

SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

Board Members

C. April Boling
Chairman

Catherine Blakespear
Greg Cox
Mark Kersey
Robert T. Lloyd
Paul McNamara
Paul Robinson
Johanna S. Schiavoni
Mark B. West

AIRPORT LAND USE COMMISSION AGENDA

Thursday, September 3, 2020
9:00 AM or immediately following the Board Meeting

San Diego International Airport
SDCRAA Administration Building
Board Room
3225 N. Harbor Drive
San Diego, California 92101

Ex-Officio Board Members

Gustavo Dallarda
Col. Charles B. Dockery
Gayle Miller

President / CEO

Kimberly J. Becker

This meeting of the Board of the San Diego County Regional Airport Authority Board will be conducted pursuant to the provisions of California Executive Order N-29-20 which suspends certain requirements of the Ralph M. Brown Act. During the current State of Emergency and in the interest of public health, all Board members will be participating in the meeting electronically. In accordance with the Executive Order, there will be no members of the public in attendance at the Board Meeting. We are providing alternatives to in-person attendance for viewing and participating in the meeting. In lieu of in-person attendance, members of the public may submit their comments in the following manner.

Comment on Non-Agenda Items

Public comments on non-agenda items must be submitted to the Authority Clerk at clerk@san.org, no later than 4:00 p.m. the day prior to the posted meeting in order to be eligible to be read into the record. The Authority Clerk will read the first 30 comments received by 4:00 p.m. the day prior to the meeting into the record. The maximum number of comments to be read into the record on a single issue will be 16. All other comments submitted, including those received after 4:00 p.m. the day prior and before 8:00 a.m. the day of the meeting, will be provided to the Authority Board and submitted into the written record for the meeting.

Public comments on agenda items received no later than 8:00 a.m. on the day of the meeting will be distributed to the Board and included in the record.

Comment on Agenda Items

If you'd like to speak to the Board live during the meeting, please follow these steps to request to speak:

- **Step 1:** Fill out the online [Request to Speak Form](#) to speak during the meeting via teleconference. The form must be submitted by 4 p.m. the day before the meeting or by 4:00 p.m. the Friday before a Monday meeting. After completing the form, you'll get instructions on how to call in to the meeting.

- **Step 2:** Watch the meeting via the Webcast located at the following link, <https://stream1.sdcoe.net/wc/sdcraa090320/>
- **Step 3:** When the Board begins to discuss the agenda item you want to comment on, call in to the conference line, you will be placed in a waiting area. **Please do not call until the item you want to comment on is being discussed.**
- **Step 4:** When it is time for public comments on the item you want to comment on, Authority Clerk staff will invite you into the meeting and unmute your phone. Staff will then ask you to state your name and begin your comments.

You may also view the meeting online at the following link: <https://www.san.org/Airport-Authority/Meetings-Agendas/ALUC>

REQUESTS FOR ACCESSIBILITY MODIFICATIONS OR ACCOMMODATIONS

As required by the Americans with Disabilities Act (ADA), requests for agenda information to be made available in alternative formats, and any requests for disability-related modifications or accommodations required to facilitate meeting participation, including requests for alternatives to observing meetings and offering public comment as noted above, may be made by contacting the Authority Clerk at (619) 400-2550 or <mailto:clerk@san.org>. The Authority is committed to resolving accessibility requests swiftly in order to maximize accessibility.

Pursuant to California Public Utilities Code §§ 21670-21679.5, the Airport Land Use Commission ("Commission") is responsible for coordinating the airport planning of public agencies within San Diego County. The Commission has the legal responsibility to formulate airport land use compatibility plans ("ALUCPs") that will (a) provide for the orderly growth of each public airport and the areas surrounding the airport within the County and (b) safeguard the general welfare of the inhabitants within the vicinity of each airport and the public in general. Pursuant to §21670.3, the San Diego County Regional Airport Authority serves as the Commission.

This Agenda contains a brief general description of each item to be considered. The indication of a recommended action does not indicate what action (if any) may be taken. **Please note that agenda items may be taken out of order.** If comments are made to the Board without prior notice or are not listed on the Agenda, no specific answers or responses should be expected at this meeting pursuant to State law.

Staff Reports and documentation relating to each item of business on the Agenda are on file in Board Services and are available for public inspection.

NOTE: Pursuant to Authority Code Section 2.15, all Lobbyists shall register as an Authority Lobbyist with the Authority Clerk within ten (10) days of qualifying as a lobbyist. A qualifying lobbyist is any individual who receives \$100 or more in any calendar month to lobby any Board Member or employee of the Authority for the purpose of influencing any action of the Authority. To obtain Lobbyist Registration Statement Forms, contact the Board Services/Authority Clerk Department.

CALL TO ORDER:

ROLL CALL:

NON-AGENDA PUBLIC COMMENT:

Non-Agenda Public Comment is reserved for members of the public wishing to address the Commission on matters for which another opportunity to speak **is not provided on the Agenda**, and which is within the jurisdiction of the Commission. Please submit a completed speaker slip to the Authority Clerk. ***Each individual speaker is limited to three (3) minutes. Applicants, groups and jurisdictions referring items to the Board for action are limited to five (5) minutes.***

Note: Persons wishing to speak on specific items should reserve their comments until the specific item is taken up by the Commission.

CONSENT AGENDA (Items 1-2):

The Consent Agenda contains items that are routine in nature and non-controversial. It also contains consistency determinations that have been deemed consistent or conditionally consistent. The matters listed under 'Consent Agenda' may be approved by one motion. Any Commission Member may remove an item for separate consideration. Items so removed will be heard before the scheduled New Business items, unless otherwise directed by the Chair.

1. APPROVAL OF MINUTES:

RECOMMENDATION: Approve the minutes of the July 9, 2020 regular meeting.

CONSISTENCY DETERMINATIONS

2. REPORT OF DETERMINATIONS OF CONSISTENCY WITH AIRPORT LAND USE COMPATIBILITY PLANS: SAN DIEGO INTERNATIONAL AIRPORT 2183 BACON STREET, CITY OF SAN DIEGO, 2816 BAYSIDE WALK, CITY OF SAN DIEGO, 2001 4TH AVENUE, CITY OF SAN DIEGO AND 2455 CUSHING ROAD, CITY OF SAN DIEGO; MARINE CORPS AIR STATION MIRAMAR 9255 CAMINO SANTA FE, CITY OF SAN DIEGO:

RECOMMENDATION: Receive the report.

(Planning & Environmental Affairs: Ralph Redman)

PUBLIC HEARINGS:

**3. CERTIFICATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE
NAVAL AIR STATION NORTH ISLAND AIRPORT LAND USE
COMPATIBILITY PLAN:**

RECOMMENDATION: Adopt Resolution No. 2020-0001 ALUC, certifying the Final Environmental Impact Report for the Naval Air Station North Island Airport Land Use Compatibility Plan and adopting a California Environmental Quality Act (CEQA) Findings of Fact, a Statement of Overriding Considerations and a Mitigation Monitoring and Reporting Program.

(Planning & Environmental Affairs: Ralph Redman)

OLD BUSINESS:

NEW BUSINESS:

**4. ADOPTION OF THE NAVAL AIR STATION NORTH ISLAND AIRPORT LAND
USE COMPATIBILITY PLAN:**

RECOMMENDATION: Adopt Resolution No. 2020-0002 ALUC, adopting the Airport Land Use Compatibility Plan for Naval Air Station North Island.

(Planning & Environmental Affairs: Ralph Redman)

COMMISSION COMMENT:

ADJOURNMENT:

Policy for Public Participation in Board, Airport Land Use Commission (ALUC), and Committee Meetings (Public Comment)

- 1) Persons wishing to address the Board, ALUC, and Committees shall complete a “Request to Speak” form prior to the initiation of the portion of the agenda containing the item to be addressed (e.g., Public Comment and General Items). Failure to complete a form shall not preclude testimony, if permission to address the Board is granted by the Chair.
- 2) The Public Comment Section at the beginning of the agenda is reserved for persons wishing to address the Board, ALUC, and Committees on any matter for which another opportunity to speak is not provided on the Agenda, and on matters that are within the jurisdiction of the Board.
- 3) Persons wishing to speak on specific items listed on the agenda will be afforded an opportunity to speak during the presentation of individual items. Persons wishing to speak on specific items should reserve their comments until the specific item is taken up by the Board, ALUC and Committees.
- 4) If many persons have indicated a desire to address the Board, ALUC and Committees on the same issue, then the Chair may suggest that these persons consolidate their respective testimonies. Testimony by members of the public on any item shall be limited to **three (3) minutes per individual speaker and five (5) minutes for applicants, groups and referring jurisdictions.**
- 5) Pursuant to Authority Policy 1.33 (8), recognized groups must register with the Authority Clerk prior to the meeting.
- 6) After a public hearing or the public comment portion of the meeting has been closed, no person shall address the Board, ALUC, and Committees without first obtaining permission to do so.

Additional Meeting Information

NOTE: This information is available in alternative formats upon request. To request an Agenda in an alternative format, or to request a sign language or oral interpreter, or an Assistive Listening Device (ALD) for the meeting, please telephone the Authority Clerk’s Office at (619) 400-2400 at least three (3) working days prior to the meeting to ensure availability.

For your convenience, the agenda is also available to you on our website at www.san.org.

For those planning to attend the Board meeting, parking is available in the public parking lot located directly in front of the Administration Building. Bring your ticket to the third floor receptionist for validation.

You may also reach the SDCRAA Building by using public transit via the San Diego MTS System, Route 992. For route and fare information, please call the San Diego MTS at (619) 233-3004 or 511.

DRAFT
AIRPORT LAND USE COMMISSION
MINUTES
THURSDAY, JULY 9, 2020
SAN DIEGO INTERNATIONAL AIRPORT
BOARD ROOM

CALL TO ORDER: Chairman Boling called the meeting of the Airport Land Use Commission to order at 9:43 a.m. on Thursday, July 9, 2020, electronically and via teleconference pursuant to Executive Order N-29-20 at the San Diego International Airport, Administration Building, 3225 North Harbor Drive, San Diego, CA 92101.

ROLL CALL:

PRESENT: Commissioners: Blakespear, Boling, Dallarda (Ex-Officio), Dockery (Ex-Officio), Kersey, Lloyd, McNamara, Robinson, Schiavoni, West

ABSENT: Commissioners: Cox, Miller (Ex-Officio)

ALSO PRESENT: Kimberly J. Becker, President/CEO; Amy Gonzalez, General Counsel; Tony R. Russell, Director, Board Services/Authority Clerk; Martha Morales, Assistant Authority Clerk I

NON-AGENDA PUBLIC COMMENT: None.

CONSENT AGENDA (Items 1-2):

ACTION: Moved by Commissioner West and seconded by Commissioner Robinson to approve the Consent Agenda. Motion carried by the following votes: YES –Blakespear, Boling, Kersey, Lloyd, McNamara, Robinson, Schiavoni, West; NO – None; ABSENT – Cox; (Weighted Vote Points: YES – 92; NO – 0; ABSENT – 8)

1. APPROVAL OF MINUTES:

RECOMMENDATION: Approve the minutes of the June 4, 2020 regular meeting.

CONSISTENCY DETERMINATIONS

2. REPORT OF DETERMINATIONS OF CONSISTENCY WITH AIRPORT LAND USE COMPATIBILITY PLANS: SAN DIEGO INTERNATIONAL AIRPORT 4430 SARATOGA AVENUE, CITY OF SAN DIEGO; BROWN FIELD MUNICIPAL AIRPORT AMENDMENTS TO MUNICIPAL CODE FOR ACCESSORY AND JUNIOR ACCESSORY DWELLING UNITS, CITY OF CHULA VISTA; SAN DIEGO INTERNATIONAL AIRPORT, BROWN FIELD MUNICIPAL AIRPORT, GILLESPIE FIELD, MARINE CORPS AIR STATION MIRAMAR & MONTGOMERY-GIBBS EXECUTIVE AIRPORT GENERAL PLAN HOUSING ELEMENT UPDATE, 2021-29, CITY OF SAN DIEGO:

RECOMMENDATION: Receive the report.

PUBLIC HEARINGS: None.

OLD BUSINESS: None.

NEW BUSINESS: None.

COMMISSION COMMENT: None.

ADJOURNMENT: The meeting adjourned at 9:45 a.m.

APPROVED BY A MOTION OF THE AIRPORT LAND USE COMMISSION THIS 3RD DAY OF
SEPTEMBER, 2020.

ATTEST:

TONY R. RUSSELL
DIRECTOR, BOARD SERVICES /
AUTHORITY CLERK

APPROVED AS TO FORM:

AMY GONZALEZ
GENERAL COUNSEL

Airport Land Use Commission
Report of Determinations of Consistency with Airport Land
Use Compatibility Plans

Item No.
2

Meeting Date: **September 3, 2020**

Pursuant to Airport Authority Policy 8.30, and acting in its delegated capacity as the Airport Land Use Commission (ALUC) for San Diego County, Airport Authority staff has issued the following consistency determinations per their respective ALUCPs:

San Diego International Airport (SDIA) ALUCP

Construction of an Attached Residential Unit within an Existing Mixed-Use Building at 2183 Bacon Street, City of San Diego

Deemed Complete & Conditionally Consistent on June 23, 2020

Description of Project: The project involves the construction of one new, attached residential unit within an existing mixed-use building on a property of 9,148 square feet with two other existing buildings to remain unchanged.

Noise Contours: The proposed project lies within the 65-70 decibel Community Noise Equivalent Level (dB CNEL) noise exposure contour. The ALUCP identifies residential uses located within the 65-70 dB CNEL noise contour as conditionally compatible with airport uses, provided that the building is sound attenuated to 45 dB CNEL interior noise level. The ALUCP requires that an aviation easement for aircraft noise and height be recorded with the County Recorder. Therefore, as a condition of project approval, the building must be sound attenuated to 45 dB CNEL interior noise level and an aviation easement for aircraft noise and height be recorded with the County Recorder.

Airspace Protection Surfaces: No change is proposed in the height of the existing building.

Safety Zones: The proposed project is located outside all Safety Zones.

Overflight Notification: The proposed project is located within the overflight notification area. The ALUCP requires that a means of overflight notification be provided for new residential land uses. In instances when an aviation easement is required, the overflight notification requirement is satisfied.

Construction of a Detached Residential Unit at 2816 Bayside Walk, City of San Diego

Deemed Complete & Conditionally Consistent on July 28, 2020

Description of Project: The project involves the construction of a detached, three-story single family residence of 3,254 square feet on a property of 2,977 square feet.

Noise Contours: The proposed project lies within the 60-65 dB CNEL noise exposure contour. The ALUCP identifies residential uses located within the 60-65 dB CNEL noise contour as conditionally compatible with airport uses, provided that the building is sound attenuated to 45 dB CNEL interior noise level. Therefore, as a condition of project approval, the building must be sound attenuated to 45 dB CNEL interior noise level.

Airspace Protection Surfaces: The maximum height of the proposed project structure will be 35 feet above mean sea level. The proposed project is located outside the SDIA Threshold Siting Surface (TSS). The proposed project is in compliance with the ALUCP airspace protection surfaces because the project sponsor has certified that notice of construction is not required to the Federal Aviation Administration (FAA) because the project is located within an urbanized area, is substantially shielded by existing structures or natural terrain, and cannot reasonably have an adverse effect on air navigation.

Safety Zones: The proposed project is located outside all Safety Zones.

Overflight Notification: The proposed project is located within the overflight notification area. The ALUCP requires that a means of overflight notification be provided for new residential land uses. Therefore, as a condition of project approval, a means of overflight notification must be provided.

Establishment of 75 Attached Residential Units with Leasable Commercial Space in Three Existing Buildings at 2001 4th Avenue, City of San Diego

Deemed Complete & Conditionally Consistent on August 3, 2020

Description of Project: The project involves the establishment of 75 attached residential units and 1,063 square feet of leasable high-intensity service commercial space within three, adjacent, existing buildings of 68,667 square feet total and an existing surface parking area to remain on a 1.38-acre property.

Noise Contours: The project lies within the 75+ dB CNEL noise exposure contour. The ALUCP identifies residential and high-intensity service uses located within the 75+ dB CNEL noise contour as conditionally compatible with airport uses, provided that the residences are sound attenuated to 45 dB CNEL interior noise level and the service use is attenuated to 50 dB CNEL interior noise level. The ALUCP requires that an aviation easement for aircraft noise and height be recorded with the County Recorder.

Therefore, as conditions of project approval, the residences must be sound attenuated to 45 dB CNEL interior noise level, the service use must be sound attenuated to 50 dB CNEL interior noise level, and an aviation easement for aircraft noise and height must be recorded with the County Recorder.

Airspace Protection Surfaces: The proposed project is in compliance with the ALUCP airspace protection policies, including the SDIA TSS, because no increase in height is proposed to the existing buildings. The proposed project is located within an area where the natural terrain already penetrates Part 77 airspace surfaces but only interior improvements are proposed to the existing buildings with no further increases in the existing height.

Safety Zones: The project is located within Safety Zone 2 East – Uptown. The ALUCP identifies residential and high-intensity service uses located within Safety Zone 2 East – Uptown as conditionally compatible with airport uses, provided that the project complies with an intensity of 272 people per acre, which equates to a total of 376 people for the entire property of 1.38 acres. Only half of the site is being developed per the project description, and the remaining surface parking area is not part of the project under a municipal transit priority area waiver of parking requirements for the mixed-use development.

The ALUCP provides that for a project with a mixture of residential and nonresidential uses, a maximum of half of the people per acre may be in residential units, calculated at persons per household as specified in the ALUCP. The persons per household for Safety Zone 2 East – Uptown is 1.51, which yields a maximum of 124 residential units, and the project complies with 75 units proposed. The remaining nonresidential half of 188 people is limited to the occupancy factor for the applicable use. The project high-intensity service use of 1,063 square feet proposed equates to 18 people at 60 square feet per person per the ALUCP, and therefore does not exceed the 188 people limit.

Since the remaining surface parking area of the property is not part of the project, the 1.38-acre property has capacity for up to 49 residential units and 170 additional people in future redevelopment. Since the project does not consume the entire compatible density and intensity thresholds of the ALUCP for its property area, the entire property must be limited in density and intensity to the limits of the ALUCP as stated above. In order to assure that future uses of the property not part of the project abide with the ALUCP thresholds across the entire property, a recorded means restricting uses of the entire property to the ALUCP density and intensity limits must be applied.

Therefore, as a condition of project approval, a notice of restriction must be recorded with the County Recorder over the entire 1.38-acre property limiting its total occupancy to no greater than 376 people, with a maximum of those 376 people in no greater than 124 residential units.

Overflight Notification: The proposed project is located within the overflight notification area. The ALUCP requires that a means of overflight notification be provided for new residential land uses. In instances when an aviation easement is required, the overflight notification requirement is satisfied.

Establishment of Office and Adult Assembly within Existing Building at 2455 Cushing Road, City of San Diego

Deemed Complete & Conditionally Consistent on August 10, 2020

Description of Project: The project involves the establishment of an office and adult assembly use within an existing building of 19,651 square feet on a property of 44.23 acres.

Noise Contours: The proposed project lies within the 65-70 dB CNEL noise exposure contour. The ALUCP identifies office uses located within the 65-70 dB CNEL noise contour as compatible and adult assembly uses as conditionally compatible with airport uses, provided that the building is sound attenuated to 45 dB CNEL interior noise level and that an aviation easement for aircraft noise and height is recorded with the County Recorder. The ALUCP identifies children's assembly uses located within the 65-70 dB CNEL noise contour as incompatible with airport uses. Therefore, as a condition of project approval, the building must not allow children's assembly and must be sound attenuated to 45 dB CNEL interior noise level and an aviation easement for aircraft noise and height must be recorded with the County Recorder.

Airspace Protection Surfaces: No change is proposed in the height of the existing building.

Safety Zones: The proposed project is located outside all Safety Zones.

Overflight Notification: The proposed project is located within the overflight notification area, but does not involve any new residential use subject to overflight notification requirements.

Marine Corps Air Station (MCAS) Miramar ALUCP

Establishment of Community Plan Implementation Overlay Zone for Carroll Canyon Master Plan at 9255 Camino Santa Fe, City of San Diego

Deemed Complete & Conditionally Consistent on July 9, 2020

Description of Project: The project involves the establishment of a Community Plan Implementation Overlay Zone within the Carroll Canyon Master Plan area which would require discretionary permit review of future projects if the Master Plan Development Permit expired without being vested. The project does not change the Community Plan Amendment and Rezone that was determined to be conditionally consistent by the ALUC in 2018.

Noise Contours: The proposed project lies within the 60-65 and 65-70 dB CNEL noise exposure contour. The ALUCP identifies residential uses located within the 60-65 dB CNEL noise contour as conditionally compatible with airport uses, provided that the building is sound attenuated to 45 dB CNEL interior noise level, and the ALUCP identifies residential uses located with the 65-70 dB CNEL noise contour as being incompatible with airport uses.

The ALUCP identifies retail and commercial uses located with the 60-65 dB CNEL noise contour as compatible with airport uses, and retail and commercial uses located with the 65-70 dB CNEL noise contour as conditionally compatible with airport uses, provided that the building is sound attenuated to 50 dB CNEL interior noise level.

The ALUCP identifies park and open space uses located within the 60-65 and 65-70 dB CNEL noise contours as compatible with airport uses.

