of the total electricity sold to retail customers in California per year, 44 percent by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, be secured from qualifying renewable energy sources. SB 100 states that it is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 100 percent of the retail sales of electricity to California by 2045. This bill also requires that the achievement of 100 percent zero-carbon electricity resources does not increase carbon emissions elsewhere in the western grid and that the achievement does not occur through resource shuffling.

Senate Bill 1020

SB 1020 (September 2022) revises the standards from SB 100, requiring the following percentage of retail sales of electricity to California end-use customers to come from eligible renewable energy resources and zero-carbon resources:90 percent by December 31, 2035; 95 percent by December 31, 2040; and 100 percent by December 31, 2045.

Mobile Sources

Assembly Bill 1493 and Advanced Clean Cars

AB 1493 (Pavley) requires that CARB develop and adopt regulations that achieve "the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty truck and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State." On September 24, 2009, CARB adopted amendments to the Pavley regulations that intended to reduce GHG emissions in new passenger vehicles from 2009 through 2016. The amendments bind California's enforcement of AB 1493 (starting in 2009), while providing vehicle manufacturers with new compliance

flexibility. The amendments also prepared California to merge its rules with the federal CAFE rules for passenger vehicles (CARB 2026b).

In January 2012, CARB approved Advanced Clean Cars I, a new emissions-control program for model years 2017 through 2025 including low emissions vehicle and zero-emissions vehicle criteria. The Advanced Clean Cars II regulations were adopted in 2022, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026 through 2035 that contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality targets.

On May 22, 2025, the U.S. Congress voted to eliminate the USEPA waivers for California's Advanced Clean Trucks and Heavy-Duty Omnibus regulations. Similarly, on June 12, 2025, President Donald Trump signed a Congressional Review Act resolution to revoke CARB's waivers for Advanced Clean Cars II. Immediately after President Trump signed the resolutions, California's Attorney General Rob Bonta, along with Governor Gavin Newsom and a coalition of 10 other states, sued the Trump administration. The lawsuit is still pending. Governor Newsom also signed EO N-27-25, calling on CARB to develop an Advanced Clean Cars III regulation if the federal disapproval of the Advanced Clean Cars II, Advanced Clean Trucks, and Heavy-Duty Omnibus regulations is not invalidated in court.

Executive Order S-01-07

EO S-01-07, signed by Governor Schwarzenegger on January 18, 2007, directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by the year 2020. It ordered a Low Carbon Fuel Standard (LCFS) for transportation fuels to be established for California and directed CARB to determine whether a LCFS could be adopted as a discrete early action measure pursuant to AB 32. CARB approved the LCFS as a discrete early action item with a regulation adopted and implemented in April 2010. Although challenged in 2011, the Ninth Circuit Court of Appeals reversed the District Court's opinion and rejected arguments that implementing a LCFS violates the interstate commerce clause in September 2013. CARB, therefore, is continuing to implement the LCFS statewide.

Senate Bill 375

SB 375, the Sustainable Communities and Climate Protection Act of 2008, supports the state's climate action goals to reduce GHG emissions through coordinated transportation and land use planning with the goal of more sustainable communities. Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established these targets for 2020 and 2035 for each region covered by one of the state's Metropolitan Planning Organizations (MPOs). CARB periodically reviews and updates the targets, as needed.

Each of California's MPOs must prepare a Sustainable Communities Strategy (SCS) as an integral part of its regional transportation plan (RTP). The SCS contains land use, housing, and transportation strategies that, if implemented, would allow the region to meet its GHG emission reduction targets. Once adopted by the MPO, the RTP/SCS guides the transportation policies and investments for the region. CARB must review the adopted SCS to confirm and accept the MPO's determination that the SCS, if implemented, would meet the regional GHG targets. If the combination of measures in the SCS would not meet the regional targets, the MPO must prepare a separate alternative planning strategy to meet the targets. The alternative planning strategy is not a part of the RTP. Qualified projects consistent with an approved SCS or alternative planning strategy categorized as "transit priority projects" receive incentives to streamline CEQA processing.

Executive Order N-79-20

EO N-79-20, signed by Governor Newsom on September 23, 2020, establishes three goals for the implementation of zero emissions vehicles in California: first, 100 percent of in-state sales of new passenger cars and trucks will be zero-emissions by 2035; second, 100 percent of medium- and heavy-duty vehicles in the state will be zero-emissions vehicles by 2045 for all operations where feasible, and by 2035 for drayage trucks; and third, 100 percent of off-road vehicles and equipment will be zero emissions by 2035 where feasible.

Solid Waste

Assembly Bill 939

In 1989, AB 939, known as the Integrated Waste Management Act (California Public Resources Code (PRC) Sections 40000 et seq.), was passed because of the increase in waste stream and the decrease in landfill capacity. The statute established the California Integrated Waste Management Board to oversee a disposal reporting system. AB 939 mandated a reduction of waste being disposed where jurisdictions were required to meet diversion goals of 25 percent by 1995 and 50 percent by the year 2000 for all solid waste through source reduction, recycling, and composting activities.

Assembly Bill 341

The state legislature enacted AB 341 (California PRC Section 42649.2), amending the Integrated Waste Management Act to include a provision declaring that it is the policy goal of the state that no less than 75 percent of solid waste generated be source-reduced, recycled, or composted by the year 2020, and annually thereafter. In addition, AB 341 required the California Department of Resources Recycling and Recovery (CalRecycle) to develop strategies to achieve the state's policy goal. CalRecycle conducted several general stakeholder workshops and several focused workshops. In August 2015, CalRecycle published a discussion document titled *AB 341 Report to the Legislature*, which identified five priority strategies that CalRecycle believed would assist the state in reaching the 75 percent goal by 2020, legislative and regulatory recommendations, and an evaluation of program effectiveness (CalRecycle 2019).

Assembly Bill 1826

AB 1826 (Chapter 727, Statutes of 2014, effective 2016) requires businesses to recycle their organic waste (i.e., food waste, green waste, landscape, and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste) depending on the amount of waste they generate per week. This law also requires local jurisdictions across the state to implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. The minimum threshold of organic waste generation by businesses decreases over time, which means an increasingly greater proportion of the commercial sector will be required to comply.

Senate Bill 1383

SB 1383 (Chapter 395, Statutes of 2016) established targets to achieve a 50 percent reduction in the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction from the 2014 level by 2025. CalRecycle was granted the regulatory authority required to achieve the organic

waste disposal reduction targets and established an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025 (CalRecycle 2019).

Water

Executive Order B-29-15

In response to an ongoing drought in California, EO B-29-15 (April 2015) set a goal of achieving a statewide reduction in potable urban water usage of 25 percent relative to water use in 2013. The term of the EO extended through February 28, 2016, although many of the directives have become permanent water-efficiency standards and requirements. The EO includes specific directives that set strict limits on water usage in the state. In response to EO B-29-15, the California Department of Water Resources modified and adopted a revised version of the Model Water Efficient Landscape Ordinance that, among other changes, significantly increased the requirements for landscape water use efficiency and broadened its applicability to include new development projects with smaller landscape areas.

Executive Order B-37-16

Issued in May 2016, EO B-37-16 directed the State Water Resources Control Board (SWRCB) to adjust emergency water conservation regulations through the end of January 2017 to reflect differing water supply conditions across the state. The SWRCB also developed a proposal to achieve a mandatory reduction of potable urban water usage that built off the mandatory 25 percent reduction called for in EO B-29-15. The SWRCB and Department of Water Resources were required to develop new, permanent water use targets that built upon the existing state law requirements to achieve 20 percent reduction in urban water usage by 2020. EO B-37-16 also specifies that the SWRCB permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.

Executive Order N-10-21

In response to a state of emergency due to severe drought conditions, EO N-10-21 (July 2021) called on all Californians to voluntarily reduce their water use by 15 percent from their 2020 levels. Actions suggested in EO N-10-21 include reducing landscape irrigation, running dishwashers and washing machines only when full, finding and fixing leaks, installing water-efficient showerheads, taking shorter showers, using a shut-off nozzle on hoses, and taking cars to commercial car washes that use recycled water.

Other State Actions

Senate Bill 97

SB 97 (Dutton) (August 2007) directed the Governor's Office of Planning and Research (OPR; now named the Governor's Office of Land Use & Climate Innovation) to develop guidelines under CEQA for the mitigation of GHG emissions. In 2008, OPR issued a technical advisory as interim guidance regarding the analysis of GHG emissions in CEQA documents. The advisory indicated that the lead agency should identify and estimate a project's GHG emissions, including those associated with vehicular traffic, energy consumption, water usage, and construction activities (OPR 2008). The advisory further recommended

that the lead agency determine the significance of the impacts and impose all mitigation measures necessary to reduce GHG emissions to a level that is less than significant. The CNRA adopted the CEQA Guidelines amendments in December 2009, which became effective in March 2010.

Under the amended CEQA Guidelines, a lead agency has the discretion to determine whether to use a quantitative or qualitative analysis or apply performance standards to determine the significance of GHG emissions resulting from a particular project (CEQA Guidelines Section 15064.4[a]). The CEQA Guidelines require a lead agency to consider the extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions (CEQA Guidelines Section 15064.4[b]). The CEQA Guidelines also allow a lead agency to consider feasible means of mitigating the significant effects of GHG emissions, including reductions in emissions through the implementation of project features or off-site measures. The adopted amendments do not establish a GHG emission threshold, instead allowing a lead agency to develop, adopt, and apply its own thresholds of significance or those developed by other agencies or experts. The CNRA also acknowledges that a lead agency may consider compliance with regulations or requirements implementing AB 32 in determining the significance of a project's GHG emissions (CNRA 2009).

With respect to GHG emissions, the CEQA Guidelines state in Section 15064.4(a) that lead agencies should "make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions. The CEQA Guidelines note that an agency may identify emissions by either selecting a "model or methodology" to quantify the emissions or by relying on "qualitative analysis or other performance-based standards" (CEQA Guidelines Section 15064.4[a]). Section 15064.4(b) states that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment: (1) the extent a 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 determines 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 (CEQA Guidelines Section 15064.4[b]).

3.7.2.3 Regional

San Diego Association of Government's Regional Plan

The San Diego Association of Government's (SANDAG's) 2025 Regional Plan (Regional Plan; SANDAG 2025) combines the RTP, SCS, and Regional Comprehensive Plan. As such, the Regional Plan must comply with specific state and federal mandates. These include an SCS, per SB 375, that achieves GHG emissions reduction targets set by CARB; compliance with federal civil rights requirements (Title VI); environmental justice considerations; air quality conformity; and public participation. The City College campus is within the areas identified in the SCS land use pattern as accommodating nearly 80 percent of future residential development and employment growth in the region, which are forecasted to occur in areas with a high concentration of transportation options.

3.7.2.4 District

California Community Colleges Board of Governors Climate Action and Sustainability Framework

The California Community Colleges Board of Governors' Climate Action and Sustainability Framework (California Community Colleges 2025) is a comprehensive systemwide plan that builds on the 2019 Climate Change and Sustainability Policy to guide all 116 colleges in the California Community Colleges system toward measurable environmental, social, and educational progress. It calls on community college districts throughout the state to set benchmarks and track their advancement toward 2025, 2030, and 2035 goals. The framework focuses on reducing GHG emissions, integrating sustainability into campus operations, and expanding climate-focused curriculum and workforce development.

San Diego Community College District Climate Action Plan

The District's 2023 Climate Action Plan (CAP; District 2023) establishes a 2022 District GHG inventory, which determined that the District's carbon footprint was 62,325 MT CO_2e per year. The main source of these emissions was commuter mobile sources (commuter trips to campus by staff, faculty, and students), which accounted for 73.35 percent of the District's GHG emissions. This was followed by lesser emissions associated with natural gas used in fuel cells, natural gas used for space and water heating, and purchased electricity. The District CAP additionally includes various recommendations for next steps but does not make commitments regarding GHG emission reductions or specific implementation actions. In accordance with CEQA Guidelines Section 15183.5, the District CAP is not a CEQA-qualified CAP and therefore cannot be used for streamlining GHG analyses for future District development projects.

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the District Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and Sustainability Levels. Related to GHG emissions, this includes Materials Impact Goal 2, which outlines the District goal of providing a healthy environment that does not abuse material resources and improves health, with a key performance indicator of maintaining optimal CO_2 levels through the use of materials that are low-carbon, recycled, or responsibly sourced. The Sustainability Levels framework included in this section is further described below.

Sustainability Levels

The District's Sustainability Levels are designed to recognize, measure, and promote sustainable practices across District campuses and facilities. They provide a tiered rating system that encourages environmentally responsible design, construction, and operations. All District capital projects, including new construction, major renovations, and modernization, are required to incorporate the principles outlined in the District Sustainability Levels and meet applicable local, state, and District-adopted sustainability policies. District-adopted sustainability standards include the following:

1. Each campus shall facilitate and maintain an ongoing waste recycling program that establishes where facilities on campus will handle recycled materials including paper, cardboard, glass, plastics, and metal.

2. Renewable woods shall be specified and detailed.

3. The designer shall specify the Carpet and Rug Institute's Green Label Plus Program. All carpet cushion installed in the building shall have low emitting materials and backing.

4. The District's Facilities Services have adopted a program of Green cleaning materials and techniques.

The District's Sustainability Levels include categories with specific requirements that each have an assigned point value. The categories include project design, climate resilience, energy and carbon performance, water conservation and management, materials and waste, indoor environmental quality and wellness, community engagement and learning, and innovation. A scorecard is filled out based on the requirements the project achieves, which determines the sustainability level for the project from the following:

- Baseline/ Sagebrush (Baseline Sustainability) – Meets the District's minimum sustainability standards, with basic energy and water conservation measures.

- Certified/ Coast Live Oak (Sustainable Performance) – Demonstrates significant sustainable strategies.

- Silver/ Torrey Pine (High-Performance Green Building) – Meets advanced sustainable quality benchmarks.

- Gold/ Redwood (Leadership in Sustainability) – Implements innovative sustainability strategies.

- Platinum/ Sequoia (Exemplar of Sustainability) – Sets model for sustainable education facilities.

All final programming documents must contain a section related to sustainability. The conceptual design for new building projects must have sustainable features that achieve the Certified/Coastal Live Oak level at a minimum. Conceptual design schemes for major renovation projects should have sustainable features and may be required to achieve a Certified/Coastal Live Oak level; however, this is determined on a case-by-case basis based on the feasibility of incorporating such features into a renovation project.

District Board Policies and Administrative Procedures

Board Policy 6970: Green Building Policy and Major Renovation Standards. The Board of Trustees has established a Green Building Policy and Major Renovation Standards to provide District students, faculty and staff with working and learning environments that are healthy, thermally, visually and acoustically comfortable; energy efficient; material efficient; water efficient; easy to maintain and operate; safe and secure and sited in an environmentally responsible manner. In accordance with this Board Policy, the District will select architects, engineers, and other professionals who have demonstrated expertise in sustainable design and are Leadership in Energy and Environmental Design (LEED) accredited as deemed appropriate as well as encourage District personnel to become familiar with these standards.

Administrative Procedure 6970: Green Buildings. The purpose of this procedure is to provide guidance for implementing District policies and standards for the design and construction of green buildings and renovations. Efficient energy use and efficiently designed buildings are central to resource sustainability efforts of the District, City, and state. Energy conservation in building design 1) reduces the operating costs of the District, 2) reduces the carbon footprint of the District, and 3) provides environmental education. This Administrative Procedure goes on to outline criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least 5 percent of a project's total energy is generated on site from renewable sources.

3.7.2.5 Local (Non-Regulatory)

The District is not subject to local zoning or land use planning documents, including the City of San Diego's (City's) 2022 CAP and associated implementing regulations. However, as the City College campus is within the City, a summary of the City's CAP strategy is provided below for informational purposes.

City of San Diego Climate Action Plan

On August 2, 2022, the San Diego City Council adopted the 2022 CAP update to establish a community-wide goal and roadmap to net-zero emissions by 2035. The 2022 CAP includes the following six strategies: decarbonization of the built environment, access to clean and renewable energy, mobility and land use, circular economy and clean communities, resilient infrastructure and healthy ecosystems, and emerging climate actions (City 2022). The City is in the process of preparing a CAP Update to maintain alignment with state targets and goals for reducing emissions, which is anticipated to be complete in 2027.

As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the Land Development Code (San Diego Municipal Code Chapter 14, Article 3, Division 14), which established the CAP Consistency Regulations. The CAP Consistency Regulations replaced the CAP Consistency Checklist previously established by the City's 2015 CAP as the measures that could be implemented on a project-by-project basis to streamline evaluation of GHG emissions under CEQA pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Implementation of these measures would ensure that new development projects are consistent with relevant CAP strategies that work toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impact analysis of GHG emissions.

3.7.3 Thresholds of Significance

Given the relatively small levels of GHG emissions generated by a typical development in relation to the total amount of GHG emissions generated on a national or global basis, individual development projects are not expected to result in significant, direct impacts to climate change. However, given the magnitude of the impact of GHG emissions on the global climate, GHG emissions from new development could result in significant, cumulative impacts with respect to climate change. Therefore, the potential for a significant GHG emissions impact is limited to cumulative impacts.

Thresholds used to evaluate potential GHG emissions impacts are based on CEQA Guidelines Appendix G. A significant GHG emissions impact could occur if implementation of the proposed project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The determination of significance for GHG emissions is governed by CEQA Guidelines 15064.4, titled "Determining the Significance of Impacts from Greenhouse Gas Emissions." CEQA Guidelines Section 15064.4(a) states, "[t]he determination of the significance of greenhouse gas emissions calls for a 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. A lead agency shall have discretion to determine, in the context of a particular project, whether to … [use a quantitative model or qualitative model]." CEQA Guidelines Section 15064.4(b) clarifies that a lead agency should consider the following factors when determining the significance of impacts from GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting.

2. Whether project emissions exceed a threshold of significance that the lead agency determines applies to a project.

3. The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, consistent with CEQA Guidelines Section 15064.4, the GHG emissions analysis for the FMP relies upon a threshold based on the exercise of careful judgment and believed to be appropriate in the context of the project.

Neither the State of California, the San Diego County Air Pollution Control District (SDAPCD), nor the District has adopted a quantitative emission-based threshold to determine significance for GHG emissions associated with campus development under CEQA. In the absence of an adopted numeric threshold, the significance of GHG emissions for the project is evaluated based on consistency with statewide goals for the reduction of GHG emissions as outlined in the 2022 Scoping Plan. As the California Supreme Court held in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal. 4th 204), the evaluation of a project based on its effect on California's efforts to meet long-term climate goals is an appropriate significance criterion under CEQA. A project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal. 4th 220-223).

As discussed further in Section 3.7.2.2, 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. Appendix D to the 2022 Scoping Plan specifically includes

recommendations for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies and approval of new land use development. Project consistency with these locally recommended strategies would demonstrate that proposed development is in alignment with state goals and incorporates the design features necessary to contribute its fair share to the state's goal of carbon neutrality by 2045. Therefore, if the project complies with the local strategy recommendations, it can be found to contribute its "fair share" to achieve the state's long-term climate goals and have a less than significant GHG emissions impact.

3.7.4 Impact Analysis

3.7.4.1 Greenhouse Gas Emissions

Threshold 1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Discussion

Program-Level

Project-Generated Emissions

CEQA Guidelines Section 15064.4 states, "[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 GHG emissions resulting from a project." While project GHG emissions impacts are based on implementation of 2022 Scoping Plan strategies as described in Section 3.7.3 above, the following discussion presents an estimate of the GHG emissions generated by project construction for informational purposes.

GHG emissions associated with the FMP were calculated using CalEEMod, Version 2022.1, as further described in Section 3.2.4.2 for construction, mobile, area, and natural gas sources. For the assessment of GHG emissions, the model inputs also account for electricity use, water use and wastewater generation, solid waste disposal, and refrigerants. Electricity and water demand for future development were based on existing usage rates per square foot in campus buildings. Wastewater, solid waste, and refrigerant source emissions were modeled based on CalEEMod defaults. The modeling inputs are explained further in Section 4.1 of Appendix B to the PEIR.

Construction Emissions

The GHG emissions associated with construction of the FMP are quantified for the near-term projects and presented in the project-level analysis below. These near-term projects would consist of similar construction phases, utilize similar construction equipment, and be similar in scale and construction intensity to future projects; therefore, their quantified GHG emissions are generally reflective of the additional projects which would be implemented under the FMP in the future. During concurrent construction of the three near-term projects, the year with the highest GHG emissions would be 2028, with 581.6 MT CO_2e produced from construction. Construction activity would vary by year throughout implementation of the FMP but can be anticipated to result in similar GHG emissions as anticipated on an annual basis for the near-term projects. This is a relatively conservative scenario for concurrent construction activity that may occur within a single year for construction of the remaining FMP projects.

Operational Emissions

GHG emissions associated with buildout of the FMP were estimated using CalEEMod and compared with GHG emissions from existing campus operations (refer to Table 3.7-3). For informational purposes, the total annual and net new GHG emissions for the FMP buildout year of 2045 are shown in Table 3.7-4, *Operational GHG Emissions*. Appendix C, *FMP Full Buildout CalEEMod Output*, of Appendix B to the PEIR contains the CalEEMod output files.

Table 3.7-4
OPERATIONAL GHG EMISSIONS

Emission Sources	2045 Emissions (MT CO_2e)
Vehicular (Mobile)	6,694.5
Area	26.9
Energy	1,839.0
Water/Wastewater	24.8
Solid Waste	562.8
Refrigerants	0.8
Campus Total[1]	**9,148.8**
Existing Campus GHG Emissions (Table 3.7-3)	*7,029.5*
Net New FMP GHG Emissions	**2,119.3**

Source: HELIX 2026
[1] Totals may not sum due to rounding.
GHG = greenhouse gas; MT = metric tons; CO_2e = carbon dioxide equivalent

Although operational emissions would increase with FMP buildout, the increase reflects intensified educational use and campus programming and is reduced by design through building electrification, improvements in transportation efficiency, and consistency with state decarbonization strategies.

Scoping Plan Consistency Analysis

The Scoping Plan (approved by CARB in 2008 and updated in 2014, 2017, and 2022) provides a framework to reduce California's GHG emissions in accordance with AB 32. The 2022 Scoping Plan identified additional GHG reduction measures necessary to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045 in accordance with goals set in AB 1279. The Scoping Plan requires CARB and other state agencies to adopt regulations and other strategies to reduce GHGs. As many of the strategies identified in the Scoping Plan are not directly applicable to specific projects, the 2022 Scoping Plan included Appendix D providing recommendations and clarification on local GHG-reduction strategies and project-level environmental review. As described in Section 3.7.3, consistency with the 2022 Scoping Plan was determined to be an appropriate methodology for assessment of project GHG emissions impact significance as implementation of these strategies would represent the project's "fair share" contribution to meeting state GHG reduction targets.

Table 1 of Appendix D of the 2022 Scoping Plan provides impactful GHG reduction strategies that can be implemented by local governments that address the three local priority areas: (1) transportation electrification, (2) VMT reduction, and (3) building electrification. These areas and strategies are designated as "priority" because they are the GHG reduction opportunities over which local

governments have the most authority and that have the highest GHG reduction potential. The project's consistency with these strategies is provided in Table 3.7-5, *Scoping Plan Consistency Analysis*.

Table 3.7-5
SCOPING PLAN CONSISTENCY ANALYSIS

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
Transportation Electrification	Convert local government fleets to zero emission vehicles (ZEVs) and provide EV charging at public sites	**Consistent.** EV charging stations are currently available to City College students, staff, visitors, and the general public in Parking Structure P200. The FMP parking improvements would additionally include new EV charging stations on campus, though parking at EV chargers is regulated consistent with campus parking requirements. Further, the District is currently purchasing ZEVs for maintenance and facilities staff as the fleet requires replacement, and development of the FMP would not conflict with policies regarding the conversion of fleets to ZEVs.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)	**Consistent.** The FMP would not inhibit the implementation of City or other jurisdiction's actions to support statewide ZEV deployment. The District is currently in the process of purchasing ZEVs for maintenance and facilities staff as vehicles are replaced. As described above, vehicle charging locations within City College parking areas are also available.
VMT Reduction	Reduce or eliminate minimum parking standards	**Consistent.** The District does not have minimum parking standards for its campuses. Although the FMP would include new parking facilities, these improvements would accommodate anticipated student growth and would not result in increased VMT due to the provision of excessive parking (refer to discussion of parking pricing below).
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements	**Consistent.** Although the District is not subject to municipal regulations or plans such as the City's Complete Streets Policy or General Plan Circulation Element, the FMP would not impede implementation of these policies or future complete street improvements on City roadways. The FMP would also include elements to improve on-campus circulation and safety through the construction of pedestrian walkways, a widened crosswalk, and bicycle storage.

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
VMT Reduction (cont.)	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.	**Consistent.** The FMP would increase the density of the City College campus, which is located within a Transit Priority Area (TPA) with easy access to trolley and bus services. The District would continue to provide transit passes for sale at the discounted student rate established by MTS.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking	**Consistent.** The FMP would encourage clean mobility options by including improvements such as pedestrian walkways over Park Boulevard and B Street, a raised and widened crosswalk across B Street, and bicycle storage across the campus.
	Implement parking pricing or transportation demand management pricing strategies	**Consistent.** Parking within the City College campus requires the purchase of a permit, which would align with pricing strategies to encourage the use of public transit in the area. Carpooling is also encouraged through the discounted carpool parking permit option.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood)	**Consistent.** The FMP would implement higher density infill development projects within the City College campus, which is within a walkable area with high quality transit options.
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert “greenfield” land to urban uses (e.g., green belts, strategic conservation easements)	**Consistent.** The FMP would implement infill development projects within the boundaries of the City College campus, which is fully developed with campus uses and surrounded by urban development. Therefore, no greenfield conversion would occur.
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses	**Consistent.** The new buildings constructed under the FMP would be all-electric in accordance with District sustainability policies outlined in the District Design Guidelines and Standards Manual. Construction on campus would be required to comply with Title 24 standards, and projects are further incentivized to reach energy efficiency above the Title 24 baseline as outlined in the District’s Sustainability Levels framework. In addition, Administrative Procedure 6970 includes the goals of outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least 5 percent of a project’s total energy is generated on site from renewable sources.

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
Building Decarbonization (cont.)	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)	**Consistent.** The District would continue to implement green building standards in campus facilities in accordance with Board Policy 6970 (Green Building Policy and Major Renovation Standards) and Administrative Procedure 6970 (Green Buildings) as outlined in Section 3.2.4.2. Administrative Procedure 6970 requires that the renovation of buildings that require 100 percent replacement of mechanical, electrical, and plumbing systems and replacement of over 50 percent of all non-shell areas (interior walls, doors, floor coverings and ceiling systems) would at a minimum achieve LEED Silver or an equivalent certification.
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances	**Consistent.** The District Design Guidelines and Standards Manual includes policies related to building electrification, including a goal to achieve a 75 percent reduction in natural gas usage by 2035. To reduce natural gas usage, the District builds new facilities with no natural gas connections, except in rare circumstances for specialized equipment, and replaces gas-powered equipment with electric equivalents when replacement is needed.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing)	**Consistent.** The City College campus currently hosts solar panels rated approximately one MW that generate renewable energy. The District has previously used programs intended to increase renewable energy generation, such as power purchase agreements for solar panels on other campuses. While no specific renewable energy facilities are part of the FMP, the District would continue to evaluate the feasibility of incorporating such technology on campus as it is available and economically feasible.

2022 Scoping Plan Priority Areas	2022 Scoping Plan Priority GHG Reduction Strategies	Project Consistency Statement
Building Decarbonization (cont.)	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings)	**Consistent.** The City College campus currently already has the maximum one MW of solar panel capacity from which excess energy can be sold to the grid; therefore, new solar panels are not currently being considered for new buildings. City College additionally has a 650-kilowatt hydrogen fuel cell grid located between Building A and Russ Boulevard. Additional renewable energy production and storage technologies are considered by the District as feasible.

Source: CARB 2022

As shown in Table 3.7-5, the FMP would not impede implementation of the GHG reduction strategies identified in the 2022 Scoping Plan. Rather, many of the District and City College policies would be consistent with these GHG reduction strategies. Therefore, buildout of the FMP would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.

Project-Level

Construction Emissions

GHG emissions would be associated with the construction phases of each of the near-term projects through the use of off-road heavy equipment and vehicle trips from construction worker, vendor, and haul trips. An inventory of construction GHG emissions estimated using CalEEMod for each of the near-term projects is provided below for informational purposes. See Appendix B to the PEIR for additional details regarding model inputs. Table 3.7-6, *Near-Term Construction GHG Emissions by Year*, presents a summary of the total annual GHG emissions associated with the construction of the near-term projects.

Table 3.7-6
NEAR-TERM CONSTRUCTION GHG EMISSIONS BY YEAR

Year	Building A Expansion Emissions (MT CO_2e)	Performing Arts Center Emissions (MT CO_2e)	North Campus Athletic Fields Emissions (MT CO_2e)	Total Annual Emissions (MT CO_2e)
2026	--	--	32.8	**32.8**
2027	33.5	3.4	153.2	**190.1**
2028	410.6	171.0	--	**581.6**
2029	372.5	143.3	--	**515.8**
2030	46.7	--	--	**46.7**
Total Construction Emissions	**863.3**	**317.7**	**186.0**	--

Source: HELIX 2026
MT = metric tons; CO_2e = carbon dioxide equivalent

Operational Emissions

Operation of the near-term projects proposed under the FMP is accounted for in the GHG emissions calculated for the full buildout of the FMP provided for informational purposes in Table 3.7-4 above and the Scoping Plan consistency analysis contained in Table 3.7-5. The incremental change in GHG emissions as each near-term project becomes operational would be minimal as these projects would replace similar uses with new but expanded facilities that incorporate more stringent energy efficiency standards. As the near-term projects would be consistent with the Scoping Plan, operation of the near-term projects would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.

Level of Significance Prior to Mitigation

The FMP, including the near-term projects, would not generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.7.4.2 Greenhouse Gas Emission Reduction Plans

Threshold 2: Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

Impact Discussion

Program-Level

There are numerous state plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Statewide plans and regulations such as GHG emissions standards for vehicles (AB 1493), the LCFS, and regulations requiring an increasing fraction of electricity to be generated from renewable sources are being implemented at the statewide level; as such, compliance at the project level is not addressed. Impacts of the FMP are evaluated based on whether the project would conflict with or obstruct implementation of CARB's 2022 Scoping Plan or the California Community Colleges Sustainability and Climate Action goals.

California Air Resources Board 2022 Scoping Plan

As discussed in Section 3.7.2.2, 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. Appendix D to the 2022 Scoping Plan includes recommendations for local government actions that align with the state's climate goals, with a focus on local GHG reduction strategies for new land use development. As demonstrated in Section 3.7.4.1 above, the project would be consistent with the priority GHG reduction strategies identified in Appendix D of the 2022 Scoping Plan and therefore address the three key priorities identified by the 2022 Scoping Plan for local jurisdictions.

California Community Colleges Board of Governors Climate Action and Sustainability Framework

The California Community College Climate Action and Sustainability Framework provides goals and recommendations for community college districts in response to the Board of Governors Climate

Change and Sustainability Policy. The latest version of this framework aligned the California Community Colleges with the 2017 Scoping Plan; therefore, the analysis provided in Section 3.7.4.1 related to the 2022 Scoping Plan demonstrates that the project would be consistent with the more recent state goals and recommendations. Nonetheless, the following describes how District programs and the FMP align with the Climate Action and Sustainability Framework goals, which are intended to be specifically relevant to community colleges.

Greenhouse Gas Emissions Reduction

The GHG Emissions Reduction goals of the Climate Action and Sustainability Framework recommend that each campus submits to the Chancellor's Office measurable sustainability objectives, including carbon emissions baselines, carbon emissions inventories, and local CAPs, and then continues to track and report campus GHG emissions. To achieve statewide goals, campuses are then recommended to reduce campus/district GHG emissions (purchases of electricity and natural gas; fleet and marine vessel usage; and other emissions over which the entity has direct control) by at least 75 percent by 2030 and 100 percent by 2035. While emissions from commute sources are outside of a district's control, the community colleges are encouraged to promote the use of alternative transportation and/or alternative fuels to reduce transportation emissions. Lastly, new construction and renovation projects are encouraged to emphasize optimum energy utilization, low life cycle operating costs, and compliance with all applicable energy codes (enhanced Title 24 energy codes) and regulations, including for specialized construction types (e.g., historical buildings) that are not regulated through the current energy codes.

As summarized in Section 3.7.2.4, the District completed its carbon emission baseline inventory and the District CAP in 2023 (District 2023). In addition, as discussed further under Green Buildings below, the District has Board Policies and Administrative Procedures which mandate certain green building techniques to reduce GHG emissions for new construction and renovation projects. In addition, the Sustainability Levels provide incentives for exceeding Title 24 regulations as discussed further under Energy below. All new buildings constructed under the FMP would be all-electric and would therefore reduce emissions from natural gas use and be consistent with the goals outlined above.

Green Buildings

The Green Buildings goals of the Climate Action and Sustainability Framework encourage districts to benchmark energy usage intensity for each building and develop a zero net energy and campus electrification strategy or conduct LEED or WELL assessment of existing buildings. By 2030, it is recommended that new buildings and major renovations are constructed as zero net energy ready, new buildings be certified LEED or WELL Gold, and natural gas use in buildings be reduced by 30 percent. Building on these goals, by 2035 it is recommended that new buildings and major renovations are constructed as zero net energy and certified Zero Carbon, existing buildings are certified LEED Operations and Maintenance Gold or WELL Gold equivalent, and natural gas use in buildings be reduced by 75 percent.

The District Energy and Environmental Plan within the Strategic Energy and Environmental Plan included a LEED assessment of existing District buildings. The District currently implements green building standards in campus facilities in accordance with Board Policy 6970 (Green Building Policy and Major Renovation Standards) and Administrative Procedure 6970 (Green Buildings) as outlined in Section 3.7.2.4. Board Policy 6970 requires the District to select architects, engineers and other professionals who have demonstrated expertise in sustainable design and are accredited. Administrative Procedure

6970 provides guidance for implementing District policies and standards for the design and construction of green buildings and renovations and outlines criteria for new buildings including, but not limited to, outperforming Title 24 energy efficiency standards by at least 20 percent, striving to achieve a LEED-NC gold rating, and requiring that at least five percent of a project's total energy is generated on site from renewable sources. The District has additionally developed the Sustainability Levels, which provide a tiered rating system that encourages environmentally responsible design, construction, and operations and applies to new construction, major renovations, and modernization projects. See Section 3.7.2.4 for additional details regarding this program. The projects implemented under the FMP would continue to comply with these policies throughout design, construction, and operation of individual projects.

Energy

The Energy goals of the Climate Action and Sustainability Framework state that California's local community colleges should consider establishing a campus energy use intensity (EUI) score, conduct Effective Useful Life analysis of all gas-using appliances and systems, and plan for electrification of systems with Effective Useful Life of less than 10 years. In addition, the Energy goals encourage colleges to decrease EUI by 25 percent compared to the campus benchmark and annually produce or procure 75 percent of on-site electrical consumption using renewable energy by 2030. Lastly, the Energy goals encourage college campuses to decrease EUI by 40 percent compared to the campus benchmark and accomplish Net Zero Energy Campus by 2035.

The District has identified a goal of maximizing the amount of on-site renewable energy generation with a Key Performance Indicator (KPI) of solar panels installed on every new building. The City College campus currently already has the maximum of one MW of solar panel capacity from which excess energy can be sold to the grid; therefore, new solar panels are not currently being considered for new buildings. The District has additionally identified the goal of decreasing energy consumption through metering on-campus buildings, utilizing cool roofs, and utilizing natural daylight for lighting through the installation of skylights. Existing gas-powered appliances, especially heating and cooling systems, are replaced with electric appliances as they require replacement. The Sustainability Levels framework additionally identifies incentives for energy and carbon performance standards, including energy efficiency greater than Title 24 requirements, integration of on-site renewable energy sources and battery storage, and all-electric construction. Further, as stated in the District Design Guidelines and Standards Manual, it is the policy of the District for all projects to be as energy efficient and as space efficient as possible. Future campus projects would continue to incorporate energy efficiency features into their design and minimize the use of natural gas in support of these goals.

Water

The Water goals of the Climate Action and Sustainability Framework encourage community colleges to manage water more sustainably by using local benchmarks for potable water consumption, identifying non-potable water sources, and adopting best-practice programs such as the California Community College Model Stormwater Management Program. They are additionally encouraged to reduce potable water use by 25 percent through measures such as separately metering large irrigation systems, prioritizing native plants, limiting turf grass, and aligning with Municipal Separate Storm Sewer System (MS4) requirements by 2030. By 2035, colleges should aim for a 50 percent reduction in potable water use from baseline levels and ensure stormwater runoff and discharge match predevelopment conditions by incorporating green infrastructure and low-impact development across campuses and in new construction.

The District has identified a goal of decreasing water usage on its campuses with supporting actions including separating landscape from domestic water reporting, implementing rainwater capture, using water efficient plumbing fixtures, and planting native and water efficient planting. In addition, the Sustainability Levels establish incentives for District projects to incorporate water conversation measures, including low-flow plumbing fixtures, reduction in potable water use, and utilizing native and/or drought tolerant species for landscaping. The District Design Guidelines and Standards Manual further includes the Storm Water Management Requirements section, which states that the District has elected to comply with MS4 requirements. Low impact development (LID) strategies would also be incorporated into site designs to promote stormwater infiltration. Projects implemented under the FMP would incorporate these actions as feasible into their design and would therefore support these goals.

Waste

The Waste goals of the Climate Action and Sustainability Framework encourage districts and community colleges to strengthen their waste-reduction efforts by conducting waste categorization assessments, benchmarking material use, complying with relevant Title 14 regulations, assessing AB 341 compliance, and centralizing waste-reporting systems by 2025. By 2030, they should work toward zero waste to landfills, complete a circularity analysis, and reduce total material consumption by 10 percent. By 2035, they are encouraged to increase material circularity by 25 percent and reduce overall material consumption by 25 percent.

The District Design Guidelines and Standards Manual includes a list of sustainability standards adopted by the District, which states that each campus shall facilitate and maintain an ongoing waste recycling program that establishes where facilities on campus will handle recycled materials including paper, cardboard, glass, plastics, and metal. The City College campus would continue to maintain this program, and implementation of the FMP, including the near-term projects, would not impede implementation of this program. In addition, the District Design Guidelines and Standards Manual identifies the goal of achieving a minimum “end-of-project” recycling rate of 75 percent for non-hazardous solid waste and a further goal of 90 percent diversion from landfills and incinerators by weight, including both demolition and construction waste. Projects are required to implement construction waste management plans to reduce the amount of construction waste that is disposed of in landfills. The projects implemented under the FMP would implement these waste reduction goals as feasible to be consistent with the Waste goals of the Climate Action and Sustainability Framework.

Purchasing and Procurement

The Purchasing and Procurement goals of the Climate Action and Sustainability Framework encourage Districts and community colleges to strengthen sustainable purchasing practices by benchmarking the environmental performance of current products and services, adopting sustainable procurement policies, and prioritizing environmentally preferable electronics by 2025. By 2030, they should work to increase their procurement of sustainable goods and services by 25 percent above baseline levels, and by 2035, they are encouraged to expand that progress to a 50 percent increase. In order for the state’s community colleges to reach these goals, campuses can promote use of suppliers and/or vendors who reduce waste, re-purpose recycled material, or support other environmentally friendly practices in the provision of goods or services. In order to move to zero waste, campus practices can: (1) encourage use of products that minimize the volume of trash sent to landfills or incinerators; (2) participate in the CalRecycle Buy-Recycled program or equivalent; and (3) increase recycled content purchases in all Buy-Recycled program product categories.

The Sustainability Levels establish incentives for on-campus projects to incorporate sustainability practices into each phase of project implementation. Specifically, the Sustainability Levels identify incentives for implementing sustainable procurement policies and using at least 30 percent recycled building materials. Individual projects under the FMP would incorporate these sustainability measures as feasible in order to achieve a score that meets the baseline sustainability requirements outlined in the Sustainability Levels section of the District Design Guidelines and Standards Manual. As such, the FMP would implement the Purchasing and Procurement goals during the construction and operation phases of each project consistent with these goals.

Transportation

The Transportation goals of the Climate Action and Sustainability Framework encourage districts and community colleges to improve sustainable transportation by assessing the condition and electrification potential of their fleet vehicles, expanding EV-charging infrastructure, promoting shared and accessible transportation options, and enhancing pedestrian and bicycle access by 2025. By 2030, they should aim for half of all new fleet vehicles and rolling stock to be zero-emission and may consider green parking permits. By 2035, they are encouraged to transition fully so that 100 percent of new fleet vehicles and rolling stock are zero-emission, supporting a long-term shift toward cleaner campus mobility.

The City College campus is within a Transit Priority Area (TPA) as defined under SB 743 and is surrounded by a variety of high-quality public transit options accessible via existing pedestrian infrastructure. The use of shared or public transportation is encouraged through the requirement to pay for on-campus parking, with a discounted option for carpool permits. The long-term projects under the FMP that include parking would expand EV-charging infrastructure through the installation of EV-charging stations at new parking facilities at the City College campus. In addition, projects planned under the FMP would include secure bicycle storage, widened crosswalks, and pedestrian walkways. The District also anticipates continuing to electrify its vehicle fleet as existing vehicles require replacement.

Food Systems

The Food Systems goals of the Climate Action and Sustainability Framework encourage Districts and colleges to improve the sustainability of their food systems by having food service providers track and report sustainable food purchases using the Real Food Challenge guidelines or an equivalent framework. By 2030, they should work toward ensuring that 20 percent of their total food budget goes to sustainable options, and by 2035, aim for 80 percent of all food served on campus to meet Real Food Challenge standards or similar criteria, strengthening long-term commitments to ethical, healthy, and environmentally responsible dining.

Implementation of the FMP would not prevent implementation of the practices and policies related to food systems that the District is implementing or preparing to implement at its campuses, including City College. In addition, projects implemented under the FMP that include dining facilities, such as the Building A Expansion project, would be required to implement the specific sustainable food procurement policies outlined in the Food Systems goals above as they are implemented by the District.

Project-Level

Consistency with applicable plans, policies, and regulations related to GHG emissions that are implemented at the District level is discussed above. Of these, the ones that would apply at the individual project level would include Board Policy 6970 (Green Building Policy and Major Renovation

Standards), Administrative Procedure 6970 (Green Buildings), implementation of the goals in the Sustainability Levels as feasible, and installation of EV charging stations at new parking facilities. In accordance with Administrative Procedure 6970, the near-term projects would be designed and built to a minimum standard equivalent to a LEED-NC Silver rating and would strive to achieve a standard equivalent to a LEED-NC gold rating. Water efficient features would also be incorporated into the project designs. With adherence to these District policies, implementation of the near-term projects would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Level of Significance Prior to Mitigation

The FMP, including the near-term projects, would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.7.5 Cumulative Impact Analysis

The geographic scope of consideration for GHG emissions is global, as such emissions contribute, on a cumulative basis, to global climate change. By nature, GHG impacts are cumulative as they are the result of combined worldwide emissions over many years, and additional development would incrementally contribute to this cumulative impact. As such, the impact analysis presented above also serves as the project's cumulative impact analysis related to GHG emissions. This approach is consistent with the supporting documentation published by the CNRA when promulgating the SB 97-related CEQA amendments, which indicated that the impact of GHG emissions should be considered in the context of a cumulative impact, rather than a project-level impact. Therefore, as identified in Section 3.7.4, above, the project would not generate GHG emissions that could have a significant impact on the environment and would not conflict with plans adopted for the purpose of reducing GHG emissions. The contribution of the FMP, including the near-term projects, to a globally significant cumulative impact related to GHG emissions **would not be cumulatively considerable**.

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3.8 Hazards and Hazardous Materials

This section addresses the potential hazards and hazardous materials impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to hazards and hazardous materials are also addressed.

3.8.1 Environmental Setting

A "hazardous material" is defined by California Health and Safety Code Section 25501(n) as a material "that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and other materials which a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

3.8.1.1 Hazardous Materials Sites

To determine if hazardous materials sites exist on or adjacent to the City College campus, a records search was conducted by HELIX in February 2026 of federal, state, and local databases of sites that generate, store, treat, or dispose of hazardous materials, or sites for which a hazardous materials release or incident has occurred. Specifically, this included review of the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2026) and the State Water Resources Control Board (SWRCB) GeoTracker database (SWRCB 2026). The EnviroStor database is a geographic information system that lists Federal Superfund Sites; State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School Cleanup sites. The GeoTracker database is a data management system for tracking potential impacts to groundwater and activities that involve groundwater cleanup, such as remediation for leaking underground storage tanks. The results of the database searches are summarized below.

The GeoTracker database listed approximately 21 Leaking Underground Storage Tank Cleanup Sites and 26 Cleanup Program sites within 1,000 feet of the City College campus. Of these, there was a single Cleanup Program site that remains open: Future Park at 8th and B (T10000024464). This Cleanup Program site occurs approximately 1,000 feet west of campus at 8th Avenue and B Street and the case remained open as of February 3, 2026 (SWRCB 2026). The potential contaminant of concern is lead within soil.

The EnviroStor database lists a single open site within 1,000 feet of the City College campus: Former Goodyear Auto Care (600001296). This evaluation site approximately 630 feet southwest of the project site at 1045 Broadway was referred to San Diego County (County) as of February 1, 2010 (DTSC 2026). The building in this location was burned down, which resulted in the presence of petroleum hydrocarbons and chlorinated solvents in soils. A Senate Bill (SB) 1248 Notification received by the County requested oversight and concurrence with removal action proposed by the property owner.

The two open sites identified present a localized hazard within their respective site soils. Considering the distance and development between them and the City College campus, it does not appear that soil at the project site would be contaminated as a result of the identified open sites.

3.8.1.2 Emergency Response and Evacuation

The County's Office of Emergency Services provides Evacuation Planning Map Books which identify emergency relocation and evacuation routes through the County, classified as Genesys Evacuation Zones. Evacuation routes near the City College campus include Interstate (I-) 5, State Route (SR) 163, 11th Avenue, Ash Street, Broadway, and Park Boulevard within Balboa Park (County 2024). The specific evacuation routes used during an emergency are determined by emergency responders who decide the routes that should be used for evacuation at the time of the emergency after assessing the conditions and location of the emergency.

3.8.1.3 Airport Hazards

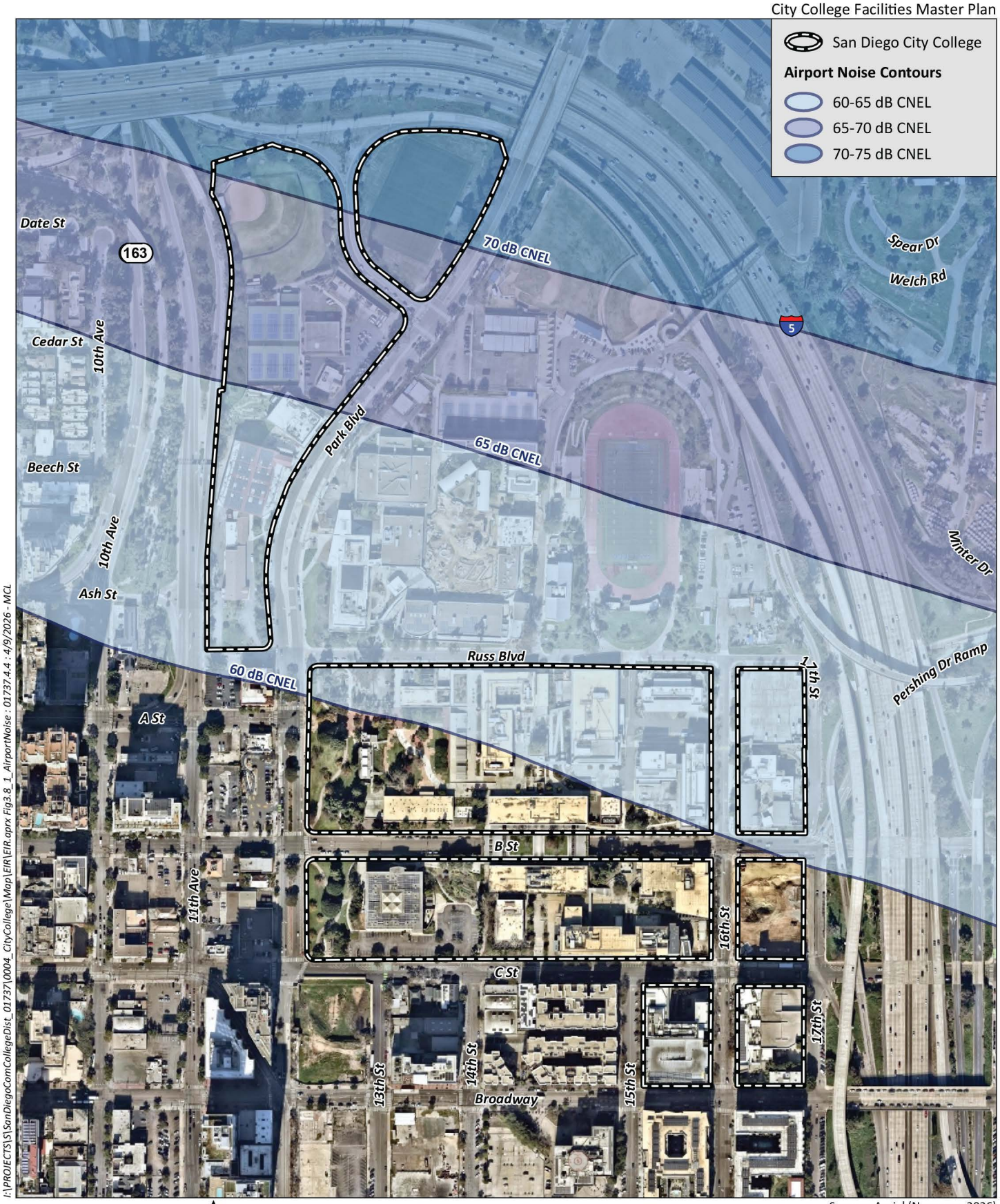
The nearest airport to the project site is the San Diego International Airport, located approximately 1.2 miles northwest of the City College campus. The project site is within the Airport Influence Area (AIA) of the San Diego International Airport, which includes areas within the airport's noise contours and safety zones (San Diego County Regional Airport Authority [SDCRAA] 2025). Portions of the project site are within the 60-65, 65-70, and 70-75 decibel (dB) community noise equivalent level (CNEL) noise contours for the airport. Generally, the highest airport noise levels occur on North Campus where athletic facilities occur. See Figure 3.8-1, *Airport Noise Contours*.

Safety Zones 1 through 5 are established for the San Diego International Airport based on the designated flight path and relative risk of aircraft accidents. Safety Zone 1 occurs along the airport runway and other land uses are not allowed in this area, while less risk is associated with Safety Zone 5 and residential and nonresidential land uses are allowed with restrictions on density. The northern edge of the Betty Hock softball field and soccer field occur within Safety Zone 4E (SDCRAA 2025). The remainder of the project site occurs outside of designated Safety Zones. Refer to Figure 3.8-2, *Airport Safety Zones*.

3.8.1.4 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped Fire Hazard Severity Zones for San Diego County, and identifies responsibility areas for fire protection, including federal, state, and local responsibility areas. CAL FIRE maintains mapping datasets that estimate fire threat potential throughout California based on presence of flammable vegetation (e.g., fuel), topography, fire history, and climate. Based on these data, areas are mapped as Fire Hazard Severity Zones and assigned one of three levels of fire hazard: moderate, high, and very high.

The City of San Diego (City) has adopted Very High Fire Hazard Severity Zone (VHFHSZ) maps that add to the hazard areas recommended by CAL FIRE for its local responsibility area (City 2025). Only the northwesternmost portion of the campus was recommended by CAL FIRE as a VHFHSZ, and the majority of the North Campus was recommended as a High or Moderate Fire Hazard Severity Zone (CAL FIRE 2025). The City, however, identifies all fire hazard zones as VHFHSZs and does not include moderate or high severity designations. The City maps North Campus as a VHFHSZ, while South Campus is located outside of the VHFHSZ. The VHFHSZ in which North Campus occurs appears to be primarily associated with the vegetation surrounding SR 163 within Balboa Park, north of I-5, as North Campus occurs on the edge of the area mapped as a VHFHSZ, as shown in Figure 3.18-1, *Wildfire Hazard Zones*. See Section 3.18, *Wildfire,* for further detail.



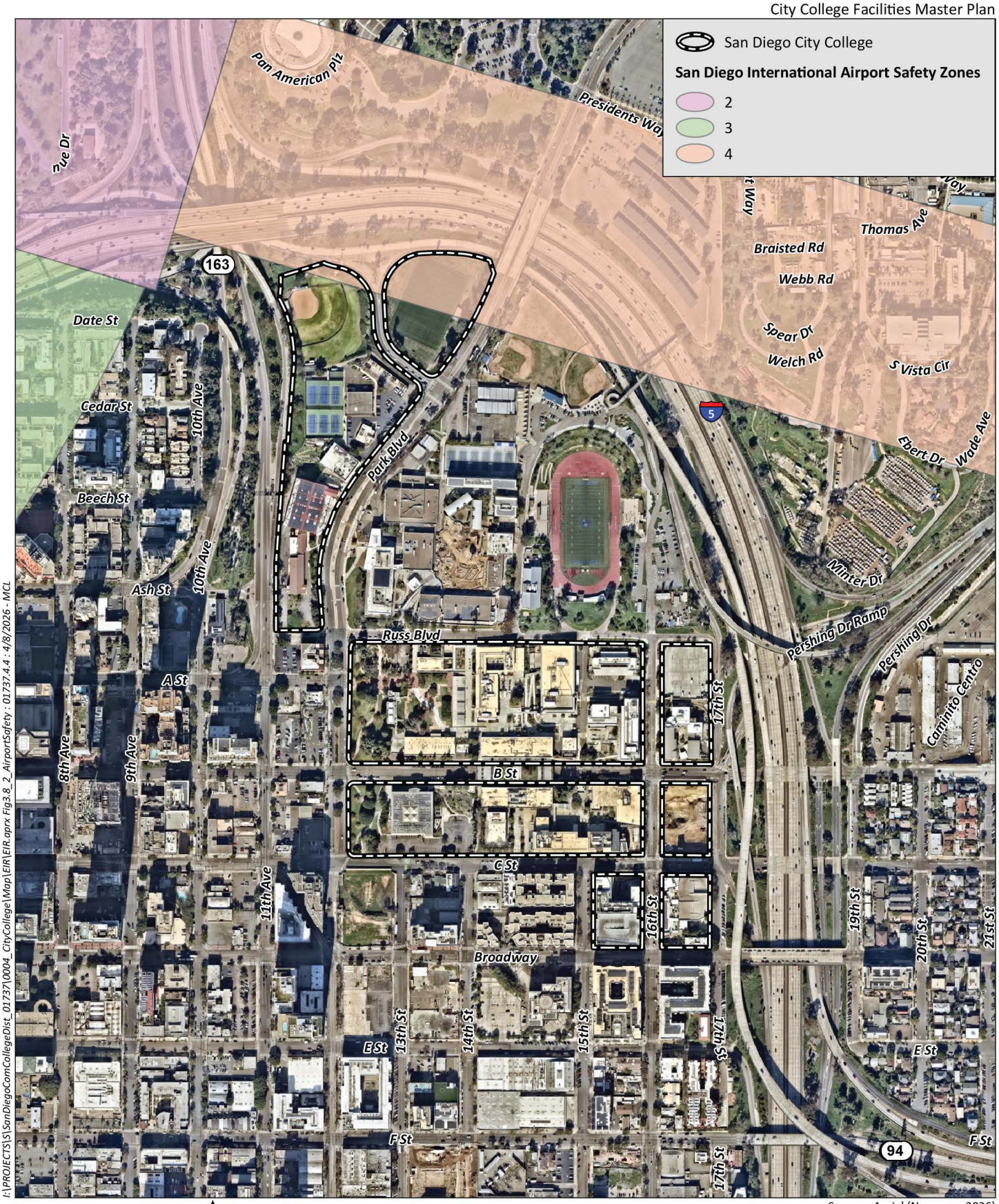
0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Airport Noise Contours

Figure 3.8-1



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\0004_CityCollege\Map\EIR\EIR.aprx Fig3.8_2_AirportSafety : 01737.4.4 : 4/8/2026 - MCL

0 550 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Airport Safety Zones

Figure 3.8-2

3.8.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to hazards and hazardous materials is provided below.

3.8.2.1 Federal

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (USEPA) works closely with other federal agencies as well as state and local governments to develop and enforce regulations under existing environmental laws. The USEPA is primarily responsible for researching and setting national standards for a variety of environmental programs, and delegates to states and tribes responsibility for issuing permits and monitoring and enforcing compliance. When national standards are not met, the USEPA can issue sanctions and take other steps to assist the states and tribes in reaching the desired levels of environmental quality. USEPA Region 9 has jurisdiction over the southwestern United States, including San Diego County.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act (RCRA) is the predominant federal law governing the ongoing generation and management of hazardous waste. Regulations under RCRA are codified in Title 40 of the Code of Federal Regulations (CFR), Parts 239 through 282, and provide a framework for "cradle to grave" handling of hazardous waste. Specifically, this requires entities to track their hazardous waste from the point of generation to the point of recycling, reuse, or permanent disposal. The Federal Hazardous and Solid Waste Amendments of 1984 called for waste minimization and phasing out disposal of hazardous wastes to landfills, developed standards for underground storage tanks, and prescribed the process for corrective action following releases. The USEPA has the primary role of implementing RCRA, although individual states (including California, as outlined below) are also authorized to carry out provisions of the law.

Spill Prevention, Control, and Countermeasure Rule

The federal Spill Prevention, Control, and Countermeasure Rule (40 CFR 112) was enacted to provide engineering, operational, maintenance, and management strategies that minimize the potential for a spill or release of oil products, such as fuel and petroleum/lubricating oil, from certain storage and operational equipment and activities and prevent an oil spill from entering a waterway. The federal requirements of this rule apply to owners or operators of non-transportation-related, onshore and offshore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing, or consuming oil or oil products. Facilities subject to the rule must prepare and implement a Spill Prevention, Control, and Countermeasure Plan.

Hazardous Materials Transportation Act of 1975

The U.S. Department of Transportation (USDOT) has the authority to regulate the transportation of hazardous materials under Title 49 of the CFR. Last amended in 2005, the Hazardous Materials Transportation Act provides minimum regulations for the transport of hazardous materials by air, land, rail, or water. The four key provisions of the law are the establishment of procedures and policies, rules for material designations and labeling, packaging requirements, and operational rules. The California

Highway Patrol and the California Department of Transportation (Caltrans) are the state agencies with primary responsibility for governing hazardous materials transportation permits in California, enforcing federal and state regulations, and responding to hazardous materials transportation emergencies.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, provides national guidelines for responding to releases or threatened releases of hazardous substances and maintains a trust fund to clean up known hazardous waste sites. Federal actions related to CERCLA are limited to sites on the National Priorities List for cleanup activities, with National Priorities List listings based on the USEPA Hazard Ranking System. The Hazard Ranking System is a numerical ranking system used to screen potential sites based on criteria such as the likelihood and nature of hazardous material release, and the potential to affect people or environmental resources. CERCLA was passed in 1980 and was amended in 1986 by the Superfund Amendments and Reauthorization Act.

Superfund Amendments and Reauthorization Act

The Superfund Amendments and Reauthorization Act made the following changes and additions to the Superfund program under CERCLA:

- The budget allotted to the trust fund for cleanup actions was increased.
- The Hazard Ranking System was revised to more accurately reflect risks that hazardous waste sites pose to human health and the environment.
- State involvement was increased, and changes were made to ensure consistency with other state and federal laws and regulations.
- There was a greater focus on permanent remedies and innovative treatment technologies.
- Citizen participation in the decision-making process was encouraged.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act was authorized by Title III of the Superfund Amendments and Reauthorization Act. The purpose of this act is to support emergency response preparedness and to provide the public with information regarding potential chemical hazards in their communities. The law directs emergency planning committees at the local and state level to develop emergency response plans for chemical releases. It also requires industry entities to provide information to local, state, and federal governments on the storage, use, and release of hazardous chemicals.

Lead and Asbestos Regulations

The U.S. Consumer Product Safety Commission banned the manufacture and sale of lead-containing paint for consumer use in 1978 pursuant to Title 16 of the CFR, Part 1303. This effectively prohibited the use of lead-based paint (LBP) in residential structures and other public-facing buildings. As a result, residential buildings constructed prior to 1978 may contain LBP, while those constructed thereafter are generally not expected to include lead-based coatings.

In 1989, the USEPA issued the Asbestos Ban and Phase-Out Rule under the Toxic Substances Control Act, which was meant to prohibit the manufacture, importation, processing, and distribution of most asbestos-containing products. Although this rule was largely remanded by the U.S. Court of Appeals in 1991, it established prohibitions on new uses of asbestos and permanently banned several specific asbestos-containing materials (ACMs). More recently, under the amended Toxic Substances Control Act authority, USEPA finalized a rule in March 2024 regulating and prohibiting ongoing uses of chrysotile asbestos, the only form of asbestos historically still imported into the United States. This rule, codified at 40 CFR Part 751, continues the federal phase-out of ACMs due to their known carcinogenic health effects.

3.8.2.2 State

California Code of Regulations Title 22

Most state and federal regulations and requirements for hazardous waste are codified in Title 22 of the California Code of Regulations (CCR), Division 4.5. Title 22 contains detailed compliance requirements for hazardous waste generation, transport, treatment, storage, and disposal facilities. California is a state fully authorized to implement RCRA; therefore, most RCRA regulations are integrated into Title 22. The DTSC regulates hazardous waste more stringently than the USEPA, however, so Title 22 does not contain as many exemptions or exclusions as the equivalent federal regulations. Similar to the California Health and Safety Code (as outlined below), Title 22 also regulates a wider range of waste types and waste management activities than RCRA. While California has enacted a number of additional regulations from various CCR titles related to hazardous materials, such as waste and toxics in CCR Titles 26 (Toxics), 23 (Waters) and 27 (Environmental Protection), state hazardous waste regulations are still commonly referred to collectively as Title 22.

California Health and Safety Code, Hazardous Materials Release Response Plans and Inventory

The DTSC has established rules governing the use of hazardous materials and the management of hazardous wastes. California Health and Safety Code Section 25531, et seq., incorporates the requirements of the Superfund Amendments and Reauthorization Act and the Clean Air Act as they pertain to hazardous materials. Under the California Accidental Release Prevention Program, certain businesses that store or handle more than 500 pounds, 55 gallons, or 200 cubic feet (for gases) of acutely hazardous materials at their facilities are required to develop and submit a Risk Management Plan to the appropriate local authorities, the designated local administering agency, and the USEPA for review and approval. The Risk Management Plan is intended to satisfy federal “right-to-know” requirements and provide basic information to regulators and first responders, including identification/quantification of regulated substances used or stored on site, operational and safety mechanisms in place (including employee training), potential on- and off-site consequences of a release, and emergency response provisions.

Under California Health and Safety Code, Division 20, Chapter 6.95, businesses handling or storing certain amounts of hazardous materials are required to prepare a Hazardous Materials Business Plan (HMBP). Recent updates to the California Health and Safety Code, such as those enacted under Assembly Bill (AB) 1716 (effective January 1, 2024), have strengthened the HMBP requirements by mandating more detailed emergency response plans and documented employee training. HMBPs must include a comprehensive inventory of hazardous materials stored on site (above specified quantities), a

site-specific emergency response plan, an employee training program, and a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. HMBPs must be prepared prior to facility operation and updated if there are significant changes in business location, ownership, or operations.

Pursuant to California Health and Safety Code Chapter 6.11, the California Environmental Protection Agency (CalEPA) established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which consolidated six existing state programs related to hazards and hazardous materials. The six programs consolidated under the Unified Program are the Aboveground Petroleum Storage Act Program, California Accidental Release Prevention Program, HMBP requirements, Hazardous Materials Management and Inventory Program, Hazardous Waste and Hazardous Waste Treatment Program, and Underground Storage Tank Program. The Unified Program also allows the designation of Certified Unified Program Agencies to implement associated state regulations within their jurisdictions.

Cortese List

The provisions of Government Code Section 65962.5 are commonly referred to as the Cortese List. The Cortese List is a planning document used by state and local agencies to provide information about hazardous materials release sites. Government Code Section 65962.5 requires CalEPA to develop an updated Cortese List annually, at minimum. DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Hazardous Waste Control Act

The Hazardous Waste Control Act is implemented by regulations contained in CCR Title 26 that describe requirements for the proper management of hazardous wastes. The act created the state hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Hazardous Waste Control Act and Title 26 regulations list more than 800 potentially hazardous materials and establish criteria for identifying, packaging, transporting, and disposing of such wastes. Under these regulations, the generator of hazardous waste material must complete a manifest that accompanies the material from the point of generation to transportation to the ultimate disposal location, with copies of the manifest filed with the DTSC.

California Building Standards Code

Refer to Section 3.18.2.1 for an overview of fire-specific building regulations included in the California Building Standards Code, including the California Building Code (CBC), California Wildland Urban Interface Code (CWUIC), and California Fire Code (CFC). These regulations specifically address construction within VHFHSZs and require fire-hardened construction to prevent ignitions, allow evacuation, and slow the spread of wildfire.

3.8.2.3 Regional

San Diego County Department of Environmental Health and Quality/Hazardous Materials Division

The County Department of Environment Health and Quality is the designated Certified Unified Program Agency for San Diego County and is responsible for regulating all uses within the County that handle, store, generate, or treat hazardous wastes and materials. The Hazardous Materials Division provides oversight, permitting, and compliance monitoring for several programs, including those related to HMBPs, the Hazardous Waste Generator Program, Underground Storage Tanks, the Aboveground Petroleum Storage Act, the California Accidental Release Prevention Program, and hazardous materials release response plans and inventories. Projects that would encounter or use hazardous materials are required by law to develop applicable HMBPs, obtain and maintain a valid Unified Program Facility Permit, and submit their facility information electronically to the California Environmental Reporting System.

San Diego County Emergency Operations Plan

The San Diego County Emergency Operations Plan is a comprehensive emergency management system that provides for a planned response to natural disaster situations, technological incidents, and nuclear defense operations (County 2022). The Emergency Operations Plan includes operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and assuring the overall well-being of the County's population. The Emergency Operations Plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector. Refer to Section 3.18.2.2 for additional discussion of this plan relative to potential wildfire hazards.

San Diego County Multi-Jurisdictional Hazard Mitigation Plan

The San Diego County Multi-Jurisdictional Hazard Mitigation Plan was prepared to meet federal and state requirements for disaster preparedness that make the County eligible for funding and technical assistance from state and federal hazard mitigation programs. The plan includes a risk assessment to enable local jurisdictions to identify and prioritize appropriate mitigation actions that will reduce losses from potential hazards, including flooding, earthquakes, fires, and humanmade hazards. To address potential hazards, the plan then incorporates mitigation goals and objectives, mitigation actions and priorities, an implementation plan, and documentation of the mitigation planning process for each of the twenty-one participating jurisdictions, including the City (County 2023). Refer to Section 3.18.2.2 for additional discussion of this plan relative to potential wildfire hazards.

Airport Land Use Compatibility Plans

The SDCRAA serves as the Airport Land Use Commission (ALUC) for San Diego County and is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for 16 public use and military airports in the County. The ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them in the areas of noise, overflight, safety, and airspace protection. The project site occurs within the AIA for

the San Diego International Airport and is subject to noise and safety-related policies contained therein. Refer to Section 3.10.2.2 for further detail regarding ALUCP policies.

3.8.2.4 District

District Design Guidelines and Standards Manual

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to hazardous materials are anticipated to apply to future projects

Removal and Disposal of Hazardous Materials

The general conditions related to removal and disposal of hazardous materials require that hazardous materials, including asbestos, lead, or polychlorinated biphenyls, are managed safely and in compliance with federal, state, and local regulations related to these materials. Before construction begins, a hazardous materials survey must be conducted to identify materials that require specialized handling. If hazardous materials are present, a contractor licensed for abatement and removal activities must be employed to conduct such activities. During construction, the general specifications require containment zones to be established and all construction personnel to be trained and provided appropriate personal protective equipment. Waste manifests must document the proper transportation and disposal of hazardous materials. Once removal activities are complete, air and surface clearance testing is required to confirm the area is free of contamination.

Board Policies and Administrative Procedures

Board Policies 3505 (Emergency Response Plan) and 7415 (Fire, Earthquake, and Disaster Safety) direct the Chancellor to establish procedures that ensure that the District implements a plan to be activated in the event of an emergency or the occurrence of a natural disaster or hazardous condition. This plan must comply with the National Incident Management System, the Standardized Emergency Management System, and should incorporate the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, and other relevant programs. The plan must also identify training requirements for District employees depending on their assigned roles within the emergency plan. Refer to Section 3.18.2.3 for further detail on the City College Emergency Response Plan developed in response to these policies.

Board Policy 6800 (Occupational Health and Safety) authorizes the District Chancellor to create and implement an Occupational Health and Safety Program. The program consists of appropriate policies, programs, and procedures to:

1. Identify and evaluate all workplace hazards, including methods to mitigate identified hazards.

2. Delegate responsibility for the implementation and enforcement of the District's Injury and Illness Prevention Plan at each of the District's places of operation.

3. Train all employees, supervisors, and managers in the recognition of workplace hazards and proper safe work practices.

4. Ensure that all employees will comply with safe work practices.

5. Create a system of communications between management and employees to promote a safe working environment, including means for employees to inform the District of potential hazards without the fear of retaliation.

6. Investigate the causes of accidents and illnesses.

7. Correct unsafe or unhealthy conditions or practices in a timely manner.

City College Hazardous Materials Business Plan

As required by the California Health and Safety Code regulations described above, the District has developed a HMBP for the City College campus (District 2025). This plan provides the written employee training plan for hazardous materials safety and emergency response on campus. The HMBP describes procedures for the safe handling of hazardous materials, including hazardous waste; directions for the use of emergency response equipment and materials; procedures for coordination with local emergency response organizations when necessary; and emergency response procedures for a release or threatened release of hazardous materials.

3.8.2.5 Local (Non-Regulatory)

While the District is not subject to local zoning or land use planning documents, the campus is located adjacent to the City's right-of-way (ROW) and could require work within these areas. Hazards on campus or in adjacent parts of the City may also require coordination between the District and City. Therefore, a summary of City policies related to hazards and hazardous materials is provided below.

San Diego Municipal Code Hazardous Materials

The San Diego Municipal Code Hazardous Waste Establishment regulations (Chapter 4, Article 2, Division 8) enable the Health Officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled, and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials regulations (Chapter 4, Article 2, Division 9) establish a system for the provision of information on potential hazards or hazardous materials in the community, including appropriate education and training.

San Diego Municipal Code Public Right-of-Way

Chapter 6, Article 2, Division 12 of the San Diego Municipal Code governs excavation in the public ROW within the City and establishes that traffic control is required for any project that encroaches into the public ROW. This includes public improvement projects, construction activities, and all other work occurring within City ROW areas such as sidewalks, streets, alleys, medians, and parking spaces. The intent of this section is to ensure public safety, maintain traffic flow, and coordinate temporary disruptions to the transportation network. Obtaining a Public Right-of-Way Permit requires submittal of

a Traffic Control Plan meeting California Manual on Uniform Traffic Control Devices and City standards as a condition of permit approval.

3.8.3 Thresholds of Significance

Thresholds used to evaluate potential hazards and hazardous materials impacts are based on CEQA Guidelines Appendix G. A significant impact related to hazards or hazardous materials could occur if implementation of the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

2. 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;

3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

4. 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, create a significant hazard to the public or the environment;

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

6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.8.4 Impact Analysis

3.8.4.1 Transport, Use, Disposal of Hazardous Materials

Threshold 1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Discussion

Program-Level

Construction activities under the FMP would involve the routine transport, use, and disposal of hazardous materials, including fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. These materials are typical of construction activity and contractors using such materials during construction would be required to adhere to the proper storage, handling, and disposal procedures in accordance with applicable federal, state, and District regulations. In addition, the location of material

storage and construction staging areas for each project would be dictated by a Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP), which would include additional storage and containment measures such as requiring the regular maintenance of construction equipment and providing storage criteria for oil, gasoline, and other potential contaminants that are commonly used during construction activities. While these substances could pose a potential health risk to construction workers and to the public during transport, the storage, transport, handling, and disposal of these materials would occur in accordance with applicable federal, state, County and District regulations. Based on compliance with regulatory requirements, FMP implementation would not result in a significant hazard to the public or environment through the transport, use, or disposal of construction-related hazardous materials.

The expansion of campus facilities could lead to a long-term increase in the amount of hazardous materials used on campus. However, the types of hazardous materials used at City College would remain similar to those used under existing conditions, since future projects implemented under the FMP would be similar to existing campus land uses. The quantities of common hazardous materials that are used for cleaning, maintenance, and landscaping activities would increase incrementally as additional building and landscape areas are added to campus. Campus operations that require less common types of hazardous materials include laboratory uses, vehicle maintenance, and agricultural activity on campus. The new Maintenance and Operations offices and storage areas along with new Seeds@City spaces would relocate maintenance, including vehicle maintenance, and agricultural activities that may use hazardous materials. No specific changes to laboratory programming are proposed under the FMP, though future increases in on-campus enrollment could slightly increase the use of hazardous materials in campus laboratories. The relocation of hazardous materials use and storage and the slight increase in the quantities of these materials that are used would not create a significant hazard to the public or the environment as management of these materials would continue to occur in accordance with applicable federal, state, County, and District regulations as outlined in the City College HMBP (District 2025). The City College program directing use and storage of chemicals would be updated where relevant to reflect changes in the locations of hazardous materials and associated disposal or shutoff locations. Adherence to all applicable regulations would ensure that the hazardous materials used for campus operations are properly managed such that no substantial hazards to the public or the environment occur. Therefore, implementation of the FMP would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

Project-Level

As is the case for all projects under the FMP, implementation of near-term projects would require construction activities that involve the routine transport, use, and disposal of hazardous materials. Project construction activities would comply with the applicable federal, state, County, and District regulations for the storage, handling, and disposal of these materials. The transport of hazardous materials would also be subject to applicable regulations to minimize potential risks to construction workers and the general public. In addition, the small increase in quantities of hazardous materials that would be used for maintenance activities for the near-term projects would be consistent with the materials used under existing conditions and their use would continue to be subject to the same applicable regulations. Based on compliance with regulatory requirements, the near-term projects proposed under the FMP would not result in a significant hazard to the public or environment through the transport, use, or disposal of hazardous materials.

Level of Significance Prior to Mitigation

Given adherence to applicable federal, state, County, and District regulations, future projects implemented under the FMP, including the near-term projects, would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.4.2 Accidental Release of Hazardous Materials

Threshold 2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Discussion

Program-Level

During construction activities, accidental spills of fuels, lubricants, and other equipment-related liquids classified as hazardous materials could occur. However, as discussed above in Section 3.8.4.1, hazardous construction material storage and staging would be managed by project specific SWPPPs or WPCPs, which would include measures to securely store hazardous materials to avoid accidental spills and establish protocols to follow if a spill occurs. Additionally, existing federal, state, and District standards and regulations are in place for the handling, storage, and transport of these materials; therefore, project construction would not result in reasonably foreseeable upset or accident conditions related to hazardous materials used for construction equipment and processes.

However, implementation of the FMP would involve the demolition of various buildings, many of which were constructed when fewer regulations on building materials were in effect. Federal regulations banned the use of LBPs for residential structures in 1978, which limited the manufacture of LBPs for all structure types. Regulations banning asbestos have continued to evolve as recently as 2024, though the USEPA rule first issued in 1989 (then later remanded) began the phase-out of ACMs in many industries. Due to the age of the structures proposed for demolition, there is potential for the presence of LBPs or ACMs in these structures and proposed demolition activities could result in the release of LBP and ACMs, if they are present. As detailed in the District Standards and Guidelines Manual, a hazardous materials survey is required to identify materials that require specialized handling prior to demolition of campus building. If hazardous materials are identified, the District employs a contractor licensed for abatement and removal of the identified hazards to manage construction involving these materials as required by USEPA and California Division of Occupational Safety and Health regulations. Demolition and associated waste disposal would also occur in accordance with the applicable regulations for managing hazardous building materials, which would protect construction workers, the general public, and the environment from adverse effects resulting from the release of LBPs or ACMs.

As discussed further in Section 3.8.4.1 above, hazardous materials would be used across campus for cleaning, maintenance, landscaping, laboratories, and other operational activities. The storage and use of hazardous materials would be subject to the applicable regulations detailed in the campus HMBP to prevent potential accident conditions. For small incidental spills, the employee responsible can handle the spill only if appropriately trained and equipped. In addition, safety equipment such as eyewashes, safety showers, fire extinguishers, first aid kits, and spill response kits are available on campus to

address accident conditions. In the event of an accidental release emergency that cannot be readily contained, procedures are set in place in the HMBP for contacting District Police to initiate the Emergency Response Plan if deemed appropriate and conducting evacuation and/or coordination with local emergency responders as necessary (District 2025). Based on regulatory compliance, project operation would not create a significant hazard to the public or environment through accidental release of hazardous materials.

Project-Level

As is the case for all projects under the FMP, implementation of the near-term projects would involve construction activities that have the potential to result in accidental spills of equipment-related liquids classified as hazardous materials. Demolition of existing structures could also result in the release of LBP or ACMs. However, construction would occur in accordance with applicable federal, state, County, and District standards and regulations in place for the handling, storage, disposal, and transport of these materials. Similarly, the small increase in the quantities of hazardous materials used for near-term project operations would not increase the potential for upset or accident conditions, and hazardous materials use would continue to be subject to applicable regulations and the campus HMBP. Based on compliance with regulatory requirements, the near-term projects proposed under the FMP would not 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.

Level of Significance Prior to Mitigation

Given adherence to applicable federal, state, County, and District regulations, future projects implemented under the FMP, including the near-term projects, would not result in 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. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.4.3 Hazards to Schools

Threshold 3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Discussion

Program-Level

Three San Diego Unified School District schools are within or adjacent to the City College campus. Two of these, East Village Middle College High School and Garfield High School, are located within the City College campus. The third, San Diego High School, is located adjacent to the City College campus, east of North Campus and north of South Campus. In addition, the Early Education Center on campus hosts preschool services. Lastly, the Urban Discovery Academy is approximately 0.15 mile south of the City College campus.

While multiple schools occur within 0.25 mile of the project site, the project would not result in substantial hazards to students. As described above, construction activities would require the temporary use and storage of hazardous materials during construction, and project operations would require the continued use and storage of hazardous materials used for cleaning, maintenance, landscaping,

laboratories, and other operational activities. In addition, the types of hazardous materials used on campus would not change with the project. The use of hazardous materials during construction and operations would occur in accordance with applicable federal, state, County, and District regulations intended to protect the public from adverse effects resulting from hazardous materials. Construction activities associated with relocation of East Village Middle College High School would be subject to the same hazardous materials controls. Therefore, the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Project-Level

As is the case for all projects under the FMP, implementation of the near-term projects would require the use and storage of hazardous materials during construction and operations. No new types of hazardous materials are anticipated to be required for the near-term projects and the small increase in the quantities of hazardous materials used for near-term project operations would not change potential hazards to schools. The near-term projects would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.

Level of Significance Prior to Mitigation

Given adherence to applicable federal, state, and District regulations, future projects implemented under the FMP, including the near-term projects, would not result in significant hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.4.4 Listed Hazardous Materials Sites

Threshold 4: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Discussion

Program-Level

The project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As described in Section 3.8.1, a search of hazardous materials site databases identified one open Cleanup Program site and one open evaluation site near campus, 1,000 feet and 630 feet from the City College campus, respectively. The project site itself was not included on the list of hazardous materials sites and the identified hazards were related to on-site soils that are not anticipated to pose a risk to the project site. As no open hazardous materials sites are located within the project site, the project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Project-Level

The near-term projects would be located within the City College campus described in the program-level analysis above. Therefore, the near-term projects would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not occur on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would not create an associated hazard to the public or the environment. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.4.5 Airport Hazards

Threshold 5: 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?

Impact Discussion

Program-Level

As described in Section 3.8.1, the project site is within the AIA of the San Diego International Airport. The majority of the project site is within the 60-65 dB CNEL noise contour for the airport or outside or any noise contour. However, the Athletics, Exercise, Science, and Health Building (Building P), Fitness Center (Building P-2), tennis courts, Betty Hock softball field, and soccer field fall within the 65-70 dB CNEL noise contour. In addition, the northern portions of the Betty Hock softball field and soccer field fall within the 70-75 dB CNEL noise contour. See Figure 3.8-1.

According to the San Diego International Airport ALUCP, the campus land use category "School for Adults – College, University, Vocational/Trade School" is conditionally compatible with the 60-65, 65-70, and 70-75 dB CNEL noise contours. For projects within these noise contours, buildings must be capable of attenuating exterior noise to 45 dB CNEL with windows and doors closed. For projects within the 65-70 or 70-75 dB CNEL noise contours, an avigation easement must also be dedicated to the airport owner/operator (SDCRAA 2025). The interior noise requirement of the ALUCP would be achieved through adherence to the District acoustical performance and sound transmission requirements for wall construction further detailed in the District Design Guidelines and Standards Manual. The interior noise compatibility limit of 45 dB CNEL is also less stringent than the District goal to achieve interior noise levels of 35 dB in classrooms and 40 dB in shared spaces. Therefore, future projects implemented under the FMP would be compatible with the airport noise environment at the project site and the project would not result in excessive noise for people residing or working in the project area.

Relative to airport safety, the majority of the project site is outside of the San Diego International Airport Safety Zones. Only the northern-most portions of the Betty Hock softball field and soccer field fall within Safety Zone 4E designated for the San Diego International Airport (see Figure 3.8-2). According to the ALUCP, sport facilities are compatible within Safety Zone 4E if development intensity does not exceed the maximum compatible nonresidential intensity of 240 people per acre (SDCRAA 2025). While replacement and modifications to the existing fields are proposed under the FMP (see

project-level discussion of North Campus Athletic Fields project below), no change in the land use of this area is proposed and the development intensity would not conflict with the limits provided in the ALUCP. Therefore, the FMP would not result in a safety hazard for people residing or working in the project area.

Project-Level

Building A Expansion

The Building A Expansion project would take place, partially, within the San Diego International Airport's 60-65 dB CNEL noise contour (see Figure 3.8-1). As such, the project's development would be conditionally compatible with the requirement that buildings must be capable of attenuating interior noise to 45 dB CNEL with windows and doors closed. With incorporation of building materials with the appropriate sound transmission class rating as required by the District Design Guidelines and Standards Manual, the Building A Expansion project would achieve this ALUCP requirement and would not result in excessive noise exposure for people residing or working in the project area. This project would be located outside of the airport's safety contours (see Figure 3.8-2) and would not result in a safety hazard.

Performing Arts Center

The Performing Arts Center project would take place outside of the San Diego International Airport's noise and safety contours (see Figures 3.8-1 and 3.8-2). As such, the Performing Arts Center project would not result in a safety hazard or excessive noise for people residing or working in the project area.

North Campus Athletic Fields

The North Campus Athletic Fields project would occur within the San Diego International Airport's 65-70 and 70-75 dB CNEL noise contours. Based on the use of this portion of campus for recreation rather than classroom facilities, the "Recreation Facility - Outdoor" and "Sport/Fitness Facility" land use types from the ALUCP were considered appropriate for this project. These land use types are compatible within the 60-65 or 65-70 dB CNEL contours and conditionally compatible within the 70-75 and 75+ dB CNEL contours, provided interior noise levels in office areas or indoor meeting rooms are attenuated to 50 dB CNEL. Offices and meeting rooms are not proposed as part of the North Campus Athletic Fields project; interior space would be limited to field houses, primarily serving as storage and restroom facilities though an announcer's booth would also be included. As such, the North Campus Athletic Fields project would be compatible with the airport noise environment and would not expose people in the project area to excessive noise.

In addition, the northern-most portions of the softball field and soccer field fall within Safety Zone 4E for the San Diego International Airport (see Figure 3.8-2). Standard community college land uses (School for Adults - College, University, Vocational/Trade School) would be conditional in this zone, with the requirement that development intensity does not exceed 240 people per acre; however, the existing and proposed outdoor recreation facility land use types (Recreation Facility – Outdoor) are compatible with Safety Zone 4E. No change in the land use of this area is proposed and the project improvements to the existing fields would not increase the development intensity of this area. Therefore, the North Campus Athletic Fields project would not result in a safety hazard for people residing or working in the project area.

Level of Significance Prior to Mitigation

Projects under the FMP, including the near-term projects, would adhere to the requirements of the San Diego International Airport ALUCP and the project would not result in a safety hazard or excessive noise for people residing or working in the project area. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.4.6 Emergency Response and Evacuation Plans

Threshold 6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

Program-Level

As future FMP projects would be constructed within the campus boundaries, construction work would not substantially impair emergency response or evacuation plans which direct evacuation towards major City roads. The County of San Diego has prepared a Multi-Jurisdictional Hazard Mitigation Plan to address hazards that threaten the County (including the City), determine likely impacts, and set mitigation goals and strategies for emergencies such as dam failures, floods, earthquakes, drought, liquefaction, landslides, wildfires, and other severe weather events. The project would not prevent the County or City from implementing the risk mitigation measures identified in the Multi-Jurisdictional Hazard Mitigation Plan. As discussed in Section 3.8.1.2, evacuation routes near the City College campus include I-5, 11th Avenue, and Ash Street. Long-term implementation of the FMP would result in minor adjustments along some of these roadways that border campus; however, such changes would be limited to pedestrian enhancements and curb adjustments that would not prevent their continued use as emergency evacuation routes.

Once operational, FMP projects would not conflict with campus emergency response or evacuation plans. The District has developed its Emergency Communications Response Plan (Administrative Procedure 7415.2) which implements Board Policy 7415, Fire, Earthquake and Disaster Safety, to ensure dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. In addition, City College has developed its Emergency Response Plan, which outlines how the City College campus prepares for, communicates during, and responds to a wide range of emergencies to protect students, employees, and visitors. The evacuation plans that comprise a portion of the overall Emergency Response Plan would be updated with evacuation routes for new campus buildings as they are constructed but no impairment of these plans would occur as a result of FMP implementation.

During construction activities, however, there is potential for staging or construction to result in temporary changes to emergency access and public roadways. For construction that would occur within the City ROW, such as for connections to existing utilities or pedestrian alterations within City streets, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan to ensure emergency access is maintained on City streets. During construction occurring outside of City ROWs, construction-related road closures could interfere with emergency access within the campus. While the District intends to maintain emergency access by clearly delineating the limits of construction work and providing signage where temporary

circulation changes are required, these procedures are not mandated by law. Therefore, during construction, future FMP projects could temporarily impair emergency response or evacuation plans during construction.

Project-Level

The near-term projects proposed under the FMP would not cause a direct increase in the campus' population but would result in additional building area on the City College campus which could affect the existing emergency response framework for the campus. Construction of the near-term projects could result in changes to emergency access within campus and on adjacent City roadways. While temporary work affecting City streets would be subject to a Traffic Control Plan prepared to the satisfaction of the City, the preparation of a similar plan for on-campus circulation is not mandated by existing policies. Therefore, on-campus construction could temporarily impair emergency access.

The near-term projects would be constructed within the existing campus and would not conflict with City or County evacuation or response plans. Once operational, each of these near-term projects would be incorporated into the City College campus evacuation plans. Therefore, operation of the near-term projects would not impair an adopted emergency response plan or emergency evacuation plan.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not substantially impair an adopted emergency response plan or emergency evacuation plan but could interfere with emergency access to campus through construction-period road closures on campus. **Program-level and project-level impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

Mitigation measure TRA-1, provided in Section 3.15.4.4, which would require notifications, identification of alternative emergency routes, and implementation of appropriate signage in the event of on-campus lane or roadway closures, would apply to future campus projects.

Project-Level

Mitigation measure TRA-1, provided in Section 3.15.4.4, would apply to each of the near-term projects.

Level of Significance After Mitigation

Implementation of mitigation measure TRA-1 would reduce program-level and project-level impacts related to construction-period emergency access to a level that is **less than significant**.

3.8.4.7 Wildland Fires

Threshold 7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact Discussion

Program-Level

As described in Section 3.8.1.4, North Campus occurs within a VHFHSZ and the Wildland Urban Interface (WUI) while South Campus is not located within an area with designated fire risk. While future projects implemented within North Campus would be exposed to wildland fire risk, these projects would not exacerbate the risk of fire in this area as they would continue the athletic, classroom, and parking land uses that occur in this area under existing conditions. In addition, the future projects would not expand human development beyond previously developed areas and into wildland areas. Rather, new construction in this area would replace existing development and would be constructed to the more stringent building code requirements that have been developed and enacted since the construction of existing buildings on North Campus. Compliance with the CBC, CWUIC, and CFC requirements related to fire, specifically those addressing construction within VHFHSZs, would require the use of ignition-resistant materials, the installation of automatic fire sprinkler and alarm systems, establishment of defensible space, and the inclusion of fire access roads. Refer to Section 3.18, *Wildfire*, for further discussion and analysis of wildfire risk and related building code requirements. Overall, implementation of the FMP would not increase the risk of loss, injury, or death involving wildland fires within the project site.

Project-Level

The North Campus Athletics Fields project would be located within a VHFHSZ while the Performing Arts Center project and Building A Expansion project would not be located within a VHFHSZ (refer to Figure 3.18-1). Each of these projects would be constructed in accordance with the fire safety requirements, including those requirements specific to VHFHSZs for the North Campus Athletics Fields project as applicable. Refer to Section 3.18, *Wildfire*, for further discussion and analysis of wildfire risk. Therefore, the near-term projects would not result in a significant risk of loss, injury, or death involving wildland fires.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.8.5 Cumulative Impact Analysis

Impacts related to hazards and hazardous materials are generally site-specific, as risks associated with hazards and hazardous materials in one location do not result in risks elsewhere. Therefore, the geographic area for the analysis of cumulative impacts related to hazards and hazardous materials consists of properties adjacent to the City College campus.

3.8.5.1 Transport, Use, Disposal of Hazardous Materials

Similar to the proposed FMP, cumulative development projects would require the transportation, use, and disposal of hazardous materials. However, like projects implemented under the FMP, cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials. Through the proper handling and storage of hazardous materials in accordance with these regulations and/or activity-specific permit conditions, cumulative projects would not result in a hazard to the public or the environment. Therefore, cumulative impacts related to the transport, use, and disposal of hazardous material would be **less than significant.**

3.8.5.2 Accidental Release of Hazardous Materials

Similar to the proposed FMP, cumulative development projects would require the use and storage of hazardous materials, which carries the potential to result in the accidental release of hazardous materials. However, like projects implemented under the FMP, cumulative projects would be required to comply with all applicable federal, state, and local regulations or permit conditions related to the handling and storage of hazardous materials, including the requirements for spill containment and cleanup procedures as well as hazardous building material removal (such as LBP and ACMs). The proper handling and storage of hazardous materials would minimize the potential for accidental spills, while implementation of spill containment and cleanup procedures would prevent significant hazards to the public or the environment in the event of accidental spills. As such, cumulative impacts would be **less than significant**.

3.8.5.3 Hazards to Schools

Similar to the proposed FMP, cumulative development projects could use or emit hazardous materials and could be located within a quarter mile of schools. However, like projects implemented under the FMP, cumulative projects would be required to comply with all applicable federal, state, and local regulations related to the handling and storage of hazardous materials, which are intended to protect all populations from these hazards, including students. Through the proper handling and storage of hazardous materials, cumulative projects would not result in a hazard to schools. Therefore, cumulative impacts related to hazards to schools would be **less than significant.**

3.8.5.4 Listed Hazardous Materials Sites

As discussed in Section 3.8.4.4, the City College campus is not a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Future cumulative projects could be proposed on properties that contain these hazardous sites. However, in these cases, projects would undergo project-level review, potentially including the preparation of Phase I and/or Phase II Environmental Site Assessment or similar studies to evaluate the condition of the identified hazard. A cumulative project that proposes development of a potential hazardous materials site would be required to remediate the existing site contamination consistent with applicable regulations and under the oversight of the applicable regulatory agency prior to occupancy. With adherence to regulations, cumulative impacts resulting from development of hazardous materials sites would be **less than significant**.

3.8.5.5 Airport Hazards

As discussed in Section 3.8.4.5, the City College campus is within the noise exposure range and safety zone contours of the San Diego International Airport. Similarly, cumulative projects could be proposed within these contours or similar contours from other airports in the region. As is the case for the FMP projects, cumulative projects would be required to achieve compliance with the ALUCP compatibility criteria relevant to their respective airport, location within noise or safety contours, and proposed land use type. With adherence to requirements and regulations outlined in ALUCPs, cumulative impacts related to airport hazards would be **less than significant**.

3.8.5.6 Emergency Response and Evacuation Plans

Construction of future cumulative development projects in the City could result in interference with emergency response or evacuation plans during temporary construction activities that block access routes. Such projects would also be required to provide adequate emergency access in accordance with the CFC and CBC. However, no cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that access to existing emergency evacuation routes would be eliminated. Development within the City College campus would not physically interfere with emergency response or evacuation plans because the FMP, including the near-term projects, would not include features that prevent continued implementation of these plans. In addition, the projects implemented under the FMP would be subject to the requirements of the City's ROW Permit for work within public roads, which would include the requirement to prepare a Traffic Control Plan, or mitigation measure TRA-1 for work within the campus. These requirements would ensure the maintenance of emergency access during construction. Similarly, cumulative development projects within the City would be required to comply with relevant City policies related to circulation under a Traffic Control Plan to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency response and evacuation plans would be **less than significant**.

3.8.5.7 Wildland Fires

Similar to the proposed FMP projects, cumulative development projects could be located within or adjacent to VHFHSZs. Cumulative development projects within the City would be required to adhere to all regulatory requirements in place to minimize wildfire hazards due to construction in these areas, including compliance with the relevant sections of the CFC, CWUIC, and CBC, and establishment of defensible space to prevent the spread of wildfire. While cumulative projects could increase the amount of development in VHFHSZs throughout the City, adherence to the applicable regulatory requirements would reduce potential risks to people and property. Therefore, cumulative impacts related to wildland fire risk would be **less than significant**.

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3.9 Hydrology and Water Quality

This section addresses the potential hydrology and water quality impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to hydrology and water quality are also addressed.

3.9.1 Environmental Setting

3.9.1.1 Hydrology and Drainage Conditions

The San Diego region is divided into two hydrologic basins by the northwest-trending Peninsular Range. The San Diego Hydrologic Basin is on the gently sloping western side of the range, and the Colorado River Hydrologic Basin is on the steep eastern side. The San Diego Hydrologic Basin is divided into hydrologic units (HUs), which are entire watersheds made up of one or more rivers or streams. Each HU, or watershed, is divided into hydrologic areas (HAs), which are the major tributaries or major groundwater basins within the watershed. Hydrologic subareas (HSAs), which include water-bearing and non-water-bearing formations, are major subdivisions of HAs.

The San Diego Hydrologic Basin includes 11 HUs: Carlsbad, San Dieguito, Los Peñasquitos, San Diego, Pueblo San Diego, Sweetwater, Otay, San Luis Rey, San Juan, Santa Margarita, and Tijuana. All 11 of these HUs ultimately drain towards the west into the Pacific Ocean. The City College campus lies within the Pueblo San Diego HU, which covers approximately 60 square miles and has no central stream system. The Pueblo San Diego HU is further divided into three distinct HAs: Point Loma, San Diego Mesa, and National City. The campus lies within the San Diego Mesa HA and the Lindbergh HSA as defined by the San Diego Regional Water Quality Control Board (RWQCB). Within the San Diego Mesa HA, residential land uses comprise the majority (40 percent) of the land uses, followed by transportation (29 percent), commercial/office business (8 percent), industrial businesses (5 percent), open space/preserves (6 percent). The remaining 12 percent of land area consists of multiple uses, including public facilities, schools, and parks (City of Chula Vista et al. 2016). Runoff from the City College campus and the surrounding vicinity is currently conveyed through the City of San Diego (City's) stormwater system to outfalls that are ultimately discharged into the San Diego Bay.

The City College campus is also within the San Diego Bay Watershed Management Area (WMA), which is an area that is defined for the purpose of Water Quality Improvement Plan (WQIP) development. The applicable WQIP for the campus is the San Diego Bay WQIP, which covers approximately 444 square miles and includes three HUs: Pueblo San Diego, Sweetwater River, and Otay River. The San Diego Bay WMA supplies many local residents with potable water sourced from one of four reservoirs: the Sweetwater, Loveland, and Upper and Lower Otay reservoirs. Other major water bodies within the San Diego Bay WMA include the Sweetwater River, Otay River, and Chollas Creek. San Diego Bay and rivers, creeks, and lakes in the watershed support swimming, fishing, biking, walking, and other recreational activities (Project Clean Water 2025).

3.9.1.2 Water Quality Conditions

Point Source Pollutants

The U.S. Environmental Protection Agency (USEPA) defines point source pollution as "any single identifiable source of pollution from which pollutants are discharged, such as a pipe, ditch, ship or

factory smokestack." Factories and sewage treatment plants are two common types of point sources. Factories, including oil refineries, pulp and paper mills, and chemical, electronics and automobile manufacturers, typically discharge one or more pollutants in their discharged waters (called effluents). Some factories discharge their effluents directly into a waterbody, while others treat it themselves before it is released or send their wastes to sewage treatment plants for treatment.

Another way that some factories and sewage treatment plants handle waste material is by mixing it with urban runoff in a combined sewer system. As the runoff crosses urban surfaces, it picks up chemicals and pollutants, and this untreated, polluted water then runs directly into a sewer system. When it rains excessively, a combined sewer system may not be able handle the volume of water, and some of the combined runoff and raw sewage will overflow from the system, discharging directly into the nearest waterbody without being treated. This combined sewer overflow is considered point source pollution and can cause severe damage to human health and the environment. Unregulated discharges from point sources can result in water pollution and unsafe drinking water and can restrict activities like fishing and swimming.

To control point source discharges, the Clean Water Act (CWA) established the National Pollutant Discharge Elimination System (NPDES). Under the NPDES program, factories, sewage treatment plants, and other point sources must obtain a permit from the state and USEPA before they can discharge their waste or effluents into any body of water. Prior to discharge, the point source must use the latest technologies available to treat its effluents and reduce the level of pollutants. If necessary, a second, more stringent set of controls can be placed on a point source to protect a specific waterbody (National Oceanic and Atmospheric Administration [NOAA] 2026). Refer to Section 3.9.2.1 below for additional information.

Nonpoint Source Pollutants

Nonpoint source pollution is pollution that originates from diffuse sources rather than a single point of discharge. It is typically generated when rainfall or snowmelt moves over and through the ground and picks up and carries away natural and human-made pollutants, ultimately depositing them into lakes, rivers, wetlands, coastal waters, and groundwater. Common nonpoint source pollutants include: fertilizers, herbicides, and insecticides from agricultural lands and residential areas; oil, grease, and toxic chemicals from urban runoff and energy production; sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks; salt from irrigation practices and acid drainage from abandoned mines; bacteria and nutrients from livestock, pet wastes, and faulty septic systems; and atmospheric deposition and hydromodification. Urbanization can increase the generation and transport of nonpoint source pollutants relative to natural conditions, thereby affecting the water quality of adjacent streams and downstream receiving waters. Accordingly, an important consideration in evaluating stormwater quality is to assess whether nonpoint source pollutants would impair the beneficial uses of receiving waters. While receiving waters can assimilate a limited quantity of various constituent elements, concentrations that exceed applicable thresholds may degrade water quality and result in adverse environmental effects.

Characteristics of Runoff

Standard parameters, which can assess the quality of stormwater, provide a method of measuring impairment. The quantity of a material in the environment and its characteristics determine the degree of availability as a pollutant in surface runoff. In an urban environment, the quantity of certain

pollutants in the environment is a function of the intensity of the land use. For instance, a high density of automobile traffic makes a number of potential pollutants (such as lead and hydrocarbons) more available. The availability of a material, such as a fertilizer, is a function of the quantity and the manner in which it is applied. Applying fertilizer in quantities that exceed plant needs leaves the excess nutrients available for loss to surface runoff or groundwater. Water quality parameters for stormwater comprise a long list and are classified in many ways. Typically, the concentration of an urban pollutant, rather than the annual load of that pollutant, is required to assess a water quality problem.

3.9.1.3 Receiving Waters

Receiving waters is a general term typically used to describe any water body, such as a creek, river, lake, bay, or ocean that receives runoff. The major water feature adjacent to the downtown planning area is the San Diego Bay, which is the largest estuary in San Diego County and has been extensively developed as a port. The majority of freshwater input to San Diego Bay is from urban runoff from developed areas and intermittent flow from rivers and creeks during rain events. As noted above, runoff from the City College campus is conveyed through the City's stormwater conveyance system and ultimately discharged to San Diego Bay.

Beneficial Uses

Beneficial uses are the uses of water necessary for the survival or wellbeing of humans, plants and wildlife, and are outlined below for each of the project's receiving water bodies as defined in the Water Quality Control Plan for the San Diego Basin (Basin Plan; RWQCB 2021).

- **San Diego Bay:** Industrial Service Supply (IND), Navigation (NAV), Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Commercial and Sport Fishing (COMM), Preservation of Biological Habitats of Special Significance (BIOL), Estuarine Habitat (EST), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), Marine Habitat (MAR), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or Early Development (SPWN), and Shellfish Harvesting (SHELL) are existing beneficial uses.

- **Pacific Ocean**: Industrial Service Supply (IND), Navigation (NAV), Contact Water Recreation (REC-1), Non-contact Water Recreation (REC-2), Commercial and Sport Fishing (COMM), Preservation of Biological Habitats of Special Significance (BIOL), Wildlife Habitat (WILD), Rare, Threatened, or Endangered Species (RARE), Marine Habitat (MAR), Aquaculture (AQUA), Migration of Aquatic Organisms (MIGR), Spawning, Reproduction, and/or Early Development (SPWN), and Shellfish Harvesting (SHELL) are existing beneficial uses.

303(d) List and Total Maximum Daily Load Status

Under Section 303(d) of the 1972 CWA, states, territories and authorized tribes are required to develop a list of water quality limited segments. The waters on these lists do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology. The law requires the establishment priority rankings for water on the lists and develop action plans, called Total Maximum Daily Loads (TMDLs), to improve water quality. The San Diego RWQCB is responsible for developing the 303(d) list in the San Diego region.

Waterbodies identified as impaired in the San Diego Bay WQIP include the San Diego Bay, the San Diego Bay Shoreline, and Jamul Creek. There are no pollutants/stressors causing impairment of the Pacific

Ocean Shoreline within the HU, HA, or HSA where City College is located. The 303(d) identifies the following pollutants and/or stressors causing impairment of these waterbodies (State Water Resources Control Board [SWRCB] 2024).

- **San Diego Bay:** The pollutants/stressors causing impairment of the San Diego Bay are mercury, polycyclic aromatic hydrocarbons, and polychlorinated biphenyls.

- **San Diego Bay Shoreline:** The pollutants/stressors causing impairment of the San Diego Bay Shoreline are benthic community effects, sediment toxicity, copper, total coliform, polycyclic aromatic hydrocarbons, mercury, polychlorinated biphenyls, zinc, chlordane, Enterococcus, indicator bacteria, and toxicity.

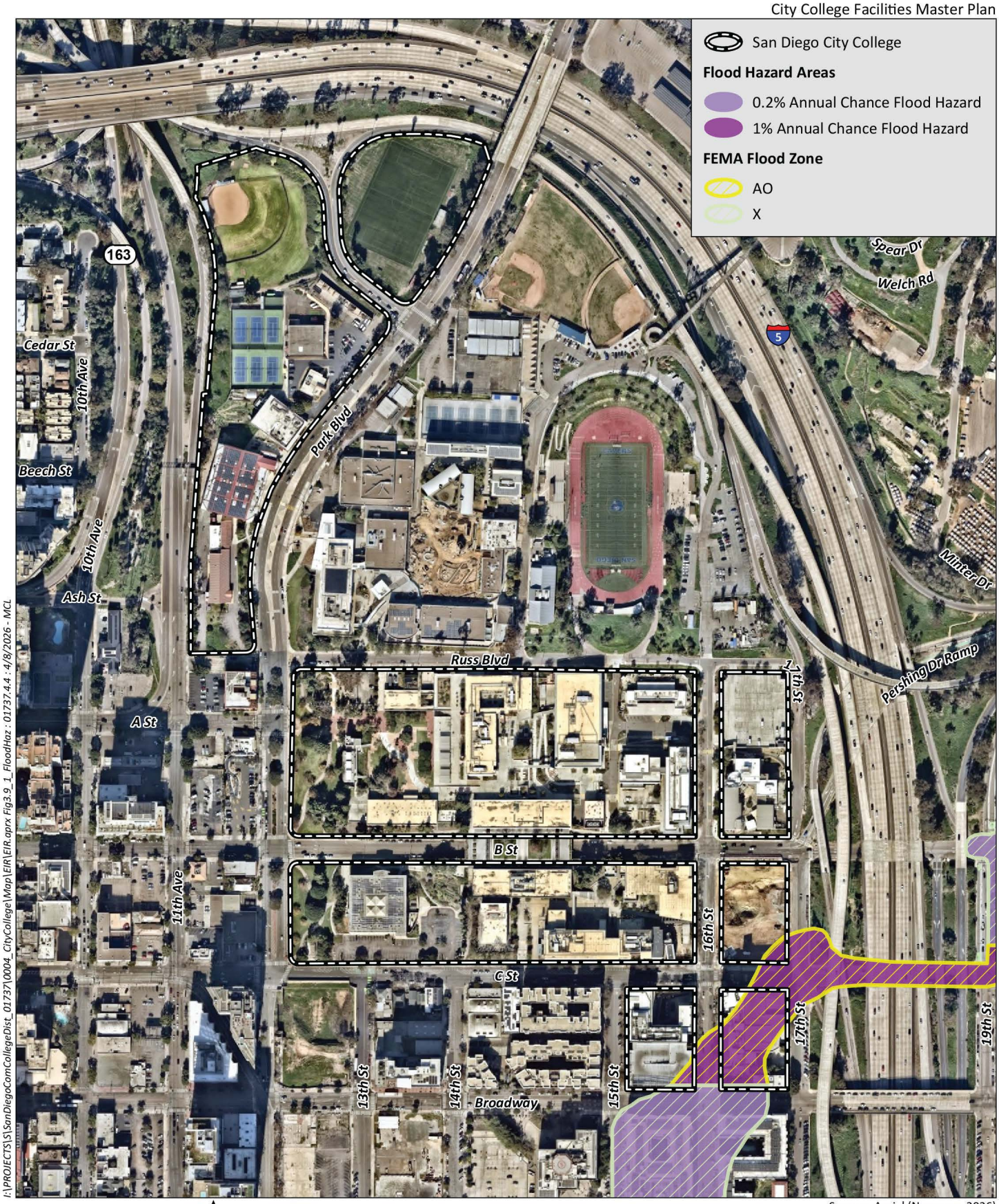
- **Jamul Creek:** The pollutant/stressor causing impairment of Jamul Creek is toxicity.

3.9.1.4 Regional Groundwater Quality

The City College campus is located within the Coastal Plain of the San Diego Groundwater Basin (9-033). This basin underlies the cities of San Diego, National City, Chula Vista, Imperial Beach, and San Ysidro in southwestern San Diego County (Department of Water Resources [DWR] 2020a). The basin is bound on the north by the alluvium of the Mission Valley Basin, on the south by the international border with Mexico, on the west by the San Diego Bay and the Pacific Ocean, and on the east by the La Nacion fault and the lateral extents of the San Diego Formation and the alluvial areas in Otay Valley and Sweetwater Valley. The surface waters that provide recharge to the basin are drained westerly towards the Pacific Ocean by the Sweetwater River, the Otay River, the Tijuana River, and various creeks (DWR 2018). According to DWR mapping prepared pursuant to the Sustainable Groundwater Management Act (SGMA), the San Diego Groundwater Basinis considered a Low Priority basin; therefore, no groundwater sustainability plan is required to be implemented for this basin (DWR 2020a).

3.9.1.5 Floodplain Mapping

The northern portion of campus is included on Flood Insurance Rate Map (FIRM) Number 06073C1882G, dated May 16, 2012, and is identified as an Area of Minimal Flood Hazard located in Zone X (Federal Emergency Management Agency [FEMA] 2012). The southeastern portion of campus is published on FIRM Number 06073C1884H, dated December 20, 2019, and is primarily an Area of Minimal Flood Hazard but partially within the Switzer Creek 100-year floodplain, which is designated as Zone AO (FEMA 2019). Switzer Creek is not a natural channel in this area; flood discharge is contained in a belowground structure. Specifically, Zone AO is mapped across portions of the three southeastern-most blocks of the City College campus, which contain the Mathematics and Social Sciences building (Building MS), Career and Technology Center (Building V), as well as parking structures and the future Affordable Student Housing project. See Figure 3.9-1, *Special Flood Hazard Areas*. Zone X is defined as areas of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods, and low flood hazard (outside of both the 100-year and 500-year floodplain). The Zone X designation is also used to identify base floodplains of lesser hazards, such as areas protected by levees from the one percent annual flood, or shallow flooding areas with average depths of less than one foot or drainage areas less than one square mile. Zone AO is defined by river or stream flood hazard areas, and areas with a 1 percent or greater chance of shallow flooding each year, usually in the form of sheet flow, with an average depth ranging from 1 to 3 feet.



I:\PROJECTS\S\SanDiegoComCollegeDist_01737\0004_CityCollege\Map\EIR\EIR.aprx Fig3.9_1_FloodHaz : 01737.4.4 : 4/8/2026 - MCL

0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Special Flood Hazard Areas

Figure 3.9-1

3.9.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to hydrology and water quality is provided below.

3.9.2.1 Federal

Clean Water Act

The principal law governing pollution of the nation's surface waters is the Federal Water Pollution Control Act (i.e., the CWA). Originally enacted in 1948, it was amended in 1972 and has remained substantially the same since. The CWA consists of two major parts: provisions that authorize federal financial assistance for municipal sewage treatment plant construction and regulatory requirements that apply to industrial and municipal dischargers. The CWA authorizes the establishment of effluent standards on an industry basis. The CWA also requires states to adopt water quality standards that "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the NPDES, effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. The USEPA has delegated the responsibility for the administration of portions of the CWA to state and regional agencies.

Impaired Water Bodies

CWA Section 303(d) and California's Porter-Cologne Water Quality Control Act (described below) require that the state establish the beneficial uses of its state waters and adopt water quality standards to protect those beneficial uses. Section 303(d) establishes a TMDL, which is the maximum quantity of a contaminant that a water body can maintain without experiencing adverse effects, to guide the application of state water quality standards. Section 303(d) also requires the state to identify "impaired" streams (water bodies affected by the presence of pollutants or contaminants) and to establish the TMDL for each stream.

National Pollutant Discharge Elimination System

To achieve its objectives, the CWA is based on the concept that all discharges into the nation's waters are unlawful, unless specifically authorized by a permit. The NPDES is the permitting program for the discharge of pollutants into surface waters of the U.S. under CWA Section 402. Thus, industrial and municipal dischargers (point source discharges) must obtain NPDES permits from the appropriate RWQCB (i.e., the San Diego RWQCB in the project region). The existing NPDES (Phase I) stormwater program requires municipalities serving more than 1,000,000 persons to obtain an NPDES stormwater permit for any construction project larger than five acres. Proposed NPDES stormwater regulations (Phase II) expand this existing national program to smaller municipalities with populations of 10,000 persons or more and construction sites that disturb more than one acre. For other dischargers, such as those affecting groundwater or from non-point sources, a Report of Waste Discharge must be filed with the RWQCB. For specified situations, some permits may be waived, and some discharge activities may be included in an existing General Permit.

National Flood Insurance Program

Congress passed the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973, which are intended to reduce the need for large, publicly-funded flood control structures and disaster relief by restricting development on floodplains.

The National Flood Insurance Program (NFIP) provides a means for property owners to financially protect themselves from flood damage. The NFIP offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. The City is a participant and must adhere to the NFIP. The District is not a separate participant in the NFIP but may obtain flood insurance and rely on maps prepared to identify flood hazards in the City.

Through its Flood Hazard Mapping Program, FEMA identifies flood hazards, assesses flood risks, and partners with states and communities to provide accurate flood hazard and risk data. Flood hazard mapping is an important part of the NFIP, as it is the basis of the NFIP regulations and flood insurance requirements. FEMA maintains and updates data through FIRMs and risk assessments. A FIRM is an official map of a community on which FEMA has delineated both the special hazard areas and the risk premium zones applicable to the community.

A Special Flood Hazard Area is an area within a floodplain having a one percent or greater chance of flood occurrence within any given year (commonly referred to as the 100-year flood zone). Special Flood Hazard Areas are delineated on flood hazard boundary maps issued by FEMA. The Flood Disaster Protection Act of 1973 and the National Flood Insurance Reform Act of 1994 make flood insurance mandatory for most properties in Special Flood Hazard Areas.

3.9.2.2 State

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, although it establishes certain guidelines for states to follow in developing their programs and allows the USEPA to withdraw control from states with inadequate implementation mechanisms.

California's primary statute governing water quality and water pollution issues with respect to both surface waters and groundwater is the Porter-Cologne Water Quality Control Act (California Water Code Section 13000, et seq.). The Porter-Cologne Water Quality Control Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

Each RWQCB must formulate and adopt a water quality control plan for its region. The regional plans must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its state water policy. The Porter-Cologne Water Quality Control Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The San Diego RWQCB has adopted the Basin Plan, which is the applicable water quality control plan for the San Diego region and is discussed further in Section 3.9.2.3 below.

California Toxics Rule

The California Toxics Rule is a federal regulation issued by the USEPA providing water quality criteria for potentially toxic constituents in receiving waters with human health or aquatic life designated uses in California. California Toxics Rule criteria are applicable to the receiving water body and therefore must be calculated based on the probable hardness values of the receiving waters for evaluation of acute (and chronic) toxicity criteria. At higher hardness values for the receiving water, copper, lead, and zinc are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

State Water Resources Control Board

The SWRCB administers water rights, water pollution control, and water quality functions throughout the state, while the RWQCBs conduct planning, permitting, and enforcement activities. Construction permitting is administered by the SWRCB, while post-construction permitting is administered by the RWQCB. In California, NPDES permits are also referred to as waste discharge requirements that regulate discharges to waters of the U.S.

Construction General Permit

On November 16, 1990, the USEPA published final regulations that established stormwater permit application requirements for specified categories of industries. The regulations provide that discharges of stormwater to waters of the U.S. from construction projects are effectively prohibited unless the discharge complies with an NPDES Permit. On September 8, 2022, the SWRCB reissued the Construction Stormwater General Permit (Water Quality Order 2022-0057-DWQ).

Projects that disturb one or more acres of soil or are part of a larger common plan that, in total, disturbs one or more acres, are required to obtain coverage under the Construction General Permit. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling or excavation, but does not include regular maintenance activities performed to restore a facility's original line, grade, or capacity. To obtain coverage under the Construction General Permit, Permit Registration Documents, including a Notice of Intent, Risk Assessment, Site Map, and Stormwater Pollution Prevention Plan (SWPPP), among others, must be filed with the SWRCB prior to the commencement of construction activity. The Notice of Intent notifies the SWRCB of the applicant's intent to comply with the Construction General Permit, and the SWPPP includes a list of best management practices (BMPs) that would be used to protect stormwater runoff from pollutant discharge during construction. Additionally, the project's SWPPP must contain a visual monitoring program and a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs.

Municipal Separate Storm Sewer System Permit

The Municipal Separate Storm Sewer System (MS4) Permit is a regulatory program under the federal CWA and California's Porter-Cologne Water Quality Control Act that requires cities, counties, and other permitted agencies to reduce pollutants in stormwater runoff to the maximum extent practicable. The permit mandates a comprehensive stormwater management program that includes public education, construction and post-construction stormwater controls, illicit-discharge detection and elimination, watershed-based planning, and monitoring to ensure compliance with water-quality standards. MS4

permittees must implement BMPs, enforce stormwater ordinances, and integrate low-impact development (LID) strategies to reduce runoff volume and pollutant loads.

The MS4 Phase I regulation requires medium and large cities or certain counties with populations of 100,000 or more individuals to obtain NPDES permit coverage for their stormwater discharges. The San Diego RWQCB regulates discharges from Phase I MS4s under the Regional MS4 Permit, which covers 39 municipal, county, and special district entities within its jurisdiction, including the City of San Diego.

The MS4 Phase II regulation extends NPDES permit coverage to smaller MS4s in urban areas with a population of more than 50,000 people as well as non-traditional MS4s associated with uses such as public universities, departments of transportation, hospitals, or prisons. Many Phase II MS4s are covered by statewide General Permits, though some states issue individual permits. In California, the SWRCB has adopted a general Statewide Small MS4 Permit under which special entities may enroll. The District is not currently an enrolled entity under Order No. 2013-0001-DWQ (RWQCB 2026) but intends to comply with the NPDES regulations through the MS4 Phase II program (refer to Section 3.9.2.4 below).

Sustainable Groundwater Management Act

The SGMA established a framework for sustainable, local groundwater management in 2014. The SGMA requires groundwater-dependent regions to halt overdraft and bring basins into balanced levels of pumping and recharge. With the passage of the SGMA, the DWR launched the Sustainable Groundwater Management Program to implement the law and provide ongoing support to local agencies around the state. The SGMA requires local agencies to form groundwater sustainability agencies for high and medium priority basins and to implement groundwater sustainability plans within 20 years. The DWR maintains the online SGMA Basin Prioritization Dashboard, which identifies the priority of the groundwater basins in California on a scale of Very Low to High based on a point system that considers factors including population, available wells, irrigated acres, and groundwater resilience. Groundwater basins with more than 14 points are considered Medium or High Priority, while basins with 14 or less points are considered Low or Very Low Priority.

The DWR identifies the San Diego Groundwater Basin, where the City College campus is located, as Low Priority, meaning that a groundwater sustainability plan is not required for the San Diego Groundwater Basin (DWR 2020a).

California Building Standards Code

Multiple sections of the California Building Standards Code (California Code of Regulations [CCR] Title 24) include requirements for the construction of buildings or structures in a FEMA-designated flood hazard area. CCR Title 24, Part 2 (California Building Code [CBC]) incorporates American Society of Civil Engineers (ASCE) standards for flood resistant design and construction of buildings in a floodplain. For most building types, a structure must be constructed at least one foot above the base flood elevation, though this elevation is increased for critical facilities. For redevelopment of existing buildings, CCR Title 24, Part 10 provides standards specific to repairs, alterations, or additions. Additional requirements for the location of mechanical equipment and plumbing components of buildings are included in CCR Title 24, Parts 4 and 5. Overall, these requirements meet or exceed the NFIP requirements (DWR 2020b).

3.9.2.3 Regional

Water Quality Control Plan for the San Diego Basin

The Basin Plan, originally adopted in 1994 by the RWQCB with amendments effective on or before September 2021 (RWQCB 2021), sets forth water quality objectives for constituents that could potentially cause an adverse effect or impact on the beneficial uses of water. The Basin Plan contains the water quality objectives, policies, regulations, and implementation programs for the protection of surface and ground waters within the San Diego Region. The Basin Plan describes the beneficial uses that each water body supports and are the basis for San Diego RWQCB regulatory actions. The Basin Plan incorporates by reference all applicable SWRCB and RWQCB plans and policies. Specifically, the Basin Plan is designed to accomplish the following:

- Designate beneficial uses for surface water and groundwater;
- Set the narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's anti-degradation policy;
- Describe implementation programs to protect the beneficial uses of all waters within the region; and
- Describe surveillance and monitoring activities to evaluate the effectiveness of the Basin Plan.

Water Quality Improvement Plan for the San Diego Bay Watershed Management Area

The WQIP for the San Diego Bay WMA is a document developed under the San Diego Regional Municipal Stormwater Permit and the CWA. It outlines a watershed-based strategy to address priority water quality conditions across a highly urbanized drainage area that includes portions of the cities of San Diego, National City, Chula Vista, Coronado, and Imperial Beach. The plan focuses on reducing pollutant loads, particularly bacteria, metals, and toxics, that impair beneficial uses in receiving waters such as San Diego Bay, Chollas Creek, and Paleta Creek. The WQIP identifies bacteria as the highest-priority condition due to its impact on the beneficial use of Contact Recreation (REC-1). The WQIP identifies BMPs such as source control, structural treatment systems, and LID techniques. It also includes numeric goals, load reduction benchmarks, and schedules for implementation, ensuring compliance with TMDLs and regional water quality standards.

3.9.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, Design Guides and Standards, of the District Design Guidelines and Standards Manual includes guidelines for the design of facilities on the District campuses. The following guidelines in this section are related to hydrology and water quality.

Project Programming

The Project Programming section requires the integration of LID concepts where possible into landscaped areas and site improvements to manage stormwater runoff as a resource. Specific implementation techniques include the following:

a. Utilize site design measures to reduce, or replicate, pre-construction water balance.
b. Conserve natural area, soils, and vegetation and minimize disturbances to natural drainage areas.
c. Incorporate landscape designs that promote water retention and evaporation.
d. Maximize the percentage of pervious surfaces for low traffic areas, parking lots, trails, and pedestrian walkways to allow percolation of stormwater into the ground.
e. Minimize directly connected impervious areas by directing roof, parking lot, and surface flows to pervious/vegetated areas.