Therefore, as a condition of project approval, residences located in the 60-65 dB noise contour must be sound attenuated to 45 dB CNEL interior noise level, and retail and commercial uses located in the 65-70 dB noise contour must be sound attenuated to 50 dB CNEL interior noise level. Additionally, residences must not be located in the 65-70 dB CNEL noise contour.

Airspace Protection Surfaces: The maximum height of the proposed project structures will be 65 feet above mean sea level. The proposed project is in compliance with the ALUCP airspace protection surfaces because a determination of no hazard to air navigation has been issued by the FAA.

Safety Zones: The proposed project is located outside all Safety Zones.

Overflight Notification: The proposed project is located within the overflight notification area. The ALUCP requires that a means of overflight notification be provided for new residential land uses. Therefore, as a condition of project approval, a means of overflight notification must be provided for new residential land uses.

SAN DIEGO COUNTY
REGIONAL AIRPORT AUTHORITY
AIRPORT LAND USE COMMISSION

Item No.
3 & 4

STAFF REPORT

Meeting Date: **SEPTEMBER 3, 2020**

Subject:

Certification of an Environmental Impact Report for the Naval Air Station North Island Airport Land Use Compatibility Plan and Adoption of the Naval Air Station North Island Airport Land Use Compatibility Plan

Recommendation:

Adopt Resolution 2020-0001 ALUC, certifying the final Environmental Impact Report for the Naval Air Station North Island Airport Land Use Compatibility Plan and adopting California Environmental Quality Act Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program; and

Adopt Resolution 2020-0002 ALUC, adopting the Airport Land Use Compatibility Plan for Naval Air Station North Island.

Background/Justification:

Acting in its capacity as the ALUC, the Airport Authority is required to prepare and adopt an ALUCP for each public use and military airport within San Diego County, which includes Naval Air Station North Island (NASNI) (Pub. Util. Code §21674(c)).

The purpose of an ALUCP is to protect airport operations, including aircraft in flight, from encroachment by incompatible land uses with concurrent land use policies to minimize public exposure to excessive noise and safety hazards within areas around airports located in the county, “to the extent that the land in the vicinity of those airports is not already devoted to incompatible uses” (Pub. Util. Code §21674).

In preparing an ALUCP, the ALUC must be guided by the California Department of Transportation, Division of Aeronautics (Caltrans) *Airport Land Use Planning Handbook (Handbook)* (Pub. Util. Code, §21674.7(a)). Moreover, an ALUCP for military airports must also be consistent with the safety and noise compatibility standards in the *Air Installation Compatible Use Zone (AICUZ)* study for that airport (Pub. Util. Code §21675(b)). While the AICUZ includes noise and safety compatibility standards, the *Handbook* provides guidance to the ALUC for the protection of federally regulated airspace and notification to new residential property owners about the effects of aircraft overflight.

An ALUCP is usually based on forecasted operations in an Airport Master Plan (AMP) or an Airport Layout Plan (ALP) with concurrence by Caltrans (Pub. Util. Code §21675(a)). As a military installation, NASNI has no AMP or ALP; therefore, the proposed ALUCP has been prepared based upon the airfield diagram and operations as described in the 2011 AICUZ prepared by the U.S. Department of the Navy. The ALUC has received written concurrence from Caltrans that the ALUC is required to prepare an ALUCP for NASNI.

With concurrence from the Department of the Navy and Caltrans, staff has prepared the proposed ALUCP consistent with the Navy's 2011 AICUZ, the requirements of the State Aeronautics Act, and guidance from the *Handbook*. Detailed ALUCP compatibility policies and standards relative to future land uses specifically address noise contours, safety zones, airspace protection surfaces, and overflight notification areas. Appendices in the proposed ALUCP include supplemental, technical data regarding the current and proposed features of the airport, the existing environs, and the data and assumptions upon which the compatibility policies, standards, and affected area maps of the ALUCP are based.

The AICUZ for NASNI considers most land uses, including residential, commercial, and lodging facilities, located within its noise contours and safety zones to be incompatible with its operations. However, the AICUZ does acknowledge that the City of Coronado is "nearly completely developed" (AICUZ, p.6-8). Recognizing that redevelopment and infill are the most likely future development scenarios, the AICUZ states that local governments should "not take actions that would make an existing land use compatibility (or incompatibility) situation worse" (AICUZ, p. 7-3). This principle is the foundation of the proposed ALUCP compatibility policies.

Public Input/Outreach

California Public Utilities Code section 21675(c) requires the ALUC to engage in a public collaborative planning process to prepare an ALUCP. Consistent with these requirements, staff formed a Working Group, conducted community meetings, and consulted with and sought comments from the affected local agencies over a three-year period regarding the compatibility factors that establish the Airport Influence Area (AIA) and the corresponding policies and standards of the proposed ALUCP to facilitate implementation of the plan.

Staff has prepared the proposed ALUCP consistent with ALUC policy direction provided in November 2017 and input from numerous meetings of the Working Group. ALUC staff has solicited and received extensive input from public and private stakeholders on the development of ALUCP compatibility policies and criteria specific to NASNI. (Pub. Util. Code §§21670.3; 21675(b)). The proposed ALUCP is complete unto itself and is separate and independent from the ALUCPs prepared by the ALUC for the other airports located in San Diego County.

While 86% of the non-military incorporated land area comprising the City of Coronado is located outside of the AICUZ 65+ decibel Community Noise Equivalent Level (dB CNEL) noise contours and safety zones and the noise and safety zones in the ALUCP (which are identical to the AICUZ noise and safety zones), properties within the noise contours and safety zones are subject to ALUCP compatibility policies and standards (see inset on Figure 1). The Coronado City Council requested in November 2015 that the following constituencies be represented on the Working Group to draft ALUCP policies, which ALUC staff thereafter convened:

- | | |
|---|--|
| 1. Clear Zone (CZ) Property Owner | 6. Coronado Community Development Department |
| 2. Accident Potential Zone (APZ) I Residential Property Owner | 7. Coronado City Manager's Office |
| 3. APZ I Commercial Property Owner | 8. Coronado City Councilmember |
| 4. APZ II Property Owner | 9. Coronado Real Estate Association |
| 5. Hotel del Coronado | 10. Coronado Main Street |

- | | |
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| 11. Coronado Chamber of Commerce | 16. American Institute of Architects San Diego Chapter |
| 12. Coronado Tourism Improvement District (CTID) | 17. San Diego County Regional Airport Authority Board Member/ALUC Commissioner |
| 13. Coronado Port Commissioner | |
| 14. Coronado School District Board | |
| 15. Coronado Historical Association | |

Local agencies whose land use jurisdiction would be affected by the NASNI ALUCP were also invited to participate in the Working Group meetings and most regularly attended, including the cities of Coronado, Chula Vista, Imperial Beach, National City, and San Diego; the County of San Diego; and the San Diego Unified Port District.

Prior to each Working Group meeting, ALUC staff met with City of Coronado staff to review and receive feedback on each proposed meeting agenda and presentations. In order to keep the public informed of the ALUCP development process and Working Group proceedings, community meetings were held approximately one week after each Working Group meeting. Several meetings were also held with representatives from the Hotel del Coronado, a key stakeholder. In addition briefings were conducted with City of Coronado and various other elected officials and their staff representatives since the initiation of ALUCP preparation. The table below summarizes the outreach meetings held.

Meeting Type	Quantity
Working Group Meetings	12
Community Meetings	10
City of Coronado Staff Coordination Meetings/Briefings	19 (2 also included the Hotel del Coronado)
Hotel del Coronado Coordination Meetings	6 (2 also included City of Coronado staff)
Elected Official Briefings	14

The community meetings were hosted at public facilities in Coronado and were advertised with notices on the websites of both the *Coronado Times* and the *Coronado Eagle & Journal* prior to each meeting. A notice about the kick-off of the ALUCP public outreach process was mailed in March 2016 to over 3,000 owners and/or occupants with property in the AICUZ noise contours or safety zones, and another notice was again mailed in April 2016 to provide the schedule of confirmed community meeting dates. A notice was again mailed to over 3,000 owners and/or occupants in April 2019 to notify them about the May 6, 2019 environmental impact report (EIR) scoping meeting, in addition to the standard public notice process required under California Environmental Quality Act (CEQA).

Residents who attended a community meeting and requested to be notified by email of each subsequent community meeting were so notified by a continuously updated email distribution list. All community meeting presentation documents were posted on the Airport Authority website at www.san.org/nasni following each meeting. A dedicated email address of ALUCPcomments@san.org was advertised and maintained by ALUC staff to allow anyone to easily provide feedback and/or request information.

Public Input Results

As shown by the numerous meetings and public outreach efforts outlined above, the Draft NASNI ALUCP is the product of many years of collaboration with local agencies, key stakeholders, and the public. As previously noted, the AICUZ considers most land uses located within its noise contours and safety zones as incompatible. To acknowledge existing land uses and prevailing development patterns in the City of Coronado, while still being consistent with the AICUZ noise and safety standards for future land uses, significant modifications were made in the Draft ALUCP. Below is a summary of those modifications:

Proposed ALUCP Residential Policies:

- Allows expansion and reconstruction of existing residences in safety zones or construction of new single family homes on existing legal lots (as required by law)
- Allows new accessory dwelling units in safety zones
- Allows expansion and reconstruction of residences in the 65+ dB CNEL noise contour

Proposed ALUCP Nonresidential Policies:

- Allows numerous commercial uses (e.g., eating and drinking establishments, hotels, retail, professional services, etc.), which already exist within the safety zones but are incompatible with the AICUZ, to be remodeled and reconstructed as long as the gross floor area is not expanded
- Allows new development to be exempt from noise and safety policies if less than 50 percent of structure is located within a noise contour or safety zone

In addition, the following exemptions from ALUC review were developed as part of the Working Group process. All of these are subject to stipulations in order to be exempt from ALUC review per Table 3 in the proposed ALUCP:

- Existing land uses
- Uses with vested rights
- Alterations to existing residential and nonresidential uses
- Projects outside noise and safety zones within Airport Influence Area
- Unoccupied accessory structures
- Temporary uses and activities
- Resumption of a discontinued use

ALUCP Compatibility Maps, Policies, & Standards

Through the extensive public outreach process conducted with the City of Coronado, the Working Group, general public, and key stakeholders like the Hotel del Coronado, ALUC staff has developed ALUCP policies that provide for the redevelopment of existing land uses surrounding NASNI while generally avoiding actions that would make existing land use incompatibilities with the AICUZ “worse,” consistent with AICUZ policies.

At the November 2, 2017 ALUC meeting, staff requested direction from the ALUC regarding these ALUCP compatibility policies and standards. The ALUC concurred with the staff recommendations and provided direction to move forward with the development of the draft ALUCP per those policies and prepare the required environmental analysis consistent with CEQA.

The release of the Notice of Preparation (NOP) and Initial Study for the Draft EIR was delayed until the U.S. Department of the Navy had concluded its environmental review process under the National Environmental Policy Act (NEPA) for the proposed C2A to CMV-22B aircraft fleet transition. The delay was necessary to determine if the proposed aircraft fleet transition would require an update to the current AICUZ study. The Navy's Finding of No Significant Impact (FONSI), published on November 1, 2018, concluded that all proposed project alternatives would have no impact to the AICUZ program at NASNI and made no recommendations to update the study. After the Navy's issuance of the FONSI, ALUC staff moved forward with the development of the Initial Study for the draft ALUCP.

The following sections provide a brief discussion of the NASNI ALUCP's main components.

Airport Influence Area

The ALUCP establishes the Airport Influence Area (AIA) (Figure 1) as "the area in which current and projected future airport-related noise, safety, airspace protection, or overflight factors/layers may significantly affect land use or necessitate restrictions on land use" (Bus. & Prof. Code §11010(b)(13)(B)). The cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego; the County of San Diego; and the Unified Port of San Diego have been included in the NASNI outreach process because the AIA affects land within their jurisdictions, and consultation with affected agencies is required when establishing an AIA [Pub. Util. Code §21675(c)]. The AIA is the area within which State law requires the disclosure of airport proximity and effects of airport operations and aircraft in flight in real estate sales and rental transactions and the area within the jurisdiction of the ALUC.

Noise & Safety Compatibility Standards

Because the lands affected by the ALUCP noise contours and safety zones substantially overlap, the noise and safety compatibility factors for NASNI were combined into one compatibility map (Figure 2) and corresponding matrix (Table 1) for ease of implementation. Similar to other ALUCPs, new uses or the expansion of existing uses are defined as "compatible" (green), "conditionally compatible" (yellow), or "incompatible" (red) according to that use's location compared to the noise and safety standards in the compatibility matrix.

Standards for noise and safety compatibility apply to redevelopment and the reconstruction of, additions to, or changes in the use of existing residences and nonresidential buildings. The goals of the noise and safety compatibility standards are to:

- Limit new noise- and risk-sensitive uses within the noise contours and safety zones
- Ensure new noise-sensitive development meets interior sound level performance standards
- Avoid increasing the degree of existing land use incompatibility within the noise contours and safety zones

Airspace Protection

The airspace protection boundary establishes the geographic area in which airspace protection and flight safety policies and standards apply (Figure 3). The airspace boundary is based upon existing Federal Aviation Administration (FAA) requirements for airspace surfaces surrounding NASNI runways. The policies and standards protect NASNI airspace and flight safety by:

- Limiting the height of new structures and objects to prevent hazard penetrations of FAA airspace
- Preserving the operational ability of NASNI
- Limiting potential hazards to flight (e.g., glare, distracting lighting, bird attractants, etc.)

The airspace protection and flight safety policies and standards reinforce the need for sponsors of proposed land use projects to comply with Federal law that requires notice to the FAA for proposed construction or alteration of structures or objects exceeding certain heights or that could potentially interfere with airspace navigational aids.

Overflight Notification

The goal of the overflight compatibility factor is to provide notice to prospective buyers of new housing within the overflight boundary regarding the potential effects (noise, dust, vibration, fumes, etc.) of aircraft overflight (Figure 4). This factor does not place any restrictions on property and only applies to new residential units, including the complete reconstruction of existing dwelling units and accessory dwelling units. The boundary was created based on the frequency of low-altitude flight tracks and plotted noise complaint locations. It extends into East County due to significant helicopter operations between NASNI and the Mountain Warfare Training Camp Monsoor near Campo along which flightpath documented noise complaints have occurred.

Concerns Among Certain Stakeholders

In 2017, stakeholders brought up several concerns during the development of the draft ALUCP with the Working Group. ALUC staff responded in writing to those stakeholder concerns at the time and many of those same concerns were submitted again during public review of the Draft EIR in 2020. In addition, two new concerns were raised regarding the Regional Housing Needs Assessment (RHNA) and urban decay. Summaries of the recurring 2017 and new concerns are described below.

Validity of the 2011 AICUZ/Not a Long-Range 20-year Master Plan

The current AICUZ Study, which includes NASNI and Naval Outlying Landing Field Imperial Beach (NOLF IB), was published in 2011 by the Navy. As indicated in the 2011 AICUZ, the prospective level of aircraft operations is based on the anticipated transition of aircraft types and flight activity for 2020, consistent with Navy guidance: “Based on the currently available unclassified information, each installation will develop a forecast of air operations activity levels (normally for a time frame 5 to 10 years forward). Forecasts may be based upon historical trends or projected aircraft base loading and should address expected mission changes.”¹

¹ OPNAV Instruction 11010.36C, Air Installations Compatible Use Zones (AICUZ) Program, Chief of Naval Operations and Commandant of the Marine Corps, 9 October 2008, p. 4-1.

A number of comments were received requesting that the AICUZ study be updated prior to preparing an ALUCP. However, according to the Navy's AICUZ guidance, frequent AICUZ study updates are not advisable, because a primary purpose of the program is to promote long-term land use compatibility planning.² Frequent changes in key planning parameters, including noise contours and accident potential zones, can undermine a long-term land use compatibility-planning framework. The guidance states that "AICUZ reviews should be conducted when new requirements are anticipated at an installation such as basing of a new type of aircraft, significant increases in operational levels, or significant increases in nighttime (2200 to 0700 hours) flying activities."³

In addition, in two letters dated October 30, 2017, and March 25, 2020, from the Commander of Naval Base Coronado to the SDCRAA Director of Planning and Environmental Affairs, the Commander specifically addressed the question of whether the NASNI AICUZ Study had an expiration date. The Commander explained in the 2017 letter, "Navy policy emphasizes AICUZ studies are intended to be long term planning documents and regular updates are not required. AICUZ studies are reviewed when new requirements are anticipated at an installation, such as basing of a new type of aircraft, significant increases in operational levels, or significant increases in nighttime flying activities. At this time, the Navy is not anticipating new operational requirements at either NASNI or NOLFIB that would require such a review; therefore the current 2011 AICUZ study is valid indefinitely."⁴ The same language appears in the 2020 letter, which further states, "The future year forecast and analysis is not intended to reflect the lifespan or an expiration date of the AICUZ study." The 2020 letter goes on to say, "Please note that the National Environmental Policy Act analysis for the transition from the C2A aircraft to the Navy V22 [CMV-22B] aircraft at Fleet Logistics Centers, including NASNI, indicate that the proposed operations and noise contours associated with the aircraft transition are within the established parameters of the 2011 AICUZ study and a new study is not required."⁵

As discussed in the Draft EIR, the Navy recently reviewed the AICUZ study as part of its Environmental Assessment (EA) of the planned conversion from C-2A Greyhound fixed-wing aircraft to CMV-22B Osprey tilt-rotor aircraft, starting in 2020 and finishing by 2028. The EA concluded that no significant environmental impacts would occur with the proposed project.⁶ In addition, the EA concluded that no changes to the AICUZ study, prepared in 2011, would be required.⁷

² OPNAV Instruction 11010.36C, Air Installations Compatible Use Zones (AICUZ) Program, Chief of Naval Operations and Commandant of the Marine Corps, 9 October 2008, p. 1-1.

³ OPNAV Instruction 11010.36C, Air Installations Compatible Use Zones (AICUZ) Program, Chief of Naval Operations and Commandant of the Marine Corps, 9 October 2008, p. 5-1.

⁴ S.T. Mulvehill, Captain U.S. Navy, Commanding Officer Naval Base Coronado, letter to Brendan Reed, Director, Planning and Environmental Affairs, SDCRAA, 30 October 2017.

⁵ J.W. DePree, Commanding Officer, Naval Base Coronado, letter to Brendan Reed, Director, Planning & Environmental Affairs, SDCRAA, March 25, 2020.

⁶ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, pp. ES-5 – ES-13. Cited in NASNI ALUCP Draft EIR, p. 4-19.

⁷ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-6. Cited in NASNI ALUCP Draft EIR, p. 4-19; Finding of No Significant Impact for the Environmental Assessment for the

ALUC Authority over Changes to Existing Land Uses

Perhaps foremost among the statutory limitations on ALUCs is that they have no authority over existing land uses regardless of whether such uses are incompatible with airport activities.⁸ The ALUC's purpose is to ensure "the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses."⁹ [Emphasis added]

Certain modifications to existing land uses are subject to the statute:

It is the intent of the Legislature to discourage incompatible land uses near existing airports. Therefore, prior to granting permits for the renovation or remodeling of an existing building, structure, or facility, and before the construction of a new building, it is the intent of the Legislature that local agencies shall be guided by the height, use, noise, safety, and density criteria that are compatible with airport operations, as established by this article, and referred to as the Airport Land Use Planning Handbook [Handbook], published by the division, and any applicable federal aviation regulations, including, but not limited to, Part 77 (commencing with Section 77.1) of Title 14 of the Code of Federal Regulations, to the extent that the criteria has been incorporated into the plan [ALUCP] prepared by a commission [ALUC] pursuant to Section 21675.¹⁰ [Emphasis added]

The *Handbook* explains that, "The limitation on ALUC authority over existing land uses applies only to the extent that the use remains constant. Merely because a land use exists on a property does not entitle the owner to expand the use, convert it to a different use, or otherwise redevelop the property if new or increased compatibility conflicts would result. To the extent that such land use changes require ministerial or discretionary approval on the part of the county or city, they fall within the authority of the ALUC to review."¹¹ [Emphasis added]

The Public Utilities Code does not define when in the land use planning and development process a proposed new land use effectively becomes an existing use. The Draft ALUCP (Table 3) addresses this matter by defining "existing land use" as follows:

Any use occurring as of the effective date of this ALUCP that remains constant without increase in density or height of habitable space or physical change to a nonresidential structure's gross floor area or height that would increase intensity

Transition From C-2A to Cmv-22B Aircraft at Fleet Logistics Centers - Naval Air Station North Island, California and Naval Station Norfolk, Virginia, November 1, 2018, p. 7 of 17.

⁸ Pub. Util. Code §§21670(a) and 21674(e).

⁹ Pub. Util. Code §21670(a)(2) (emphasis added).

¹⁰ Pub. Util. Code §21674.7(2b) (emphasis added).

¹¹ The Onyx Group, *Air Installation Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, prepared for NAVFAC-SW, 2011, p. 4-41.