Stormwater Management Requirements

As outlined in this section, the District has elected to comply with the requirements of the NPDES General Permit for Waste Discharge Requirements for Stormwater Discharge From Small MS4s (Order No. 2013-0001-DWQ, as amended). The engineer of record is required to determine if a project is subject to the Phase II Small MS4 permit requirements. In addition, a Preliminary Water Quality Technical Report (WQTR) shall be submitted to the District for review and comment at the 50 percent Construction Document Submittal milestone, and the Final WQTR shall be submitted to the District for review and comment at the Division of the State Architect (DSA) Submittal milestone. This section further specifies that the District is responsible for the installation, verification, ongoing implementation, and maintenance of permanent post-construction stormwater management measures (also known as BMPs).

This section additionally specifies that some portions of District projects may be conducted in the City right-of-way (ROW), and that these portions of the project may be required to provide the following documents to the City: (1) City of San Diego Storm Water Requirements Applicability Checklist; (2) City of San Diego Standard Project Storm Water Quality Management Plan (SWQMP) forms; and (3) City of San Diego Priority Development Project SWQMP.

Storm Water Pollution Prevention Plan

This section of the District Design Guidelines and Standards Manual outlines specific requirements for the preparation of Water Pollution Control Plans (WPCPs) and SWPPPs for projects on District properties which are dependent on the size of the project disturbance area. For projects disturbing less than one acre, a WPCP must be developed to manage sediment, materials, waste, and other pollutants in stormwater. Projects disturbing one acre, or more, of soil are subject to the NPDES General Permit For Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order WQ 2022-0057-DWQ NPDES No. CAS000002; Construction General Permit). In addition, a SWPPP must be developed to meet Construction General Permit requirements based on the individual project's risk level. SWPPPs prepared for District projects must be:

a. Prepared by a Qualified SWPPP Developer.
b. Aligned with the District SWPPP template for the project size.

c. Tailored to site-specific conditions, including the selection of appropriate BMPs for each construction phase.
d. Submitted at DSA Submittal and finalized prior to bid.

This section additionally states that the project contractor should ensure permit coverage is feasible from a construction management perspective and fully compliant with Construction General Permit requirements. In addition, Water Pollution Control Drawings must be prepared for each phase of construction, which are generally considered to be demolition, grading, land development and utilities, streets and vertical, landscaping, and final stabilization.

In addition, during the conceptual phase, a preliminary water balance calculation must be conducted to assess the need for post-construction BMPs in accordance with the District's WQTR template for the Water Balance Calculator. Post-construction BMP types and locations must be refined during design development and construction drawing preparation to account for actual site conditions, and must be done in compliance with the Phase II MS4 permit. The selection, siting, sizing, and operation and maintenance requirements of the post-construction BMPs should be documented in a project-specific WQTR.

General Specifications

Section 2.2, of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications related to hydrology and water quality are anticipated to apply to future projects.

Landscape Standards

The Landscape Standards state that all landscaped areas should be evaluated for potential LID strategies, and that these areas may be used as vegetated swales or bioretention zones. In addition, the Landscape Standards state that stormwater from rooftops and other impervious surfaces should be directed into landscape areas where feasible, soil amendments should be incorporated to improve infiltration, water retention, and overall soil quality, and collected rainwater from cisterns or rain barrels should be used to irrigate portions of the landscape.

3.9.2.5 Local (Non-Regulatory)

City requirements related to water quality are not automatically applicable to projects implemented within District properties. However, in the absence of a District Phase II MS4 permit and as specified in the District Design Guidelines and Standards Manual, the District relies in part on the City's stormwater regulations and programs. Individual projects in City ROW may be required to provide the following documents to the City: (1) City of San Diego Storm Water Requirements Applicability Checklist; (2) City of San Diego Standard Project SWQMP forms; and (3) City of San Diego Priority Development Project SWQMP. As such, a summary of the City's Stormwater Standards is provided below. An overview of the City's Special Flood Hazard Area regulations is also provided, as the District intends to provide development that is compatible with surrounding properties in these areas and does not increase flood hazards.

City of San Diego Stormwater Standards

The Stormwater Standards are a portion of the City's Land Development Manual that provide information to project applicants on how to comply with the permanent and construction stormwater quality requirements of the City. The Stormwater Standards provide minimum requirements for construction site management, inspection, and maintenance of construction BMPs; monitoring of the weather and implementation of emergency plans as needed; and minimum performance standards, including the following: pollution prevention measures so that there would be no measurable increase of pollution (including sediment) in runoff from the site, no slope erosion, water velocity moving off-site must not be greater than pre-construction levels, and natural hydraulic features and riparian buffers preserved where possible. Although the footprint of the LID BMPs can often fit into planned landscaping features, this requires early planning to ensure that the features are located in places where they can intercept the drainage and safely store the water without adverse effects to adjacent slopes, structures, roadways, or other features. The City's current Stormwater Standards are consistent with the Regional Best Management Practices Design Manual and provide controls for development projects consistent with the City's MS4 permits.

The Stormwater Standards also address "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in stormwater runoff discharge rates and durations. Future development projects proposed within areas draining to San Diego Bay would typically be exempt from hydromodification management requirements because of the location and hardened drainage systems. Exemptions from hydromodification management requirements shall adhere to the current City's Stormwater Standards. Projects discharging into underground storm drains discharging directly to bays or the ocean are also exempt, subject to conditions listed in the City's Stormwater Standards.

San Diego Municipal Code

The Environmentally Sensitive Lands Regulations of the San Diego Municipal Code (Chapter 14, Article 3, Division 1) include development regulations and supplemental regulations for Special Flood Hazard Areas. The procedural regulations of this section related to City permits would not apply to development on District properties; however, the flood resistant design and construction provisions have historically been relied upon for District construction in Special Flood Hazard Areas. The primary design consideration is the requirement for buildings to have their lowest floor, including basements, elevated at least two feet above the base flood elevation, or, in FIRM Zone AO, elevated above the adjacent grade by at least two feet higher than the depth number specified on the FIRM, or at least four feet higher if no depth number is specified. Within FIRM Zone AO, new construction must also provide adequate drainage paths around structures on slopes to guide flood waters around and away from proposed structures.

3.9.3 Thresholds of Significance

Thresholds used to evaluate potential hydrology and water quality impacts are based on CEQA Guidelines Appendix G. A significant hydrology and water quality impact could occur if implementation of the proposed project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;

2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;

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

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

    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

    c. 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

    d. Impede or redirect flood flows;

4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; or

5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.4 Impact Analysis

3.9.4.1 Water Quality Standards

Threshold 1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact Discussion

Program-Level

Construction

Construction of projects implemented under the FMP could result in short-term impacts to water quality associated with the handling, storage, and disposal of construction materials; maintenance and operation of construction equipment; and earthmoving activities. These activities could result in the discharge of soil or construction materials and fuels due to stormwater runoff. However, all

construction-related activities associated with projects implemented under the FMP would be required to comply with the stormwater management and water pollution control requirements in the District Design Guidelines and Standards Manual, which have been developed in part to reduce the potential for adverse water quality effects associated with construction activities. See Section 3.9.2.4 above for additional details.

Projects implemented under the FMP which would disturb one acre or more would be required to prepare and submit a Notice of Intent and a SWPPP to the SWRCB demonstrating compliance with the NPDES Construction General Permit. The Construction General Permit requires that non-stormwater discharges from construction sites be eliminated or reduced to the maximum extent practicable, that a SWPPP be developed governing project construction activities, and that routine inspections of stormwater pollution prevention measures and control practices be performed, including inspections before and after storm events. The specific BMPs required of each future project would be determined during the SWPPP preparation process based on site-specific factors but would generally include measures in the categories of site inspection and maintenance, identification of potential pollutant sources, erosion control/soil stabilization, and post-construction BMPs. Future projects would be required to implement all construction BMPs outlined in the SWPPP to protect downstream water quality and ensure compliance with the Construction General Permit. Upon construction completion, the Construction General Permit permittee for each FMP project would be required to submit a Notice of Termination to the SWRCB or RWQCB to indicate that construction has been completed.

For FMP projects that would disturb less than one acre and therefore not be subject to NPDES Construction General Permit requirements, a WPCP would be required to specify the ways in which the project would manage sediment, materials, waste, and other pollutants in stormwater as specified in the District Design Guidelines and Standards Manual. With the continued implementation of the policies and regulatory requirements outlined in the District Design Guidelines and Standards Manual, which include the implementation of erosion and sediment control BMPs, the construction of FMP projects would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Operation

Implementation of the FMP would result in development changes and changes in impervious surface area, which could indirectly increase the total amount of pollutants in stormwater runoff and non-stormwater runoff traveling to on-site drainages and downstream receiving waters, some of which are identified as impaired for certain constituents as discussed in Section 3.9.1.3. In addition, landscaping and other irrigated open spaces associated with the proposed projects under the FMP, when installed, could result in water quality impacts due to uncontrolled irrigation and the use of fertilizers or herbicides. Land uses proposed under the FMP would be similar to existing land uses on campus and, therefore, would not introduce new types of pollutants.

The majority of future projects would be constructed on previously developed sites where the reconfiguration of buildings, hardscape, and landscape could alter drainage patterns but would not substantially increase the amount of pollutant discharge. The District Design Guidelines and Standards Manual requires a preliminary water balance calculation to be conducted to determine the need for post-construction BMPs based on existing and proposed site characteristics. Based on this calculation, the selection, siting, sizing, and operation and maintenance requirements of post-construction BMPs that are determined to be applicable must be documented in a project-specific WQTR. The District is

responsible for the installation, verification, ongoing implementation, and maintenance of permanent post-construction BMPs across campus.

Specific details related to new campus stormwater BMPs would be developed during required project-level design evaluations. The selected BMPs must demonstrate an ability to reduce pollutant discharges to the maximum extent practicable and comply with applicable discharge prohibitions consistent with the MS4 Phase II program (Order No. 2013-0001-DWQ) standards. To ensure site-specific BMPs are consistent with applicable standards, project-specific details are submitted to a third-party engineer for verification prior to implementation. In addition, the District Design Guidelines and Standards Manual includes the Landscape Standards, which state that all landscaped areas should be evaluated for potential LID strategies, and that these areas may be used as vegetated swales or bioretention zones. In addition, the Landscape Standards state that stormwater from rooftops and other impervious surfaces should be directed into landscape areas where feasible.

With the continued implementation of District Design Guidelines and Standards Manual policies, including the development of project-specific WQTRs to define post-construction BMPs consistent with MS4 regulatory requirements, and the implementation of LID measures for runoff reduction, water quality impacts associated with changes in stormwater runoff would be minimized. As such, operation of projects implemented under the FMP would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality.

Project-Level

Construction of the Building A Expansion project and the North Campus Athletic Fields project would result in the disturbance of over one acre of land and these projects would therefore be required to prepare and submit a Notice of Intent and a SWPPP to the SWRCB demonstrating compliance with the NPDES Construction General Permit. As the Performing Arts Center project is anticipated to disturb less than one acre, a WPCP would be required to specify the ways in which the project would manage sediment, materials, waste, and other pollutants in stormwater as specified in the District Design Guidelines and Standards Manual. In addition, Water Pollution Control Drawings would be prepared for each phase of near-term project construction. Therefore, construction of the near-term projects would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

During the conceptual phase for the near-term projects, a WQTR would be required to be developed in accordance with the District's WQTR format, which would assess the required post-construction BMPs that achieve MS4 Phase II program standards. Once operational, the near-term projects would implement these BMPs and incorporate the feasible LID strategies and landscape designs to reduce pollutants within runoff. With implementation of the construction and post-construction requirements outlined in the District Design Guidelines and Standards Manual, in addition to compliance with state and regional standards for water quality standards and waste discharge requirements, implementation of the near-term projects would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.9.4.2 Groundwater Supplies and Recharge

Threshold 2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact Discussion

Program-Level

Implementation of the FMP would result in a net increase in building areas on the City College campus, and while the majority of future projects would reconfigure existing development areas comprised of impervious surface, future projects could result in an increase in impervious surface areas across campus. As a large portion of the project site is developed with impervious surfaces under existing conditions, the reconfiguration of these areas is not anticipated to increase the amount of impervious surface area on campus in a manner that would interfere with groundwater recharge. Further, as discussed in Section 3.9.1.4, the City College campus is within the Coastal Plain of the San Diego Groundwater Basin (9-033), which is designated as a Low Priority Basin. It is also not designated as a critically overdrafted basin or adjudicated area by the DWR (DWR 2020a). The project site is not located within a local groundwater recharge area, and therefore the addition of impervious surface area on the campus would not impede groundwater recharge. As discussed in Section 3.6, *Geology and Soils*, groundwater occurs at least 50 feet below ground surface across campus. As such, no groundwater extraction is anticipated to occur as a result of FMP implementation. Thus, FMP implementation would not result in a substantial decrease in groundwater recharge or the depletion of groundwater supplies such that the FMP would impede sustainable groundwater management of the basin.

Project-Level

As the near-term projects would not involve the extraction of groundwater and would be implemented within the City College campus, which is not within a designated groundwater basin or recharge area, the near-term projects would not result in a substantial decrease in groundwater recharge or the depletion of groundwater supplies such that the sustainable groundwater management of the basin would be impeded.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.9.4.3 Drainage Patterns

Threshold 3: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; 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 impede or redirect flood flows?

Impact Discussion

Program-Level

Additional campus development could alter existing drainage patterns by changing the direction runoff is directed or creating more impervious surfaces such as pavement and buildings where none were before, as impervious surfaces do not allow the percolation of water down into soil. Rather, water is forced directly into storm drain systems or streams, where increases in erosion, siltation, and flood risks can occur. Increases in impervious surface area can also result in exceeding the existing capacity of stormwater facilities if substantial runoff is rerouted or stormwater flow or velocities are substantially increased.

During construction, projects implemented under the FMP would be required to implement the maintenance, inspection, and BMP requirements within a SWPPP or WPCP, which would ensure that construction-period activities do not result in substantial water quality effects related to erosion, siltation, and surface runoff. See Section 3.9.4.1 above for additional information.

The projects proposed under the FMP would not require mass grading or substantial changes in topography on the campus such that major drainage pattern changes would occur in off-site areas, and runoff would continue to drain towards curbs and gutters throughout campus and in adjacent streets, similar to existing conditions. As discussed in Section 3.9.4.1, projects implemented under the FMP would be required to comply with the construction and post-construction requirements outlined in the District Design Guidelines and Standards Manual, which include compliance with the Phase II Small MS4 permit standards, preparation of a SWPPP or WPCP, preparation of a WQTR in which post-construction BMPs are identified, and the integration of LID concepts into project-design to reduce runoff and increase water retention. The preparation of preliminary water balance calculations would determine whether individual projects on campus would alter runoff in a manner that requires alterations to the locations, sizes, or types of BMPs in the project vicinity, or whether new drainage features can connect to existing BMPs. New BMPs or alterations to existing BMPs required for each project would be documented in a WQTR and installed during project construction. While the types and locations of BMPs may be adjusted to accommodate future campus development, the overall quantity of runoff is not anticipated to substantially increase given that the majority of future projects would be constructed on previously developed sites where impervious surfaces occur under existing conditions. Compliance with these requirements would ensure that projects implemented under the FMP do not result in substantial erosion, siltation, runoff, or the exceedance of capacity of stormwater drainage systems as drainage changes occur.

As shown on Figure 3.9-1, the southeastern corner of campus is within the Switzer Creek 100-year floodplain, which is designated as FEMA Flood Zone AO. A small portion of this floodplain is located on the southeastern corner of the Affordable Student Housing project site, which has previously undergone environmental review under CEQA (see Section 2.4.3.4) and incorporated appropriate flood risk management features. This floodplain is additionally mapped on portions of campus that are located to the south and southwest of the Affordable Student Housing project site, where the existing Mathematics and Social Sciences building (Building MS), Career and Technology Center (Building V), and parking structures occur. While neither of these areas are proposed for specific development projects under the FMP at this time, should the District undertake additional development or redevelopment within this floodplain, such work could impede or redirect flood flows.

As the project would not result in a substantial change in the drainage patterns of the project site and would install BMPs to manage runoff where such changes would occur, the project would not result in substantial erosion, a substantial increase in the rate or amount of surface runoff such that flooding would occur, or exceedance of stormwater infrastructure capacity. However, if projects implemented under the FMP occur within the area on campus that is designated as a floodplain (refer to Figure 3.9-1), a future development project could result in flood flow alterations.

Project-Level

Each of the near-term projects proposed under the FMP would alter impervious surfaces on the City College campus. However, these projects would not require mass grading or substantial changes in topography on their respective project sites such that major off-site drainage pattern changes are anticipated. Each of these projects would be required to implement the construction and post-construction requirements outlined in the District Design Guidelines and Standards Manual and described under the program-level analysis above, including preparation of water balance calculations to determine where post-construction BMPs are needed and their appropriate sizing. LID concepts are also required to be integrated into the design of each near-term project to reduce runoff and increase water retention. Implementation of these District requirements would ensure that the near-term projects do not result in a substantial increase in erosion, siltation, or runoff, or exceed the capacity of existing stormwater drainage systems. The near-term projects would not be located within a 100-year flood zone or a 500-year flood zone, as shown on Figure 3.9-1. As the near-term projects would implement BMPs to capture, treat, and discharge runoff based on proposed changes in the drainage patterns of the redevelopment sites, they would not result in substantial erosion, a substantial increase in the rate or amount of surface runoff such that flooding would occur, exceedance of stormwater infrastructure capacity, or flood flow alterations.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP would not alter the existing drainage pattern of the area in a manner which would result in substantial erosion or siltation, flooding, exceedance of stormwater drainage system capacity, or increased polluted runoff. However, if development under the FMP is proposed within the area designated as a floodplain (refer to Figure 3.9-1), a project could result in flood flow alterations and **program-level impacts would be significant prior to mitigation**.

Project-Level

Implementation of the near-term projects would not alter the existing drainage pattern of the area in a manner which would result in substantial erosion or siltation, flooding, exceedance of stormwater drainage system capacity, increased polluted runoff, or redirection of flood flows. **Project-level impacts would be less than significant**. No mitigation is required.

Mitigation Measures

Program-Level

If development is proposed within the area designated as a Special Flood Hazard Area (refer to Figure 3.9-1), the following mitigation measure would apply.

HYD-1 Project-Specific Hydraulic Assessment for Projects within Flood Hazard Areas. If a project is proposed within an area designated as a Special Flood Hazard Area on the current FIRM published by FEMA, a project-specific Hydraulic Assessment shall be prepared. The Hydraulic Assessment shall identify the base flood elevation and design recommendations that achieve the City of San Diego requirements for construction in a Special Flood Hazard Area (San Diego Municipal Code Section 143.0146[c]), including (but not limited to) the requirement for finished floors to have at least two feet of freeboard over the 100-year base flood elevations. The design recommendations of the Hydraulic Assessment shall be incorporated into building plans submitted to and approved by the Division of the State Architect. The District shall also be required to obtain flood insurance prior to occupancy of the building or structure until or unless FEMA floodplain mapping is revised to reflect a change in the floodplain such that the project occurs outside of a Special Flood Hazard Area.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measure HYD-1 would reduce program-level floodplain drainage change impacts to a level that is **less than significant**.

3.9.4.4 Inundation

Threshold 4: Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Impact Discussion

Program-Level

Tsunamis are typically generated by seismic activity, which causes displacement of the ocean floor, resulting in large waves at the coast. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. The nearest enclosed body of water that could generate a seiche is Chollas Reservoir, located approximately five miles northeast of the project site. In the unlikely chance that a seiche occurs, it would not result in inundation of the project site. In addition, the project site is not

located within a mapped tsunami hazard area (Appendix F). As a result, tsunamis and seiches are not considered a potential hazard to future projects on the City College campus.

As described in Section 3.8, *Hazards and Hazardous Materials*, small quantities of hazardous materials may be used on campus but would be required to be stored in accordance with applicable regulations intended to prevent the accidental release of such materials. The project site is mapped primarily as an Area of Minimal Flood hazard within Zone X (FEMA 2012), though the southeastern corner of campus is within the Switzer Creek 100-year floodplain designated as Zone AO (Figure 3.9-1; FEMA 2019). As described in Section 3.9.4.3 above, there is no specific long-term project proposed under the FMP for this area at this time. However, should the District propose additional development or redevelopment within the floodplain, a future project could risk release of pollutants due to project inundation.

Project-Level

As stated under the program-level analysis above, the City College campus, including the near-term project sites, is not within a tsunami or seiche hazard zone. Although the southeastern portion of campus is within a floodplain, neither of the near-term projects would be constructed within this area (refer to Figure 3.9-1). Therefore, the near-term projects would not risk release of pollutants due to project inundation.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP would not result in the risk of release of pollutants due to inundation within a tsunami or seiche zone. However, future projects within the area designated as a floodplain (refer to Figure 3.9-1) could result in the risk of release of pollutants within a flood hazard zone and **program-level impacts would be significant prior to mitigation**.

Project-Level

Implementation of the near-term projects would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. **Project-level impacts would be less than significant**. No mitigation is required.

Mitigation Measures

Program-Level

If development is proposed within the area designated as a floodplain (refer to Figure 3.9-1), mitigation measure HYD-1, provided in Section 3.9.4.3, would apply.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measure HYD-1 would reduce impacts related to inundation in flood hazard zones to a level that is **less than significant**.

3.9.4.5 Water Quality and Groundwater Management Plans

Threshold 5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Discussion

Program-Level

The water quality control plan applicable to the project site is the San Diego Basin Plan described in Section 3.9.2.3 above, which designates beneficial uses and water quality objectives for ground and surface waters in the San Diego region. At the individual project level, compliance with RWQCB permits and objectives through the implementation of a SWPPP and implementation of identified BMPs during operation of projects implemented under the FMP would ensure that these projects do not conflict with or obstruct the implementation of the Basin Plan. In addition, the District Design Guidelines and Standards Manual includes requirements that individual projects are required to implement during construction and operation to protect water quality and apply LID techniques (refer to Section 3.9.4.1 for additional details). Adherence to these District requirements consistent with SWRCB and RWQCB permit programs would ensure that individual projects implemented under the FMP would be consistent with the objectives outlined in the Basin Plan.

As discussed in Section 3.9.1.4, the City College campus is within the Coastal Plain of the San Diego Groundwater Basin (9-033) which is a Low Priority Basin. Thus, no sustainable groundwater management plan applies to this basin and the FMP would not result in conflicts with a sustainable groundwater management plan.

Project-Level

The near-term projects implemented under the FMP would be required to implement the state, regional, and District requirements related to water quality during construction and operation as outlined under the program-level analysis above. Adherence to these requirements would ensure that the near-term projects are consistent with the objectives in the Basin Plan for water quality. In addition, as the near-term projects would be located within the City College campus, they would not be located within a designated groundwater basin with an applicable sustainable groundwater management plan. Therefore, implementation of the near-term projects would not result in conflicts with a sustainable groundwater management plan.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.9.5 Cumulative Impact Analysis

Cumulative impacts would result if modifications to a portion of a watershed or water pollution produced by development were to affect other water bodies in the watershed, as lands and water bodies within a watershed are part of an interrelated hydrologic system. The geographic scope for analysis of cumulative impacts related to hydrology and water quality is the Pueblo San Diego HU.

3.9.5.1 Water Quality Standards

Cumulative development projects would require conformance with regulatory requirements related to water quality, such as the NPDES Construction General Permit for projects disturbing one or more acres, the City's requirement for preparation of a WPCP for projects disturbing under one acre, and NPDES requirements for implementation of post-construction BMPs. Depending on the uses proposed by cumulative projects, other general permit types issued by the SWRCB or RWQCB may also apply for point source pollutants. Similar to the proposed FMP, compliance with the applicable state, regional, and local requirements would ensure that projects within the Pueblo San Diego HU do not violate water quality standards. Therefore, cumulative impacts related to water quality standards would be **less than significant**.

3.9.5.2 Groundwater Supplies and Recharge

Cumulative development projects proposed within the Pueblo San Diego HU could increase the amount of impervious surface area on their respective project sites and reduce groundwater infiltration. However, similar to the FMP, the cumulative development projects would not be located within a groundwater basin that is designated as medium or high priority and has a sustainable groundwater management plan as there are no groundwater basins within the cumulative development area (the Pueblo San Diego HU) that are designated as medium or high priority (DWR 2020a). Therefore, the increase in impervious surface area that could occur is not anticipated to substantially impede groundwater recharge as no groundwater sustainability plans would apply to the cumulative development projects. As such, cumulative impacts related to groundwater supplies and recharge would be **less than significant**.

3.9.5.3 Drainage Patterns

Cumulative development projects could potentially alter the existing drainage patterns at their respective project sites. However, similar the projects proposed under the FMP, these cumulative development projects would be required to comply with relevant permits and regulations related to stormwater runoff, erosion, siltation, and system capacity implemented by the SWRCB, RWQCB, and City. As such, cumulative impacts to related to the alteration of drainage patterns would be **less than significant**.

3.9.5.4 Inundation

Cumulative development projects could be located in flood hazard, tsunami, or seiche zones and therefore could result in a cumulative increase in the risk of release of pollutants due to inundation. However, tsunamis, seiches, and floods are localized events and cumulative projects would not increase the likelihood of their occurrence or result in increased exposure to these events. In addition, projects that are located within these inundation hazard zones would be required to comply with storage regulations and permit requirements developed for the purpose of reducing the risk of pollutant release. Therefore, cumulative impacts related to the risk of release of pollutants due to cumulative project inundation would be **less than significant**.

3.9.5.5 Water Quality and Groundwater Management Plans

Cumulative development projects would be subject to the goals and policies identified within the Basin Plan, similar to the proposed FMP. There are ten watershed WQIPs in the San Diego Region, which each

include descriptions of the highest priority pollutants or conditions in a specific watershed, goals and strategies to address those pollutants or conditions, and time schedules associated with those goals and strategies (RWQCB 2026). Of these ten WQIPs, the San Diego Bay WQIP would be applicable to the cumulative development projects located within the Pueblo San Diego HU. Similar to the FMP, cumulative development projects would be required to comply with this plan, as applicable at the project level, which generally is equivalent to adherence to the regulatory programs implemented by the SWRCB and RWQCB. As discussed under Section 3.9.5.2, there are no groundwater basins with groundwater sustainability plans that would be applicable to the cumulative development projects. Cumulative impacts related to water quality and groundwater management plans would be **less than significant**.

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3.10 Land Use and Planning

This section addresses the potential land use and planning impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to land use and planning are also addressed.

3.10.1 Environmental Setting

3.10.1.1 Project Setting and Land Uses

City College is located on approximately 44 acres of land in the northeast subdistrict of the East Village neighborhood of downtown San Diego. The City College campus is comprised of 40 buildings totaling approximately 1,344,512 gross square feet (GSF) with North Campus and South Campus separated by Park Boulevard and Russ Boulevard. San Diego High School is nestled between these two areas to the northeast. North Campus is generally comprised of indoor and outdoor recreational opportunities and School of Health and Exercise Science buildings. South Campus is generally comprised of student services and administration buildings and buildings dedicated to the School of Arts, Humanities, and Communications; the School of Business, Engineering & Technology, Information Technology, and Cosmetology; and the School of Behavioral and Social Science, Consumer and Family Studies.

The City of San Diego (City) General Plan designates the land use for the City College campus as Institutional & Public and Semi-Public Facilities (City 2024); however, the applicable land use plan for campus is the FMP. Generally, the campus is assigned the following land uses within the FMP, although in providing an integrated campus some areas may overlap:

- Academic: Academically-oriented buildings which could include classrooms or other student spaces, office and faculty/staff spaces, assembly spaces, lobbies, dining facilities, lockers, or bookstores.
- Housing: Encompasses all associated facilities for student housing, such as dining, assembly, recreation, or spaces of inhabitation.
- Parking Structure: Represents above-ground, below-grade, or a combination of structure types.
- Seeds: Outdoor planting and farm space specific to the Seeds@City sustainable agriculture program.
- Other: Represents third-party or otherwise leasable space, which are areas of opportunity for collaboration in future development.

3.10.1.2 Surrounding Setting and Land Uses

The City College campus is located in the northeast corner of downtown San Diego. Downtown encompasses approximately 1,500 acres and is bound by Interstate (I-) 5 on the north and east and San Diego Bay on the south and west. Existing land uses within the Downtown Community Plan area include streets and public rights-of-way (ROW; 714 acres), commercial and office (286 acres), residential (135 acres), vacant land (106 acres), public institutional (88 acres), open space (73 acres), mixed use (68 acres), and industrial (42 acres; City 2026). Downtown is further divided into eight distinct

neighborhoods based on existing character and expected new development types and elements such as history, building volumes, parks and open spaces, land use emphasis, design, texture, and light.

The City College campus is within the East Village neighborhood of downtown, which is a large neighborhood encompassing the eastern portions of downtown and has traditionally been less developed than the downtown neighborhoods located closer to the waterfront or the business core of downtown. East Village is defined by four different sub-districts: Ballpark, Southeast, Northwest, and Northeast, with the City College campus located within the Northeast subdistrict. The Northeast subdistrict is characterized by high-density residential development mixed with institutional uses, smaller hotels, and retail, and is defined as a gateway between downtown and Golden Hill and Balboa Park.

North Campus is bounded by I-5 on the north, Russ Boulevard on the south, Park Boulevard on the east, and State Route (SR) 163 on the west. South Campus is bounded by Russ Boulevard on the north, C Street and Broadway on the south, I-5 on the east, and Park Boulevard and 15th Street on the west. Land use designations for the areas that surround North Campus include I-5 and Existing Park/Open Space associated with Balboa Park to the north, Employment/Residential Mixed-Use to the south, Residential Emphasis to the west, and Public/Civil and Existing Park/Open Space associated with San Diego High School to the east. Land use designations for the properties that surround South Campus include Public/Civil and Existing Park/Open Space associated with San Diego High School to the north, Neighborhood Mixed-Use Center and Employment/Residential Mixed-Use to the south, Residential Emphases to the west, and I-5 to the east (City 2006).

3.10.2 Regulatory Framework

A summary of state, regional, District, and local regulations that pertain to land use and planning is provided below. No federal regulations regarding land use and planning apply to the project.

3.10.2.1 State

California Planning and Zoning Law

The legal framework in which California's cities and counties exercise local planning and land use functions is provided in the California Planning and Zoning Law (Government Code Sections 65000 through 66499.58). Under this state planning law, each city and county must adopt a comprehensive, long-term general plan. State law gives cities and counties wide latitude in how they create a general plan, but there are fundamental requirements that must be met. These requirements involve the inclusion of nine mandatory elements described in the Government Code: land use, circulation, housing, conservation, open space, noise, safety, environmental justice, and air quality. Only cities and counties that have identified disadvantaged communities must address environmental justice, including air quality, in their general plans. Additional elements may be added at the discretion of individual jurisdictions when preparing their general plan. Each of the elements sets forth objectives, principles, standards, policies, and plan proposals related to the element's topic.

However, as discussed further in relation to Assembly Bill (AB) 648 below, student, faculty, and staff housing projects are exempt from the local zoning regulations of the City. In addition, pursuant to Government Code Section 53094, local City zoning is not applicable to community college projects that enhance the District's ability to provide classroom education. As such, the FMP, rather than a city or

county general plan, provides the applicable land use guidance for development within the City College campus.

Assembly Bill 648

AB 648 added Section 81055 to the California Education Code to exempt the construction of university housing development projects, as defined in Public Resources Code (PRC) Section 21080.58, from the local zoning regulations of a city, county, or city and county when such projects are constructed on property owned or leased by a community college district. To meet the requirements of Education Code Section 81055, an off-campus housing project must be located within 0.5 mile of a main campus, or within 0.5 mile of a satellite campus that existed before July 1, 2025. For housing projects including faculty or staff units, a portion of the units must be made available at rents affordable to extremely low income and lower income faculty and staff.

Senate Bill 375

As described further in Section 3.7.2.2, Senate Bill (SB) 375 requires coordination of land use planning, regional transportation plans (RTPs), and funding priorities to reduce greenhouse gas (GHG) emissions from passenger vehicle travel within each Metropolitan Planning Organization (MPO) planning area. As it pertains to land use planning, each MPO must create a Sustainable Communities Strategy (SCS) to achieve its regional GHG emissions reduction goal through the development of more compact, complete, and efficient communities. For the project area, the San Diego Association of Government's (SANDAG's) 2025 Regional Plan achieves the requirements of SB 375.

3.10.2.2 Regional

San Diego Association of Governments Regional Plan

The SANDAG 2025 Regional Plan was adopted by the SANDAG Board of Directors on December 12, 2025, and includes the region's RTP/SCS, as required by SB 375, and Regional Comprehensive Plan (SANDAG 2025). The 2025 Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The SCS describes coordinated transportation and land use planning strategies that exceed the state's target for reducing per capita GHG emissions set by the California Air Resources Board (CARB). The 2025 Regional Plan identifies a variety of mobility projects in the vicinity of campus, including rapid bus route projects such as the Freeway Rapid Route 640 along Park Boulevard, B Street, and Russ Boulevard to I-5; Arterial Rapid Route 215, which would connect San Diego State University to downtown along Park Boulevard; and Freeway Rapid Route 290, which would connect downtown to the Rancho Bernardo Transit Station and pass by North Campus along the SR 163 northbound on-ramp. The City College campus is also in an area anticipated on the Land Use Pattern maps prepared by SANDAG to accommodate job growth in the region for 2035 and 2050 (SANDAG 2025). Housing growth is also anticipated in the area surrounding the campus for both 2035 and 2050.

Airport Land Use Compatibility Plan

The San Diego Regional Airport Authority (SDCRAA) serves as the Airport Land Use Commission (ALUC) for San Diego County (County). The SDCRAA is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for 16 public use and military airports in the County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property

within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them in the areas of noise, overflight, safety, and airspace protection, in order to minimize the public's exposure to hazards within the Airport Influence Area (AIA) for each airport.

Each AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour, the outer boundary of all safety zones, and the airspace. Review Area 1 consists of locations where noise or safety concerns may necessitate limitations on the types of land use actions, and all compatibility policies and standards in the ALUCP apply. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1, and only airspace protection and overflight policies and standards apply. The SDCRAA has no jurisdiction over the operation of airports or over existing land uses, regardless of whether or not such uses are incompatible with airport activities. Once ALUCPs have been adopted, local agencies with land located within the AIA boundary for any of the airports must, by law, amend their planning documents to conform to the applicable ALUCP. The City College campus is within the San Diego International Airport AIA, as discussed further below.

Airport Land Use Compatibility Plan for the San Diego International Airport

The San Diego International Airport is located in central San Diego between the Peninsula, Midway-Pacific Highway, and the Downtown Community Planning areas, adjacent to the San Diego Bay. The San Diego International Airport ALUCP was adopted on February 13, 2025 (SDCRAA 2025). Its purpose is to provide guidance on appropriate land uses surrounding the airport to protect the health, safety, and welfare of people and property within the vicinity, and in turn to protect the airport against encroachment by incompatible land uses which might restrict its operations. The ALUCP policies apply within the AIA for San Diego International Airport, which includes the campus. Most of the City College campus is within the 60-65 dB CNEL noise contour associated with San Diego International Airport. However, the campus' Athletics, Exercise Science, and Health Building (Building P); Fitness Center (Building P-2); tennis courts; Betty Hock softball field, and soccer field fall within the 65-70 dB CNEL noise contour. In addition, the northern portions of the Betty Hock softball field and soccer field fall within the 70-75 dB CNEL noise contour. Refer to Figure 3.8-1. In addition, although most of the City College campus is not within the airport's Safety Zone, the northernmost portions of the Betty Hock softball field and soccer field fall within Safety Zone 4E. Refer to Figure 3.8-2.

3.10.2.3 District

City College Facilities Master Plan

The FMP was approved on October 13, 2022 and provides the applicable land use guidance for development within the City College campus. The FMP describes physical improvements required to achieve the strategic goals of the Educational Plan and establishes planning assumptions for future campus development based on projected enrollment and staffing needs. See Section 2.0, *Project Description*, for additional information.

3.10.2.4 Local (Non-Regulatory)

The City has numerous policies, programs, codes, and ordinances that regulate land use development. The following sections focus on the City's plans that affect land use designations and zoning. However, pursuant to Government Code Section 53094, local City zoning is not applicable to community college

projects that enhance the District's ability to provide classroom education. As the FMP would occur adjacent to properties within the City and the District aims to provide land uses compatible with surrounding development, a summary of the City's General Plan and the Downtown Community Plan, focusing on policies relevant to the FMP, are included below.

City of San Diego General Plan

An update to the City General Plan was adopted in 2024, building off of the City of Villages strategy, which was first adopted as part of the Strategic Framework Element of the City's 2002 General Plan. The Strategic Framework Element represented the City's new approach for shaping how the City would grow while attempting to preserve the character of its communities, natural resources, and amenities. Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural, undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses. It is a development strategy that mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development in areas with available public infrastructure. The City General Plan is developed to provide a structure to guide future community plan updates and amendments, which provide localized land use plans for the City.

San Diego Downtown Community Plan

The Downtown Community Plan, adopted in April 2006, serves as a long-range blueprint for guiding growth, development, and revitalization in downtown San Diego through 2030. It emphasizes high-density, mixed-use development to support housing, employment, and transit-oriented infrastructure while preserving neighborhood character and enhancing public spaces. The plan promotes sustainability, walkability, and urban design excellence, with targeted strategies each district. It also aligns with regional goals for smart growth and includes provisions for affordable housing, mobility improvements, and environmental stewardship to accommodate a projected doubling of the downtown population.

Key policies in the Downtown Community Plan include incentives for mixed-use and vertical development through flexible zoning and increased floor area ratios, especially near transit hubs. The plan encourages affordable housing production, including family-sized units and preservation of the existing housing stock, while mandating open space in residential projects. Mobility policies prioritize walkability, shared parking, and reduced car dependency, with improved pedestrian connections and transit access. Environmental design standards promote green building practices, stormwater management, and the creation of new parks and plazas. Historic preservation is supported through adaptive reuse and development rights transfers, balancing growth with cultural integrity.

Policies within the Downtown Community Plan update that are specific to City College include the following:

Policy 4.1-P-12 Expand and develop shared use programs and agreements for existing recreation and open spaces with San Diego High School, City College, and other future school playgrounds/open space.

Policy 4.1-P-13 Unify, strengthen, and continue the Bay to Park Paseo, especially along the San Diego High School and City College edges, and develop an enhanced "Green Bridge" at the I-5 overpass.

Policy 5.1-P-4 Encourage City College and San Diego High to respect and continue street right-of-way alignments and not place buildings in those view corridors.

Policy 8.1-P-2 Coordinate with City College on new development, programming, and facilities that bolster its mission and contribute to downtown commerce, culture, and living.

Policy 8.5-P-1 Locate smaller topical libraries primarily in the Civic/Core and Columbia districts, Neighborhood Centers, near City College, and around the Central Library.

3.10.3 Thresholds of Significance

Thresholds used to evaluate potential land use and planning impacts are based on CEQA Guidelines Appendix G. A significant land use and planning impact could occur if implementation of the proposed project would:

1. Physically divide an established community; or

2. 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.

3.10.4 Impact Analysis

3.10.4.1 Community Division

Threshold 1: Would the project physically divide an established community?

Impact Discussion

Program-Level

Implementation of the FMP, including the near-term projects, would occur within the boundaries of the existing campus, other than connections to existing utilities adjacent to campus and circulation alterations at the campus entrances. Future circulation improvements across and adjacent to campus, such as pedestrian connections and bicycle paths, would improve connections to campus along existing roadways and enhance connectivity within the campus but would not impede connectivity of the surrounding community. As no major development would occur outside of the established campus boundaries, implementation of the FMP would not physically divide an established community.

Project-Level

The near-term projects would be implemented within the boundaries of the City College campus on their respective project sites. No intrusion into or division of surrounding communities would occur. The near-term projects would not physically divide an established community.

Level of Significance Prior to Mitigation

The FMP, including the near-term projects, would not physically divide an established community. **No program-level or project-level impact would occur**. No mitigation is required.

3.10.4.2 Land Use Plans, Policies, and Regulations

Threshold 2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Discussion

Pursuant to Government Code Section 53094, local City of San Diego zoning is not applicable to community college projects that enhance the District's ability to provide classroom education. As such, the FMP provides the applicable land use guidance for development within the City College campus and is further analyzed below. The FMP is the applicable campus land use plan, as the District is the only agency with local land use jurisdiction over campus projects. Nevertheless, additional land use plans which would apply to the areas adjacent to the campus have been reviewed for this analysis where relevant to campus development.

Program-Level

City College Facilities Master Plan

As discussed further in Section 2.0, *Project Description*, the FMP is the educational and facilities master plan for City College and is the applicable land use plan for the campus. The fundamental purpose of the FMP is to guide the orderly and coordinated development of the City College campus to achieve District and campus program goals. The FMP includes designs and concepts for improvements and facility projects that are conceptual and intended to serve as a framework for the future detailed design of campus improvements as funding becomes available. The FMP establishes planning assumptions for future campus development based on projected enrollment and staffing needs. In addition to the projected student growth rate, facilities planning is based on the unique space needs of the programs that are lacking space or are most likely to grow. In the FMP, areas of the City College campus are generally assigned the zoning designations of Academic, Housing, Parking Structure, Seeds, and Other.

While the FMP is the applicable land use planning document for City College, it is a programmatic planning document rather than a plan adopted for the purpose of avoiding or mitigating an environmental effect under CEQA. This PEIR provides environmental review for the FMP under CEQA and discusses potential environmental effects of the project, considering where applicable those plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Projects implemented under the FMP would be required to comply with the District Design Guidelines and Standards Manual, which provides District policies for design professionals and construction teams as well as the District Sustainability Levels framework that is designed to recognize, measure, and promote sustainable practices across District campuses and facilities. Future development projects that implement the FMP would be reviewed and approved at the appropriate level of the District and such review would involve verification of conformance with applicable regulations that protect environmental resources as well as review for consistency with the environmental analysis within this PEIR. Therefore, implementation of the FMP would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

City of San Diego General Plan and Downtown Community Plan

Although the District is not subject to local land use planning documents such as the City's General Plan or community plans, the District strives to maintain consistency with local land use plans where feasible. The General Plan aims to direct new development projects into urbanized areas where a mix of uses occur and public infrastructure is available. In addition to the specific General Plan policies addressing City College, which are further discussed below, the FMP would generally align with the principles of the General Plan by increasing density within the previously developed campus boundaries rather than expanding into undeveloped areas. The City College campus is mapped as Public/Civic and Existing Park/Open Space land uses in the Downtown Community Plan and would continue this land use with project implementation.

The Downtown Community Plan includes various policies that mention coordination with the City College, including Policy 4.1-P-12 (expand shared use programs for existing recreation and open spaces) and Policy 8.1-P-2 (coordinate with City College on new development, programming, and facilities that bolster its mission and contribute to downtown commerce, culture, and living). The District would continue to coordinate with the City as needed on various development projects and plans, including the possibility of shared-use agreements for on-campus athletic fields and open space areas. Implementation of future projects under the FMP would also contribute to the culture of the downtown area by providing enhanced educational facilities for students of City College as envisioned in these policies.

Additional policies in the Downtown Community Plan discuss locating potential projects near the City College campus, including Policy 4.1-P-13 (unify, strengthen, and continue the Bay to Park Paseo, especially along the City College edges) and Policy 8.5-P-1 (locate smaller topical libraries near City College). Development under the FMP would include enhancements of pedestrian circulation elements along Park Boulevard (the Bay to Park Paseo). Future projects would otherwise occur entirely within the boundaries of the campus, other than minor work within the City's ROW involving utility connections and landscaping, which would not impede implementation of further pedestrian enhancements or potential library projects near the campus.

In addition, the Downtown Community Plan includes Policy 5.1-P-4 (encourage City College to respect and continue street ROW alignments and not place buildings in those view corridors). Development under the FMP would occur within the boundaries of the City College campus except for minor circulation, landscaping, and utility work within City ROWs. The FMP does not propose the realignment of existing City streets. The potential closure of Russ Boulevard and would not realign other roadways or otherwise substantially alter circulation patterns in the vicinity, as the segment of Russ Boulevard east of Park Boulevard only provides access to San Diego High School and City College facilities. In addition, as discussed further in Section 3.1, *Aesthetics*, the FMP would not construct buildings within the view corridors identified within the Downtown Community Plan. Overall, the FMP would be generally consistent with the goals and policies within the City General Plan and Downtown Community Plan.

SANDAG Regional Plan

Th SANDAG Regional Plan is a long-range plan for transportation, land use, housing, and the environmental needs of the San Diego region through the year 2050. The goals of the 2025 Regional Plan include convenient and reliable movement of people and goods; equitable access to essential needs and opportunities; healthy communities and environment for everyone; and safe transportation network for all users (SANDAG 2025). The FMP would support the goals and objectives of SANDAG's

2025 Regional Plan by implementing improvements to pedestrian mobility on campus. These improvements would not impede the ability of SANDAG or other entities to implement the alternative transportation improvements identified in the 2025 Regional Plan. In addition, the FMP would increase the density of the City College campus, which is located within a Transit Priority Area (TPA) with easy access to trolley and bus services, consistent with the goals of the Regional Plan to focus growth in TPAs as a means to reduce regional vehicle miles traveled (VMT). Therefore, the FMP would be consistent with the goals of the 2025 Regional Plan.

Airport Land Use Compatibility Plans

As discussed in Section 3.10.2.2, the project site is within the AIA of the San Diego International Airport. The majority of the project site is within the 60-65 dB CNEL noise contour for the airport or outside of any noise contour. However, the Athletics, Exercise Science, and Health Building (Building P); Fitness Center (Building P-2); tennis courts; Betty Hock softball field, and soccer field fall within the 65-70 dB CNEL noise contour. In addition, the northern portions of the Betty Hock softball field and soccer field fall within the 70-75 dB CNEL noise contour. See Figure 3.8-1.

According to the San Diego International Airport ALUCP, the campus land use category "School for Adults – College, University, Vocational/Trade School" is conditionally compatible with the 60-65, 65-70, and 70-75 dB CNEL noise contours. For projects within these noise contours, buildings must be capable of attenuating exterior noise to 45 dB CNEL with windows and doors closed. For projects within the 65-70 or 70-75 dB CNEL noise contours, an avigation easement must also be dedicated to the airport owner/operator (SDCRAA 2025). The interior noise requirement of the ALUCP would be achieved through adherence to the District acoustical performance and sound transmission requirements for wall construction further detailed in the District Design Guidelines and Standards Manual. The interior noise compatibility limit of 45 dB CNEL is also less stringent than the District goal to achieve interior noise levels of 35 dB in classrooms and 40 dB in shared spaces.

Relative to airport safety, the majority of the project site is outside of the San Diego International Airport Safety Zones. Only the northern-most portions of the Betty Hock softball field and soccer field fall within Safety Zone 4E designated for the San Diego International Airport. See Figure 3.8-2. According to the ALUCP, sport facilities are compatible within Safety Zone 4E if development intensity does not exceed the maximum compatible nonresidential intensity of 240 people per acre (SDCRAA 2025). While replacement and modifications to the existing fields are proposed under the FMP, no change in the land use of this area is proposed and the development intensity would not conflict with the limits provided in the ALUCP. Therefore, future projects implemented under the FMP would be consistent with the ALUCP prepared for the San Diego International Airport.

Project-Level

The near-term projects would be implemented as part of the development proposed in the FMP, which is discussed in the program-level analysis above. In addition, the near-term projects would be developed within the boundaries of the City College campus in which the District has land use authority and would therefore not be required to demonstrate consistency with the City General Plan or Downtown Community Plan. As the near-term projects would be developed to accommodate regional growth that is accounted for in the 2025 Regional Plan, the near-term projects would be consistent with SANDAG's 2025 Regional Plan. In addition, the near-term projects would be required to comply with Federal Aviation Administration (FAA) regulations and ALUCP policies for the San Diego International Airport as outlined under the program-level analysis above. Refer to Section 3.8.4.5 for a detailed analysis of the

near-term project's consistency with the San Diego International Airport ALUCP compatibility policies as they relate to the San Diego International Airport noise contours and safety zones. Implementation of the near-term projects would not result in a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Level of Significance Prior to Mitigation

The FMP, including the near-term projects, would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.10.5 Cumulative Impact Analysis

Land uses and development patterns are typically established in local land use planning documents specific to jurisdictions but can have implications on surrounding areas. The geographic scope for the land use cumulative analysis is the City of San Diego.

3.10.5.1 Community Division

Cumulative development projects proposed within the City would likely occur within individual properties or connected groups of properties and are not anticipated to divide established communities as the City is largely developed with existing development, circulation features, and dedicated open space defining locations with the potential for further development. In addition, cumulative development projects would be evaluated for compliance with existing zoning and land use planning documents established by the City and it is anticipated that the City would require minimization efforts to prevent impacts related to community division. Therefore, cumulative impacts of the FMP, in combination with cumulative development projects, related to the physical division of an established community would be **less than significant**.

3.10.5.2 Land Use Plans, Policies, and Regulations

Cumulative development projects within the City would be evaluated for compliance with the City's General Plan, the applicable community plan, and applicable policies and regulations adopted for the purpose of avoiding or mitigating environmental effects. Projects that are not consistent with existing land use designations would require approval of a General Plan and/or Community Plan amendment and would require environmental review under CEQA. Projects that require a land use plan amendment are required to demonstrate conformance with pertinent goals, policies, and recommendations. Where significant or potentially significant environmental impacts are identified, implementation of feasible mitigation would be required to reduce or avoid significant land use impacts. Nonetheless, the environmental effects of future projects could remain significant. The project would not conflict with land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. As such, while significant cumulative impacts related to consistency with the land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect could occur due to future development within the City, the FMP contribution to such impacts **would not be cumulatively considerable**.

3.11 Noise

This section addresses the potential noise impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to noise are also addressed. This section relies on the information and analysis in the Noise Technical Report (HELIX 2026), provided as Appendix H to the PEIR.

3.11.1 Environmental Setting

3.11.1.1 Noise Descriptors and Terminology

Noise Descriptors

All noise level or sound level values presented are expressed in terms of decibels (dB), with A weighting (dBA) to approximate the hearing sensitivity of humans. Time-averaged noise levels are expressed by the symbol L_{EQ}, with a specified duration. The Community Noise Equivalent Level (CNEL) is a 24-hour average, where noise levels during the evening hours of 7:00 p.m. to 10:00 p.m. have an added 5 dBA weighting, and noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. have an added 10 dBA weighting. Sound levels expressed in CNEL are always based on dBA. These metrics are used to express noise levels for both measurement and municipal regulations, as well as for land use guidelines and enforcement of noise ordinances.

Noise Terminology

Sound, Noise and Acoustics

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is defined as loud, unexpected, or annoying sound. In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determine the sound level and characteristics of the noise perceived by the receiver. The field of acoustics deals primarily with the propagation and control of sound.

Frequency

Continuous sound can be described by frequency (pitch) and amplitude (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of Hertz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

Sound Pressure Levels and Decibels

The amplitude of pressure waves generated by a sound source determines the loudness of that source. Sound pressure amplitude is measured in micro-Pascals (µPa). One µPa is approximately one hundred billionth (0.00000000001) of normal atmospheric pressure. Sound pressure amplitudes for different kinds of noise environments can range from less than 100 to 100,000,000 µPa. Because of this wide range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to

describe sound pressure level (SPL) in terms of dBA. The threshold of hearing for the human ear is about 0 dBA, which corresponds to 20 µPa.

Addition of Decibels

Because decibels are logarithmic units, SPL cannot be added or subtracted through standard arithmetic. Under the decibel scale, a doubling of sound energy corresponds to a 3 dBA increase. In other words, when two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dBA higher than from one source under the same conditions. For example, if one automobile produces an SPL of 70 dBA when it passes an observer, two cars passing simultaneously would not produce 140 dBA – rather, they would combine to produce 73 dBA. Under the decibel scale, three sources of equal loudness together produce a sound level 5 dBA louder than one source.

Under controlled conditions in an acoustical laboratory, the trained, healthy human ear can discern 1 dBA changes in sound levels when exposed to steady, single-frequency ("pure-tone") signals in the mid-frequency (1,000 Hz to 8,000 Hz) range. In typical noisy environments, changes in noise of 1 to 2 dBA are generally not perceptible. It is widely accepted, however, that people begin to detect sound level increases of 3 dBA in typical noisy environments. Further, a 5 dBA increase is generally perceived as a distinctly noticeable increase, and a 10 dBA increase is generally perceived as a doubling of loudness.

No known studies have directly correlated the ability of a healthy human ear to discern specific levels of change in traffic noise over a 24-hour period. Many ordinances, however, specify a change of 3 CNEL as the significant impact threshold. This is based on the concept of a doubling in noise energy resulting in a 3 dBA change in noise, which is the amount of change in noise necessary for the increase to be perceptible to the average healthy human ear.

3.11.1.2 Ground-borne Vibration Descriptors and Terminology

Ground-borne vibration consists of rapidly fluctuating motions or waves transmitted through the ground with an average motion of zero. The rumbling sound caused by the vibration of room surfaces due to ground-borne vibration is called ground-borne noise. Ground-borne noise is highly dependent on the characteristics of the structure subject to vibration. Therefore, this analysis focuses on ground-borne vibrations. Sources of ground-borne vibrations include natural phenomena and anthropogenic causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Peak particle velocity (PPV) is defined as the maximum instantaneous positive or negative peak of the vibration wave. Decibels are also used to compress the range of numbers required to describe vibration. A vibration velocity level (L_V) with units of VdB (referenced to one-micro-inch per second velocity) is commonly used in evaluating human reactions to vibrations as it describes the "smoothed" vibration amplitude. For the purposes of this analysis, L_V with units of VdB is used to evaluate construction-generated vibration for building damage and human reactions.

3.11.1.3 Noise and Vibration Sensitive Land Uses

Noise-sensitive land uses (NSLUs) are land uses that may be subject to stress and/or interference from excessive noise, such as residential dwellings, schools, transient lodging (hotels), hospitals, educational facilities, and libraries. Industrial and commercial land uses are generally not considered sensitive to

noise. Noise receptors are individual locations that may be affected by noise. The closest existing off-site NSLUs to the campus include single and multi-family residences to the south of C Street and Broadway, the multi-family residences to the southwest of the intersection of Park Boulevard and Russ Boulevard, and the hotel to the west of Park Boulevard. On-campus NSLUs include the Affordable Student Housing building located in the southeastern corner of campus, classroom buildings throughout campus, the Early Education Center, and the City College library located in the southwest corner of campus. In addition, the FMP would include the construction of additional classroom facilities which would be considered NSLUs.

Land uses in which ground-borne vibration could potentially interfere with operations or equipment, such as research, hospitals, and university research operations (California Department of Transportation [Caltrans] 2020), are considered "vibration-sensitive." The degree of sensitivity depends on the specific equipment that would be affected by the ground-borne vibration. In addition, excessive levels of ground-borne vibration of either a regular or an intermittent nature can result in annoyance to residential uses, schools, or transient lodging. Land uses in the vicinity of campus that are subject to annoyance from vibration include the on and off-campus residences described above. In addition, on-campus vibration sensitive land uses include the existing science and health classroom buildings, which contain vibration-sensitive laboratory equipment.

3.11.1.4 Existing Noise Environment

The existing noise environment on campus is dominated by traffic noise from adjacent City streets, noise from recreation uses on campus such as athletic fields, and typical college campus noise (e.g., landscape maintenance equipment, students and faculty speaking, etc.). There is also noise from aircraft overflights in the project area associated with the San Diego International Airport, which is located approximately 1.2 miles northwest of the campus. The campus is within the noise contours associated with San Diego International Airport (San Diego County Regional Airport Authority [SDCRAA] 2025). Refer to Figure 3.8-1.

Noise Survey

Five short-term (15-minute) noise measurements were taken on or near the campus to document ambient noise conditions in the vicinity. Traffic counts were taken during measurements along roadways (measurements 2 and 4) for passenger cars, medium trucks, buses, and heavy trucks that passed by the noise meter during the measurement. The measured noise levels and traffic counts, as applicable, are shown in Table 3.11-1, *Noise Measurement Results.* Measurement locations are shown on Figure 3.11-1, *Noise Measurement Locations*. Overall, noise levels recorded on campus ranged from 44.6 to 68.4 dBA L_{EQ}.

Table 3.11-1
NOISE MEASUREMENT RESULTS

Measurement 1	
Date:	October 1, 2025
Time:	10:30 a.m. – 10:45 a.m.
Location:	Intersection of B Street and 17th Street approximately 315 feet west of the centerline of I-5.
Measured Noise Level:	68.4 dBA L_{EQ}
Primary Noise Sources:	Primarily traffic noise from I-5 with occasional large aircraft overflight noise.

Measurement 2	
Date:	October 1, 2025
Time:	10:53 a.m. – 11:08 a.m.
Location:	South of the Saville Theatre approximately 50 feet north of the centerline of C Street.
Measured Noise Level:	62.1 dBA L_{EQ}
Primary Noise Sources:	Primarily traffic noise along C Street.
Traffic Count:	95 cars, 0 medium trucks, 0 buses, 0 heavy trucks.
Measurement 3	
Date:	October 1, 2025
Time:	11:19 a.m. – 11:34 a.m.
Location:	In Curran Plaza located above B Street, 60 feet south of Building L.
Measured Noise Level:	44.6 dBA L_{EQ}
Primary Noise Sources:	Very minimal perceptible noise, some distant noise from students speaking.
Measurement 4	
Date:	October 1, 2025
Time:	11:42 a.m. – 11:57 a.m.
Location:	Approximately 60 feet southeast of the intersection of Park Boulevard and Russ Boulevard.
Measured Noise Level:	66.3 dBA L_{EQ}
Primary Noise Sources:	Primarily traffic noise associated with Park Boulevard.
Traffic Count:	112 cars; 4 medium trucks, 5 buses, 0 heavy trucks.
Measurement 5	
Date:	October 1, 2025
Time:	12:37 p.m. – 12:52 p.m.
Location:	In athletic field parking area approximately 185 feet northwest of the centerline of Park Boulevard.
Measured Noise Level:	63.5 dBA L_{EQ}
Primary Noise Sources:	Almost directly under the flight path for San Diego International Airport and dominated by overhead flight noise, some noise from I-5.

dBA = A-weighted decibel; L_{EQ} = time-averaged noise level

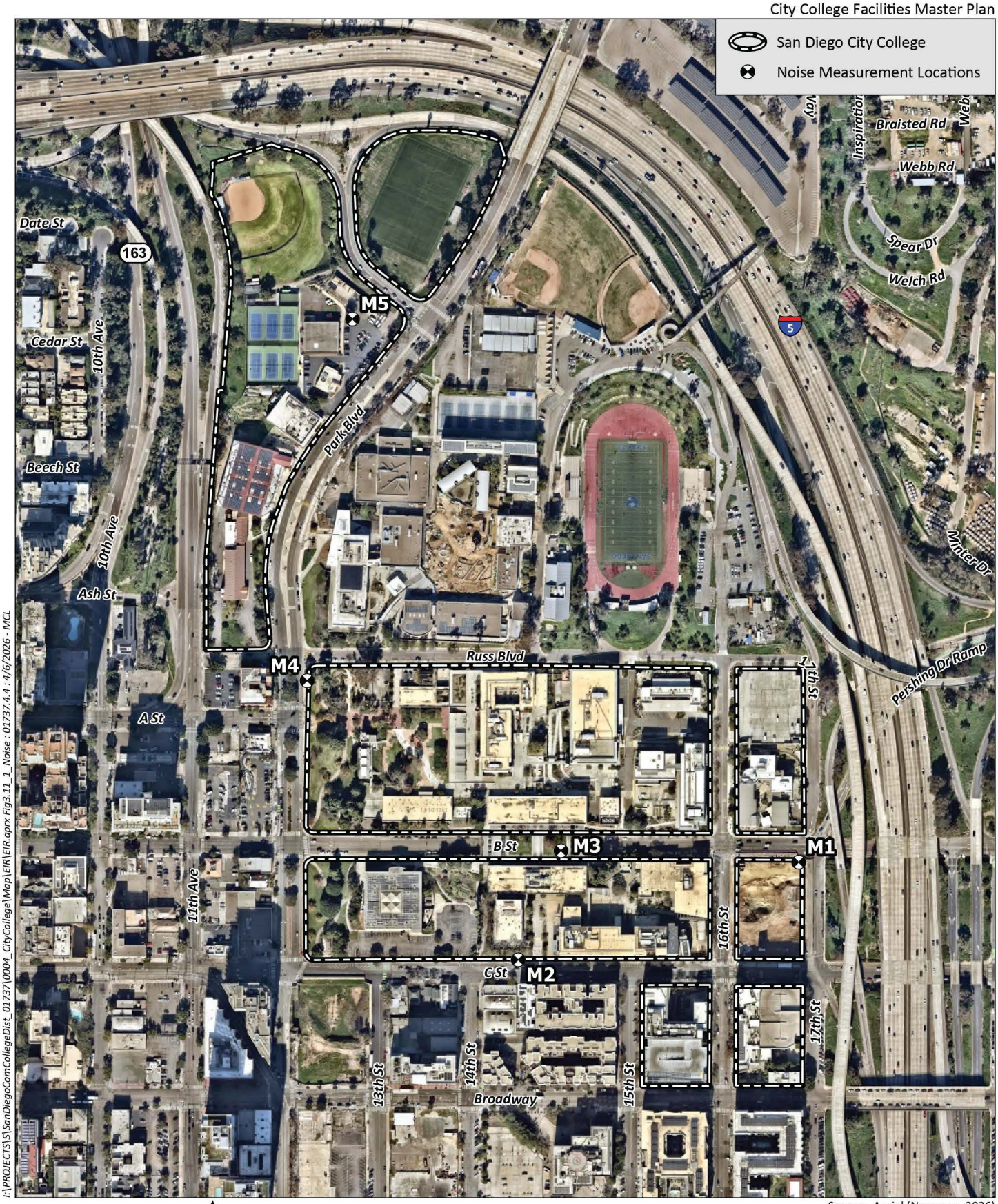
3.11.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to noise is provided below.