A land use is considered existing if a vested right is obtained in any of the following ways prior to adoption of this ALUCP:

- Issuance of a valid building permit or other development permit with substantial work performed and substantial liabilities incurred in good faith reliance on the permit¹²
- An executed and valid development agreement¹³
- An approved and unexpired vesting tentative map¹⁴

In addition, the Public Utilities Code does not address the question of whether or how much an existing use can be modified or reconstructed without being subject to the ALUCP. These types of issues have been addressed directly by provisions in the Draft ALUCP. Specifically, the Draft ALUCP would apply to some proposed changes in existing land uses, such as proposals for change to an incompatible land use and increases in structure height. Proposals to expand or reconstruct residences by 50 percent or more of the habitable area would be compatible subject to the achievement of interior sound level performance standards (45 dB CNEL) in the expanded or reconstructed parts of the dwelling. Table 3 in the Draft ALUCP describes the modifications to existing land uses that are exempt from ALUC review.

Mandate to Prepare ALUCP

The ALUC is required by state law to adopt an ALUCP for NASNI, and this requirement has not been suspended. See, e.g., Gov. Code §17581; California Commission on State Mandates Decision 03-TC-12, 4507. In a letter to the ALUC Chair, dated August 30, 2017, the Chief of the Office of Aviation Planning, Caltrans Division of Aeronautics, emphasizes that the ALUCP for NASNI is statutorily mandated, as quoted below.

First, we would like to point out that an ALUCP for NASNI is statutorily mandated. This mandate is in accordance with the California Public Utilities Code (PUC) sections 21675 (a) and (b), which specifically require that each ALUC shall formulate an ALUCP for each public airport and the area surrounding the airport within the jurisdiction of the ALUC, including areas surrounding any military airport regardless of whether the City is "built-out."

Government Code section 17581 specifies when local agencies are not required to implement a state law because the law is an unfunded state mandate. In order for a local agency to not be "required to implement or give effect to any statute or executive order," both of the following conditions must be met: 1) the statute must have been found to mandate a new program or higher level of service requiring reimbursement of local agencies pursuant to Section 6 of Article XIII B of the California Constitution; and 2) the statute has been specifically identified by the Legislature as being one for which reimbursement is not provided.

¹² Pursuant to the California Supreme Court decision in *Avco Community Developers, Inc. v. South Coast Regional Com.* (1976) 17 Cal.3d 785,791 and its progeny.

¹³ Gov. Code §65866.

¹⁴ Go. Code §66498.1.

The second requirement has been met because the Legislature has specifically identified “Airport Land Use Commission/Plans” as a suspended state mandate for 2016/17. However, the first requirement of the statute mandating a new program or higher level of service requiring reimbursement has not been met. Specifically, the California Commission on State Mandates (“CSM”) has found that the preparation of an ALUCP is not a reimbursable state mandate because the state requirement to prepare ALUCPs found in Public Utilities Code section 21675 predated 1975 (and is thus not subject to reimbursement pursuant to Art XIII(B)(6)(a)(3) of the California Constitution) and state reimbursement is not required when the expense incurred by the local agency can be recovered through charging fees (Pub. Util. Code § 21671.5(f) authorizes fees related to the preparation of ALUCPs). Because the CSM has specifically found that the preparation of ALUCPs does not create a new program or higher level of service requiring reimbursement of local agencies, the first requirement of Government Code section 17581 has not been satisfied and this section cannot be relied on to relieve the Authority of its legal obligation to prepare ALUCPs under Public Utilities Code section 21675.

Impact of ALUCP on City of Coronado’s Compliance with RHNA

As explained in Section 4.2.4.1 of the Draft EIR, implementation of the Draft ALUCP could result in the displacement of up to 36 dwelling units (28 single-family units on 19 oversized lots and 8 multiple-family units on 4 lots) from the safety zones within the City of Coronado.¹⁵ Section 4.2.4.7 of the Draft EIR explains the speculative nature of this potential residential development, especially the single-family development.¹⁶ It also notes that although most of the land in Coronado is developed, opportunities for development similar to those in the Draft ALUCP safety zones are likely to exist in residential-zoned areas elsewhere in Coronado.¹⁷ Importantly, however, Section 4.2.4.7 of the Draft EIR also notes that the City lacks the ability to expand through annexation. “Thus, without rezoning to allow higher residential densities [outside the safety zones], the city has a finite capacity for additional housing development. Thus, it must be recognized that implementation of the Draft ALUCP would reduce the total housing capacity of the city by 36 dwelling units.”¹⁸

It should be noted that the development of new accessory dwelling units within the safety zones would be consistent with the Draft ALUCP.¹⁹

¹⁵ NASNI ALUCP Draft EIR, December 2019, p. 4-23 – 4-24.

¹⁶ NASNI ALUCP Draft EIR, December 2019, p. 4-23 – 4-24. “These [19] lots could accommodate up to an additional 28 homes if they could be subdivided. For this to be possible, however, the large homes on the affected lots may have to be demolished for the split lots to be configured to accommodate new homes. Given the high value of the real estate in the area, this may be a future possibility. On the other hand, the existing homes are quite substantial and expensive and may continue to be highly valued by the market as they are. Thus, the potential redevelopment of the properties (without implementation of the ALUCP) can only be considered speculative.”

¹⁷ NASNI ALUCP Draft EIR, December 2019, p. 4-41.

¹⁸ NASNI ALUCP Draft EIR, December 2019, p. 4-45.

¹⁹ Draft NASNI ALUCP, December 2019, p. 21.

The Draft EIR concluded that “it is possible that implementation of the ALUCP could interact with the updated RHNA allocation [for Coronado] and the updated [Coronado] Housing Element to create cumulative impacts.”²⁰ While the Draft EIR established the appropriate footing and foundation as required by CEQA, in light of the controversy surrounding this issue, the ALUC has confirmed that the text in the Draft EIR still accurately captures the current state of affairs, including the City of Coronado’s final SANDAG-approved allocation of 912 dwelling units.²¹

Create Undue Burden on Projects, Leading to Urban Decay

The policies and standards of the Draft ALUCP are limited in their application to new land uses and specific changes in existing land uses. As such, they are unlikely to lead to the alteration of the character of the affected area or result in blighting influences. All existing land uses, as that term is defined in the Draft ALUCP, located within the safety zones and 65 dB CNEL contour are unaffected by and exempt from the Draft ALUCP. Only new uses and certain proposed changes to existing land uses would be subject to Draft ALUCP policies and standards. Many kinds of development would be unaffected by implementation of the ALUCP. As described in Table 3 of the Draft ALUCP,²² various development projects would be exempt from ALUC review, and other projects would require only measures to attenuate outdoor noise to maximum interior levels of 45 dB CNEL.²³

Section 4.2.4 of the Draft EIR analyzes the impacts of the Draft ALUCP on potential future development within the Area of Potential Impact.²⁴ Section 4.2.4.7 of the Draft EIR summarizes those impacts.²⁵ As the analysis indicates, all potential land use impacts are speculative.

- No undeveloped land exists in the Area of Potential Impact.
- The nineteen single-family zoned properties subject to the potential displacement of 28 future residences are all currently developed and would have to be subdivided to accommodate any additional residences (other than accessory dwelling units). In at least some cases, the existing homes would have to be removed to allow for the subdivision and siting of new homes on the affected lots.
- The four multiple-family zoned properties subject to the displacement of eight future dwelling units are all currently developed and would likely require redevelopment in order to accommodate more housing.
- Two existing C—Commercial-zoned properties, which are currently developed, would be subject to the Draft ALUCP policy limiting increases in gross floor area.

²⁰ NASNI ALUCP Draft EIR, December 2019, p. 4-53 – 4-54.

²¹ SANDAG, *Proposed Final 6th Cycle Regional Housing Needs Assessment Plan*, June 26, 2020, Table 4.7, p. 27. https://www.sandag.org/uploads/projectid/projectid_189_27666.pdf, accessed July 14, 2020.

²² San Diego County Regional Airport Authority, *Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 9 – 10.

²³ San Diego County Regional Airport Authority, *Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 21 – 24.

²⁴ San Diego County Regional Airport Authority, *Draft Environmental Impact Report for the Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 4-22 – 4-48.

²⁵ San Diego County Regional Airport Authority, *Draft Environmental Impact Report for the Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 4-39 – 4-48.

- One H-M—Hotel-Motel-zoned property, the Hotel del Coronado, would be subject to the Draft ALUCP policy limiting increases in gross floor area. The Amended Master Plan for the property, however, would be unaffected by that limitation as it has been approved and has vested rights to build additional square footage. Thus, only speculative long-term development, for which there are currently no plans, would be affected by implementation of the Draft ALUCP.

The Draft ALUCP would consider the development of various new land uses, none of which currently exist within the safety zones, to be incompatible. These include uses serving large assemblies of people and people with limited effective mobility and uses involving the storage or processing of large quantities of hazardous materials.²⁶ Because no undeveloped land remains within the safety zones, these uses could only be accommodated through reconstruction or the adaptive reuse of existing buildings (the overwhelming majority of which are currently residential). Most of the incompatible nonresidential uses are institutional or public service uses, which are both subject to limited development demand and priced out of the local real estate market.²⁷ No commenters have provided any evidence of how the speculative effects described above could set in motion a downward spiral of disinvestment and urban decay, especially in an area so highly valued in the real estate market.²⁸

In administering ALUCPs for the other 15 airports in San Diego County, the ALUC has established project review procedures ensuring the efficient processing of referrals for ALUCP consistency review. Although permitted by state law to do so, the ALUC does not charge any fees for its review. While the law requires the ALUC to make a consistency determination within 60 days of receiving a complete application for a determination of consistency with the ALUCP, based on the ALUC's experience, the entire consistency review process typically ranges from one to three weeks, assuming initial receipt of a complete application. Unless the proposed land use is considered to be inconsistent with the ALUCP, ALUC staff have authorization to issue the consistency determination; only those land use actions which are incompatible with one or more of the ALUCP compatibility factors must go before a noticed hearing of the full ALUC. Thus, the costs and timeline of obtaining consistency determinations are not so burdensome as to unduly delay the processing time of development permits, as the ALUC's review runs concurrent with, not consecutive to, the City's own permit processing schedule.

²⁶ San Diego County Regional Airport Authority, *Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 21–24.

²⁷ San Diego County Regional Airport Authority, *Draft Environmental Impact Report for the Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, p. 4-47 – 4-48.

²⁸ "In January 2019, average prices for homes in the neighborhoods within the safety zones listed on trullia.com ranged from \$25,000,000 to \$1,398,000 (https://www.trulia.com/real_estate/Coronado-California/, accessed January 30, 2019). A search of homes listed on Zillow found 18 homes in the study area listed for sale with prices ranging up to \$25,000,000. Ten of the homes were listed for more than \$3,500,000 (https://www.zillow.com/homes/for_sale/32.6926,-117.176453,32.67994,-117.196966_rect/15_zm/1_fr/, accessed January 30, 2019)." See San Diego County Regional Airport Authority, *Draft Environmental Impact Report for the Draft Naval Air Station North Island Airport Land Use Compatibility Plan*, December 2019, footnote 58, p. 4-27.

Moreover, the City of Coronado has the ability to implement the ALUCP into its own General Plan and zoning code, which, once found consistent with the ALUCP by the ALUC, will alleviate the need for individual project referrals for consistency determination to the ALUC. This expeditious statutory process has been effectively accomplished by a number of jurisdictions in San Diego County, such as the cities of Carlsbad, El Cajon, Imperial Beach, and San Diego as well as the County of San Diego. One method of implementing the ALUCP is through adoption of an overlay-zoning ordinance, applying the ALUCP policies and standards within overlay zones corresponding with the ALUCP noise contours and safety zones. Such action by the City of Coronado would reduce the administrative burden and timeline to the full extent possible. Alternatively, the City of Coronado may overrule the ALUCP (or portions of it), which would make project referrals to the ALUC unnecessary.

The ALUC has been administering ALUCPs for other airports in San Diego County for over 10 years. Parts of the airport influence areas for those ALUCPs include mature communities that have been developed for many decades. Examples include the communities near San Diego International Airport, Montgomery-Gibbs Executive Airport, Gillespie Field, and Brown Field Municipal Airport. None of the affected communities have reported any reduction in community investment or increases in urban decay attributable to ALUCP policies.

ALUCP Implementation

State law requires that each local agency having jurisdiction over land uses within an AIA modify its General Plan and/or zoning ordinance to be consistent with the ALUCP, or to take steps necessary to overrule the ALUCP as a whole or in part. ALUC staff has met with the City of Coronado on numerous occasions in order to explain the proposed ALUCP policies and standards and answer questions related to implementation of the plan. While the City of Coronado's General Plan's strategic vision is consistent with the Draft ALUCP, there are conflicts with the City's zoning ordinance. Implementation of the ALUCP would require greater restrictions on the density and intensity of development and the designation of specific land use types as incompatible within certain safety zones and noise contours. ALUC staff will continue to work with the affected local agencies after the adoption of the proposed ALUCP to provide any assistance that might be required during the implementation process.

Staff submits the following documents for ALUC consideration:

- The Final EIR for the NASNI ALUCP, which includes ALUC staff responses to public comments received on the Draft EIR and ALUCP, and all other related environmental documentation;
- The proposed Resolution 2020-0001 ALUC, certifying the Final EIR for the NASNI ALUCP (including Attachment A – Statement of Overriding Considerations and Attachment B – Mitigation Monitoring and Reporting Program);
- The proposed NASNI ALUCP; and
- The proposed Resolution 2020-0002, adopting the proposed ALUCP for NASNI.

These documents are intended to provide all the information sufficient and necessary for the ALUC to certify the Final EIR for NASNI as the appropriate environmental document for the proposed ALUCP and adopt the ALUCP for NASNI.

Fiscal Impact:

Adequate funding for the NASNI ALUCP is included in the adopted FY 2021 and conceptually approved FY 2022 Operating Expense Budgets within the Planning and Environmental Affairs Department's personnel and professional services budget line items.

Authority Strategies/Focus Areas:

This item supports one or more of the following (*select at least one under each area*):

Strategies

- Community Strategy Customer Strategy Employee Strategy Financial Strategy Operations Strategy

Focus Areas

- Advance the Airport Development Plan Transform the Customer Journey Optimize Ongoing Business

Environmental Review:

A. CEQA: In accordance with the California Environmental Quality Act (CEQA), staff has considered whether the proposed ALUCP may have a significant effect on the environment using the CEQA Guidelines, set forth in Title 14 of the California Code of Regulations at Section 15000 et seq., and the Airport Authority's own CEQA Procedures. Environmental effects of the proposed ALUCP were initially documented in a Notice of Preparation (NOP) with an Initial Study, which were circulated for a 30-day period of public review beginning April 22, 2019. The Initial Study indicated that the proposed ALUCP may result in potentially significant impacts to the following environmental category: Land Use and Planning. Staff held a scoping meeting on May 6, 2019 to allow the public to express their opinions on the scope of the environmental analysis. Staff received six comments/letters in response to the circulated NOP and Initial Study, and the relevant comments were incorporated into the subsequent environmental analysis and documentation.

Pursuant to the Initial Study, ALUC staff prepared a Draft EIR which concluded that the proposed ALUCP may result in potentially significant and unavoidable impacts to Land Use and Planning. The Draft EIR was circulated for public review and comment for 62 days, beginning December 19, 2019, in response to a request made by the City of Coronado to extend it beyond the 45-day period required by CEQA. ALUC staff subsequently received four letters from governmental entities and 51 letters and emails from members of the public. In addition, 335 members of the public submitted the same comment letter.

B. California Coastal Act Review: This ALUC action is not a "development" as defined by the California Coastal Act. (Pub. Res. Code §30106).

C. NEPA: This ALUC action is not a project that involves additional approvals or actions by the FAA and, therefore, no formal review under the National Environmental Policy Act (NEPA) is required.

Prepared by:

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Table 1 Land Use Standards for Noise and Safety Compatibility

SAN DIEGO COUNTY AIRPORT LAND USE COMMISSION

Table 4 (1 of 4) Standards for Noise and Safety Compatibility

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

SAN DIEGO COUNTY AIRPORT LAND USE COMMISSION

Table 4 (2 of 4) Standards for Noise and Safety Compatibility

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

SAN DIEGO COUNTY AIRPORT LAND USE COMMISSION

Table 4 (3 of 4) Standards for Noise and Safety Compatibility

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

SAN DIEGO COUNTY AIRPORT LAND USE COMMISSION

Table 4 (4 of 4) Standards for Noise and Safety Compatibility

SLUCM ² CODE	LAND USE TYPE ¹	CZ	APZ I	APZ II	INSIDE 65 DB CNEL ³ & OUTSIDE SAFETY ZONES	STANDARDS ⁴
80	Resource Production and Extraction					
81-85, 89	Agriculture, aquaculture, mining					

KEY TO TABLE 4:

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

NOTES TO TABLE 4:

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

SOURCES: San Diego County Airport Land Use Commission, September 2020. Adapted from Tables C-1 and C-2 in the 2011 AICUZ (The Onyx Group, *Air Installations Compatible Use Zones (AICUZ) Update for Naval Air Station North Island and Naval Outlying Landing Field Imperial Beach, California*, Naval Facilities Engineering Command Southwest, 2011, pages C-1 - C-10.)

Figure 3 Airspace Protection Boundary

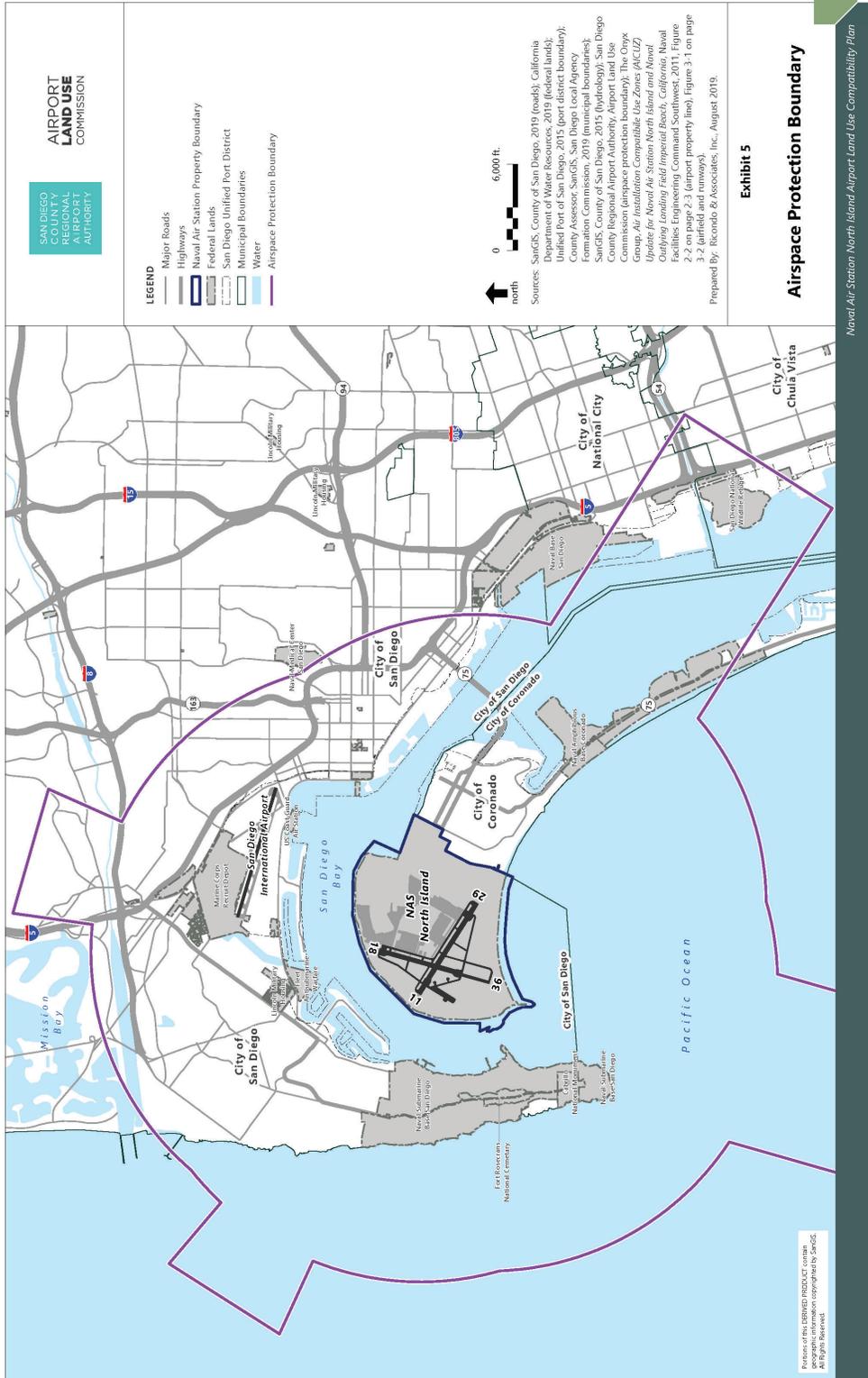
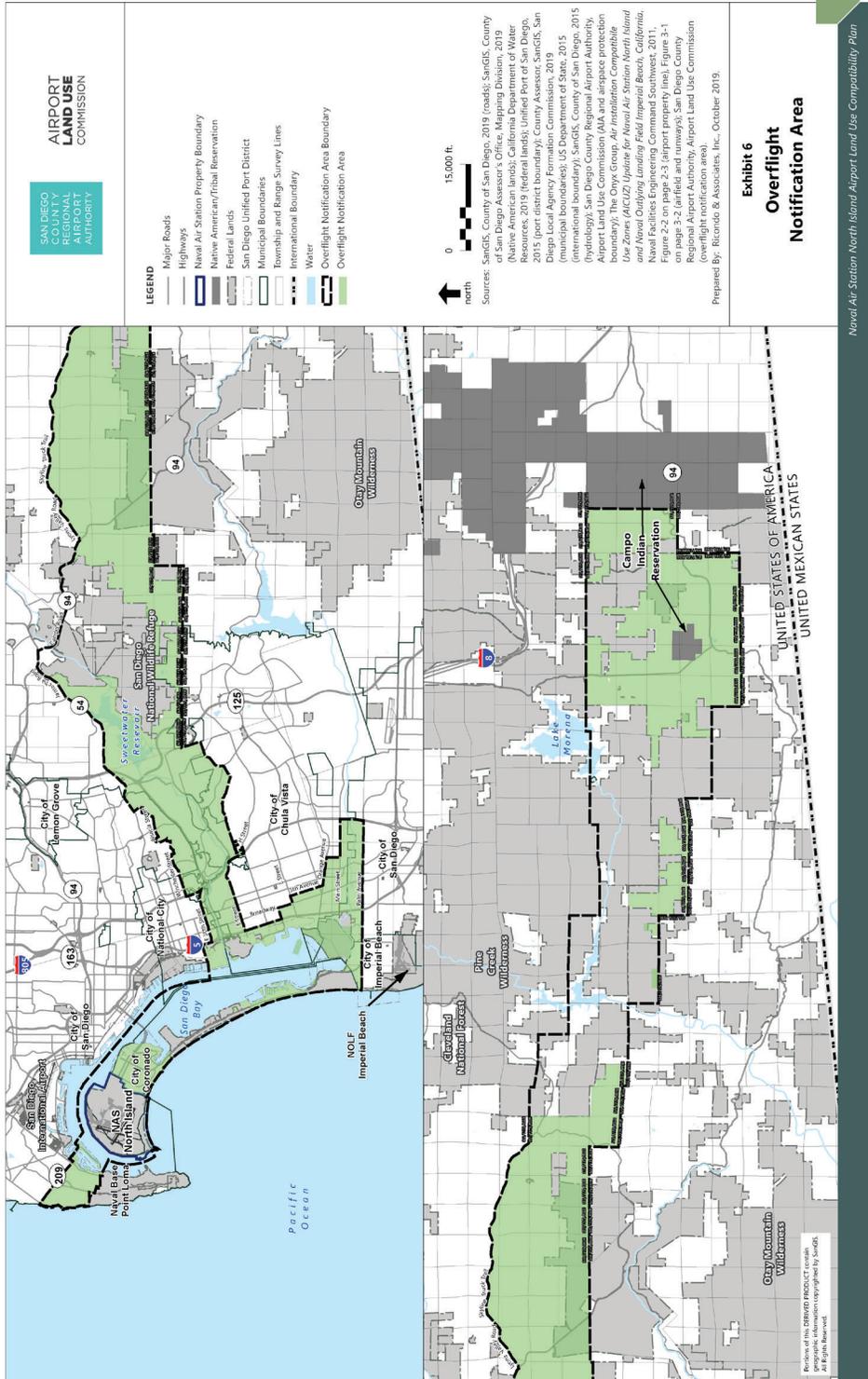


Figure 4 Overflight Area Boundary



RESOLUTION NO. 2020-0001

A RESOLUTION OF THE AIRPORT LAND USE COMMISSION FOR SAN DIEGO COUNTY, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR NAVAL AIR STATION NORTH ISLAND AIRPORT LAND USE COMPATIBILITY PLAN AND ADOPTING CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS OF FACT, A STATEMENT OF OVERRIDING CONSIDERATIONS AND A MITIGATION MONITORING AND REPORTING PROGRAM.

WHEREAS, the San Diego County Regional Airport Authority (Airport Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County, is required to prepare and adopt an Airport Land Use Compatibility Plan (ALUCP) for Naval Air Station North Island (NASNI) (see Pub. Util. Code, §§21670.3(a); 21675(b)); and

WHEREAS, in preparing the NASNI ALUCP (also referred to herein as the proposed Project), the ALUC is required to comply with the California Environmental Quality Act (CEQA; Pub. Res. Code, §21000 et seq.), the State CEQA Guidelines (CEQA Guidelines; Cal. Code Regs., tit. 14, §15000 et. seq.), and the Airport Authority's own CEQA Procedures; and

WHEREAS, in accordance with CEQA, on April 22, 2019, ALUC staff prepared and circulated, for a thirty (30) day public review period, a Notice of Preparation (NOP) and Initial Study for the proposed Project (State Clearinghouse No. 2019049125); and

WHEREAS, the NOP and Initial Study concluded that the NASNI ALUCP may result in potentially significant environmental impacts to land use and planning; and

WHEREAS, the NOP and Initial Study concluded that the proposed Project would not result in potentially significant impacts to any of the following environmental impact areas: aesthetics; agriculture and forestry resources; air quality; biological resources; cultural resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; mineral resources; noise; population and housing, public services; recreation; transportation and traffic; tribal cultural resources; utilities and service systems; and wildfire; and

WHEREAS, on May 6, 2019, after providing the public with notice via the NOP, direct mailings, and advertisements on the Authority website and in multiple local publications, ALUC staff held a scoping meeting in order to provide interested parties with an additional opportunity to comment on the scope of the environmental analysis for the proposed Project; and

WHEREAS, ALUC staff received six (6) comment letters in response to the NOP and Initial Study (one from a state agency, three from local agencies, one from a Native American tribe, and one from an individual); and

WHEREAS, a Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2019049125) for the proposed Project was prepared pursuant to CEQA and the CEQA Guidelines and the Airport Authority's CEQA Procedures; and

WHEREAS, ALUC staff sent a Notice of Availability (NOA) of the Draft EIR, via certified mail, regular mail and email to all individuals, entities, agencies, and others on its distribution list, including the affected local agencies (the cities of San Diego, Coronado, National City, Chula Vista and Imperial Beach; the County of San Diego; and the San Diego Unified Port District), posted the NOA at the San Diego County Clerk's Office, and published the NOA in multiple local publications; and

WHEREAS, the Draft EIR was circulated for public review on December 19, 2019, for a forty-five (45) day comment period, which was then extended to sixty-two (62) days (due to an extension request by the City of Coronado), concluding on February 18, 2020; and

WHEREAS, ALUC staff received fifty-five (55) comment letters on the Draft EIR from state agencies, local agencies, organizations, and individuals, in addition to a form letter from 335 people; and

WHEREAS, ALUC staff prepared individual responses to each of the comment letters received on the Draft EIR, as well as eighteen (18) topical responses for areas addressed in a number of the comment letters received on the Draft EIR; and

WHEREAS, a Final EIR was prepared pursuant to CEQA and the CEQA Guidelines; and

WHEREAS, the Final EIR was released on August 20, 2020, and incorporated the Draft EIR and included written responses to the comments received during the review and comment period; and

WHEREAS, ALUC staff sent a Notice of Availability (NOA) of the Final EIR, via email or overnight mail, to the 390 commenters on August 20, 2020, and the commenters were notified that a public hearing to consider the proposed Project and supporting CEQA documentation would be held on September 3, 2020; and

WHEREAS, the Final EIR concluded that the proposed Project may result in significant and unavoidable impacts on a project-specific and cumulative basis to Land Use and Planning; and

WHEREAS, a Mitigation Monitoring and Reporting Program is required under the CEQA (Pub. Res. Code§ 21081.6) to provide for the monitoring of mitigation measures which are part of the proposed Project; and

WHEREAS, the ALUC held a duly noticed public meeting on September 3, 2020, to receive and consider public testimony with respect to the NASNI ALUCP and the completeness and adequacy of the Final EIR for the proposed ALUCP; and

WHEREAS, the ALUC has reviewed and considered all of the information presented to it as set forth above, and this Resolution and action taken hereby is a result of the ALUC's independent judgment and analysis; and

NOW, THEREFORE, BE IT RESOLVED that the ALUC:

- (1) Certifies that the Final EIR has been prepared and completed in compliance with CEQA, the CEQA Guidelines and the Airport Authority's own CEQA Procedures; and
- (2) Certifies that it has reviewed and considered the Final EIR, including the information contained therein, and the whole record of these proceedings; and
- (3) Certifies that the Final EIR reflects the ALUC's independent judgment and analysis; and
- (4) Adopts the attached Findings of Fact and Statement of Overriding Considerations (Attachment A to this Resolution), which the ALUC finds are supported by substantial evidence; adopts the attached Mitigation Monitoring and Reporting Program (Attachment B to this Resolution); and directs staff to file a Notice of Determination with respect to the NASNI ALUCP within five (5) days of approval of the NASNI ALUCP and in accordance with the requirements of CEQA Guidelines section 15094.

PASSED, ADOPTED, AND APPROVED by the ALUC for San Diego County at a regular meeting this 3rd day of September 2020, by the following vote:

AYES: Commissioners:

NOES: Commissioners:

ABSENT: Commissioners:

ATTEST:

TONY R. RUSSELL
DIRECTOR, BOARD SERVICES/
AUTHORITY CLERK

APPROVED AS TO FORM:

AMY GONZALEZ
GENERAL COUNSEL

ATTACHMENT A
FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE NAVAL AIR STATION NORTH ISLAND - AIRPORT LAND USE
COMPATIBILITY PLAN ENVIRONMENTAL IMPACT REPORT

1.0 INTRODUCTION

This document constitutes the independent findings and reflects the independent judgment of the San Diego County Regional Airport Authority (Airport Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County (County). The findings are fully and completely supported by substantial evidence.¹ All language in this document constitutes findings, whether or not any particular sentence or clause includes a statement to that effect.

In that regard, all summaries of information and the findings presented herein are based on the Final Environmental Impact Report (EIR),² the Naval Air Station North Island (NASNI) Airport Land Use Compatibility Plan (ALUCP) (*i.e.*, the proposed Project), and other evidence in the record, including the 2011 *Air Installation Compatible Use (AICUZ)* study, as published by the Department of the Navy, and *California Airport Land Use Planning Handbook (Handbook; Oct. 2011)*, as published by the State of California Department of Transportation, Division of Aeronautics (Caltrans). The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The summaries of information below are only summaries. Therefore, cross-references to the Final EIR and other evidence in the record have been made where helpful, and reference should be made directly to the Final EIR and other evidence in the record for more precise information regarding the facts on which any summary is based. In addition, unless noted or stated otherwise, the rationale for the findings is set forth in the Final EIR (including the responses to comments) or elsewhere in the administrative record.

1.1 STATUTORY REQUIREMENTS FOR FINDINGS

The Final EIR identified significant environmental impacts associated with the proposed NASNI ALUCP. Under the California Environmental Quality Act (CEQA)³, approval of a project with significant and unavoidable impact(s) must be supported by findings of fact made by the lead agency.⁴ Specifically, the Airport Authority, acting in its capacity as the ALUC for the County, must make one or more of the following written findings:

- a. Changes or alterations have been required in, or incorporated into, the proposed NASNI ALUCP that avoid or substantially lessen the significant environmental impacts identified in the Final EIR;

¹ See Pub. Res. Code, §§21081.5 and 21082.1(c).

² The Final EIR consists of the Draft EIR (December 2019) and Final EIR (September 2020).

³ Pub. Res. Code, §21000 *et seq.*

⁴ Pub. Res. Code, §21081.

- b. Such changes or alterations are within the responsibility and jurisdiction of another public agency, and such changes have been adopted by such other agency or can and should be adopted by such other agency; and/or
- c. Specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR.⁵

Accordingly, the ALUC's findings contained herein accomplish the following:

- a. They address the significant environmental impacts identified in the Final EIR for the proposed NASNI ALUCP;
- b. They incorporate by reference and adopt all mitigation measures recommended in connection with the significant impacts identified in the Final EIR, and the Mitigation Monitoring and Reporting Program (MMRP) prepared for the proposed ALUCP (see Attachment B);
- c. They indicate whether a significant impact is avoided or reduced by the adopted mitigation measures to a less-than-significant level, or otherwise remains significant and unavoidable either because there are no feasible mitigation measures, or because even with implementation of mitigation measures a significant impact will occur, or because such changes or alterations are within the responsibility and jurisdiction of another public agency;
- d. They address the feasibility of all Project alternatives and mitigation measures identified in the Final EIR; and
- e. They incorporate and adopt a Statement of Overriding Considerations for all environmental impacts of the proposed Project that remain significant and unavoidable. (See **Section 12.0**, below.)

2.0 DESCRIPTION OF PROPOSED PROJECT

The proposed Project is the NASNI ALUCP. The Airport Authority, acting in its capacity as the ALUC for the County, is required by law to adopt an ALUCP for "area[s] within the jurisdiction of the [ALUC] surrounding any military airport."⁶ The NASNI site lies within the jurisdiction of the ALUC.

The basic function of an ALUCP is to promote compatibility between an airport and the land uses that surround the airport and lie within the airport's designated airport influence area (AIA), to the extent that these areas are not already devoted to incompatible uses.⁷ The AIA is comprised of the areas in which current or future airport-related noise, overflight, safety, and/or airspace protection concerns may affect future land uses or necessitate restrictions on those uses. The NASNI AIA includes portions of

⁵ California Code of Regulations, Title 14, §15091(a).

⁶ California Public Utilities Code, §21675(b).

⁷ Pub. Util. Code, §21675(a).

the cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego; the County of San Diego; and the San Diego Unified Port District.

Accordingly, the proposed NASNI ALUCP would provide compatibility policies and standards for the future development of new residential and nonresidential uses, and other noise or risk-sensitive uses within the AIA based on multiple factors established by the ALUCP, including the location of the development relative to the safety zones, the community noise equivalent level (CNEL) contours, the airspace protection surfaces, and the areas subject to overflight. The proposed ALUCP's policies and standards indicate whether the future development of specified land uses in certain portions of the AIA is incompatible, conditionally compatible, or compatible.

In addition, the proposed NASNI ALUCP would be utilized by the ALUC when it reviews proposed land use plans and regulations and projects within the AIA. The ALUCP also would assist local agencies in their preparation or amendment of land use plans and ordinances, as state law explicitly requires local agencies to modify their planning documents to be consistent with the ALUCP, or otherwise overrule the ALUC within a specified time frame.⁸

3.0 FINDINGS OF NO IMPACT

As noted in **Section 1.6** of the Draft EIR and in **Section 4.2** of the Initial Study (Appendix A of the Draft EIR), no impacts to agricultural and forestry resources are anticipated with implementation of the proposed project.

4.0 IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT

As specifically addressed in **Section 1.6** of the Draft EIR and in the Initial Study (**Sections 4.1** and **4.3** through **4.20** of Appendix A of the Draft EIR), certain potential impacts to various environmental categories were determined to be less than significant. These environmental impact categories include:

- Aesthetics
- Air quality
- Biological resources
- Cultural resources
- Energy
- Geology and soils
- Greenhouse gas emissions
- Hazards and hazardous materials
- Hydrology and water quality

⁸ Pub. Util. Code, §21676.

- Mineral resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and traffic
- Tribal Cultural Resources
- Utilities and service systems
- Wildfire

The ALUC hereby adopts and incorporates by reference the reasons stated in **Sections 4.1** and **4.3** through **4.20** of Appendix A of the Draft EIR as its grounds for determining that the NASNI ALUCP will have a less-than-significant impact on each of these environmental impact categories.

5.0 LAND USE AND PLANNING IMPACTS IDENTIFIED AND ANALYZED AND DETERMINED TO HAVE NO SIGNIFICANT IMPACT

The ALUC finds and determines that the land use and planning impacts described and summarized in this Section and identified and evaluated in the Final EIR are not significant environmental impacts and that no mitigation measures are needed. The significance thresholds identified below in italics and used to render these impact determinations are found in Appendix G of the CEQA Guidelines.

The parenthetical citations included with each “impact threshold” refer to the labeling of the impact thresholds in **Section 4.11** in Appendix A of the Draft EIR.

Impact Threshold: a. Physically divide an established community.

Finding: The ALUC finds that implementation of the proposed Project will have no impact with regard to physically dividing an established community, and therefore no mitigation is required.

As discussed in **Section 4.2.3** of the Draft EIR and **Section 4.11** in Appendix A of the Draft EIR, the NASNI ALUCP does not propose or entail any new development, construction, or changes to existing land uses or the environment. Therefore, the ALUCP would not result in the physical division of an established community.

Impact Threshold: b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Finding: The ALUC finds that implementation of the proposed Project will have a less-than-significant impact with regard to conflicting with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purpose of avoiding or mitigating an environmental effect, and therefore no mitigation is required.

As discussed in **Section 4.2.3** of the Draft EIR and **Section 4.11** in Appendix A of the Draft EIR, the NASNI ALUCP does not propose or entail any new development, construction, or changes to existing land uses or the environment. While the ALUCP conflicts with existing zoning in parts of the ALUCP Area of Potential Impact by limiting the density of new residential development, limiting the intensity of new nonresidential development, and designating certain new land uses as incompatible, as discussed in **Section 4.11** of Appendix A of the Draft EIR, those conflicts would not interfere with any land use plans, policies, or regulations intended to mitigate or avoid an environmental effect. It is possible that the policies and standards of the ALUCP could result in a shift in development patterns that could result in conflicts with applicable land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect. Any such shifts are subject to considerable uncertainty and would depend on a combination of factors that are extremely difficult to predict, including future market forces and the preferences of developers and property owners. Therefore, the proposed Project cannot reasonably be considered to result in significant impacts with respect to applicable land use plans, policies, or regulations adopted to avoid or mitigate an environmental effect.

6.0 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS THAT CANNOT BE MITIGATED TO A LEVEL OF INSIGNIFICANCE

The Final EIR identified the following significant and unavoidable impacts associated with Project approval, and, where feasible, recommended mitigation measures. The ALUC hereby finds that this significant and unavoidable impact is outweighed by the public benefits provided by the proposed Project, and is acceptable, as more fully specified in the "Statement of Overriding Considerations" (**Section 13.0**, below.) As noted above, the significance thresholds used to render these impact determinations are found in Appendix G of the CEQA Guidelines.

6.1 ENVIRONMENTAL IMPACTS – LAND USE AND PLANNING

Section 4.2.4 of the Draft EIR presents an analysis of the impacts of the proposed Project on Land Use and Planning. Approximately 52 percent of the Hotel-Motel (H-M) zoned land in Coronado is within the proposed ALUCP safety zones. Implementation of the NASNI ALUCP could potentially result in the potential maximum displacement of 38,023 square feet of future nonresidential development in the H-M zoning district.

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

6.2 MITIGATION MEASURES

Two mitigation measures that would reduce the substantial incompatibilities with the City of Coronado's adopted land use plans to less-than-significant levels were identified in **Section 4.2.5** of the Draft EIR and are hereby adopted by the ALUC. They would require action by the City of Coronado.

1: Following adoption of the NASNI ALUCP, the City of Coronado can and should amend its land use regulations to achieve consistency with the NASNI ALUCP.

2: Following adoption of the NASNI ALUCP, the City of Coronado can and should amend its General Plan, relevant specific plans, and Zoning Code to increase the allowable residential density or nonresidential development intensity (e.g., floor area ratios) in selected areas outside the ALUCP safety zones to compensate for the future development displaced from the safety zones.

Unless they choose to overrule an ALUCP, as provided by law, affected cities and counties are required to make their land use plans and zoning regulations consistent with new or amended ALUCPs.⁹ Implementation of the ALUCP policies and standards by the City of Coronado can be achieved by adoption of an Overlay Zone for the NASNI AIA. By such action, this would eliminate substantial incompatibilities between the proposed ALUCP and the City's zoning ordinance. At the same time, however, the maximum future residential units and nonresidential floor area within the ALUCP Area of Potential Impact would be reduced compared with existing conditions. If the potential development of those potentially displaced land uses is to be fully offset, then additional residential and nonresidential development must be allowed elsewhere. This could be accommodated through zoning amendments increasing allowable residential densities and allowable nonresidential floor area ratios in areas outside the safety zones of the proposed ALUCP.

Under the law, the City of Coronado also can overrule the proposed ALUCP, rather than implement it through amendments to zoning regulations. Thus, implementation of the proposed ALUCP cannot be guaranteed by the ALUC. If the City chooses to overrule the proposed ALUCP, no adverse environmental impacts would result, although the City would be required to adopt findings demonstrating that overruling of the proposed ALUCP would be consistent with the intent of the ALUC statute (Pub. Util. Code §21670, *et seq.*) as required by law.¹⁰

6.3 CUMULATIVE IMPACTS

Section 4.5 of the Draft EIR assessed potential cumulative impacts associated with the NASNI ALUCP in combination with the following actions that have recently been implemented or that are planned for the future.

⁹ California Public Utilities Code §§21675.1(d), 21676, 21676.5.

¹⁰ To overrule the ALUCP, a local governing body must make specific findings that its current land use plans and regulations are consistent with the purposes of the state's airport land use compatibility law and approve the overrule resolution by a two-thirds majority vote. See Public Utilities Code, §§21675.1(d) and 21676.5(a).

- City of Coronado Ordinance 2062 – Residential Standards Improvement Program
- City of Coronado Ordinance 2088 – Amended Historic Resources Code
- Regional Planning For Rising Sea Levels
- CMV-22B Conversion at NASNI
- Regional Housing Needs Assessment Update Process

In addition to these five actions, the potential cumulative impact of the NASNI ALUCP in combination with the other ALUCPs in San Diego County is discussed below.