3.11.2.1 Federal

Federal Transit Administration

Multiple federal agencies have developed noise standards that apply to projects taken out by the applicable agency. While none of these federal noise laws, regulations, or policies for noise and vibration apply to the campus, aspects of the Federal Transit Administration (FTA) noise impact analysis framework have been used for guidance in the analysis of the project's potential impacts. The FTA's Transit Noise and Vibration Impact Assessment Manual (FTA 2018) provides technical guidance and standards for construction and operational sources of noise and vibration, including for specific vibration-sensitive land uses such as historic structures and laboratory settings. Specific impact assessment procedures and thresholds from the Transit Noise and Vibration Impact Assessment Manual are described further below where they are used in this analysis.



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0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Noise Measurement Locations

Figure 3.11-1

3.11.2.2 State

California Noise Control Act

The California Noise Control Act is a section within the California Health and Safety Code that describes excessive noise as a serious hazard to the public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the state to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

California Building Standards Code

The California Building Standards Code (California Code of Regulations [CCR] Title 24) includes interior noise standards for residential and non-residential buildings. Title 24, Part 2, the California Building Code (CBC), establishes standards for interior room noise (attributable to outside noise sources) in residential buildings. No additional residential projects are proposed in the FMP, though it is noted that the typical interior noise standard for residential buildings is 45 dB in any habitable room, which may be measured as either the Day Night sound level or CNEL, consistent with the noise element of the local general plan.

Non-residential building noise exposure is regulated in CCR Title 24, Part 11, commonly known as CALGreen, which provides the option to follow a prescriptive approach to noise attenuation or achieve performance-based interior noise criteria. The acoustical control section of CALGreen anticipated to be applicable to future campus projects is provided in detail below.

CALGreen Section 5.507.4, Acoustical Control

Non-residential buildings are required to incorporate acoustical design measures that limit interior noise from exterior sources. To comply, building assemblies must meet specified Sound Transmission Class (STC) or Outdoor-Indoor Sound Transmission Class (OITC) ratings which are verified using American Society for Testing and Materials (ASTM) testing standards. Designers may follow either a prescriptive method by using minimum STC/OITC ratings for walls, windows, and building envelopes, or a performance method that demonstrates interior noise would not exceed 50 dBA L_{EQ}. When following the prescriptive approach, wall and roof-ceiling assemblies exposed to the noise source shall have a composite STC rating of at least 50 or a composite OITC rating of at least 40, with exterior windows of a minimum STC of 40 or OITC of 30 within the 65 CNEL noise contour of an airport, freeway, railroad, industrial, or other fixed-guideway source. Where noise contours are not readily available, buildings exposed to a noise level of 65 dBA L_{EQ} during any hour of operation shall have building, building addition, or alteration exterior wall and roof-ceiling assemblies exposed to the noise source meeting a composite STC rating of at least 45 (or OITC 35), with exterior windows of a minimum STC of 40 (or OITC 30). The performance method alternatively allows an acoustical analysis to document a combination of wall or window composition requirements and exterior site features to demonstrate that interior noise attributable to exterior sources would not exceed 50 dBA L_{EQ} in occupied areas during the facility's hours of operation.

The rule applies primarily to buildings located in high-noise environments (e.g., near airports, freeways, rail lines). Exceptions to this requirement include buildings with few or no occupants or where occupants are not likely to be affected by exterior noise, as determined by the enforcement authority,

such as factories, stadiums, storage, enclosed parking structures, and utility buildings. The Division of the State Architect also specifies that for public schools and community colleges, this section applies only to new construction.

Assembly Bill 1307

Assembly Bill 1307 was approved by Governor Newsom on September 7, 2023, and added Section 21085 to the Public Resources Code (PRC) relating to environmental quality. PRC Section 21085 states that, for residential projects, the effect of noise generated by project occupants and their guests on human beings is not a significant effect on the environment under CEQA.

3.11.2.3 Regional

Airport Land Use Compatibility Plans

The SDCRAA, which acts as the Airport Land Use Commission for the County, maintains the Airport Land Use Compatibility Plans (ALUCPs) for the County's airports. The ALUCPs contain policies to regulate land use and development near airports, including noise compatibility considerations. Consideration of airport compatibility related to noise is intended to result in new development that is compatible with aircraft noise. Specifically, each ALUCP provides guidance to local agencies to limit new noise-sensitive development within the noise compatibility boundary, identifies sound attenuation goals for noise-sensitive development, and considers if avigation easements are necessary. The campus is within the Airport Influence Area (AIA) for the San Diego International Airport (SDCRAA 2025). Table 2-1 of the San Diego International Airport ALUCP defines noise compatibility standards for each land use category within the San Diego International Airport noise contours. The portions of ALUCP Table 2-1 applicable to existing or proposed land use types within the City College campus are provided in Table 3.11-2, *Airport Noise Compatibility Standards*.

Table 3.11-2
AIRPORT NOISE COMPATIBILITY STANDARDS

Land Use Category[1]	Noise Contour Range (CNEL)			
	60-65	65-70	70-75	75+
Residential				
Single or Multiple Unit	45	45[2]	45[2,3]	45[2,3]
Group Quarters	45	45[2]	45[2,3]	45[2,3]
Commercial, Office, Service, Transient Lodging				
Office – Medical, Financial, Professional Services, Civic			50	50
Service – High Intensity (e.g., Eating/Drinking Establishment, Funeral Chapel)			50	50
Sport/Fitness Facility			50	50
Theater – Movie, Live Performance, Dinner		45	45	45
Educational, Institutional, Public Services				
Cultural Facility (e.g., Library, Museum, Gallery, Planetarium, Aquarium)		45	45	45
School for Adults – College, University, Vocational/Trade School	45	45[2]	45[2]	
School for Children – Kindergarten through Grade 12 (includes charter schools)	45			

Land Use Category[1]	Noise Contour Range (CNEL)			
	60-65	65-70	70-75	75+
Transportation, Communication, Utilities				
Auto Parking				
Recreation, Park, Open Space				
Entertainment Facility – Outdoor				
Park, Open Space			[4]	[4]
Recreation Facility – Outdoor			[4]	[4]
Agriculture				
Agriculture, Horticulture, Floriculture, Forestry				

	Compatible: Use is compatible with indicated noise level.
	Conditionally Compatible: Use is compatible subject to stated conditions.
	Incompatible: Use is not compatible under any circumstances. See ALCUP Section 1.3 for policy regarding existing uses that are incompatible with these standards.
45, 50	Indoor uses: Building must be capable of attenuating exterior noise to the indicated noise level (45 or 50 dB CNEL) with windows and doors closed.

Source: SDCRAA 2025

[1] Refer to Appendix A of the San Diego International Airport ALUCP for definitions of land uses in this table. Land uses not specifically listed must comply with standards for the most similar land use, in accordance with Policy N.6.

[2] Avigation easement must be dedicated to the Airport owner/operator.

[3] New residential use is compatible above the 70 dB CNEL contour only if the current local agency land use plan designation allows for residential use. Land use plan amendments from a nonresidential designation to a designation allowing residential use are not compatible. See Policy N.4.

[4] Exterior noise in office areas and indoor meeting rooms must be attenuated to 50 dB CNEL indoors

CNEL = Community Noise Equivalent Level; dB = decibel

3.11.2.4 District

District Design Guidelines and Standards Manual

The District Design Guidelines and Standards Manual requirements related to noise and vibration are outlined below.

Sustainability Goals

Indoor/Outdoor Environmental Quality Goal 2: Improve indoor air quality and acoustics. **Key Performance Indicator (KPI):** Maintain indoor noise levels below 35 dB in classrooms and below 40 dB in shared spaces.

Sustainability Levels

The Sustainability Levels framework does not include required measures related to noise; however, it does include certain noise-related incentives within its point system. Relative to noise, a project is awarded three points if it complies with American National Standards Institute S12.60-2010 acoustical performance standards, thereby ensuring noise reduction, optimal speech intelligibility, and sound insulation in classrooms, offices, and shared spaces.

Design Guides and Standards

The District Design Guidelines and Standards Manual includes noise and vibration control criteria for all District projects in Section 2.1.3, noting that noise and vibration control is the combined responsibility of

all design professionals and consultants and must be considered in the design of every building or space. Generally, noise control is required to be provided to ensure usefulness of the facility for the purposes for which the facility is designed whether that be studying, working, or socializing. Noise-producing equipment required for building operations should be designed to be located as far as possible from noise-sensitive areas such as classrooms. For specific guidance, the criteria note that noise control should be consistent with Occupational Safety and Health Administration requirements.

For rooms requiring acoustic control, additional criteria are provided to address specific finishes and design considerations such as caulking of plumbing features, installation of light fixtures, separation of doors and restrooms from these spaces, locations of operable windows, and door gaps. Where noise control is critical to the anticipated use, a post-construction sound test may also be required.

Vibration control is also required to be considered for proposed equipment that may have effects on vibration-sensitive equipment, such as projectors, as well as the building.

General Specifications

General specifications and product and material data are provided in Section 2.2 of the District Design Guidelines and Standards Manual. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following general specifications relate to noise or vibration.

Building Demolition

4. Environmental Compliance: Ensure compliance with local, state, and federal environmental regulations regarding dust control, noise, and vibration.

Selective Demolition

3. Dust and Noise Mitigation: Implement measures such as dust barriers, negative air pressure systems, and noise-dampening method.

Gypsum Board Design Requirements

1. Acoustical Performance & Sound Transmission
    a. Sound Transmission Classification must be evaluated for each space to enhance speech privacy and noise control.
2. Requirements

Table 3.11-3
GYPSUM BOARD DESIGN REQUIREMENTS

Use	Sound Transmission Class (STC)	Maximum Noise Transmitted (decibels)
Private Offices	45-50	25-30
Conference Rooms	50-55	20-25
Classrooms	45-50	25-30
Laboratories	50-55	20-25
Mechanical/Electrical Rooms Adjacent to Occupied Spaces	55+	15-20
Corridors Adjacent to Offices/Classrooms	40-45	30-35

Source: District 2025

Air Distribution Systems

Goals and Objectives

1. Air Supply System Requirements:
    a. Ensure the supply air to conditioned spaces is:
        iv. Delivered draft-free, maintaining a noise level below NC 35, per ASHRAE [American Society of Heating, Refrigerating and Air-Conditioning Engineers] guidelines.

System Acoustical Features

1. Noise Control Guidelines:
    a. Follow ASHRAE HVAC Applications Handbook, Chapter on Sound and Vibration Control, referencing "Design Guidelines for HVAC Noise in Occupied Spaces."
2. Equipment Placement Considerations:
    a. Locate noise-generating equipment such as compressors, fan coil units, exhaust fans, and pumps outside occupied spaces.
3. Duct Noise Control Measures:
    a. Utilize turning vanes, low-velocity duct design, and sound attenuation baffles/materials to minimize noise transmission.
4. Vibration Isolation:
    a. Ensure vibration-isolating connections between air handlers, ducts, and supporting structures are adequately installed.

3.11.2.5 Local (Non-Regulatory)

While City of San Diego (City) regulations related to noise are not applicable to FMP development, local regulations provide relevant noise and vibration guidance used in this analysis where the District does not have established standards. These City regulations related to noise are summarized below.

City of San Diego General Plan, Noise Element

The Noise Element of the City's General Plan establishes noise compatibility guidelines for appropriate exterior noise levels at new land uses affected by traffic noise, as shown in Table 3.11-4, *City of San Diego Land Use Noise Compatibility Guidelines* (City 2024).

Table 3.11-4
CITY OF SAN DIEGO LAND USE NOISE COMPATIBILITY GUIDELINES

Land Use Category	Exterior Noise Exposure (CNEL)				
	<60	60-65	65-70	70-75	75+
Parks and Recreational					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
Agricultural					
Crop Raising & Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries & Greenhouses; Animal Raising, Maintain & Keeping; Commercial Stables					

Land Use Category	Exterior Noise Exposure (CNEL)				
	<60	60-65	65-70	70-75	75+
Residential					
Single Dwelling Units; Mobile Homes		45			
Multiple Dwelling Units		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities		45			
Other Educational Facilities including Vocational/Trade Schools and Colleges, and Universities		45	45		
Cemeteries					
Retail Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries, Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
Commercial Services					
Building Services; Business Support; Eating & Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly & Entertainment (includes public and religious assembly); Radio & Television Studios; Golf Course Support			50	50	
Visitor Accommodations		45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional & Corporate Headquarters			50	50	
Vehicle and Vehicular Equipment Sales and Services Use					
Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					50
Wholesale, Distribution, Storage Use Category					
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse; Wholesale Distribution					50
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation Terminals; Mining & Extractive Industries					50
Research & Development				50	50

	Compatible	Indoor Uses	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.
		Outdoor Uses	Activities associated with the land use may be carried out.
45, 50	Conditionally Compatible	Indoor Uses	Building structure must attenuate exterior noise to the indoor noise level indicated by the number (45 or 50) for occupied areas, including residential habitable areas, commercial work/shopping areas, and office areas associated with industrial uses.
		Outdoor Uses	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.
	Incompatible	Indoor Uses	New construction should not be undertaken.
		Outdoor Uses	Severe noise interference makes outdoor activities unacceptable.

Source: City 2024
CNEL = Community Noise Equivalent Level

City of San Diego Municipal Code

Section 59.5.0401, Sound Level Limits

San Diego Municipal Code Section 59.5.0401, as follows, establishes exterior sound level limits for the City that apply to operational noise sources. The permissible sound level is determined by the land use of the affected property, as provided in Table 3.11-5, *City of San Diego Exterior Noise Limits*.

(a) It shall be unlawful for any person to cause noise by any means to the extent that the one-hour average sound level exceeds the applicable limit given in the following table [Table 3.11-5], at any location in the City on or beyond the boundaries of the property on which the noise is produced. The noise subject to these limits is that part of the total noise at the specified location that is due solely to the action of said person.

Table 3.11-5
CITY OF SAN DIEGO EXTERIOR NOISE LIMITS

Land Use Zone	Time of Day	One-hour Average Sound Level (dBA)
Single Family Residential	7:00 a.m. to 7:00 p.m.	50
	7:00 p.m. to 10:00 p.m.	45
	10:00 p.m. to 7:00 a.m.	40
Multi-Family Residential (up to a maximum density of 1/2000)	7:00 a.m. to 7:00 p.m.	55
	7:00 p.m. to 10:00 p.m.	50
	10:00 p.m. to 7:00 a.m.	45
All other Residential	7:00 a.m. to 7:00 p.m.	60
	7:00 p.m. to 10:00 p.m.	55
	10:00 p.m. to 7:00 a.m.	50
Commercial	7:00 a.m. to 7:00 p.m.	65
	7:00 p.m. to 10:00 p.m.	60
	10:00 p.m. to 7:00 a.m.	60
Industrial or Agricultural	Anytime	75

Source: City of San Diego Municipal Code, Section 59.5.0401
dBA = A-weighted decibel

(b) The sound level limit at a location on a boundary between two zoning districts is the arithmetic mean of the respective limits for the two districts. Permissible construction noise level limits shall be governed by Section 59.5.0404 of this article.

Section 59.5.0404, Construction Noise

San Diego Municipal Code Section 59.5.0404, as follows, establishes sound level limits for construction noise within the City. Generally, the City permits construction between 7:00 a.m. to 7:00 p.m. Mondays through Saturdays with an average sound level of no greater than 75 dBA at the property line of a residentially zoned property during the 12-hour period.

(a) It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect,

construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administrator. In granting such permit, the Administrator shall consider whether the construction noise in the vicinity of the proposed work site would be less objectionable at night than during the daytime because of different population densities or different neighboring activities; whether obstruction and interference with traffic particularly on streets of major importance, would be less objectionable at night than during the daytime; whether the type of work to be performed emits noises at such a low level as to not cause significant disturbances in the vicinity of the work site; the character and nature of the neighborhood of the proposed work site; whether great economic hardship would occur if the work were spread over a longer time; whether proposed night work is in the general public interest; and he shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise levels as he deems to be required in the public interest.

(b) Except as provided in subsection (c) hereof, it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 dBA during the 12-hour period from 7:00 a.m. to 7:00 p.m.

(c) The provisions of subsection (b) of this section shall not apply to construction equipment used in connection with emergency work, provided the Administrator is notified within 48 hours after commencement of work.

3.11.3 Thresholds of Significance

Thresholds used to evaluate potential noise impacts are based on CEQA Guidelines Appendix G. A significant noise impact could occur if implementation of the proposed project would:

1. Generate 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;

2. Generate excessive ground-borne vibration or ground-borne noise levels; or

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

The CEQA Guidelines do not provide quantitative thresholds for the evaluation of noise and vibration impacts. The District noise standards primarily address interior building noise through building design measures for campus land uses (refer to Section 3.11.2.4). Therefore, where quantitative noise or vibration limits for other source or receptor types have not been established by the District, standards established by the City and other public agencies are considered as thresholds for the purposes of this analysis, where appropriate. While City regulations do not apply to campus development projects, many City standards are considered relevant guidance to establish thresholds for this analysis of potential impacts on surrounding land uses, which are located within City limits and subject to City noise standards.

3.11.3.1 Threshold 1: Increase in Ambient Noise Levels

Construction impacts would be considered significant if noise generated during construction activities exceeds 75 dBA L_{EQ} (12-hour) at a noise-sensitive campus land use or at the property line of a residentially zoned off-site property.

Stationary source operational impacts at off-site locations would be considered significant if the sound level limits established by the City would be exceeded for the associated land use type (refer to Table 3.11-5). This analysis conservatively considers the more restrictive sound level limit at adjacent land uses and does not use the arithmetic mean between the applicable limit and the commercial limit that would apply to campus as allowed by San Diego Municipal Code Section 59.5.0401(b).

For on-campus uses, stationary source noise impacts could occur if new noise sources would cause the interior noise standard of 50 dBA L_{EQ} established in CALGreen for academic uses or 45 dBA L_{EQ} established in the CBC for residential uses to be exceeded. It is also noted that the District's future interior noise goal is to reduce interior noise levels below 35 dB in classrooms and below 40 dB in shared spaces. To determine whether a new stationary source of noise has the potential to conflict with the interior noise level standards, exterior noise levels must be calculated. Standard building materials can be assumed to provide at least 15 dB of attenuation from exterior noise levels. Therefore, this analysis considers an exterior noise limit of 65 dBA L_{EQ} for academic buildings and 60 dBA L_{EQ} for residential buildings. If these exterior noise limits are achieved, it can be assumed that the interior noise standards are also achieved with standard building materials. The District goal to achieve noise levels below 35 dB in classrooms and below 40 dB in shared spaces could be achieved with further enhanced building materials but is not used as a threshold of significance for this analysis.

Traffic noise impacts would be considered significant if traffic generated by the project causes the traffic noise level at off-site land uses to increase above the conditionally compatible noise level defined in the City's General Plan Noise Element for that land use (refer to Table 3.11-4). If this noise level is exceeded without the addition of project-related trips, the impact would be considered significant if the project-related increase exceeds 3 dBA CNEL (a perceptible increase).

3.11.3.2 Threshold 2: Ground-borne Vibration

With respect to human annoyance, FTA guidance sets a threshold of 80 VdB for infrequent vibration events at residential land uses and other buildings where people normally sleep (FTA 2018). This standard would apply to on- and off-campus housing. Classrooms, libraries and related learning spaces, and child development centers would be considered "institutional land uses" per FTA guidance as they primarily contain daytime and evening uses; therefore, an annoyance threshold of 83 VdB would apply (FTA 2018). As these annoyance thresholds are more stringent than the building damage thresholds that would apply to on- and off-campus buildings (90 to 102 VdB depending on construction materials), the vibration analysis below focuses on these annoyance thresholds for occupied buildings and discusses building damage only for buildings extremely susceptible to building damage (FTA Type IV; 90 VdB threshold).

An additional category of vibration effects relates to the potential for disruption of laboratory research, medical procedures, or other commercial processes that are sensitive to vibration. The FTA establishes thresholds for disruption of vibration-sensitive operations based on the type of equipment that would be affected. While these thresholds provide guidance for a variety of equipment types, specific vibration

criteria provided by a manufacturer may supersede the criteria in this section if available during subsequent environmental review. The space usage type that would apply to most vibration-sensitive uses at City College would be Computer Equipment (adequate for computer equipment and low-power optical microscopes), for which the FTA establishes a maximum vibration level of 78 VdB (FTA 2018). For the Science building (Building S), vibration effects are evaluated in comparison with the vibration criterion category of VC-A (adequate for medium- to high-power optical microscopes [400X], microbalances, optical balances, and similar specialized equipment), which has a maximum vibration level of 66 VdB, though equipment-specific information may be used to update this threshold during subsequent environmental review.

3.11.4 Impact Analysis

3.11.4.1 Increase in Ambient Noise Levels

Threshold 1: Would the project generate 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?

Impact Discussion

Program-Level

Temporary Sources

Construction

Construction of individual projects under the FMP would require the use of heavy off-road equipment for demolition, site clearing, grading, installation of underground utilities/infrastructure, construction of new buildings, and paving. Typical heavy-duty construction equipment would be used; however, no excessively noisy activities such as pile driving or blasting would be required. Although piles may be required to support some project components, the District or their contractor would utilize pre-drilling as an alternative to pile driving given the proximity of sensitive receptors. Construction would generate elevated noise levels that may disrupt NSLUs in the area. Potential effects of construction noise on sensitive animal species are addressed in the impact analysis and mitigation framework of Section 3.3, *Biological Resources*; the following focuses on the effects of construction noise on human receptors.

The magnitude of the noise experienced at sensitive receptor locations would depend on the type of construction activity, equipment in use, duration of each construction phase, distance between the noise source and receiver, and any intervening structures or topography. As described in Section 3.11.3 above, the closest existing off-site NSLUs to the project site include the single and multi-family residences to the south of the project site across C Street. These residences were measured approximately 100 feet south of the center of the nearest FMP project site (the Performing Arts Center). Existing on-campus NSLUs that could be affected by construction noise include the Affordable Student Housing building, classroom buildings throughout campus, the Early Education Center, and the City College library located in the southwest corner of campus. In addition, the FMP would include the construction of additional classroom facilities which would also be considered NSLUs once operational.

Heavy off-road construction equipment would not all operate at the same time or in the same location and would not be in constant use during a typical 8-hour operating day. Further, not all pieces of

equipment would be used near off-site residential property lines. While multiple construction projects could occur within campus at one time, the movement of equipment within each site and the distance between areas where heavy-duty equipment is operating simultaneously are anticipated to provide attenuation such that combined noise levels at an individual receptor would not be substantially higher than those estimated at 100 feet. The pieces of construction equipment assumed to be used for construction were based on the default off-road equipment list in the California Emissions Estimator Model, Version 2022.1 (California Air Pollution Control Officers Association 2022). Construction equipment noise was evaluated using methodology from the FTA's *Transit Noise and Vibration Impact Assessment Manual*, Option A for a quantitative construction noise assessment. Using this methodology, equipment is assumed to operate at the center of a project site, and the two noisiest pieces of construction equipment are assumed to operate concurrently in close proximity to each other (FTA 2018). This methodology was used to calculate construction noise levels during each phase of construction at 100 feet. In addition, the distance at which the operation of the combined construction equipment would reach 75 dBA L_{EQ} (12-hour) assuming a standard 8-hour workday was calculated. The results of the hourly average construction equipment noise level calculations and distances at which noise levels for each phase would reach 75 dBA L_{EQ} (12-hour) are shown in Table 3.11-6, *Construction Equipment Average Noise Levels*.

Table 3.11-6
CONSTRUCTION EQUIPMENT AVERAGE NOISE LEVELS

Construction Phase	Two Noisiest Off-Road Equipment	dBA L_{EQ} (12-hour) at 100 feet	Distance to 75 dBA L_{EQ} (12-hour) (feet)
Demolition	Dozer, Saw	77.7	137
Site Preparation	Dozer, Backhoe	78.4	148
Grading	Grader, Dozer	80.2	183
Building Construction	Generator Set, Crane	77.8	138
Underground Utilities	Dozer, Excavator	78.4	148
Paving	Paver, Roller	80.2	183
Architectural Coating	Air Compressors (2)	72.2	73

Source: HELIX 2026
dBA = A-weighted decibel; L_{EQ} = time-averaged noise level

As shown in Table 3.11-6 above, demolition, site preparation, grading, building construction, installation of underground utilities, and paving activities could generate sound levels exceeding 75 dBA L_{EQ} (12-hour) at nearby NSLUs. As the distance between future project locations and sensitive receptors would vary widely depending on the project, additional calculations were completed to identify the distance at which construction activity would need to occur for noise levels at NSLUs to be kept below 75 dBA L_{EQ} (12-hour). As shown in Table 3.11-6, the distance to the 75 dBA contour ranges from approximately 73 feet to 183 feet; therefore, it is reasonable to conclude that noise levels would exceed the threshold of 75 dBA L_{EQ} (12-hour) if construction activity occurred within approximately 185 feet of an NSLU. For a future project that requires only select types of construction activity (e.g., demolition or coating application), the distances at which the threshold of 75 dBA L_{EQ} (12-hour) is assumed to be exceeded are shown in Table 3.11-6.

Nighttime construction could occasionally be required in specific circumstances, such as to accommodate concrete pours during lower temperature hours or to reduce temporary conflicts with traffic or operation of nearby uses. If required, nighttime construction would be limited to those

activities needing to occur during nighttime hours and would be limited to a few nights of work rather than throughout the entire construction period of an individual project. For example, nighttime construction could be required for concrete pouring during the foundation phase of the Performing Arts Center project to allow proper curing. The center of this near-term project site would be located approximately 140 feet north of the nearest off-site residences; adjacent on-campus buildings would not be in use during these hours. Using the FTA methodology described above, construction noise levels during the paving phase of this near-term project were calculated at this distance. The two loudest pieces of equipment would be a paver and a roller, which would generate a combined noise level of 77.3 dBA L_{EQ} (12-hour) at a distance of 140 feet, above the 75 dBA L_{EQ} (12-hour) limit.

Special Events

Noise is currently generated by occasional outdoor special events at the City College campus such as athletic events and outdoor student gatherings. These special events may involve the use of amplification equipment. Specific noise levels for each event cannot be defined since sound level expectations are different for various types of sports or events. The noise levels generated by special events on campus primarily affect the surrounding academic and administrative uses on campus, although they may also be audible from off-campus locations.

No new types of outdoor special events are anticipated, as there are no new types of facilities proposed under the FMP that would accommodate such events. In addition, the timing of such events is anticipated to remain consistent with existing conditions wherein outdoor events typically end by 10:00 p.m., when classes conclude. Outdoor sporting events would continue within North Campus as the improvements proposed in this area would not relocate the outdoor fields. The new outdoor amphitheater proposed adjacent to Saville Theatre could relocate outdoor gatherings to a location where they do not occur under existing conditions. Design details for this long-term project are not known at this stage. Noise levels associated with gathering areas may therefore vary significantly depending on the type of event, whether amplified equipment is used, and the size of gatherings. Because specific plans for the use of this area are not available, including site layouts or locations of potential noise-amplification equipment, outdoor gathering spaces that propose new sources of amplification equipment are considered to have the potential to result in a substantial temporary increase in noise levels from special events.

Permanent Sources

Vehicular Traffic Noise

The number of students attending on-campus classes at City College is anticipated to increase over the buildout period of the FMP, which has the potential to increase traffic noise levels along surrounding roadways where NSLUs occur. As described above, traffic noise impacts would be considered significant if the traffic noise level at off-site land uses increases above the conditionally compatible noise level for that land use (refer to Table 3.11-4) with the addition of campus-related trips or, where this noise level is already exceeded, increases by more than 3 dBA CNEL. The conditionally compatible noise level for multi-family land uses (70 CNEL) would be applicable to the roadway segments along Park Boulevard and B Street.

Based on the anticipated traffic volumes for existing (baseline 2025), future (2045), and future with project scenarios (Linscott, Law, & Greenspan Engineers [LLG] 2026), noise levels were modeled in the U.S. Department of Transportation (USDOT) Federal Highway Administration's Traffic Noise Model

version 2.5 for the roadway segments anticipated to accommodate the increases in campus-related trips. The calculations provide modeled noise levels at 50 feet from the roadway centerline, which represents the approximate distance to the nearest structures and provides a reference distance at which to compare existing and future noise levels. The model also conservatively assumes flat terrain, though the traffic noise level at an individual receptor location would decrease with the presence of intervening structures, barriers, vegetation, or topography. Table 3.11-7, *Traffic Noise Levels*, provides the modeled noise level for each scenario and the project-generated increase for comparison with the applicable threshold.

Table 3.11-7
TRAFFIC NOISE LEVELS

Roadway Segment	Existing (2025) CNEL	Future (2045) CNEL	Future (2045) with Project CNEL	Project-Generated Increase (CNEL)	Direct Impact?[1]
Park Boulevard					
SR-163 Southbound Off-ramp to A Street	65.6	66.1	66.2	0.1	*No*
A Street to B Street	64.8	65.3	65.5	0.2	*No*
B Street to Broadway	62.7	63.2	63.4	0.2	*No*
Broadway to F Street	54.5	54.7	54.7	<0.1	*No*
B Street					
Park Boulevard to 16th Street	64.0	64.5	64.7	0.2	*No*
11th Avenue to Park Boulevard	63.0	63.5	63.6	0.1	*No*

Source: HELIX 2026

[1] A direct impact to off-site uses would occur if the project would increase noise levels above the applicable threshold or, where the existing noise level exceeds the threshold, would increase noise levels by 3 CNEL. The multi-family residential conditionally compatible noise level (70 CNEL) would be applicable to the roadway segments.

CNEL = Community Noise Equivalent Level

As shown in Table 3.11-7, the future traffic noise levels with the addition of campus-related trips due to future growth would not exceed the compatibility levels identified for adjacent land uses in the General Plan Noise Element. An increase of less than 3 dBA is generally not considered to be perceptible by the average human ear. Traffic noise levels would increase by less than 3 dBA CNEL; therefore, the project would not generate vehicular traffic that results in a substantial permanent increase in ambient noise levels in the vicinity of the project.

HVAC Systems

The exact locations of future heating, ventilation, and air condition (HVAC) systems and other mechanical equipment required for buildings are not known at this time; therefore, this analysis establishes screening distances based on the typical equipment that is anticipated to be required for future projects implemented under the FMP. Overall, it is not anticipated that a substantial increase in noise levels would occur at off-site residences, as the addition of mechanical equipment to new buildings within the campus core would generate similar noise levels to those generated by comparable sources on existing buildings under ambient conditions.

A 20-ton rooftop, commercial HVAC unit manufactured by Carrier with a sound power level of 86.5 dBA (sound pressure level of 78.5 dBA at 1 meter) is used to predict the potential for HVAC-related noise

effects and develop general screening guidelines for future projects (Carrier 2024). Based on this unit type and conservatively not accounting for parapets or other attenuation features, noise levels would attenuate below the City's nighttime single-family residential property line limit of 40 dBA L_{EQ} at approximately 280 feet, below the City's nighttime multi-family residential property line limit of 45 dBA L_{EQ} at approximately 160 feet, below the 60 dBA L_{EQ} limit at campus residential buildings at 30 feet, and below the 65 dBA L_{EQ} limit applicable to non-residential campus buildings at approximately 16 feet. As HVAC systems would typically be installed on central portions of building rooftops, it is not anticipated that they could be installed within 30 feet of other NSLUs within campus. However, new HVAC systems or mechanical equipment could be sited within 280 feet of single-family residences or 160 feet of multi-family residences, thereby potentially increasing noise levels above the applicable limits.

Parking Garages

Noise associated with the operation of parking structures is irregular, specifically for the momentary sources of noise associated with individuals parking and exiting their vehicle (car door slams). Therefore, there is little potential for surface parking areas to result in an average noise level over a 1-hour period that substantially increases ambient noise levels. Furthermore, the FTA estimates a parking garage with 1,000 vehicle movements generates an hourly noise level of 56.4 dBA L_{EQ} at 50 feet from the center of the parking garage (FTA 2018). The largest parking structure anticipated under the FMP is the 500-space parking structure planned for North Campus adjacent to the athletics facilities; however, this parking structure would be separated from noise-sensitive land uses by SR 163 on and off ramps on the west and Park Boulevard on the east. The proposed parking structures that would be nearest an adjacent noise-sensitive land use are the parking garages associated with the mixed-use building proposed just north of Russ Boulevard on North Campus (approximately 80 spaces) and the student commons building to the south of Building R on South Campus (approximately 100 spaces). The center of these parking garages would be located at least 115 feet from the property lines of the adjacent hotel and single-family residences, respectively, and their peak use would occur during daytime hours when the City's more restrictive single-family residential property line limit is 50 dBA L_{EQ}. At 115 feet, the noise level generated by a parking garage with 1,000 vehicle movements would be 47.4 dBA L_{EQ} (FTA 2018), below the applicable City limit. This noise level is also conservative as these parking garages would likely accommodate less than 1,000 vehicle movements in a given hour based on the limited number of spaces provided. Parking garages associated with implementation of the FMP would not result in a substantial increase in noise levels in the project vicinity.

Project-Level

Building A Expansion

The center point of construction for the Building A Expansion project would occur approximately 530 feet from the nearest off-site residences. However, the construction of the Building A Expansion project would occur directly adjacent to existing Building A where offices occur, and construction noise could exceed 75 dBA L_{EQ} (12-hour) at this NSLU, which would be a substantial temporary increase in ambient noise levels. This project would not result in substantial increases in temporary special event noise.

Permanent sources of noise associated with the Building A Expansion project would include HVAC systems, which would be located approximately 350 feet from the nearest multi-family residence and over 600 feet from the nearest single-family residence. Proposed HVAC systems would be located adjacent to the existing Building A but within the proposed building rooftop and coordinated with existing mechanical systems for this building. At this distance, HVAC noise would not conflict with the

noise limits for these uses. No new parking garages are proposed and no additional vehicular traffic compared to that considered in the program-level analysis would be generated. Therefore, the Building A Expansion project would not result in a substantial permanent increase in noise levels in the project vicinity.

Performing Arts Center

The center point of construction for the Performing Arts Center project would occur approximately 240 feet from the nearest off-site residences. However, as construction of the Performing Arts Center project would occur directly adjacent to the existing Building C, construction noise could exceed 75 dBA L_{EQ} (12-hour) at this noise-sensitive campus land use, which would be a substantial increase in temporary noise levels. Although this project would involve the expansion of the existing theater the improvements proposed as part of the Performing Arts Center project would not result in substantial increases in outdoor special event noise as sound associated with the theater would be generally confined to the indoor theater area similar to existing conditions.

Permanent sources of noise associated with the Performing Arts Center project would include HVAC systems, which would be located approximately 130 feet from the nearest multi-family residence and approximately 175 feet from the nearest single-family residence, and would be located adjacent to the existing Building C. At these distances, HVAC noise could conflict with the noise limits for these uses. No new parking garages are proposed and no additional vehicular traffic compared to that considered in the program-level analysis would be generated. Therefore, the Performing Arts Center project could result in a substantial permanent increase in noise levels in the project vicinity.

North Campus Athletic Fields

The center point of construction for the North Campus Athletic Fields project would occur approximately 750 feet from the nearest off-site residences and approximately 530 feet from the nearest noise-sensitive campus building (Building P). Therefore, construction noise is not anticipated to exceed 75 dBA L_{EQ} (12-hour) at noise-sensitive land uses. As described in the program-level analysis above, the improvements proposed as part of the North Campus Athletic Fields project would not result in substantial increases in temporary special event noise as outdoor special events hosted on the fields would remain consistent with those that occur under existing conditions.

The structures proposed for the North Campus Athletic Fields project would be field houses and are not anticipated to include major HVAC systems. Mechanical ventilation for these structures would also be located adjacent to the fields, which are separated from noise-sensitive land uses by freeway on/off-ramps and other roadways. In addition, no new parking garages are proposed and no additional vehicular traffic compared to that considered in the program-level analysis would be generated. Therefore, the North Campus Athletic Fields project would not result in a substantial permanent increase in noise levels in the project vicinity.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP could generate a substantial temporary increase in ambient noise levels in the vicinity of the project during construction if the activities occur within 185 feet of an NSLU, or within

the distances identified in Table 3.11-6 for specific activities. Construction-related noise impacts would be **significant prior to mitigation**.

The FMP would not generate vehicular traffic that results in a substantial permanent increase in ambient noise levels in the vicinity of the project. However, implementation of the FMP could generate a substantial permanent increase in ambient noise levels in the vicinity of the Project site from stationary noise sources and a substantial temporary increase associated with the installation of new amplification equipment. Operational noise impacts from stationary sources would be **significant prior to mitigation**.

Project-Level

Building A Expansion

The Building A Expansion project could generate a substantial temporary increase in ambient noise levels in the vicinity of the project during construction activity, and **t**emporary construction impacts would be **significant prior to mitigation.** Operational impacts would be less than significant.

Performing Arts Center

The Performing Arts Center project could generate substantial temporary and permanent increases in ambient noise levels in the vicinity of the project during construction activity and during operation of HVAC systems, and impacts would be **significant prior to mitigation**.

North Campus Athletic Fields

The North Campus Athletic Fields project would not generate a substantial temporary or permanent increase in noise. **Impacts would be less than significant**. No mitigation is required.

Mitigation Measures

Program-Level

NOI-1 Construction Noise Screening. If project construction activities resulting from implementation of the FMP are proposed within 185 feet of NSLUs or within activity-specific screening distances identified below from NSLUs when only select phases of construction are required, mitigation shall be integrated into the project's construction specifications:

- 137 feet for demolition
- 148 feet for site preparation or utility undergrounding
- 183 feet for grading or paving
- 138 feet for building construction
- 73 feet for architectural coating application

The following measures shall be implemented to minimize temporary noise caused by construction activities to below the applicable CEQA significance thresholds at NSLUs:

a. Require the construction contractor to work with proper administrative controls on equipment operation periods so as not to exceed a 12-hour average sound level of 75

dBA L_{EQ} at NSLUs between 7:00 a.m. and 7:00 p.m. Monday through Saturday except for infrequent circumstances when nighttime work is required for short durations to reduce conflicts with nearby uses or accommodate environmental factors such as heat during concrete pours. Prior to construction activities occurring outside of the hours of 7:00 a.m. to 7:00 p.m. Monday through Saturday, the extended work hours shall be approved by the District construction manager for the project and the following noise control measures shall be implemented, as applicable.

b. Outfit construction equipment with properly maintained, manufacturer-approved or recommended sound abatement features on air intakes, combustion exhausts, heat dissipation vents, and the interior surfaces of engine hoods and power train enclosures.

c. Locate (to the extent practical) steady-state, continuously operating stationary construction equipment such as generators, pumps, and air compressors at least as far as the identified screening distances from nearby NSLUs. If this screening distance cannot be achieved within the project site, consider deployment of temporary noise walls or acoustical blankets that would block direct sound paths between the equipment and the receptor(s) of concern.

d. Position (to the extent practical) construction laydown and vehicle staging areas as far from NSLUs as feasible.

e. Inform, whenever possible and preferably with at least a two-week advanced notice, all neighboring NSLUs located within a 185 foot radius of the project site that a construction project is planned to commence. The notification shall describe the anticipated location of construction activities and the general construction schedule.

f. Where on-campus NSLUs are expected to be less than 185 feet away from construction activity, schedule construction activities anticipated to generate the highest noise levels to avoid the final week of classes. Adjust hours or days of the construction activity to occur before or after these most noise-sensitive periods of the City College academic year.

NOI-2 Outdoor Amplification Equipment Noise Assessment. If future improvement projects for outdoor gathering areas, including an exterior amphitheater, propose the installation of permanent amplification equipment, a noise assessment shall be prepared to analyze potential noise levels at nearby noise-sensitive campus buildings and nearby noise-sensitive land uses. The assessment shall identify if there would be a conflict with the off-campus noise limits established based on the City's Municipal Code or the interior noise limits for on campus buildings of 50 dBA L_{EQ} in non-residential spaces and 45 dBA L_{EQ} in habitable residential buildings based on the proposed hours of use and types of events that may use this amplification equipment. Noise-amplifying equipment, directionality of amplified noise, positioning of bandstands, and potential crowd noise shall be considered. If modeled noise levels exceed the limits, project-specific recommendations for attenuation shall be implemented to reduce noise levels to the applicable noise limit for off-site, noise-sensitive land uses. Noise attenuation features to achieve these limits at off-site locations may include, but are not limited to, the use of permanent barriers blocking the line-of-sight between the noise source and sensitive land

use; relocation of noise-generating equipment; repositioning of noise-generating equipment; and/or enclosing event spaces within partial structures, as feasible.

NOI-3 Stationary Noise Source Assessment. If new or modified stationary noise sources are proposed, including but not limited to major HVAC systems, ventilated parking structures, or similar facilities with noise-generating mechanical equipment not analyzed, the project shall consider the feasibility of incorporating the following screening distances between the noise-sensitive land use and the stationary noise source:

- **HVAC/Mechanical System:** within 280 feet of a single-family residential land use or 160 feet of multi-family residential land use.

If these noise sources are planned to be located outside of the applicable screening distances, no further action shall be required. If such screening distances cannot be achieved based on the project location or needs, or a project requires a noise source type not considered in this analysis, a noise assessment shall be conducted by a qualified acoustician to determine if there would be a conflict with the off-campus noise limits established based on the City's Municipal Code or the interior noise limits for on campus buildings of 50 dBA L_{EQ} in non-residential spaces and 45 dBA L_{EQ} in habitable residential buildings. The noise assessment shall consider the specific source proposed, its location, intervening features, and other relevant site-specific or source-specific information available during project design.

If the noise assessment determines that noise levels would exceed the applicable limits at a receiving land use, project-specific recommendations for attenuation shall be provided within the noise assessment to reduce the noise level below the applicable limit. Such recommendations may include, but are not limited to, relocation, addition of noise barriers or louvers, and use of mufflers or other manufacturer-provided features. For potential conflicts with the on-campus interior noise levels, enhanced building materials such as windows or doors may also be considered, with the aim to reduce indoor noise levels below 35 dB in classrooms and below 40 dB in shared spaces if possible. The noise assessment shall demonstrate that the recommended noise attenuation techniques reduce noise levels at off-campus land uses below the applicable noise limit based on the City's Municipal Code. If feasible attenuation techniques considered in the noise assessment cannot achieve the limit applied at on-campus buildings, the incorporation of attenuation features that do not result in noise levels below this limit may be considered adequate with approval from the District Architect based on evidence that the anticipated exterior noise level would not result in conflicts with the interior noise level standard for the affected building's use.

The recommendations of the noise assessment shall be incorporated into the project plans and detailed within the project's construction specifications where applicable.

Project-Level

Building A Expansion

Mitigation measure NOI-1 would apply to the Building A Expansion project.

Performing Arts Center

Mitigation measures NOI-1 and NOI-3 would apply to the Performing Arts Center project.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measures NOI-1 through NOI-3 would reduce program-level impacts related to the generation of substantial temporary and permanent increases in ambient noise levels in the vicinity of the project to a level that is **less than significant**.

Project-Level

Building A Expansion

Implementation of mitigation measure NOI-1 would reduce project-level impacts related to the generation of substantial temporary increases in ambient noise levels in the vicinity of the project to a level that is **less than significant**.

Performing Arts Center

Implementation of mitigation measures NOI-1 and NOI-3 would reduce project-level impacts related to the generation of substantial temporary and permanent increases in ambient noise levels in the vicinity of the project to a level that is **less than significant**.

3.11.4.2 Ground-Borne Vibration

Threshold 2: Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?

Impact Discussion

Program-Level

Construction

The operation of construction equipment is anticipated to generate the highest levels of vibration during FMP implementation. Construction activities would have the potential to generate levels of ground-borne vibration that could adversely affect nearby vibration-sensitive land uses, buildings that are structurally sensitive to ground-borne vibration, and facilities where equipment and/or activities may be interrupted by vibration. The level of vibration experienced by these land uses would depend on the vibration-generated by the construction equipment or process. The project is anticipated to utilize drilling as an alternative to pile driving given the proximity of sensitive receptors. Therefore, in the absence of impact or vibratory-type pile driving equipment, the largest source of construction vibration is anticipated to be a vibratory roller, which generates a vibration velocity of 94 VdB at 25 feet (FTA 2018). Table 3.11-8, *Screening Distances by Vibration-Sensitive Receptor Type*, identifies screening distances for use of a vibratory roller based on the FTA criteria for building damage, human annoyance, and vibration-sensitive equipment.

Table 3.11-8
SCREENING DISTANCES BY VIBRATION-SENSITIVE RECEPTOR TYPE

Receptor Type	Threshold (VdB)	Distance from Vibratory Roller (feet)
FTA type IV – Buildings extremely susceptible to vibration damage	90	35
Classrooms, libraries (and related learning spaces), and child development centers	83	60
Residential land uses (on- and off-campus)	80	75
Computer equipment rooms, low-power optical microscopes	78	85
Vibration Criterion A (VC-A) (medium- to high-power optical microscopes, microbalances, optical balances, and similar specialized equipment)	66	215

Source: FTA 2018

The construction activity to building or receptor distance would need to be greater than the screening distances shown in Table 3.11-8 in order for vibration exposure to be less than the thresholds identified for each receptor type. As construction of future projects could occur within these distances, construction has the potential to result in the generation of excessive ground-borne vibration.

Operation

Once operational, new and renovated facilities proposed under the FMP are not anticipated to be substantial sources of vibration. Stationary noise sources such as HVAC and other mechanical systems would not be expected to generate excessive vibration levels as these types of equipment are typically designed, manufactured, and installed with vibration-isolating connections and other features to minimize vibration. Increased levels of vibration from this type of equipment would indicate the need for maintenance and after such maintenance is completed, the equipment would generate negligible vibration levels. Increases in campus-related vehicle trips also would not generate excessive vibration as vibration from vehicular traffic is generally not perceptible outside of paved roadways that are properly maintained (Caltrans 2020). The project would not result in the permanent generation of excessive vibration levels.

Project-Level

Building A Expansion

No permanent sources of substantial vibration would be installed for the Building A Expansion project. Building foundations for the Building A Expansion project requiring the use of a vibratory roller could be constructed directly adjacent to the existing Building A, which is vibration sensitive as it contains the Student Health Clinic and classrooms for test proctoring. This project would be constructed approximately 300 feet from the nearest residences; therefore, no effect on off-site residential receptors would occur. However, sensitive on-campus uses (existing Building A) could be affected by construction vibration.

Performing Arts Center

No permanent sources of substantial vibration would be installed for the Performing Arts Center project. Building foundations for the Performing Arts Center project requiring the use of a vibratory roller could be constructed directly adjacent to the existing Building C, which is vibration sensitive as it contains classrooms. This project would be constructed approximately 110 feet from the nearest residences; therefore, no effect on off-campus residential receptors would occur. However, sensitive on-campus uses (existing Building C) could be affected by construction vibration.

North Campus Athletic Fields

No permanent sources of substantial vibration would be installed for the North Campus Athletic Fields project. If required for building foundations or other paved portions of the North Campus Athletic Fields project, a vibratory roller could be used approximately 300 feet from Building P, which is vibration sensitive as it contains classrooms. This project would be constructed approximately 450 feet from the nearest residences. As construction involving vibratory equipment would occur outside of the screening distances for nearby vibration-sensitive land uses, the North Campus Athletic Fields project would not result in the generation of excessive vibration.

Level of Significance Prior to Mitigation

Program-Level

Construction of the FMP projects could result in the generation of excessive ground-borne vibration or ground-borne noise levels. Construction-related impacts would be **significant prior to mitigation**. Operational impacts would be less than significant.

Project-Level

Building A Expansion

Construction of the Building A Expansion project could temporarily generate excessive vibration at on-campus buildings. Project-level impacts related to construction would be **significant prior to mitigation.** Operational impacts would be less than significant.

Performing Arts Center

Construction of the Performing Arts Center project could temporarily generate excessive vibration at on-campus buildings. Project-level impacts related to construction would be **significant prior to mitigation.** Operational impacts would be less than significant.

North Campus Athletic Fields

The North Campus Athletic Fields project would not generate excessive construction or operational vibration. **Impacts would be less than significant**. No mitigation is required.

Mitigation Measures

Program-Level

NOI-4 Construction Vibration Screening and Monitoring. Prior to the commencement of construction of projects under the FMP that would involve the use of heavy earth-moving equipment within the following screening distances, the District shall retain a qualified acoustician to prepare a construction vibration mitigation program to be implemented by the construction contractor(s).

- 35 feet of buildings extremely susceptible to vibration damage such as historic structures (90 VdB threshold)
- 60 feet of classrooms, libraries, and child development centers (83 VdB threshold)
- 75 feet of residential land uses (80 VdB threshold)
- 85 feet of computer equipment rooms, low-power optical microscopes (78 VdB threshold)
- 215 feet of medium- to high-power optical microscopes, microbalances, optical balances, and similar specialized equipment (66 VdB threshold)

If additional information about the specific construction equipment to be used or types of vibration-sensitive equipment that would be affected is available during project planning, the screening distance may also be adjusted to a project-specific distance based on more detailed information about the sensitivity of the equipment and/or affected receptor. Where required, the construction vibration mitigation program shall identify and require measures to reduce vibration resulting from construction activities to the maximum extent practicable, as well as detail construction activity notification and monitoring processes that include, but are not limited to, the following:

a. If feasible, vibratory equipment shall be operated in static mode while it is required to be used within the screening distances noted above.

b. Where vibratory equipment would be used within the applicable equipment screening distance and use of static mode within this buffer distance is infeasible, vibration monitoring shall be performed during construction to establish the level of vibration produced by activities using vibratory equipment. Monitoring shall be conducted when the construction activity would occur within the screening distances noted above. Monitoring shall be conducted using portable vibration-monitoring instrumentation that provides a calibrated record of local ground movement/accelerations. If construction vibration exceeds the appropriate threshold, work shall be stopped and resumed when alternative work methods and equipment can be implemented. Baseline vibration levels at specified locations shall be established prior to the construction activity.

c. Building occupants of vibration-sensitive land uses within the applicable screening distance shall be notified at least two weeks prior to the start of construction. The notification shall describe the anticipated vibration effects and construction schedule.

Project-Level

Building A Expansion

Mitigation measure NOI-4 would apply to construction of the Building A Expansion project.

Performing Arts Center

Mitigation measure NOI-4 would apply to construction of the Performing Arts Center project.

Level of Significance After Mitigation

Program-Level

Implementation of mitigation measure NOI-4 would reduce program-level vibration impacts during construction to a level that is **less than significant**.

Project-Level

Building A Expansion

Implementation of mitigation measure NOI-4 would reduce project-level vibration impacts during construction to a level that is **less than significant**.

Performing Arts Center

Implementation of mitigation measure NOI-4 would reduce project-level vibration impacts during construction to a level that is **less than significant**.

3.11.4.3 Airport Noise Exposure

Threshold 3: 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?

Impact Discussion

Program-Level

The closest airports to the campus are San Diego International Airport, located approximately 1.2 miles northwest of the campus, and the Naval Air Station North Island, located approximately 3.5 miles southwest of the campus. According to the ALUCP prepared for Naval Air Station North Island, the campus is not within the airport noise contours associated with Naval Air Station North Island (SDCRAA 2020). However, the entirety of the City College campus is within the AIA associated with San Diego International Airport, and portions of the campus are within the airport's 60-65, 65-70, and 70-75 dB CNEL noise contours (SDCRAA 2025). Refer to Figure 3.8-1.

In accordance with Policy N.2 of the San Diego International Airport ALUCP, conditionally compatible land uses must incorporate sound attenuation to achieve indoor noise levels as specified in Table 2-1 of the San Diego International Airport ALUCP. According to the San Diego International Airport ALUCP, the

primary campus land use category of "School for Adults – College, University, Vocational/Trade School" is conditionally compatible with these noise contours with the condition that buildings are capable of attenuating exterior noise to 45 dB CNEL with windows and doors closed. The interior noise requirement of the ALUCP would be achieved through adherence to the District acoustical performance and sound transmission requirements for wall construction further detailed in the District Design Guidelines and Standards Manual. As projects proposed under the FMP are implemented, the location of each project and proposed land use would be compared to Table 2-1 of the San Diego International Airport ALUCP (refer to Table 3.11-2) and appropriate sound attenuation measures would be incorporated into the project design if it is designated as conditionally compatible. Conformance with this policy would ensure that projects implemented under the FMP would not expose people residing or working in the project area to excessive noise levels.

Project-Level

Building A Expansion

The Building A Expansion project would occur within the 60-65 dB CNEL dB CNEL noise contour associated with San Diego International Airport. The Building A Expansion project would include the land use categories of School for Adults, Service – High Intensity, and Office – Medical, Financial, Professional Services, Civic. The Service and Office land uses would be compatible with the 60-65 dB CNEL noise contours. The School for Adults land use would be conditionally compatible within this noise contour and buildings would be designed to be capable of attenuating exterior noise to 45 dB CNEL with windows and doors closed. Therefore, the Building A Expansion project would not expose people residing or working in the project area to excessive noise levels.

Performing Arts Center

The Performing Arts Center project would occur outside of the noise contours associated with San Diego International Airport. Therefore, the Performing Arts Center project would not expose people residing or working in the project area to excessive noise levels.

North Campus Athletic Fields

The northernmost portion of the North Campus Athletic Fields project site would occur within the 70-75 dB CNEL noise contour associated with San Diego International Airport while the remainder of the site would occur within the 65-70 dB CNEL noise contour. The North Campus Athletic Fields project would include the following land uses: Sport/Fitness Facility and Recreation Facility – Outdoor. The North Campus Athletic Fields project proposed land use of Recreation Facility – Outdoor would be conditionally compatible within the 70-75 dB CNEL noise contour but does not propose interior spaces and compatible within the 65-70 dB CNEL noise contour. The Sport/Fitness Facility land use, which would only occur within the 65-70 dB CNEL noise contour, would be compatible. As such, the North Campus Athletic Fields project would not expose people residing or working in the project area to excessive noise levels.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not expose people residing or working in the project area to excessive noise levels from aircraft or airports. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.11.5 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to noise is limited to the area directly surrounding the project site, as noise and vibration attenuate quickly with distance and only have the potential to combine with other sources in the immediate vicinity.

3.11.5.1 Increase in Ambient Noise Levels

Cumulative projects in the vicinity of the campus could involve construction activities or new permanent sources of noise which would have the potential to combine with project-related noise sources and result in a substantial increase in ambient noise levels in the vicinity. As described in Section 3.11.4.1 above, noise associated with future campus construction activity has the potential to exceed the 75 dBA L_{EQ} (12-hour) construction noise limit considered in this analysis and consistent with the quantitative limits established in the San Diego Municipal Code. As a result, mitigation measure NOI-1 is proposed for projects located within the screening distances identified in Table 3.11-6. Similarly, a construction noise permit from the City would be required for cumulative projects anticipated to conflict with this limit or result in work outside of the typically allowed hours of construction. The permit would provide conditions for the construction work that limit its potential for excessive noise generation. Nonetheless, construction noise from multiple cumulative projects on- or off-campus adhering to this limit could combine together to result in excessive noise at certain receptors and the cumulative impact would be significant. With implementation of mitigation measure NOI-1 for campus projects occurring within the applicable screening distances, the project would not considerably contribute to the identified significant cumulative impact to excessive ambient noise levels from temporary construction activities.

New stationary sources of noise associated with the residential land uses that surround campus are not anticipated to substantially increase noise levels in combination with new campus noise sources. Surrounding cumulative projects would be subject to the San Diego Municipal Code property line limits that are established to provide an appropriate noise environment based on the applicable land uses. In addition, mitigation measures NOI-2 and NOI-3 require campus projects installing new amplification equipment or new permanent noise sources within identified distances of off-site residences to attenuate noise to the limits established in the San Diego Municipal Code at off-campus properties. As campus projects and future cumulative development projects would be required to adhere to these noise limits for stationary sources, the cumulative impact from these sources is considered less than significant.

The future traffic volumes used in the noise analysis include additional trips to account for growth anticipated in the region (LLG 2026). As shown in Table 3.11-7, traffic noise levels under the future with project condition would not exceed the conditionally compatible noise level at nearby residential land uses and would not increase by a perceptible amount (3 dB) from existing conditions. Therefore, with both regional growth and the increase in campus-related trips, there would not be a substantial increase in traffic noise levels and the cumulative impact would be less than significant.

Overall, the project's contribution to a significant cumulative increase in ambient noise levels **would not be cumulatively considerable**.

3.11.5.2 Ground-Borne Vibration

Cumulative projects in the vicinity of the project could involve construction activities that require vibration-generating equipment similar to the project; however, vibration attenuates rapidly with

distance. Equipment generating substantial vibrations would need to be used concurrently and within very close proximity to a single vibration-sensitive receptor to result in a cumulative impact to that receptor. As cumulative projects would occur outside of the campus boundaries and campus projects constructed within the screening distances identified in Table 3.11-8 and the project would implement mitigation measure NOI-4, it is not anticipated that a cumulative project together with a FMP project could combine to result in a significant vibration impact. In addition, there are no substantial sources of operational vibration anticipated to be generated by the FMP projects; therefore, these projects would not contribute to cumulative impacts related to vibration. Overall, cumulative ground-borne vibration impacts would be **less than significant**.

3.11.5.3 Airport Noise Exposure

As discussed in Section 3.11.4.3, portions of the campus are within the San Diego International Airport noise contours. Therefore, nearby cumulative development projects are also anticipated to be exposed to airport noise. Future projects within these noise contours would be located in areas where the proposed land use is compatible with aircraft noise and project designs would incorporate sound attenuation to achieve indoor noise levels as specified in Table 2-1 of the San Diego International Airport ALUCP. Therefore, neither the project nor cumulative projects would have the potential to contribute to a significant cumulative impact regarding airport noise exposure. **No cumulative impact would occur**.

3.12 Population and Housing

This section addresses the potential population and housing impacts that could occur as a result of future projects implemented under the FMP. The existing conditions and regulatory setting related to population and housing are also addressed.

3.12.1 Environmental Setting

3.12.1.1 Regional and Local Population

In 2022, the total population within San Diego County (County) was 3,287,306 individuals and within the City of San Diego (City) was 1,374,790 individuals according to the San Diego Association of Governments (SANDAG) Series 15 Regional Growth Forecast (SANDAG 2025). This represents an approximately 5.8 percent increase from the County's total population in 2010, which was 3,095,313 individuals (SANDAG 2010a), and an approximately 5.3 percent increase from the City's total population in 2010, which was 1,301,617 individuals (SANDAG 2010b). According to SANDAG's Regional Growth Forecast, the County is projected to have a population of 3,400,250 individuals by 2050, with 1,441,149 of those individuals being residents of the City. These population increases would represent a 3.4 percent increase in the County's population and a 4.8 percent increase in the City's population between 2022 and 2050 (SANDAG 2025).

3.12.1.2 Regional and Local Housing

SANDAG estimates that, as of 2022, there were a total of 1,235,642 housing units within the County and 553,921 housing units within the City (SANDAG 2025). The City's housing stock is made up of 56 percent single-family homes, while 44 percent is comprised of multi-family homes or other housing types such as mobile homes. Additionally, the City's housing stock consists of approximately 47 percent owner-occupied housing units and 53 percent renter-occupied housing units. It is estimated that 40 percent of households are comprised of non-related roommates or individuals living together and that 3.2 percent of rental units are vacant (City 2021). According to the SANDAG Regional Growth Forecast, the total number of households within the City is projected to increase to 627,668 by 2035, and to 661,533 by 2050. This would represent a 19.4 percent increase in housing units from 2022 to 2050 (SANDAG 2025).

According to the 6th Cycle Regional Housing Needs Assessment (RHNA) Plan, there are 171,685 housing units needed in the region between 2021 and 2029, with 108,036 of those housing units needed within the City (SANDAG 2020). Based on these numbers, there is an annual projected demand in the City for 13,505 new housing units, which would exceed the pace of housing unit growth projected through 2050 in the SANDAG Regional Growth Forecast by 2029. While the City's Housing Element identifies potentially developable land zoned for residential use that meets the City's RHNA allocation and supports programs that incentivize housing production (City 2021), the City does not build housing on private property and housing production is therefore dependent on developers or other agencies. For example, in 2024, the City permitted 8,782 new homes, approximately 12 percent of which (1,061 homes) were deed restricted (City 2025). Therefore, the demand for new housing units in the City, especially affordable housing, is projected to continue to outpace the City's housing supply.

3.12.1.3 Regional and Local Employment

According to the SANDAG Regional Growth Forecast, the total number of jobs within the County was 1,611,632 in 2022. The number of jobs available in the County is anticipated to increase by 10.6 percent by 2050, resulting in a total of 1,782,389 jobs countywide in 2050 (SANDAG 2025). Jobs within the City are projected to increase at a slower rate than in the County as a whole. The total number of jobs within the City was 876,977 in 2022, while the projected number of jobs in the City is estimated to be 907,847 by 2035 and 944,440 by 2050. This would represent a 7.7 percent increase in jobs in the City from 2022 to 2050 (SANDAG 2025). The primary employment industries in the City are driven by a combination of technology, healthcare, and tourism. The fastest growing industries in the City include construction, information systems, and finance and real estate, which are projected to grow by 65 percent, 41 percent, and 30 percent by 2035 respectively (City 2021).

3.12.1.4 City College Population, Housing, and Employment

As of Fall 2025, 6,575 students were enrolled in on-site courses at City College. An additional 11,022 students were enrolled in either off-site programs (i.e., high school courses receiving District credits) or online courses. However, as these students do not regularly attend the physical City College campus, use campus facilities, or generate daily trips to campus, their enrollment does not contribute to campus-wide operational environmental impacts. Under CEQA, only activities that result in a direct physical change or a reasonably foreseeable indirect physical change in the environment must be analyzed. Thus, this environmental analysis focuses on the on-campus student population growth. As of July 2025, there were 1,652 total City College employees (District 2025).

City College does not currently offer on-campus housing. However, the area northeast of the C Street/16th Street intersection is planned to be developed with the 797-bed Affordable Student Housing building with associated student amenities and outdoor use areas. As this project has previously undergone environmental review in accordance with CEQA and is under construction, it is considered part of the baseline condition.

3.12.2 Regulatory Framework

A summary of state, regional, District, and local regulations that pertain to population and housing is provided below. No federal regulations regarding population and housing apply to the project.

3.12.2.1 State

Assembly Bill 648

Assembly Bill (AB) 648 added Section 81055 to the California Education Code to exempt the construction of university housing development projects, as defined in Public Resources Code (PRC) Section 21080.58, from the local zoning regulations of a city, county, or city and county when such projects are constructed on property owned or leased by a community college district. To meet the requirements of Education Code Section 81055, an off-campus housing project must be located within 0.5 mile of a main campus or within 0.5 mile of a satellite campus that existed before July 1, 2025. For housing projects including faculty or staff units, a portion of the units must be made available at rents affordable to extremely low income and lower income faculty and staff.

3.12.2.2 Regional

San Diego Association of Governments Regional Plan

SANDAG's latest regional plan, the 2025 Regional Plan, is a regional transportation and sustainability plan that aims to provide a blueprint for a more livable, equitable, and innovative future (SANDAG 2025). It combines required elements of a Regional Comprehensive Plan, Regional Transportation Plan (RTP), and Sustainable Communities Strategy (SCS), into one document that looks towards 2050. As such, the 2025 Regional Plan must comply with specific state and federal mandates, including an SCS per Senate Bill (SB) 375 that achieves Greenhouse gas (GHG) emission reduction targets set by the California Air Resources Board (CARB); compliance with federal civil rights requirements (Title VI); and environmental justice considerations, air quality conformity, and a public participation process. The Regional Plan is updated every four years and incorporates updates in population, housing, income/employment, and land use information to revise projections and identify changes in policy strategies or project investments needed to achieve these state and federal mandates. The City College campus is in an area of the City anticipated to accommodate job and housing growth in the region for 2035 and 2050 on the SCS Land Use Pattern maps prepared by SANDAG (SANDAG 2025).

Regional Housing Needs Assessment

SANDAG is required by state law to complete a RHNA in consultation with the California Department of Housing and Community Development to determine the region's housing needs in four income categories—very low, low, moderate, and above moderate. The current adopted RHNA for the San Diego region covers the eight-year period from April 15, 2021 through April 15, 2029. The RHNA allocates housing needs in the four income categories for each of the cities and the County to use in their housing element. The cities and County are required to update their housing elements to include RHNA allocations every eight years; updates can be required every four years if updated housing elements are not adopted by certain timelines.

3.12.2.3 District

San Diego Community College District Strategic Plan

The San Diego Community College District Strategic Plan includes an objective to develop an Enrollment Management Plan, which is essential for establishing the quantitative measures that will be used to monitor progress toward the Strategic Plan's goals, particularly those related to student success, access, and institutional resiliency. It positions enrollment management as a Districtwide priority in response to post-pandemic enrollment declines, shifting regional demographics, and changing student needs. The Strategic Plan notes that the Enrollment Management Plan will supply the metrics aligned with the Student-Centered Funding Formula, inform future planning cycles, and support coordinated strategies across the District campuses.

3.12.2.4 Local (Non-Regulatory)

City of San Diego General Plan Housing Element

The 2021-2029 Housing Element of the City of San Diego General Plan serves as a policy guide to address the comprehensive housing needs of the City (City 2021). State law mandates that local governments outline the housing needs of their community, the barriers or constraints to providing that housing, and

actions proposed to address these concerns. Updated housing elements are required to be updated at least every eight years. The six major goals of the 2021-2029 Housing Element are to construct quality housing, improve the existing housing stock, provide new affordable housing, enhance quality of life, integrate sustainable development, and publicize City housing needs and resources. While the City College properties are not included on the adequate sites inventory, the Housing Element also encourages colleges such as City College to partner with others to provide as much student housing as possible on and adjacent to campuses and transit.

Downtown Community Plan

The Downtown Community Plan serves as a policy guide for land use, housing, mobility, urban design, parks, and economic development in the City's core (City 2006). It envisions a vibrant, mixed-use regional center with high residential and employment growth, emphasizing livability, sustainability, and strong connections to the waterfront and Balboa Park. The plan promotes walkable neighborhoods, diverse and affordable housing, and a multimodal transportation system with Complete Streets and transit-oriented development. Relevant goals and policies relating to housing include:

3.2-G-2 Maintain a range of development intensities to provide diversity, while maintaining high overall intensities to use land efficiently and permit population and employment targets to be met.

3.3-G-1 Provide a range of housing opportunities suitable for urban environments and accommodating a diverse population.

3.4-G-1 Continue to promote the production of affordable housing in all of downtown's neighborhoods and districts.

3.4-G-3 Increase the supply of rental housing affordable to low-income persons.

3.12.3 Thresholds of Significance

Thresholds used to evaluate potential population and housing impacts are based on CEQA Guidelines Appendix G. A significant population and housing impact could occur if implementation of the proposed project would:

1. 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); or

2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.12.4 Impact Analysis

3.12.4.1 Population Growth

Threshold 1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact Discussion

Increases in population, housing, and employment are generally considered to be social or economic effects, as opposed to physical effects, which are the focus of CEQA analysis. Economic or social effects on their own do not constitute significant effects on the environment. However, there are circumstances where social and economic changes could indirectly cause physical environmental impacts or result in changes to environmental resources, such as air quality, traffic, or noise levels. In other situations, lead agencies may evaluate social or economic changes related to a physical change in determining the significance of a physical change (CEQA Guidelines Section 15131). Therefore, the following analysis focuses on the effects of growth specifically as they relate to physical environmental effects. Additional discussion of economic growth is provided in Section 5.0, *Other CEQA Considerations*.

Program-Level

Construction of the individual projects under the FMP would temporarily increase construction employment opportunities. Given the relatively common nature and scale of proposed future projects, the demand for construction employment is anticipated to be met within the existing and future labor market in the region. The size of the construction workforce would vary during the different stages of construction but would not be of a size such that a substantial number of laborers from outside of the County would relocate for these employment opportunities. The District also specifically prioritizes hiring construction contractors from the local workforce pursuant to its Community Benefits Agreement with the San Diego Building and Construction Trades Council and many craft unions, which applies to construction contracts valued at $1 million or more. The Community Benefits Agreement outlines requirements for hiring local workers based on zip code; requires 80 percent of craft hours to be performed by County residents, active-duty military dependents, or current or former District students; and supports apprenticeship programs to continue development of the local construction workforce. Therefore, project construction would not directly or indirectly induce substantial population growth.

As discussed further in Section 2.1.3, a conservative growth rate of 1.5 percent growth in the on-campus population per year was used to estimate enrollment increases throughout buildout of the FMP through 2045. With the application of this growth rate, 8,856 on-campus students are anticipated to attend City College in 2045, which would represent an increase of 2,281 on-campus students compared to Fall 2025 baseline conditions. Employee growth is also anticipated at the same rate to maintain the current student-to-staff ratio, which reflects established operational standards for delivering academic programs and student services at City College. Approximately 2,225 employees are anticipated to be required in 2045, which represents an increase of 573 employees compared to 2025 baseline conditions.

The FMP does not propose new housing that would result in a direct increase in the regional population. Under the FMP, the City College on-campus student population and employee population would increase. However, it is anticipated that this enrollment and job growth would occur as a result of an

increase in students and employees from the project region, as community colleges are generally designed to target and serve local communities. Increases in on-campus enrollment would be expected to come from the existing and projected regional population and would not draw new people to the region. This projected regional growth is accounted for in SANDAG's population projections for the County. The regional population is expected to increase by approximately 112,944 individuals from 2022 through 2050 and reach 3.4 million, which represents an increase of 3.4 percent over this period. As discussed above, the on-campus population is projected to grow by 2,854 individuals (2,281 students and 573 employees) from 2025 through 2045, which represents a growth rate of 1.5 percent per year. While the increase in on-campus population growth considered in this PEIR would outpace regional population growth, this 1.5 percent annual on-campus growth rate reflects the potential for attracting and accommodating more students in on-campus courses through implementation of planned improvements to campus facilities, academic offerings, and student services, while also providing a conservative approach for environmental analysis. City College would continue to serve the regional population as it grows and would not induce substantial regional population growth.

The projects proposed under the FMP also would not indirectly induce population growth as no extension of infrastructure is proposed that would allow for future development where it does not currently occur. The FMP projects would connect to existing utilities, including water, sewer, electricity and telecommunication services. The surrounding area is already developed with urban uses and infrastructure, and the connection of proposed buildings to existing infrastructure would not provide new utilities or other infrastructure to support growth in a previously undeveloped area. Therefore, the project construction would not indirectly induce substantial population growth.

Project-Level

The near-term projects are individual physical improvements proposed on campus that are part of the overall FMP. They would replace existing functions on campus and provide enhanced spaces for existing programs. Therefore, the near-term projects would not individually induce campus enrollment or regional growth.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not induce substantial unplanned direct or indirect population growth in an area. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.12.4.2 Housing Displacement

Threshold 2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Discussion

Program-Level

Housing on the City College campus is under construction northeast of the C Street/16th Street intersection and, once completed, will provide 797 beds in addition to amenities and outdoor use areas. No additional housing is offered on the campus and the FMP does not plan for demolition of the housing

currently under construction. As such, no existing housing would be permanently removed, thereby necessitating the construction of replacement housing elsewhere.

The projects implemented under the FMP would require the demolition of various campus facilities, including recreational, educational, administrative, and student support facilities. The removal of these facilities would require the temporary relocation of these services within existing campus buildings or the temporary use of other modalities, such as online classes. The students, faculty, staff, and community members who use these facilities would temporarily use the alternative locations for the services offered by these facilities. As none of the future projects would involve the demolition of housing, demolition of these various facilities would not necessitate the construction of replacement housing elsewhere. Further, the demolished campus facilities would be replaced with expanded and upgraded facilities, the environmental impacts of which are analyzed throughout this PEIR. As such, implementation of the FMP would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Project-Level

The Building A Expansion project would require the demolition of the existing campus bookstore and dining facilities within Building D, the Performing Arts Center project would require the demolition of the existing theater, and the North Campus Athletic Fields project would require the demolition of athletic fields and the existing field house. The removal of these facilities would require the individuals who use these facilities to temporarily use other facilities providing similar services. However, the near-term projects would not involve the demolition of housing and demolition of these facilities would not necessitate the construction of replacement housing. Implementation of the near-term projects would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not displace substantial numbers of existing people or housing, thereby necessitating the construction of replacement housing elsewhere. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.12.5 Cumulative Impact Analysis

The geographic scope for cumulative analysis regarding impacts to population and housing is the San Diego region.

3.12.5.1 Population Growth

Cumulative development projects could either directly or indirectly induce population growth that results in environmental effects, thereby resulting in significant cumulative population growth impacts. The Affordable Student Housing project considered in this cumulative analysis would result in the direct addition of 797 beds on the City College campus but would not result in unplanned population growth as this project will provide housing for City College students who are already residents of the region. As the FMP does not propose the development of additional on-campus housing, it would not contribute to cumulative impacts related to direct population increases through the provision of additional housing. As discussed above, the on-campus population is expected to increase by 2,854 individuals (2,281 students and 573 employees) from 2025 through 2045; however, this growth would occur as a result of

increased enrollment by students from the project region and is therefore accounted for in SANDAG's population projections for the County and the City. Further, the project would not result in the removal of a barrier of growth, such as utility extension or expansion, that would reasonably result in the intensification or development of land and indirectly induce growth. Additionally, because the campus is surrounded by existing development, it is unlikely that the approval and construction of projects under the FMP would lead to an intensification of the land uses in the immediate vicinity of the site. Therefore, the project contribution to cumulative impacts related to population growth **would not be cumulatively considerable**.

3.12.5.2 Housing Displacement

Cumulative development projects in the region would involve the demolition of existing housing and construction of new housing, which could result in significant cumulative impacts related to housing displacement and the need for replacement housing. However, as the proposed FMP would not demolish existing housing, it would not contribute to these potential impacts. The project contribution to cumulative impacts related to the displacement of substantial numbers of existing people or housing **would not be cumulatively considerable**.

3.13 Public Services

This section addresses the potential public services impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to public services are also addressed.

3.13.1 Environmental Setting

3.13.1.1 Fire Protection

City College does not have its own fire department and therefore relies on the City of San Diego Fire-Rescue Department (SDFD), who is responsible for responding to emergencies that occur throughout the City of San Diego (City) and on the campus itself. SDFD has 52 fire stations responsible for protecting 343 square miles. If additional support is needed, SDFD relies on automatic aid agreements with jurisdictions adjacent to the City. These agreements ensure that the closest engine company or medical unit can respond to an incident on the City College campus, regardless of its jurisdiction.

The SDFD service area is divided into Engine Administrative Boundaries, each of which has a fire station that is the first to respond to calls within its boundary when possible. The majority of South Campus is within Engine Administrative Boundary 11, which is served by Fire Station 11 located at 945 25th Street, approximately 0.5 mile east of campus. Small, open space areas along the western side of South Campus are located within Engine Administrative Boundaries 1 and 4, which are served by Fire Station 1 located at 1222 First Avenue, approximately 0.6 mile west of campus, and Fire Station 4, located at 404 8th Avenue approximately 0.6 mile southwest of campus. North Campus is within Engine Administrative Boundary 3, served by Fire Station 3 located at 725 West Kalmia Street, approximately one mile northwest of campus. Fire Station 11 possesses a fire engine, aerial truck and a paramedic unit, while Fire Station 1 possesses each of these in addition to a Battalion Chief's vehicle, a chem pickup rig, a light and air specialized rig, a medic rescue rig, a mobile canteen, and an x-ray unit for the explosive device team. Fire Stations 3 and 4 each possess a fire engine, with Fire Station 4 also providing an Urban Search and Rescue unit (City 2025).

According to the Performance Audit of the Fire-Rescue Department's Emergency Medical Response Process (Performance Audit) prepared by the City (2026), the average response time for the City College area (Council District 3) was 7 minutes and 41 seconds from fiscal year 2023 through fiscal year 2025, which exceeds the arrival time standard of 6 minutes and 30 seconds that is established by the SDFD. The Performance Audit concluded that these slow response times were largely attributed to slow turnout times and included recommendations for the SDFD such as annual reporting on the dispatch process and response times to City leadership and the establishment of an internal SDFD policy to standardize how turnout time is tracked and evaluated. The Performance Audit does not include recommendations for the construction of additional fire stations (City 2026).

3.13.1.2 Police Protection

The District provides its own police services for its campuses through the District Police Department. The District Police Department is a Peace Officer Standards and Training certified, full-service police agency operating in compliance with applicable state standards under California Penal Code Section 13522. District Police Department officers are authorized by California Penal Code Section 830.32 and California Education Code Section 72330 with law enforcement authority that extends to any place in the state

while performing their primary duty, consistent with the authority of municipal law enforcement officers. The District Police Department employs approximately 40 officers who provide the primary law enforcement response on and around District properties such as the City College campus. The District Police Department has a Memorandum of Understanding (MOU) with the City of San Diego Police Department that establishes operational cooperation between the two agencies, including response and investigative responsibilities for certain incidents occurring on or adjacent to District property (District 2026a). Such coordination includes information sharing, coordinated responses, investigation of specific types of crimes, and additional law enforcement support when needed.

The District Police Department is headquartered at 1536 Frazee Road but has a campus police business office on the southern edge of the City College campus in the Career Technology Center (Office V-100). According to the District Police Department Policy Manual (District 2026b), calls are dispatched based on the following priority levels and allotted response thresholds:

a) Priority 1 calls, defined as those involving life or death situations, serious crimes in progress, and/or imminent injury, should be dispatched within 5 minutes.

b) Priority 2 calls are defined as emergency calls that are non-life threatening. All priority 2 calls should be dispatched within 30 minutes.

c) Priority 3 calls are non-emergency calls where there is no immediate or potential threat to life or property, including cold reports, service calls and officer self-initiated activity. Priority 3 calls should be handled as soon as practicable.

3.13.1.3 Schools

The San Diego Unified School District (SDUSD) provides transitional-kindergarten through 12th grade school services to most of the City. As City College does not currently offer on-campus student housing, the demand for schools would be from commuting students, faculty, and staff with children. Transitional-kindergarten through 12th grade students living in off-campus households would typically attend the schools designated by SDUSD for their neighborhood; therefore, these students would be spread throughout the school district.

Three SDUSD school campuses are within or in close proximity to the City College campus. Two of these, East Village Middle College High School and Garfield High School, are located within the City College campus. The third, San Diego High School, is located northeast of the City College campus, nestled between North Campus and South Campus.

City College also contains the Early Education Center, which serves infants, toddlers, and preschoolers. The Early Education Center is a training lab for Child Development program students to observe, interact, and implement the ideas and theories that are presented as part of their academic program. (City College 2025).

3.13.1.4 Parks

City College provides a variety of on-campus recreational opportunities for students via both formal class settings and recreational amenities. The City Department of Parks and Recreation maintains a vast network of parks, recreational facilities, and open space throughout the City. Refer to Section 3.14, *Recreation*, for a discussion of specific on- and off-campus park and recreation facilities and services.

3.13.1.5 Other Public Services

City College operates the San Diego City College Library located in the southwestern portion of South Campus in Building R, which offers library services to faculty and students. Various other student-focused facilities are also located throughout the campus, including the Student Health Center, which includes a student health clinic and mental health counseling located in Building A, and the Tutorial/Learning Center located in Building L, which offers free tutoring services to City College students. The Saville Theatre is a performing arts theater comprised of 282 seats and offers events and shows that are open to the public.

In addition, the San Diego Public Library operates 36 library branches throughout the City. The Library Master Plan (City 2023) identified the City College campus as within Zone D – Downtown/South, which encompasses neighborhoods south of Interstate (I-) 8, west of I-805, and north of State Route (SR) 94. This area is anticipated to require an increase from 76,000 square feet (SF) of library space to at least 123,000 to 136,000 SF of library space to accommodate the population growth anticipated in this area through 2040. The Central Library is not assigned to a particular zone of the City but serves as a system-wide resource for City residents and is conveniently located downtown, approximately 0.5 mile south of campus.

3.13.2 Regulatory Framework

A summary of state, District, and local regulations that pertain to public services is provided below. No federal or regional regulations regarding public services apply to the project.

3.13.2.1 State

California Building Standards Code

The California Building Standards Code, Title 24 of the California Code of Regulation (CCR), includes the California Building Code (CBC; Title 24, Part 2), California Wildland Urban Interface Code (CWUIC; Title 24, Part 7), and California Fire Code (CFC; Title 24, Part 9). The California Building Standards Code is updated every three years with recent updates strengthening fire safety standards, especially for development within Very High Fire Hazard Severity Zone (VHFHSZs). Typical fire safety requirements of the CBC include the installation of fire sprinklers and smoke detectors; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the requirement to provide access for emergency responders. The CWUIC prescribes specific building standards and construction methods for new buildings in a VHFHSZ. These standards address materials use for roofing, ventilation, walls, and more; require preparation of fire protection plans; and establish defensible space requirements. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. See Section 3.18, *Wildfire*, for additional details related to the fire-related requirements of these building codes.

3.13.2.2 District

District Design Guidelines and Standards Manual

The District Design Guidelines and Standards Manual includes various District policies for the design and construction of new facilities related to fire protection. The Project Programming section requires each

project to include a detailed Fire Accessibility Plan that meets Division of the State Architect (DSA) standards by showing fully dimensioned fire department access routes, all fences and gates along those routes, and the locations of hydrants, valves, fire department connections, and sprinkler risers, along with identification of the hydrants used for fire-flow testing and the required approval stamp from the local fire authority. The Interior Finishes section establishes fire-safety and code-compliance standards requiring all interior finishes to meet CBC flame-spread and smoke-development limits, with Class A-rated wall and ceiling materials in egress corridors, stairways, and assembly areas, and chemically resistant finishes in instructional and lab spaces. Lastly, the Site Design section specifies that all fire access roads must comply with the requirements of CBC Title 24, Part 9, Appendix D.

District Board Policies

Board Policy 7600 establishes a campus police department under the supervision of a Chief of Police who reports directly to the District Executive Operations Officer. The primary purpose of the District Police Department is to enforce the law on or near District campuses and properties. This Board Policy notes that public safety services must adhere to principles of diversity, equity, inclusion, and accessibility, and shall advance access to education by creating safe, secure, peaceful, and inclusive campus environments. In cooperation with the Chief of Police, the Chancellor is authorized to issue other regulations necessary for the administration of the police department.

3.13.2.3 Local (Non-Regulatory)

City of San Diego General Plan

The City of San Diego General Plan includes a Public Facilities, Services, and Safety Element (City 2024a) which addresses public services intended for the benefit of the City's existing and projected residents. The Public Facilities, Services, and Safety Element include goals and policies addressing the City's fire protection services.

PF-D.1 Locate, staff, and equip fire stations to meet established response times as follows:

a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 5 minutes drive time in the most populated areas.

b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.

- This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.

- This equates to 1-minute dispatch time, 1.5 minutes company turnout time and 8 minutes drive time spacing for multiple units in the most populated areas.

PF-D.5 Maintain service levels to meet the demands of continued growth and development, tourism, and other events requiring fire-rescue services.

a. Provide additional response units, and related capital improvements as necessary, whenever the yearly emergency incident volume of a single unit providing coverage for an area increases to the extent that availability of that unit for additional emergency responses and/or non-emergency training and maintenance activities is compromised. An excess of 2,500 responses annually requires analysis to determine the need for additional services or facilities

PF-D.6 Provide public safety related facilities and services to assure that adequate levels of service are provided to existing and future development.

According to the City of San Diego General Plan, a three mile distance between fire stations is typically sufficient to achieve response time objectives, although topography and terrain throughout the City present considerable demands on fire-rescue services under various conditions and can also affect response times (City 2024a). The Environmental Impact Report (EIR) prepared for the General Plan Update identified planned fire station facilities within the City, which included a planned fire station located within the East Village neighborhood which could serve the City College campus (City 2024b).

Although the General Plan states that the first unit should arrive within 7 minutes and 30 seconds 90 percent of the time from when Fire Dispatch receives the 911 call, the SDFD has a more stringent policy, which states that the first unit should arrive within 6 minutes and 30 seconds from receipt of dispatch notification 90 percent of the time (City 2026).

3.13.3 Thresholds of Significance

Thresholds used to evaluate potential public services impacts are based on CEQA Guidelines Appendix G. A significant public services impact could occur if implementation of the proposed project would 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 following public services:

1. Fire protection;
2. Police Protection;
3. Schools;
4. Parks; or
5. Other Public Facilities.

3.13.4 Impact Analysis

3.13.4.1 Fire Protection

Threshold 1: 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 fire protection?

Impact Discussion

Program-Level

Implementation of the FMP could increase demand for SDFD services due to an increase in facilities and population on the City College campus. However, implementation of projects under the FMP would not require the construction of new SDFD facilities or the expansion of existing fire protection facilities. As discussed in Section 3.13.1.1, the campus is within the existing service areas of SDFD Fire Stations 1, 3, 4, and 11 and has therefore already been accounted for in terms of SDFD service areas within the City.

According to the Performance Audit prepared for the SDFD, the average response time for the City College area was 7 minutes and 41 seconds from fiscal year 2023 through fiscal year 2025, which exceeds the arrival time standard of 6 minutes and 30 seconds that is established for the SDFD (City 2026). These response times reflect existing citywide conditions and trends rather than conditions caused by development within the campus. Although the Performance Audit did not identify additional fire station facilities as a recommendation for the SDFD to improve their response times, the City's General Plan EIR identified a planned fire station for the East Village neighborhood that would serve the City College campus (City 2024b). See Section 3.13.1.1 and Section 3.13.2.3 above for additional details. Once implemented by the City, this fire station would improve response times to the City College campus. When proposed, the City would be responsible for project-level environmental review of the proposed fire station and implementation of applicable mitigation measures from the City's General Plan EIR or other environmental review process.

In addition, the future projects proposed under the FMP would not generate new or excessive fire risk, as each individual project design would comply with applicable state and District building regulations in place to reduce the risk of fire. These would include the CBC and CFC fire safety and building materials requirements and the District requirements related to emergency access, sprinkler and fire hydrants, building materials, and compliance with CBC fire safety requirements. The FMP would not result in the need for new or physically altered fire protection facilities; therefore, no substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities would occur.

Project-Level

Implementation of the near-term projects proposed under the FMP would not require the construction of new SDFD facilities or the expansion of existing fire protection facilities. The Building A Expansion project and the Performing Arts Center project would each be served by SDFD Fire Station 11, while the North Campus Athletic Fields project would be served by SDFD Fire Station 3. Each of the near-term project sites are already accounted for in the SDFD service area and the slight increase in building area associated with each of these projects would not result in the need for physically expanded SDFD

facilities. Further, each of the near-term projects would be designed and constructed in accordance with relevant CBC, CFC, and District fire safety policies discussed further in the program-level analysis above. Implementation of the near-term projects would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.13.4.2 Police Protection

Threshold 2: 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 police protection?

Impact Discussion

Program-Level

The growth in enrollment and employment that is projected on campus could increase demand for police protection services due to an increase in the population on the City College campus. Campus population growth would not affect police protection facilities off campus where commuting student, faculty and staff would reside as the increase in the on-campus population would come from the existing regional population (refer to Section 3.12, *Population and Housing*) where police services are already provided.

As discussed in Section 3.13.1.2, the District operates its own police department and has an existing office at City College. The District Police Department has established response times based on the priority level of an emergency call (refer to Section 3.13.1.2). As the population at the City College campus increases through buildout of the FMP, the District would be responsible for ensuring the District Police Department is adequately staffed or supported by neighboring jurisdictions, such as the San Diego Police Department, to ensure that these response times are maintained. No specific improvements to physical police protection facilities are proposed under the FMP or anticipated to be required to serve the on-campus population. Should the District determine that new or expanded police protection facilities are required to ensure that adequate response times are maintained on the City College campus, the new or expanded facility would undergo environmental review to determine if it is within the scope of the environmental analysis contained in this PEIR and, if so, applicable mitigation measures would be applied. As is the case for other future campus projects, if a future police protection-related project is determined to be outside of the scope of this PEIR, then a separate environmental document would be prepared, and potentially significant environmental impacts would be mitigated to the extent feasible.

As discussed above, implementation of the FMP would serve the existing regional population, which is expected to grow throughout buildout of the FMP through 2045. Should new or expanded City police protection facilities be necessary to serve this increase in regional population in the future, the City

would provide environmental review under CEQA and the facility would be required to comply with City development regulations and environmental review requirements. Implementation of the FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or the need for new or physically altered police protection facilities.

Project-Level

The near-term projects would each be serviced by the District Police Department. As the near-term projects would accommodate projected enrollment growth and would not directly contribute to population growth on the campus, the near-term projects would not require expanded police protection facilities. As discussed in the program-level analysis above, the District would ensure that the established response times for the District Police Department are maintained as the City College campus population increases throughout the buildout of the FMP. Implementation of the near-term projects would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or the need for new or physically altered police protection facilities.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.13.4.3 Schools

Threshold 3: 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 schools?

Impact Discussion

Program-Level

The growth in enrollment and employment that is projected on the City College campus would come from the existing and projected regional population as discussed further in Section 3.12, *Population and Housing*, and implementation of the FMP would not increase the off-campus population where school services are currently provided. While increases in the regional population could increase the demand for school services and require new or expanded SDUSD facilities, these facilities would not be necessitated by the increase in the on-campus population of City College. As discussed in Section 3.13.1.3, the children of students, faculty, and staff that live off campus would typically attend the schools designated by SDUSD for their neighborhood; therefore, these students would be spread throughout the school district. SDUSD would conduct environmental review of all new school facilities required to accommodate regional growth within their district, and compliance with federal, state, and local regulations would be required prior to the construction of the new facilities. Implementation of the FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities.

Project-Level

The near-term projects would not require the construction of new school facilities or the expansion of existing school facilities. As the near-term projects would not directly contribute to population growth but would accommodate projected enrollment growth, the near-term projects would not increase the City's population of school-aged children or require expanded school facilities. Implementation of the near-term projects would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.13.4.4 Parks

Threshold 4: 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 parks?

Impact Discussion

Program-Level

As discussed further in Section 3.14, *Recreation*, the District offers a variety of recreational facilities and programs on the campus in addition to the various City parks and recreational facilities in the surrounding area. While the campus population is anticipated to increase over the buildout period of the FMP and, therefore, increase the use of the existing campus and City parks and recreational facilities and programs, such growth would not exceed that expected for the region (refer to Section 3.12, *Population and Housing*). Projects implemented under the FMP would include the reconfiguration and/or expansion of existing recreational facilities and development of new recreational facilities on campus. The new and expanded recreational facilities proposed under the FMP would continue to provide students and surrounding community members with adequate recreational opportunities as the campus population grows.

The recreational opportunities provided for students and staff on campus may reduce the demand that campus populations place on public recreational facilities in other areas of the City. As growth in the on-campus student population would not bring growth beyond that anticipated for the region, the project is not anticipated to result in a substantial increase in the demand for or use of off-campus recreational facilities that would not otherwise be developed or maintained by the City. Implementation of the FMP is not anticipated to substantially increase the use of City parks such that there would be a need for new or physically altered parks in the City beyond those planned by the City.

Although the projects proposed under the FMP include new and physically altered recreation and open space areas on the campus, environmental impacts associated with those projects are analyzed throughout this PEIR, and mitigation is prescribed where feasible for significant impacts. As such, the

FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks.

Project-Level

The implementation of the near-term projects proposed under the FMP would not require the construction of new public parks or the expansion of existing public parks. As the near-term projects would not directly contribute to population growth on- or off-campus, none of the near-term projects would require expanded park facilities off-campus. The North Campus Athletic Fields project would include improvements to existing sports fields and a walk-jog path on campus, the impacts of which are analyzed throughout this PEIR at the project level. During construction of these facilities, the programs that typically use these facilities would temporarily increase the use of similar City or District athletic facilities but not to an extent that would result in the need for new athletic facilities off campus. The near-term projects proposed under the FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.13.4.5 Other Public Facilities

Threshold 5: 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 other public facilities?

Impact Discussion

Program-Level

As discussed above, the City of San Diego Public Library currently operates 36 branches throughout the City. Although City College provides students with library services at the San Diego City College Library located in the southeast portion of South Campus, students may also choose to utilize the various public libraries throughout the City. The City College campus is identified within the San Diego Public Library Master Plan (City 2023) planning zone of Zone D – Downtown/South, which is anticipated to require additional library space to accommodate the projected population growth in this part of the City. As discussed further in Section 3.12, *Population and Housing*, the on-campus enrollment growth that is anticipated at the City College campus would come from existing and planned regional population growth and would not draw new people to the region served by the City of San Diego Public Library system. The new or renovated City libraries proposed by the City would be required to undergo separate environmental review in which feasible mitigation would be prescribed for potentially significant impacts. Therefore, the FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities.

Project-Level

The implementation of the near-term projects would not require the construction of new public facilities or the expansion of existing public facilities. As the near-term projects would not directly contribute to population growth on the campus and would rather accommodate projected enrollment growth, none of the near-term projects would require expanded off-campus public facilities. The potential environmental impacts associated with the public facilities proposed by the near-term projects are analyzed throughout this PEIR and mitigation is prescribed where feasible for impacts identified as potentially significant. The near-term projects proposed under the FMP would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.13.5 Cumulative Impact Analysis

The provision of public services is generally specific to jurisdictional providers and therefore confined by service boundaries. Typically, changes in development influence the demand for public services to be provided within a local city, county, or service district. The geographic scope for analysis of cumulative impacts to public services is the City, which generally aligns with the service boundaries for SDFD, the City Police Department, SDUSD, the City's Park and Recreation Department, and the City's library services.

3.13.5.1 Fire Protection

Cumulative development projects throughout the City could result in an increase in demand for fire protection services and therefore result in the need for new or expanded fire protection facilities within the City. Similar to the project, cumulative development projects would not generate excessive fire risk as individual project design would be in accordance with applicable state and local regulations related to fire safety. Nonetheless, the environmental effects of future fire protection facilities are not known and would be determined during project-specific environmental review; therefore, consistent with the City's General Plan EIR, cumulative impacts related to future fire protection facilities are conservatively considered significant. As discussed above, the FMP's incremental impact, including the near-term projects, to fire protection services would be less than significant as fire protection services are provided by SDFD under existing conditions and the slight increase in building area and on-campus population would not substantially decrease the ability of SDFD to provide fire protection services or require additional facilities. Therefore, the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to cumulative impacts related to the provision of new or expanded fire protection facilities.

3.13.5.2 Police Protection

Cumulative development projects throughout the City would primarily be served by the San Diego Police Department, whereas police services on the City College campus are provided primarily by the District Police Department, with interagency coordination provided through an MOU. Cumulative development projects could result in an increase in demand for police protection services from the San Diego Police

Department and could result in the need for new or expanded police protection facilities within the City. The cumulative development projects would be within the City and therefore served by the San Diego Police Department, which has target response times similar to the District Police Department. Should cumulative development in the City necessitate the construction or expansion of additional San Diego Police Department facilities to maintain these response times, the facility would undergo separate environmental review and feasible mitigation measures would be prescribed to reduce potentially significant impacts. Nonetheless, the environmental effects of future police protection facilities are not known and would be determined during project-specific environmental review; therefore, consistent with the City's General Plan EIR, cumulative impacts related to future police protection facilities are conservatively considered significant. As discussed in Section 3.13.4.2 above, the FMP would result in less than significant impacts related to the provision of new or expanded police protection facilities. Therefore, the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to cumulative impacts related to the provision of new or expanded police protection facilities.

3.13.5.3 Schools

The cumulative development projects within the City could result in an increase in the population of school-aged children and could therefore require additional SDUSD facilities. Although the District is not required to pay school development impact fees, other cumulative development within the City would be required to provide these fees as applicable, which would allow SDUSD to build new and expanded school facilities where necessary. The approval for construction of such facilities would be subject to environmental analysis requirements in accordance with CEQA, and applicable mitigation measures would be applied to such a project. Nonetheless, the environmental effects of future school facilities are not known and would be determined during project-specific environmental review; therefore, consistent with the City's General Plan EIR, cumulative impacts related to future school facilities are conservatively considered significant. However, as discussed in Section 3.13.4.3 above, the FMP would result in less than significant impacts related to the provision of new or expanded school facilities. Therefore, the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to cumulative impacts related to the provision of new or expanded school facilities.

3.13.5.4 Parks

The identified cumulative projects could cause growth that leads to an increase in demand for public parks in the City. However, the identified cumulative development projects would be included in the growth projections upon which the City bases the planning of future parks on in planning documents such as the Parks Master Plan. Cumulative development projects within the City would be required to provide park fees as applicable, which would allow the City to provide additional park space to meet standards outlined in the Parks Master Plan. The approval for construction of such facilities would be subject to environmental analysis requirements in accordance with CEQA, and applicable mitigation measures would be applied to such a project. Nonetheless, the environmental effects of future parks are not known and would be determined during project-specific environmental review; therefore, consistent with the City's General Plan EIR, cumulative impacts related to future parks are conservatively considered significant. However, as discussed in Section 3.13.4.4 above, the FMP would result in less than significant impacts related to the provision of new or expanded parks. Therefore, the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to cumulative impacts related to the provision of new or expanded parks.

3.13.5.5 Other Public Facilities

Additional public facilities such as libraries could be required with implementation of cumulative development projects in the City. However, similar to the FMP, the potential growth induced by these projects would be included in growth projections used for the planning of additional library facilities in the San Diego Public Library Master Plan. The approval for construction of these facilities would be subject to environmental analysis requirements in accordance with CEQA, and applicable mitigation measures would be applied to such a project. Nonetheless, the environmental effects of future public facilities are not known and would be determined during project-specific environmental review; therefore, consistent with the City's General Plan EIR, cumulative impacts related to future public facilities are conservatively considered significant. However, as discussed in Section 3.13.4.5 above, the FMP would result in less than significant impacts related to the provision of new or expanded public facilities. Therefore, the FMP, including the near-term projects, **would not result in a cumulatively considerable contribution** to cumulative impacts related to the provision of new or expanded public facilities.

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3.14 Recreation

This section addresses the potential recreation impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to recreation are also addressed.

3.14.1 Environmental Setting

City College provides a broad range of recreational facilities, activities, and services that cater to the varied recreational and wellness needs of students, faculty, staff, and members of the surrounding community. The School of Health, Exercise Science, Nutrition, and Athletics provides degree and certificate programs in fitness training and coaching, kinesiology, and nutrition. Non-competitive exercise and sports classes are also available to students. City College has 13 competitive sports teams, including badminton, baseball/softball, basketball, cross country, soccer, tennis, and volleyball/beach volleyball. The physical recreational facilities described below support the majority of these programs at City College as well as providing space for unofficial recreational activities. As City College students and staff do not reside on campus (and most will continue to reside off-campus even with completion of the Affordable Student Housing project), a discussion of off-campus recreational facilities in the City of San Diego (City) that may be used by these groups is also provided below. The City College baseball and beach volleyball programs also utilize off-site, City-owned recreational facilities described further below.

3.14.1.1 On-Campus Recreational Opportunities

The City College campus contains various types of recreational facilities located on the northern section of North Campus. In this section of North Campus, City College maintains a soccer field, the Betty Hock Softball Field, six tennis courts, a 11,894-gross square foot (GSF) handball court building, a 3,886-GSF fitness center, and the Harry West Gymnasium. The soccer field is separated from the rest of North Campus by a freeway on/off ramp and accessible via a concrete underpass.

In addition to these developed facilities, the City College campus contains outdoor gathering areas, primarily along the western edge of South Campus adjacent to Park Boulevard. The Seeds@City program also produces fruits and vegetables from urban farm areas that additionally serve as outdoor laboratory for the sustainable agriculture program. These urban farm areas total approximately one acre and include an area between the Learning Resource Center (Building R) and Saville Theater, an area west of the Harry West Gym (Building P-3), raised beds adjacent to the Sciences building (Building S), and a greenhouse atop the Administrative Services building (Building T) (City College 2026).

3.14.1.2 Off-Campus Recreational Opportunities

While the City College Affordable Student Housing project is currently under development, the majority of City College students would continue to reside in off-campus housing. As such, it is likely that many students, as well as faculty and staff, who live throughout the City use recreational facilities provided in off-campus locations. In addition, the City College baseball and beach volleyball teams utilize off campus facilities at Morley Field in Balboa Park and Mission Beach, respectively. The City's Department of Parks and Recreation manages public parks and recreational facilities throughout the City. As of the preparation of the City's Parks Master Plan approved in 2021, the City's park system consisted of over 42,000 acres of parks and open space (City 2021), including several parks or recreational facilities within

approximately one mile of the City College campus. The Parks Master Plan does not identify any on-campus facilities as existing or proposed parks counted towards the City's parks goals.

City-managed parks and recreational facilities within approximately one mile of the City College campus include Balboa Park located to the north of campus across I-5, Tweet Street Mini-Park located approximately 0.1 mile west of campus, Fault Line Park located approximately 0.4 mile south of campus, Horton Plaza Park located approximately 0.5 mile southwest of campus, G-Street Mini-Park located approximately 0.6 mile southwest of campus, and Davis-House Mini-Park located approximately 0.7 mile southwest of campus, (City 2025). Two additional parks are also under development near campus: St. Joseph's Park located approximately 0.4 mile west of campus and East Village Green Park located approximately 0.2 mile south of campus (City 2025).

3.14.2 Regulatory Framework

A summary of state, District, and local regulations that pertain to recreation is provided below. No federal or regional regulations regarding recreation apply to the project.

3.14.2.1 State

Quimby Act

The Quimby Act (California Government Code Section 66477) authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate land for parks, pay an in-lieu fee, or perform a combination of the two. The Quimby Act also requires a city or county to adopt standards for recreational facilities in its general plan recreation element if it is to adopt a parkland dedication/fee ordinance. The amount of land dedicated or fees paid shall be based upon the residential density, which shall be determined on the basis of the approved or conditionally approved tentative map or parcel map and the average number of people per household. City College is not subject to Quimby Act requirements because it is not a local government entity; however, park fees collected by the City support the development and maintenance of off-campus facilities that may be used by City College students and staff.

3.14.2.2 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the District Design Guidelines Standard Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and the District's Sustainability Levels.

Sustainability Plan

The following goal has been incorporated into the District's Green Growth program and shall be considered on future facility improvement projects and include the following related to recreation.

Health and Wellbeing Goal 3: Provide places where students can play, explore, experiment and find joy.
Key Performance Indicator (KPI): Maintain a variety of interactive spaces (e.g., maker spaces, nature play areas, art labs, gaming zones, experiment hubs).

3.14.2.3 Local (Non-Regulatory)

While City College is not subject to local land use planning documents, campus populations use off-site recreational facilities located throughout the City; therefore, a summary of City General Plan and Downtown Community Plan strategies related to recreation is provided below with an emphasis on policies that are relevant to the District regarding to shared facility use.

City of San Diego General Plan

The Recreation Element of the City's General Plan guides the planning, development, and maintenance of the City's numerous parks, open spaces, and recreational facilities. Three main types of parks are defined, which include population-based parks, resource-based parks, and open space lands. Through the implementation of the Parks Master Plan, new policies that emphasize sustainable design, universal accessibility, and the prioritization of underserved communities were established. The plan also promotes an increase in joint-use agreements with schools and public agencies as well as new innovative recreational features such as mini-parks, urban plazas, and community gardens (City 2024). The Recreation Element of the General Plan includes the following policy that is relevant to the District:

RE-E.2 Work with local school districts', colleges, and universities to expand development of on-campus joint use recreation facilities including multipurpose courts, parking lots, and multi-purpose athletic fields.

Downtown Community Plan

The Downtown Community Plan provides an updated framework for the expansion, enhancement, and integration of parks and recreational facilities within the downtown area. The Downtown Community Plan identifies a comprehensive open space system that includes new major parks, such as the East Village Green and Harmony Park, as well as various additional plazas, pocket parks, linear greenways, and freeway-lid parks intended to improve the public's access to recreational amenities throughout downtown. The Downtown Community Plan also outlines improvements to pedestrian and bicycle connectivity for the existing San Diego Bay Waterfront and Balboa Park by improving walkability via enhanced streetscapes, designated greenways, and the proposed John Nolen Greenway Loop. The Downtown Community Plan further supports joint-use recreational opportunities through coordination with educational institutions, including San Diego City College and San Diego High School, to expand shared access to athletic fields and facilities as outlined in the policy below (City 2006).

Policy 4.1-P-12 Expand and develop shared use programs and agreements for existing recreation and open spaces with San Diego High School, City College, and other future school playgrounds/ open space.

3.14.3 Thresholds of Significance

Thresholds used to evaluate potential recreational impacts are based on CEQA Guidelines Appendix G. A significant recreational impact could occur if implementation of the proposed project would:

1. 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; or

2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.14.4 Impact Analysis

3.14.4.1 Use of Existing Recreational Facilities

Threshold 1: 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?

Impact Discussion

Program-Level

The District offers a variety of recreational facilities and programs on the campus in addition to the various City parks and recreational facilities in the surrounding area, as outlined in Section 3.14.1 above. While the campus population is anticipated to increase over the buildout period of the FMP and, therefore, increase the use of the existing campus and City parks and recreational facilities and programs, such growth would not exceed that expected for the region (refer to Section 3.12, *Population and Housing*). As detailed further under Section 3.14.4.2 below, both the long-term and near-term projects proposed under the FMP would include the reconfiguration and/or expansion of existing recreational facilities and development of new recreational facilities on campus. The existing recreational facilities and open space areas on North and South Campus have historically been utilized for recreational purposes by both campus populations and the surrounding community and are maintained by the District Facilities Services Department staff on an ongoing basis. The new and expanded recreational facilities proposed under the FMP would continue to provide students and surrounding community members with recreational opportunities as the campus population grows.

Although student housing is currently being built on campus, it would house a small percentage of City College's total students, faculty, and staff; therefore, most individuals would continue to live off campus in the surrounding communities and use off-campus recreational facilities. Increased use of privately operated for-profit facilities is not considered an adverse impact because it is an economic benefit to those facilities and provides funding for ongoing upgrades that offset effects of increased use of such facilities. It is noted, however, that the extent of recreation opportunities provided for students and staff on campus may reduce the demand that campus populations place on public recreational facilities. As growth in the on-campus student population would not bring growth beyond that anticipated for the region, the project is not anticipated to result in a substantial increase in the demand for or use of off-campus recreational facilities that would not otherwise be developed or maintained using City funds. New residential developments located off campus are subject to the City's development impact fees, which contribute to the dedication of land for park or recreational purposes, as a condition for the approval of a tentative map or parcel map for private development projects. In addition, funding for maintenance of public recreational facilities is provided through property assessments and taxes that are distributed to the City, who is in turn responsible for providing and maintaining such recreational

facilities in compliance with the standards outlined in the Parks Master Plan to ensure adequate and equitable recreational opportunities are provided throughout the City.

As the campus currently offers recreational facilities, the FMP would provide new and expanded recreational facilities, and off-campus recreational opportunities are available throughout the City, implementation of the FMP would not 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.

Project-Level

The near-term projects proposed under the FMP (the Building A Expansion project, the Performing Arts Center project, and the North Campus Athletic Fields project) would not cause a direct increase in the campus' population and, therefore, would not result in a long-term increase in the use of the existing campus and City parks and recreational facilities and programs. During the construction of the North Campus Athletic Fields project, the existing athletic facilities on this project site would be closed and would result in the temporary loss of recreational facilities on campus. Although this temporary closure would cause a temporary increase in use of off-campus recreational facilities, this would be short-term and would not result in the substantial physical deterioration of these facilities. The North Campus Athletic Fields project would include recreational facilities as further detailed in Section 3.14.4.2 and would enhance recreational opportunities provided for the campus community. The near-term projects proposed under the FMP would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.

Level of Significance Prior to Mitigation

Future projects implemented under the FMP, including the near-term projects, would not increase the use of existing parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.14.4.2 Expansion of Recreational Facilities

Threshold 2: 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?

Impact Discussion

Program-Level

The long-term projects implemented under the FMP would include the reconfiguration of existing recreational facilities and development of new recreational facilities. These would include, but are not limited to, a fitness center building, new tennis courts, pedestrian walkways, and other passive outdoor spaces. Although implementation of long-term projects under the FMP would involve the construction and expansion of recreational facilities on campus which have the potential to cause an adverse physical effect on the environment, these potential impacts are discussed throughout this PEIR as part of the proposed FMP, and mitigation measures have been prescribed as feasible where potentially significant impacts are identified. No off-site construction or expansion of recreational facilities would occur such

that implementation of the FMP would have an adverse physical effect on the environment beyond what has been described throughout the relevant sections of this PEIR. The potential for City-initiated park projects described in Section 3.14.4.1 that would serve planned increases in the City's population are outside of the scope of this environmental analysis and would undergo review by the City as these maintenance or construction activities are proposed.

Project-Level

Building A Expansion

The Building A Expansion project would involve the construction of a campus bookstore, dining facilities, a welcome center, parental resource center, the Institutional Effectiveness Division, the Office of Student Affairs, and other faculty/staff spaces. The Building A Expansion project would alter the existing passive recreation space associated with the adjacent Gorton Quad but would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Performing Arts Center

The Performing Arts Center project would involve the construction of a new theater, a street-level lobby space, a widened proscenium arch in the theater, connection to a future exterior amphitheater, and rooms for dance and music programming. The Performing Arts Center project would not include recreational facilities and would therefore not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

North Campus Athletic Fields

The North Campus Athletic Fields project would include the addition of sand volleyball facilities and renovations of existing Betty Hock Softball Field and soccer fields. The sand volleyball courts would be located north of the existing tennis courts. The softball field would be rotated and new dugouts, an announcer's booth, a backstop, batting cages, and bullpens would be constructed. A new field house would be constructed adjacent to both the softball field and volleyball courts. Improvements to the soccer field would include a walk-jog path, new field house containing restrooms and storage space, and an announcer's booth. The existing field house would be demolished. The soccer field would be replaced in its entirety, including new irrigation and a widened configuration to meet standard soccer pitch dimensions.

Although the North Campus Athletic Fields project would involve the construction and expansion of recreational facilities on campus and would have the potential to cause an adverse physical effect on the environment, these potential impacts are discussed throughout this PEIR at the project level, and mitigation measures have been prescribed as feasible where potentially significant impacts are identified. Further, the construction of the sand volleyball facilities would allow the City College beach volleyball program to utilize this on-campus facility rather than off-campus beach volleyball courts, which would reduce the use of these off-campus facilities compared to existing conditions. No off-site construction or expansion of recreational facilities would occur as part of the North Campus Athletic Fields project such that an adverse physical effect on the environment would occur beyond what has been described throughout the relevant sections of this PEIR.

Level of Significance Prior to Mitigation

Program-Level

Future projects implemented under the FMP would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment beyond that disclosed in other areas of this PEIR. **Program-level impacts would be less than significant**. No mitigation is required.

Project-Level

The near-term projects would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment which is not analyzed in other areas of this PEIR. **Project-level impacts would be less than significant**. No mitigation is required.

3.14.5 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to recreation is the City. Changes in development typically influence the demand for recreational facilities which serve residents on a community-wide basis.

3.14.5.1 Use of Existing Recreational Facilities

The identified cumulative projects could cause substantial physical deterioration of existing neighborhood and regional parks or recreational facilities due to an increase in use. However, all cumulative projects within the City would be required to pay applicable development impact fees and property taxes, which would offset potential impacts to recreational facilities and provide the City with funding to provide repairs, expansion, or construction of new recreational facilities to adequately serve the community. Specific recreational development proposed by or necessitated by the cumulative projects would be subject to environmental review, and if there is a potential for adverse physical effects on the environment due to the construction or expansion of recreation facilities, mitigation measures would be identified to the extent feasible. The General Plan, Parks Master Plan, and various community plans identify the City's plans to provide adequate recreational facilities as the population of the City grows. Therefore, as the enrollment growth under the FMP would not be beyond what is planned for the City, cumulative project impacts would be **less than significant**.

3.14.5.2 Expansion of Recreational Facilities

As discussed above, the on-campus population growth could result in an increase in use of the campus and City's various recreational programs and facilities. However, the increase in use would not require the construction or expansion of existing recreational facilities outside of the project site. Some of the long-term and near-term projects implemented under the FMP would include the reconfiguration and/or expansion of existing recreational facilities and the construction of new recreational facilities and, therefore, have the potential to cause an adverse physical effect on the environment. However, these potential cumulative impacts are discussed throughout the PEIR as part of the proposed FMP, and, where feasible, mitigation measures have been prescribed where potentially significant impacts are identified for both the near-term and long-term projects. Therefore, cumulative project impacts would be **less than significant**.

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3.15 Transportation

This section addresses the potential transportation impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to transportation are also addressed. This section relies on the information and analysis in the Vehicle Miles Traveled (VMT) Analysis (Linscott, Law & Greenspan Engineers [LLG] 2026a), provided as Appendix I to the PEIR.

3.15.1 Environmental Setting

The City College campus is surrounded by multiple major highways and local roadways that intersect the parcels comprising the campus. North Campus generally occurs in the southeast corner of Interstate (I-) 5 and State Route (SR) 163 and is bounded by I-5 on the north, Russ Boulevard on the south, Park Boulevard on the east, and SR 163 on the west. South Campus is bounded by Russ Boulevard on the north, C Street and Broadway on the south, I-5 on the east, and Park Boulevard and 15th Street on the west. Access to the campus is provided by surrounding roadways, the San Diego trolley, and bus service provided by the Metropolitan Transit System (MTS). The roadway network, transit network, and pedestrian/bicycle infrastructure available in the vicinity of the project site are described further below.

3.15.1.1 Roadway Network

The existing major roadways described below are those that accommodate the majority of campus-related vehicle trips. Their existing and planned configurations are described below (LLG 2026b).

- **Park Boulevard** is a north-south facility and is classified as a Cycleway/Transitway in the Downtown Community Plan Street Typologies Map. It is currently constructed as a four-lane divided roadway with a raised median and then transitions to a one-lane southbound roadway. Between I-5 and K Street, a combination of Class II bike lanes, Class III bike routes, and Class IV cycle tracks are provided. Sidewalks are provided on both sides of the roadway. Two-hour parking is permitted. The posted speed limit is 30 miles per hour (mph).

- **A Street** is an east-west facility and is classified as an Autoway in the Downtown Community Plan Street Typologies Map. It is currently constructed as a three-lane one-way undivided roadway. Class II bike routes are provided along A Street. Sidewalks are provided on both sides of the roadway. Two-hour parking is permitted. There is no posted speed limit.

- **B Street** is an east-west facility and is classified as a Cycleway in the Downtown Community Plan Street Typologies Map. It is currently constructed as a three-lane one-way undivided roadway. There are no bicycle facilities along B Street adjacent to campus. Sidewalks are provided on both sides of the roadway. Curbside parking is not permitted. There is no posted speed limit.

- **F Street** is an east-west facility and is classified as an Autoway in the Downtown Community Plan Street Typologies Map. It is currently constructed as a three-lane one-way undivided roadway. There are no bicycle facilities along the segment of F Street south of the campus. Sidewalks are provided on both sides of the roadway. Paid parking is permitted. There is no posted speed limit.

- **11th Avenue** is a north-south facility and is classified as an Autoway in the Downtown Community Plan Street Typologies Map. It is currently constructed as a three-lane one-way undivided roadway. There are no bicycle facilities along the segment of 11th Avenue near campus. Sidewalks are provided on both sides of the roadway. Curbside parking is not permitted. There is no posted speed limit.

- **16th Street** is a north-south facility and is unclassified in the Downtown Community Plan. It is currently constructed as a two-lane divided roadway with a two-way left-turn lane. There are no bicycle facilities along 16th Street adjacent to campus. Sidewalks are provided on both sides of the roadway. Two-hour parking is permitted. There is no posted speed limit.

3.15.1.2 Transit Network

The existing public transit network accessible from campus consists of bus and light rail ("trolley") service operated throughout San Diego County (County) by MTS. Specifically, MTS operates bus service (including "Rapid," the high-frequency, limited stop bus service) and the San Diego Tolley light rail services within the downtown area. The City College Trolley Station is located southwest of the Park Boulevard/C Street intersection and is served by the Blue, Orange, and Silver lines. Numerous bus routes serve the area; however, MTS Routes closest to the campus include Routes 7, 215, 225, and 235. These transit services are summarized below:

- **The Blue Line** runs between University Town Center Transit Center and San Ysidro Transit Center. This line travels through University City, University of California San Diego, Old Town Transit Center, Downtown San Diego, and South Bay cities including Chula Vista and National City. Weekday service typically begins around 4:30 a.m. with 7.5 to 15-minute headways during peak periods and runs until approximately 1:00 a.m. Weekend service begins around 5:00 a.m. with 15-minute headways, extending slightly later on Saturdays than Sundays.

- **The Orange Line** runs between the Arnele Avenue Station in the City of El Cajon and the Courthouse Station in downtown San Diego (some peak hour trips continue to Santa Fe Depot). The route travels along the I-8 and SR 94 corridors, serving East County cities including El Cajon and La Mesa, and continues through southeastern San Diego into downtown. Weekday service begins around 4:30 a.m. with 15-minute headways (more frequent during peak overlap segments) and ends around 12:00 a.m. Weekend service typically operates with 15 to 30 minute headways between 5:00 a.m. and 12:00 a.m.

- **The Silver Line** operates as a loop between Santa Fe Depot and the Convention Center Station via downtown San Diego. The route circulates clockwise and counterclockwise through the Gaslamp Quarter and waterfront areas. There are 9 stations along this heritage streetcar loop. Service is limited compared to other trolley lines as this line operates on select days (typically weekends and special events) with 30-minute headways for limited hours.

- **Bus Route 7** runs between 11th Avenue & C Street and University Avenue & College Avenue. The route runs along Broadway, Park Boulevard, and University Avenue. There is a total of 37 stops along this route. Weekday service begins at 4:25 a.m. with 15 to 30-minute headways and ends at 1:44 a.m. Saturday service begins at 5:37 a.m. with 30 to 45-minute headways and ends at 12:59 a.m. Sunday service begins at 6:06 a.m. with 15 to 30-minute headways and ends at 10:59 p.m.

- **Bus Route 215** runs between San Diego State University Transit Center and India Street & C Street. The route runs along Broadway, Park Boulevard, Howard Avenue, El Cajon Boulevard, and College Avenue. There is a total of 12 stops along this route. Weekday service begins at 4:33 a.m. with 15-minute headways and ends at 12:45 a.m. Saturday and Sunday service begins at 4:48 a.m. with 30-minute headways and ends at 12:20 a.m.

- **Bus Route 225** runs between Otay Mesa Transit Station and India Street & C Street. The route runs along Eastlake Parkway, East Palomar Street, SR 805, SR 94, and Broadway. There is a total of 12 stops along this route. Weekday service begins at 4:23 a.m. with 15-minute headways and ends at 9:49 p.m. Saturday and Sunday service begins at 4:46 a.m. with 45-minute headways and ends at 9:16 p.m.

- **Bus Route 235** runs between Escondido Transit Station and Santa Fe Depot. The route runs along SR 15, SR 94, and Broadway. There is a total of 10 stops along this route. Weekday service begins at 6:03 a.m. with 15-minute headways and ends at 10:35 p.m. Saturday and Sunday service begins at 5:01 a.m. with 30-minute headways and ends at 10:05 p.m.

3.15.1.3 Pedestrian and Bicycle Network

The pedestrian network in the project vicinity includes sidewalks along surrounding roadways; there are no missing sidewalks adjacent to campus. Additional descriptions of sidewalk locations along roadways in the project vicinity are provided in Section 3.15.1.1.

There is also a network of existing and planned bicycle facilities identified as Class I, Class II, Class III, or Class IV per the Downtown Community Plan in the project vicinity. These classifications of bicycle facilities are described as follows:

- **Class I (Bike Paths):** Include shared-use or multi-use bike paths for exclusive use by bicyclists, pedestrians, and non-motorized modes of travel. Class I bike paths are physically separated from vehicular traffic and can be constructed in roadway right-of-way or exclusive right-of-way.

- **Class II (Bicycle Lanes):** Include one-way bicycle lanes defined by pavement striping and signage to allocate a portion of a roadway for bicycle travel. Striping may include a separated buffer from vehicle or parking lanes, and can include green paint to identify conflict zones.

- **Class III (Bike Routes):** Include bike routes shared with motor vehicle traffic in the same lane. Signage and street markings known as “sharrows” or shared lane markings can delineate that a road is a shared-use facility.

- **Class IV (Cycle Track):** Includes a hybrid bicycle facility that combines a separated path with a conventional bicycle lane. Cycle tracks are bikeways located in roadways right-of-way but separated from vehicle lanes by physical barriers, flexible posts, on-street parking curbs, or other objects and can provide one- or two-way travel for exclusive bicycle use.

The existing bicycle network in the project vicinity includes a Class III bike route along A Street (between Third and Ninth Avenue) and three facilities along Park Boulevard including a Class II bicycle lane (between SR 163 and Russ Boulevard), a Class IV cycle track (between Russ Boulevard and C Street), and a Class III bike route (between C Street to K Street). Bicycle facilities planned for B Street include a Class IV Cycle Track from Third Avenue to Sixth Avenue and a Class II Bike Lane from Sixth Avenue to I-5. Park

Boulevard is planned to enhance the existing bicycle facilities with a Class IV Cycle Track between SR 163 and Russ Boulevard as well as between C Street and K Street (City of San Diego [City] 2006).