Cumulative Impact Threshold: Do the impacts of the proposed ALUCP, in combination with the impacts of other projects, have the potential to become cumulatively significant.

6.3.1 Ordinance 2062 – Residential Standards Improvement Program

This ordinance amended the Zoning Code by adding design standards for residential development. The additional standards are intended to ensure light and air for properties adjacent to those that are undergoing development or expansion by limiting building heights and mass. The standards also adjusted residential yard and building setback requirements. These zoning amendments would not alter the effect of the proposed policies and standards of the ALUCP on potential residential development and would not lead to cumulative impacts on residential development.

6.3.2 Ordinance 2088 – Amended Historic Resources Code

This ordinance amended some of the criteria for buildings to qualify as historic resources and modified administrative processes related to applying for historic resource designation. Certain editorial revisions were also made.¹¹ The amendments to the Historic Resources Code would not change the relationship of the Code to the ALUCP, nor would the amendments interact with the proposed policies and standards of the ALUCP to create cumulative impacts.

6.3.3 Regional Planning for Rising Sea Levels

The City of Coronado has been coordinating with other San Diego Bay area governments and stakeholders in studying the potential impact of rising sea levels on the local natural and built environment. The City was represented on the Steering Committee and Technical Advisory Committee that participated in the preparation of an adaptation strategy document in 2012.¹²

At this point, no specific regulations or development standards related to sea level rise have been adopted by the City of Coronado. Neither the comprehensive strategies

¹² ICLEI Local Governments for Sustainability, Sea Level Rise Adaptation Strategy for San Diego Bay, January 2012. Prepared for the project's Public Agency Steering Committee, with the support of The San Diego Foundation.

nor the targeted strategies related to the building stock would interact with the proposed policies and standards of the ALUCP to create cumulative impacts.

6.3.4 CMV-22B Conversion at NASNI

The U.S. Navy is planning a conversion from C-2A Greyhound fixed-wing aircraft to CMV-22B Osprey tilt-rotor aircraft, starting in 2020 and finishing by 2028. The Environmental Assessment (EA)¹³ for the proposed project concluded that no significant environmental impacts would occur with either of the two alternatives.¹⁴ No changes to the AICUZ study, prepared in 2011, would be required.¹⁵

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

6.3.5 Regional Housing Needs Assessment Update Process

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

The final RHNA allocation was approved by SANDAG on June 26, 2020. The final allocation for Coronado was 912 dwelling units.¹⁶ The City must now update the Housing Element of the General Plan to account for achievement of their RHNA allocations by April 2021.¹⁷

As presented in **Section 4.2.4** and summarized in **Table 4-10** of the Draft EIR, the implementation of the proposed ALUCP could result in the displacement of 28 single-

¹³ Department of Defense, Department of the Navy, *Finding of No Significant Impact for the Environmental Assessment for the Transition from C-2A to CMV-22B Aircraft at Fleet Logistics Centers – Naval Air Station North Island, California, and Naval Station Norfolk, Virginia*, November 15, 2018.

¹⁴ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, pp. ES-5 – ES-13.

¹⁵ Naval Facilities Engineering Command, Atlantic Division, *Final Environmental Assessment for the Transition from C-2A to CMV-22V Aircraft at Fleet Logistics Centers Naval Air Station North Island and Naval Station Norfolk*, July 2018, p. ES-6.

¹⁶ SANDAG, Proposed Final 6th Cycle Regional Housing Needs Assessment Plan, *June 26, 2020*, Table 4.7, p. 27. https://www.sandag.org/uploads/projectid/projectid_189_27666.pdf, accessed July 14, 2020.

¹⁷ <https://www.sandag.org/index.asp?classid=12&subclassid=116&projectid=189&fuseaction=projec ts.detail>. Accessed November 1, 2019.

family and 8 multiple-family housing units. Until the City of Coronado updates the Housing Element of its General Plan, the potential contribution of the ALUCP to cumulative impacts on housing development cannot be determined. Nonetheless, given the potential for a substantial increase in Coronado's RHNA allocation, it is possible that implementation of the ALUCP could interact with the updated RHNA allocation and the updated Housing Element to create cumulative land use impacts.

6.3.6 Other ALUCPs in San Diego County

Since 2006, the ALUC has approved ALUCPs for 15 other airports in San Diego County (six rural, general aviation airports; five urban, general aviation airports; two Marine Corps air installations; one Navy air installation; and one commercial service airport), two of which affected land in the City of Coronado. Parts of the airspace protection boundaries and overflight areas of the San Diego International (SDIA) and Naval Outlying Landing Field Imperial Beach ALUCPs extend over parts of Coronado, as indicated in **Exhibit 3-10** in the Draft EIR. Exhibit 3-10- also depicts parts of the NASNI airspace protection boundary extending over the SDIA and Montgomery-Gibbs Airport Influence Areas. Adoption of the NASNI ALUCP will result in these areas of AIA overlap being subject to the airspace protection and overflight notification policies of the NASNI ALUCP, in addition to the airspace protection and overflight notification policies of the respective ALUCPs. This will not result in significant cumulative impacts for the following reasons:

- The airspace protection policies and standards of the affected ALUCPs are essentially the same, requiring observance of the 14 CFR Part 77 regulations and compliance with the FAA's Obstruction Evaluation/Airport Airspace Analysis process. Those policies and standards do not involve any limitation on the density or intensity of future land uses.
- The overflight notification policies of the affected ALUCPs are the same. Buyers of future housing development in the Airport Influence Areas are to be informed that the property is within an AIA and is subject to potential airport-related effects. The notification policies do not involve any limitation on the density or intensity of future land uses.

7.0 ALTERNATIVES ANALYZED IN THE EIR

A reasonable range of alternatives to the proposed Project that could potentially attain at least some of the objectives of the proposed Project must be described and evaluated under CEQA. Included in this range of alternatives must be the "No Project" alternative. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant impacts caused by the proposed Project.

An alternative may be eliminated from detailed consideration in the Draft EIR if it fails to meet most of the basic project objectives, is infeasible, or is unable to avoid significant environmental impacts.

As discussed in **Sections 5.4.3, 5.5.2, and 5.6.2** of the Final EIR, the ALUC is constrained by the requirement for the ALUCP to be consistent with the noise and safety standards of the Air Installations Compatible Use Zones (AICUZ)¹⁸ and to “be guided by information prepared and updated pursuant to Section 21674.5 and referred to as the Airport Land Use Planning Handbook...”¹⁹ The statute further explains that “it is the intent of the Legislature that local agencies shall be guided by the height, use, noise, safety, and density criteria that are compatible with airport operations, as established by this article, and referred to as the Airport Land Use Planning Handbook...”²⁰

The alternatives identified and subject to a detailed analysis in **Section 5.0** of the Final EIR are discussed below.

7.1 Alternative 1 – No Project

CEQA requires evaluation of the "No Project" alternative.²¹ Where the project is the "revision of an existing land use or regulatory plan . . . , the 'no project' alternative will be the continuation of the existing plan . . . into the future."²² Because an ALUCP has never been adopted for NASNI, the “No Project” alternative involves the continued applicability of the existing local agency land use planning and regulatory framework.

As discussed in **Section 5.4** of the Draft EIR, all environmental impacts associated with the Proposed Project, as described in the Initial Study²³ and in **Section 4.2.4** of the Draft EIR, would be avoided with the “No Project” alternative. The "No Project" alternative would only partially achieve one of the Project objectives and would fail to achieve the others, as described in **Table 5-2** in the Draft EIR and summarized below:

Objective 1: *Promote the compatibility of land uses within noise contours by:*

- a) *Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility*

The Noise Element of the Coronado General Plan describes single-family and multiple-family dwellings, schools, churches, libraries, parks and playgrounds as “clearly unacceptable” at noise levels above 75 dB CNEL. Mobile homes, auditoriums, and concert halls are considered “clearly unacceptable” above 70 dB CNEL. Land uses considered “normally unacceptable” include schools, churches, libraries, auditoriums, and concert halls above 60 dB CNEL, single-family and multiple-family dwellings, schools, churches, libraries, parks and playgrounds above 65 dB CNEL, and high-rise residences,

¹⁸ Pub. Util. Code, § 21675(b).

¹⁹ Public Util. Code §21674.7(a).

²⁰ Pub. Util. Code §21674.7(b).

²¹ California Code of Regulations, Title 14, §15126.6(e)(1).

²² California Code of Regulations, Title 14, §15126.6(e)(3)(A).

²³ Appendix A, Naval Air Station North Island Airport Land Use Compatibility Plan CEQA Initial Study, April 2019, Section 4, Environmental Impacts.

hotels, motels, golf courses, and riding stables above 70 dB CNEL.²⁴ No land use regulations implementing these provisions have been adopted by the City of Coronado. Therefore, those noise-sensitive land uses continue to be permitted under current Coronado zoning. Thus, this Project objective would not be satisfied by the “No Project” alternative.

- b) *Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards*

Although the implementation section of the Noise Element calls for the establishment of building code requirements ensuring adequate sound insulation for uses considered “normally unacceptable” in noise exposure areas,²⁵ no such regulations have been adopted by the City of Coronado. Therefore, this Project objective would not be satisfied by the “No Project” alternative.

Objective 2: Protect public safety by:

- a) *Limiting new risk-sensitive land uses within safety zones*

The Safety Element of the Coronado General Plan includes a policy stating that “the most current ‘Air Installations Compatible Use Zones Study’ ... will be consulted by the City prior to approval of any discretionary land use permit or approval that would modify the use, density, or intensity of development permitted for a property in said Compatible Use Zones.”²⁶ No corresponding land use regulations have been adopted by the City of Coronado. Therefore, this Project objective would not be satisfied by the “No Project” alternative.

- b) *Avoiding an increase in existing land use incompatibility within the safety zones*

See discussion of Safety Element of the Coronado General Plan, 2a) above. This Project objective would also not be satisfied by the “No Project” alternative.

Objective 3: Protect NASNI airspace and the safety of flight by:

- a) *Limiting the height of new structures and objects within the airspace protection boundary per Federal Aviation Administration (FAA) standards*

While the federal Part 77 regulations and state law enforcing FAA airspace determinations²⁷ are in effect, whether or not the Draft ALUCP is adopted, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Thus, compliance with the federal regulations in the airspace protection area is less than complete. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process in their

²⁴ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), Figure 2.

²⁵ *City of Coronado General Plan*, Chapter L, Noise Element, September 17, 1974, April 20, 1999 (Revised), p. II-L15.

²⁶ *City of Coronado General Plan*, Chapter K, Safety Element, February 15, 2005, p. II-K22.

²⁷ California Public Utilities Code, §§ 21657, 21659(b).

project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review. Therefore, this Project objective would not be satisfied by the “No Project” alternative.

b) *Limiting potential hazards to flight within the airspace protection boundary*

As noted above, while the federal Part 77 regulations and state law enforcing FAA airspace determinations²⁸ are in effect, some local agencies are not informing local developers of the FAA’s Obstruction Evaluation/Airport Airspace Analysis (OE/AAA) process. Without ALUCP policies directing compliance with Part 77, local agencies may not incorporate the OE/AAA process into their project reviews, potentially resulting in the construction by local developers of potential obstructions and hazards without FAA review. In addition, other potential hazards to flight would be less likely to be identified, including sources of glare; lighting that can interfere with vision or be confused with airport identification and navigational lighting; dust, water vapor, and smoke; thermal plumes; electromagnetic interference with communications, radar, and navigational signals; and bird attractants. Therefore, this Project objective would not be satisfied by the “No Project” alternative.

Objective 4: *Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA*

Without the AIA established in the proposed ALUCP, the buyer awareness measures of the state real estate law would apply to an area within two statute miles of NASNI,²⁹ and within other areas covered by the AIAs for San Diego International Airport, NOLF Imperial Beach, and Brown Field Municipal Airport. These combined areas are considerably smaller than the AIA in the proposed ALUCP. Therefore, this Project objective would only partially satisfy the “No Project” alternative.

Other major shortcomings of the “No Project” alternative include:

- Failure of the ALUC to achieve its statutory mandate to establish an ALUCP for NASNI³⁰
- Failure to reflect the most recent AICUZ study for NASNI in an ALUCP³¹
- Failure to consider the noise compatibility guidance in the 2011 Caltrans Handbook³²
- Failure to consider the safety compatibility guidance in the 2011 Caltrans Handbook³³

²⁸ California Public Utilities Code, §§ 21657, 21659(b).

²⁹ California Civil Code §1102.6a(d).

³⁰ California Public Utilities Code, §§ 21675(a) and (b).

³¹ California Public Utilities Code, § 21675(b).

³² California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-2 –3-5, 3-47 – 3-48, 4-1 – 4-12, 4-46.

³³ California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-11 –3-12, 3-47 – 3-48, 4-15 – 4-34, 4-41 – 4-43.

- Failure to apply guidance from the 2011 Caltrans Handbook for the avoidance of potential hazards to flight³⁴
- Failure to reflect the overflight notification guidance in the 2011 Caltrans Handbook³⁵

In conclusion, the “No Project” alternative would fail to fully meet all of the project objectives identified in **Section 5.3** of the Final EIR and would fail to consider the guidance in the Caltrans Handbook. Most importantly, the “No Project” alternative would fail to comply with state laws mandating the adoption of an ALUCP for NASNI³⁶ and that the ALUCP be consistent with the noise and safety policies of the AICUZ prepared for NASNI.³⁷

Finding: Based on the analysis in Section 5.4 of the Draft EIR, summarized above, the ALUC finds that Alternative 1 would avoid all environmental impacts of the proposed Project. However, Alternative 1 could only partially achieve Objective 4, but would fail to achieve Project Objectives 1, 2, and 3. This alternative would also fail in meeting the legal requirements that the ALUCP be consistent with the noise and safety standards of the AICUZ,³⁸ the ALUC adopt an ALUCP for NASNI,³⁹ and the ALUC be guided by the Caltrans Handbook in preparing the ALUCP.⁴⁰ Therefore, the ALUC finds that adoption of Alternative 1 would be inconsistent with the AICUZ, the intent of the *Handbook*, and ALUC statute and, therefore, is infeasible.

7.2 Alternative 2 – Elimination of Limits on Increases in Density and Intensity in Safety Zones

Alternative 2 was identified during the preparation of the proposed ALUCP policies and standards and based on scoping comments received from the City of Coronado. Alternative 2 would eliminate the limits on increases in existing residential density (number of dwelling units per acre) and existing nonresidential intensity (gross floor area) in the safety zones. Thus, this alternative would enable increases in existing residential density and nonresidential gross floor area up to the maximums allowed under current zoning.⁴¹ This alternative would not change the ALUCP standards limiting the

³⁴ California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-28 –3-36, 3-47 – 3-48, 4-34 – 4-41.

³⁵ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-8 –3-11, 3-47 – 3-48, 4-13 – 4-15.

³⁶ California Public Utilities Code § 21675(a).

³⁷ California Public Utilities Code § 21675(b).

³⁸ California Public Utilities Code § 21675(b).

³⁹ California Public Utilities Code § 21670.3, § 21675.

⁴⁰ California Public Utilities Code § 21674.7.

⁴¹ Changes in General Plan land use designations and rezonings to increase residential density and nonresidential intensity above the maximums allowed under current zoning would continue to be considered incompatible.

development of new, incompatible nonresidential land uses in the safety zones. The noise, airspace, and overflight policies and standards of the proposed ALUCP also would remain unchanged.

This alternative was developed recognizing that most of the displacement impacts attributable to the proposed ALUCP would be caused by the limits on increases in residential density and nonresidential floor area. Thus, Alternative 2 would reduce, but not fully eliminate, the environmental displacement impacts of the proposed ALUCP.

An evaluation of Alternative 2 revealed that it would only partially achieve some of the Project objectives and would fail to achieve others, as described in the Final EIR and summarized below (refer to **Section 5.5** and **Table 5-5** of the Final EIR for greater detail):

Objective 1: Promote the compatibility of land uses within noise contours by:

- a) *Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility*

While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses in the portion of the 65 dB CNEL contour within the safety zones (just as the proposed ALUCP), it would allow the potential development of up to 36 new residential units in those areas. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and state law which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, noise criteria established in the Airport Land Use Planning Handbook.⁴²

- b) *Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards*

The noise level reduction standards of the proposed ALUCP would be unchanged with Alternative 2.

Objective 2: Protect public safety by:

- a) *Limiting new risk-sensitive land uses within safety zones*

While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses within the safety zones (just as the proposed ALUCP), the potential development of up to 36 new residential units in those areas would be possible. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and state law which discourages the development of incompatible

⁴² California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

land uses near airports and advises local agencies to be guided by, among other factors, safety criteria established in the Airport Land Use Planning Handbook.⁴³

- b) *Avoiding an increase in existing land use incompatibility within the safety zones*

While implementation of Alternative 2 would limit the development of new incompatible nonresidential land uses in the safety zones, the potential development of up to 36 new residential units and 41,873 to 63,573 square feet of nonresidential development expansion in those areas would be possible. Given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development would occur with this alternative. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and state law which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, safety criteria established in the Airport Land Use Planning Handbook.⁴⁴

Objective 3: *Protect NASNI airspace and the safety of flight by:*

- a) *Limiting the height of new structures and objects within the airspace protection boundary per FAA standards*

The airspace protection policies and standards of the proposed ALUCP would be unchanged with Alternative 2.

- b) *Limiting potential hazards to flight within the airspace protection boundary*

The flight safety policies and standards of the proposed ALUCP would be unchanged with Alternative 2.

Objective 4: *Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA*

The overflight notification policy of the proposed ALUCP would be unchanged with Alternative 2.

Finding: **Based on the analysis in Section 5.5 of the Draft EIR, summarized above, the ALUC finds that Alternative 2 would not avoid or substantially lessen any of the significant impacts of the proposed Project. And, while Alternative 2 would achieve Project Objectives 3 and 4, would partially**

⁴³ ~~California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-26—3-27, 3-47—3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards. [ibid.](#)~~

⁴⁴ ~~California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-26—3-27, 3-47—3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards. [ibid.](#)~~

achieve Objective 1, but would fail to achieve Objective 2, the small reduction in environmental impacts is not great enough to warrant adoption of Alternative 2 in place of the proposed Project. Furthermore, this alternative would fail in meeting the legal requirements that the ALUCP be consistent with the noise and safety standards of the AICUZ⁴⁵ and the ALUC be guided by the noise and safety criteria of the Caltrans Handbook in preparing the ALUCP.⁴⁶ Therefore, the ALUC finds that adoption of Alternative 2 would be inconsistent with the AICUZ, the intent of the *Handbook*, and ALUC statute and, therefore, is infeasible.

7.3 Alternative 3 – Application of ALUCP Noise and Safety Standards Only to Parcels Sited Completely Inside Noise Contours or Safety Zones

The boundaries of the proposed ALUCP noise contours and safety zones split many parcels. A proposed ALUCP policy states that new or reconstructed buildings would be subject to the standards of the safety zone and/or noise contour in which the greatest proportion of habitable space of a residential building or gross floor area of a nonresidential building is located.

Alternative 3 would apply the noise and safety standards of each noise contour range and safety zone only to parcels that are sited completely within a given noise contour range and/or safety zone. Parcels that are split by those boundaries would have to comply with the standards of the less restrictive noise contour range or safety zone. Thus, a parcel split by the 70 dB CNEL contour would have to comply with the standards of the 65 to 70 dB CNEL range. Parcels split between APZ I and APZ II would have to comply with the standards of the APZ II safety zone. Parcels that are split by the 65 dB CNEL contour would not be subject to any noise standards. Parcels that are partially inside a safety zone and partially outside any other safety zone would not be subject to any safety standards.

Thirty-six parcels that would be subject to the proposed ALUCP would be exempted from the ALUCP under Alternative 3. These parcels have more than 50 percent of their area within the safety zones or 65 dB CNEL contour, while the remainder of their area lies outside any safety zone or noise contour.

An evaluation of Alternative 3 revealed that it would only partially achieve some of the Project objectives and would fail to achieve others, as described in the Final EIR and summarized below (refer to **Section 5.6** and **Table 5-8** of the Final EIR for greater detail):

Objective 1: Promote the compatibility of land uses within noise contours by:

⁴⁵ California Public Utilities Code § 21675(b).

⁴⁶ California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

- a) *Limiting new noise-sensitive development within the 65 dB CNEL and higher noise contours to avoid an increase in existing land use incompatibility*

With Alternative 3, three multiple-family zoned lots within the 65 dB CNEL contour would be removed from APZ I, enabling an additional 2 multiple-family residential units to be developed in those areas compared with the proposed ALUCP. By failing to limit the increase in land use incompatibility, this alternative would also conflict with the AICUZ and state law which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, noise criteria established in the Airport Land Use Planning Handbook.⁴⁷

- b) *Ensuring that any new noise-sensitive development within the 65 dB CNEL and higher noise contours meets interior sound level standards*

By effectively removing approximately 14 single-family residential-zoned lots from within the 65 dB CNEL contour, Alternative 3 would increase the number of noise-sensitive land uses that could be expanded without being treated to reduce interior sound levels per the proposed ALUCP, including reconstructed homes and accessory dwelling units. This alternative also implicitly reduces the size of the AICUZ noise contours by removing split parcels from providing the level of sound reduction necessary to attenuate noise in the higher noise contour range. This makes this alternative inconsistent with the standards of the AICUZ and state law, which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, noise criteria established in the Airport Land Use Planning Handbook.⁴⁸

Objective 2: Protect public safety by:

- a) *Limiting new risk-sensitive land uses within safety zones*

By effectively removing 22 properties (16 single-family zoned, 3 multiple-family zoned, 2 commercial zoned, and 1 hotel-motel zoned) from the safety zones, Alternative 3 would increase the number of risk-sensitive land uses that could potentially be developed within the safety zones. As indicated in **Table 5-6** of the Final EIR, two additional multiple-family residential units could potentially be developed. As indicated in **Table 5-7** of the Final EIR, an additional 3,280 square feet of leasable area in existing buildings and 31,451 square feet of land area would become available for the development of new incompatible nonresidential land uses. This alternative also implicitly reduces the size of the safety

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

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

zones by removing split parcels from the need to comply with standards of the more restrictive safety zone. This makes this alternative inconsistent with the standards of the AICUZ and state law, which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, safety criteria established in the Airport Land Use Planning Handbook. .⁴⁹

- b) *Avoiding an increase in existing land use incompatibility within the safety zones*

By effectively removing 22 properties from the safety zones, Alternative 3 would increase the number of properties, where existing incompatible development could be expanded. An additional 2 new multiple-family residential units and 41,873 to 63,573 square feet of nonresidential development expansion could occur. Given the maximum development intensity permitted in the H-M zoning district (FAR of 1.8), a risk, however remote, of substantially greater development would occur with this alternative. This alternative also implicitly reduces the size of the safety zones by removing split parcels from the need to comply with standards of the more restrictive safety zone, potentially allowing the development of 2 more multiple-family residential units than the proposed ALUCP. This makes this alternative inconsistent with the standards of the AICUZ and state law, which discourages the development of incompatible land uses near airports and advises local agencies to be guided by, among other factors, safety criteria established in the Airport Land Use Planning Handbook. .⁵⁰

Objective 3: Protect NASNI airspace and the safety of flight by:

- a) *Limiting the height of new structures and objects within the airspace protection boundary per FAA standards*

The airspace protection policies and standards of the proposed ALUCP would be unchanged with Alternative 3.

- b) *Limiting potential hazards to flight within the airspace protection boundary*

The flight safety policies and standards of the proposed ALUCP would be unchanged with Alternative 3.

Objective 4: Promote awareness to prospective buyers of new housing regarding the potential effects of aircraft overflights within the AIA

⁴⁹ ~~California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-26—3-27, 3-47—3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards. [ibid.](#)~~

⁵⁰ ~~California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011, pp. 3-26—3-27, 3-47—3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards. [ibid.](#)~~

The overflight notification policy of the proposed ALUCP would be unchanged with Alternative 3.

Finding: Based on the analysis in Section 5.6 of the Draft EIR, summarized above, the ALUC finds that Alternative 3 would not avoid or substantially lessen any of the significant impacts of the proposed Project, because appreciable quantities of potential displacement would remain in both residential and nonresidential land use categories. And, while Alternative 3 would achieve two of the four Project Objectives (3 and 4), it would fail to achieve Objectives 1 and 2. Furthermore, this alternative would fail in meeting the legal requirements that the ALUCP be consistent with the noise and safety standards of the AICUZ⁵¹ and the ALUC be guided by the Caltrans Handbook in preparing the ALUCP,⁵² Therefore, the ALUC finds that adoption of Alternative 3 would be inconsistent with the AICUZ, the intent of the Caltrans Handbook, and ALUC statute and, therefore, is infeasible.

8.0 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

An EIR must discuss any potentially significant effects on the environment that would be irreversible if the proposed project were implemented.⁵³ As discussed in **Section 4.3** of the Draft EIR, the NASNI ALUCP is a land use planning policy document, and no significant irreversible environmental changes would result from its approval and implementation. Specifically, because implementation of the ALUCP will not propose or entail any new development, construction, or changes to the existing land uses or the environment, the proposed Project will not require the commitment or use of any nonrenewable resources. Accordingly, the NASNI ALUCP will not result in significant irreversible environmental changes stemming from the use of nonrenewable resources or the irretrievable commitment of resources.

9.0 GROWTH-INDUCING IMPACTS

An EIR also must discuss the "ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."⁵⁴ As discussed in **Section 4.4** of the Draft EIR, the NASNI ALUCP does not directly facilitate growth as it does not contain any

⁵¹ California Public Utilities Code § 21675(b).

⁵² California Public Utilities Code § 21674.7. For guidance relating to the development of ALUCP policies for military airports, see California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011, pp. 3-26 – 3-27, 3-47 – 3-48. These portions of the Handbook advise ALUCs to consider AICUZ compatibility criteria as minimum standards. ALUCs are advised to review and revise the AICUZ criteria as necessary to apply to local conditions. ALUCs are also advised to consider setting higher standards.

⁵³ California Public Resources Code, §21100(b)(2)(B); California Code of Regulations, Title 14, §15126.2(c).

⁵⁴ California Code of Regulations, Title 14, §15162.2(d); California Public Resources Code, §21100(b)(5).

growth-accommodating features (e.g., infrastructure). Further, the proposed Project does not directly necessitate the construction of growth-accommodating facilities, because the Project, which is a planning policy document, will not directly attract residential and/or non-residential growth.

The NASNI ALUCP may indirectly displace planned land uses from certain areas within the ALUCP Area of Potential Impact, potentially setting in motion a chain of events that could induce growth in areas outside the ALUCP Area of Potential Impact. However, it is entirely speculative whether any such displacement would actually occur at all, given the built-out nature of a stable community of long establishment. There is a range of potential outcomes that could occur with implementation of the proposed ALUCP.

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

As explained in **Section 4.4** of the Final EIR, it is not possible to predict how the real estate market, local developers, and property owners would respond to the displacement of potential development from the ALUCP Area of Potential Impact. While some of the displaced development may induce growth in certain areas outside the ALUCP Area of Potential Impact, it is impossible to predict the location and magnitude of such an effect. Any development that would be displaced from the ALUCP Area of Potential Impact would be subject to existing land use plans and regulations that apply outside the ALUCP Area of Potential Impact. Therefore, it can reasonably be concluded that implementation of the proposed ALUCP would result in less than significant growth-inducing impacts, because the development that would be displaced is allowed in other parts of the City of Coronado under existing land use plans and regulations.

10.0 ABSENCE OF SIGNIFICANT NEW INFORMATION

The CEQA Guidelines require a Lead Agency to recirculate an EIR for further review and comment, when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR, but before certification.⁵⁵ New

⁵⁵ California Code of Regulations, Title 14, §15088.5.

information includes: (i) changes to the project; (ii) changes in the environmental setting; or (iii) additional data or other information.⁵⁶ The CEQA Guidelines further provide that "[n]ew information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."⁵⁷

Here, the Final EIR incorporated a number of changes and revisions to the proposed Project. However, these changes and revisions do not result in any new significant environmental impacts or a substantial increase in the severity of an environmental impact, which cannot be mitigated. In addition, all feasible mitigation measures are included in the MMRP, which is hereby adopted and incorporated into the Project. Therefore, having reviewed the information in the Final EIR, the administrative record, the requirements of the CEQA Guidelines, and applicable judicial authority, the ALUC hereby finds that no new significant information was added to the Draft EIR following public review and thus recirculation of the EIR is not required by CEQA.

11.0 PAYMENT OF FISH AND GAME FILING FEE

As discussed above, an Initial Study was prepared by ALUC staff in order to evaluate the NASNI ALUCP's potential to result in adverse environmental impacts. Based on the information presented in the Initial Study, and the record as a whole, there is no substantial evidence before the ALUC that the NASNI ALUCP may result in a significant adverse effect on wildlife resources or the habitat on which the wildlife depends. Nevertheless, because an EIR has been prepared for the NASNI ALUCP, the Airport Authority will remit the required filing fees to the San Diego County Clerk at the time of filing the Notice of Determination in compliance with state law.⁵⁸

12.0 MITIGATION MONITORING AND REPORTING PLAN (MMRP)

Pursuant to Public Resources Code section 21081.6, the ALUC is required to adopt an MMRP for the proposed Project in order to ensure compliance with the adopted mitigation measures during project implementation.⁵⁹ The ALUC finds that the impacts of the proposed Project have been mitigated to the extent feasible by the mitigation measures identified in the Final EIR and MMRP. Further, by these findings, the ALUC adopts the MMRP (see Attachment B) that accompanies the Final EIR.

The ALUC reserves the right to make amendments or substitutions to the mitigation measures, if it is determined that the amended or substituted measure will mitigate the identified potential environmental impact to at least the same degree as the

⁵⁶ California Code of Regulations, Title 14, §15088.5.

⁵⁷ California Code of Regulations, Title 14, §15088.5.

⁵⁸ California Fish and Game Code, §711.4 (d)(3).

⁵⁹ Also, see California Code of Regulations., Title 14, §15091(e).

original measure, and if the amendment or substitution would not result in a significant new environmental impact that cannot be mitigated.

13.0 STATEMENT OF OVERRIDING CONSIDERATIONS

The Final EIR for the NASNI ALUCP identified significant and unavoidable impacts to Land Use and Planning that may result from implementation of the proposed Project. These impacts are summarized in the findings above, adopted by the Board of the Airport Authority, acting in its capacity as the ALUC for the County, pursuant to section 15091 of Title 14 of the California Code of Regulations.

CEQA requires the decision-making body to balance the economic, legal, social, technological, or other benefits of a project against its significant and unavoidable impacts when determining whether to approve a project.⁶⁰ If the benefits of a project outweigh the significant and unavoidable impacts, those impacts may be considered acceptable. CEQA also requires the public agency to provide written findings supporting the specific reasons for considering a project acceptable when significant impacts are unavoidable. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record. Those reasons are provided in this Statement of Overriding Considerations.

The Airport Authority finds that the economic, social, and other benefits of the proposed Project outweigh the significant and unavoidable impacts identified in the Final EIR and elsewhere in the record. In making this finding, the Airport Authority has balanced the benefits of the proposed Project against its significant and unavoidable environmental impacts and has indicated its willingness to accept those impacts in light of the benefits to the community surrounding NASNI and the benefits associated with protecting the long-term viability of NASNI that would stem from Project approval. The Airport Authority further finds that each one of the following benefits of the proposed Project, independent of the other benefits, warrant approval of the proposed Project notwithstanding the significant and unavoidable impacts of the proposed Project:

1. The proposed Project is consistent with the noise and safety standards provided in the 2011 AICUZ study for NASNI. Therefore, adoption of the proposed Project ensures that the Airport Authority complies with existing state law when adopting an ALUCP for NASNI.⁶¹
2. In addition to ensuring that the Airport Authority complies with state law by adopting an ALUCP that is consistent with the AICUZ, the Airport Authority also assists in supporting the Department of Navy's continued operation of NASNI and concurrently protecting public health, safety and welfare and safeguarding the general welfare of the inhabitants within the vicinity of NASNI. In addition, by adopting an ALUCP that is consistent with the AICUZ, the Airport Authority strengthens the AICUZ recommendations of the Department of Navy to ensure the military mission of the air installation as a matter of national security without

⁶⁰ California Code of Regulations, Title 14, §15093.

⁶¹ Pub. Util. Code §21675(b).

undue encroachment by incompatible uses that would restrict operations while concurrently protecting the public health, safety, and welfare.

3. The Airport Authority has duly considered the guidance provided in the *California Airport Land Use Planning Handbook*,⁶² published by the Caltrans Division of Aeronautics, as required by law.⁶³ Furthermore, the proposed Project is consistent with the *Handbook* guidance. Therefore, adoption of the proposed Project ensures that the Airport Authority complies with existing state law when adopting an ALUCP for NASNI.
4. The proposed Project will assist the Airport Authority and local agencies (specifically, the cities of Chula Vista, Coronado, Imperial Beach, National City and San Diego, the County of San Diego, and the San Diego Unified Port District) in ensuring that future land use development within the vicinity of NASNI is compatible with the Airport's operations.
5. The proposed Project will enable the Airport Authority to coordinate land use planning at the local level in order to provide for the orderly development of NASNI, while at the same time protecting the public health, safety, and welfare, as required by the State Aeronautics Act.⁶⁴
6. The proposed Project will protect the public health, safety, and general welfare of the inhabitants within the vicinity of NASNI and the public in general by establishing land use measures that minimize the public's exposure to excessive noise and safety hazards to the extent that these areas are not already devoted to incompatible uses. This is of particular importance with respect to the policies and standards related to the future development of noise-sensitive land uses and other land uses posing safety concerns (e.g., facilities serving people with low effective mobility) near NASNI.
7. The proposed Project will promote the continued operation of NASNI, to the extent that the aeronautical activities otherwise could be impacted by adjacent land use development, in accordance with its mission and operational capabilities.

The Airport Authority hereby finds that each of the reasons stated above constitutes a separate and independent basis of justification for the Statement of Overriding Considerations, and each is able to independently support the Statement of Overriding Considerations and override the significant and unavoidable environmental effects of the proposed Project. In addition, each reason is independently supported by substantial evidence contained in the administrative record.

⁶² California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, 2011.

⁶³ Pub. Util. Code, §21674.7(a).

⁶⁴ Public Util. Code, §21670(a).

14.0 CUSTODIAN OF RECORD

Public Resources Code section 21081.6, subdivision (a)(2), requires the Lead Agency (*i.e.*, the Airport Authority, acting in its capacity as the ALUC) to specify the location and custodian of the documents or other material that constitute the record of proceedings, upon which the decision is based.⁶⁵

The custodian of the record for the proposed Project is the Airport Authority. The documents constituting the record are available to the public during ordinary business hours at the Airport Authority's offices, which are located at 3225 North Harbor Drive, San Diego, California 92101.

⁶⁵ Also, see California Code of Regulations, Title 14, §15091(e).

ATTACHMENT B

MITIGATION MONITORING AND REPORTING PROGRAM NAVAL AIR STATION NORTH ISLAND AIRPORT LAND USE COMPATIBILITY PLAN

AUTHORITY

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Section 21081.6 of the California Public Resources Code in order to provide for the monitoring of mitigation measures required for the proposed Naval Air Station North Island (NASNI) Airport Land Use Compatibility Plan (ALUCP), as set forth in the Final Environmental Impact Report (EIR) prepared for the proposed ALUCP.¹ (The Final EIR consists of the Draft EIR (December 2019), Final EIR (September 2020).)

Concurrent with certification of the Final EIR, the MMRP will be adopted by the San Diego County Regional Airport Authority (Airport Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County and the lead agency for the proposed ALUCP. The MMRP will be kept on file in the offices of the Airport Authority, located at 3225 North Harbor Drive, San Diego, California 92101.

MONITORING REQUIREMENTS

The Airport Authority will be responsible for ensuring compliance with the MMRP to the extent it is able. Importantly, as noted in the Final EIR, implementation of the mitigation measures on pages 4-48 and 4-49 of the Draft EIR are within the responsibility and jurisdiction of the City of Coronado, rather than the Airport Authority. The City may elect not to implement the mitigation measures identified by the Airport Authority. In that instance, the impacts to Land Use and Planning identified and analyzed in the Final EIR would remain significant and unavoidable.

Although the Airport Authority does not have the capacity to require implementation of these mitigation measures, it will collaborate with the City of Coronado in implementing the mitigation measures, if the City requests the assistance of the Airport Authority. Specifically, the Airport Authority, acting in its capacity as the ALUC, will coordinate with the City to facilitate its efforts to make its Zoning Code consistent with the proposed ALUCP. The Airport Authority will also coordinate with the City of Coronado, if the City chooses to amend its General Plan and any specific plans to reflect policies, standards, and guidelines in the ALUCP.²

REPORTING REQUIREMENTS, AND CHANGES TO MITIGATION MEASURES

Any substantive change(s) in the MMRP made by the Airport Authority shall be recorded in writing. Reference to such change(s) shall be made in the Mitigation Monitoring Report

¹ Also, see California Code of Regulations, Title 14, §15097.

² The City's General Plan and specific plans do not conflict with the NASNI ALUCP and do not require amendment. Amendments may be helpful, however, by incorporating ALUCP policy guidance into the General Plan, thus providing a local policy basis for the required zoning amendments.

prepared by the Airport Authority no earlier than one hundred eighty (180) days following approval of the proposed ALUCP.

Modifications to the mitigation measures may be made by the Airport Authority subject to one of the following findings, documented by evidence in the record:

- (a) The mitigation measure included in the Final EIR and the MMRP is no longer required because the significant environmental impact identified in the Final EIR has been found not to exist, or to occur at a level which makes the impact less than significant as a result of changes in the ALUCP, changes in conditions of the environment, or other factors.

OR

- (b) The modified or substitute mitigation measure to be included in the MMRP provides a level of environmental protection equal to or greater than that afforded by the mitigation measure included in the Final EIR and the MMRP; and

The modified or substitute mitigation measure does not have significant adverse effects on the environment in addition to or greater than those that were considered by the Airport Authority in its decisions on the Final EIR and the proposed ALUCP; and

The modified or substitute mitigation measure is feasible, and the affected Airport Authority, through measures included in the MMRP or its procedures, can assure its implementation.

SUPPORT DOCUMENTATION

Findings and related documentation supporting the modifications to mitigation measures shall be maintained in the project file with the MMRP and shall be made available to the public upon request.

FORMAT OF MITIGATION MONITORING MATRIX

The following matrix identifies the environmental issue areas for which mitigation is required, the required mitigation measures, the time frame for monitoring, and the responsible monitoring agencies.

**SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY
NASNI ALUCP, MITIGATION MONITORING AND REPORTING PROGRAM**

MITIGATION MEASURES	TIME FRAME/ MONITORING MILESTONE	RESPONSIBLE MONITORING PARTY
LAND USE AND PLANNING		
1 Following adoption of the NASNI ALUCP, the City of Coronado can and should amend its land use regulations to achieve consistency with the NASNI ALUCP.	Within 180 Days of ALUCP Adoption	City of Coronado
2 Following adoption of the NASNI ALUCP, the City of Coronado can and should amend its General Plan, relevant specific plans, and Zoning Code to increase the allowable residential density or nonresidential development intensity (e.g., floor area ratios) in selected areas outside the ALUCP safety zones to compensate for the future development displaced from the safety zones.	Within 180 Days of ALUCP Adoption	City of Coronado
NOTE: Potential mitigation measures are discussed in the third paragraph of Section 4.2.5 of the Draft EIR (pages 4-48 and 4-49).		

RESOLUTION NO. 2020-0002

A RESOLUTION OF THE AIRPORT LAND USE
COMMISSION FOR SAN DIEGO COUNTY,
ADOPTING THE AIRPORT LAND USE
COMPATIBILITY PLAN FOR NAVAL AIR STATION
NORTH ISLAND

WHEREAS, the San Diego County Regional Airport Authority (Airport Authority), acting in its capacity as the Airport Land Use Commission (ALUC) for San Diego County, is required to prepare and adopt an Airport Land Use Compatibility Plan (ALUCP) for Naval Air Station North Island (NASNI) (see Pub. Util. Code, §21670.3(a); 21675(b)); and

WHEREAS, the ALUC is required to prepare and adopt an ALUCP for each public-use and military airport and the areas surrounding such airport within its jurisdiction in order to provide for the orderly growth of that airport and safeguard the general welfare of the public (Pub. Util. Code, §§21674(c); 21675(b)); and

WHEREAS, ALUCPs are the fundamental tool used by ALUCs in fulfilling their purpose of promoting airport land use compatibility; and

WHEREAS, the ALUC is required to be guided by the *California Airport Land Use Planning Handbook*, State of California, Department of Transportation Division of Aeronautics (Caltrans *Handbook*) in preparing ALUCPs (Pub. Util. Code, §21674.7(a)); and

WHEREAS, an Air Installations Compatible Use Zones (AICUZ) study update for Naval Air Station North Island (NASNI) was completed in 2011, intended to serve as a guide for the review and update of the community plans and general plans for the City of Coronado in order to protect the health, safety and welfare of those living near a military airfield while preserving the operational capability of the airfield; and

WHEREAS, ALUCPs for military airports are required to be “consistent with the safety and noise standards” in the AICUZ prepared for that airport (Pub. Util. Code §21675(b)); and

WHEREAS, the ALUC, the lead agency for the NASNI ALUCP, also prepared and circulated an Environmental Impact Report (EIR) for the proposed ALUCP in accordance with the requirements of the California Environmental Quality Act (CEQA), which is set forth in the Public Resources Code, section 21000 et seq.), and the State CEQA Guidelines (CEQA Guidelines), which are set forth in the California Code of Regulations, Title 14, section 15000 et seq., and the Airport Authority's own CEQA Procedures; and

WHEREAS, the ALUC held a scoping meeting on May 6, 2019, in order to provide additional opportunity for public comment on the proposed ALUCP; and

WHEREAS, the ALUC provided the public the opportunity to comment on the proposed NASNI ALUCP for sixty-two (62) days, beginning on December 19, 2019, and concluding on February 18, 2020; and

WHEREAS, the ALUC provided notice of the opportunity to comment on the proposed ALUCP to interested individuals, organizations, agencies, and the affected local agencies (i.e., the cities of Chula Vista, Coronado, Imperial Beach, National City, and San Diego; the County of San Diego; and the San Diego Unified Port District); and

WHEREAS, the ALUC received fifty five (55) written public comments on the NASNI ALUCP from state/local agencies, organizations and individuals; and

WHEREAS, the ALUC staff prepared detailed individual responses to each of the comment letters received on the Draft EIR, as well as eighteen (18) topical responses for areas addressed in a number of the comment letters received on the Draft EIR; and

WHEREAS, the ALUC also made minor changes to the proposed ALUCP to provide clarifying information related to definitions, exemptions from ALUC review, ALUC review details, local agency ALUCP implementation options, and ALUC project submission requirements; and

WHEREAS, on August 20, 2020, the ALUC made available to the public: (i) minor revisions to the proposed ALUCP (as necessary and/or in response to comments received) depicted in redline/strikeout, (ii) comments received during the public comment period that were bracketed by issue, and (iii) responses to public comments on the ALUCP; and

WHEREAS, in conjunction with extensive public outreach, community involvement and collaboration efforts between the ALUC, NASNI Working Group, affected local agencies and the general public, the ALUC has prepared an ALUCP for NASNI that is consistent with the overall objectives of the State Aeronautics Act, consistent with the noise and safety policies in the 2011 NASNI AICUZ study, and the guidance provided by the Caltrans *Handbook*; and

WHEREAS, the ALUC held a duly noticed public meeting on September 3, 2020, to receive and consider public testimony with respect to the NASNI ALUCP and the completeness and adequacy of the Final EIR for the proposed ALUCP; and

WHEREAS, the ALUC has reviewed all of the CEQA documentation for the NASNI ALUCP and determined that, on the basis of the whole record before it, there is substantial evidence that the proposed ALUCP will have a significant and unavoidable impact on Land Use and Planning; this impact is acceptable in light of the benefits identified in the Statement of Overriding Considerations; the Final EIR reflects the ALUC's independent judgment and analysis; and, the Final EIR is complete, adequate and fully complies with all requirements of CEQA, the State CEQA Guidelines and the Airport Authority's CEQA Procedures; and

WHEREAS, on September 3rd, 2020, the ALUC approved Resolution No. 2020-0001 ALUC certifying the Final EIR prepared for the NASNI ALUCP on the basis of the findings summarized above and more extensively detailed in Resolution No. 2020-0001.