3.15.2 Regulatory Framework

A summary of federal, state, regional, District, and local regulations that pertain to transportation is provided below.

3.15.2.1 Federal

Americans with Disabilities Act of 1990

The Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications. To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. The ADA does not specifically name all of the impairments that are covered. Numerous standards and guidance documents have been developed to facilitate the proper implementation of the ADA. The Department of Justice ADA Title III Regulation 28 CFR Part 36 prohibits discrimination on the basis of disability by public accommodations and requires places of public accommodation and commercial facilities to be designed, constructed, and altered in compliance with the accessibility standards established by this part. The regulation includes Standards for Accessible Design in Appendix A of 28 CFR Part 36, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

3.15.2.2 State

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law, changing the way transportation impact analysis is conducted under CEQA. Within the CEQA Guidelines, these changes include elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant transportation impacts. In December 2018, new CEQA Guidelines implementing SB 743 (CEQA Guidelines Section 15064.3), along with the Governor's Office of Planning and Research (OPR; now Governor's Office of Land Use and Climate Innovation) Technical Advisory on Evaluating Transportation Impacts for CEQA, were finalized and made effective (OPR 2018). CEQA Guidelines Section 15064.3, and the associated Technical Advisory, provide that use of automobile VMT is the preferred CEQA transportation metric, and correspondingly eliminate auto delay/level of service as the metric for assessing significant transportation impacts under CEQA. Statewide application of the new VMT metric was required beginning on July 1, 2020.

California Department of Transportation

The California Department of Transportation (Caltrans) has jurisdiction over the State Highway System and is divided into 12 districts. The project site is within Caltrans District 11, which serves San Diego and Imperial counties. Because the project is located in an urbanized area with roadway connections and

circulation patterns that may interface with nearby state transportation facilities, Caltrans guidance provides relevant context for evaluating potential transportation effects associated with improvements affecting or occurring near state highways.

Caltrans' Intersection Safety and Operational Assessment Process provides the framework used by Caltrans to evaluate proposed traffic control and design geometrics for intersections and other access improvements on the State Highway System. In addition, Caltrans' Local Development Review Safety Review Practitioner's Guidance and Vehicle Miles Traveled-Focused Transportation Impact Study Guide provide guidance for evaluating transportation safety and land use project effects on state facilities. For CEQA transportation analysis under Senate Bill 743, Caltrans also provides the Transportation Analysis Framework and Transportation Analysis under CEQA, updated in September 2025, to support evaluation of transportation impacts on the State Highway System. Where projects affect state transportation infrastructure or require modifications associated with freeway or controlled-access facilities, Caltrans also uses freeway agreements and related procedures to document responsibility for circulation features and associated improvements.

City College is also bordered by Caltrans rights-of-way (ROWs) associated with SR 163 and I-5. Work performed within a Caltrans ROW requires discretionary review and approval by Caltrans to issue an encroachment permit prior to construction. Traffic control measures implemented for work within a Caltrans ROW must also comply with Caltrans' design manual and standard specifications.

California State University Transportation Impact Study Manual

The California State University (CSU) Transportation Impact Study (TIS) Manual was adopted in March 2019 to provide guidance in the preparation of transportation impact assessments for projects on CSU campuses, including all lands owned by CSU, consistent with the CEQA Guidelines update adopting VMT as the proper metric for assessing impacts associated with vehicular travel (CSU 2019). The TIS Manual provides guidance to be used for projects ranging from campus master plan updates to individual campus projects, and for public-private development. As neither the OPR Technical Advisory nor the City provide detailed procedures for analyzing VMT for colleges or universities, the CSU TIS Manual is used as a technical framework for the VMT analysis prepared for the project.

3.15.2.3 Regional

San Diego Association of Governments Regional Plan

The San Diego Association of Governments (SANDAG) serves as the region's metropolitan planning organization and forum for decision-making on regional issues such as growth, transportation, land use, the economy, and the environment. The Regional Plan, updated every five years by SANDAG, incorporates state requirements for a Regional Comprehensive Plan, Regional Transportation Plan (RTP), and Sustainable Communities Strategy (SCS). The 2025 Regional Plan continues the land use strategy of focusing future growth within the existing urbanized areas of the region, particularly in the western portion of the County along major transit corridors, to support transit use, walking, and bicycling. The 2025 Regional Plan focuses on reducing greenhouse gas (GHG) emissions through a combination of land use planning, expanded transit infrastructure, active transportation networks, and the implementation of transportation demand management strategies, including roadway pricing.

The 2025 Regional Plan includes a long-range planning horizon to approximately 2050 and identifies a comprehensive set of transportation improvements and policies intended to accommodate projected

regional growth while supporting state climate and sustainability goals. Some of the 2025 Regional Plan mobility projects planned the vicinity of campus include rapid bus route projects such as the Freeway Rapid Route 640 along Park Boulevard, B Street, and Russ Boulevard to I-5; Arterial Rapid Route 215, which would connect San Diego State University to downtown along Park Boulevard; and Freeway Rapid Route 290, which would connect downtown to the Rancho Bernardo Transit Station and pass by North Campus along the SR 163 northbound on-ramp.

3.15.2.4 District

District Design Guidelines and Standards Manual

Design Guides and Standards

The District Design Guidelines and Standards Manual includes Section 2.1.11, which addresses accessibility planning requirements applicable to campus development. These guidelines require site-specific ADA plans that identify accessible routes, parking areas, curb ramps, building entrances, and other key features that support pedestrian circulation and access throughout campus facilities. These standards provide a framework for maintaining and improving accessibility as part of future development.

3.15.2.5 Local (Non-Regulatory)

While the District is not subject to local zoning or land use planning regulations, the campus is located adjacent to the public street network under the jurisdiction of the City. Future development under the FMP could include modifications to access, circulation, or other features within the public ROW. Some City transportation plans and policies therefore provide relevant context for evaluating potential transportation impacts, particularly with respect to circulation, multimodal mobility, and coordination with existing and planned transportation improvements.

City of San Diego General Plan

The City's General Plan establishes policies to develop a balanced, multimodal transportation system that supports walking, bicycling, transit, and vehicular travel. The Mobility Element emphasizes complete streets principles, prioritizes transit and active transportation infrastructure, and seeks to reduce dependence on single-occupancy vehicles. The General Plan promotes the integration of land use and transportation planning to improve accessibility and mobility throughout the City, including within the downtown area.

Downtown Community Plan

The Downtown Community Plan guides land use and circulation within downtown San Diego, including circulation features adjacent to campus. The Downtown Community Plan provides more specific circulation plans and features that support the Citywide goals of the General Plan. The plan promotes a compact, high-density, mixed-use urban environment supported by a multimodal transportation system that prioritizes transit, pedestrian, and bicycle travel. The downtown area is identified as a transit-oriented district with extensive access to regional and local transit services; therefore, the Downtown Community Plan emphasizes improvements to walking and bicycling infrastructure to enhance connectivity and reduce reliance on single-occupancy vehicles. As noted in Section 3.15.1, the

Downtown Community Plan identifies planned roadway classifications with associated bicycle improvements for the downtown circulation network.

City of San Diego Transportation Study Manual

The City's Transportation Study Manual (TSM) provides guidance for evaluating transportation impacts for projects within the City's jurisdiction in accordance with SB 743. The TSM establishes VMT as the primary performance metric for assessing transportation impacts under CEQA and outlines screening criteria, thresholds of significance, and methodologies for VMT analysis; however, as noted above, detailed procedures for analysis of community college land uses are not provided. The TSM also provides the criteria for preparation of a Local Mobility Analysis to evaluate site access, circulation effects outside of the scope of CEQA, and potential effects on the surrounding multimodal transportation network, including pedestrian, bicycle, and transit facilities.

3.15.3 Thresholds of Significance

Thresholds used to evaluate potential transportation impacts are based on CEQA Guidelines Appendix G. A significant transportation impact could occur if implementation of the proposed project would:

1. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);

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

4. Result in inadequate emergency access.

3.15.4 Impact Analysis

3.15.4.1 Circulation Programs, Plans, Ordinances, and Policies

Threshold 1: Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact Discussion

Program-Level

The project site is located within downtown San Diego, where the surrounding circulation system is highly developed and includes existing and planned multimodal transportation facilities, including pedestrian infrastructure, bicycle facilities, and transit services. The project vicinity is served by a well-connected network of streets and multimodal facilities that support access to and from the campus.

Implementation of the FMP could result in modifications to campus access points, internal circulation, pedestrian connections, or connections to the surrounding street network. In particular, future projects could require improvements within or adjacent to the public ROW, such as driveway reconfiguration, sidewalk improvements, or other frontage modifications. Specific pedestrian enhancements proposed in

the FMP include a raised and widened crosswalk across B Street at its intersection with Park Boulevard and pedestrian bridges over Park Boulevard and B Street.

Potential conflicts with a circulation program, plan, ordinance, or policy could occur if future development under the FMP were to physically conflict with existing or planned transportation improvements, such as designated bicycle lanes, pedestrian pathways, transit facilities, or other planned modifications within the public ROW. The specific pedestrian enhancements identified in the FMP would not result in conflicts with existing City plans for these roadways but would enhance pedestrian connectivity across roadways through campus.

Implementation of individual projects that propose work within or affecting the public ROW would be subject to review and approval by the City and thereby required to adhere to applicable City policies. If off-site work is proposed to encroach into the Caltrans ROW adjacent to campus, an Encroachment Permit would also be required to be obtained from Caltrans. Through these processes, project design would be required to coordinate with existing and planned transportation infrastructure to avoid or minimize conflicts with adopted plans and facilities. Additionally, future development would be required to maintain safe and adequate access for all modes of travel, including pedestrians, bicyclists, transit users, emergency vehicles, as well as accessible routes consistent with ADA requirements. As a result, potential conflicts with the City's transportation system would be addressed during project-level design and permitting if they would encroach into the City ROW.

Individual buildings proposed in the FMP would be designed to adhere to the District Design Guidelines and Standards Manual, including Section 2.1.11 related to providing necessary ADA access. Entrances to these future buildings would be coordinated with the existing campus network of pedestrian pathways. Therefore, implementation of the FMP would not result in conflicts with adopted circulation programs, plans, ordinances, or policies.

Project-Level

As is the case for all projects under the FMP, implementation of near-term projects could require improvements within or adjacent to the public ROW, such as driveway reconfiguration, sidewalk improvements, or other frontage modifications. These minor adjustments along the project frontages would not conflict with existing or planned circulation improvements in the project vicinity and no specific alterations to the surrounding City circulation network are proposed. Frontage or utility connection work within or affecting the public ROW would be subject to review and approval by the City. Through this process, the District would ensure the project designs affecting the City ROW are consistent with existing and planned transportation infrastructure. Based on compliance with regulatory requirements, the near-term projects would not result in conflicts with adopted circulation programs, plans, ordinances, or policies.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.15.4.2 Vehicle Miles Traveled

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Discussion

Program-Level

The District, as the CEQA lead agency, has decided to analyze potential impacts associated with VMT based on the CSU TIS Manual because it is consistent with the CEQA Guidelines and OPR's Technical Advisory and provides comprehensive and relevant guidance for higher education land use types not otherwise available in City or OPR documents. While these guidelines were developed for projects on CSU campuses, they are considered applicable to this analysis due to the similar land use characteristics, commuter patterns, and travel behavior associated with public higher-education campuses.

Per the CSU TIS Manual, the following project types are not required to complete a full VMT assessment and impacts under CEQA can be presumed to be less than significant. That is, VMT impacts associated with projects falling within one of the following categories would have a less than significant impact on VMT:

- Local serving retail that is less than 50,000 square feet, or retail that is located wholly within the core of a CSU campus;
- Childcare centers that serve students, faculty, and staff families;
- Student services facilities;
- Parking facilities that serve the campus demand and do not create "too much parking";
- Healthcare centers serving students, faculty, and staff;
- Recreation/fitness/wellness centers that serve students, faculty, and staff; and
- Projects generating less than 110 vehicle trips per day, as noted in the OPR Technical Advisory.

Further, the CSU TIS Manual describes that, in addition to the project types identified above, screening from a project-level assessment may be appropriate for other types of projects because certain characteristics (e.g. location) affect VMT such that it can be assumed those project types would not result in significant VMT impacts. Specifically, the following project types and screening attributes have the potential to decrease the number of trips and/or the trip length around their development, further decreasing VMT:

- **Development in Transit Priority Areas (TPAs).** TPAs are defined as areas within a one-half mile of either an existing major transit stop (defined as a rail transit stop, ferry terminal served by either bus or rail transit, or the intersection of two or more major bus routes with 15-minute or better headways during the peak commute periods) or a stop along an existing high quality transit corridor (defined as a fixed route bus service with headways of 15-minutes or better).

- **Development in a low-VMT generating area of the city, sub-region, or region.** Low-VMT generating areas of the city, sub-region, or region can be identified by a transportation

consultant by reviewing the VMT per person for the traffic analysis zone (TAZ) for the referenced region. If the proposed land use is consistent with what is currently in the study area and the TAZ is identified as generating less than the applicable regional or subregional VMT per capita average, then the project can be screened from project level assessment.

- **On-campus housing serving students, faculty, and staff.**

The City College campus is located within a TPA since it is within one-half mile of the City College Transit Station, which is a major transit stop as defined by the CSU TIS Manual because it provides at least 15-minute headways via trolley service and multiple bus routes. Therefore, campus development would continue to occur within a TPA and is appropriately screened from a project level assessment of VMT impacts.

Project-Level

As is the case for all projects under the FMP, the near-term projects would also be located within a TPA. The near-term projects would therefore also be screened from a project level assessment of VMT impacts.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in a conflict or inconsistency with CEQA Guidelines Section 15064.3 (b). **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.15.4.3 Hazardous Design Feature

Threshold 3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Discussion

Program-Level

The FMP would include crosswalk alterations, curb bulbouts, fire lane enhancements, and pedestrian bridges across roadways. However, the proposed improvements would occur within the campus and along existing adjacent roadways to connect already developed areas. Adjusted driveways could be constructed near existing campus access points where new or altered parking facilities are proposed but these minor frontage adjustments would not encroach into the public ROW such that new hazards would be created. If these entrance alterations would result in changes within the City ROW, they would be designed and approved in coordination with the City to ensure the proposed reconfiguration adheres to City roadway design standards. No change from higher educational land uses is proposed and the project would not introduce incompatible land uses to the existing campus. Therefore, implementation of the FMP would not result in substantial increases in hazards due to a geometric design feature or incompatible uses.

Project-Level

Implementation of the near-term projects would similarly occur within the developed campus. No change from higher educational land uses is proposed and the project would not introduce incompatible uses to the existing campus. The near-term projects also do not involve new parking facilities or other improvements that would substantially alter existing circulation patterns. Therefore, implementation of the proposed near-term projects would not result in substantial increases in hazards due to a geometric design feature or incompatible uses.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not result in substantial increases in hazards due to a geometric design feature or incompatible uses. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.15.4.4 Emergency Access

Threshold 4: Would the project result in inadequate emergency access?

Impact Discussion

Program-Level

As future FMP projects would be constructed within the campus boundaries, these projects are not anticipated to substantially impair emergency access to or from the campus. Staging of construction equipment and materials is also anticipated to occur within campus boundaries. Roadways adjacent to the campus, including I-5, 11th Avenue, and Ash Street, would remain available for emergency evacuation (refer to Section 3.8, *Hazards and Hazardous Materials*, for additional discussion of evacuation routes). Long-term implementation of the FMP would result in minor frontage adjustments along some of these roadways that border campus; however, such changes would be limited to pedestrian enhancements and driveway/curb adjustments that would not restrict emergency vehicle access. Future FMP projects would also be required to provide or maintain adequate emergency access in accordance with building code requirements, including those that address fire truck lanes, hose pull distances, and security systems.

During construction activities, however, there is potential for staging or construction to result in temporary changes to roadway configurations and access. For construction that would occur within the City ROW, such as for pedestrian alterations within City streets, the District would be required to obtain and comply with the condition of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan to ensure emergency access is maintained on City streets. During construction occurring outside of City ROWs and within District property, construction-related road closures or construction areas could interfere with emergency access within the campus. The District would maintain emergency access by clearly delineating the limits of construction work and providing signage where temporary circulation changes are required; however, these procedures are not mandated by law. Therefore, during construction, future FMP projects could temporarily impair emergency access during construction.

Project-Level

The near-term projects proposed under the FMP would not cause changes to City roadways that would result in inadequate emergency access. These projects would also be required to provide or maintain emergency access in accordance with state building codes. However, construction of the near-term projects could result in temporary changes to emergency access within campus and on adjacent City roadways. While temporary work affecting City streets would be subject to a Traffic Control Plan prepared to maintain emergency access, the preparation of a similar plan for on-campus circulation is not mandated by existing policies. Therefore, on-campus construction could temporarily impair emergency access.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, could interfere with emergency access to campus through construction-period road closures on campus. **Program-level and project-level impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

TRA-1 On-Campus Construction Traffic Management Plan. In the event that the construction of a project requires a fire lane or roadway closure on campus or otherwise affects campus circulation, the contractor and/or Project Manager shall provide notification of this closure to the District Police Department; representatives responsible for Emergency Response Plan implementation; and campus community at large prior to construction. During construction, the District shall maintain continuous vehicular and pedestrian access across campus. If road closures would affect emergency routes, alternative routes shall be identified and directional signage shall be provided. If determined necessary by the District Police Department, the San Diego Fire-Rescue Department (SDFD) shall also be notified. Appropriate signage and closure procedures shall be guided by the California Manual on Uniform Traffic Control Devices.

Project-Level

Mitigation measure TRA-1 would apply to each of the near-term projects.

Level of Significance After Mitigation

Implementation of mitigation measure TRA-1 would reduce program-level and project-level impacts related to construction-period emergency access to a level that is **less than significant**.

3.15.5 Cumulative Impact Analysis

The study area for cumulative impacts related to circulation programs, plans, ordinances, and policies corresponds to the geographic extent of those documents, which generally encompasses the City. The study area for cumulative VMT impacts is also regional in nature and corresponds to the City. The study area for hazardous design features is local, focused on roadways adjacent to the campus, while the study area for emergency access is the City, reflecting the broader network of routes used by emergency responders.

3.15.5.1 Circulation Programs, Plans, Ordinances, and Policies

Cumulative development projects within the San Diego region would be required to demonstrate compliance with applicable circulation programs, plans, ordinances, and policies for the purpose of avoiding or mitigating environmental effects. Projects that are not consistent with these documents would require discretionary approvals, such as permits or plan amendments, and require environmental review under CEQA, through which conflicts and cumulative effects on the circulation network would be evaluated. However, as the project would not conflict with circulation programs, plans, ordinances, policies, the FMP contribution to such impacts **would not be cumulatively considerable**.

3.15.5.2 Vehicle Miles Traveled

The CSU TIS Manual states that for projects screened from project-level VMT assessment, consistency with the applicable RTP must be demonstrated; otherwise, a cumulative level VMT assessment would be required to determine the project's effect on regional VMT. The current RTP for the San Diego region is the 2025 Regional Plan, which utilizes the SANDAG Series 15 Activity Based Model 3 Regional Plan for regional travel demand forecasting. Within this model, the project site is located within TAZ 2066. The RTP travel demand forecasting model assumes the continued development of the City College campus with community college land uses through 2050, consistent with the FMP. Therefore, implementation of the FMP is consistent with the RTP land use assumptions for the project area and a more detailed cumulative VMT assessment is not required.

Cumulative development projects in the City would be required to comply with the City's Mobility Choices Ordinance (San Diego Municipal Code Section 143.1103 et seq.) and may require a VMT analysis in accordance with the City TSM. Projects that result in a significant VMT impact would be required to implement active transportation measures or pay the City's Active Transportation In Lieu Fee. Nonetheless, future projects in the City, especially those constructed in non-VMT-efficient areas, could result in a substantial increase in regional VMT and result in significant cumulative impacts. As the project site is in a TPA and VMT-efficient area, it is presumed to have a less than significant VMT impact and the FMP contribution to cumulative VMT impacts **would not be cumulatively considerable**.

3.15.5.3 Hazardous Design Feature

Construction of future cumulative development projects in the City could result in the construction of hazardous design features; however, no cumulative projects are reasonably anticipated to result in permanent changes to nearby roadways or areas near the campus. These projects would also be reviewed for compliance with City regulations related to roadways and adjacent land uses, which is anticipated to be sufficient to avoid substantial conflicts or hazards. In addition, implementation of the FMP, including near-term projects, would not include features that would create a hazardous condition. Therefore, cumulative impacts related to hazardous design features would be **less than significant**.

3.15.5.4 Emergency Access

Construction of future cumulative development projects in the City could result in interference with emergency access during temporary construction activities that block access routes. Once operational, such projects would also be required to provide permanent, adequate emergency access in accordance with state building codes. No cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that existing emergency access would be eliminated. Development within the City College campus would not physically interfere with emergency access

because the FMP, including the near-term projects, would not include features that prevent continued emergency access. In addition, the projects implemented under the FMP would be required to establish and maintain emergency access on campus during construction in accordance with mitigation measure TRA-1 or in compliance with a City Public Right-of-Way permit to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency access would be **less than significant**.

3.16 Tribal Cultural Resources

This section addresses the potential tribal cultural resources impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to tribal cultural resources are also addressed. This section relies on the information and analysis in the Archaeological Technical Report (HELIX 2026), provided as Appendix D to the PEIR.

3.16.1 Environmental Setting

3.16.1.1 Terminology

A tribal cultural resource is defined as 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 may be considered significant if it is (1) listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources; or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code (PRC) Section 5024.1(c). Refer to Section 3.4, *Cultural Resources*, for further discussion regarding the existing cultural and historical setting of the project area, including a summary of the history of the Kumeyaay people.

3.16.1.2 Tribal Cultural Resources

The environmental setting as it relates to cultural resources is described in detail in Section 3.4, *Cultural Resources*, including discussion of the prehistorical and ethnohistorical context that applies to tribal cultural resources (Sections 3.4.1.1, and 3.4.1.2, respectively) and the methods for identifying cultural and tribal cultural resources (Section 3.4.1.5). The presence and significance of existing tribal cultural resources within the project site were evaluated based on a review of institutional records and previous studies within the project site, a records search conducted at the South Coastal Information Center (SCIC), a Sacred Lands File Search, Native American outreach and consultation, and a pedestrian survey that involved Native American monitors. As described further in Section 3.4.1.5, a pedestrian survey of areas of open ground on the project site was conducted on February 27, 2025, by HELIX staff archaeologist James Turner, with Kumeyaay Native American monitor Javier Dominguez from Red Tail Monitoring and Research. No tribal cultural resources were observed during the field survey. The evaluation of tribal cultural resources is in conformance with PRC Section 21082.3, the CEQA Guidelines, and statutory requirements of CEQA (Section 15064.5). To date, no tribal cultural resources have been formally identified within the project site that currently serve religious or other community practices.

3.16.1.3 Native American Contact Program

HELIX contacted the Native American Heritage Commission (NAHC) on February 18, 2025, for a Sacred Lands File search and list of Native American contacts for the project area. The NAHC indicated in a response dated March 4, 2025, that the results of the search were positive, and to contact the Kumeyaay Cultural Repatriation Committee for more information. Informal outreach letters were sent to Native American representatives and interested parties identified by the NAHC on March 25, 2025. No responses have been received to date.

3.16.1.4 Assembly Bill 52 Consultation

Pursuant to PRC Section 21083.3.1, the District initiated consultation pursuant to Assembly Bill (AB) 52 for the proposed projects being conducted for all four campuses: Mesa College, City College, Miramar College, and San Diego College of Continuing Education. Letters were mailed on December 12, 2025, to the following Native American Tribes that were identified by the NAHC as part of the contact program described above:

- Barona Group of the Capitan Grande
- Campo Band of Diegueño Mission Indians
- Ewiiaapaayp Band of Kumeyaay Indians
- Iipay Nation of Santa Ysabel
- Inaja-Cosmit Band of Indians
- Jamul Indian Village
- La Posta Band of Diegueño Mission Indians
- Manzanita Band of Kumeyaay Nation
- Mesa Grande Band of Diegueño Mission Indians
- Pauma Band of Luiseño Indians
- San Pasqual Band of Diegueño Mission Indians
- Sycuan Band of the Kumeyaay Nation
- Viejas Band of Kumeyaay Indians

The letters described the scope, location (including aerial and topographical maps), and nature of the long-range campus planning efforts and near-term improvements for each proposed project, and informed the Tribe of its opportunity to request government-to-government consultation.

The District is undertaking consultation under AB 52 with the three tribes who replied affirmatively to request consultation: Campo Band of Mission Indians (Campo), Jamul Indian Village (Jamul), and Viejas Band of Kumeyaay Indians (Viejas). Information resulting from these consultations has been used to help assess project impacts.

Campo Band of Mission Indians

On January 15, 2026, the Campo Cultural Resource Manager submitted a written response to the District requesting government-to-government consultation pursuant to AB 52. In its response, Campo requested additional information related to proposed mitigation measures, the presence of adjacent sites, and the types of ground-disturbing activities associated with the District projects. Campo indicated its interest in engaging in consultation to further discuss these topics and to address potential impacts to tribal cultural resources. The District has followed up with the Tribe to conduct consultation and provided draft Archaeological Resources Technical Reports; however, no further correspondence from the Tribe has been received and no consultation meetings were scheduled.

Jamul Indian Village

On January 15, 2026, the Jamul Tribal Historic Preservation Officer and Cultural Resource Director submitted a written response to the District requesting government-to-government consultation pursuant to AB 52. In its response, Jamul expressed its request to consult on the proposed projects and identified its designated Tribal contact for further coordination. Draft Archaeological Resources

Technical Reports were provided to the Tribe for review. A virtual Tribal consultation meeting was conducted on April 29, 2026, with representatives from the District, Jamul, and HELIX, the District's consultant. The Tribe was provided a summary overview of the proposed projects, cultural resources study methodology, and anticipated schedule for public review of the environmental documents for each campus. No conflicts with the findings of the Draft Archaeological Resources Technical Reports were identified by Jamul during this meeting. The District contacted the Jamul representative on June 24, 2026, to confirm no further comments or concerns remained, and consultation was concluded on July 24, 2026, as no further response was received.

Viejas Band of Kumeyaay Indians

On December 15, 2025, Viejas responded to the AB 52 consultation request, stating that they had reviewed the proposed projects and indicated that the project sites have cultural significance or ties to the Viejas Band. Viejas stated that cultural resources have been identified within or adjacent to the area of potential effects for projects involving ground-disturbing activities in undisturbed soils. Viejas requested that a Kumeyaay Cultural Monitor be present during ground-disturbing activities and that the Tribe be notified of any inadvertent discoveries, including cultural materials, cremation sites, or human remains.

For projects occurring within previously disturbed areas, Viejas noted that the project sites may contain sacred locations and requested that such areas be avoided where feasible and protected with appropriate buffer zones. Viejas further requested compliance with applicable federal and state laws related to cultural and tribal resources, including CEQA, the National Environmental Policy Act (NEPA), the Native American Graves Protection and Repatriation Act, and California Native American Graves Protection and Repatriation Act, and requested immediate notification of changes to the projects or inadvertent discoveries. Viejas provided contact information for coordination related to monitoring and consultation. No request for further government-to-government consultation pursuant to AB 52 was provided.

3.16.2 Regulatory Framework

A summary of federal and state regulations that pertain to tribal cultural resources is provided below. No regional, District, or local regulations regarding tribal cultural resources apply to the project.

3.16.2.1 Federal

See Section 3.4, *Cultural Resources*, for a discussion of federal cultural resources regulations. Cultural resources listed in the National Register of Historic Places (NRHP) may also be considered tribal cultural resources.

3.16.2.2 State

See Section 3.4, *Cultural Resources*, for a discussion of additional state cultural resources regulations. Cultural resources listed in the CRHR may also be considered tribal cultural resources.

Native American Heritage Values

AB 52 revised the CEQA Guidelines to include tribal cultural resources as an area of environmental impact analysis under CEQA. As a general concept, a tribal cultural resource is similar to the federally

defined term Traditional Cultural Properties; however, it incorporates consideration of local and state significance and requires mitigation under CEQA. “Traditional” in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. The traditional cultural significance of a historic property, then, is derived from the role the property plays in a community's historically rooted beliefs, customs, and practices.

Per PRC Section 21080.3, a CEQA lead agency must consult with any California Native American tribe that requests consultation and that is traditionally and culturally affiliated with the geographic area of a proposed project to identify resources of cultural or spiritual value to the tribe, even if such resources are already eligible as historical resources as a result of cultural resources studies. A tribal cultural resource may be considered significant if it is (i) included in a local or state register of historical resources; (ii) determined by the lead agency to be significant pursuant to criteria set forth in PRC Section 5024.1; (iii) a geographically defined cultural landscape that meets one or more of these criteria; (iv) a historical resource described in PRC Section 21084.1 or a unique archaeological resource described in PRC Section 21083.2; or (v) a non-unique archaeological resource if it conforms with the above criteria.

3.16.3 Thresholds of Significance

Thresholds used to evaluate potential tribal cultural resources impacts are based on CEQA Guidelines Appendix G. A significant tribal cultural resources impact could occur if implementation of the proposed project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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:

    a. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or

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

3.16.4 Impact Analysis

3.16.4.1 Tribal Cultural Resources

Threshold 1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 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: (a) listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k) or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1? In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact Discussion

Program-Level

Ground-disturbing activities associated with implementation of the FMP have the potential to affect tribal cultural resources, including archaeological sites, traditional gathering areas, or other areas of traditional use. While there are no known tribal cultural resources within the project site, the Sacred Lands File search conducted by the NAHC was returned with positive results, indicating that sacred lands or Native American cultural resources may be present in the project area. Per AB 52, the District initiated consultation with California Native American tribes that are traditionally and culturally affiliated with the project area to identify resources of cultural value to the tribe(s). As described in Section 3.16.1.4, representatives of the Campo Band of Mission Indians and Jamul Indian Village of California requested to undertake consultation and be provided additional information about the project in response to consultation invitations sent on December 12, 2025. Both tribes were provided with the project Archaeological Technical Report. No further consultation meetings with Campo occurred while consultation with Jamul was concluded on July 24, 2026, following an earlier consultation meeting with the Tribe. The Viejas Band of Kumeyaay Indians also responded, indicating the presence of tribal cultural resources in the project area and requesting a Kumeyaay monitor be on-site during ground disturbing activities.

Consistent with the analysis of sensitivity for potential unrecorded archaeological resources, tribal cultural resources are anticipated to have the potential to occur where subsurface deposits are present below older buildings, as indicated by the moderate sensitivity areas shown on Figure 3.4-1. Areas of campus that have been extensively graded or disturbed by the construction of new improvements in the last 50 years have been categorized as low sensitivity and are not anticipated to contain tribal cultural resources. Therefore, it is anticipated that ground-disturbing activities in moderate sensitivity areas associated with the implementation of the FMP could have the potential to cause a substantial adverse change in the significance of a tribal cultural resource pursuant to PRC Section 21074.

In addition, due to the low to moderate cultural resources sensitivity of the project site and the lack of prehistoric archaeological resources previously recorded within the surrounding 0.5-mile vicinity, it is considered unlikely for human burials to have occurred within campus. However, while low, the potential nonetheless exists for unknown burials to be present, and ground-disturbing activities

associated with the implementation of future projects could have the potential to disturb human remains associated with local Native American tribes.

Project-Level

Building A Expansion

The Building A Expansion project would occur within low and moderate sensitivity areas (Figure 3.4-1) for archaeological resources, with the moderate sensitivity area underlying existing Building D that would be demolished. Therefore, ground-disturbing activities associated with this project have the potential to cause an adverse change in the significance of tribal cultural resources, including human remains.

Performing Arts Center

The Performing Arts Center project would be constructed in a low sensitivity area (Figure 3.4-1) for archaeological resources. As such, this near-term project, requiring ground disturbance only in a low sensitivity area, is not anticipated to cause a substantial adverse change in the significance of a tribal cultural resource. However, as described in the program-level analysis above, the limited potential exists for unknown burials to be present, and ground-disturbing activities associated with the implementation of this project could disturb human remains of Native American origin.

North Campus Athletic Fields

Portions of the North Campus Fields project affecting the softball and soccer fields would occur in moderate sensitivity areas (Figure 3.4-1) for archaeological resources, with improvements to the upper parking and tennis areas occurring in low sensitivity areas. Therefore, ground-disturbing activities have the potential to cause an adverse change in the significance of tribal cultural resources which may be present on or below the ground surface in areas with a moderate sensitivity. In addition, the potential exists for unknown burials to be present, and the project's ground-disturbing activities could disturb human remains of Native American origin.

Level of Significance Prior to Mitigation

Program-Level

Implementation of the FMP has the potential to cause a substantial adverse change in the significance of tribal cultural resources due to ground disturbing activities. **Program-level impacts would be significant prior to mitigation**.

Project-Level

Building A Expansion

The Building A Expansion project's ground disturbing activities in moderate sensitivity areas have the potential to cause a substantial adverse change in the significance of tribal cultural resources, including human remains. **Building A Expansion project impacts would be significant prior to mitigation**.

Performing Arts Center

The Performing Arts Center project's ground disturbing activities in low sensitivity area do not have the potential to cause a substantial adverse change in the significance of tribal cultural resources, except for the limited potential to unintentionally disturb human remains. **Performing Arts Center project impacts would be significant prior to mitigation**.

North Campus Athletic Fields

The North Campus Athletic Fields project's ground disturbing activities in moderate sensitivity area have the potential cause a substantial adverse change in the significance of tribal cultural resources, including human remains. **North Campus Athletic Fields project impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

Mitigation measures CUL-5 (in moderate sensitivity areas) and CUL-6 (refer to Section 3.4, *Cultural Resources*) would apply to the projects proposed under the FMP.

Project-Level

Building A Expansion

Mitigation measure CUL-5 would apply to construction of the near-term Building A Expansion project occurring in moderate sensitivity areas, while mitigation measure CUL-6 would apply for all construction activity involving ground disturbance.

Performing Arts Center

Mitigation measure CUL-6 would apply to ground disturbing activities for the Performing Arts Center project.

North Campus Athletic Fields

Mitigation measure CUL-5 would apply to construction of the near-term North Campus Athletic Fields project occurring in moderate sensitivity areas, while mitigation measure CUL-6 would apply for all construction activity involving ground disturbance.

Level of Significance After Mitigation

Implementation of mitigation measures CUL-5 and CUL-6 would reduce program-level and project-level impacts to tribal cultural resources to a level that is **less than significant**.

3.16.5 Cumulative Impact Analysis

The geographic area for the analysis of cumulative impacts related to tribal cultural resources is San Diego County (County) as cumulative projects throughout the County have the potential to result in the substantial loss of tribal cultural resources reflecting the history of the Kumeyaay people through development activities.

Cumulative projects could involve ground disturbing activities which have the potential to disturb or destroy tribal cultural resources. These projects would be regulated by applicable federal, state, and local regulations; however, even with regulatory compliance, the loss of tribal cultural resources on a regional level may not be adequately avoided or mitigated through the methods specified in these regulations. Therefore, cumulative impacts related to tribal cultural resource loss would be significant. However, for projects proposed under the FMP, the implementation of mitigation measures CUL-5 and CUL-6 would reduce impacts to tribal cultural resources to a less than significant level. Therefore, the project's contribution to the cumulative impact **would not be cumulatively considerable**.

3.17 Utilities and Service Systems

This section addresses the potential utilities and service systems impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to utilities and service systems are also addressed. Some environmental topics addressed in this section are further examined in other sections of this PEIR, including Section 3.5, *Energy*, and Section 3.9, *Hydrology and Water Quality*.

3.17.1 Environmental Setting

3.17.1.1 Water

The City of San Diego (City) Public Utilities Department (PUD) is the water supply agency for City College. The PUD and other local retail water distributors formed the San Diego County Water Authority (SDCWA) for the purpose of purchasing Colorado River water from the Metropolitan Water District of Southern California (MWD), a large wholesale water provider.

Metropolitan Water District

The MWD is Southern California's wholesale water provider. The MWD service area is approximately 5,200 square miles and includes the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura. There are 26 member agencies of the MWD, including 14 cities and 11 municipal water districts. MWD owns and operates the Colorado River Aqueduct, and the Colorado River is one of their two main water sources. Under the priority system that governs the distribution of Colorado River water made available to California, MWD holds the fourth-priority right to 550,000 acre-feet per year (AFY; SDCWA 2026a).

MWD's second major water source is the State Water Project, owned by the State of California and operated by the Department of Water Resources (DWR). The State Water Project's supply originates in Northern California with water captured from the Feather River Watershed behind Lake Oroville Dam. MWD's contract with DWR provides for the ultimate delivery of 1,912,000 AFY, which is 46 percent of the total State Water Project entitlement (SDCWA 2026a).

MWD's existing water supplies have been historically sufficient to meet demands within its service area during years of normal precipitation, and while it manages reserve supplies to account for normal drought conditions, regulatory actions have placed limitations on its ability to provide water to its member agencies. In 2022, MWD requested and received delivery of human health and safety water supplies from DWR to partially meet the demands of member agencies in the northern portion of its service area. MWD's 2025 Urban Water Management Plan (UWMP) concludes that MWD has sufficient supply capabilities to meet expected demands under the single driest year and the multiple-dry year scenarios through 2050 (SDCWA 2026a).

San Diego County Water Authority

The SDCWA is one of the member agencies of MWD. SDCWA is the countywide wholesaler and is made up of 22 public member agencies across the San Diego region (SDCWA 2026b). SDCWA owns and operates five large-diameter pipelines to deliver imported water to its member agencies. SDCWA has embarked on a multi-year Emergency Storage Project, which is a system of reservoirs, pipelines, pump

stations, and other conveyance facilities intended to improve San Diego County's (County's) water storage capacity, and to allow stored emergency water to be delivered to SDCWA's member agencies during a prolonged regional interruption. The SDCWA Emergency Water Project facilities could be used to help deliver emergency water supply to member agencies during two- and six-month emergency events in which the County may not be able to receive regular imported water deliveries from MWD due to an event that renders their transmission system inoperable (SDCWA 2026a).

SDCWA's 2025 UWMP includes a summary of the total projected water supplies and demands within SDCWA's service area over 20 years (2030-2050) in five-year increments under normal, single dry, and multiple dry water years. SDCWA's reliability assessment demonstrates that with conservative assumptions regarding the availability of dry year supplies from MWD, the San Diego region's existing and projected water resource mix is increasingly drought-resilient and there would be no shortages anticipated in normal year, drought year, or multiple dry year projections in the service area (SDCWA 2026a).

City of San Diego Public Utilities Department

The PUD is one of the public member agencies of the SDCWA and provides drinking water to 1.4 million individuals, which is expected to increase by 4 percent over the next 25 years. The PUD's water system extends over 404 square miles and includes both potable and recycled water facilities. The City's water system has nine reservoirs, two water reclamation plants, three water treatment plants, 29 treated water storage facilities, and 3,700 miles of pipelines. In addition, PUD maintains and operates 49 water pump stations that deliver treated water from the water treatment plants to more than 321,000 metered service connections in 127 different pressure zones. PUD also maintains several emergency connections to and from neighboring water agencies, including the Santa Fe Irrigation District, City of Poway, and Olivenhain Municipal Water District (City 2026a).

The City's water system is split into three major service areas: Miramar, Alvarado, and Otay. The City College campus lies within the Alvarado service area. The Alvarado Water Treatment Plant was originally constructed in 1951 and has a current capacity of 120 million gallons per day (mgd; City 2026a).

In 2025, the City met about 72 percent of its supply needs with water purchased from the SDCWA and met the remainder of its demand from the City's local reservoirs, groundwater and recycled water. By 2035, it is anticipated that 29 percent of City water supplies would be water purchased from SDCWA, while the remaining demand would be met by local surface supply, Pure Water, recycled water, the City-Lake Cuyamaca Interagency Agreement, and groundwater (City 2026a).

The City's 2025 UWMP (City 2026a) serves as the City's overarching water resources planning document to address the City's water system, water demand, water supply resources, conservation efforts, and historic and projected water use. By 2050, the City expects to provide 70 percent of its total supply from local sources, effectively reversing the current reliance on imported water. The total water demand forecast under normal year conditions is 173,510 AFY for 2030 and 178,259 AFY for 2050. No water shortages are anticipated to occur from 2030 through 2050 (City 2026a).

Surface Water

The PUD maintains and operates nine reservoirs that capture surface water runoff from rainfall within local watersheds that cover more than 900 square miles. Rainfall in areas east of the City where the City's large reservoirs are located can range from 15 to 30 inches per year. These nine local surface

water reservoirs have a combined restricted capacity of 444,774 AF with consideration of California Division of Safety of Dams regulations. The native water captured in these reservoirs has provided approximately 13 percent of the City's total supply between 2009 and 2025 (City 2026a).

The use of local surface water is affected by both availability and water resource management policies. The PUD's policy is to use local water first to reduce imported water purchases. The PUD also operates emergency and seasonal storage programs. The purpose of emergency storage is to maintain an accessible amount of stored water that could provide an uninterrupted supply of water to the City's water treatment facilities, should an interruption to the supply of imported water occur. The purpose of seasonal storage is to store surplus imported water in the wet winter season for use during the dry summer season. The PUD may also increase use of imported water, in lieu of local water, in the winter so local water may be saved in reservoirs or groundwater basins for summer use (City 2026a).

Recycled Water

While the PUD has historically imported nearly all its water from the SDCWA, it also strives for more local surface water, recycled water, and conservation efforts to meet or offset potable demands. Recycled water is wastewater that has undergone additional treatment to make it suitable for a range of beneficial uses. Recycled water has been used in the City for almost 20 years and is produced by two water reclamation plants: the North City Water Reclamation Plant and the South Bay Water Reclamation Plant. The City's recycled water is suitable for irrigation and industrial processes, including cooling water towers, construction, ornamental fountains, flushing toilets, and wetland restoration (City 2026a).

The City's Pure Water San Diego Program, approved by City Council in 2014 is intended to provide a reliable drinking water supply that is locally controlled and drought-proof. The program will use advanced water treatment processes to turn recycled water into water of equal or greater quality than the imported sources (City 2026a).

City College Campus Water Use

Existing water infrastructure that serves the City College campus is comprised of various water mains located in City streets which have connections to the campus network of water lines. Along North Campus, a 12-inch water main extends along Park Boulevard and connects to a 12-inch water main in Russ Boulevard along the southern edge of North Campus. This water main then connects to a 24-inch water main that runs along 11th Avenue and has a 6-inch lateral connection which extends into the existing parking lot that is located in the southern portion of North Campus.

South Campus is additionally served by water mains located in City streets which have lateral connections to the City College property. A 12-inch water main is located in Russ Boulevard along the northern edge of South Campus which terminates at B Street. At the intersection of Russ Boulevard and 16th Street, a 12-inch water main extends to the south along 16th Street. In addition, a 12-inch water main connects to the water main located in Russ Boulevard and extends through the City College campus between the Early Education Center (Building EEC) and the Administrative Services building (Building T). A 6-inch lateral located along this water main connects to the southwest of the Early Education Center (Building EEC). This 12-inch water main ultimately connects to a 16-inch water main located within B Street. Along the B Street water main, there is a 6-inch lateral connection to the north of the Learning Resource Center (Building R) and an 8-inch lateral connection to the northwest of the Creative Arts building (Building C). At the intersection of B Street and 17th Street, a 16-inch water main extends north along 17th Street and includes a lateral connection into Lot 3 north of Garfield High

School. The 16-inch water main in 17th Street additionally extends to the south adjacent to the Affordable Student Housing project and the Career Technology Center (Building V). A water main is located in C Street, which is 12 inches in diameter from Park Boulevard to 14th Street, 8 inches in diameter from 14th Street to 15th Street, and 12 inches in diameter from 15th Street to its termination at 17th Street. Along this main, an 8-inch lateral connection extends into the parking lot located southwest of the Saville Theatre, and an 8-inch lateral connection extends towards the southern edge of the Arts and Humanities building (Building AH).

Based on the period between October 2024 to September 2025, City College consumes approximately 15.4 million gallons per year under existing conditions.

3.17.1.2 Wastewater

The City's PUD serves a population of more than 2.2 million wastewater customers. The City's wastewater system consists of two sub-systems: the Metropolitan Sewerage System and the Municipal Sanitary Sewer System. The Metropolitan Sewerage System provides wastewater treatment and disposal services for both the City and 15 additional agencies and districts. Its service area extends from Del Mar on the north to San Ysidro on the south and from Alpine and Lakeside on the east through the City. The Municipal Sanitary Sewer System is responsible for collection and conveyance of wastewater from residences and businesses within a 342-square-mile service area. It includes approximately 2,945 miles of gravity mains, 112 miles of force mains, and 77 sewer pump stations (City 2025a).

The Metropolitan Sewerage System includes three wastewater treatment plants: (Point Loma Wastewater Treatment Plant [PLWTP], North City Water Reclamation Plant, and South Bay Water Reclamation Plant), as well as one biosolids processing facility, Metro Biosolids Center, and four large pump stations. The PLWTP has a treatment capacity of 240 mgd, the North City Water Reclamation Plant has a treatment capacity of 30 mgd, and the South Bay Water Reclamation Plant has a treatment capacity of 15 mgd (City 2025b). Currently, the average wastewater flow rate conveyed by the collection system is approximately 151.3 mgd to PLWTP, 13.5 mgd to the North City Water Reclamation Plant, and 6.2 mgd to the South Bay Water Reclamation Plant, while the Metro Biosolids Center receives and processes approximately 11,000 tons of dewatered biosolids per month (City 2025a).

City College Wastewater Infrastructure

The wastewater infrastructure which serves the City College campus is comprised of sewer mains located throughout the campus which connects to sewer mains located in the City right-of-way (ROW). Wastewater infrastructure located on North Campus includes an 8-inch sewer main which runs parallel to the eastern edge of the building located south of Building P-3 and connects to an 8-inch sewer main located in Russ Boulevard.

In South Campus, a 6-inch sewer main extends from the northwestern portion of Building D to B Street, where it expands to an 8-inch main that extends to the south through campus to the west of the Creative Arts building (Building C) and Saville Theatre. A 10-inch sewer main is located within Russ Boulevard and extends from the northwest portion of Building D to the northeastern edge of the Administrative Services building (Building T), where this sewer main then extends to the south to B Street. At B Street, the 10-inch sewer main extends to the east and connects to a 10-inch sewer main along the entirety of 16th Street through South Campus. A 10-inch sewer main is additionally located in 17th Street and extends from the southeastern edge of Lot 3 to the south through campus and is

downsized to an 8-inch sewer main at the northeastern corner of the parking garage connected to the Career Technology Center (Building V). A 6-inch sewer main extends from the northwestern corner of the Business and Technology building (Building BT) to the intersection of C Street and 15th Street, where it expands to a 10-inch sewer main and continues to the south in 15th Street. An 8-inch sewer main extends from B Street to C Street along the western side of the Learning Resource Center (Building R).

Based on water demand for the period between October 2024 to September 2025 and California Emissions Estimator Model (CalEEMod) default assumptions for indoor water use (conservatively assumed to be 100 percent wastewater), City College is estimated to produce approximately 9.4 million gallons of wastewater per year under existing conditions.

3.17.1.3 Stormwater

The City's stormwater system is maintained by the City's Stormwater Department. It consists of drainage and conveyance facilities such as underground storm drain pipes, culverts, outfalls, pump stations, open flood risk management channels, and more. This infrastructure collects and conveys stormwater and other runoff downstream. Storm drains are designed to handle normal water flow, but occasionally during heavy rain flooding will occur. The storm water conveyance system (underground conduits and street surface improvements) is designed to have the capacity to convey the peak discharge from a 100-year storm event without affecting properties located adjacent to the City ROW (City 2017). The Stormwater Department is responsible for the inspection, maintenance, and repair of the storm drain system in the public ROW and in drainage easements whereas individual property owners are responsible for maintenance of on-site stormwater features that capture site runoff. In addition, other City departments, such as the Parks and Recreation Department or PUD, may also have the responsibility and jurisdiction to maintain the drainage systems within their own facilities.

City College Stormwater Infrastructure

Stormwater on the City College campus is either absorbed into pervious areas on campus or flows along pervious areas to curbs and gutters located throughout the campus. The on-campus stormwater infrastructure ultimately connects to the curbs, gutters, and storm drains located within the City streets adjacent to the campus which are a part of the City's stormwater system as further described above.

3.17.1.4 Solid Waste

Solid waste generated throughout the City, including from City College, is primarily sent to three regional landfills: Miramar Landfill, Sycamore Landfill, and Otay Landfill. According to the Solid Waste Information System (SWIS) database maintained by the California Department of Resources Recycling and Recovery (CalRecycle), the Miramar Landfill had a remaining capacity of approximately 11,080,871 cubic yards of solid waste as of January 30, 2020. Based on the remaining capacity and disposal rates, Miramar Landfill is expected to close January 1, 2031 (CalRecycle 2025).

Two other landfills, Sycamore Landfill and Otay Landfill, provide disposal capacity within the City. The Sycamore Landfill is located to the south of Marine Corps Air Station Miramar within the East Elliot Community Plan area of the City. The Otay Landfill is located within an unincorporated area within the City of Chula Vista. The SWIS database indicates that the Sycamore Landfill had a remaining capacity of 113,972,637 cubic yards as of December 31, 2016, and is expected to close December 31, 2042. The Otay Landfill had a remaining capacity of 21,194,008 cubic yards as of May 31, 2016, and is expected to close February 28, 2030 (CalRecycle 2025).

Campus waste at City College is generally composed of municipal solid waste, landscaping waste, recyclables, surplus equipment, laboratory waste, electronic waste, and food waste. Waste generated on the City College campus is either disposed or diverted. Methods of waste diversion at the City College campus include recycling, composting, and source reduction (i.e., not generating waste). Solid waste is primarily disposed of in designated trash and recycling containers located throughout campus which the City College facilities personnel regularly empty for transport to one of the three landfills identified above.

3.17.1.5 Electricity and Natural Gas

As described in Section 3.5, *Energy*, the campus's energy sources include energy produced at the Central Utility Plan located on campus, electricity purchased from San Diego Gas & Electric (SDG&E), and natural gas purchased from SDG&E. Electricity from SDG&E is distributed through a 12-kilovolt loop, with some buildings separately connected to 600-volt services. The campus contains a solar network consisting of an array of rooftop and carport mounted systems, which have an energy generation capacity of one megawatt (MW). The District is also in the process of installing a linear generator to provide electrical loading flexibility. SDG&E owned and operated natural gas pipelines supply natural gas to locations on campus, and electricity is supplied throughout campus via a network of underground cables and connections.

3.17.1.6 Telecommunication Services

Communications systems for telephones, computers, and cable television are serviced by private utility providers such as AT&T, Cox, Spectrum, and other independent cable companies. In addition, television services are available from two satellite services, Direct TV and Dish. Telecommunication facilities are located above and below ground within private easements throughout the City and are managed by the private utility providers. In recent years, the City has initiated programs to promote economic development through the provision of high-tech infrastructure and integrated information systems. The City also works with private service providers to underground overhead wires, cables, conductors, and other structures associated with communication systems in residential areas.

3.17.2 Regulatory Framework

A summary of federal, state, District, and local regulations that pertain to utilities and service systems is provided below. No regional regulations regarding utilities or service systems apply to the project.

3.17.2.1 Federal

Safe Drinking Water Act of 1974

The Safe Drinking Water Act authorizes the U.S. Environmental Protection Agency (USEPA) to set national health-based standards for drinking water to protect against both naturally-occurring and human-made contaminants that may be found in drinking water. The USEPA, individual states, and water system service providers then work together to make sure that these standards are met. Originally, the Safe Drinking Water Act focused primarily on treatment as the means of providing safe drinking water at the tap. Amendments in 1996 greatly enhanced the existing law by recognizing source water protection, operator training, funding for water system improvements, and public information as important components of safe drinking water. This approach ensures the quality of drinking water by

protecting it from source to tap. The Safe Drinking Water Act applies to every public water system in the U.S.

Clean Water Act

The Clean Water Act's (CWA's) primary goals are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The CWA forms the basic national framework for the management of water quality and the control of pollution discharges; it provides the legal framework for several water quality regulations, including the National Pollutant Discharge Elimination Program (NPDES), effluent limitations, water quality standards, pretreatment standards, antidegradation policy, nonpoint-source discharge programs, and wetlands protection. Refer to Section 3.9.2 for additional information regarding the CWA, State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB), and NPDES requirements.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) gives the USEPA the authority to control hazardous waste from the "cradle-to-grave." Refer to Section 3.8.2.1 for further discussion of the RCRA as it relates to hazardous waste. RCRA also set forth a framework for the management of non-hazardous solid waste. Regulations established regarding solid waste include a ban on open dumping of waste and set minimum federal criteria for the operation of municipal waste and industrial waste landfills, including design criteria, location restrictions, financial assurance, corrective action (cleanup), and closure requirements.

3.17.2.2 State

Senate Bill 610

For certain types of large projects, Senate Bill (SB) 610 requires that the associated environmental document includes a discussion of the availability of water to meet the projected water demands of a project for a 20-year planning horizon, including single and multiple dry years. California Water Code Section 10912 specifies the types and sizes of projects that are subject to the provisions of this law requiring preparation of a separate Water Supply Assessment, which include developments that would demand more water than 500 equivalent dwelling units. California Water Code Section 10910 specifies that these requirements apply to cities and counties approving projects subject to CEQA; therefore, the District is not required to prepare a Water Supply Assessment.

Assembly Bill 1881

Assembly Bill 1881, the Water Conservation in Landscaping Act of 2006, required DWR to prepare an updated Model Water Efficient Landscaping Ordinance (MWELO) in accordance with specified requirements to conserve water through efficient irrigation and landscaping. By January 1, 2010, local agencies were required to adopt either the updated MWELO or a local landscape ordinance that is at least as effective in conserving water as the MWELO.

Urban Water Management Act

The Urban Water Management Plan Act was passed in 1983 and codified as Water Code Sections 10610 through 10657. Since its adoption in 1983, the Urban Water Management Plan Act has been amended

on several occasions. Some of the more notable amendments include an amendment in 2004, which required additional discussion of transfer and exchange opportunities, non-implemented demand management measures, and planned water supply projects. Also, in 2005, another amendment required water use projections (required by Water Code Section 10631) to include projected water use for single-family and multi-family residential housing needed for lower-income households. In addition, Government Code Section 65589.7 was amended to require local governments to provide their adopted housing elements to water and sewer providers. The Urban Water Management Plan Act requires urban water supplier providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually, to prepare and adopt an urban water management plan. Urban water suppliers must file these plans with DWR every five years, describing and evaluating reasonable and practical efficient water uses, reclamation, and conservation activities. As required by the Memorandum of Understanding Regarding Urban Water Conservation in California and AB 11, the 2005 Urban Water Management Plan Act incorporated water conservation initiatives and a Water Shortage Contingency Plan.

Integrated Waste Management Act

As discussed further in Section 3.8, *Hazards and Hazardous Materials*, the California Integrated Waste Management Act of 1989 (AB 939), which is administered by CalRecycle, requires counties to develop an Integrated Waste Management Plan that describes local waste diversion and disposal conditions, and lays out realistic programs to achieve waste diversion goals. Integrated Waste Management Plans compile Source Reduction and Recycling Elements prepared by each local government, to focus diversion efforts and provide a framework to meet waste reduction mandates. The goal of the solid waste management efforts is not to increase recycling, but to decrease the amount of waste entering landfills. AB 939 required all cities and counties to divert a minimum of 50 percent of all solid waste from landfill disposal. In 2011, the state legislature enacted AB 341 (Public Resources Code [PRC] Section 42649.2), increasing the diversion target to 75 percent statewide. AB 341 also requires the provision of recycling service to commercial and residential facilities that generate 4 cubic yards or more of solid waste per week.

Senate Bill 1383

SB 1383, signed by Governor Brown in September 2016, is intended to decrease greenhouse gas (GHG) emissions and slow the effects of climate change by reducing the amount of organic materials in landfills. Beginning January 1, 2022, all California residents, businesses, and multifamily complexes were required to separate food waste and yard waste from their trash and recycle in a separate organic cart, and Tier 1 food generators, such as supermarkets and large grocery stores, were required to start donating edible food. On January 1, 2024, Tier 2 generators, including hotels, large restaurants, and schools with cafeterias, were required to begin food-donation programs, and CalRecycle gained full enforcement authority with the ability to issue penalties. By January 1, 2025, the state was required to achieve a 75 percent reduction in organic waste disposal from 2014 levels and recover 20 percent of edible food for human consumption.

Water Recycling Act

The Water Recycling Act of 2013 (AB 803) eliminates inconsistent recycled water spill reporting thresholds by making those in the California Health and Safety Code consistent with those in the Porter-Cologne Water Quality Control Act. In addition, AB 803 authorizes RWQCBs to permit the introduction of

Advanced Treated Purified Water into conveyance systems prior to comingling with any raw water or other water source. The bill defines Advanced Treated Purified Water as wastewater treated by a method at least as effective as membrane filtration, reverse osmosis, advanced oxidation, disinfection, and engineered reliability features.

Water Conservation Act

The Water Conservation Act of 2009 (SB X7-7) required all water suppliers to increase water use efficiency. The legislation set an overall goal of reducing per capita water use by 20 percent compared to water provider-specific baseline levels by 2020, with an interim goal of 10 percent reduction by 2015. Effective in 2016, urban retail water suppliers that did not meet the water conservation requirements established by this bill were not eligible for state water grants or loans. SB X7-7 requires urban retail water suppliers to determine baseline water use and set reduction targets according to specified standards.

CALGreen

Refer to Section 3.5.2.2 for further discussion of the California Green Building Standards Code (CALGreen; CCR Title 24, Part 11), especially as it relates to energy efficiency and GHG emission reductions. Portions of CALGreen relevant to water use and solid waste are described here. CALGreen provides mandatory water efficiency and conservation measures for both residential and non-residential development. The mandatory measures specify allowable flow rates for different appliances and require compliance with the MWELO (or applicable, more stringent local ordinance). CALGreen also requires at least 65 percent of non-hazardous construction and demolition debris is recycled and/or salvaged for reuse during construction.

3.17.2.3 District

District Design Guidelines and Standards Manual

Sustainability & Climate Strategy

Section 1.3, *Sustainability & Climate Strategy*, of the District Design Guidelines and Standards Manual includes the Climate Action Plan, Sustainability Plan, Green Policies, and SDCCD Sustainability Levels.

Sustainability Plan

The District's Sustainability Plan incorporates the California Community Colleges Chancellor's Office's comprehensive Climate Action and Sustainability Framework, which includes the following goals related to utilities and service systems.

Water Conservation

- 2025 Benchmark: Benchmark potable water usage.
- 2030 Goal: Reduce potable water usage by 25%.
- 2035 Goal: Reduce potable water usage by 50%.

Waste Reduction

- 2025 Benchmark: Benchmark and comply with state regulations.
- 2030 Goal: Reduce total material consumption by 10%.

- 2035 Goal: Decrease consumption of materials by 25%.

These goals incorporated into the District's Green Growth program that shall be considered on future facility improvement projects include the following goals and associated Key Performance Indicators (KPIs) related to utilities and service systems.

Materials Impact Goal 1: Reduce waste going to landfill by 75 percent compared to current levels by 2030. **KPI:** Require contractors to submit waste tickets and documentation to verify diversion.

Water Impact Goal 1: Decrease water usage. **KPI:** Separate landscape from domestic water reporting. **KPI:** Implement rainwater capture. **KPI:** Use water efficient plumbing fixtures. **KPI:** Plant native and water efficient planting.

Water Impact Goal 3: Upgrade & Improve long term maintenance of utilities. **KPI:** Increase number of valves on utility loops to allow for increased maintenance access. **KPI:** Provide monitoring system of underground utilities. **KPI:** Eliminate waterless fixtures.

General Specifications

Section 2.2 of the District Design Guidelines and Standards Manual includes general specifications and product and material data for the construction of District projects. These are expected to be incorporated into the design of future District projects; however, design professionals may work with the District to include modifications to the general specifications via special conditions to meet specific site conditions and/or program needs. The following specifications are related to utilities and service systems.

Construction Waste Management and Disposal

General requirements outlined in this section include the implementation of a construction waste management plan to reduce the amount of waste going to landfills during construction. Contractors are required to provide a Waste Management Plan to Campus Facility Services which specifies the locations on campus where recycled materials will be collected, staged, handled, and picked up. Source separation of construction waste for recycling is required wherever possible. This section additionally outlines the waste reduction goals of the District, which include a minimum "end-of-project" recycling rate of 75 percent for non-hazardous solid waste, a further goal of 90 percent diversion from landfills and incinerators by weight, including both demolition and construction waste, and efficient material use and diversion of waste from landfills.

This section defines materials that would be recycled and salvaged during construction of District projects. These include demolition waste (asphalt paving and concrete); construction waste (masonry and concrete masonry unit, wood and sheet materials, metals, roofing materials, insulation, carpet and pad, gypsum board, piping, and electrical conduit). In addition, this section states that uncontaminated packaging materials (paper, cardboard and boxes, plastic sheet and film, polystyrene packaging, wood crates, and plastic pails) must be salvaged or recycled at a rate of 100 percent.

Sanitary and Storm Sewer Systems

This section defines goals and objectives related to sanitary and storm sewer systems on District properties, and states that the design of stormwater and sanitary sewer systems should involve

coordination with state and local governing authorities and should comply with the Phase II Municipal Separate Storm Sewer System (MS4) permit standards regarding stormwater discharge from the campus. In addition, stormwater shall be filtered through landscaping or other means whenever possible. Refer to Section 3.9, *Hydrology and Water Quality*, for additional discussion of stormwater pollution controls and permits.

3.17.2.4 Local (Non-Regulatory)

The District is not subject to municipal plans, policies, and regulations. However, the campus would continue to dispose of its solid waste at Miramar Landfill, and the following regulations are enforced by the City as a means to divert waste, in compliance with state regulations. The District also coordinates infrastructure needs with the City given the campus is dependent on certain City utility infrastructure. The projects implemented under the FMP would require connections to existing utilities within the City's ROW; therefore, the City's drainage and stormwater policies are discussed below.

City of San Diego Municipal Code

San Diego Municipal Code Section 142.0101 et seq., Grading Regulations, addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation, and protection of the public health, safety, and welfare of persons, property, and the environment. Requirements related to hydrology include implementation of temporary and permanent erosion, sedimentation, and water pollution control measures from those outlined in San Diego Municipal Code Chapter 14, Article 2, Division 2, Storm Water Runoff Control and Drainage Regulations.

City of San Diego Zero Waste Plan

The City's Zero Waste Plan, a component of the City's Climate Action Plan (CAP), was approved and adopted by the City Council on July 13, 2015. The CAP was updated in August 2022 and includes Strategy 4: Circular Economy and Clean Communities Measure 4.4, which calls for the City to update its zero waste plan. In the updated CAP, the City established waste diversion targets of 82 percent in 2030 and 90 percent in 2035. The 2015 Zero Waste Plan identified that the City increased its diversion rate from approximately 40 percent in 1995 to approximately 67 percent in 2013. In addition, the Zero Waste Plan discusses how the adoption and implementation of the City Recycling Ordinance (San Diego Municipal Code Chapter 6, Article 6, Division 7), Construction and Demolition Debris Deposit Ordinance (San Diego Municipal Code Chapter 6, Article 6, Division 6) and "a variety of other waste diversion programs" have moved the City closer to the goals outlined in the Zero Waste Plan.

City of San Diego Drainage Design Manual

The City's Drainage Design Manual (City 2017) provides policies and procedures to attain reasonable standardization of drainage design throughout the City. The Drainage Design Manual establishes design standards and design procedures for stormwater conveyance and hydrology analysis for flood management and water quality facilities in the City. These design standards and procedures provide guidance to design engineers, developers, contractors, and others in the selection, design, construction, and maintenance of stormwater conveyance facilities.

City of San Diego Stormwater Standards

The City's Stormwater Standards were developed to comply with NPDES permits administered by the state. To comply with permit requirements, the City is required to develop and implement stormwater pollution controls for private and public development projects for both the construction and postconstruction phases. Stormwater pollution controls, in the form of both structural and nonstructural best management practices (BMPs) are designed to reduce pollutants discharged from project sites to the maximum extent practicable. Refer to Section 3.9.2.5 for additional details.

3.17.3 Thresholds of Significance

Thresholds used to evaluate potential utilities and service systems impacts are based on CEQA Guidelines Appendix G. A significant utilities and service systems impact could occur if implementation of the proposed project would:

1. 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;

2. Have insufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years;

3. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it does not have adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments;

4. 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; or

5. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.17.4 Impact Analysis

3.17.4.1 Relocation or Construction of Utilities

Threshold 1: Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Discussion

Program-Level

Future campus development projects would require connections to the existing utility infrastructure within and surrounding the campus. More specific information about each utility type is provided in the following subsections; however, the overall procedure for determining the utility requirements for future projects applies to each utility. During the design phase of District projects, civil engineering

consultants develop projections of project utility demands to confirm that existing utility capacity is available to serve the project in combination with existing campus or adjacent development. Based on the proposed projects largely replacing existing use types with more modern facilities, it is not anticipated that upsizing or replacement of off-site utility mains would be required. Rather, individual projects would connect to the existing utilities available within and surrounding the project site.

As these connections to existing infrastructure are anticipated to occur within the campus or in adjacent, disturbed areas to replace existing utility connections, potential impacts associated with construction of these utility connections are considered throughout this PEIR. Mitigation measures identified throughout this PEIR would be implemented during such construction, as applicable based on the proposed locations.

Where off-site connections to City-owned infrastructure rather than privately-owned District infrastructure are proposed, the District would also coordinate with the City to provide the relevant demand and capacity information and receive approval to construct new connections in compliance with applicable City policies. As the projects would generally replace existing buildings with similar and upgraded facilities, these new connections are not anticipated to cause substantial increases in utility needs that necessitate off-site improvements to City-owned infrastructure capacity beyond new connections for the individual facilities. As no off-site infrastructure projects other than connections to existing infrastructure are currently known to be required to serve the proposed FMP development, further analysis of potential environmental impacts from off-site utility construction would be speculative. If future projects are determined to require additional off-site utility construction, the environmental impacts of such a project would be required to be evaluated by the relevant lead agency and mitigated in accordance with CEQA.

Water

The City College campus is in a fully developed area of the City which is currently served by existing water infrastructure operated and maintained by the City's PUD. Campus buildings are served by multiple water pipelines and laterals which connect to City water mains located in the adjacent City streets within and surrounding North Campus and South Campus as further described in Section 3.17.1.1 above. The proposed development under the FMP would involve the construction of additional building space, which could result in an increase in demand for water supplies. Future water efficiency improvements that would occur through the redevelopment of older campus buildings would partially offset potential increases in water demand resulting from the increase in building area on campus. All campus development projects would adhere to state and District water efficiency policies, including Title 24 and related sustainability policies in the District Design Guidelines and Standards Manual, that require the installation of water efficient plumbing fixtures as well as the use of drought-tolerant vegetation to reduce outdoor water use. The existing water infrastructure located throughout and adjacent to campus is anticipated to have adequate capacity and pressure to serve the proposed FMP projects, which would connect to the existing water pipelines described above. If required, the construction or replacement of water infrastructure would occur in accordance with the Domestic Water System requirements in the Design Guidelines and Standards Manual.

The construction impacts of providing water infrastructure connections to the proposed FMP facilities have been assessed throughout this PEIR and applicable mitigation measures would be implemented during construction of utility connections where applicable. No relocation or construction of additional off-site water facilities that would cause environmental effects beyond those disclosed herein would be

required. Implementation of the FMP would not require or result in the relocation or construction of new or expanded water facilities which could cause significant environmental effects that are not already analyzed in this PEIR.

Wastewater

Wastewater generated at the City College campus is currently transported to the PLWTP via a network of on-campus plumbing infrastructure maintained by the District, which then connects to existing wastewater conveyance infrastructure within adjacent City streets, easements, and ROWs. As described further in Section 3.17.1.2 above, connections to the various sewer mains that are located within the campus and in adjacent City streets serve on-campus development. Additional sewer connections to the campus network of wastewater pipelines and laterals would occur throughout the project site but are not anticipated to result in the need to expand or otherwise replace existing sewer mains off campus as buildings are replaced on campus.

The potential environmental effects associated with the construction of future connections to sewer infrastructure are included in the analysis of the proposed FMP construction activities provided throughout this PEIR, and these connections would be constructed in accordance with applicable District standards. The Design Guidelines and Standards Manual includes the Plumbing and Piping System Requirements section within Section 2.2, General Specifications, which outlines plumbing design and construction standards to ensure safe, sanitary, reliable, and maintainable wastewater conveyance systems throughout all District facilities. As outlined in this section, all plumbing design and installations on District properties would adhere to applicable codes, District specifications, and regulatory agency requirements where applicable. Refer to Section 4.17.4.3 below for additional details regarding capacity of wastewater treatment infrastructure. No other new, relocated, or expanded off-site sewer infrastructure would be required, and no associated environmental effects would occur beyond those considered in this PEIR for future sewer connections.

Stormwater Drainage

Stormwater on the City College campus currently drains towards existing curbs, gutters, and landscaped areas throughout campus or within adjacent streets. With implementation of the FMP, stormwater would drain in a similar manner. As discussed further in Section 3.9, *Hydrology and Water Quality*, projects implemented under the FMP would incorporate low-impact development (LID) features and water-quality treatment infrastructure consistent with the requirements in the Design Guidelines and Standards Manual and state stormwater permit conditions. Because most future campus development would occur within previously developed and largely impervious areas, the overall quantity of stormwater runoff from the project site is not anticipated to increase substantially such that off-site infrastructure capacity would be exceeded. On-site stormwater capture, treatment, and conveyance infrastructure would be adjusted for future projects based on the required site-specific Water Quality Technical Report (WQTR) findings and recommendations. Further, as outlined in the Sanitary and Storm Sewer Systems section of the Design Guidelines and Standards Manual, stormwater drainage systems on District properties would be constructed in accordance with the California Plumbing Code, and in coordination with local authorities if connections to City-owned infrastructure are proposed. The anticipated stormwater improvements would be constructed within the project site and would not require new off-site drainage channels, culverts, or regional stormwater infrastructure. Therefore, the project would not result in the construction of stormwater drainage facilities that could cause significant environmental effects that are not analyzed throughout other sections of this PEIR.

Electricity

Electricity service to City College is provided by SDG&E through a network of underground power lines throughout campus. Once projects implemented under the FMP become operational, electricity would be used in a similar manner compared to existing conditions, which includes electricity for interior and exterior lighting, heating, ventilation, and air conditioning (HVAC) systems, computer and office equipment, refrigeration and cooking equipment in dining halls, electric vehicle (EV) charging stations, and additional building operations such as security systems and elevators. As discussed in Section 3.5, *Energy*, annual electricity demand at FMP buildout is anticipated to increase from 8.5 million kilowatt hours (kWh) under existing conditions to approximately 12.7 million kWh per year based on the current rate of usage and replacement of natural gas functions with electrical equivalents. However, this is a conservative estimate as it does not consider future efficiency improvements that would be achieved by replacing older buildings and equipment with more modern facilities that incorporate sustainability features and use electricity more efficiently. The existing campus electricity distribution system is anticipated to accommodate the increase in electricity demand. Throughout the implementation of the FMP, new connections would be made to the existing 12-kilovolt distribution system within the campus to provide power to new or renovated facilities, the effects of which are addressed throughout the PEIR. All new electrical connections to the campus distribution systems are required to be coordinated with and approved by the District Facilities Maintenance Department. Therefore, implementation of the FMP would not require or result in the relocation or construction of new or expanded electric power facilities that could cause significant environmental effects that are not analyzed throughout other sections of this PEIR.

Natural Gas

As discussed further in Section 3.5, *Energy*, City College currently receives natural gas from SDG&E for the heating of buildings and water, other mechanical processes, and in laboratories. The District policy is for new buildings to be all-electric and not use natural gas for processes that can rely instead on electricity, such as building or water heating. Natural gas may only be used in select instances where electricity would not serve the intended use and with prior approval by the District Architect. The older buildings on campus that are planned for demolition are typically more reliant on natural gas; therefore, as these buildings are replaced natural gas use would be reduced compared to existing conditions. As centralized building and water heating equipment requires replacement, these sources of natural gas consumption would also be replaced with electric equivalents, thereby reducing natural gas consumption. As implementation of future campus projects would result in a net decrease in natural gas consumption, implementation of the FMP would not require or result in the relocation or construction of new or expanded natural gas facilities which could cause significant environmental effects. Rather, buildout of the FMP would remove or cap a majority of the existing natural gas connections on campus.

Telecommunication Facilities

Telecommunication connections for the projects implemented under the FMP would be made to existing infrastructure that is located underground and throughout the campus. Throughout the implementation of the FMP, new connections would be made to conduit and junction box locations on campus and cabling would be provided within new buildings. The District Information Technology Services Department provides guidance to design teams based on currently available technologies to keep telecommunication services consistent across campuses. These improvements are anticipated to occur within campus; off-site infrastructure improvements by private telecommunication companies are outside of the scope of this PEIR. As such, implementation of the FMP would not require or result in the

relocation or construction of new or expanded telecommunications facilities which could cause significant environmental effects.

Project-Level

Operation of the near-term projects would require water, wastewater treatment, stormwater drainage, electricity, and telecommunication services, but would be constructed in accordance with District policies and would therefore not require natural gas connections. Consistent with the program-level analysis above, the near-term projects would be located within areas that are currently served by various service providers for water, wastewater treatment, stormwater drainage, electricity, and telecommunication services. As the near-term projects are constructed, new connections to each of these services would be required, the effects of which are analyzed throughout this PEIR as they would occur within the project-level impact areas. No alterations to existing off-site infrastructure would be required beyond these connections as the near-term projects would replace existing buildings with similar uses and connect to existing infrastructure. Therefore, the near-term projects would not 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 would cause significant environmental effects beyond those described in the project-level analysis throughout this PEIR.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not 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. **Program-level and project-level impacts would be less than significant**. Mitigation measures for construction activities may apply; however, no utility-specific mitigation is required.

3.17.4.2 Water Supplies

Threshold 2: Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact Discussion

Program-Level

Based on water bills for the period of October 2024 through September 2025, the City College campus consumes approximately 15.4 million gallons of water per year under existing conditions. To estimate the amount of water that would be consumed at full buildout of the FMP, the existing rate of water consumption per gross square foot (GSF) of building area was calculated and applied to the future anticipated GSF on campus. This determined that full buildout of the FMP would require approximately 18.9 million gallons of water per year, which would be a net increase of 3.5 million gallons per year (equivalent to approximately 10.7 AFY) compared to existing conditions. This estimate is considered conservative as future campus projects would adhere to state and District water efficiency policies, including Title 24 and related sustainability policies in the District Design Guidelines and Standards Manual, that require the installation of water efficient plumbing fixtures and drought-tolerant landscaping. The total amount of landscaped area requiring watering is also not anticipated to increase

to the extent considered in this estimate, as campus is largely landscaped under existing conditions and, where additional landscaping is added, it would use drought-tolerant vegetation.

The City's 2025 UWMP demonstrates that there will be sufficient water supplies available to meet demands for existing and planned future developments and population increases that are projected to occur in the City by 2050 (City 2026a). The UWMP estimates water supply and demand in five-year increments over a 20-year period to determine whether available supplies will meet the City's projected water demand under normal, dry, and multiple dry year scenarios. Based on a normal water supply year, the estimated water supply will meet projected water demand between 173,510 AF in 2030 and 178,259 AF in 2050. Based on a single-dry year forecast, the estimated water supply will meet the projected water demand between 180,450 AF in 2030 and 185,390 AF in 2050. During a multiple-dry year scenario, the estimated water supply will meet the projected demands wherein demand is projected to be higher at the beginning of the modeled five-year cycle and then reduce as conservation efforts are enforced due to continued drought conditions (City 2026a).

As the demand for water supplies at City College (approximately 10.7 AFY) would be a small portion of the City's overall water supply, which is obtained through a wide variety of sources to provide flexibility, and the increase in on-campus enrollment would come from the regional population, there would be sufficient water supply for full buildout of the FMP. The District would continue water conservation efforts to reduce water demand as well. The City would have sufficient water supplies available to serve campus development and reasonably foreseeable future development during normal, dry, and multiple dry years.

Project-Level

The near-term projects would involve an increase in building area on the City College campus and could therefore require additional water supplies for indoor use and/or outdoor landscaping. Each of the near-term projects were included in the program-level analysis of water demand above and would represent a small fraction of total water demand projected for the City within the City's UWMP. As each of the near-term projects would replace similar use types with more modern facilities incorporating current water-efficient fixtures required by Title 24, these projects would represent a small change in campus water demand. The City would have sufficient water supplies available to serve the near-term projects and reasonably foreseeable future development during normal, dry, and multiple dry years.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.17.4.3 Wastewater Treatment

Threshold 3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact Discussion

Program-Level

Implementation of the FMP would increase the amount of on-campus building space and the number of on-campus students and employees is also anticipated to increase over the FMP buildout period. Such increases would result in the generation and discharge of additional wastewater from the campus, which would require treatment at the PLWTP, the municipal wastewater treatment facility operated by the City for wastewater from the project area. The following focuses on treatment plant capacity; refer to Section 3.17.4.1 above for further discussion of wastewater conveyance infrastructure.

As discussed further in Section 3.17.1.2 above, the PLWTP treats approximately 175 million gallons of wastewater per day and has a treatment capacity of 240 million gallons per day (City 2025b). In addition, the City's Pure Water Program is anticipated to decrease wastewater flows to the PLWTP by directing wastewater to the North City Water Reclamation Plant and then a new Pure Water facility for treatment to recycled water standards (City 2026b).

Based on the District water usage on campus between October 2024 and September 2025, and CalEEMod default assumptions for the ratio of indoor water use to outdoor water use for the Junior College land use type, it was estimated that under existing conditions the City College campus uses approximately 9.4 million gallons per year of indoor water (translating in part to wastewater). Assuming that wastewater that would be generated during full buildout of the FMP at the same rate per GSF as under existing conditions, full buildout of the FMP would result in approximately 11.5 million gallons of wastewater generated per year. This represents a net increase of 2.2 million gallons per year or 0.006 million gallons per day compared to existing conditions. This increase in demand would represent far less than one percent of the remaining daily wastewater treatment capacity of the PLWTP prior to decreases in daily treatment demand due to Pure Water and would be accommodated within the existing capacity of this wastewater treatment plant. Therefore, implementation of the FMP would not exceed the PLWTP capacity to serve the project's projected demand in addition to the provider's existing commitments.

Project-Level

The near-term projects would involve an increase in building area on the campus and could therefore generate additional wastewater, though this increase is expected to be minimal as the near-term projects would replace similar existing uses on campus. Each of the near-term projects were included in the program-level analysis of wastewater demand above, which concluded that full buildout of the FMP would generate a small fraction of remaining wastewater treatment capacity at the PLWTP. As each of the near-term projects would represent a small portion of the full buildout of the FMP, the PLWTP would have adequate capacity to serve the near-term projects in addition to the provider's existing commitments.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would be accommodated by existing wastewater treatment facilities, which would have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.17.4.4 Solid Waste Generation

Threshold 4: Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact Discussion

Program-Level

The solid waste generated at the City College campus is currently sent to either Miramar Landfill, Sycamore Landfill, or Otay Landfill. As discussed in Section 3.17.1.4, the Miramar Landfill had a remaining capacity of approximately 11,080,871 cubic yards of solid waste and is expected to close January 1, 2031; the Sycamore Landfill had a remaining capacity of approximately 144 million cubic yards and is expected to close December 31, 2042; and the Otay Landfill had a remaining capacity of approximately 21 million cubic yards and is expected to close February 28, 2030 (CalRecycle 2025).

During construction, the projects implemented under the FMP would comply with all District and regional regulations regarding the disposal of construction-related material as discussed further under Section 3.17.4.5 below. Implementation of the plans and diversion strategies required by these regulations would prevent the majority of construction waste from being disposed of in a landfill.

Based on solid waste generation default values in CalEEMod for the land use types and size of projects proposed under the FMP, full buildout of the FMP is anticipated to generate approximately 1,803 tons of solid waste per year. Using the Volume-To-Weight Conversion chart for Campus Waste (loose) published by the USEPA, this would equate to approximately 40,063 cubic yards of solid waste per year (USEPA 2026).This amount of solid waste would be minimal compared to the remaining capacity of the existing landfills and would not exceed the remaining capacity of the existing regional landfills discussed above. However, each of the three landfills that the City College campus's solid waste is currently set to have closure dates before the FMP operational year of 2045. The City is currently in the process of planning for these closures through exploration of options for new landfill sites, implementation of a resource recovery facility at Miramar Landfill to further reduce or recycle materials, and reductions in the overall pressure on regional landfill space by increasing waste diversion to 90 percent by 2035. Development of the projects proposed under the FMP would not impede the implementation of these City actions. In addition, as discussed further in Section 3.17.4.5 below, the projects implemented under the FMP would comply with all state and District regulations related to waste reduction and recycling, which would further reduce the amount of solid waste produced on the City College campus that goes to landfill facilities. As such, implementation of the FMP would not 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.

Project-Level

The near-term projects would comply with all District and regional regulations regarding the diversion of construction-related material as discussed further in Section 3.17.4.5 below. As discussed in the program-level analysis above, full buildout of the FMP, which includes the land use type and building sizes of the near-term projects, would generate waste below the remaining capacity of the existing solid waste facilities to which solid waste generated on campus are sent.

The Building A Expansion project is anticipated to be operational in 2031, the Performing Arts Center project is anticipated to be operational in 2030, and the North Campus Athletic Fields project is anticipated to be operational in 2028. As such, solid waste from these projects may be disposed of at the Otay or Miramar Landfills until their closures, while the remainder of solid waste is anticipated to be disposed of at the Sycamore Landfill, which has a remaining capacity of approximately 114 million cubic yards and is expected to close December 31, 2042.

The amount of solid waste generated by the near-term projects would be minimal compared to the remaining capacity of these landfill facilities. Further, the near-term projects would comply with all applicable state and District solid waste regulations to reduce waste in landfills as further discussed in Section 3.17.4.5 below. Therefore, implementation of the near-term projects would not 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.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not 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. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.17.4.5 Solid Waste Regulations

Threshold 5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Discussion

Program-Level

During demolition (where required), clearing and grubbing, and grading activities, the projects implemented under the proposed FMP would produce excavated soils, green waste, asphalt and concrete, and other construction and demolition waste. The types of demolition debris that would likely be generated during construction would include metals, concrete and asphalt, brick, masonry, wood, drywall, carpet and carpet padding, ceramic tile, roofing materials, doors, windows, and fixtures. In addition, the operation of new, renovated and expanded facilities proposed under the FMP would contribute additional non-recyclable and/or non-reusable waste which would be deposited at Miramar Landfill.

The District Design Guidelines and Standards Manual identifies the goal of achieving a minimum "end-of-project" recycling rate of 75 percent for non-hazardous solid waste and a further goal of 90 percent

diversion from landfills and incinerators by weight, including both demolition and construction waste. These goals exceed the minimum CALGreen requirement to divert 65 percent of construction and demolition waste from landfills. Projects implemented under the FMP would be required to implement construction waste management plans to minimize the amount of construction waste that is disposed of in landfills in compliance with CALGreen and the District goals for construction waste reduction. Further, the Sustainability Levels identify incentives for implementing sustainable procurement policies and using at least 30 percent recycled building materials, which projects under the FMP would implement as feasible.

In compliance with state laws and programs to divert solid waste from landfills, including AB 341, City College provides recycling and organic waste disposal options on campus. Future projects implemented under the FMP would be supplied with the appropriate disposal containers and signage to continue these programs within new facilities. No new land use types are proposed that would result in noncompliance with solid waste reduction goals or regulations. The District and City College would continue to implement, promote, and improve the campus-wide comprehensive waste prevention, recycling, and diversion programs and would monitor the progress of existing programs to identify additional methods for reducing, capturing, and diverting more solid waste over time to achieve the diversion targets established under AB 341 and SB 1383. Therefore, implementation of the FMP would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Project-Level

The near-term projects would implement the District policies and goals for reducing solid waste during construction and operation, which are discussed further at the program-level above. During construction of the near-term projects, contractors would be required to implement construction waste management plans to reduce the amount of construction waste that is disposed of in landfills. Once operational, the near-term projects would be incorporated into the campus recycling program, as outlined above. As such, the near-term projects would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.17.5 Cumulative Impact Analysis

The geographic scope for utilities and service systems is the service area for each utility provider. Although public utilities can be specific to jurisdictions, some service providers operate throughout the region and across multiple jurisdictions. Therefore, changes in development influence the demand for utilities across the region and could drive the need for new or expanded utility infrastructure.

3.17.5.1 Relocation or Construction of Utilities

Cumulative development projects throughout the City could require new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities. Cumulative development projects within the City would be required to comply with City

standards for the design, construction, and operation of stormwater, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure, including requirements for capacity studies to plan for capacity increases where multiple developments would result in the need for new mains or other infrastructure. Construction of utility connections for new development or replacement mains would occur in compliance with the City's Environmentally Sensitive Lands Regulations, Historical Resources Regulations, and other applicable Land Development Code requirements, as well as any additional project-specific mitigation measures identified during environmental review of these projects. As projects implemented under the FMP would not have significant impacts related to the relocation or construction of utilities, cumulative impacts would be **less than significant**.

3.17.5.2 Water Supplies

Cumulative development projects within the City could increase demand for water that is not accounted for in existing water supply planning documents if they are inconsistent with the growth projections and land use information that informs the UWMP. However, as future community plan updates, specific plans, or other focused plan amendments are proposed, water supply assessments would be prepared to evaluate the availability of water supply, which would ensure that the water demands of planned or proposed development are incorporated into the City's water supply projections and accommodated by additional sources of water. In addition, based on the UWMP, the City has adequate water supply for normal, dry, and multiple dry years, and the minimal increase in demand caused by the projects under the FMP in combination with cumulative development projects would not cause the City to have insufficient water supplies available. Cumulative impacts related to water supplies would be **less than significant**.

3.17.5.3 Wastewater Treatment

Cumulative development projects that are proposed within the City could result in the need for new or expanded wastewater treatment facilities as no specific plans for additional wastewater treatment facilities were included in the City's latest General Plan, and the associated EIR concluded impacts to wastewater treatment facilities would be significant. Individual cumulative projects would be required to comply with the San Diego Municipal Code, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards, in addition to any additional project-specific mitigation measures. While PUD wastewater capacity planning is conducted on an ongoing basis to provide adequate wastewater facility capacity, without project-specific development plans to address future wastewater treatment demand from cumulative development projects, cumulative impacts associated with wastewater capacity would be significant. However, as implementation of the FMP, including the near-term projects, would have a marginal increase in wastewater treatment demand compared to existing conditions that would be accommodated by the existing capacity of the PLWTP, the contribution of the FMP to this impact **would not be cumulatively considerable**.

3.17.5.4 Solid Waste Generation

Similar to the projects proposed under the FMP, cumulative development projects would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects in the City would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from existing landfills to preserve capacity. Additionally, citywide efforts to reach zero waste goals through

the construction of new organics processing facilities would support landfill diversion and minimize demand on landfill capacity. Therefore, cumulative projects in combination with the FMP would not impair the attainment of solid waste reduction goals and cumulative impacts associated with solid waste would be **less than significant**.

3.17.5.5 Solid Waste Regulations

Cumulative development projects proposed in the City would be required to comply with state and City regulations regarding solid waste, including those intended to divert solid waste from landfills and citywide efforts to reach zero waste goals. Certain projects would also be required to prepare and implement Waste Management Plans to the satisfaction of the City. As the projects proposed under the FMP would additionally comply with state policies and District programs related to solid waste, cumulative impacts associated with solid waste regulations would be **less than significant**.

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3.18 Wildfire

This section addresses the potential wildfire impacts that could occur during both construction and operation of future projects implemented under the FMP. The existing conditions and regulatory setting related to wildfire are also addressed.

3.18.1 Environmental Setting

3.18.1.1 Climate

Southern California, including San Diego County (County) and the project site, is controlled largely by the large-scale meteorological condition that dominates the west coast of the U.S.: a seasonally semi-permanent high-pressure cell centered over the northeastern Pacific Ocean, called the Pacific high, which keeps most storms from affecting the California coast. Areas within 30 miles of the coast in the San Diego region, including the project site, experience moderate temperatures and comfortable humidity.

The annual average maximum temperature in the project area is approximately 69.6 degrees Fahrenheit (°F), and the annual average minimum temperature is approximately 56.4°F. Total precipitation in the project area averages 9.84 inches annually (Iowa Environmental Mesonet 2026).The predominant wind direction in the vicinity of the project site is from the northwest and the average wind speed is approximately 6.5 miles per hour (mph; Iowa Environmental Mesonet 2025). Hot, dry Santa Ana winds (which typically occur from fall through winter but may also occur intermittently in spring) are usually from the northeast and can produce wind gusts exceeding 50 mph. These winds result from episodic pressure gradients between high pressure over the Great Basin and lower pressure over the Pacific Ocean, causing offshore, downslope flow toward coastal Southern California, including the San Diego region (Murphree et al. 2018). Drying vegetation is possible during the summer months and becomes fuel available to advancing flames should an ignition occur.

3.18.1.2 Vegetation (Fuels)

The potential for wildland fires is a hazard where development occurs adjacent to open space or within close proximity to wildland fuels. Vegetation is important relative to wildfire as some vegetation, such as grassland habitats, are highly flammable, while other vegetation, such as chaparral and oak riparian forest, may be more difficult to ignite but would burn under more intense fire conditions. As discussed further in Section 3.3, *Biological Resources*, the City College campus and its immediate surroundings are entirely comprised of disturbed and developed land, and do not include any sensitive vegetation communities. Ornamental landscaping occurs within and surrounding campus, while larger areas of vegetation near the project site are associated with Balboa Park to the north.

3.18.1.3 Fire Hazard Classifications

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped Fire Hazard Severity Zones for the County, and identifies responsibility areas for fire protection, including federal, state, and local responsibility areas. CAL FIRE maintains mapping datasets that estimate fire threat potential throughout California based on presence of flammable vegetation (e.g., fuel), topography, fire history, and climate. Based on these data, areas are mapped as Fire Hazard Severity Zones and assigned one of three levels of fire hazard: moderate, high, or very high. For local responsibility areas, these hazard

zones serve as recommendations to local agencies who may add to the VHFHSZ at their discretion but may not reduce the VHFHSZ from that recommended by CAL FIRE. Only the northwestern most portion of the campus was recommended as a Very High Fire Hazard Severity Zone (VHFHSZ) by CAL FIRE. The majority of North Campus was recommended as a High or Moderate Fire Hazard Severity Zone (CAL FIRE 2025), which indicates that these southeastern areas of North Campus are at slightly less risk based on their greater distance from nearby vegetation that could serve as fuel.

The City of San Diego (City) has adopted VHFHSZ maps that add to the hazard areas recommended by CAL FIRE for its local responsibility area (City 2025). The City identifies all fire hazard zones as VHFHSZs and does not include moderate or high severity designations. As shown in Figure 4.18-1, *Wildfire Hazard Zones*, North Campus is mapped as a VHFHSZ, while South Campus is located outside of the VHFHSZ. The VHFHSZ in which North Campus occurs appears to be primarily associated with the vegetation surrounding State Route (SR) 163 within Balboa Park, north of Interstate (I-) 5, as North Campus occurs on the edge of the area mapped as a VHFHSZ.

Wildland Urban Interface (WUI) areas are another designation given to areas of the state that are at risk of fire. The WUI is a zone of transition between wilderness and human civilization that experiences a heightened risk of wildfire. The interface WUI occurs where housing is in the vicinity of wildland vegetation while the intermix WUI is mapped where housing and wildland vegetation intermingle. The influence areas of the WUI are locations where there is wildfire susceptible vegetation up to 1.5 miles from a WUI or intermix area. The western portion of North Campus is within the interface area of the WUI, while the eastern portion of North Campus is within the influence zone of the WUI (CAL FIRE 2025b).

3.18.1.4 Fire History

Fire history information can provide an understanding of fire frequency, fire type, vulnerable areas, and significant ignition sources. It is noted that the fire history presented in this section relies on the Fire and Resource Assessment Program database, which summarizes fire perimeter data dating to the late 1800s but is incomplete because it only includes fires over 10 acres in size and does not have complete perimeter data, especially for the first half of the twentieth century (CAL FIRE 2025c).

There has been no recorded fire on the project site. As the project site is within the City's heavily urbanized downtown area, large wildfires have not been of significant concern. The largest nearby fire was the 1985 Lehr Fire, located approximately 3.4 miles northeast of the City College campus, which burned approximately 155.19 acres along the northern edge of the Normal Heights neighborhood and surrounding slopes on June 30, 1985 (CAL FIRE 2025c).

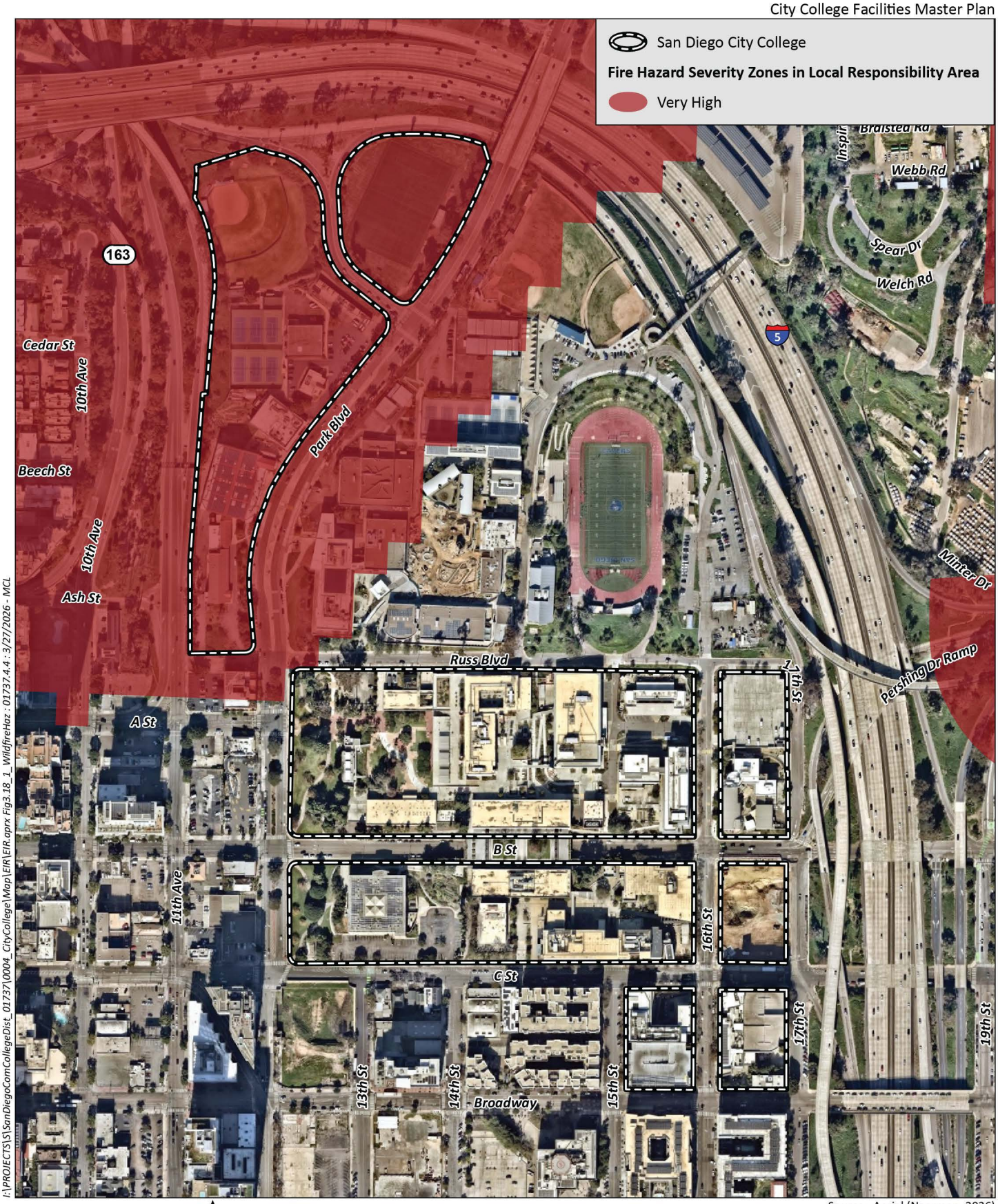
3.18.2 Regulatory Framework

A summary of state, regional, District, and local regulations that pertain to wildfire is provided below. No federal regulations regarding wildfire apply to the project.

3.18.2.1 State

California Building Standards Code

Multiple parts of the California Building Standards Code (Title 24 of the California Code of Regulations [CCR]) address fire safety through building codes. The California Building Code (CBC), contained in Part 2



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0 400 Feet

Source: Aerial (Nearmap, 2026)

HELIX Environmental Planning

Wildfire Hazard Zones

Figure 3.18-1

of Title 24, identifies building design standards, including fire protection systems and life safety standards for all buildings. Typical fire safety requirements of the CBC include the installation of fire sprinklers in all new high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and provision of smoke detectors. Updates in CBC Chapter 10 enacted in 2022 refined egress requirements to ensure safe evacuation during fire events. The enhancements focus on clearer pathways and improved access points for emergency response personnel to minimize evacuation time and ensure access for firefighting teams during emergencies.

Title 24, Part 7, Materials and Construction Methods for Exterior Wildfire Exposure, also known as the California Wildland Urban Interface Code (CWUIC) prescribes building materials and construction methods for new buildings in a VHFHSZ or WUI. These standards establish requirements that enhance fire resistance and mitigate fire spread from wildfires into developed areas to reduce the likelihood of property or life loss during fires. Part 7 contains building material requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. Other standards require exterior defensible space, adequate water supply for firefighting, and a fire protection plan.

The California Fire Code (CFC), Title 24, Part 9, incorporates, by adoption, the International Fire Code of the International Code Council, with California amendments. The CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. The CFC standards enhance safety and accessibility for firefighters and other emergency responders during emergency events.

California Public Resources Code

Fire Hazard Severity Zones

Public Resources Code (PRC) Sections 4201 through 4204 apply to State Responsibility Areas, and Government Code Sections 51175 to 51189 direct CAL FIRE to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. The Fire Hazard Severity Zone maps are used to direct the application of various mitigation strategies to reduce the risk associated with wildland fires. Fire hazard designations are based on topography, vegetation, and weather, among other factors, with higher hazard category sites including steep terrain, unmaintained fuels/vegetation, and WUI locations. CAL FIRE also provides fire hazard designation recommendations for local jurisdictions based on these data. Projects situated in VHFHSZs require fire hazard analysis and application of fire protection measures that have been developed to specifically result in defensible communities in these WUI locations.

California Strategic Fire Plan

The California Strategic Fire Plan, developed and adopted in response to PRC Sections 4114 and 4130, is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. By placing emphasis on what needs to be done long before a fire starts, the California Strategic Fire Plan looks to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health. The Strategic Fire Plan has a vision for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the

benefits and threats of wildland fire. These goals would be achieved through local, state, federal, tribal, and private partnerships (CAL FIRE 2018).

3.18.2.2 Regional

County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The purpose of the County's Multi-Jurisdictional Hazard Mitigation Plan (County 2023) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. In order to qualify for hazard mitigation funding, this type of plan is also required by the federal Disaster Mitigation Act of 2000. The plan was last revised in 2023 to reflect changes to the hazards threatening San Diego County and the programs in place to minimize or eliminate those hazards. An important component of the plan is the Community Emergency Response Team, which educates community members about disaster preparedness and trains them in basic response skills, such as fire safety, light search and rescue, and disaster medical operations. The Multi-Jurisdictional Hazard Mitigation Plan is a collaborative effort among various jurisdictions within the County, and it includes input and coordination with local entities, including the City of San Diego Fire-Rescue Department (SDFD).

County of San Diego Emergency Operations Plan

The County's Emergency Operations Plan was approved in August 2022 and provides a framework for emergency response within the County. The Emergency Operations Plan outlines procedures for safe and effective evacuation during emergencies, including the importance of identifying evacuation routes and ensuring public awareness of these routes through communication systems. The Emergency Operations Plan also outlines roles and responsibilities for law enforcement, fire service, and public health personnel during emergencies to streamline evacuation and emergency response efforts.

The Emergency Operations Plan dictates who is responsible for a large-scale evacuation effort and how regional resources will be requested and coordinated (County 2022). First responders are responsible for determining initial protective actions before the Emergency Operations Center and emergency management personnel have an opportunity to convene and gain situational awareness. Initial protective actions are shared and communicated to local Emergency Operations Centers and necessary support agencies as soon as possible to ensure an effective, coordinated evacuation. During an evacuation effort, the designated County Evacuation Coordinator is the County Sheriff, who is also the Law Enforcement Coordinator. The County Evacuation Coordinator is assisted by other law enforcement and support agencies. While City College and the District are not signatories to the Emergency Operations Plan, this plan is relevant to regional response efforts that involve mutual aid between jurisdictions. The SDFD, which serves as the campus fire protection agency, is part of the mutual aid network outlined in the Emergency Operations Plan.

3.18.2.3 District

District Design Guidelines and Standards Manual

Design Guides and Standards

Section 2.1, Design Guides and Standards, includes guidelines for the design of facilities on the District campuses. Related to wildfire, all District facilities are required to be designed and constructed in compliance with the CFC, including requirements for fire resistant wall assemblies. Fire access roads are also required to meet the standards of the California Building Standards Code.

Projects are required to provide a fire accessibility site plan showing features such as access gates, fire hydrants, and sprinkler risers. A fire flow test from the six months prior to submittal to the Division of the State Architect (DSA) is also required to demonstrate adequate fire flow is available. DSA also requires a local fire authority review approval of the fire accessibility site plan.

District Board Policies and Administrative Procedures

Board Policies 3505 (Emergency Response Plan) and 7415 (Fire, Earthquake, and Disaster Safety) direct the Chancellor to establish procedures that ensure that the District implements a plan to be activated in the event of an emergency or the occurrence of a natural disaster or hazardous condition. This plan must comply with the National Incident Management System and the Standardized Emergency Management System, and should incorporate the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, and other relevant programs. The plan must also identify training requirements for District employees depending on their assigned roles within the emergency plan.

The communications requirement of this Board Policy is implemented by Administrative Procedure 7415.2 (Emergency Communications), which establishes specific procedures to ensure dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. The Emergency Communications Response Plan defines what qualifies as an emergency, identifies who is responsible for initiating notifications, and specifies the communication systems that may be used, such as mass-notification platforms capable of delivering calls, texts, and emails. Following an emergency, the District Chancellor and/or President would reconvene the emergency team and review the process and situational response for continuous improvement of the District's emergency response.

San Diego City College Emergency Response Plan

The San Diego City College Emergency Response Plan (San Diego City College 2026) was prepared in accordance with the requirements outlined in Board Policy 3505 and Board Policy 7415 described above. The Emergency Response Plan outlines how the City College campus prepares for, communicates during, and responds to a wide range of emergencies to protect students, employees, and visitors. It establishes an Emergency Response Team, details communication methods, and provides step-by-step procedures for incidents such as earthquakes, fires, hazardous material spills, medical emergencies, active-shooter situations, power outages, and protests. The plan also emphasizes regular training and drills, coordination with local emergency agencies, and clear post-incident recovery protocols, including counseling, debriefing, and plan updates, to ensure continuous improvement and campus-wide readiness.

3.18.2.4 Local (Non-Regulatory)

Although the District is not subject to local development regulations, the City College campus is located adjacent to properties within the City that would be subject to the City's brush management requirements, which are outlined below for reference.

City of San Diego Municipal Code

Section 142.0412 of the San Diego Municipal Code sets forth brush management requirements to reduce the risk of fire hazards. Brush management is required on publicly or privately owned land that is within 100 feet of a structure and contains native or naturalized vegetation. Three defensible space zones are established. Zone 0 is a 5-foot-wide space extending out from the exterior building wall where no vegetation or other combustible materials are allowed. Brush Management Zone One extends from 5 to 35 feet from exterior walls. All native vegetation must be removed and replaced by approved and irrigated landscaping. Brush Management Zone Two extends 35 to 100 feet from exterior walls. Within Zone Two, 50 percent removal of native vegetation and 50 percent thinning of remaining vegetation is required; Zone Two is required to be maintained on a regular basis by pruning and thinning plants, removing invasive species, and controlling weeds. Although City College is not subject to the San Diego Municipal Code, the City's brush management requirements are similar to those contained in the CWUIC, which establish Zone One within 5 to 30 feet from exterior walls and Zone Two between 30 and 100 feet from exterior walls.

3.18.3 Thresholds of Significance

Thresholds used to evaluate potential wildfire impacts are based on CEQA Guidelines Appendix G. A significant wildfire impact could occur if implementation of the proposed project would occur within or near state responsibility areas or lands classified as VHFHSZs and would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;

2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

3. 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; or

4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As described in Section 3.18.1.3 and shown in Figure 3.18-1, portions of the campus are within or adjacent to VHFHSZ areas mapped for a Local Responsibility Area. Therefore, each of the Appendix G thresholds apply to the project location and potential effects of the project are evaluated in the following impact analysis.

3.18.4 Impact Analysis

3.18.4.1 Emergency Plans

Threshold 1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact Discussion

Program-Level

As future FMP projects would be constructed within the campus boundaries, construction work would not substantially impair emergency response or evacuation plans which direct evacuation towards major City roads. As discussed further in Section 3.8.1.2, the evacuation routes near the City College campus identified in the County's Multi-Jurisdictional Hazard Mitigation Plan include I-5, 11th Avenue, and Ash Street. For FMP projects that require work within the City right-of-way (ROW), such as connections to existing utilities adjacent to campus or campus entrance alterations in City streets, the District would be required to obtain and comply with the conditions of a Public Right-of-Way Permit to prepare and implement a Traffic Control Plan in accordance with City policies to ensure emergency access is maintained on City streets. During construction occurring within the campus boundaries, construction-related access alterations could interfere with emergency access within the campus. While the District intends to maintain emergency access by clearly delineating the limits of construction work and providing signage where temporary circulation changes are required, these procedures are not mandated by law. Therefore, during construction, future FMP projects could temporarily impair emergency response or evacuation plans.

Once operational, FMP projects would implement District policies that address emergency situations. As described in Section 3.18.2.3, the District has developed Board Policies 3505 (Emergency Response Plan) and 7415 (Fire, Earthquake, and Disaster Safety) that ensure that a plan is prepared to address procedures that apply in the event of an emergency or the occurrence of a natural disaster or hazardous condition. The campus Emergency Communications Response Plan (Administrative Procedure 7415.2), which implements Board Policy 7415 (Fire, Earthquake and Disaster Safety) ensures the dissemination of information to students, employees, and the community in a consistent and effective manner in the event of an emergency. This plan complies with the National Incident Management System and the Standardized Emergency Management System and should incorporate the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, and other relevant programs. See Section 3.18.2.3 above for additional information about these emergency response plans and programs. These plans would be updated with evacuation routes for new campus buildings as they are constructed but no impairment of these plans would occur as a result of FMP implementation.

As discussed further in Section 3.13, *Public Services*, emergency response to the campus would involve the SDFD and/or District Police Department, depending on the nature of the emergency. In addition, the Emergency Response Plan established the Emergency Response Team, which consists of designated personnel from security, administration, facilities management, health services, and other relevant departments who are responsible for coordinating and implementing the Emergency Response Plan.

Throughout the buildout of the FMP, there would be an increase in building area and on-campus student enrollment. As this development and enrollment increase occurs, the District and the leadership

within the Emergency Response Team would continue to evaluate the emergency response programs and plans that are in place and expand the staff responsible for the execution of the emergency response plans as necessary. In addition, as discussed further in Section 3.18.4.2 below, the projects implemented under the FMP would incorporate the required fire safety elements and would not exacerbate wildfire risks. Therefore, once projects are operational, the FMP would not substantially impair an adopted emergency response plan or emergency evacuation plan.

Project-Level

The near-term projects proposed under the FMP would not cause a direct increase in the campus' population but would result in additional on-campus building area that could affect the existing emergency response framework for the campus. Each of these near-term projects would be constructed in accordance with all applicable state and District requirements for fire-safe construction and would not exacerbate fire risks. However, construction of the near-term projects could result in changes to emergency access within campus and on adjacent City roadways. While temporary work affecting City streets would be subject to a Traffic Control Plan prepared to the satisfaction of the City, the preparation of a similar plan for on-campus circulation is not mandated by existing policies. Therefore, on-campus construction could temporarily impair emergency access.

As discussed in the program-level analysis above, the District and leadership within the Emergency Response Team would evaluate the emergency response programs and plans that are in place and expand the staff responsible for the execution of the emergency response plans when determined to be necessary. The proposed near-term buildings would have evacuation plans and be incorporated into the overall evacuation zone framework established for the campus. Therefore, operation of the near-term projects would not impair an adopted emergency response plan or emergency evacuation plan.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not substantially impair an adopted emergency response plan or emergency evacuation plan but could interfere with emergency access to campus through construction-period road closures on campus. **Program-level and project-level impacts would be significant prior to mitigation**.

Mitigation Measures

Program-Level

Mitigation measure TRA-1, provided in Section 3.15.4.4, which requires notifications, identification of alternative emergency routes, and implementation of appropriate signage in the event of on-campus lane or roadway closures, would apply to future campus projects.

Project-Level

Mitigation measure TRA-1, provided in Section 3.15.4.4, would apply to each of the near-term projects.

Level of Significance After Mitigation

Implementation of mitigation measure TRA-1 would reduce program-level and project-level impacts related to construction-period emergency access to a level that is **less than significant**.

3.18.4.2 Wildfire Risks

Threshold 2: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Impact Discussion

Program-Level

North Campus is located within a VHFHSZ (refer to Figure 3.18-1). During construction of individual projects under the FMP, contractors would be required to comply with applicable state regulations in place to reduce the risk of construction-related fire events. Chapter 33 of the CFC includes requirements that would be implemented during the period of FMP project construction and demolition, such as developing and implementing a written plan for fire prevention, maintaining accessibility for fire apparatus, the provision of fire extinguishers on the construction site, and vegetation management on the project site.

The addition of new buildings to campus also would not exacerbate fire risk, as each project would be constructed in accordance with applicable regulations intended to protect occupants and buildings from fire events. At the state level, this would include compliance with the California Building Standards Code, which requires the use of ignition-resistant materials, the installation of automatic fire sprinkler and alarm systems, defensible space establishment, and the inclusion of fire access roads. Adherence to the CWUIC would be required when projects are constructed within the VHFHSZ. At the District level, new buildings on District properties would be required to comply with the fire-related requirements in the District Design Guidelines and Standards Manual, including the development of a project-specific fire accessibility site plan and fire flow data report with approval by the DSA, compliance with CFC requirements for interior finishes, and compliance with the CBC fire access road requirements.

The project site gently slopes from south to north but does not contain steep, vegetated slopes that would exacerbate wildfire spread. The project site is also surrounded by existing development, where landscaping and vegetation is maintained, and the FMP would not result in construction of campus buildings in previously undeveloped, natural areas where fire risk is highest. As discussed in Section 3.18.1.1, the average wind speed in the vicinity of the campus is approximately 6.5 mph, though stronger winds can occur during weather events. The projects implemented under the FMP would not exacerbate wildfire risks due to slopes or wind above existing conditions, and, rather, would be constructed to current fire safety standards for VHFHSZs within North Campus. Implementation of the FMP would not exacerbate wildfire risks such that it would expose project occupants to substantial fire-related effects.

Project-Level

The North Campus Athletics Fields project would be located within a VHFHSZ while the Performing Arts Center project and Building A Expansion project would not be located within a VHFHSZ (refer to Figure 3.18-1). Each of these projects would be constructed in accordance with the fire safety requirements, including those requirements specific to VHFHSZs where applicable, of the CBC, CWUIC, CFC, and the DSA/District, as further discussed at the program-level above. The potential for landsliding or slope instability on the near-term project sites is considered low. The near-term projects would not exacerbate wildfire risks.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.18.4.3 Infrastructure Installation

Threshold 3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact Discussion

Program-Level

The FMP would include crosswalk alterations, curb bulbouts, fire lane enhancements, bridges across roadways, and involve the replacement or upgrade of existing utility infrastructure on an as-needed basis. However, the proposed roadway improvements would occur within the campus and existing adjacent roadways to connect already developed areas. These improvements would continue to allow fire truck access consistent with existing conditions. The utility infrastructure replacements proposed under the FMP would involve the replacement of outdated utility infrastructure with similar but more modern technology that incorporates the current requirements for fire safety.

The campus does not have existing overhead power lines and no projects implemented under the FMP would involve the construction of overhead power lines that exacerbate fire risk. Future projects under the FMP would require fire sprinklers and hydrants but are not anticipated to require additional off-site emergency water infrastructure. Limited brush management is needed within the existing campus boundary due to the high levels of existing development; however, continued or required brush clearance in the 100-foot area surrounding structures in the VHFHSZ would occur routinely in accordance with the CWUIC. The temporary and ongoing impacts to the environment that would occur as a result of infrastructure improvements proposed on campus are addressed throughout the relevant sections of this PEIR. Therefore, implementation of the FMP would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk.

Project-Level

The near-term projects would not require the installation of roads, fuel breaks, emergency water sources, or overhead power lines. Vegetation clearing up to 100 feet around proposed structures would occur within the development footprint considered throughout the project-level analysis in this PEIR. In addition, each of the near-term projects would require connections to existing utilities located within or adjacent to campus, though these connections would not exacerbate fire risk and would occur within the project-level impact area. Therefore, the near-term projects would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment not considered elsewhere in this PEIR.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, 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. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.18.4.4 Runoff, Post-Fire Slope Instability, or Drainage Risks

Threshold 4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact Discussion

Program-Level

Wildfires can greatly reduce the amount of vegetation on hillsides. Slope failures, mudflows, and landslides are common in areas where steep hillsides and embankments are present, and such conditions would be exacerbated in a post-fire environment where vegetative cover has been removed. As discussed in Section 3.6, *Geology and Soils*, the potential for landsliding or slope instability on campus is considered low given the gently sloping nature of the campus and lack of steep slopes. Therefore, the risk of post-fire instability within and surrounding the project site would be minimal. As discussed further in Section 3.9, *Hydrology and Water Quality*, the southeastern portion of campus is located within the Switzer Creek 100-year floodplain (refer to Figure 3.9-1). However, as this portion of Switzer Creek is conveyed underground and not through a natural channel, no post-fire drainage changes are anticipated to occur. In addition, the projects proposed under the FMP would not require mass grading or substantial changes in topography on the campus, and runoff would continue to drain towards existing and new curbs and gutters on campus and in adjacent streets. Therefore, implementation of the FMP would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Project-Level

Each of the proposed near-term projects would be located within the City College campus, which has a low potential for landsliding or slope instability (refer to Section 3.6, *Geology and Soils*). Therefore, the risk of post-fire instability within and surrounding the project site would be minimal. In addition, the near-term projects would not be located within the Switzer Creek 100-year floodplain (refer to Figure 3.9-1) and would not result in substantial drainage pattern alterations on their respective project sites. Therefore, the near-term projects would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Level of Significance Prior to Mitigation

Implementation of the FMP, including the near-term projects, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. **Program-level and project-level impacts would be less than significant**. No mitigation is required.

3.18.5 Cumulative Impact Analysis

The study area for the assessment of cumulative impacts related to emergency evacuation plans is the City, as emergency plans and evacuation routes are established on a citywide scale. The study area for cumulative impacts related to wildfire risks, infrastructure installation, and post-fire risks would be more localized and would include the Downtown Community Plan area and adjacent community planning areas for Uptown, Balboa Park, Greater Golden Hill, Southeastern San Diego, and Barrio Logan communities.

3.18.5.1 Emergency Plans

Construction of future cumulative development projects in the City could result in interference with emergency response or evacuation plans during temporary construction activities that block access routes. Once operational, such projects would also be required to provide permanent, adequate emergency access in accordance with the CFC and CBC. No cumulative projects are reasonably anticipated to result in permanent changes to the nearby highways and arterials such that access to existing emergency evacuation routes would be eliminated. Development within the City College campus would not physically interfere with emergency response or evacuation plans because the FMP, including the near-term projects, would not include features that prevent continued implementation of these plans. In addition, the projects implemented under the FMP would be required to establish and maintain emergency access on campus during construction in accordance with mitigation measure TRA-1 or a City permit. Similarly, cumulative development projects within the City would be required to comply with relevant state and City policies related to fire safety and circulation under the City's Right-of-Way Permit and associated Traffic Control Plan to ensure that emergency access is maintained during construction. Therefore, cumulative impacts related to emergency response and evacuation plans would be **less than significant**.

3.18.5.2 Wildfire Risks

Similar to the proposed FMP, cumulative development projects within the downtown and adjacent community planning areas could be located within or adjacent to VHFHSZs. Cumulative development projects within the City would be required to adhere to all regulatory requirements in place to minimize wildfire hazards due to construction in these areas, including compliance with the SDFD fire safety during construction and demolition standards (SDFD 2025) in addition to relevant sections of the CFC, CWUIC, and CBC. As described in Section 3.18.4.2 above, the project would not exacerbate wildfire risk based on site-specific factors or the proposed development types. Therefore, cumulative impacts related to wildfire risk would be **less than significant**.

3.18.5.3 Infrastructure Installation

Cumulative development projects could require the installation or maintenance of infrastructure that could exacerbate fire risk. Environmental impacts associated with infrastructure improvements, including any required features to address fire safety such as roads, fuel breaks, emergency water sources, or utilities would be evaluated in the respective environmental documents for discretionary projects. As discussed in Section 3.18.4.3, the FMP, including the near-term projects, would not result in environmental impacts related to the installation of infrastructure beyond those described throughout this PEIR. As such, cumulative impacts related to fire-related infrastructure installation would be **less than significant**.

3.18.5.4 Runoff, Post-Fire Slope Instability, or Drainage Risks

Cumulative development projects proposed within the downtown and adjacent community planning areas could be located on sites that are subject to downslope or downstream flooding or landslides. Similar to the project, the cumulative development projects would be subject to CBC and local geotechnical requirements that are developed for the purpose of ensuring that habitable structures are not sited in unsafe areas, such as those subject to landslides or flooding. Potential impacts related to downslope or downstream flooding or landslides would be evaluated in the respective technical reports and environmental documents for discretionary projects and design measures to reduce post-fire risk would be incorporated into project designs. As discussed in Section 3.18.4.4, the FMP, including the near-term projects, would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, cumulative impacts related to post-fire risks would be **less than significant**.

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4.0 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires that an EIR contain a brief statement disclosing the reasons why possible environmental effects of a project were found not to be significant and, therefore, were not discussed in detail in the EIR. Project impacts associated with Agriculture and Forestry Resources and Mineral Resources were determined not to be significant. A brief explanation indicating the reasons that the effects on these resources would not be significant is provided under each subheading below.

4.1 Agriculture and Forestry Resources

The project site is developed with non-agricultural uses and is designated as Urban and Built-up Land by the California Department of Conservation's (DOC's) Farmland Mapping and Monitoring Program (DOC 2022). The project site does not contain areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. As the District is exempt from local zoning and land use plan/element requirements, land owned by the District is not subject to Williamson Act contracts and is not zoned by the City of San Diego (City) for agricultural use. As such, the project would not result in the conversion of designated farmland, Williamson Act contract lands, or land otherwise used for agricultural purposes to non-agricultural uses, and there would be no impact to agricultural resources.

The existing project site does not contain forestland, timberland, or timberland zoned Timberland Production. Moreover, there is no land zoned as forest land or timberland that exists within the project site or its vicinity. The area surrounding the project site is developed with residential, open space (through Balboa Park north of the project site), educational, and commercial uses, with tree cover limited to ornamental landscaping or designated open space areas. Therefore, the project would not conflict with existing zoning for or cause a rezoning of forest land, timberland, or timberland zoned Timberland Production. No impacts to forestry resources would occur.

4.2 Mineral Resources

The Surface Mining and Reclamation Act of 1975 required the classification of land into mineral resource zones (MRZs) according to known or inferred mineral resource potential. As such, the DOC classifies the availability of mineral resources in a region into one of four MRZ categories: MRZ-1 for no mineral resources, MRZ-2 for significant resource areas with known quality and quantity, MRZ-3 for significant resource areas of unknown quality and quantity, and MRZ-4 for areas with no information. According to the California Geological Survey's Mineral Land Classification Map, the project site and its vicinity are classified as MRZ-3, indicating that the presence or significance of mineral resources cannot be determined (California Geological Survey [CGS] 2017). While there is potential for mineral deposits to occur in the project vicinity, the project site is not used for mineral extraction, is not known or designated as a locally important mineral resource recovery site, and is not designated for mineral extraction uses. The project site is developed with campus uses and is surrounded by existing development that would be incompatible with mineral extraction within the project site. Therefore, the implementation of the FMP would not result in the loss of availability of a regionally or locally important mineral resource. No impacts to mineral resources would occur.

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5.0 OTHER CEQA CONSIDERATIONS

This section includes CEQA considerations not contained elsewhere in this PEIR that are required to be included per CEQA Guidelines Section 15126. Specifically, discussions of significant irreversible environmental effects (CEQA Guidelines Section 15126[c]) and growth-inducing impacts (CEQA Guidelines Section 15126[d]) are provided in this section. A summary of significant and unavoidable environmental effects, as required by CEQA Guidelines Section 15126(b), is provided in this section based on the impact determinations provided in Section 3.0, *Environmental Analysis*, which provides further discussion of these impacts and also provides discussion meeting the requirements of CEQA Guidelines Section 15126 (a) and (e). Alternatives to the proposed project are discussed in Section 6.0, *Project Alternatives*, to meet the requirements of CEQA Guidelines Section 15126(f).