NOW, THEREFORE, BE IT RESOLVED that the ALUC approves and adopts the Airport Land Use Compatibility Plan for Naval Air Station North Island.

BE IT FURTHER RESOLVED by the ALUC that it finds that this ALUC action is not a "development" as defined by the California Coastal Act (Pub. Res. Code §30106).

PASSED, ADOPTED, AND APPROVED by the ALUC for San Diego County at a regular meeting this 3rd day of September 2020, by the following vote:

AYES: Commissioners:

NOES: Commissioners:

ABSENT: Commissioners:

ATTEST:

TONY R. RUSSELL
DIRECTOR, BOARD SERVICES/
AUTHORITY CLERK

APPROVED AS TO FORM:

AMY GONZALEZ
GENERAL COUNSEL

Item 3 & 4

**AIRPORT
LAND USE
COMMISSION**

**Certification of an Environmental
Impact Report for the Naval Air Station
North Island - Airport Land Use
Compatibility Plan and Adoption of the
Naval Air Station North Island - Airport
Land Use Compatibility Plan**

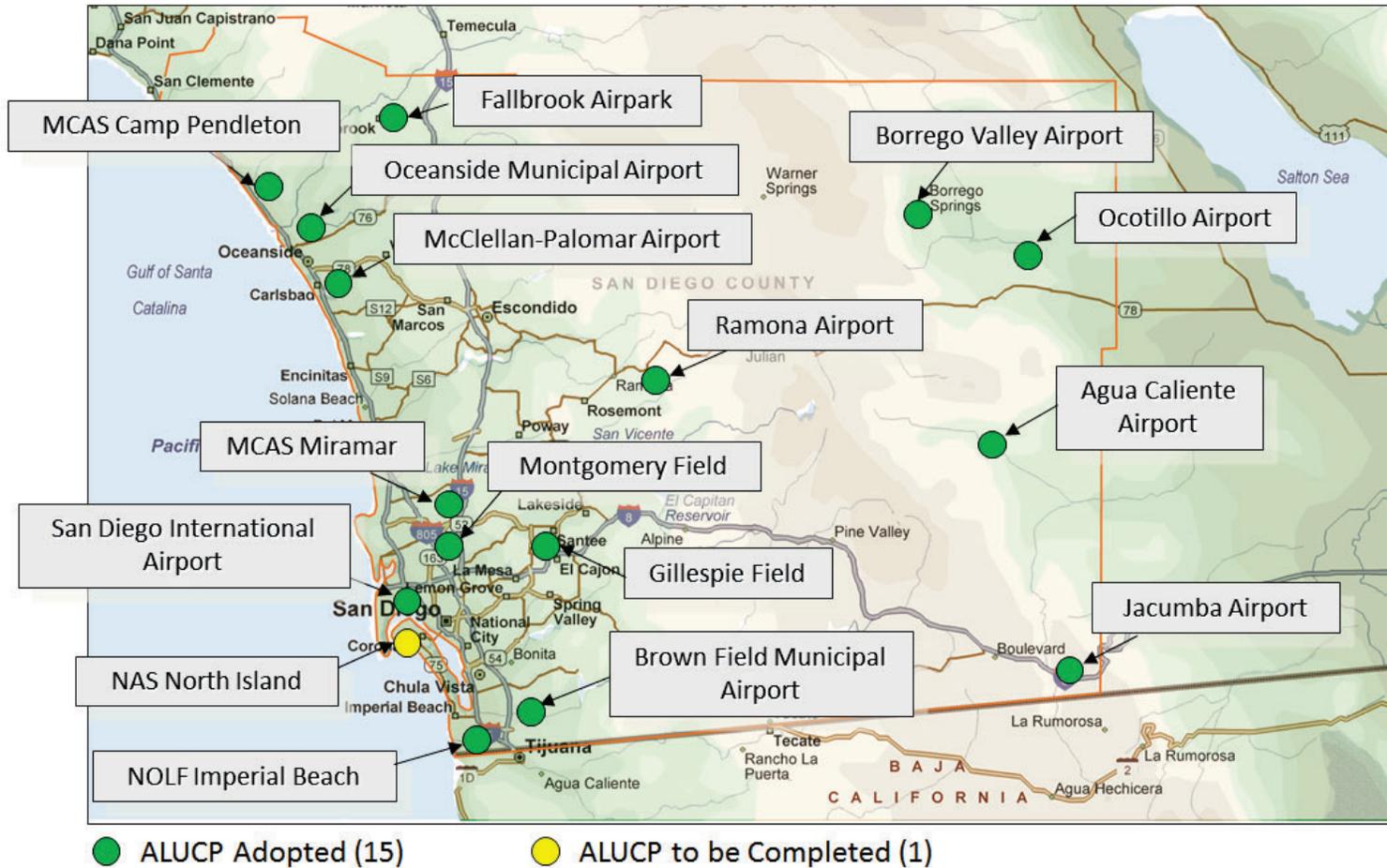
September 3, 2020

Presented by:

Ralph Redman

Manager, Planning & Environmental Affairs

ALUCP Adoption Status



ALUC Must Prepare an Airport Land Use Compatibility Plan (ALUCP)*

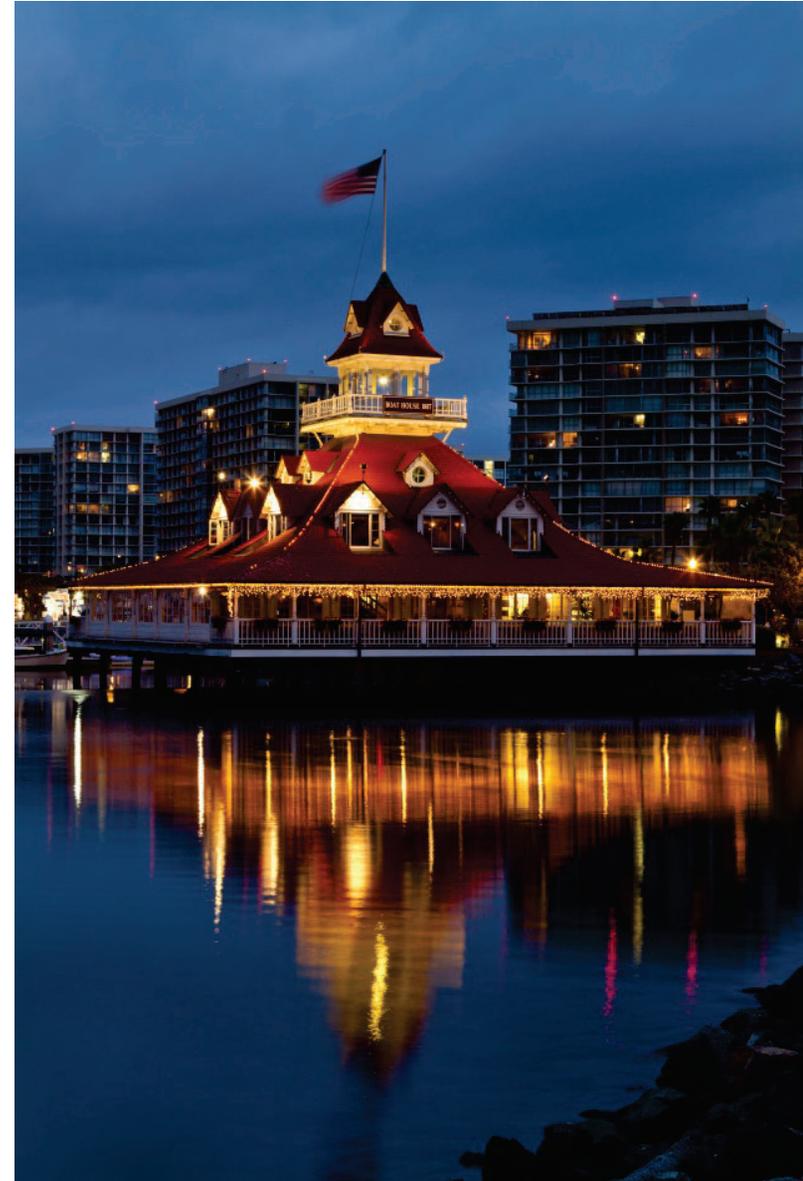
“...[T]hat will provide for the **orderly growth** of each public airport and the area surrounding the airport within the jurisdiction of the commission, and will **safeguard the general welfare** of the inhabitants within the vicinity of the airport and the public in general...”

...[T]hat shall include, within its airport land use compatibility plan formulated pursuant to subdivision (a), the area within the jurisdiction of the commission surrounding any **military** airport...”

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

ALUCP Overview

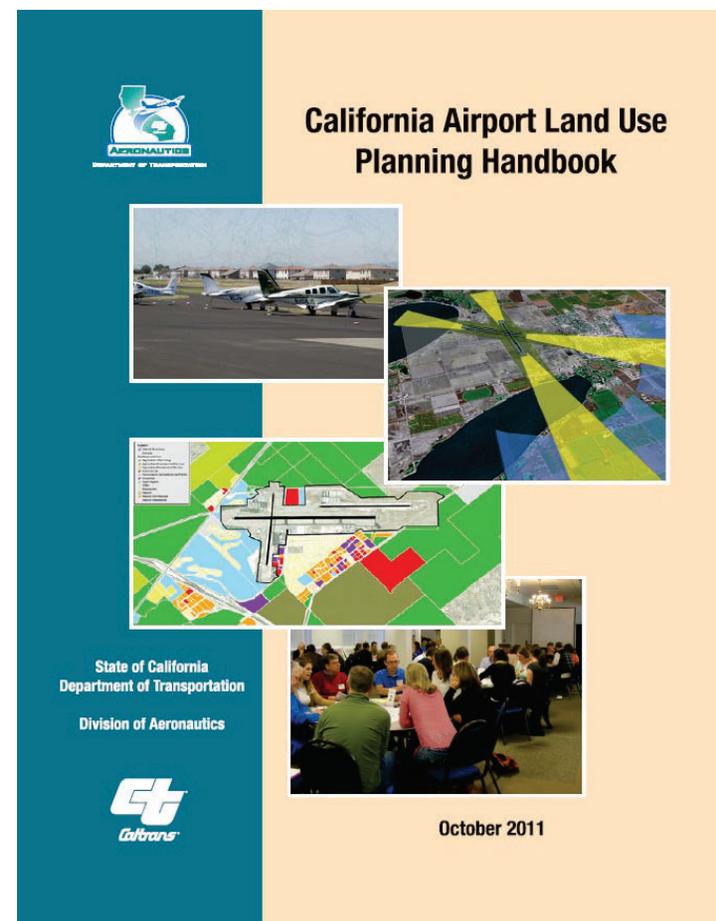
AIRPORT
LAND USE
COMMISSION



Role of Caltrans *Handbook*

- An ALUC that prepares an ALUCP “shall be guided by information [in] the [Caltrans] *Airport Land Use Planning Handbook*.”

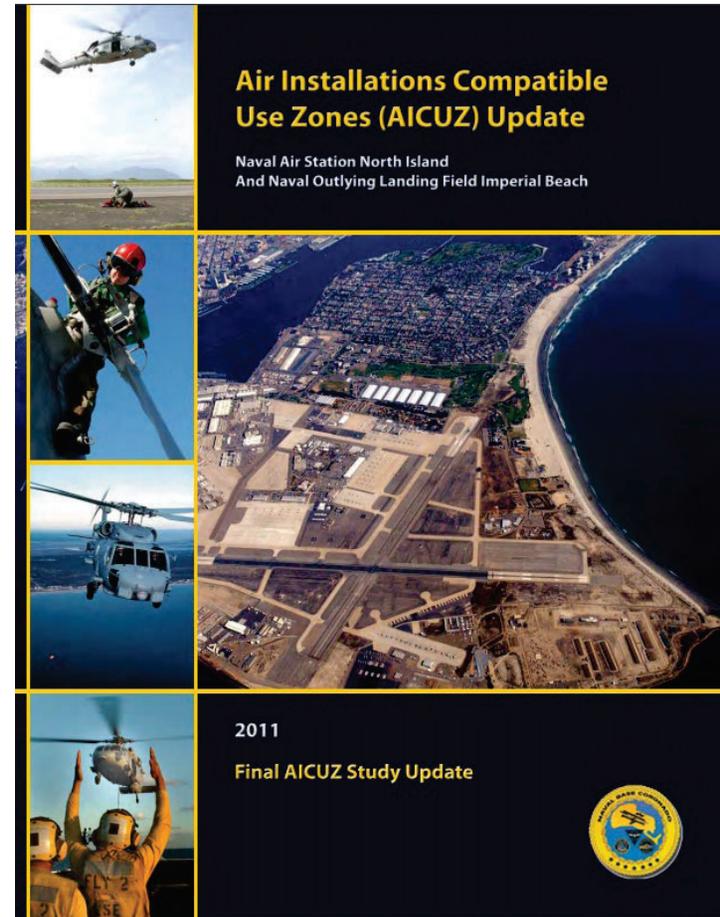
[California Public Utilities Code §21674.7(a)]



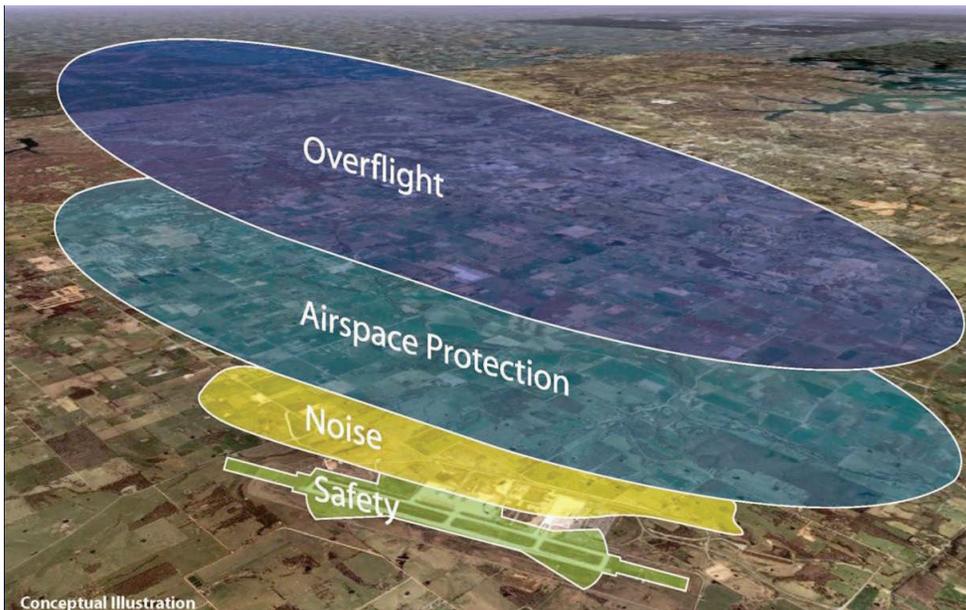
Role of AICUZ

- ALUCPs “shall be consistent with the safety and noise standards in the Air Installations Compatible Use Zones (AICUZ) study prepared for that military airport.”

PUC §21675(b)



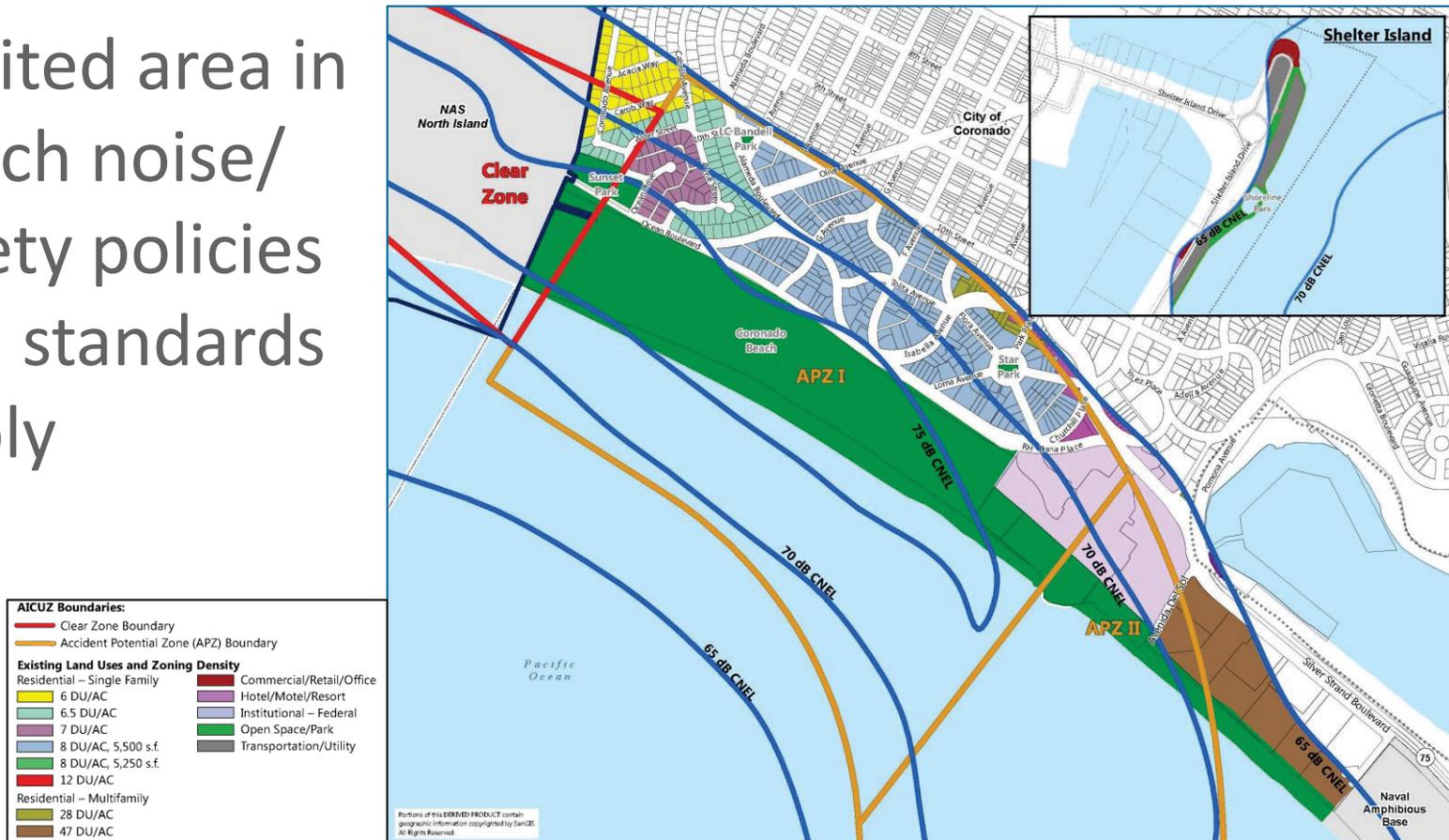
Four Components of an ALUCP



- 1 **Safety** - policies address potential risk of an aircraft accident
- 2 **Noise** - policies address potential noise-sensitive land uses
- 3 **Airspace Protection** - policies address potential hazards to flight
- 4 **Overflight** - policies address notice to owners of new homes in flight paths

Noise & Safety Compatibility

- Limited area in which noise/safety policies and standards apply

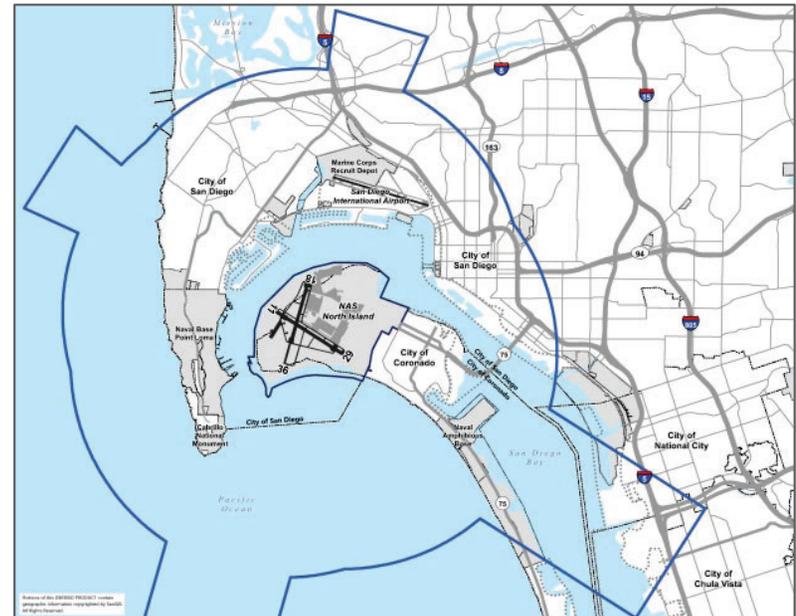


Noise & Safety Compatibility Standards

SLUCM ² CODE	LAND USE TYPE ¹	CZ	APZ I	APZ II	INSIDE 65 dB CNEL ³ & OUTSIDE SAFETY ZONES	STANDARDS ⁴
10	Residences and Lodging					
111	Single-Family including accessory dwelling units; Supportive housing; Transitional housing	45	45	45	45	CZ, APZ I/II: One dwelling unit per legal lot of record at the time of ALUCP adoption, in addition to an accessory dwelling unit All Zones: For new or reconstructed or expanded portions of buildings, interior noise must perform to sound level indicated.
60	Services					
61, 62, 63, 65, 67, 69	Office: Finance, insurance, real estate, medical/dental; Services: Personal/professional/government; Research & Development		50	50		APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for new or reconstructed portions of buildings within the 70+ dB CNEL contour, interior noise must perform to sound level indicated.
6242, 637, 64, 66	Cemetery; Warehousing/storage (not including hazardous materials); Repair, including auto, electronics, furniture; Contract construction services		50	50		APZ I/II: No increase in gross floor area of existing uses; reconstructed buildings limited to gross floor area at time of ALUCP adoption; for public reception and office areas of new or reconstructed portions of buildings within the 70+ dB

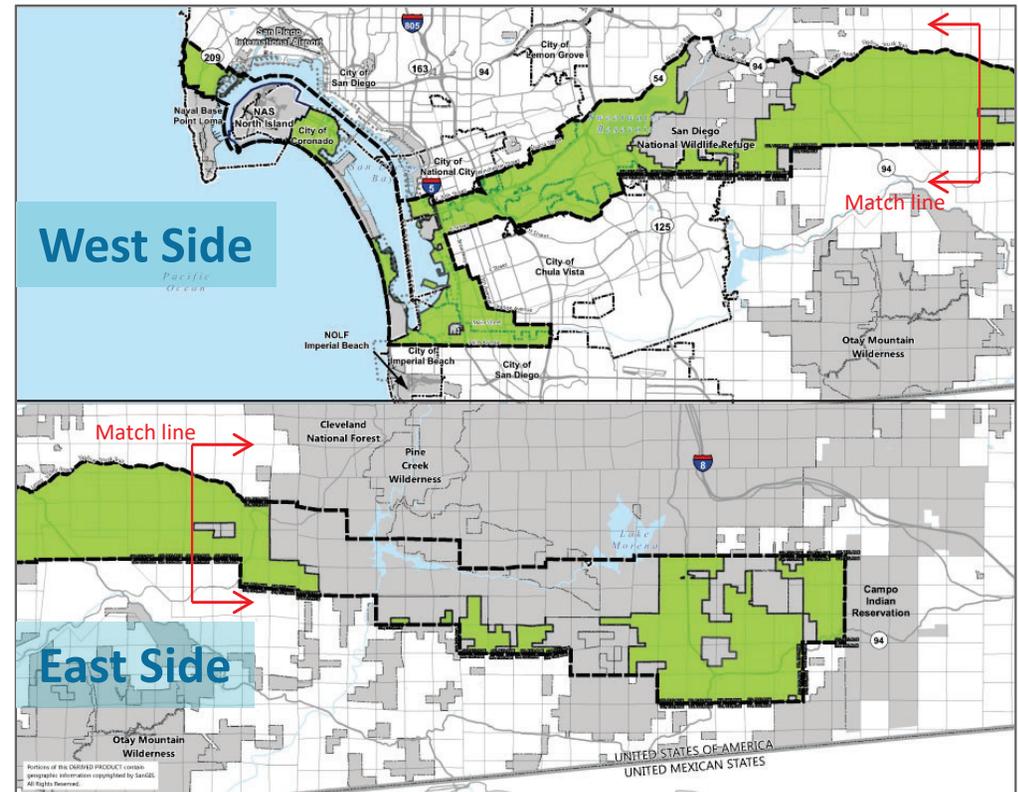
Airspace Compatibility

- Compliance with Federal law – FAA 7460 process
- Land use projects determined to be hazards by the FAA are incompatible
- Hazards to flight are incompatible
 - Glare
 - Thermal Plumes
 - Certain lighting
 - Signal interference
 - Dust, water vapor, smoke
 - Bird attractants

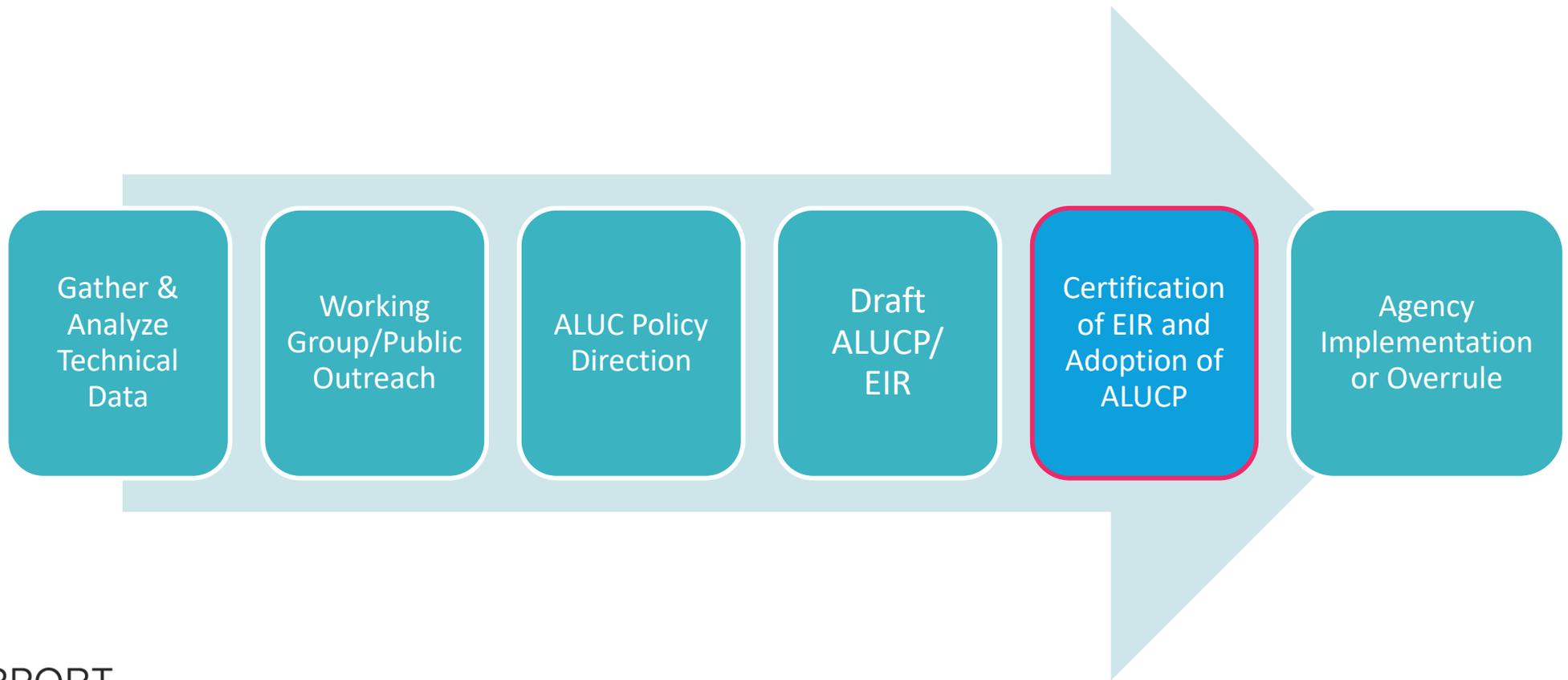


Overflight

- For new or totally reconstructed residences, local agencies should provide a means to notify owners of potential for aircraft overflight



NASNI ALUCP Process



Public Input/Outreach Process

Meeting Type	Quantity	Time Period
Working Group	12	March 2016 – Aug. 2017
Community Meetings	11	March 2016 – May 2019
City of Coronado Staff Coordination Meetings/Briefings	19	Sept. 2015 – Jan. 2019
Hotel del Coronado Coordination Meetings	6	Feb. 2016 – June 2017
Elected Official Briefings	11	Jan. 2016 – August 2020

Public Input/Outreach Strategy

- Majority of Working Group membership held by local community members (14 seats)
- All community meetings held in City of Coronado
- Meeting notices included advertisements and direct mailings

AIRPORT
LAND USE
COMMISSION



Working Group Input on ALUCP

In response to feedback, the following actions were considered compatible:

- Expansion/reconstruction of residences in safety zones or construction of new homes on existing legal lots
- New accessory dwelling units in safety zones
- Expansion/reconstruction of residences in the 65+ dB CNEL contour
- Changes to existing commercial uses that do not increase the level of incompatibility
- Development to be exempt from noise and safety policies if less than 50% of structure located within a noise contour or safety zone

How Local Agencies are Affected

After ALUCP adoption, agency must:

Refer

- Refer all development projects to ALUC

or

Amend

- Amend land use plans and regulations to be consistent with ALUCP; or

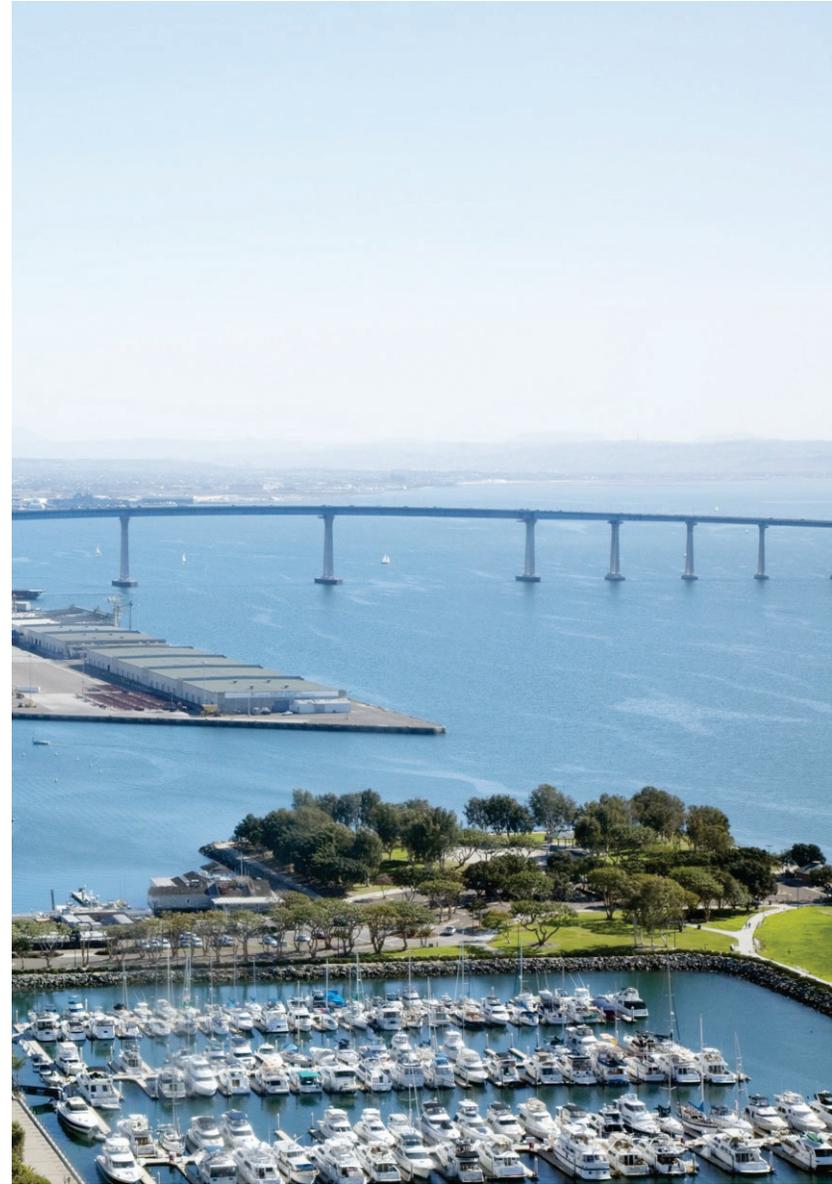
or

Overrule

- Overrule all or part of ALUCP

Environmental Impact Report Overview

AIRPORT
LAND USE
COMMISSION



EIR Timeline



EIR Findings

The proposed ALUCP’s policies and standards would potentially limit future development within the ALUCP Safety Zones in the following ways:

1. Limiting increases in the density of residential development
2. Limiting increases in the intensity of nonresidential development
3. Designating new development of certain land uses as incompatible

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

Project Objectives

1 - Promote the compatibility of land uses within noise contours

- Limit new noise-sensitive development within the 65+ dB CNEL noise contour
- Ensure that new noise-sensitive development within the 65+ dB CNEL meets interior sound level standards

2 - Protect public safety

- Limit new risk-sensitive land uses within safety zones
- Avoid increases in existing land use incompatibility within the safety zones

3 – Protect airspace and the safety of flight

- Limit height of new structures and objects within the airspace protection boundary per FAA standards
- Limit potential hazards to flight within the airspace protection boundary

4 - Promote awareness of potential effects of aircraft overflights

EIR Alternatives Evaluation

Alt. 1- No Project

- Objective 1 
- Objective 2 
- Objective 3 
- Objective 4 -partially

Summary – Alt. 1 fails to meet project objectives and to comply with state laws mandating the adoption of an ALUCP for NASNI

Alt. 2 – Elimination of Density/Intensity Limits in Safety Zones

- Objective 1 - partially
- Objective 2 
- Objective 3 
- Objective 4 

Summary – Alt. 2 fails to limit the increase in land use incompatibility by allowing for increases in density/intensity within the safety zones beyond existing conditions

Alt. 3 – Application of Noise/Safety Standards to Parcels Sited Completely Inside Zones

- Objective 1 
- Objective 2 
- Objective 3 
- Objective 4 

Summary – Alt. 3 would fail to meet project objectives 1 and 2 and would not meet the requirements of following the noise and safety standards of the AICUZ

Preferred Alternative (Draft ALUCP)

- Objective 1 
- Objective 2 
- Objective 3 
- Objective 4 

Summary – Alternative meets all project objectives

Significant and Unavoidable Impacts

- Significant and unavoidable impacts to:
 - Maximum potential displacement of future nonresidential development in Hotel-Motel zoning district – 38,023 sf (assuming buildout of Hotel del Coronado Master Plan)
 - 52% of all H-M-zoned land in Coronado is in ALUCP safety zones
- Mitigation includes working with local agencies to implement

Statement of Overriding Considerations

The ALUCP provides for the orderly development of NASNI, while protecting the public health, safety and welfare, as required by the State Aeronautics Act. The ALUCP

- is consistent with the 2011 AICUZ noise and safety standards and Caltrans *Handbook* guidance;
- ensures that future land use development within the vicinity of NASNI is compatible with the Airport's operations;
- establishes land use measures that minimize the public's exposure to excessive noise and safety hazards; and
- secures the continued operation of NASNI, to the extent that the aeronautical activities otherwise could be impacted by adjacent land use development.

Staff Recommendation

Staff recommends that the Airport Land Use Commission:

1. Adopt Resolution No. xx certifying the Final Environmental Impact Report for the NASNI ALUCP and adopting CEQA Findings of Fact, a Statement of Overriding Considerations, and a Mitigation Monitoring and Reporting Program.
2. Adopt Resolution No. xx adopting the NASNI ALUCP.



Questions?

September 3, 2020 ALUC Meeting

Additional Comments Received from the Public

ITEMS 3 and 4

**CERTIFICATION OF AN ENVIRONMENTAL
IMPACT REPORT FOR THE NAVAL AIR STATION
NORTH ISLAND AIRPORT LAND USE
COMPATIBILITY PLAN**

**ADOPTION OF THE NAVAL AIR STATION
NORTH ISLAND AIRPORT LAND USE
COMPATIBILITY PLAN**



CITY OF CORONADO

1825 STRAND WAY
CORONADO, CA 92118
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(619) 522-7335
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September 2, 2020

Via U.S. Mail and Electronic Mail

Ms. C. April Boling, Board Chair
San Diego County Regional Airport Authority
P.O. Box 82776
San Diego, CA. 92138-2776
Alucpcomments@san.org

Re: Continuance of the September 3, 2020 San Diego County Regional Airport Authority's Public Hearing on the North Island Naval Air Station (NASNI) Final 2019 Airport Land Use Compatibility Plan (ALUCP) and the ALUCP Final Environmental Impact Report (EIR)

Dear Ms. Boling,

The Authority released the Final ALUCP and Final EIR on August 20, 2020 and plans to take action to approve the ALUCP just ten business days later, on September 3, 2020.

At the direction of the Coronado City Council, I am respectfully requesting a two-month continuance of the September 3, 2020 public hearing given the voluminous materials that comprise the Final ALUCP and Final EIR, the short time frame between the release of materials and Authority action on the project, and the importance of giving the public and decision makers enough time to sufficiently review such materials.

On August 20, 2020, the Authority published a six volume, 1,400+ page set of final documents a mere two weeks before a scheduled public hearing to approve the project. When asked if the Airport Authority members had sufficient time to review the documents, the Airport Authority staff described the Final EIR as mostly technical appendices, implying that the technical appendices need not be read or reviewed. It is because the appendices are in fact technical, which makes them difficult to review, and requires specific knowledge, which is why time is needed for a thorough review.

In this era of limited resources and competing health and safety priorities caused by the COVID-19 pandemic, the two-week review period is simply too limited for the robust public review and public participation that Coronado knows the Authority welcomes.

Please inform the City of the Authority's decision on whether to grant an extension by the close of business today, Wednesday, September 2, 2020.

Sincerely,



Blair King, City Manager
City of Coronado

CC: Coronado City Council
Ms. Kimberly J. Becker, President/CEO. San Diego County Regional Airport Authority
Mr. Branden Reed, Director of Planning and Environmental Affairs
Mr. Ralph Redman, Manager, Airport Planning Department



DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL BASE CORONADO
BOX 357033
SAN DIEGO, CA 92135-7033

IN REPLY REFER TO

5000
Ser N00/339
August 20, 2020

San Diego County Regional Airport Authority
Board Members
PO Box 82776
San Diego, CA 92138-2776

Dear Board Members:

SUBJECT: NAVAL BASE CORONADO SUPPORT TO ADOPT THE AIRPORT LAND USE
COMPATIBILITY PLAN FOR NAVAL AIR STATION NORTH ISLAND AND
CERTIFY THE FINAL ENVIRONMENTAL IMPACT REPORT

I am writing on behalf of Naval Base Coronado (NBC) to express my strong support for the San Diego County Regional Airport Authority's adoption of the Airport Land Use Compatibility Plan (ALUCP) onboard Naval Air Station North Island (NASNI) and certification of the accompanying Final Environmental Impact Report at the upcoming Airport Land Use Commission meeting on September 3, 2020. NASNI is part of NBC, which falls under my command.

The plan is consistent with the Air Installations Compatibility Use Zone (AICUZ) Study onboard NASNI and Naval Outlying Landing Field Imperial Beach (2011); including the land use recommendations to address noise and safety related to aircraft operations. As you know, the primary goal of the Department of Defense's (DoD) AICUZ Program is to protect the health, safety, and welfare of those living on and near a military airfield while preserving the operational capability of the airfield. AICUZ documents are intended for use in long-range planning, such as General Plans and ALUCPs. The 2011 AICUZ is representative of the current operating environment at NASNI and remains valid for current and future planning purposes. We support the San Diego County Regional Airport Authority's efforts to promote land use compatibility between our airfield and the surrounding local jurisdictions through the ALUCP for NASNI.

Thank you for the opportunity to comment on this important effort and for your staff's coordination with NBC. My point of contact for this matter is Ms. Anna Shepherd, NBC Community Plans and Liaison Officer. She may be reached at (619) 545-4134 or by e-mail at anna.shepherd1@navy.mil.

Sincerely,

J. W. De PREE
Commanding Officer
Naval Base Coronado