5.1 Significant and Unavoidable Environmental Impacts

CEQA Guidelines Section 15126.2(c) requires an EIR to describe any significant impacts that cannot be avoided, including those impacts that can be mitigated but not reduced to a less than significant level. Section 4.0, *Effects Not Found to Be Significant*, of this PEIR analyzes and discusses the CEQA environmental topics where the FMP, including the near-term projects, would not have a significant impact. Section 3.0, *Environmental Analysis*, of this PEIR identifies the potential environmental impacts of the project and recommends mitigation measures to reduce impacts, where feasible.

As discussed further in Section 3.4, *Cultural Resources*, implementation of the FMP and two of the near-term projects (Building A Expansion and Performing Arts Center projects) have the potential to cause a substantial adverse change in the significance of a historical resource directly through alterations to character defining features or indirectly via construction adjacent to a historical resource. To mitigate future adverse impacts to historical resources located on the City College campus, mitigation measures CUL-1 through CUL-4 are recommended for proposed alterations, additions, demolitions, and/or construction involving any of these resources: Creative Arts (Building C), Saville Theatre, City Commons (Building D), Academic Success Center (Building L), Student Affairs (Building M); Gorton Quad; the pedestrian stairs and walkway leading to Building C; and Curran Plaza. This includes projects that require the temporary removal of character-defining features, for which District should ensure the safe removal, storage, and reinstallation of the feature(s). Although mitigation measures CUL-1 through CUL-4 would reduce potential impacts on historic resources to the extent feasible, program-level impacts and project-level impacts for the Building A Expansion project and Performing Arts Center project would remain significant and unavoidable after mitigation for future projects that do not comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties as determined under mitigation measure CUL-1. See Section 3.4.4.1 for additional details.

5.2 Significant and Irreversible Environmental Effects

CEQA Guidelines Section 15126.2(d) requires a discussion of significant irreversible environmental changes that would be caused by a proposed project. Per CEQA Guidelines Section 15127, irreversible changes are only required to be addressed in EIRs when connected with the adoption, amendment, or enactment of a local plan, policy, or ordinance of a public agency; adoption by a local agency formation commission of a resolution making determinations; or when a project is subject to the National Environmental Policy Act and requires an Environmental Impact Statement. The project would involve

the adoption of the FMP by the District as the local agency, and, thus, consideration of irreversible environmental changes is required.

CEQA Guidelines Section 15126.2(d) further notes that significant and irreversible environmental changes may occur as a result of the use of nonrenewable resources during the initial and continued phases of a project since a large commitment of such resources makes removal or nonuse thereafter unlikely. Irreversible environmental changes typically fall into one of the following three categories: primary impacts, meaning the use of nonrenewable resources for a project; secondary impacts, such as highway or roadway improvements that provide access to a previously inaccessible area, thereby committing future generations to similar uses of resources; and environmental accidents resulting in environmental changes. CEQA Guidelines Section 15126.2(d) states that irretrievable commitments of resources should be evaluated to ensure that such consumption is justified.

5.2.1 Irreversible Commitment of Resources

The projects proposed under the FMP would involve a series of site improvement and facility projects on the City College campus to accommodate projected enrollment through 2045. Construction of the projects proposed under the FMP, including the near-term projects, would require the use of renewable resources such as lumber and other forest products, which could be expected to be replenished over the lifetime of each of the projects because sustainably harvested lumber supplies are increased as seedlings mature into trees. As such, the development of projects proposed under the FMP, including the near-term projects, would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources during construction of the near-term projects and buildout of the FMP.

Construction of projects under the FMP would also result in the use of nonrenewable resources, including building materials (e.g., concrete, asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel) and fossil fuels, including the use of fossil fuels for construction equipment, the transport of construction materials to the project site and the transportation of construction workers to and from the project site (e.g., natural gas, gasoline, diesel fuel, and other petroleum-based products). These materials and the resources used in their production are available in a finite supply and are generally not retrievable, although some of the materials are recyclable. Construction materials like concrete and asphalt, for example, can be crushed and recycled as road base. Projects constructed under the FMP would comply with the District's Design Guidelines and Standards Manual, which includes incentives and requirements related to the recycling of construction materials where possible. However, the recycling of these resources for project construction cannot be assured, and the project should be considered to result in an incremental increase in the demand for nonrenewable construction materials and fuels.

During operation, the projects implemented under the FMP would result in an irretrievable commitment of nonrenewable resources, such as energy resources and fossil fuels. Long-term energy resources include fuel consumed for the heating and cooling of buildings, transportation of people and goods, as well as for lighting and other energy-related needs. Electricity consumption during operation would increase the consumption of oil, coal, and natural gas to the extent the utility provider (San Diego Gas & Electric [SDG&E]) relies on such resources to generate electricity. Accordingly, this represents a long-term commitment to the continued consumption of these resources. As mandated by Senate Bill (SB) 1020, 100 percent of retail sales of electricity to California end-use customers are required to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045. This statewide

requirement would apply to SDG&E, which would in turn provide the District with electricity to ensure that the electricity utilized at full buildout of the FMP would come from renewable energy and zero-carbon resources. As discussed in Section 3.5, *Energy*, of this PEIR, the FMP, including the near-term projects, would not result in significant impacts related to wasteful use of energy, including fuel consumption, and electricity or natural gas use.

5.2.2 Irreversible Environmental Changes

Implementation of the proposed FMP, including the near-term projects, would result in irreversible environmental changes. Irreversible environmental changes are typically associated with the environmental topics of agricultural and forestry resources, biological resources, cultural resources, paleontological resources, mineral resources, and tribal cultural resources, as removal of these resource types is generally not reversible once development has occurred.

The project site is currently developed, and no agricultural, forestry, or mineral resources occur on the site. As such, implementation of projects under the FMP would not result in irreversible changes to agricultural and forestry resources or mineral resources. Further discussions of project impacts related to these resources are provided in Section 4.0, *Effects Found Not to be Significant*.

As identified in Section 3.3, *Biological Resources*, implementation of mitigation measures BIO-1 and BIO-2 would reduce program-level and project-level impacts to nesting raptors and nesting birds protected by the Migratory Bird Treaty Act (MBTA) to a level that is less than significant. Further, implementation of the FMP, including the near-term projects, would not result in a substantial adverse effect on riparian habitat or other sensitive natural community as no sensitive vegetation communities or riparian habitats occur within or adjacent to campus. Therefore, no irreversible loss of sensitive habitat or special-status species would occur.

As discussed in Section 5.1 above and in Section 3.4, *Cultural Resources*, implementation of the FMP and two of the near-term projects (Building A Expansion and Performing Arts Center projects) has the potential to cause a substantial adverse change in the significance of a historical resource directly through alterations to character defining features or indirectly via construction adjacent to a historical resource. To mitigate future adverse impacts to historical resources located on the City College campus, mitigation measures CUL-1 through CUL-4 are recommended for proposed alterations, additions, demolitions, and/or construction involving resources contributing to the City College Campus Expansion Historic District. Although mitigation measures CUL-1 through CUL-4 would reduce potential impacts on historic resources to the extent feasible, program-level impacts and project-level impacts for the Building A Expansion project and Performing Arts Center project would remain significant and unavoidable after mitigation for future projects that do not comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties as determined under mitigation measure CUL-1. See Section 3.4.4.1 for additional details. If historical resources are demolished or altered such that the eligibility of the resource is impaired, such changes would be irreversible.

In addition, as discussed in Section 3.4, *Cultural Resources,* implementation of the FMP and two of the near-term projects (Building A Expansion and North Campus Athletic Fields) have the potential to disturb archaeological resources, including human remains, due to ground disturbing activities for projects within moderate sensitivity areas, and program-level and project-level impacts would be significant prior to mitigation. However, implementation of mitigation measure CUL-5 would reduce program and project-level impacts to archeological resources to a level that is less than significant.

Impacts to human remains at the program and project-level would be reduced to a less than significant level with implementation of mitigation measure CUL-6. Similarly, and as discussed further in Section 3.16, *Tribal Cultural Resources*, impacts to tribal cultural resources at the program-level and project-level would also be reduced to a less than significant level with implementation of mitigation measures CUL-5 and CUL-6. Therefore, no irreversible loss of archaeological or tribal cultural resources would occur.

As discussed further in Section 3.6, *Geology and Soils*, the project site is primarily underlain by geologic units assigned high paleontological resource sensitivity (the Bay Point Formation or San Diego Formation), and excavation activities proposed under the FMP within previously undisturbed deposits of these geologic units would have the potential to result in disturbance of paleontological resources. However, projects implemented under the FMP, including the near-term projects, would implement mitigation measures GEO-1 through GEO-4, as applicable, which would reduce program-level and project-level impacts to paleontological resources to a level that is less than significant. Therefore, no irreversible loss of paleontological resources would occur.

Future campus projects would involve crosswalk alterations, curb bulbouts, fire lane enhancements, and bridges across roadways. However, the project would not involve road or highway improvements that would provide access to previously inaccessible areas where resources would begin to be used. As such, the FMP, including the near-term projects, would not result in significant irreversible secondary impacts.

5.2.3 Potential Environmental Damage from Accidents

Construction of the projects proposed under the FMP would involve the on-site use and/or storage of hazardous materials/wastes such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. While these substances could pose a potential health risk to construction workers and to the public during transport, handling of these materials would occur in accordance with applicable federal, state, and District regulations. In addition, the location of material storage and construction staging areas for each project would be dictated by a Stormwater Pollution Prevention Plan (SWPPP) or Water Pollution Control Plan (WPCP), which would include additional storage and containment measures requiring the regular maintenance of construction equipment and providing storage criteria for oil, gasoline, and other potential contaminants that are commonly used during construction activities. Therefore, construction activities associated with future development projects would not result in a significant risk of environmental damage from accidents involving hazardous materials.

As described in Section 3.8, *Hazards and Hazardous Materials*, implementation of the FMP would involve the demolition of various buildings, many of which were constructed when fewer regulations on building materials were in effect. Federal regulations banned the use of lead-based paints (LBPs) for residential structures in 1978, and regulations banning asbestos have continued to evolve as recently as 2024, though the U.S. Environmental Protection Agency (USEPA) rule first issued in 1989 (then later remanded) began the phase-out of asbestos-containing materials (ACMs) in many industries. Due to the age of the structures proposed for demolition, there is potential for the presence of LBPs or ACMs in these structures and proposed demolition activities could result in the release of LBP and ACMs, if they are present. As detailed in the District Standards and Guidelines Manual, a hazardous materials survey is required to identify materials that require specialized handling prior to demolition of campus building. If hazardous materials are identified, the District employs a contractor licensed for abatement and removal of the identified hazards to manage construction involving these materials as required by USEPA and California Division of Occupational Safety and Health regulations. Demolition and associated

waste disposal would also occur in accordance with the applicable regulations for managing hazardous building materials, which would protect construction workers, the general public, and the environment from adverse effects resulting from the accidental release of LBPs or ACMs.

The expansion of campus facilities could also lead to a long-term increase in the amount of hazardous materials used on campus. However, the types of hazardous materials used at City College are not expected to change as a result of future projects implemented under the FMP as the future projects would involve existing campus land use types. The quantities of common hazardous materials that are used for cleaning, maintenance, and landscaping activities would increase as additional building and landscape areas are added to campus. Campus operations that require less common types of hazardous materials include laboratory uses, vehicle maintenance, and agricultural activity on campus. The new Maintenance and Operations offices and storage areas along with new Seeds@City spaces would relocate maintenance, including vehicle maintenance, and agricultural activities that may use hazardous materials. No specific changes to laboratory programming are proposed under the FMP, though future increase in on-campus enrollment could slightly increase the use of hazardous materials in campus laboratories. The relocation of hazardous materials use and storage and the slight increase in the quantities of these materials that are used would not create a significant hazard to the public or the environment as management of these materials would continue to occur in accordance with applicable federal, state, County of San Diego (County), and District regulations as outlined in the City College Hazardous Materials Business Plan (HMBP). The City College HMBP would be updated where relevant to reflect these slight changes in the locations of hazardous materials or associated shutoff options. Adherence to all applicable regulations would ensure that the hazardous materials used for campus operations are properly managed such that no substantial hazards to the public or the environment occur. Therefore, the potential for the proposed FMP, including the near-term projects, to cause significant irreversible environmental damage from an accident or upset of hazardous material would be less than significant.

5.3 Growth Inducement

CEQA Guidelines Section 15126(d) requires that an EIR discuss a project's potential impacts related to growth inducement. CEQA Guidelines Section 15126.2(e) further states that an EIR should describe the ways in which a proposed project could directly or indirectly foster economic growth, population growth, or additional housing, and how that growth would affect the surrounding environment.

A project can have direct and/or indirect growth inducement potential. Direct growth inducement can result from the construction of new housing that would result in new residents moving to an area. Indirect growth can be induced in a number of ways, including the stimulation of economic activity within a region that would result in the need for additional housing and services to support the new employment demand, or through the elimination of obstacles to growth, including both physical and regulatory obstacles.

Growth inducement has the potential to result in an adverse impact if the growth is not consistent with or accommodated by the land use plans and growth management plans and policies for the area affected. Since the general plan of a community defines the location, type, and intensity of growth, it is the primary means of regulating development and growth in that community. The District and City College campus are not subject to the City of San Diego's (City's) General Plan, and the applicable growth management plan for the campus would be the District enrollment plans. Physical space necessitated by such enrollment growth is described in the FMP.

5.3.1 Direct Population Growth

Refer to Section 3.12, *Population and Housing*, of this PEIR for a full discussion of population and housing impacts associated with buildout of the FMP and the near-term projects. The FMP does not propose new housing that would result in a direct increase in the regional population. Under the FMP, the City College on-campus student population and employee population would increase. However, it is anticipated that this on-campus enrollment and job growth would occur as a result of an increase in students and employees from the project region, as community colleges are generally designed to target and serve local communities. Increases in enrollment would be expected to come from the existing and projected regional population and would not draw new people to the region. This regional growth is projected in the San Diego Association of Government's (SANDAG's) population projections for the County, which anticipate the regional population to increase by approximately 112,944 individuals from 2022 through 2050 and reach 3.4 million people, which represents an increase of 3.4 percent over this period.

As of Fall 2025, 6,575 students were enrolled in on-site courses at City College. The on-campus population is projected to grow by 2,854 individuals (2,281 students and 573 employees) from 2025 through 2045, which represents a growth rate of 1.5 percent per year. While the increase in on-campus population growth considered in this PEIR would outpace regional population growth, this 1.5 percent annual on-campus growth rate reflects the potential for attracting and accommodating more students in on-campus courses through implementation of planned improvements to campus facilities, academic offerings, and student services, while also providing a conservative approach for environmental analysis. City College would continue to serve the regional population as it grows and would not induce substantial regional population growth.

The physical environmental impacts associated with the construction and operation of the proposed FMP, including the near-term projects, are analyzed in Sections 3.1 through 3.18 of this PEIR. This analysis has demonstrated that there are adequate services available to serve the full buildout of the FMP and the anticipated on-campus enrollment growth that is anticipated to occur by 2045.

5.3.2 Economic Growth

The FMP would implement on-campus improvements to accommodate projected enrollment increases and associated increases in faculty and staff on campus. Construction of the projects proposed under the FMP would involve additional construction employment opportunities. Given the relatively common nature and scale of proposed future projects, the demand for construction employment is anticipated to be met within the existing and future labor market in the region. The size of the construction workforce would vary during the different stages of construction but would not be of a size such that a substantial number of laborers from outside of the County would relocate for these employment opportunities. The District also specifically prioritizes hiring construction contractors from the local workforce pursuant to its Community Benefits Agreement with the San Diego Building and Construction Trades Council and many craft unions, as further discussed in Section 3.12, *Population and Housing*.

Under the FMP, the City College on-campus student population and employee population would increase as discussed in Section 5.3.1 above. However, it is anticipated that this enrollment and job growth would occur as a result of an increase in students and employees from the project region, as community colleges are generally designed to target and serve local communities. Therefore, increases in enrollment are expected to come from the existing and projected regional population and would not

draw new people to the region. No significant physical effects are anticipated to result from economic growth generated by projects implemented under the FMP.

5.3.3 Removing Obstacles to Growth

The removal of either physical or regulatory obstacles to growth is considered to be a growth-inducing impact. A physical obstacle to growth typically involves the lack of public service and/or utility infrastructure. A project could trigger growth if it would result in infrastructure with excess capacity or if it would remove an obstacle to growth in an area, such as providing infrastructure to an area that was previously not available. A regulatory obstacle to growth typically involves a change in zoning or land use regulations that allow for an increase in growth.

The FMP proposes campus improvements that would be located within the boundaries of the City College campus, which is a developed area served by existing public utilities and services. The campus is also surrounded by urban development served by these utilities and services under existing conditions. The projects implemented under the FMP would not include the extension or expansion of public services beyond connections or upgrades to the existing infrastructure in the immediate vicinity that are required to serve the projects implemented under the FMP. Water and sewer service to the City College campus is currently provided by the City and would continue to serve the campus as buildout of the FMP occurs. Solid waste disposal service for the City College campus would continue to be provided by the City and taken to a landfill with sufficient capacity. The project also would not result in the need for new or physically altered facilities related to fire services, police services, schools, or libraries. Refer to Sections 3.13, *Public Services*, and 3.17, *Utilities and Service Systems*, for further details. As development of campus projects under the FMP would not extend public service or utility infrastructure to undeveloped areas, it would not result in the removal of an obstacle to growth that would lead to future growth.

Relative to regulatory obstacles, implementation of the FMP would not change the allowable development types or intensities outside of the boundaries of the City College campus and would therefore not remove a regulatory obstacle to growth.

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6.0 PROJECT ALTERNATIVES

6.1 Introduction

CEQA Guidelines Section 15126.6(a) requires that an EIR describe and evaluate a range of reasonable alternatives to a proposed project, or alternatives to the location of a proposed project. The purpose of the alternatives analysis is to explore ways that most of the basic objectives of a proposed project could be attained while reducing or avoiding significant environmental impacts of the project as proposed. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered. CEQA Guidelines Section 15126.6(f) specifies that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The Lead Agency is responsible for selecting a range of alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This approach is intended to foster informed decision making and public participation in the environmental process.

The CEQA Guidelines state that the discussion of alternatives should focus on alternatives "which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines Section 15126.6[b]). An EIR is not required to consider alternatives that are infeasible, have effects that cannot be reasonably ascertained, or are remote and speculative. The determination of feasibility may be based on factors such as site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries (CEQA Guidelines Section 15126.6[f][1]). Additionally, CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative that describes what would reasonably be expected to occur on the project site in the foreseeable future if the proposed project were not approved. Based on the alternatives analysis, an environmentally superior alternative is to be identified.

In developing the project alternatives to be addressed in this PEIR, potential alternatives were evaluated in terms of their ability to meet the basic objectives of the project, while reducing or avoiding the environmental impacts of the project. An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the project (CEQA Guidelines Section 15126.6[d]). Accordingly, this section covers a reasonable range of feasible alternatives that focus on avoiding or substantially lessening significant effects of the project, even if the alternatives would not attain all of the project objectives or would be more costly.

As the near-term projects are portions of the overall FMP, there are no impacts of the near-term projects that are unique to those projects and not also identified at the program level of analysis. As such, this alternatives analysis is provided at a programmatic level of analysis, considering the FMP as a whole rather than alternatives to individual near-term projects analyzed at the project level.

6.2 Project Objectives

An EIR must only discuss in detail alternatives that are capable of feasibly attaining most of the basic objectives associated with the project, while at the same time avoiding or substantially lessening the significant environmental effects associated with the project. As stated in Section 2.3, *Project Objectives*, of this PEIR, the following are the primary objectives of the proposed project:

1. Provide the facilities and infrastructure needed to accommodate projected enrollment through 2045.

2. Accommodate a diverse array of students and improve educational access for low-income and at-risk students, including single parents, foster youth, student veterans, and justice-impacted students, by providing affordable, on-campus housing and other supportive service programs.

3. Provide state-of-the-art general education, transfer, and career technical programs by using innovative technologies, teaching approaches, and instructional delivery systems.

4. Enhance City College as a "Unified Campus" with community gathering spaces, welcoming gateways, and a distinct campus identity.

5. Develop new campus facilities for programs currently relying upon facilities rated "Poor" or "Critical" on the Facility Condition Index.

6. Remove occupied building(s) from potentially active fault zones and reconstruct campus facilities outside of fault setbacks.

7. Improve campus accessibility and safety, including through the provision of wayfinding features, safe pedestrian routes, and sufficient parking for the campus population.

8. Physically connect City College to its surroundings in ways that promote community involvement while clearly distinguishing between welcomed public use and the established academic setting.

9. Incorporate sustainability features in future campus development and programming to align with state climate targets and the California Community Colleges Chancellor's Office directives related to greenhouse gas emissions reduction, energy efficiency, resource conservation, and green building standards.

10. Minimize the loss of instructional space and interruptions to campus activities during construction.

6.3 Significant Environmental Effects of the Project

Alternatives considered under CEQA should avoid or substantially lessen one or more significant environmental impacts that would occur with implementation of the project as proposed. As such, this alternatives analysis focuses on the issues discussed in PEIR Sections 3.1 through 3.18 where the project was found to have the potential to result in significant impacts on the environment related to these topics. Environmental issues where there was determined to be no impact or a less than significant impact at the program-level, including those discussed in Section 4.0, *Effects Found Not to be Significant*, are not carried forward into this alternatives analysis because it was determined that there is no potential for the project to result in significant impacts to these resources. Accordingly, the alternatives would not avoid or substantially lessen environmental impacts associated with these resources and no further analysis is warranted.

The alternatives analysis focuses on the issue areas where the analysis provided in PEIR Sections 3.1 through 3.18 concludes that there would be a significant and unavoidable impact or less than significant

impact with mitigation. In summary, the project would result in significant but mitigated impacts for the following environmental issue areas:

- Aesthetics (Light and Glare)
- Biological Resources (Special-Status Species)
- Cultural Resources (Archaeological Resources, Human Remains)
- Geology and Soils (Paleontological Resources)
- Hazards and Hazardous Materials (Emergency Response and Evacuation Plans)
- Hydrology and Water Quality (Drainage Patterns, Inundation)
- Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration)
- Transportation (Emergency Access)
- Tribal Cultural Resources (Tribal Cultural Resources)
- Wildfire (Emergency Plans)

Mitigation measures identified in this PEIR would reduce the impacts listed above below a level of significance. However, one significant impact would remain despite implementation of mitigation to the extent feasible:

- Cultural Resources (Historic Resources)

Impacts related to all other environmental issue areas were determined to be less than significant or not impacted with implementation of the project.

6.4 Alternatives Considered but Rejected

CEQA Guidelines Section 15126.6(c) requires that an EIR identify alternatives that were considered but rejected from further analysis and briefly explain the reasons for their rejection. As part of the FMP development process and the alternatives identification process for this PEIR, several alternatives were considered that would expand or redevelop campus facilities in a different way than proposed in the FMP and detailed as part of the project described in Section 2.0, *Project Description*, of the PEIR. Some of these alternatives were determined to be infeasible or not to meet the purpose of the alternatives analysis. The following describes some of the preliminary concepts considered as alternatives to the project and the reason(s) underlying their rejection from further analysis.

Pursuant to CEQA Guidelines Section 15126.6(c), factors that may be used to eliminate alternatives from detailed consideration may include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. Feasible is defined in Public Resources Code (PRC) Section 21061.1 as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.”

6.4.1 No Project Alternative – No New Development

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated along with its impacts to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The "no project" analysis considers what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. A no new development alternative would allow general maintenance and repairs to continue on campus but would not involve the construction of new facilities or major renovations of existing facilities that require discretionary approval or environmental review.

A no project alternative wherein no new development or improvements to campus facilities occur is not reasonably foreseeable based on regulatory limitations related to Measure HH. Voter approval of Measure HH in the November 5, 2024 election authorized the District to issue $3.5 billion in general obligation bonds to fund new construction, facility modernization, sustainability improvements, safety upgrades, and campus infrastructure enhancements across its campuses. The first sale of $850 million in bonds was completed in January 2025. Proceeds from the sale of bonds authorized under Measure HH are required to be used for the general purposes set forth in the ballot measure or bond sale unless otherwise authorized by the District Board of Trustees based on specific findings. While an alternative with no new development may avoid environmental effects associated with implementation of the FMP, it would continue campus operations within aging facilities and would not fulfill project objectives related to improvements in on-campus offerings, in addition to not being reasonably foreseeable based on the bond funding obligations of Measure HH. Therefore, this alternative was rejected from further analysis.

6.4.2 Alternative Campus Location

Under this alternative, a new campus would be constructed in another location within the District and the alternative campus would accommodate the new buildings and improvements envisioned in the FMP for the campus. As specified in CEQA Guidelines Section 15126.6(f)(2), the key question in considering an alternative location is whether the significant effects of the project would be avoided or substantially lessened by placing the project in another location. While no specific location within the District has been identified as available to accommodate a new campus, it is likely that the construction and operation of an alternative campus location would result in new potential environmental impacts depending on the selected location. These effects could potentially include increased construction emissions, the need for new utilities and public services resulting in impacts to natural resources, increased vehicle miles traveled (VMT) due to commutes between campuses, and inconsistency with local planning documents, among others that are not expected under the project.

The construction of an alternative campus would also require the inefficient duplication of facilities and services. While there is potential for some individual projects proposed under the FMP to occur in other locations throughout the District's service area, many of the projects would improve or expand existing campus programming and therefore depend on collaboration with existing campus programs. When the District has acquired or utilized properties that are not contiguous to its existing campuses (e.g., College of Continuing Education spaces and administrative offices), it has done so for functions that can operate independently from campus services such as student support, student life, dining, and collaborative department spaces. Because the District already has three main campuses and multiple locations providing courses through the College of Continuing Education within its service area, the construction of a new

campus would be a duplication of educational facilities resulting in the inefficient use of funds and an increase in environmental effects. Accordingly, this alternative was rejected from further analysis.

6.4.3 Off-Site Housing Alternative

California's affordable housing crisis has affected the ability of District students to pursue their educational aspirations given the expense of paying for housing and basic living necessities. A District study conducted in 2025 found that 59 percent of District students faced housing insecurity, and 23 percent reported being homeless (District 2025). By offering affordable student housing, the District can provide students with a stable living environment, enabling them to focus on their education and achieve their goals. Similarly, the lack of available and affordable housing for District employees has priced some employees out of the housing market near their work locations, resulting in the District losing valuable personnel. By providing housing options, the District intends to improve its support for the basic needs of students and employees so they may continue to study in or work for the District.

One option the District has considered to increase the District-provided housing stock is through the provision of off-campus housing near campus. This alternative could involve the acquisition of existing multi-family housing or the acquisition of property and new construction of student or employee housing. Depending on the type of construction or renovations required as well as the location of such a project, impacts from the construction of new housing could be increased, decreased, or similar to those that would occur with an on-campus housing project. Reuse of existing multi-family housing near campus would likely have negligible environmental effects while constructing new housing could have similar effects to constructing a new housing building on campus depending on the location. Housing students or employees in off-campus housing could also increase their commute trips compared to if such housing was provided within the campus. There are no specific off-campus properties currently owned or controlled by the District that are planned for development with off-campus District housing. As such, the evaluation of impacts for an off-site housing alternative would be speculative. If such a project is proposed by the District in the future and proposed renovation or redevelopment actions are subject to CEQA, a separate environmental analysis would be required. This alternative is therefore rejected from further analysis.

6.4.4 Increased Campus Housing Alternative

As described above, the District has a goal to provide affordable housing options that make living in the campus vicinity more accessible for students and employees. In addition to the Affordable Student Housing project currently under construction, an increased campus housing alternative would develop the same components proposed under the FMP while providing an additional affordable housing building to accommodate more student or employee housing within the campus. There are limited locations where such a project could be accommodated without expanding the footprint of the campus or removing campus open spaces. As such, a new affordable housing project sited within the campus would likely provide a limited number of beds compared to the one currently under construction. This alternative also would not avoid or reduce the significant environmental impacts of the project. Therefore, this alternative is rejected from further analysis.

6.5 Analysis of Project Alternatives

This section presents an evaluation of the two alternatives to the project carried forward for detailed analysis based on their ability to reduce project impacts (refer to Section 6.3) and meet most of the

project objectives (refer to Section 6.2). For both alternatives, a brief description of the alternative is first presented, followed by a comparative impact analysis relative to the significant and unavoidable or significant but mitigated impacts of the project presented in Chapter 3.0, *Environmental Analysis*, of this PEIR, and an assessment of the degree to which the alternative would meet the objectives of the project.

The No Project Alternative (Near-Term Projects Only) was selected for analysis pursuant to CEQA Guidelines Section 15126.6(e) as an alternative that represents reasonably foreseeable conditions if the project is not approved. The Historic District Preservation Alternative focuses on the avoidance of historic resources on campus as a means to avoid the significant and unavoidable impact of the project.

Table 6-1, *Comparison of Project and Alternatives Impacts*, provides a comparative summary of the project and alternatives with the purpose of highlighting whether each alternative would result in a similar, greater, or lesser impact than the project.

Table 6-1
COMPARISON OF PROJECT AND ALTERNATIVES IMPACTS

Issue Areas with Potential for Significant Impacts under the Project	Facilities Master Plan (Project)	Alternatives	
		No Project Alternative (Near-Term Projects Only)	Historic District Preservation Alternative
Aesthetics			
Light and Glare	LTSM	LTSM<	LTSM=
Biological Resources			
Special-Status Species	LTSM	LTSM<	LTSM=
Cultural Resources			
Historic Resources	SU	SU<	LTS<
Archaeological Resources	LTSM	LTSM<	LTSM<
Human Remains	LTSM	LTSM<	LTSM<
Geology and Soils			
Paleontological Resources	LTSM	LTSM<	LTSM<
Hazards and Hazardous Materials			
Emergency Response and Evacuation Plans	LTSM	LTSM<	LTSM<
Hydrology and Water Quality			
Drainage Patterns	LTSM	LTS<	LTSM=
Inundation	LTSM	LTS<	LTSM=
Noise			
Increase in Ambient Noise Levels	LTSM	LTSM<	LTSM<
Ground-Borne Vibration	LTSM	LTSM<	LTSM<
Transportation			
Emergency Access	LTSM	LTSM<	LTSM<
Tribal Cultural Resources			
Tribal Cultural Resources	LTSM	LTSM<	LTSM<
Wildfire			
Emergency Plans	LTSM	LTSM<	LTSM<

SU = significant and unavoidable impact; LTSM = less than significant impact with mitigation; LTS = less than significant impact
< represents reduced impact relative to the project
= represents same/similar impacts relative to the project

6.5.1 No Project Alternative – Near-Term Projects Only

As further described in Section 6.4.1, CEQA Guidelines Section 15126.6(e) requires evaluation of a "no project" alternative to consider what would be reasonably expected to occur if the project were not approved. A no project alternative that results in no new campus development is not reasonably foreseeable, in part due to funding obligations for the bonds that have already been sold or are authorized to be sold under Measure HH. Further, as bond sales authorized by Measure HH have occurred, the District is obligated to use those funds for projects or purposes listed in the Measure HH ballot measure and/or subsequent bond sale. Without additional funding beyond the bond sales authorized by Measure HH, the long-term projects identified in the approved FMP would not be constructed. Therefore, under this No Project Alternative, only the near-term projects would be implemented: Building A Expansion, Performing Arts Center, and North Campus Athletic Fields. These projects total approximately 133,800 gross square feet (GSF) of new construction and 43,317 GSF of demolition, resulting in a net increase of 90,483 GSF of campus building space compared to the net increase of 221,438 GSF anticipated with the project. Under this alternative, no new parking structures would be constructed.

With this alternative, campus operations would continue as they do under baseline conditions. No new buildings or other improvements planned in the FMP and requiring discretionary approval by the District other than the near-term projects would be constructed. However, minor and ongoing maintenance of existing facilities and infrastructure that do not require District discretion or environmental review could continue. Such projects could involve replacement of broken equipment or features, repainting, or movement of campus functions between existing spaces.

As student growth is anticipated to continue as a result of increases in the regional population and demand for community college courses rather than in connection with upgraded facilities or new programming, the growth in student enrollment considered as part of the project in this PEIR could continue; however, some of this growth may instead be accommodated through online enrollment. Under this alternative, the ability for students to enroll in on-campus courses could be limited by the use of existing facilities, which would remain generally in their existing conditions, and the near-term project facilities.

6.5.1.1 Impact Analysis

Aesthetics (Light and Glare)

The No Project Alternative would result in similar lighting sources as the project but is anticipated to be less intensive as the amount of new construction would be reduced. As described in the project-level analysis in Section 3.1.4.4, implementation of the near-term projects proposed under the No Project Alternative could create new sources of substantial light or glare, including new lighting associated with the North Campus Athletic Fields project, and impacts would be potentially significant. Mitigation measures AES-1 and AES-2 would continue to apply to each of the near-term projects under this alternative, which would reduce impacts related to the creation of light or glare to a level that is less than significant. In comparison with the project, new sources of lighting would be reduced but existing campus lighting would remain in place. Overall, light and glare impacts associated with this alternative would be reduced compared to the project.

Biological Resources (Special-Status Species)

As described in the project-level analysis in Section 3.3.4.1, implementation of the near-term projects proposed under the No Project Alternative could result in an adverse direct effect on Cooper's hawk or other nesting birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG Code), and adverse indirect effects to nesting raptors from construction noise within 500 feet of an active nest. Implementation of mitigation measures BIO-1 and BIO-2 would reduce impacts to nesting raptors and nesting birds protected by the MBTA to a level that is less than significant under this alternative. Overall, significant but mitigated impacts related to nesting birds and raptors would still occur under this alternative but would be reduced compared to the project due to the reduction in construction activity.

Cultural Resources (Historic Resources, Archaeological Resources, Human Remains)

As described in the project-level analysis in Section 3.4.4.1, the Building A Expansion and Performing Arts Center projects proposed under this alternative would result in demolition of contributing resources to the San Diego City College Campus Expansion Historic District and impacts would be significant. Historic resources impacts associated with the North Campus Athletic Fields project would be less than significant. The Building A Expansion and Performing Arts Center projects would implement mitigation measure CUL-2 and the District would consider the feasibility of additional mitigation measures CUL-3 and CUL-4. However, even with the implementation of all feasible mitigation measures, the Building A Expansion and Performing Arts Center project impacts would remain significant and unavoidable. As the No Project Alternative would only implement the near-term projects proposed under the FMP, this alternative would eliminate the impacts to additional historic resources associated with the long-term and campus-wide projects, including demolition of the Student Affairs building (Building M) and the majority of Gorton Quad. Therefore, this alternative would continue to result in significant and unavoidable impacts, but to a lesser extent than the project as fewer contributing historical resources would be impacted.

The No Project Alternative would result in less ground disturbance than the project but could still affect archaeological resources and human remains. As described in the project-level analysis in Section 3.4.4.2, the Building A Expansion and North Campus Athletic Fields project's ground disturbing activities in moderate archaeological sensitivity areas have the potential to affect unknown archaeological resources. Under this alternative, mitigation measure CUL-5 would apply to these near-term projects, which would reduce impacts to a level that is less than significant. The Performing Arts Center project would occur in a low archaeological sensitivity area and impacts would be less than significant without mitigation. While unanticipated, implementation of the near-term projects proposed under this alternative has the potential to disturb human remains due to ground disturbing activities. However, mitigation measure CUL-6 would reduce impacts to human remains to a level that is less than significant under this alternative, similar to the project. Overall, the severity of these less than significant impacts would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Geology and Soils (Paleontological Resources)

The No Project Alternative would result in less ground disturbance than the project but could still affect paleontological resources. As described in the project-level analysis in Section 3.6.4.6, ground disturbing activities required for the construction of the near-term projects proposed under this alternative would occur in high paleontological sensitivity areas and could therefore result in the disturbance of

paleontological resources. Mitigation measures GEO-1 and GEO-4 would continue to apply to construction of the near-term projects under this alternative and, depending on the results of initial project review in mitigation measure GEO-1, mitigation measures GEO-2 and GEO-3 may also be required. Under this alternative, these mitigation measures would reduce impacts to paleontological resources to a level that is less than significant. Overall, the severity of impacts to paleontological resources would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Hazards and Hazardous Materials (Emergency Response and Evacuation Plans)

As described in the project-level analysis in Section 3.8.4.6, during construction of the near-term projects under this alternative, work affecting City of San Diego (City) streets would be subject to a Traffic Control Plan prepared to the satisfaction of the City; however, as the preparation of a similar plan for on-campus circulation is not mandated by existing policies, on-campus construction could temporarily impair emergency access. However, implementation of mitigation measure TRA-1 under this alternative would continue to reduce impacts related to construction-period emergency access to a level that is less than significant. Once operational, each of these near-term projects would be incorporated into the City College campus evacuation plans and this alternative would not impair an adopted emergency response plan or emergency evacuation plan. Overall, less construction activity would occur under this alternative and the temporary effects to emergency access and public roadways during construction would be limited in duration and geographic extent compared to the project. Therefore, impacts to emergency response and evacuation plans would be reduced compared to the project.

Hydrology and Water Quality (Drainage Patterns, Inundation)

As only implementation of the near-term projects would occur under this alternative, the potentially significant program-level impacts that require implementation of mitigation measure HYD-1 for FMP projects located within the area designated as a Special Flood Hazard Area would be avoided. As described in Sections 3.9.4.3 and 3.9.4.4, if development is proposed within the area designated as a floodplain (refer to Figure 3.9-1), a development project could result in flood flow alterations or in a risk of the release of pollutants within a flood hazard zone. However, as described in the project-level analysis, the near-term projects proposed under this alternative would not be constructed within the floodplain area that occurs in the southeastern portion of campus. Therefore, this alternative would not redirect flood flows or risk the release of pollutants within a flood hazard zone, and impacts would remain less than significant with no mitigation required. Overall, the No Project Alternative would result in reduced impacts related to floodplain drainage change impacts compared to the project.

Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration)

The No Project Alternative would result in less intensive impacts related to increases in ambient noise levels compared to the project, as the amount of construction would be reduced and the exterior amphitheater project would not be constructed. As described in the project-level analysis in Section 3.11.4.1, construction of the Building A Expansion and Performing Arts Center projects under this alternative could generate a substantial temporary increase in ambient noise levels and mitigation measure NOI-1 would continue to apply to reduce construction noise impacts to a level that is less than significant. Operational impacts associated with the Building A Expansion and North Campus Athletic Fields projects would continue to be less than significant while the Performing Arts Center project would require implementation of mitigation measure NOI-3 to reduce noise levels during operation of heating, ventilation, and air conditioning (HVAC) systems. As the future exterior amphitheater would not be

constructed under this alternative, no associated impact would occur and mitigation measure NOI-2 would not be required. Overall, noise impacts would be reduced compared to those identified for the project.

Similar to noise, ground-borne vibration under this alternative would be reduced with the lesser amount of construction but would not be avoided. As described in Section 3.11.4.2, construction of the Building A Expansion and Performing Arts Center projects under this alternative could temporarily generate excessive vibration at sensitive on-campus buildings. Mitigation measure NOI-4 would also be implemented for these projects under the No Project Alternative and would reduce construction vibration impacts to a level that is less than significant, similar to the project. Once operational, this alternative would result in less than significant vibration impacts. Vibration impacts would be similar to those identified for the project but reduced in duration and extent as there would be less construction compared to the project.

Transportation (Emergency Access)

Implementation of the near-term projects under this alternative would not cause permanent changes to City roadways that would result in inadequate emergency access but, as described in the analysis of hazards above, could result in temporary changes to emergency access within campus and on adjacent City roadways during construction. While temporary work affecting City streets would be subject to a Traffic Control Plan prepared to maintain emergency access, the preparation of a similar plan for on-campus circulation is not mandated by existing policies. Therefore, on-campus construction could temporarily impair emergency access, and this alternative would also implement mitigation measure TRA-1 to reduce impacts related to construction-period emergency access to a level that is less than significant. Overall, temporary effects to emergency access and public roadways during construction would be limited in duration and geographic extent compared to the project, and impacts related to emergency access would be reduced compared to the project.

Tribal Cultural Resources (Tribal Cultural Resources)

The No Project Alternative would result in less ground disturbance and a reduced likelihood of inadvertently encountering previously unknown tribal cultural resources compared to the project but could still affect tribal cultural resources. As described in the project-level analysis in Section 3.16.4.1, the ground disturbing activities associated with implementation of the Building A Expansion and North Campus Athletic Fields projects would occur in moderate archaeological sensitivity areas and have the potential to affect tribal cultural resources, including human remains. The Performing Arts Center project's ground disturbing activities would occur in a low archaeological sensitivity area. Mitigation measure CUL-5 would continue to apply to construction in moderate archaeological sensitivity areas and CUL-6 would continue to apply for all construction activity involving ground disturbance under this alternative. Implementation of these mitigation measures would reduce impacts to tribal cultural resources to a level that is less than significant, similar to the project. Overall, the severity of potential impacts would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Wildfire (Emergency Plans)

Implementation of the near-term projects under this alternative would not cause permanent changes to emergency plans but could result in temporary changes to emergency access within campus and on adjacent City roadways during construction, though less construction would occur than for the project.

As described in the project-level analysis in Section 3.18.4.1, temporary work affecting City streets would be subject to a Traffic Control Plan prepared to the satisfaction of the City; however, the preparation of a similar plan for on-campus circulation is not mandated by existing policies. With implementation of mitigation measure TRA-1, impacts related to on-campus construction-period emergency access would also be less than significant under the No Project Alternative, similar to the project. Operation of this alternative would not impair an adopted emergency response plan or emergency evacuation plan and no mitigation would be required. Overall, temporary effects related to implementation of emergency plans during construction would be limited in duration and geographic extent compared to the project, and impacts would be reduced.

6.5.1.2 Ability to Accomplish Project Objectives

The No Project Alternative would make progress towards many of the Project Objectives but would not fulfill these objectives to the same extent as the project. Focusing only on the near-term projects and other minor campus improvements under this alternative would conflict with project objectives to accommodate student growth and provide upgraded facilities in seismically appropriate locations on campus (Project Objectives 1, 5, and 6). In developing the projects in the FMP, the Facilities Condition Index (FCI; ratio of deferred maintenance dollars to replacement dollars) of existing buildings was considered. The majority of campus buildings proposed for replacement under the FMP have FCI ratios greater than 30 percent, which indicates the cost to renovate or complete maintenance would be very high in comparison with the cost of replacement or major renovation. Therefore, this alternative would also likely be less cost-efficient than the project over the life of campus buildings. Two of the near-term projects (Building A Expansion and Performing Arts Center) would contribute to achieving Project Objective 5 by developing new campus facilities for programs currently relying upon facilities rated "Poor" or "Critical" on the FCI; however, this objective would not be fully achieved as the long-term projects replacing buildings currently rated "Poor" or "Critical" would not be constructed. In addition, the majority of campus buildings appropriate for retrofitting have had renovations focused on seismic safety and energy efficiency completed in the recent past. Therefore, the benefits of these types of major renovations have largely been realized for existing campus buildings, except for Building M which is planned for demolition with the project but would not be replaced under this alternative.

Although implementation of the near-term projects would still allow the District to partially achieve the educational, facility, and community building goals outlined in Project Objectives 2, 3, 4, 7, and 8 under this alternative, they would each be achieved to a lesser extent as the strategic vision of the FMP would not be fully realized and implemented. The ability for students to enroll in on-campus courses, especially those that incorporate hands-on and technical education using District resources, could be limited by existing facility or capacity limitations. Project Objective 7 would only be partially achieved under this alternative, as the wayfinding features and safe pedestrian routes would be implemented under the No Project Alternative, but sufficient parking for the campus population would not be achieved with the exclusion of the long-term projects, which include additional parking structures. Project Objectives 9 and 10 would be achieved for the near-term projects as the District would implement sustainability features and minimize the loss of instructional space during construction of these projects; however, the full benefits of sustainability improvements associated with new construction replacing additional aging buildings in the long-term would not be realized.

In summary, this alternative would accomplish one objective (Project Objective 10), partially fulfill seven objectives (Project Objectives 2 through 5 and 7 through 9), and not achieve two objectives (Project Objectives 1 and 6).

6.5.2 Historic District Preservation Alternative

The Historic District Preservation Alternative would not include alterations to the San Diego City College Campus Expansion Historic District and its contributing resources identified as having the potential to be affected by future projects under the FMP (refer to Section 3.4, *Cultural Resources*). The five contributing buildings for the historic district are: the Creative Arts building (Building C), Saville Theatre, Building D, Academic Success Center (Building L), and Facilities & Student Affairs (Building M). The three contributing structures/plazas are the pedestrian stairs and walkway leading to Building C, Curran Plaza, and Gorton Quad. Repairs to these resources that maintain the integrity of the historic district and its character-defining features could continue.

Avoidance of the contributing resources to the San Diego City College Campus Expansion Historic District would exclude the Building A Expansion and Performing Arts Center projects in the near-term and the projects within Gorton Quad in the long-term (East Village Middle College High School and Maintenance/Operations and Seeds@City Buildings). While elimination of these two near-term projects was considered infeasible for the purposes of the No Project Alternative, it is assumed that for the purposes of protecting historic resources the District could decide that the Measure HH bond funds would instead be used for other FMP projects listed in the bond measure that are currently unfunded (Instruction and Fitness Center; Parking Structure and Tennis Courts; Classroom, Office, and Parking Structure; Faculty Office Addition; Parking Structure, Student Café, and Student Commons; and Amphitheater). The Parking Structure, Student Café, and Student Commons project proposed in the Library and Arts district of campus would be adjacent to the Creative Arts and Saville Theatre (Building C) and may require a shift in footprint or other alterations to avoid impacts to these resources but is assumed to continue as a long-term project for the purpose of this alternative. The remaining improvements total approximately 195,800 GSF of new construction and 16,698 GSF of demolition, resulting in a net increase of 179,102 GSF of campus building space compared to a net increase of 218,538 GSF (366,800 GSF of new construction and 148,262 GSF of demolition of existing buildings) anticipated with the project. Under this alternative, the total parking spaces created and on-campus student enrollment growth could remain the same as proposed with the project.

6.5.2.1 Impact Analysis

Aesthetics (Light and Glare)

Under the Historic District Preservation Alternative, the contributing resources to the San Diego City College Campus Expansion Historic District would be avoided and other projects identified in the FMP would be constructed instead. Temporary light and glare impacts associated with construction would remain less than significant under this alternative as construction lighting, if necessary, would be temporary and short-term. However, once operational, there is the potential for sources of light and glare generated by the projects implemented under this alternative, like the project, to result in light spillover or create new sources of glare that affect adjacent land uses, and mitigation measures AES-1 and AES-2 would be required to reduce these impacts to below a level of significance. Overall, impacts would be similar but reduced compared to those identified for the project due to the reduction in new sources of light and glare.

Biological Resources (Special-Status Species)

As this alternative would avoid the contributing resources to the San Diego City College Campus Expansion Historic District but would still involve construction and demolition activity in other locations

on campus, potential impacts to nesting raptors and birds would occur in a similar manner as the project. As discussed further in Section 3.3.4.1, the project could result in direct impacts to an active Cooper's hawk nest or nesting birds and raptors protected under the MBTA and CFG Code, while nesting raptors may also be susceptible to indirect impacts associated with noise from construction activity within 500 feet of an active nest. As such, similar to the project, this alternative would require implementation of mitigation measures BIO-1 and BIO-2, which would reduce impacts to a level that is less than significant. Impacts would be similar to those identified for the project but would be reduced compared to the project due to the reduction in construction activity.

Cultural Resources (Historic Resources, Archaeological Resources, Human Remains)

As discussed in Section 3.4.4.1, the San Diego City College Campus Expansion Historic District is considered a historical resource under CEQA. As such, alteration, demolition, or incompatible development involving the buildings and structures in the historic district could result in substantial adverse changes to a historical resource. However, the Historic District Preservation Alternative would not include alterations to character-defining features of the San Diego City College Campus Expansion Historic District and its contributing resources. Maintenance and repairs that maintain the integrity and character-defining features of the historic district and its contributing resources would not result in significant impacts to these resources. Therefore, this alternative would not result in the loss of a contributing building to a historic district or affect the integrity of the historic district and would not conflict with the Secretary of the Interior's Standards for the Treatment of Historic Properties. As such, this alternative would result in less than significant impacts to historic resources and no mitigation would be required. Under this alternative, the significant and unavoidable impact associated with the project would be avoided, and impacts to historic resources would instead be less than significant, representing a reduced impact compared to the project.

While the locations of construction would be adjusted under this alternative, ground disturbance within areas of moderate archaeological sensitivity would continue to have the potential to affect archaeological resources. Ground disturbance could also result in disturbance of human remains. Under this alternative, avoidance of the contributing resources to the San Diego City College Campus Expansion Historic District would exclude the Building A Expansion and Performing Arts Center projects in the near-term and the projects within Gorton Quad in the long-term. As shown on Figure 3.4-1, the Building A Expansion project and portions of Gorton Quad occur within a moderate sensitivity area, while the Performing Arts Center project would be underlain by a low sensitivity area. As this alternative would still involve ground disturbing activity on the campus in moderate archaeological sensitivity areas, the cultural resources monitoring program outlined in mitigation measure CUL-5 would be implemented in a similar manner to the project. Similarly, mitigation measure CUL-6 would be implemented for all projects to reduce impacts to human remains below a level of significance. Impacts to archaeological resources and human remains would be reduced to below a level of significance with mitigation. Overall, the severity of potential impacts would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Geology and Soils (Paleontological Resources)

This alternative would avoid demolition of the contributing resources to the San Diego City College Campus Expansion Historic District but would still involve ground disturbing activity on other locations on campus that are mapped as high paleontological sensitivity areas. Therefore, potential impacts to paleontological resources would occur in a similar manner to the project. As the entirety of the campus

is mapped as high paleontological sensitivity, the projects which would be constructed under the Historical District Preservation Alternative would be required to implement mitigation measures GEO-1 through GEO-4, as applicable. These measures would reduce impacts to paleontological resources under this alternative below a level of significance. Overall, the severity of impacts to paleontological resources would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Hazards and Hazardous Materials (Emergency Response and Evacuation Plans)

As this alternative would avoid the contributing resources to the San Diego City College Campus Expansion Historic District but would still involve construction and demolition activity in other locations on campus, this alternative could also interfere with emergency access within campus. As discussed in Section 3.8.4.6, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan but could interfere with emergency access to campus through construction-period road closures on campus. Similar to the project, construction under this alternative would be required to comply with mitigation measure TRA-1 to maintain on-campus emergency access, which would reduce potential impacts below a level of significance. Overall, less construction activity would occur under this alternative and the temporary effects to emergency access and public roadways during construction would be limited in duration and geographic extent compared to the project. Therefore, impacts to emergency response and evacuation plans would be reduced compared to the project.

Hydrology and Water Quality (Drainage Patterns, Inundation)

Although the area of campus designated as a floodplain (refer to Figure 3.9-1) is not proposed for specific near-term or long-term development projects under the FMP, including the unfunded projects that could be constructed under this alternative, should the District undertake additional development or redevelopment within this floodplain area, such work could impede or redirect flood flows, or result in a risk of the release of pollutants within a flood hazard zone. If development is proposed within the area designated as a Special Flood Hazard Area, both the project and the Historic District Preservation Alternative would be required to implement mitigation measure HYD-1 to reduce impacts below a level of significance. Overall, impacts would be similar to those identified for the project.

Noise (Increase in Ambient Noise Levels, Ground-Borne Vibration)

While development under the Historic District Avoidance Alternative would occur in different locations on campus compared to the project, the potential to generate noise and vibration during construction exceeding applicable thresholds would remain. As discussed in Section 3.11.4.1, the project could generate a substantial temporary increase in ambient noise levels during construction within 185 feet of a noise-sensitive land use (NSLU), or within the distances identified in Table 3.11-6 for specific activities. Construction could also result in the generation of excessive ground-borne vibration at vibration-sensitive locations on and surrounding the campus. Mitigation measure NOI-1 would be required to reduce construction period noise and mitigation measure NOI-4 would be required to avoid significant vibration during construction. With implementation of these mitigation measures, construction period noise and vibration impacts would be reduced below a level of significance. Impacts would be similar to those identified for the project but reduced in duration and extent due to less construction and development compared to the project.

Once operational, similar sources of noise to the project would result under this alternative, including stationary equipment and outdoor amplification sources. This alternative would not alter vehicular

traffic volumes and traffic noise impacts would remain less than significant. However, development projects would require new mechanical equipment that could generate noise levels in excess of the applicable thresholds. Consistent with the project, this alternative would be required to implement mitigation measures NOI-2 and NOI-3 to assess proposed equipment and identify site-specific design features, if needed, to reduce noise levels at neighboring uses. Overall, impacts would be less than significant with mitigation and reduced compared to the project.

Transportation (Emergency Access)

As the Historic District Preservation Alternative would avoid the contributing resources to the San Diego City College Campus Expansion Historic District but would still involve construction and demolition activity on other locations on campus, this alternative could also interfere with on-campus emergency access during construction. The District would be required to implement mitigation measure TRA-1 to reduce impacts to below a level of significance, similar to the project. The individual developments proposed under this alternative would be required to provide or maintain adequate emergency access in accordance with building code requirements, including those that address fire truck lanes, hose pull distances, and security systems, and operational impacts would remain less than significant. Overall, temporary effects to emergency access and public roadways during construction would be limited in duration and geographic extent compared to the project, and impacts related to emergency access would be reduced compared to the project.

Tribal Cultural Resources (Tribal Cultural Resources)

The Historic District Preservation Alternative would result in less ground disturbance and a reduced likelihood of inadvertently encountering previously unknown tribal cultural resources compared to the project; however, it would still involve ground-disturbing activities on the campus in areas identified as moderate archaeological resource sensitivity and would have the potential to affect tribal cultural resources, including archaeological sites, traditional gathering areas, or other areas of traditional use. Mitigation measure CUL-5 would apply to projects requiring ground disturbance in moderate sensitivity areas (see Figure 3.4-1) and mitigation measure CUL-6 would apply to all projects in the event human remains are encountered. This mitigation framework would reduce impacts to below a level of significance, consistent with the project. Overall, the severity of potential impacts would be reduced compared to the project due to reduced levels of ground disturbance and potential for inadvertent discoveries.

Wildfire (Emergency Plans)

As this alternative would avoid the contributing resources to the San Diego City College Campus Expansion Historic District but would still involve construction and demolition activity in other locations on campus, impacts related to construction-period road closures on campus would also be significant prior to mitigation. As discussed in Section 3.18.4.1, implementation of the FMP would not substantially impair an adopted emergency response plan or emergency evacuation plan, which would remain the case under this alternative. To address the potential to interfere with emergency access through construction-period road closures on campus, the Historic District Preservation Alternative would also implement mitigation measure TRA-1 to reduce impacts to a level that is less than significant. Overall, temporary effects related to implementation of emergency plans during construction would be limited in duration and geographic extent compared to the project, and impacts would be reduced.

6.5.2.2 Ability to Accomplish Project Objectives

As discussed above, the Historic District Preservation Alternative would not include alterations to the San Diego City College Campus Expansion Historic District and its contributing resources, which include the Creative Arts building (Building C), Saville Theatre, Building D, Academic Success Center (Building L), Facilities & Student Affairs (Building M), the pedestrian stairs and walkway leading to Building C, Curran Plaza, and Gorton Quad. This alternative would exclude the Building A Expansion and Performing Arts Center projects in the near-term and the projects within Gorton Quad in the long-term. However, the bond funds obligated to be used for the purposes listed under Measure HH could instead be used for other FMP projects listed in the bond measure that are currently unfunded.

This alternative would achieve Project Objectives 7, 9, and 10, as wayfinding features, safe pedestrian routes, and sufficient parking would still be provided, sustainability features would continue to be provided in new facilities, and instructional space interruptions would be minimized as feasible. However, this alternative would not achieve Project Objective 5, as many of the buildings located in the San Diego City College Campus Expansion Historic District (Building C, Saville Theatre, Building D, Building L, and Building M) are identified as Poor or Critical on the FCI. In addition, not including alterations to these facilities would conflict with project objectives to accommodate student growth (Project Objective 1). This alternative would not achieve Project Objective 6, as Building M, which is currently located within a fault zone buffer, would not be demolished and relocated, and the alternative would therefore not be able to reconstruct campus facilities outside of fault setbacks. Although this alternative would allow the District to make progress towards the educational, facility, and community building goals outlined in Project Objectives 2, 3, 4, and 8 through continued programming improvements under this alternative, they would each be achieved to a lesser extent as the strategic vision of the FMP would not be fully realized and implemented. In summary, this alternative would accomplish three objectives (Project Objectives 7, 9, and 10), partially fulfill four objectives (Project Objectives 2, 3, 4, and 8), and not achieve three objectives (Project Objectives 1, 5, and 6).

6.6 Environmentally Superior Alternative

An EIR is required to identify an environmentally superior alternative among the alternatives analyzed. The environmentally superior alternative is typically the alternative having the fewest significant environmental impacts or having the greatest ability to avoid or substantially reduce significant environmental impacts associated with the project. If the No Project Alternative is identified as the environmentally superior alternative, CEQA Guidelines Section 15126.6(e)(2) also requires that the EIR identify an environmentally superior alternative among the other alternatives.

Based on a comparison of the overall environmental impacts for the described alternatives (refer to Table 6-1), the Historic District Preservation Alternative is identified as the Environmentally Superior Alternative. The Historic District Preservation Alternative would eliminate the project's significant and unavoidable impacts associated with historic resources. The significant but mitigated impact related to hydrology and water quality would remain similar to the impact of the project while the severity of the remaining impacts that were determined to be less than significant with mitigation under this alternative would be reduced compared to the impacts of the project due to the reduction in construction. Out of the ten stated objectives, the Historic District Preservation Alternative would be able to fulfill three objectives, partially fulfill four objectives, and not fulfill three objectives.

7.0 PEIR PREPARERS

7.1 Lead Agency

San Diego Community College District
Lance Lareau, District Architect
Benjamin Baker, Assistant District Architect
Emily Perez, Assistant District Architect
Tiffany Barraza, Contract Senior Project Manager

7.2 Program Environmental Impact Report Consultant

HELIX Environmental Planning, Inc.
Yara Fisher, AICP, Project Manager
Shelby Bocks, Assistant Project Manager
Sydney Wells, Environmental Planner
Luis Cabrera Medina, Environmental Planner
Aaron Brownwood, Senior Environmental Planner
Joanne Dramko, AICP, Principal Planner
Mika Leslie, GIS Specialist
Shawna Krystek, Technical Editor

7.3 Technical Report Consultants

Air Quality and Greenhouse Gas Emissions Technical Report

HELIX Environmental Planning, Inc.
Victor Ortiz, Principal Air Quality Specialist
Sydney Wells, Air Quality Specialist
Shelby Bocks, Assistant Project Manager, Air Quality Specialist
Yara Fisher, AICP, Project Manager

Archaeological Technical Report

HELIX Environmental Planning, Inc.
James Turner, M.A., RPA, Senior Archaeologist
Theodore G. Cooley, M.A., RPA,
Shelby Castells, M.A., RPA,
Yara Fisher, AICP, Project Manager
Shelby Bocks, Assistant Project Manager

Biological Resources Technical Report

HELIX Environmental Planning, Inc.
Laura Moreton, Senior Scientist
Lindsay Willrick, Senior Biologist
Beth Ehsan, Principal Biologist

Linda Garcia, Technical Editor
Sean Bohac, GIS Specialist
Yara Fisher, AICP, Project Manager
Shelby Bocks, Assistant Project Manager

Geology and Soils Technical Study

Ninyo & Moore
Nissa M. Moreton, PG, CEG, Senior Project Geologist
Jeffrey T. Kent, PE, GE, Principal Engineer

Historic Resources Survey Report

HELIX Environmental Planning
Nelson White, M.S., Senior Architectural Historian
Teri Delcamp, M.A., Senior Architectural Historian
Thea De Armond, Ph.D., Senior Historian
James Turner, M.A., Senior Archaeologist
Yara Fisher, AICP, Project Manager
Shelby Bocks, Assistant Project Manager

Vehicle Miles Traveled Analysis

Linscott, Law & Greenspan, Engineers
Amelia Giacalone, Senior Transportation Planner
Zahira Chayeb, Transportation Engineer II
John Boarman, PE, Principal

Noise Technical Report

HELIX Environmental Planning
Joanne Dramko, AICP, Principal Technical Specialist
Jason Runyan, Senior Noise Specialist
Sydney Wells, Noise Specialist
Shelby Bocks, Assistant Project Manager, Noise Specialist
Yara Fisher, AICP, Project Manager

Paleontological Resources Technical Report

San Diego Natural History Museum Department of PaleoServices
Zev Brook, M.S., Paleontological Report Writer
Katie M. McComas, M.S., Senior Paleontologist
Thomas A. Deméré, Ph.D., Principal Paleontologist

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This section identifies sources relied upon for the environmental analysis in this PEIR. References are grouped by PEIR section and correspond to the in-text references provided in those sections of the PEIR.

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